

# Warmwater shrimp social risk profile

Forced labor, human trafficking, and hazardous child labor risks

India, Aquaculture and Processing

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The Seafood Social Risk Tool has been prepared for information purposes only, and is not intended to constitute business, legal, market, financial or investment advice. The Seafood Social Risk Tool is designed to serve as an informational resource and does not override legislation or internal policies or procedures. It is recommended that all users of the Seafood Social Risk Tool seek independent legal advice. The Monterey Bay Aquarium Foundation shall not be responsible to any party related to its use or interpretation of the information contained in the Seafood Social Risk Tool.

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# About the Seafood Social Risk Tool

The Seafood Social Risk Tool (SSRT) is a risk assessment tool that assesses the risks of forced labor, human trafficking, and hazardous child labor associated with a seafood product and producing country. The tool includes more than 80 risk indicators that assess evidence of forced labor, human trafficking, and hazardous child labor in seafood supply chains and the underlying drivers of risk associated with these abuses. This information is used to create risk profiles to help businesses and other interested stakeholders to better understand the risk of human rights abuses in seafood supply chains and to focus businesses' due diligence efforts to improve conditions for seafood workers.

To learn more about the SSRT and access the full list of available risk profiles, visit <a href="https://www.seafoodwatch.org/our-projects/seafood-social-risk-tool">https://www.seafoodwatch.org/our-projects/seafood-social-risk-tool</a>.

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#### **Overview**

India is the world's third largest producer of farmed shrimp and prawns, accounting for 12.6% (0.9 million metric tons/M mt) of global production in 2022, and is the world's second largest producer of whiteleg shrimp (*Litopenaeus vannamei*). Farmed shrimp represented more than 50% of India's total seafood exports by volume and almost 75% by value in 2020-2021. Major export destinations for shrimp from India include the United States, which received more than 40% of India's total shrimp export volume in 2021, followed by China, the European Union, Japan and Vietnam. Shrimp product from India is mainly sold in frozen Headless Shell-On (HLSO) form. Whiteleg shrimp accounted for nearly 96% of India's total farmed shrimp and prawn production in 2022. He main producing and exporting region for whiteleg shrimp is the south-eastern state Andhra Pradesh, where over 75% of whiteleg shrimp production in India takes place.

# Base risks of forced labor, human trafficking, and hazardous child labor in the country in general

The base risks of forced labor, human trafficking, and hazardous child labor in India are heightened by poverty and income inequality between states, high levels of informal employment, and social inequality and discrimination of marginalized groups including women, poor and lower castes, internal migrants, and religious minorities. Meanwhile, legislative gaps on human trafficking and child labor, poor enforcement of labor laws, restrictive legislation regarding trade unions, and anti-union practices hinder the protection of workers.

India's poverty rate is disproportionately divided over the states, with the lower income states being Odisha, Rajasthan, Uttar Pradesh, Bihar, Chhattisgarh, and Madhya Pradesh. Inequalities between states drive high levels of intra-state migration to high income states in search of better economic opportunities<sup>x</sup>. Internal migrants are vulnerable to exploitation as they tend to lack official identity documents, reducing their capacity to access basic social services, and are isolated through lack of a social network, cultural differences, and language barriers.xi,xii A considerable number of migrant workers are employed through labor contractors, where they work in the informal sector or as informal workers in the formal sector.xiii There is a high level of employment in the informal economy in Indiaxiv, in which withholding of wages, debt bondage, and physical and sexual abuse in the workplace are prevalent.\*\* Due to the absence of records or contracts and casualization, workers in the informal sector are very susceptible to exploitative practices. xvi,xviii Seasonal migrant workers, who tend to be from poorer regions and lower castes, xviii have limited access to support and compensation in cases of abuse, and their children tend to face barriers to accessing education due to the isolation of work sites. xix,xx Children work in many different sectors and activities, including hazardous work and are exploited in forced child labor in several sectors including agriculture, in brick kilns, and stone quarries, among other sectors.xxi The 2021 Findings

on the Worst Forms of Child Labor report indicated that over 50% of working children aged 5 to 14 years work in agriculture, which also encompasses food processing, but updated figures are not provided in the 2022 report.\*XII,XXIII

Risks of exploitation for women, especially for those from poor and lower castes (*Dalit*), are increased through perpetuating perceptions rooted in Indian society on gender inequality and practices, such as dowry. *Sumangali* schemes where young girls and women are contracted out for work by their family to earn a dowry often result in debt bondage. \*\*xiv,xxv,xxvi\* While *Sumangali* schemes are banned by the government, people from poor and lower castes still experience discrimination and economic inequalities, especially in Indian rural societies, which were exacerbated during the Covid-19 pandemic. \*\*xvii,xxviii,xxix,xxx\* There is also evidence of persecution against religious groups by government authorities. \*\*xxi\* Inadequate access to benefits and health care, illiteracy, poverty and the prevalence of poor working and living conditions increases the risk of exploitation and trafficking among these marginalized communities. \*\*xxxii,xxxxiii\*

Labor trafficking is not explicitly addressed by law in India and anti-trafficking measures vary by state. This lack of a standardized approach to anti-trafficking and the absence of effective interstate coordination impedes trafficking investigations.xxxiv The practice of bonded labor is formally criminalized, but enforcement is varied with 21 out of India's 36 states not reporting any victims or filing any cases despite evidence to suggest that bonded labor occurs in many of those states.xxxv India's legal framework does not adequately protect children from the worst forms of child labor. The minimum age for work is 14 years old, which is lower than the compulsory education age, and regulation governing hazardous work does not cover all sectors where children are known to engage in hazardous activities. XXXVII Additionally, the Juvenile Justice Act, which imposes penalties for recruitment of child soldiers by non-state actors, does not apply to territories such as Jammu and Kashmir where reported incidents include children as young as 14-years being used in direct hostilities.xxxviii Enforcement of labor laws is hindered by an insufficient number of labor inspectors, alleged corruption and official complicity by police and government officials in trafficking and child labor, as well as caste discrimination by police and other officials.xxxix,xl Meanwhile, restrictive legislation and anti-union discrimination act as barriers to workers' rights to freedom of association and collective bargaining. In 2020, India introduced labor law reforms through the Industrial Relations (IR) Code, which have lessened workers' ability to form and join trade unions, to bargain collectively, and to strike.xii, xiii There are reports of union leaders being prosecuted and workers being dismissed for participating in strikes, as well as incidents of union busting and violent attacks on protesting workers.xliii

# Adjusted risks of forced labor, human trafficking, and hazardous child labor in the country's seafood supply chain

India's shrimp industry has recently been connected to human rights abuses. While direct evidence of forced labor, human trafficking, and hazardous child labor in the wider seafood industry has been limited to date, a series of investigations emerged in early 2024 that all highlight forced labor issues in the shrimp supply chain, in addition to alleged cases of human trafficking and child labor in the shrimp processing industry by local news outlets. A more dated report also identifies hazardous child labor in shrimp farming although the source is not given. Risks in shrimp feed production are outside the scope of this SSRT profile.

Prior to the publication of the March 2024 investigations on India's shrimp supply chain, evidence of human rights abuses in India's seafood industry from within the past ten years mainly covered hazardous child labor in fishing and seafood processing, including the rescuing of girls from seafood processing plants in Kochi, Kerela<sup>xliv</sup>, children being exploited as contract laborers and engaged in activities like diving in harbor waters for underwater cleaning of vessels in Visakhapatnam, Andhra Pradesh<sup>xlv</sup>, and inclusion of children in the workforce in West Bengal's dry fish sector. <sup>xlvi</sup> In addition, there are some articles mentioning bonded (internal) migrant labor on industrial fishing vessels in Maharashtra, where workers stay on board for at least one fishing season of nine months, <sup>xlvii</sup> and children in Visakhapatnam, Andhra Pradesh being employed as bonded laborers as deck hands, kitchen help and errand boys. <sup>xlviii</sup>

There is historic evidence linking human rights abuses to India's shrimp farming industry from its development in the 1980's onwards. Abuses identified include child labor in wild shrimp fry collection and shrimp peeling sheds and processing units, and incidents of hazardous child labor and forced labor, including debt bondage, restriction of freedom of movement, and sexual exploitation of women in shrimp pre-processing plants.xlix Other problems concerned widespread land seizures and conflicts, harassment, intimidation and violence, murder, and imprisonment of protestors by Indian police.¹ Additionally, there were reports of the so-called 'prawn-mafia' lobby operating in certain regions, consisting of dominant landowners, shrimp exporters, politicians and bureaucrats, whose aim was to increase aquaculture production at the expense of others, of which there are still reports in the current day. Ii, IIII

A series of investigations by non-profit journalism organizations, Associated Press and The Outlaw Ocean Project, and human rights legal group, Corporate Accountability Lab, published in early 2024 reveal that some issues in farmed shrimp production and shrimp processing have persisted and further allege prevalent human right abuses at varying levels of the shrimp supply chain, including hatcheries, farms, peeling sheds, and processing plants. A study conducted by the Corporate Accountability Lab (CAL) over a three-year period from 2021-2024 among 150 workers

in Andhra Pradesh at different levels of the supply chain found indicators of forced labor such as debt bondage resulting from recruitment fees and loans, restriction of movement by limiting workers ability to leave company property, hazardous working conditions such as lack or insufficient Personal Protective Equipment (PPE), and abuse and sexual harassment towards women. The report highlights the vulnerabilities of shrimp supply chain workers who are mostly members of marginalized Dalit and Adivasi communities (Scheduled Castes and Scheduled Tribes), or from fishing communities, with many being internal migrants from other states. These migrant workers lack a common language and live onsite, putting them at greater risk of forced labor, especially women migrants. The report further alleges that most workers lack contracts and benefits, or work logs making it difficult to verify wages. At the hatchery and farm level, other labor issues identified included long working hours and limited time off, and poor living conditions onsite. At the peeling sheds and processing level, additional issues found were gender discrimination, intimidation, and threats, as well as fear of retaliation. Workers staying onsite are subjected to abusive living conditions and have their movement and access to their own phones restricted. Furthermore, child labor in the form of teenage girls working as processing workers is reported to be prevalent and there was evidence that workers have been paid on a piece-rate basis since Covid, below minimum wage and without overtime pay. Besides human rights abuses, the report further details the negative environmental impacts of shrimp farming and processing on the surrounding environment, and local community concerns stemming from the adverse impacts of shrimp farming on other livelihoods such as fishing and agriculture, sometimes leaving work in the shrimp industry as the only option. liii

After receiving the advance findings from CAL, the Associated Press (AP) also investigated working conditions in Andhra Pradesh in February 2024. The AP article reports similar labor issues in the shrimp peeling and processing segment, such as long working hours, lack of contracts, payment below minimum wage and no overtime pay, occupational and health and safety concerns, recruitment fees, restriction of movement and abusive living conditions, and retaliation against workers speaking up about working conditions. The article also touches upon environmental concerns such as antibiotic use, contamination, and pollution of the surrounding environment by shrimp farms and processing plants, and abuse against local agriculture farmers protesting the development of processing and cold storage units. [iv

The Outlaw Ocean Project produced a separate series of articles, issued at the same time in 2024, following claims by a whistleblower about exports of known unsafe product and the presence of human right abuses in the processing plant where they had worked. The abuses align with some of the allegations by CAL and AP, such as restriction of movement, payments below minimum wage and delayed wage payments, excessive working hours, limited time off, and substandard living conductions. The articles state that many workers are hired through recruitment agents and comprise a mix of local and internal migrant labor, the latter being mostly illiterate women from the lowest castes. [V,IV]

The findings of these investigations reflect issues that were identified in a 2023 human rights impact assessment conducted on a few shrimp farms and processing plants in Andhra Pradesh for three EU and US retailers, which identified indicators of forced labor including excessive overtime, potential debt bondage, physical violence and sexual harassment among other findings. The allegation of girls working in processing plants is also touched upon by several local news outlets, with one case concerning possible inter-State child trafficking. A dated 2017 report references involvement of girls in the collection of wild shrimp fry, however, the evidence for this claim is not cited. It is important to note that this likely involves the native giant tiger shrimp, for which broodstock is the main source of fry and production represents only 4% of India's total shrimp production. Therefore, the practice of children collecting shrimp fry is likely to be very localized and to occur in less than 1% of India's shrimp production.

These recent investigations, together with historic evidence, highlight the higher levels of risk of human rights abuses in India's farmed shrimp supply chains. This risk is exacerbated by varying levels of product traceability and supply chain transparency.

# Summary of evidence of forced labor, human trafficking, and hazardous child labor in the seafood supply chain

#### **Country-level indicators**

 There is evidence of human trafficking, forced labor, and child labor in a range of sectors in India with twenty-six commodities connected to child labor, including bricks, carpets, cottonseed, textiles and garment, rice, sandstone, stones, thread/yarn, and tea, among others.

#### **Seafood industry-level Indicators**

- Prior to the publication of several investigations on India's shrimp supply chain in March 2024, there was limited direct evidence of forced labor in the country's seafood industry.
- There are reports of (internal) bonded migrant labor and child labor in industrial fishing.
- Reports of hazardous child labor from studies and news articles include forced child labor in seafood processing plants, exploitation as contract labors engaged in diving in fishing harbors, and work in the dry fish sector.
- The 2022 Findings on the Worst Form of Child Labor for India identifies child labor in seafood processing.
- The 2024 Trafficking in Persons (TIP) Report for India is the first TIP Report to mention fish or seafood in relation to forced labor in India since 2018. The report identifies observer reports of indicators of forced labor in aquaculture, including

failure to pay a minimum wage, restricted freedom of movement, and dangerous working conditions. The report also identifies a risk of debt bondage in aquaculture because of these exploitative conditions, particularly among migrant workers and scheduled castes.

#### **Aquaculture indicators**

- No direct evidence was found of human trafficking in shrimp aquaculture, but there is evidence of forced labor, and to a lesser extent, hazardous child labor in parts of the shrimp aquaculture sector.
- Several indicators of forced labor in shrimp farming were reported by different sources in 2023 and 2024 including excessive working hours, the use of recruitment fees and potential for debt bondage, forced and unpaid overtime, physical violence and verbal abuse, sexual harassment, restriction of movement, and unsafe working and poor living conditions.
- The 2024 TIP Report identifies observer reports of indicators of forced labor in "some shrimp and aquaculture facilities" (assumed to include shrimp aquaculture), highlighting Andhra Pradesh. Indicators reported cover failure to pay a minimum wage, restricted freedom of movement, and dangerous working conditions. The report also identifies a risk of debt bondage in aquaculture facilities, particularly among migrant workers and scheduled castes.
- There is evidence, albeit limited, of hazardous child labor in parts of the shrimp farming sector; the Global March report (2017) describes girls collecting wild shrimp fry in contaminated waters, which is hazardous work.

#### **Processing indicators**

- Conditions for evidence of forced labor in the shrimp processing industry were found, as well as cases of potential human trafficking and child labor (not confirmed as hazardous) in the shrimp processing industry.
- Multiple indicators of forced labor in shrimp processing were reported by different sources in 2023 and 2024, including debt bondage through recruitment fees and loans, restriction of movement, hazardous working conditions, abuse and intimidation, sexual harassment towards women, substandard living conditions, and abuse of vulnerability.
- The 2024 TIP Report identifies observer reports of indicators of forced labor in "some shrimp and aquaculture facilities" (assumed to include shrimp processing), particularly in Andhra Pradesh. Indicators reported cover failure to pay a minimum wage, restricted freedom of movement, and dangerous working conditions.

# Summary of factors that affect the likelihood of forced labor, human trafficking, and hazardous child labor in the seafood supply chain

#### Factors that increase the likelihood

#### **Country-level indicators**

- There are high rates of poverty and income inequality between states in India.
- India hosts a substantial number of migrants from neighboring countries, including refugees and asylum seekers from Tibet and Sri Lanka.
- There is a high number of intra-state economic migrants, who are vulnerable to exploitation as they tend to lack official identity documents and speak a different regional language.
- According to Gallup's Migrant Acceptance Index, the populations' acceptance of migrants decreased between 2016 and 2019.
- Ninety percent of India's workforce is engaged in the informal economy, where risks of exploitative practices are high due to the absence of formal contracts.
- There are restrictions on workers' rights to organize and repercussions for organizing workers.
- Perpetuating perceptions of gender inequality and practices such as dowry make women especially vulnerable to exploitation, trafficking, and debt bondage.
- Issues surrounding castes and forced labor remain entrenched in current society.
- Enforcement of the bonded labor act has been minimal and bonded labor is sometimes wrongly identified as labor law crimes or minimum wage violations.
- The number of labor inspectors is insufficient to adequately monitor and report on labor law violations.
- Caste discrimination among law enforcement officials hinders the identification and investigation of human trafficking cases.
- Alleged corruption and complicity among officials contribute to impunity in human trafficking and child labor cases.

#### Seafood industry-level indicators

- No information was found on the implementation and enforcement of the legal framework to protect workers in the seafood industry.
- No information was found on access to workplaces for third-party monitors such as trade union representatives in the seafood industry.
- Most fisheries and aquaculture work fall under the informal sector.
- There is a lack of adequate data on child labor in the fishery and aquaculture sectors.

#### **Aquaculture indicators**

- Shrimp farmers are often dependent upon (unregulated) intermediaries known as middlemen for finance and other inputs that can lead to indebtedness.
- Many shrimp farms are family-operated businesses, which could increase the risk of children engaging in farm work.
- A high proportion of shrimp farm workers are internal migrants.
- Shrimp farm workers include people from Other Backward Class and Scheduled Castes and Scheduled Tribes.
- The monthly income of shrimp farm workers is less than the average annual income of an Indian worker.
- Recruitment agents are used for hiring workers, with some charging recruitments fees.
- Working conditions can be abusive and hazardous, with long working hours, poor living conditions, and lack of proper PPE.
- There is a risk of debt bondage through recruitment fees or loans

#### **Processing indicators**

- There is a high level of young women involved in processing, who are more vulnerable to exploitation.
- Many shrimp processing workers are hired as contract or temporary workers and miss out on social security benefits.
- About half of the shrimp processing workers are inter- and intrastate migrants and of lower castes, who are more vulnerable to abuse.
- Workers have no formal contracts and work logs are not kept.
- Recent investigations indicate cases of actively hiding workers during audits.

#### Factors that decrease the likelihood

#### **Country-level indicators**

- According to the 2024 Trafficking in Persons Report, India's government is making significant efforts to eliminate human trafficking.
- India has ratified all key international conventions on child labor.

#### Seafood industry-level indicators

- According to Global March 2017, no instances of foreign women or child workers have been reported in the fishery sector.
- The growing importance of regular schooling and education has resulted in decreased employment of children in fishing communities.

 Voluntary third-party certification schemes for farmed seafood are present in India, with uptake of Best Aquaculture Practices and Aquaculture Stewardship Council certification.

#### **Aquaculture indicators**

- Increased government efforts to get shrimp farms registered, with different institutes managing registration.
- Shrimp farm workers appear to be Indian nationals.
- While young girls collect wild shrimp fry, it is likely to be the native giant tiger shrimp, which only represents 4% of India's total shrimp production and generally broodstock is used. Therefore, this practice is likely to be very localized and is estimated to affect less than 1% of India's total shrimp production.

#### **Processing indicators**

- Most processing workers are Indian nationals.
- Shrimp is predominantly produced for export, offering a point of leverage for buyers to drive improvement efforts.

## **Aquaculture**

India's seafood industry accounts for 8% of global seafood production and contributes to approximately 1% of India's national GDP. Ixi The aquaculture sector is estimated to be responsible for the employment of 4.2 million people. Ixi In 2020, the government of India adopted the scheme, Pradhan Mantri Matsya Sampada Yojana (PMMSY), to support the country's blue revolution up to 2025. Among its aims is to double the production of aquaculture and export products. Ixiii

The main species produced by India is whiteleg shrimp (*Litopenaeus vannamei*), which comprised 94% of India's total farmed shrimp and prawn production in 2022. Ixiv Production of whiteleg shrimp in India increased because of rising demand in combination with a decline in global production due to disease outbreaks in major shrimp aquaculture producing countries such as Thailand, China, and Vietnam. Ixiv In 2021-2022, Indian whiteleg shrimp production reached 976,213 metric tons (mt) and has been the only food sector with a tenfold production increase over the last fifteen years. Ixivi, Ixiviii The largest producing state of whiteleg shrimp in India is Andhra Pradesh, reporting a production volume of 782,772 mt in 2021-2022, which is more than 80% of the country's production. Ixiviii The districts Krishna, West Godavari, and East Godavari were responsible for 75% of this production. West Godavari is the largest region in terms of production area and contributes nearly 30% of India's total shrimp production. Ixiv The states Gujarat, Orissa, West Bengal, Tamil Nadu &

Pondicherry, Maharashtra and Karnataka, and Gao made up for the remaining volumes. Around 80% of whiteleg shrimp is produced in semi-intensive systems and 15% is produced in intensive systems.

Giant tiger shrimp (*Penaeus monodon*) and giant river prawn (*Macrobrachium rosenbergii*) represent 4% and 2% of the annual shrimp production, respectively. Giant tiger shrimp is mainly produced in the state West-Bengal, which accounts for 54% of the giant tiger shrimp production, reaching 22,185 mt in 2021-2022. Gujarat is responsible for approximately 25%, with the remaining volumes accounted for by the states Andhra Pradesh, Kerala, Orissa, Karnataka, and Goa. Statistical States Andhra Pradesh, Kerala, Orissa, Karnataka, and Goa.

According to the Marine Products Export Development Authority (MPEDA), shrimp production covers a total area of 186,140 hectares (ha). Giant tiger shrimp has the lowest productivity at 0.66 mt per ha per year and takes up 30% of the total registered cultivated area. Whiteleg shrimp takes up 61% of the production area with a productivity of 8.57 mt per ha per year. India is a low-density producer of whiteleg shrimp, India's Coastal Aquaculture Authority (CAA) regulations have limited stocking densities to 60 post larvae (PL) /m². Ixxv Stocking densities therefore range from 25 to 60 PL / m².

There are estimated to be over 100,000 shrimp producers operational in India. Around 90% of producers are small to medium scale with 1.2 to 2 ha sized farms, the majority being family run operations. While some shrimp farmers are also landowners, farm land is often leased from non-residents, companies, or government authorities. There are a few large corporate vertically integrated players that control 10% of farms and production area with the largest farms reportedly covering approximately 80-120 hectares. Farmers use commercial pelleted feed, which amounts to an estimated 50-60% of farm expenses, and typically carry out feeding activities manually.

The level of farm registration is increasing, which gives farms a legal status and provides access to financial governmental support. Up to 2022, a total of 45,113 shrimp farms with a total farm area of about 69.5 thousand ha were registered under the CAA. Execution by the CAA is reportedly inhibited by costs, difficulties for small scale farmers to comply with the CAA's standards and a lack of enforcement power. Execution Aquaculture farms producing for export are required to register with MPEDA to be able to obtain a Pre-Harvest Test certificate, which is mandatory for export to European Union (EU). Requirements for registering with MPEDA, including proof of ownership and a demonstration of the legality of the farm's location, should help ensure that farms do not violate the CAA regulations. Execution is MPEDA, the authority has a database of over 70,000 aquaculture farms.

Currently, broodstock of whiteleg shrimp can only be imported from approved sources and are quarantined in government run facilities. || Based on data from the CAA, there are 314 shrimp hatcheries that are registered to import specific pathogen free (SPF) whiteleg shrimp broodstock, with a production capacity of 45 billion PLs per annum | xxxviii, although it is alleged that there are many more unregistered hatcheries with the total number estimated to be 585 in 2021. Ixxxix There were 183 Nauplii Rearing Centers registered by the end of 2022 that produce PLs with an annual capacity of 8 billion L. vannamei seeds. xc Hatcheries are predominantly located in the states, Andhra Pradesh and Tamil Nadu, with 40% of PLs being produced in Andhra Pradesh's district East Godavari.xci Around 40% of the hatcheries are owned by small or midsized companies xcii, operating one or two units and employing 15 to 30 workers per unit. xciii A couple of larger companies own independent hatcheries or privately owned hatcheries with multiple units. xciv The government is interested in developing fully contained and bio-secure broodstock multiplication centers that can complete the lifecycle of whiteleg shrimp and generate broodstock locally.xcv The government also approved the import of SPF giant tiger shrimp broodstock.xcvi Since then, local infrastructure to supply giant tiger shrimp broodstock has grown with importing companies partnering with local hatcheries to produce PL.xcvii

Actors operating in the shrimp value chain up to the farming level include hatcheries, nurseries, middlemen / input and sub-dealers, feed manufacturers, and farms. Middlemen sometimes serve as financers for farmers and are reported to control around 40% of production. The value chain is varied, with the existence of some fully vertically integrated companies. \*\*cviii\*

## **Processing and Trade**

Post-harvest operations depend on the level of vertical integration in the shrimp supply chain. The shrimp product is either taken by middlemen or commission agents to be sold to processing units, directly sent to processing units, or sold at farm gate level. An estimated 40% of shrimp products from farms are directly sold to processing units, while commission agents/middlemen are responsible for buying up another 40%, and the remainder are sold at farm gate level.\*\*Cix Middlemen play an informal role in the supply chain and are unregulated. They act as facilitators between farms and processing units by sourcing and selling raw materials and sort, preprocess, and transport the shrimp product for processors.\*

Processing units vary from non-integrated to fully integrated facilities, depending on whether they conduct pre-processing or processing activities. Pre-processing includes activities such as cleaning, peeling, washing, and icing, while processing consists of grading, packing, weighing, and freezing. Separated pre-processing activities tend to occur in small-scale units that are labor intensive, while processing requires large-scale, capital-intensive units.ci Women are the predominant workforce in

both units. cii, ciii There are 598 pre-processing centers registered with MPEDA across India. civ Whether this number reflects all pre-processing units is unclear. Efforts have been made to integrate pre-processing activities in EU-approved processing facilities. cv Pre-processing is reportedly outsourced when the processors lack space or sufficient workforce, and during peak production periods, or when sourcing shrimp from further away.cvi Recent reports indicate usage of peeling sheds for product intended for export, although it is not clear whether these are to be considered as registered pre-processing facilities.cvii,cviii,cix Peeling sheds are reported to be mostly operated by small businesses or individuals, having primitive constructions, and located in secluded coastal areas.cx

Some processors use external exporter firms to export their product.<sup>cxi</sup> There are 625 processors and 681 cold storage facilities registered with MPEDA, of which 500 have approved export licenses to the EU.<sup>cxii,cxiii,cxiv</sup> Shrimp is exported from 23 Indian ports. The principal shrimp export port is Vizag Sea Port, located in northern Andhra Pradesh. Other important ports are Krishnapatnam Port Sea in central Andhra Pradesh and Kolkata Sea in the south of West Bengal.<sup>cxv</sup>

Despite India's large seafood industry, the industry does not contribute significantly to the country's food security besides coastal regions. Reports on domestic consumption of shrimp are varied, with some indicating an increase in the last couple of years to 20% of total production, while other sources indicate the share is not bigger than 50,000 mt. Domestically consumed shrimp are primarily sold fresh.

India's whiteleg shrimp production is predominately intended for export and India is globally the second largest exporter on the international shrimp market. Shrimp exports accounted for 53% of India's seafood export volume and 75% of the total seafood export value in 2021-2022.cxix The main export markets are the United States, which accounts for 40% of total exports, followed by China, the EU, Japan, and Vietnam.cxx Shrimp are mainly exported in frozen Headless Shell-On (HLSO) product form.cxxi In 2020-2021, 728,123 mt of frozen shrimp was exported.cxxii To a lesser extent shrimp is exported as cooked and breaded product. Reported investment into processing capacity for value-added products indicates that India's shrimp exports may diversify further in the coming years.cxxiii

While there are instances of full vertical integration in the Indian supply chain with some large companies owning farms and processing facilities, there is an equal if not larger segment that is still fragmented. This fragmentation, in combination with the large number of small to medium scale farms, of which more than half lack formal registration, and the involvement of middlemen / agents, makes product traceability challenging.

## **Due Diligence for Warmwater Shrimp in India**

#### **Important Country-Specific Considerations**

- India is a major producer and exporter of farmed shrimp to the United States and the European Union.
- The farmed shrimp industry has a varying level of vertical integration, with most producers being small-scale. Intermediaries known as middlemen provide inputs and finance and are responsible for handling almost half of the production.
- There is a high level of internal migration within India, with workers moving from lower income to higher income states. Migrant workers are more vulnerable to exploitation. This, in combination with recent reported cases of widespread use of recruitment agents, and with many charging recruitment fees, has fed into the allegations of the presence of forced labor.
- Gaps in relevant legal frameworks, limited inspection resources, and official corruption and complicity hamper the enforcement of relevant labor and trafficking regulations.

#### **Suggested Due Diligence Priorities & Questions**

#### **Migrant Labor**

There is a high level of internal migration within India and migrants can be vulnerable to labor exploitation. Internal migrant workers are commonly employed in the shrimp industry. There is limited information on the employment of foreign migrant workers in shrimp production.

- 1. What is the proportion of foreign and internal migrant workers employed?
- 2. Where do migrant workers originate from and what language do they speak?
- 3. Are contracts written in a language that migrant workers understand and were terms and conditions of the contract understood before workers migrated?
- 4. What is the main language spoken onsite and what provisions are in place for any migrant workers that may not speak the language? Is information on workers' rights, grievance mechanisms, and health and safety displayed in a way that all workers can understand?
- 5. Are migrant workers housed onsite and are the living conditions appropriate and safe?
- 6. Are workers that are housed onsite free to leave during off-hours?
- 7. Are workers able and allowed to communicate with their families or anyone outside the premises when accommodated onsite?

#### **Recruitment and contracts**

Shrimp farm and processing workers are generally hired via contractors, which allows companies to avoid complying with labor laws or providing workers with social security benefits by not issuing formal documentation. In addition, there have been reports of workers borrowing money to pay recruitment fees, which could result in debt bondage.

- 1. Are workers hired directly or through recruitment agents? What procedures are in place to manage the use of recruitment agents within their own operations and those of their raw material supplier?
- 2. Are there monitoring and accountability processes to verify ethical performance requirements of recruitment agents? Are recruitment agents registered with the appropriate authorities?
- 3. Do you know how recruitment agents comply with the 'Employer Pays Principle', including whether they have a procedure for verifying that workers are not charged fees and a mechanism for workers to report violations?
- 4. Are working hours, rest periods, and wages set in work agreements for all workers?

#### Working hours and compensation

Incidents of low wages, excessive working hours, and forced overtime have been reported in shrimp supply chains.

- 1. How are working hours, overtime, and rest periods monitored for all workers, including temporary, seasonal, and contract workers?
- 2. Do workers receive a pay slip and are they aware of wage-setting mechanisms? Is there a mechanism to enable workers to sign off on the hours they have worked or to dispute incorrect payments?
- 3. Is overtime voluntary and compensated?
- 4. Are workers paid at least the minimum wage according to state or sector requirements?
- 5. What payment structure is used to compensate workers (e.g., piece rate or fixed salary)?
- 6. Are all workers given social security benefits such as insurance, Employees' Provident Fund and Employees' State Insurance Corporation?

#### **Company and Supplier Policies / Processing Activities**

The level of vertical integration is limited and there is quite a high involvement of intermediaries in the shrimp supply chain, therefore, product ownership can change multiple times before arriving at the processing plants. Limited traceability in the shrimp supply chain means it may be difficult to identify where shrimp raw materials are sourced from and what routes they have taken in the supply chain.

- 1. Does the company know where processing companies/suppliers are sourcing their shrimp inputs?
  - a. Is there traceability back to the farm, and does the company know what working conditions and arrangements are like on the farm?
  - b. Do workers in your operation/supply chain have access to a complaint mechanism?
- 2. Do processing companies have established relations with certain intermediaries or agents that operate on behalf of the company?

# **India: Country-level indicators**

Indicator	Description	Sources
Poverty levels in a country	Human Development Index  HDI Value (2022): 0.644  HDI Rank (2022): 134	UNDP Human Development Index (HDI)
	India's HDI value for 2021 places it in the 'medium human development' category and positions it at 134 out of 193 countries and territories. India's HDI value for 2022 is above the average of 0.640 for countries in the medium human development group and above the average of 0.641 for countries in South Asia.	UNDP Global Human Development Indicators Country Ranks
	Between 1990 and 2022, India's HDI value increased by 48.4%, showing progress with each of the HDI indicators for life expectancy, education, and Gross National Income (GNI), only decreasing in recent years after the COVID-19 pandemic. However, when India's HDI value is discounted for inequality, it falls to 0.444, a loss of 31.1% due to inequality in the distribution of the HDI dimension indices. The average loss due to inequality for medium HDI countries is 30.2% and for South Asia the average loss is also 30.9%.	
	Poverty headcount ratio at national poverty line (% of population): 21.9% (2011), showing decline over 2 years from 29.8% (2009).  The poverty headcount ratio is lower than neighboring countries, Afghanistan, Bangladesh, Myanmar, and Nepal, the same as neighboring country Pakistan, but higher than neighboring countries, Bhutan, China, and Sri Lanka:  • Afghanistan (2016) 54.5%  • Bangladesh (2016) 24.3%  • Bhutan (2017) 8.2%	World Bank

Indicator	Description	Sources
	<ul> <li>China (2020) 0%</li> <li>Myanmar (2017) 24.8%</li> <li>Nepal (2010) 25.2%</li> <li>Pakistan (2018) 21.9%</li> <li>Sri Lanka (2016) 4.1%</li> </ul>	
	Global Hunger Index (2022):  India ranks 107 <sup>th</sup> out of 136 qualifying countries. With a score of 29.1 out of 100, India suffers from a level of hunger that is 'serious'.  India scores better than neighboring country, Afghanistan (2022) 29.9, but worse than neighboring countries, Bangladesh (2022) 19.6, China (2022) <5, Myanmar (2022) 15.6, Nepal (2022) 19.1, Pakistan (2022) 26.1, Sri Lanka (2022) 13.6.0. There is no data for Bhutan.  Note: GHI is scored on a 100-point GHI Severity Scale,	Global Hunger Index (GHI)
	where 0 is the best score (no hunger) and 100 is the worst (where ≥ 50 is 'extremely alarming').	
Country's position in the regional economic power system	Comparing HDI ranking to other countries in the region  India  • HDI Value (2021): 0.633  • HDI Rank (2021): 132  Neighboring Countries:  Afghanistan  HDI Value (2021): 0.478  HDI Rank (2021): 180  Bangladesh  HDI Value (2021): 0.661	UNDP Human Development Index (HDI)

Indicator	Description	Sources
	Bhutan HDI Value (2021): 0.666 HDI Rank (2021): 127	
	<b>China</b> HDI Value (2021): 0.768 HDI Rank (2021): 79	
	<b>Myanmar</b> HDI Value (2021): 0.585 HDI Rank (2021): 149	
	<b>Nepal</b> HDI Value (2021): 0.602 HDI Rank (2021): 143	
	<b>Pakistan</b> HDI Value (2021): 0.544 HDI Rank (2021): 161	
	<b>Sri Lanka</b> HDI Value (2021): 0.782 HDI Rank (2021): 73	
	Comparing its recent economic growth to the general economic growth rates in the region	World Bank Databank figures on
	India GDP Growth (annual %): 7 (2022)	annual economic growth
	Neighboring countries:	
	Afghanistan GDP Growth (annual %): -20.7 (2021)	
	Bangladesh GDP Growth (annual %): 7.1 (2022)	
	Bhutan GDP Growth (annual %): 4.1 (2021)	

Indicator	Description	Sources
	China	
	GDP Growth (annual %): 3 (2022)	
	Myanmar	
	GDP Growth (annual %): 3 (2022)	
	Nepal	
	GDP Growth (annual %): 5.6 (2022)	
	Pakistan	
	GDP Growth (annual %): 6.2 (2022)	
	Sri Lanka	
	GDP Growth (annual %): -7.8 (2022)	
	Migration data	IOM Migration Data
	Net migration rate (immigrants minus emigrants per	Portal
	1,000 population) for India is -0.2 (2021).	
	Regional migration trends and patterns	<u>UN International</u>
	Regionally, Central and South Asia is the top sender	Migration, 2019
	of migrants abroad, with an annual average of 1.5	Pew Research
	million people emigrating away from this region.	<u>Center, 2017</u>
	From 2000 to 2020, India, Bangladesh, Nepal, and	
	Pakistan combined accounted for 84% of the region's	United Nations High
	total net migration to other countries. <b>UN</b>	Commissioner for
	International Migration, 2019	Refugees (UNHCR),
		31 January 2020,
	India has a nuanced and diverse migration history,	Fact Sheet: India
	with a diaspora spanning the globe. In 2019, India was	PRS Legislative
	the top country of origin of migrants by numbers,	Research, Migration
	with 17.5 million people living internationally. <u>UN</u>	in India and the
	International Migration, 2019 Yet, it has one of the	impact of the
	lowest emigration rates by percentage of the	lockdown on
	population, just 1%, given its large population size.	migrants, 2020
	About half of the migrants from India now live in one of three main countries: the United Arab Emirates	
	of three main countries: the United Arab Emirates,	

Indicator	Description	Sources
	Pakistan, and the United States. Pew Research Center, 2017  In addition to being a major source of migrants, India hosts the 12 <sup>th</sup> largest immigrant population in the world, with about 5.2 million people from other countries living there in 2015. Most immigrants originate from neighboring countries Bangladesh, Pakistan, Nepal, and Sri Lanka. Pew Research Center, 2017	Ashok, S & Thomas, N 2014, 'A Study on issues of inter-state migrant labourers in India', International Journal of Scientific & Engineering Research, vol. 5, no.7, p. 92
	India hosts over 244,000 refugees and asylum seekers mostly from Tibet and Sri Lanka, according to UN data in 2020. <u>UNHCR, 31 January 2020</u>	
	Migration within India is common. The Constitution of India offers basic freedom for internal migrants to move to any part of the country. There are inter and intra-state migrants, with intra-state migrants accounting for 88% according to a 2011 census. Internal migration is mainly driven by the states' economic inequities with most traveling from lower income states, such as Bihar, Jharkhand and West Bengal to higher income states such as Maharashtra, Andhra Pradesh, Kerala and Karnataka. Internally, migrant workers face challenges through lack of social security and health benefits and lack of portability of state-offered benefits such as food provisions. PRS Legislative Research, 2020, Ashok, S & Thomas, N 2014	
	In addition, internal migrants may also face difficulties through speaking different regional languages.	
	Known human trafficking routes  The US Department of State's 2024 Trafficking in Persons (TIP) Report identifies exploitation of	US Department of State, 2024, 2024 Trafficking in

I. Parter	December 19 and	C
Indicator	domestic and foreign victims in India and Indian victims abroad over the past five years. Most bonded labor victims were identified in states Uttar Pradesh, Karnataka, and Tamil Nadu in 2022. However, the reporting of bonded labor victim identification varies by state, with 21 out of 36 states and union territories not reporting identifying victims despite ongoing reports of bonded labor in many of them. Women and girls migrate internally from poorer areas to wealthier cities and states, where they are subject to trafficking. In addition, traffickers recruit women and girls from Nepal and Bangladesh into sex trafficking, often under false pretense. Women and girls from countries in Central Asia, Europe, and Africa are also exploited in sex trafficking. Meanwhile, Indian migrants are subject to sex trafficking and forced labor overseas in Gulf countries and Southeast Asia. US Department of State, 2024  The Freedom Collaborative Victim Journeys Map identifies multi-directional trafficking between India and Kenya, as well as trafficking within India, and from Nepal, Bangladesh, Myanmar and Uzbekistan to India. Half of victims that were reported are involved in the commercial sex industry, 30% in domestic work, and 10% in Agriculture/Forestry/Fishing and the remainder in an 'Other' category.	Persons (TIP) Report  Freedom Collaborative, No date, Victim Journeys Map
Governance practices and systems in a country (measured through indexes)	<ul> <li>WGI (2022) Percentile rank:</li> <li>Voice and Accountability: 49.28</li> <li>Political Stability and Absence of Violence: 24.53</li> <li>Government Effectiveness: 63.21</li> <li>Regulatory Quality: 50.94</li> <li>Rule of Law: 55.19</li> <li>Control of Corruption: 44.35</li> </ul>	World Governance Indicators (WGI)

Indicator	Description	Sources
	India ranks in the lower percentiles for three indicators, 'Voice and Accountability', Political Stability and Absence of Violence', and 'Control of Corruption', and the other three in the higher percentiles. India ranks slightly to moderately above the regional average for South Asia, except for the indicator 'Political Stability and Absence of Violence', which ranks slightly below the regional average.  Note: Percentile rank among all countries ranges from O (lowest) to 100 (highest) rank, where the higher the percentiles, the better the governance.	
	Corruption Perception Index (2023):  Score: 39/100  Rank: 90/180 countries  More than two-thirds of countries score below 50 on this year's CPI, with an average score of just 43. India's score of 39 places it below the average and positions it 90 <sup>th</sup> out of 180 countries and territories. India scores better than neighboring countries Afghanistan (20), Bangladesh (24), Myanmar (20), Nepal (35), Pakistan (29), and Sri Lanka (34), but worse than neighboring countries Bhutan (68) and China (42). India also scores worse than the regional average of 45.  Note: Based on 0 = Highly Corrupt, 100 = Very Clean.	Transparency International Corruption Perception Index (CPI)
	Basel Anti-Money Laundering Index (2020): Rank: 70/141 countries Overall score: 5.15/10	Basel Anti-Money Laundering (AML) Index

Indicator	Description	Sources
	Average 2020 Basel AML Index is 5.22, with India's 5.15 score putting it just below the global average.	
	The South Asia region has the highest overall risk score and exceeds the global average across all categories, indicating a higher risk for money laundering and terrorist financing. India is lowest risk in this region.	
	Globally, neighboring country Afghanistan ranks first making it the highest risk of all 141 countries included, and Myanmar ranks third.	
	Neighboring countries:  Afghanistan: 8.16/10 Bangladesh: 5.88/10 Bhutan: No data China: 6.76/10 Myanmar: 7.86/10 Nepal: No data Pakistan: 6.3/10 Sri Lanka: 6.52/10  Note: India is not assessed in the 2023 edition of the Index. Ranking in the 2020 edition is out of 141 countries; top possible score is 0 (low risk), lowest score is 10 (high risk).	
	Global Rights Index (2024):  Rating: 5 (No guarantee of rights)  The ITUC Global Rights Index rates India worse than the regional average ranking of 4.13 for the Asia-Pacific region, which the index rates as the second worst region in the world for workers, behind the Middle East and North Africa.	International Trade Union Conference (ITUC) Global Rights Index (GRI)
	India is not ranked within the top ten worst countries for working people in 2024, but the previous year's	

Indicator	Description	Sources
	2023 report does cite workers experiencing beatings by state forces, and restrictions on the right to form trade unions.	
	Neighboring countries:  • Afghanistan: 5+  • Bangladesh: 5  • Bhutan: No data  • China: 5  • Myanmar: 5+  • Nepal: 3  • Pakistan: 5  • Sri Lanka: 4  Note: Countries are ranked from 1 to 5+, where five plus corresponds to "no guarantee of rights due to the breakdown of the law" and 1 corresponds to	
	"sporadic violations of rights".	
Education and general literacy levels in a country	Adult literacy rates, among the population aged 15 years and older (2018): 74%.  Adult female literacy rate (2018): 66%  Adult male literacy rate (2018): 82%  Comparison to neighboring countries:	World Bank Open  Data
	<ul> <li>Afghanistan (2021): 37%</li> <li>Bangladesh (2020): 75%</li> <li>Bhutan (2021): 71%</li> <li>China (2020): 97%</li> <li>Myanmar (2019): 89%</li> <li>Nepal (2021): 71%</li> <li>Pakistan (2019): 58%</li> <li>Sri Lanka (2020): 92%</li> </ul>	
	Primary school completion rates, total (% of relevant age group) (2021): 97%	World Bank Open Data

Indicator	Description	Sources
	Primary completion rates, female (% of relevant age group) (2021): 98%	
	Primary completion rates, male (% of relevant age group) (2021): 96%	
	Comparison to neighboring countries:  • Afghanistan (2019): 84%  • Bangladesh (2021): 122%  • Bhutan (2021): 90%  • China (2009): 98%  • Myanmar (2018): 95%  • Nepal (2022): 106%  • Pakistan (2019): 73%  • Sri Lanka (2020): 98%  Note: "There are many reasons why the primary completion rate can exceed 100 percent. The	
	numerator may include late entrants and overage children who have repeated one or more grades of primary education as well as children who entered school early, while the denominator is the number of children at the entrance age for the last grade of primary education."	
	Lower secondary education completion rates, total (% of relevant age group) (2021): 85.8%	World Bank Open Data
	Lower secondary completion rates, female (% of relevant age group) (2021): 87.8%	
	Lower secondary completion rates, male (% of relevant age group) (2021): 84.0%	
	Comparison to neighboring countries: <ul> <li>Afghanistan (2019): 58.3%</li> <li>Bangladesh (2018): 88%</li> <li>Bhutan (2021): 85.2%</li> <li>China (2011): 99.5%</li> </ul>	

Indicator	Description	Sources
	<ul> <li>Myanmar (2018): 64.8%</li> <li>Nepal (2022): 102.8%</li> <li>Pakistan (2019): 49%</li> <li>Sri Lanka (2020): 100.5%</li> </ul>	
	Note: "There are many reasons why the rate can exceed 100 percent. The numerator may include late entrants and overage children who have repeated one or more grades of lower secondary education as well as children who entered school early, while the denominator is the number of children at the entrance age for the last grade of lower secondary education."	
	School enrolment, tertiary (2021): 31% gross  School enrolment, tertiary, female (2020): 31%  School enrolment, tertiary, male (2021): 30%  Comparison to neighboring countries:  • Afghanistan (2020): 11%  • Bangladesh (2021): 25%  • Bhutan (2021): 23%  • China (2021): 64%  • Myanmar (2018): 19%  • Nepal (2022): 17%  • Pakistan (2019): 12%  • Sri Lanka (2020): 22%  Note: "There are many reasons why the rate can exceed 100 percent. The numerator may include late entrants and overage children who have repeated one or more grades of lower secondary education as well as children who entered school early, while the denominator is the number of children at the entrance age for the last grade of lower secondary education."	World Bank Open Data

Indicator	Description	Sources
Attitudes towards migrant workers in a country's population	Migrant Acceptance Index score: 4.01/9 (2019)  Notably, the score for India declined from 4.90 in 2016 to 4.01 in 2019, reflecting a controversial change in 2019 to laws relating to pathways to citizenship for migrants.  Comparison to neighboring countries:  • Afghanistan: 3.61/9 (2019)  • Myanmar: 4.00/9 (2019)  • Pakistan: 4.21/9 (2019)  Note: Based on 138 countries surveyed in 2016; U.S. surveyed in 2017; top possible score is 9.0, where the higher the score, the more accepting of migrants the population is. The Index was updated in 2019.	Gallup Migrant Acceptance Index
Legislation and regulation to protect migrant workers	Coverage of legal provisions under the labor laws  India has not ratified the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families.  Given that much of the migrant work in India is internal, there are legal provisions in laws focusing on domestic workers. The Inter-state Migrant Workmen Act of 1979 provides some protections, but the Act is barely implemented and there are issues of compliance. This Act will likely be grouped into a larger Occupational Safety, Health and Working Conditions Code, which the Ministry of Labor and Employment introduced in 2019. This code combines 13 past labor laws, including the Dock Workers Act of 1986, and seeks to further regulate the health and safety of workers.  Andhra Pradesh scores above average compared to other states in India for migrant integration policy according to the Interstate Migrant Policy Index	UN Treaty Body Database  Committee on Migrant Workers  Un News, India must follow Supreme Court orders to protect 100 million migrant workers: UN rights experts, June 4, 2020  iPleaders, Rights of migrant workers in India, Ms Sankalpita Pal, August 27, 2020  Negi, Chitranjali, Human Rights Violations of Migrants Workers

(IMPEX), meaning this location has slightly better local policies to support internal migrant workers. IMPEX, 2019 It is worth noting that only 12% of internal migration is between differing states, rather the bulk is within the same district according to the World Bank's analysis of census data.

During the 2020 COVID pandemic, the conditions for the internal migrant workers travelling back to their homes were abysmal. They received no protections until the Supreme Court stepped in to order the government to give access to free transport, food, and water. In addition to the poor travelling conditions, the migrant workers faced discrimination not only based on their status as migrant workers or minorities but also as "virus carriers" by the public. UN News, June 4, 2020

After this mandate, several state governments moved forward with schemes to protect migrant workers during the pandemic. These measures included setting up temporary shelters using unused buildings, providing food and money, and setting up relief camps as well as finding stranded workers. <u>iPleaders</u>, <u>Ms Sankalpita Pal</u>, August 27, 2020

While there is a national law to protect migrant workers in a time of crisis such as the Covid-19 pandemic known as the Inter-State migrant workmen (regulation of employment and conditions of service) Act of 1979, during the Covid-19 pandemic there were serious incidents of migrant rights violations. After imposing the initial lockdown in March 2020, migrant workers were struggling for transportation back to their home state, and obtaining food, water, and shelter during transport. In this period there are records of police brutality and deaths of migrant workers trying to get back home at the initial lockdown stage. Two months after the initial

in India During COVID-19 Pandemic (June 17, 2020)

Hindustan Times,
Explainer: Migrant
workers to get
social security in the
new avatar of 1979
law that was not so
effective, Chetan
Chauhan, May 28,
2020

Indicator	Description	Sources
	lockdown, the Supreme Court directed states to provide free food, shelter, and transport to stranded migrants. Hindustan Times, 2020, Negi, C., 2020	
	Access to social protection, health, and education  Given the large volumes of internal migrants, there are limited social protections that address migrants' specific vulnerabilities. Access to public services is constrained by a lack of awareness among migrants as well as gaps in policies and the absence of a coherent social protection framework. Migrant workers have been unable to obtain subsidies for food and fuel, and interstate migrant workers are deprived of a wide range of health entitlements, as these are not transferable across state boundaries. Urban Health Centers for primary health care remain inaccessible as their timings would compel workers to give up a day's wages to access care. Additionally, health workers can only conduct visits to "recognized slums" that are part of their mandated areas, whilst migrant communities reside in open, unrecognized settlements or inside worksites outside the purview of such services. Given their temporary nature and general lack of domicile documents needed to obtain social housing, migrants struggle to find housing facilities. As result, they may resort to renting rooms in slums, where they are vulnerable to rent extortion, or choose informal settlements in open public places where they are at risk of eviction and lack of basic amenities.	ILO, Road map for developing a policy framework for the inclusion of internal migrant workers in India, 2020 ILO, Social Protection - India
	Migrant communities have been identified as one of the socially and economically disadvantaged groups in terms of access to education, due to a combination of factors, including: lack of appropriate documentation, lack of parental support in enrolment processes, lack of medium education schools that cater to migrant	

Indicator	Description	Sources
	children and a lack of schools in general in migration hotspots. ILO, 2020	
	ILO constituents in India have agreed under the Decent Work Country Program 2023-027 Strategic priority 3, to "Promote and strengthen institutions to enable all workers, especially those who are marginalized and vulnerable, to improve their employment outcomes and progressively achieve universal social protection", with one of the following goals: to have "by 2027, fair, effective and inclusive policy frameworks, institutional mechanisms and services developed to reduce discrimination and inequalities and to protect the rights of migrant workers, women workers, especially those in the informal economy and workers in vulnerable situation". ILO, Social Protection - India	
	Bilateral MOUs or other agreements specifically designed to protect migrant workers	Ministry of External Affairs, India, 2016
	India signed labor agreements with Qatar and Jordan in the 1980's. More recently, India signed a MOU with the United Arab Emirates in 2006, Kuwait in 2007, Oman in 2008, Malaysia in 2009, and negotiations with Saudi Arabia and Yemen are ongoing. While each MOU is different, they all have the overarching goals of declaring mutual intent to enhance employment opportunities bilaterally and support the protection and welfare of workers. Ministry of External Affairs, India, 2016	7.11 di 10 j maia, 20 10
Ratification of relevant international conventions and domestication of conventions into a national legal framework (Forced labor,	Convention No. 29 - In Force	Forced Labour Convention, 1930 (No. 29)

Indicator	Description	Sources
human trafficking, and hazardous child labor)		
	Convention No. 105 - In Force	Abolition of Forced Labour Convention, 1957 (No. 105)
	Convention No. 138 - In Force	Minimum Age Convention, 1973 (No. 138)
	Convention No. 182 - In Force	Worst Forms of Child Labour Convention, 1999 (No. 182)
	Protocol 29 - Not Ratified	Protocol of 2014 to the Forced Labour Convention, 1930 (P29)
	Palermo Protocol - Ratified	Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime (the 'Palermo Protocol')

Indicator	Description	Sources
	Convention No. 188 - Not Ratified	ILO Convention 188 on Work in Fishing;
	PSMA - Not Party to the PSMA	The FAO Port State Measures Agreement (PSMA)
	Domestication into national legislation  The law prohibits all forms of forced labor, but it remains widespread including bonded labor for both adults and children. US Department of State, 2022	US Department of State, 2022 Country report on human rights practices: India
	The minimum age for work is 14 years, and children aged 14-18 years are legally prevented from hazardous work.	US Department of Labor, Bureau of International Labor
	The Bonded Labor System (Abolition) Act of 1976 made bonded labor illegal, however the penalties prescribed by this law are not sufficiently stringent. Bonded labor was additionally criminalized under the Scheduled Castes and Scheduled Tribes (Prevention of Atrocities) Act of 1989 which does prescribe sufficiently stringent penalties.	Affair (ILAB), Findings on the Worst Forms of Child Labor – India, 2022
	Violations of the Child Labor Act include imprisonment for up to 2 years and fines up to US\$ 700. <u>US Department of Labor, 2022</u>	
Regulation of recruitment	Country's government-sanctioned oversight mechanisms (regulations, accreditation schemes, inspection, etc.) of recruitment agents  India has not ratified the ILO convention 'C181 - Private Employment Agencies Convention, 1997 (No. 181)', which provides for the regulation of recruitment through private employment agencies for all categories of workers except seafarers. ILO NORMLEX	ILO NORMLEX

#### **Indicator Description Sources** Enforcement of **TIP Report US** Department of legislation for State, 2024, 2024 The US Department of State's 2024 TIP Report forced labor, Trafficking in assigns India a Tier 2 TIP Ranking, stating "The Persons (TIP) human Government of India does not fully meet the trafficking, Report minimum standards for the elimination of trafficking hazardous child but is making significant efforts to do so. The US Department of labor, migrant government demonstrated overall increasing efforts Labor Findings on worker compared with the previous reporting period; the Worst Forms of protections, therefore India remained on Tier 2." Efforts included Child Labor, 2022 recruitment and increased prosecutions and convictions of traffickers, and increased investigations and convictions of working bonded labor cases. conditions India did not meet the standards of the higher tiers for several reasons, including: a low conviction rate for trafficking crimes, shortcomings in victim protections including inadequate auditing programs of government run- or funded- shelters, failure to criminalize all forms of trafficking, and officials complicit in trafficking cases not being prosecuted. Labor trafficking is not explicitly addressed in law and anti-trafficking measures vary by state. Effective inter-state coordination is absent, and states did not consistently use relevant legal provisions. In addition, legal service providers and law enforcement were not adequately trained on the human trafficking legal framework. Caste discrimination by police and other officials, as well as corruption and official complicity further hinder labor inspections and law enforcement, with few investigations, prosecutions or convictions of complicit officials taking place. Human trafficking prosecutions and convictions were impaired as a result; 21 out of India's 36 states and union territories did not report identifying any victims or filing any cases in 2021 under the Bonded Labor

System (Abolition) Act (BLSA), despite ongoing

Indicator	Description	Sources
	reports of bonded labor in many of them. <u>US</u> <u>Department of State, 2024</u>	
	The number of labor inspectors is unknown, but likely to be inadequate, and there is alleged corruption and official complicity by police and government officials in trafficking and child labor. <u>US Department of Labor</u> , 2022	
	Child labor laws  Child labor is prevalent in several industries in India including Hand-Rolled Cigarettes, Brassware, Bricks, Carpets, Cotton, Cottonseed, Embellished Textiles, Fireworks, Footwear, Garments, Gems, Glass Bangles, Incense, Leather Goods/ Accessories, Locks, Matches, Mica, Rice, Sandstone, Silk Fabric, Silk Thread, Soccer Balls, Stones, Sugarcane and Thread/Yarn. Many of these industries also have been connected to forced labor and hazardous child labor.  India's legal framework does not adequately protect children from the worst forms of child labor. While	US Department of Labor Findings on the Worst Forms of Child Labor, 2022
	there are institutional mechanisms for the enforcement of laws and regulations on child labor, such as the Child Labor Act, the departments that enforce these regulations experience gaps in their operations that affect effective enforcement.  Penalties and the levels of enforcement of the Child Labor Act are not sufficient to discourage employers from hiring child labor, as it rarely leads to imprisonment and maximum fines of US\$700 are hardly imposed.  In 2018, the Trafficking of Persons (Prevent, Protection and Rehabilitation) Bill was passed in the lower house of Parliament but was not taken up by the upper chamber during the reporting period. A	
	imprisonment and maximum fines of US\$700 are hardly imposed.  In 2018, the Trafficking of Persons (Prevent, Protection and Rehabilitation) Bill was passed in the lower house of Parliament but was not taken up by	

Indicator	Description	Sources
	previous version and expands its scope to include care and rehabilitation to women and children, including Indian citizens outside of India and trans persons. The bill also aims to establish a National Anti-Trafficking Committee, which would be responsible for enforcing this legislation at the federal level and require reported human trafficking crimes to be fully investigated within 90 days. The bill was supposed to be put forward for a parliamentary vote in July-August 2021 but was delayed. While mentioned in the 2021 report, this is not further reported upon in the 2022 version of the Worst Forms of Child Labor report.	
	According to the most recent Findings on the Worst Forms of Child Labor, there is a lack of public information on how prosecutions and convictions involve child victims. Convictions appear to be low and maximum permissible penalty amounts are not imposed. US Department of Labor, 2022	
	Global Slavery Index (2023):  The 2023 Global Slavery Index (GSI) gives the Indian Government's response to Modern Slavery a 46 out of 100%, where a higher figure reflects more action taken by government.  Est. no. of people living in modern slavery: 11,000,000	Global Slavery Index's overall ratings
	Estimated prevalence of modern slavery (per 1,000 of population): 8.0  Vulnerability to Modern Slavery: 56/100  Government Response Score: 46/100	
	The 2023 GSI methodology states the Government Response Rating is "based on data collected on 141 indicators that are relevant to understanding how	

Indicator	Description	Sources
	each government is tracking towards achieving 42 activities organized into five milestones. Each milestone represents an aspect of a strong government response to modern slavery; for example, supporting survivors to exit and remain out of modern slavery".  Note: The GSI government response rating is presented as a percentage. A higher percentage reflects more action being taken and is assumed to	
	mean lower risk by the SSRT.	
	Documentation from national labor inspection and other law enforcement agencies  Official information on labor law enforcement efforts and the number of labor inspectors is unknown.  Research indicates that labor inspection training is inadequate, and that the number of inspections carried out is insufficient to cover India's workforce of over 523.8 million people. In addition, authorities have documented corrupt practices such as official misconduct and bribery at various levels of government, contributing to widespread impunity on alleged trafficking cases.	US Department of Labor, Findings on the Worst Forms of Child Labor – India, 2022
	The Committee of Expert on the Application of Conventions and Recommendations sent multiple direct requests for the Government of India to respond to in 2021, in regards to Labour Inspection Convention, 1947 (No. 81), Rural Workers' Organisations Convention, 1975 (No. 141), Tripartite Consultation (International Labour Standards) Convention, 1976 (No. 144), and the Maritime Labour Convention, 2006 (MLC, 2006).	ILO Committee of Expert on the Application of Conventions and Recommendations  Direct Request (CEACR) - adopted 2021, published 110th ILC session (2022), Labour Inspection
	The articles mentioned are as follows:	Convention, 1947

Indicator	Description	Sources
	<ul> <li>Status and conditions of labour inspectors</li> <li>The Committee praised the increased</li> </ul>	(No. 81) - India (Ratification: 1949)
	number of inspectors and requested information on the exact qualifications, recruitment process and training that labor inspectors were required to have.  • Coverage of workplaces by labour inspections. Self-inspection scheme.	Direct Request (CEACR) - adopted 2021, published 110th ILC session (2022), Rural Workers'
	Indian Government ensure that the self- certification of businesses did not interfere with labor inspections and that the Government provide information on the number of inspections, both routine	Organisations Convention, 1975 (No. 141) - India (Ratification: 1977)
	<ul> <li>and impromptu, and the number of inspections that were instigated due to a complaint.</li> <li>Free access of labor inspectors to workplaces</li> </ul>	Direct Request (CEACR) - adopted 2021, published
	<ul> <li>The Committee requested the Indian         Government to provide information on         the number of inspections that labor         inspectors requested aid from the police         force to gain access to the building.</li> <li>Labour Inspection Convention, 1947 (No. 81) - India</li> </ul>	110th ILC session (2022), Maritime Labour Convention, 2006 (MLC, 2006) - India (Ratification: 2015)
	<ul> <li>Right of all categories of workers to establish and join organizations. Muster assistants (workers that provide water and medical facilities at rural worksites).</li> <li>The Committee is resubmitting its request for information regarding the actual number of organizations of muster assistants available.</li> <li>Rural Workers' Organisations Convention, 1975 (No.</li> </ul>	
	<ul> <li>141) - India (Ratification: 1977)</li> <li>Impact of the COVID-19 pandemic.</li> <li>The Indian Government failed to implement certain provisions regarding</li> </ul>	

Indicator	Description	Courses
Indicator	Description seafarer's rights during the COVID-19	Sources
	·	
Evidence of forced labor, human trafficking, and hazardous child labor in the country	pandemic.  Maritime Labour Convention, 2006 (MLC, 2006) - India (Ratification: 2015)  General evidence from other sectors  According to the US Department of Labor, prevalent industries that exploit child labor, forced labor, and forced child labor in India are bricks, hybrid cottonseed, embellished textiles, garments, rice, and stones. Other sectors linked to child labor and/or forced labor are bidis, brassware, carpets, cotton, fireworks, footwear, gems, glass bangles, incense, leather goods, locks, matches, mica, sandstone, silk fabric and thread, soccer balls, sugarcane, thread/yarn, and tea.  India is a source and destination country for child trafficking, with in-country trafficking mostly for commercial sexual exploitation and forced labor in the domestic service or agriculture industry and states such as Bihar, Jharkhand, Chhattisgarh, and Odisha being major sourcing states.  Children are also recruited by non-state armed groups to participate in armed conflict. US  Department of Labor, 2022  The US Department of State's 2024 Trafficking in Person Report highlights the widespread nature of bonded labor in India.  Traffickers use debt-based coercion (bonded labor) to force people to work in agriculture, brick kilns, rice	US Department of Labor, Bureau of International Labor Affair (ILAB), Findings on the Worst Forms of Child Labor – India, 2022  US Department of State, 2024, 2024 Trafficking in Persons (TIP) Report
	mills, embroidery and textile factories, and stone quarries. Numerous commodities are connected to	
	the use of bonded labor, forced labor, or forced child	
	labor including, among others, agricultural and food	

Indicator	Description	Sources
	products such as biscuits, bread, coconut, cotton, eucalyptus, ginger, and sugarcane.	
	In addition, numerous states and regions are implicated, with the highest number of bonded labor victims identified in states Uttar Pradesh, Karnataka, and Tamil Nadu. Examples include indicators of forced labor identified in shrimp and aquaculture facilities in Andhra Pradesh, debt bondage connected to sugarcane harvesting and production in Maharashtra, forced labor connected to tea estates in northeast India, and <i>Sumangali</i> schemes in the Tamil Nadu spinning mill industry that may amount to bonded labor or result in women being subjected to sex trafficking.	
	Traffickers exploit children as young as eight years in forced labor in industries including agriculture, bangle making, begging, construction, domestic service, garment and textiles, as well as food-processing factories, floriculture, cotton, ship breaking, stone carving, and manufacturing of wire and glass. Nonstate armed groups recruit and use children in direct hostilities against the government and subject women and girls to sexual violence. US Department of State, 2024	

Table 1: India - Country-level indicators

## **India: Seafood industry-level indicators**

Indicator	Description	Sources
Direct evidence	Most of the direct evidence of forced labor and	Mongabay, Hard
of forced labor,	hazardous child labor in the Indian seafood sector is	<u>labor in India's</u>
human	slightly dated. Recent reports relating to the shrimp	fisheries: an
trafficking, and	industry are discussed in the aquaculture and	interview with
hazardous child	processing indicators.	researcher Divya
labor		Karnad, 2016
	A 2016 article on bonded migrant labor on industrial	
	fishing vessels in Maharashtra reports that workers	The Hindu, Child
	are stuck on vessels for at least one fishing season of	labour rampant in
	nine months. <u>Mongabay, 2016</u>	seafood units:
	A 2016 navys article in The Hindu reported on girls	police, 2016
	A 2016 news article in The Hindu reported on girls	Global March
	being rescued from seafood processing plants in	Against Child Labor,
	Kochi, Kerala. <u>The Hindu 2016</u>	CATCH OF THE
	An unnamed government study, referenced in a 2017	DAY, A Situational
	Global March report, states that 40% of the fisher	Analysis of
	population are children and many work in the sector	Trafficking and
	as child laborers. Activities include active fishing,	Forced Labour in
	sorting and grading, curing and drying, peeling,	the Global Supply
	processing work fish meal work, fish trading and value	Chains of the
	addition. Young people are engaged in canoe-based	Garment and
	purse-seine fishing in inshore waters of Kerala	Seafood Sector in
	jumping into the sea to drive fish into the nets, as well	Bangladesh, India
	as employed as cooks on multi-day fishing trips in	and Philippines,
	Tamil Nadu, guarding vessels, or loading and	2017
	unloading fish. In addition, girls above the age of	2017
	seven are involved in cleaning, salting and drying fish	Krishna, BM.,
	in Ganjam District, Orrisa. The report does not state	Kumar, MJ., Raju,
	whether this work is designated as hazardous but	P.D., 2018, Child
	does indicate that employment of children in marine	<u>Labour in The</u>
	fishing appears to be declining in India due to the	Fishery Sector in
	growing importance attached to education amongst	Visakhapatnam: A
	coastal fishing communities in Kerela and Tamil Nadu.	Pilot Study,
	Global March, 2017	<u>International</u>
		Journal for Research

Indicator	Description	Sources
	A 2018 study on child labor in fishing in Visakhapatnam revealed that children were being exploited as contract labor and engaged in hazardous activities like diving in harbor waters for scraping the rust or bio fouling organisms on the bottom of vessels. Children were also reported to be employed as bonded laborers as deck hands, kitchen help and errand boys. Krishna et al., 2018  The 2018 Trafficking in Person (TIP) Report identifies forced labor on fish farms in India but later TIP publications do not mention fish or seafood until the most recent 2024 report. US Department of State, 2018, US Department of State, 2024  The US Department of State's 2022 Findings on the Worst Forms of Child Labor report that children are employed in the seafood processing industry. US Department of Labor, 2022	in Engineering Application & Management (IJREAM) Vol 4 (4)  US Department of State, 2018, 2018 Trafficking in Persons (TIP) Report  US Department of State, 2024, 2024 Trafficking in Persons (TIP) Report  US Department of State, 2024, 7024 Trafficking in Persons (TIP) Report  US Department of Labor, Findings on the Worst Forms of Child Labor – India., 2022
ILO indicators of forced labor and ILO R190 definition of hazardous child labor	The 2024 TIP Report links indicators of forced labor, including failure to pay a minimum wage, restricted freedom of movement, and dangerous working conditions, to aquaculture facilities, particularly in Andhra Pradesh, and highlights the resulting risk of debt bondage among migrant workers and scheduled castes. US Department of State, 2024  A 2016 Reuters article reported on children working on fishing boats, carrying loads of catch, or cleaning fish and running errands as part of paying off their family's debt bondage. Reuters, 2016  A recently published scoping study on West Bengal's dry fish sector mentions child workers engaging in	US Department of State, 2024, 2024 Trafficking in Persons (TIP) Report  Reuters, Rescued from child labor, Indian fishermen's daughters ace school exams, 2016  Ghosh, Raktima, Jenia Mukherjee, Amrita Sen, Souradip Pathak,

Indicator	Description	Sources
	dried fish processing activities such as spreading,	Anuradha Choudry,
	sorting, and storing of fish. However, it is not clear	and Shreyashi
	whether the work is hazardous. Gosh et al., 2022	Bhattacharya. 2022.
		"Dried Fish in West
	A 2016 ITUC report referring to a 2015 study where	Bengal, India:
	72% of seafood processing workers in Gujarat and	Scoping Report."
	Tamil Nadu were working an excess of 12 hours per	DFM Working
	day. The report also details occupational health and	Papers. The
	safety issues in seafood processing plants, and the	<u>University of</u>
	studies conducted or referred to were in the	Manitoba & Indian
	provinces Gujarat, Tamil Nadu, and Kerala. The issues	<u>Institute of</u>
	reported included work-related health issues like	<u>Technology</u>
	back and joint pain due to long periods of time in	Kharagpur.
	awkward positions, hand and leg numbness, skin	International Trade
	issues like eczema, and respiratory issues and	Union
	bronchitis, injuries, as well as reports on problems	Confederation
	related to fertility. The health consequences in one of	(ITUC), Precarious
	the districts were attributed to extended exposure to	Work in the Asian
	cold environments, chlorinated water, and fish	Seafood Global
	protein related bioagents in the peeling sheds. The	Value Chain, 2016
	report further detailed cases of failure to provide	
	workers with proper personal protective equipment,	
	facilities not having provisions for emergency medical	
	attention and lack of medical benefits for workers.	
	International Trade Union Confederation (ITUC),	
	<u>2016</u>	
Fishing,	Labor-related fishing legislation	Department of
aquaculture and		Fisheries, 2023,
processing	The Ministry of Fisheries, Animal Husbandry &	<u>Annual Report</u>
regulations and	Dairying holds overarching responsibility for the	2022-2023
policies	fisheries and aquaculture sector, under which sits the	
	Department of Fisheries, which is responsible for	ILO NATLEX
	fisheries-related policies and schemes. The	<u>Database</u>
	Department's current vision for the fisheries sector	Global Slavery Index
	includes the wellbeing of fishers and fish farmers, and	(GSI) 2018 - Fishing
	the Department is responsible for the "Welfare of	<del>1 - 2 . 7 - 1 . 1 . 1 . 1 . 1 . 1 . 1 . 1 . 1 . 1</del>

Indicator	Description	Sources
	Fishermen and other Fisher-folk and strengthening of their livelihoods." in addition to environmental and markets-based issues. <u>Department of Fisheries</u> , 2023	
	The ILO NATLEX database lists one law relating specifically to fishers: a scheme for employment in the fishing industry under the Maharashtra Mathadi, Hamal and Other Manual Workers (Regulation of Employment and Welfare) Act 1969.	
	Additionally, the database shows two laws in force relating more generally to seafarers: the Seafarers' Identity Documents Convention (2003) and the Maritime Labor Convention (2006). ILO NATLEX Database	
	<ul> <li>The 2018 Global Slavery Index (GSI) for fishing: India:</li> <li>National Fisheries Policy (catch outside EEZ, distant water fishing, and subsidies)         <ul> <li>Medium Risk</li> </ul> </li> <li>Wealth and Institutional Capacity (GDP per capita, value landed per fisher, and unreported landings)         <ul> <li>High Risk</li> </ul> </li> </ul>	
	Aquaculture regulations and policies mainly target requirements around production, environment, and export, with no apparent specific labor-related requirements. General national labor related regulations and policies cover aquaculture and processing workers.	
Enforcement and implementation of industry-specific	Unknown. No specific information found on enforcement and implementation of industry specific regulation.	

Indicator	Description	Sources
regulations and policies		
Access to workplaces for third-party monitors (trade union representatives, on-board observers, etc.)	Unknown. No information was found on access to workplaces for third-party monitors in the seafood industry. However, India's recently implemented Industrial Relations Code in 2020, makes it more difficult for workers to unionize and imposes restrictions on their freedom to choose their own representatives and administer their own constitutions and rules. This could therefore impede access to trade unions.	Bhuta A. Imbalancing Act: India's Industrial Relations Code, 2020. Indian J Labour Econ. 2022;65(3):821- 830. doi: 10.1007/s41027- 022-00389-3. Epub 2022 Aug 25. PMID: 36042793; PMCID: PMC9409614C
Worker access to a functional grievance mechanism	The Indian government's Whistle Blowers Protection Act 2014 (Whistle Blower Protection Act) provides a legal mechanism for reporting of illegal, unethical, and illegitimate practices by members of an organization. However, the scope of the Act is limited to the public sector and has not been passed by central government. The Companies Act 2013 (Companies Act) mandates companies to have a whistleblower policy, but only for listed companies. There are no laws on protection of whistleblowers of private, unlisted companies or unincorporated entities and their employees, and employers are free to adopt whistleblower policy if they wish. International Employment Lawyer, 2022  According to a Human Rights Impact Assessment conducted by Elevate on the farmed shrimp industry in India, if an organization employs more than 100 workers, they are legally required to have active worker committees and internal complaint	International Employment Lawyer, Guide to Whistleblowing – India, 2022  Elevate, Human Rights Impact Assessment Farmed Shrimp in India, 2023  The Hindu, Explained   What is the PoSH Act and why has the Supreme Court flagged lapses in its implementation? 2023

Indicator	Description	Sources
	committees (ICC). Worker committees include representatives elected by workers and aim to raise specific workplace challenges. <u>Elevate</u> , 2023	Frontline, The new labour codes: Labour's loss, 2020
	In 2023, the Indian government introduced the Prevention of Sexual Harassment (POSH) Act, which requires employers with ten workers or more to set up an Internal Committee for the redressal of sexual harassment complaints and to regulate and administer complaints on sexual harassment.  However, the Act does not comprehensively address accountability, does not specify who is responsible for adherence to the act, and who is responsible when there is non-compliance. In addition, the law is largely inaccessible to women in the informal sector, and harassment cases are underreported. The Hindu, 2023  The Industrial Relations Code implemented in 2020 has applied a single industrial dispute tribunal in each State to address worker grievances and places a limit of three years for dispute resolution, which burdensome for workers. Frontline, 2020  Specific to seafood, seafood workers officially have access to MPEDA which provides governmental grievance mechanisms. Elevate, 2023	Elevate, Human Rights Impact Assessment Farmed Shrimp in India, 2023
Access to join a trade union	The right to form a union is both in India's Constitution and the legal code, as well as laws against discrimination. However, there are restrictions against forming a union, for example, a minimum of 100 people or 10% of the workforce is required. As well as in the State of Sikkim, the public can oppose the formation of a union. The Industrial	ITUC  Tax Guru, Corporate Law Articles – COLLECTIVE BARGAINING IN INDIA, 2023

**Indicator** Description Sources Relations Code forces the union to have their office Referenced in ILO, Precarious Work in bearers be employed in the business for the union. the Asian Seafood The union's right to strike is granted by law, however Global Value Chain, it is highly regulated. The regulations on strikes 2016 include a long prior notice period and "cooling off" period, an upheld court order that prevented a strike from being legal if it completely closed the business, as well as other restrictions related to strike busting. Regarding the threshold for collective bargaining negotiations, the recently implemented Industrial Relations Code requires 66% before a union can negotiate or perform its representative functions. In addition, the employer has no legal obligation to recognize a trade union or engage in collective bargaining. ITUC The rate of unionization in India is low. Many workers engaged in the informal sector lack legal protections and are not unionized. Additionally, there can be unbalanced bargaining power structures, where employers can resist workers' demands or simply not recognize trade unions and refuse to engage in collective bargaining. Tax Guru, 2023 A study dated from 2015 among 120 seafood processing workers in Gujarat and Tamil Nadu reported that none were involved in worker associations or trade unions. Whilst there was an acknowledgment among 63% of the surveyed workers that there may be workers involved with unions, none knew specifically about the associations or unions in their area. A different study further reported that rights to associate and to strike had been exercised in Kerala, where both fishers and seafood processing workers objected to violations of



Indicator	Description	Sources
	government-established minimum wages and objections of an increase in the number of vessels being able to operate within the Exclusive Economic ZoneReferenced in ILO, 2016	
Participation in voluntary schemes and implementation of comprehensive corporate policies and strategies to combat forced labor, human trafficking, and hazardous child labor	In relation to aquaculture production and processing, there are several voluntary schemes present in India such as Best Aquaculture Practices (BAP) and Aquaculture Stewardship Council (ASC) certification, which include indicators that address forced labor, human trafficking, and hazardous child labor within the organizations on both the production and processing level. According to ASC's Impacts  Dashboard, India ranks second in number of ASC shrimp farms certified, but fifth in terms of certified volume's produced.	Best Aquaculture Practices  Aquaculture Stewardship Council  ASC's Impact's Dashboard

Table 2: India - Seafood industry-level indicators

## **India: Aquaculture Indicators**

Indicator	Description	Sources
Indicator  Direct evidence of forced labor, human trafficking, and hazardous child labor	No direct evidence was found of human trafficking in shrimp aquaculture, but there is evidence of forced labor, and to a lesser extent, hazardous child labor in parts of the shrimp aquaculture sector.  Several indicators of forced labor reported by different sources indicate the menace of penalty and involuntariness, which together may amount to forced labor.  The Corporate Accountability Lab (CAL) interviewed more than 150 workers through the shrimp supply chain between 2021 and 2024. The investigation found that many shrimp supply chain workers, including hatchery and farm workers are internal migrants that are from lower castes. These migrants have little economic opportunities and are taken advantage of by employers in dangerous and abusive work.  Working conditions on shrimp farms are alleged to be hazardous and abusive. Hazards include working with chemicals without adequate PPE. Shrimp hatchery and farm workers report working more than 12 hours a day, and experience threats and intimidated, as well as sexual harassment against women. Workers that live on or near the farm stay in rudimentary housing at isolated locations, with some living conditions reported to be with dirty bathrooms and no restroom facilities. The report does note that conditions found on shrimp farms vary and that this depends on ownership. A civil society activist stated that migrant and local workers are also	Corporate Accountability Lab, Hidden Harvest: Human Rights and Environmental Abuses in India's Shrimp Industry, March 2024  Elevate, Human Rights Impact Assessment Farmed Shrimp in India, 2023  The Hindu, Six Migrant Workers Killed in an Explosion, 2021  Global March Against Child Labor, CATCH OF THE DAY, A Situational Analysis of Trafficking and Forced Labour in the Global Supply Chains of the Garment and Seafood Sector in Bangladesh, India and Philippines, 2017
	sometimes provided with large loans by shrimp farm owners, forcing them to work until debt is	

Indicator	Description	Sources
	paid. These workers are then restrained through harassment and intimidation and are in some cases threatened and not allowed to leave until debt is paid. CAL, 2024	
	These findings are supported by a 2023 Human Rights Impact Assessment on farmed shrimp in India, which found several indicators of forced labor in shrimp production and processing, but findings were not differentiated between the two stages. The assessment found cases where workers may have been unable to leave the site, excessive working hours and forced overtime without compensation, with indications of falsified records of workers' hours, and borrowing money from the site or labor agent to pay recruitment fees, which could result in debt bondage. In addition, there were reports of physical violence and sexual harassment at sites visited, with some workers reporting feeling unsafe, especially in the dormitories, and personal documentation being held by labor agents or by employers although they could get them back in almost all cases. Elevate, 2023	
	Separately, a news article in The Hindu reported the death of several migrant workers from Odisha due to an explosion while they were working on a shrimp farm in Andhra Pradesh, indicating unsafe working conditions. The Hindu, 2021	
	The 2023 Elevate HRIA report indicates that children consistently attend school, suggesting that child labor is unlikely. Elevate, 2023	
	Evidence in relation to hazardous child labor is dated. The Global March 2017 report on the situational analysis of trafficking and forced labor	

Indicator	Description	Sources
	in the seafood sector supply chains states that many girls in India are involved in giant tiger shrimp fry collection, which is considered hazardous as local water bodies are highly contaminated due to discharges of polluted effluent from nearby aquaculture farms.  However, the evidence for this claim is not cited. Nevertheless, the report goes on to highlight that the main problem is the lack of adequate data regarding child labor in the seafood sector, including aquaculture. Global March 2017  As whiteleg shrimp is not native to India and farms are supplied with broodstock from hatcheries, it is assumed that wild fry collection relates to native species such as giant tiger shrimp. It is worth noting that production of giant tiger shrimp represents only 4% of India's total shrimp production and nowadays giant tiger shrimp broodstock is mainly used for securing fry. Therefore, the extent of this child labor practice in the shrimp farming industry is likely very localized and is estimated to occur in less than 1% of India's shrimp production.	
ILO indicators of forced labor and ILO R190 definition of hazardous child labor	The 2024 TIP Report identifies observer reports of indicators of forced labor, including failure to pay a minimum wage, restricted freedom of movement, and dangerous working conditions, in some shrimp and aquaculture facilities (assumed to include shrimp aquaculture), highlighting Andhra Pradesh, and the resulting risk of debt bondage among migrant workers and scheduled castes. US Department of State, 2024	US Department of State, 2024, 2024 Trafficking in Persons (TIP) Report  Corporate Accountability Lab, Hidden Harvest: Human Rights and Environmental Abuses in India's Shrimp Industry, March 2024
	The CAL report states that there are indications of possible debt bondage among shrimp farm workers, with incidents reported by civil society	Boston Consulting Group, A Strategic Approach to





Indicator	Description	Sources
	that some children may assist in farm work to a level that impacts their attendance. Nevertheless, this was considered as the exception to the rule and child labor does not appear to be systemic and widespread. Key informants considered that shrimp farming had a positive contribution on children's education due to increased income resulting in more children being enrolled into schools. Education was found to be prioritized by shrimp farming families, and farmers appeared to be unwilling to resort to child labor.  MBA and ANU, forthcoming 2024	
	A study on occupational hazards of Indian shrimp farm workers found that of workers included in the study 93% reported physical hazards, 82% reported biological hazards, 77% reported chemical hazards, 71% reported ergonomic hazards and 71% reporting psycho-social hazards. Most common injuries reported were slips, falls and cuts (51%), electric shocks (44%), sunburn (41%), dehydration and headaches (40%) and fractures (27%). Around a third of workers also reported some form of chemical injuries, most commonly skin infections/breathing problems. Sharma et. al., 2023	
Labor supply in the domestic market	A socio-economic baseline study conducted by Monterey Bay Aquarium and the Department of Sociology and Social Work at the Acharya Nagarjuna University (ANU), forthcoming 2024, found that among the 100 farm owners assessed, that most farms employed less than 5 staff with only two farms employing more. Small owner operated farms may get occasional help from family. Around two-thirds of the farm owners interviewed employed family or friends, with the	Monterey Bay Aquarium and Department of Sociology and Social Work at the Acharya Nagarjuna University, Socioeconomic baseline study in shrimp farming areas in

Indicator Description Sources remaining using informal recruitment agencies. Andhra Pradesh, India, Recruiting workers was frequently ranked as the forthcoming 2024 fifth major challenge to farming operations, with KUMARAN, M., et al. labor cost being high and workers sometimes Prospective impact of quitting in middle of the culture season leaving Corona virus disease farms with difficult situations of having to hire (COVID-19) related and train new workers in the middle of the lockdown on shrimp growing season. Of the 100 farm owners aquaculture sector in interviewed, most were Hindu (93%), and 55% India-a sectoral and 44% belong to the Open Category (OC) and assessment. Aquaculture, to 'Other Backward Class' (OBC) respectively and 2021, 531: 735922. 1% belonging to Scheduled Castes or Scheduled Tribes. For the 100 farms workers interviewed, Arpita Sharma, Suchismita over 91% of the farm worker interviewees were Prusty, Rajiv Rathod, R. Hindu, 8% Muslim and 1% Christian. Furthermore, Arthi, Andrew Watterson 73% of the interviewed workers belong to OBC, & Lissandra Cavalli (2023) 12% to Scheduled Castes, 10% to other castes and Occupational hazards of 5% to Scheduled Tribes. There are, hence, more Indian shrimp farm workers than farmers belonging to Scheduled workers, All Life, 16:1, Castes and Scheduled Tribes. 2225762, DOI: 10.1080/26895293.2023.2 The typical worker on a shrimp farm in Andhra 225762 Pradesh was found to be in his twenties, unwed and living on his own or if wed, likely living away from his family when working on shrimp farms. Young people listed limited employment options, fluctuating prices, and declining revenue from shrimp farming as reasons to leave the industry, casting doubt on the long-term labor availability, although it is generally considered a good occupation. MBA and ANU, forthcoming 2024 A 2023 study on occupational hazards of Indian shrimp farm workers found of the 60 interviewees among shrimp farm workers in Andhra Pradesh, Maharashtra, Gujarat, and Tamil

Indicator	Description	Sources
	Nadu, that 77% were Hindu, 10% Muslim, and 13% were Christian. Over 50% of the workers were from (OBC), 33% from Scheduled Caste/Scheduled tribe, and 13% belonged to the 'General' category. Sharma et. al., 2023  Further reports of internal migrant workers being employed are in relation to the Covid-19	
	pandemic, which resulted in labor shortage issues due to travel restrictions. <u>Kumaran, M., et. 2021</u>	
Aquaculture Characteristics	Isolation of the site  Shrimp farming is concentrated in the coastal regions for its dependency on salt/brackish water for both whiteleg shrimp and giant tiger shrimp production.	Corporate Accountability Lab, Hidden Harvest: Human Rights and Environmental Abuses in India's Shrimp Industry, March 2024
	The CAL report hints at the remoteness of shrimp farms, where workers need to stay onsite. CAL, 2024	FAO, Rural Aquaculture in India, 1999
	However, it is unlikely for the sites to be extremely isolated given the fact that larger operations would need a steady supply of feed and seed, as well as perishability of the product requiring a sophisticated infrastructure maintain product quality. FAO, 1999	Boston Consulting Group, A Strategic Approach to Sustainable Shrimp Production in India THE CASE FOR IMPROVED ECONOMICS AND SUSTAINABILITY, 2020
	In terms of the level of registration, of the estimated 100,000 shrimp producers operational in India (Boston Consulting Group 2020), only 45,113 are reported to be registered by the CAA.  Department of Fisheries Annual Report 2022-23	Department of Fisheries, Ministry of Fisheries, Animal Husbandry and Dairying, Government of India, Annual Report 2022-
	Around 70,000 farms are registered by MPEDA, which is required if the product is intended for export. MPEDA	23.  MPEDA, Enrollment of Farms

Indicator	Description	Sources
	The State Department of Fisheries Registration can also register aquaculture farms. Government of Andhra Pradesh  It is unclear whether this registration entails any subsequent oversight in terms of labor inspections.  Child-adult ratio in aquaculture communities	Government of Andhra Pradesh, Department of Fisheries, AQUA SERVICE DASHBOARD  Elevate, Human Rights
	No exact information was found on the child-adult ratio in shrimp farming communities. However, since the majority of shrimp farms are family run operations, there is a possibility of children working alongside their family members.  The Elevate HRIA, though limited in its scope and unclear on whether finding related to farming or processing, found that children consistently attended school. Elevate, 2023  A socio-economic baseline study conducted by Monterey Bay Aquarium and the Department of Sociology and Social Work at the Acharya Nagarjuna University (ANU), forthcoming 2024, found that among their respondents of 100 farm owners, that of the married farmers, 97% are reside in nuclear families (up to four family members) and 14% of interviewed married and non-married farm owners live in joint families of five to 12 members. Children in aquaculture communities are reported to have access to and are enrolled in education, but some children may assist in farm work to a level that impacts their attendance. Nevertheless, this was considered as the exception to the rule. MBA and ANU, forthcoming 2024	Impact Assessment Farmed Shrimp in India, 2023  Monterey Bay Aquarium and Department of Sociology and Social Work at the Acharya Nagarjuna University, Socio- economic baseline study in shrimp farming areas in Andhra Pradesh, India, forthcoming 2024  Science, India defuses its population bomb: Fertility falls to two children per woman, 2021

Indicator	Description	Sources
	The average fecundity in rural areas India is reported to have reduced to an average of 2.1 in 2019-2021. Science, 2021	
Workforce Characteristics	The proportion of low-skilled migrant workers  Many workers on shrimp farms are reported to be migrants from other regions of Andhra Pradesh or nearby states such as Odisha or West Bengal.  CAL, 2024	Corporate Accountability Lab, Hidden Harvest: Human Rights and Environmental Abuses in India's Shrimp Industry, March 2024
	Research conducted by India's Central Institute of Brackishwater Aquaculture (CIBA) on the effects of COVID-19 on the shrimp industry, indicated that shrimp farms in the states Gujarat, Maharashtra and Andhra Pradesh were mostly manned by migrant laborers from eastern parts of India. Kumaran, M., et al. 2021  According to a socio-economic baseline study conducted by Monterey Bay Aquarium and the Department of Sociology and Social Work at the Acharya Nagarjuna University (ANU) in Andhra Pradesh in 2023, forthcoming 2024, among the 100 shrimp farm workers interviewed, around a third were internal migrant workers, mostly from poorer states in Eastern India like Odisha. Migrant workers were typically employed for a growth cycle and would return home between contracts to engage in other work such as agriculture. Although this is not as lucrative as work on shrimp farms, work on shrimp farms alone would not allow for sufficient income to sustain migrant workers or their families.  The study further found that of 100 farm owners and 100 farm workers interviewed, 37% and 31% respectively were illiterate, 16% were literate but	KUMARAN, M., et al. Prospective impact of Corona virus disease (COVID-19) related lockdown on shrimp aquaculture sector in India—a sectoral assessment. Aquaculture, 2021, 531: 735922.  Monterey Bay Aquarium and Department of Sociology and Social Work at the Acharya Nagarjuna University, Socio- economic baseline study in shrimp farming areas in Andhra Pradesh, India, forthcoming 2024  Arpita Sharma, Suchismita Prusty, Rajiv Rathod, R. Arthi, Andrew Watterson & Lissandra Cavalli (2023) Occupational hazards of Indian shrimp farm workers, All Life, 16:1,
	without formal education, 7% and 22% had	

Indicator	Description	Sources
	primary education, 27% and 13% studied above 10 <sup>th</sup> standard, and 13% and 27% completed high school. Farmers were overall more illiterate than workers, which is hypothesized to be the result of workers being younger and having benefited more from government school systems. MBA and ANU, forthcoming 2024  A 2023 study on occupational hazards of Indian shrimp farm workers from the states of Andhra Pradesh, Maharashtra, Gujarat, and Tamil Nadu mentions that out of the 60 shrimp farm workers interviewed, 58% were migrant workers, 14% had no formal education, 28% had primary level and 54% secondary level schooling. Other studies cited show that shrimp farmers have a comparably higher level of education than the shrimp farm workers, with examples ranging from shrimp farmers who were non-literate to those who were post-graduates. Sharma et. al., 2023  This is supported by a study of shrimp farmers in Tamil Nadu, which found that most shrimp farmers had 1 to 5 years' experience and had a secondary school to graduate level education. Angela and Sharma, 2023	2225762, DOI: 10.1080/26895293.2023.2 225762  Angela, S.A.D., and Sharma, A., 2023, Analysis of Socioeconomics and Occupational Dimensions of Shrimp Farmers of Tamil Nadu, Aquaculture Research
	Legal presence/regularity of migrant workers  There is no information on the legal presence of foreign migrant workers in the shrimp farming industry.  Internal migrant workers are more common. There are generally no restrictions on internal movement in India. Internal migration is covered by the Constitution and allows all Indian citizens the right to reside in any part of the territory of	PRS Legislative Research, Migration in India and the impact of the lockdown on migrants, 2020

Indicator	Description	Sources
	India, with only a few exceptions. <u>PRS Legislative</u> <u>Research, 2020</u>	
Recruitment and Contracts	Use of recruitment agents  A Human Rights Impact Assessment conducted by Elevate on shrimp production in India, says that farmers may source contractors to provide seasonal labor through labor brokers or directly through an already-established relationship,	Elevate, Human Rights Impact Assessment Farmed Shrimp in India, 2023  Monterey Bay Aquarium and Department of
	which tends to occur on smaller sites and with workers from the neighboring communities.  Elevate, 2023	Sociology and Social Work at the Acharya Nagarjuna University, Socio- economic baseline study in shrimp farming areas in
	Informal recruitment pathways appear to be common. According to a socio-economic baseline study conducted by Monterey Bay Aquarium and the Department of Sociology and Social Work at the Acharya Nagarjuna University (ANU) in	Andhra Pradesh, India, forthcoming 2024
	Andhra Pradesh in 2023, forthcoming 2024, 67% of the farmers employ family or friends while the rest recruited workers through informal intermediaries /agencies. Of the farm workers interviewed, 60% found their job themselves,	
	while 40% used an intermediary to find employment. Among those using an intermediary, more than half were recruited by informal recruitment agents and 22% were recruited by family and friends. Of the workers surveyed 27%	
	family and friends. Of the workers surveyed, 27% reported paying fees of up to Rs 10,000 to get recruited, with more than half paying between Rs 5,000 and Rs 10,000 (US\$ 59.8 – 119) and the remainder less than Rs 5,000. However, it is	
	unclear what exactly was being paid for. All farm workers indicated that they kept their original identity documents and almost all indicated that work and working conditions met expectations as	

Indicator	Description	Sources
	promised at the time of recruitment. Very few workers receive formal training upon employment, with 97% reporting receiving no training at all but learning from working with experienced workers. MBA and ANU, forthcoming 2024	
	Contract-and compensation- related regulations and practices  India does not have a set national minimum wage, but minimum wages can be established by state government or industry sector. Minimum Wage.org	Minimum Wage.org, International Minimum Wages, India Minimum Wage  Medinaceli, A et al (2023): Living Wage Update
	The living income estimate for rural Andhra Pradesh for a family of four was Rs 26,531 (US\$ 323) /month and gross living wage 16,999 (US\$ 207) /month in 2023. Medinaceli, A et al (2023)	Report: Rural Andhra Pradesh, India, 2023, Anker Research Institute, Global Living Wage Coalition and SDSN Bolivia
	According to the socio-economic baseline study conducted by Monterey Bay Aquarium (MBA) and the Department of Sociology and Social Work at the Acharya Nagarjuna University (ANU) in Andhra Pradesh in 2023, forthcoming 2024, the reported annual income for some shrimp farmers was substantially lower than the estimated living wage reported by Medinaceli <i>et al</i> (2023), indicating they are likely not able to live off shrimp farming alone.	Monterey Bay Aquarium and Department of Sociology and Social Work at the Acharya Nagarjuna University, Socioeconomic baseline study in shrimp farming areas in Andhra Pradesh, India, forthcoming 2024  Fairfood International,
	Key informants for the study indicated that the average salary for farm workers is approximately Rs 12,000/month, which is below the estimated living wage as reported by Medinaceli <i>et al</i> (2023).	Caught in a Trap, 2015  Arpita Sharma, Suchismita Prusty, Rajiv Rathod, R.
	Most farm workers regarded their income as somewhat sufficient (63%), with more than a quarter finding it fully sufficient (27%) and 10%	Arthi, Andrew Watterson & Lissandra Cavalli (2023) Occupational hazards of Indian shrimp farm

## **Indicator** Description Sources considering it insufficient. Payment was generally workers, All Life, 16:1, in cash and was reported to be stable and on time. 2225762, DOI: 10.1080/26895293.2023.2 Some workers reported payment through online 225762 systems and 1% reporting being paid through their recruiter. In terms of payment frequency, Angela, S.A.D., and Sharma, most workers reported to have received upfront A., 2023, Analysis of advances before the start of the culture cycle Socioeconomics and (53%), but this varied with 28% receiving daily Occupational Dimensions payments, 27% monthly payments, and 10% at of Shrimp Farmers of end-of-cycle payments. Since the COVID-19 Tamil Nadu, Aquaculture pandemic, there is a move towards the use of Research electronic payment systems more. Among the interviewed farm workers, 1% were full-time staff, 69% were contract workers and 30% were day laborers. Contracting was found to be highly informal. Among the 100 farm workers interviewed, 86% only have a verbal contract and 14% have no contract. Most workers worked dayshifts (73%) and a small proportion (2%) worked nightshifts, while some worked both (25%). Almost all workers reported to work all days of the week. Most workers can take sick leave (85%), with fewer workers able to take leave during festivals (45%) or to attend to family issues (24%). The study additionally found there be significant gaps in provision of sufficient PPE to farm workers. MBA and ANU, forthcoming 2024 Fairfood International report, based on research done by other NGOs, that workers' wages in the shrimp industry are not high enough to support a decent standard of living. Fairfood International, 2015. Whether this applies to both farming and processing is unclear in the report.

Indicator	Description	Sources
	The Occupational Health and Safety study (2023) on 60 shrimp farm workers from Andhra Pradesh, Maharashtra, Gujarat, and Tamil Nadu found that the workers resided on site, and they worked 8 to 12 hours per day, with one rest day per week, and were usually allowed one month of paid leave per year. The monthly income of shrimp farm workers ranged from US\$ 101 to 106, averaging at US\$ 103 per month, which is less than the average annual income of an Indian worker estimated at US\$ 113 per month for the year 2020–2021 according to the Ministry of Statistics & Programme Implementation Annual Report 2020-21. Shrimp farm workers in Tamil Nadu earn the highest average monthly income. In addition, some farms hire temporary daily waged workers for shrimp seed stocking activities. Sharma et. al., 2023	
	A study of shrimp farmers in Tamil Nadu found that shrimp farmers had a mean annual income 1.13 million rupees, equivalent to around US\$ 13,770, which is higher than the national and state-level per capita income, and higher than figures reported for shrimp farmers in other states. Angela and Sharma, 2023  In the case where shrimp farms are family-operated businesses, the level of income would depend on the success of the crop cycle and global demand for shrimp products offset against prices for input products such a seed and feed.	

Table 3: India - Aquaculture Indicators



## **India: Processing indicators**

Indicator	Description	Sources
Direct evidence	A combination of different reported abuses	Corporate
of forced labor,	indicates that there are conditions for forced	Accountability Lab,
human	labor in the shrimp processing industry. Several	Hidden Harvest: Human
trafficking, and	recent news reports furthermore highlight alleged	Rights and
hazardous child	cases of human trafficking and child labor (not	Environmental Abuses in
labor	confirmed as hazardous) in shrimp processing.	India's Shrimp Industry, March 2024
	Corporate Accountability Lab, which interviewed	
	150 workers throughout India's shrimp supply	Associated Press, AP
	chain, alleges that the highest risk of forced labor	finds grueling conditions
	is found in the shrimp processing sector, which	in Indian shrimp industry that report calls
	includes peeling sheds and processing plants. The	'dangerous and abusive',
	investigation found several indicators of forced	20 March 2024
	labor that indicate menace of penalty and	
	involuntariness, which together may amount to	The Outlaw Ocean, India
	forced labor.	Shrimp Rife with
	The investigation found cases of abuse of	Bondage, Hazards, and
	The investigation found cases of abuse of vulnerability, as most of the workers were internal	Stolen Wages, 2024
	migrants and Dalits or Adivasis, with little options	Elevate, Human Rights
	for other employment. This, in combination with	Impact Assessment
	the informal nature of employment and lack of	Farmed Shrimp in India,
	written contracts and pay slips, resulted in	2023
	increased vulnerability for workers.	
	mercused varietusiney for workers.	The Hindu, 25 September
	It further alleges incidents of debt bondage.	2023, 'Poverty-stricken
	Recruiters were reported to target vulnerable	minors from other States
	populations for recruitment and provide loans to	found labouring in aqua
	recruited workers. Reported loans were up to up	processing units in Andhra Pradesh'
	to 100,000 INR (US\$ 1,240) and required workers	Andma i Tauesii
	to stay in their employment until they paid back	The Hindu, 23 September
	their loans plus interest. Women tend to take on	2023, 'Child welfare
	these loans as there are limited financial options	officials inspect aqua
	available to them.	unit in A.P. where minor

Migrant workers were housed in company owned hostels that were found to be unhygienic and overcrowded. Married couples were not allowed to stay together Additionally, workers staying in these accommodations were restricted in their movement, being allowed to leave once or twice a month with guards and wardens controlling access in and out of the facilities. In some cases, there were alleged incidents of monitoring workers on- and offsite.

Working conditions in the factories were allegedly abusive and dangerous with high risk of injury, with the cold environment worsening conditions such as asthma, frostbite, rashes, and sores. Other conditions mentioned were dehydration and malnourishment, ammonia leaks as well as verbal abuse when not meeting production targets. Multiple workers reported working excessive overtime hours, such as working 30 weeks in a row and workers, especially migrant women, not being paid for overtime.

Lastly, workers were allegedly found to be threatened and intimidated by recruiters and company employees, with a risk of losing their jobs if workers spoke with investigators.

Separately a union leader of the sector alleged that sexual harassment of women in processing plants in rampant, as they fear to lose their job if they complain. CAL, 2024

A 2024 Associated Press article, which followed in lieu of initial findings from Corporate Accountability Lab, also alleges to have found workers facing dangerous and abusive labor conditions. The article reports cases of women working in peeling sheds without appropriate PPE resulting in frostbite and infections and overall

girl was found dead on Sept.20'

The Hindu, 25 September 2023, 'Over 20 'minor' girl workers found in aqua company in Krishna district'

Reuters, 21 September 2020, 'India's Nobel laureate fears upsurge in child labour as pandemic shrivels economy'

The Times of India, 13
September 2020

unsanitary and dangerous working conditions. Workers worked 10-hour shifts, with women having been reported to miscarry due to the heavy work. In addition, it is reported some workers receive less than US\$ 4 per day (which is below minimum wage), are not paid overtime and must pay recruiters 25 cents out of their salaries as well as other provisions such as transport and lunch. Many of the workers have no formal contracts and no recourse. The accommodation provided for workers was reported to be unhygienic and over-crowded and some workers reported to be locked in guarded hostels when not working or restricted in their movements.

Associated Press, 2024

Based on the claims of whistleblower on cases of export of known unsafe product and presence of human right abuses in a shrimp processing plant, the Ocean Outlaw also produced a separate series of articles at the start of 2024. One of these articles covered the allegations that workers at a processing plant were underpaid, not allowed to leave without permission, and often living in rundown conditions. There was evidence of excessive working hours, with a labor contractor's papers indicating they had worked 360 days in a year and staff being paid less than minimum wage, although the processing company in question denied these interpretations. The whistleblower also indicated overdue payment of wages and migrant workers not being able to go home for a long period of time. In terms of living arrangements and conditions, the provision of bedding was insufficient for the number of workers onsite, and the company had

discontinued providing sanitary napkins because of alleged misuse. <u>The Ocean Outlaw, 2024</u>

The above findings are supported by a Human Rights Impact Assessment report on farmed shrimp in India found several indicators of forced labor in shrimp farming and processing, but findings were not differentiated between the two stages. The assessment found cases where workers may have been unable to leave the sites, excessive working hours and forced overtime without compensation with indications of falsified records of workers' hours, borrowing money from the site or labor agent to pay recruitment fees which could result in debt bondage, reports of physical violence and sexual harassment at sites visited with some workers reported feeling unsafe, especially in the dormitories, and personal documentation held by labor agents or by employers although they could get them back in almost all cases. Elevate, 2023

In relation to alleged cases of human trafficking and child labor, the CAL 2024 also reported widespread use of teenage girls in shrimp processing plants. CAL, 2024

A September 2023 news article reported on the rescue of children from a fish processing and packing plant in Pamarru, Krishna district in Andhra Pradesh, describing it as a "major inter-State child trafficking case". According to the article, a raid was conducted at the fish processing plant by the officials of the State Commission for Protection of Child Rights (SCPCR) and the Child Welfare Committee (CWC). Around 30 workers suspected to be minors were found at the unit. The children had migrated for work from several

areas including the Andhra-Odisha Border,
Odisha, and West Bengal. Two girls stated they
were working to support their families. One girl
described being hired by an intermediary, with
wages being transferred to her parents. Some of
the workers at the company were engaged in
grading shrimp, while others worked in the
processing and packing unit. The company
reportedly buys farmed shrimp from several
districts in Andhra Pradesh for processing and
export. The Hindu, 25 September 2023

The suspicious death of 13-year-old, Monalisa Khatun from West Bengal was reported at the same processing unit in Pamarru earlier in September. While the death was not connected to work at the processing unit, upon investigating, officials said that workers were living in "pathetic conditions" near the work site. The Hindu, 23 September 2023

According to a community social worker, Monalisa had been staying with her mother, and the company claimed she was not a worker. <u>The</u> <u>Hindu, 25 September 2023</u>

A news article from 2020 highlights a potential case of child labor in shrimp processing, stating "[Kailash] Satyarthi's organisation backed by police rescued dozens of girls during a raid on a shrimp processing unit in western India." Reuters, 21 September 2020

Another news report provides further information on the 2020 incident, stating that Gujarat and Jharkhand police rescued 20 girls from a shrimp processing unit in Makhinga, Surat district in Gujurat. The girls were reportedly

trafficked from Jharkhand to Gujurat. The processing unit had checked the age of the girls and found five of them to be minors, which resulted in the company refusing to employ those girls and buying them return tickets. The father of one of the girls filed a complaint against the labor contractor who had taken the girl to Surat. The police examined the documents of other workers and found that 14 workers were girls using forced Aadhaar identity cards. The Times of India, 13

September 2020

ILO indicators of forced labor and ILO R190 definition of hazardous child labor The 2024 TIP Report identifies observer reports of indicators of forced labor, including failure to pay a minimum wage, restricted freedom of movement, and dangerous working conditions, in some shrimp facilities (assumed to include shrimp processing), particularly in Andhra Pradesh. <u>US</u>
<u>Department of State, 2024</u>

An outdated report indicates the presence of children working in poor conditions in shrimp preprocessing plants. WWF & Accenture, 2013 This is also touched upon by a briefing from Envisage (2022) that indicates labor violations relating to child labor are particularly present in 'tier 2' processing operations, which include peeling sheds, though the information appears to be more related to fisheries. Envisage, 2022

A news article from 2021 reports the governor from Andhra Pradesh intervening to aid / "free" migrant workers from their contractor who were working in a shrimp processing unit, which could be evidence of forced labor. The Hindu, 2021

There are some recent news articles that describe incidents of unsafe working conditions in shrimp processing plants, with people reportedly

US Department of State, 2024, 2024 Trafficking in Persons (TIP) Report

WWF & Accenture,
FUTURE PROOFING
SHRIMP PRODUCTION,
Transition to Controlled
Intensification, 2013

Envisage, SHRIMP PROCESSING AND RELATED SECTORS IN INDIA. 2022

The Hindu, A.P. Governor steps in to aid migrant workers, 2021

Times of India, Seven held for gas leak in prawn processing plant in Odisha, 2019

Times of India, Odisha: 28 people fall ill after ammonia gas leak in

	becoming ill due to toxic fumes. <u>Times of India</u> , 2019, <u>Times of India</u> , 2022	prawn processing plant in Balasore, 2022
Processing Characteristics	Processing stage  Processing units vary from non-integrated to fully integrated facilities, depending on whether they conduct full processing or only pre-processing activities. Pre-processing includes activities such as cleaning, peeling, washing, and icing, while processing consists of grading, packing, weighing, and freezing. Separate pre-processing activities tend to occur in small scale units that are labor intensive, while processing requires large-scale, capital-intensive units. International Trade Union Confederation (ITUC), 2016  Exporting companies are reported to outsource the lower-value, labor-intensive processing tasks to peeling sheds. A few companies own peeling sheds, but the majority are operated by small enterprises. Some peeling sheds operate based on resource availability. Processed shrimp is exported as Individually Quick Freezing (IQF), to retailers and wholesalers, or is shipped overseas for value-addition. Peeled shrimp is a common final product for export. CAL, 2024  Processors in Andhra Pradesh and Odisha are focused on secondary processing, which includes peeling and de-heading, for US and EU markets, with a greater focus on volume rather than quality. ILO, 2023	International Trade Union Confederation (ITUC), Precarious Work in the Asian Seafood Global Value Chain, 2016  Corporate Accountability Lab, Hidden Harvest: Human Rights and Environmental Abuses in India's Shrimp Industry, March 2024  ILO, Value chain analysis of the food processing sector in Andhra Pradesh and Odisha, 2023
	Consolidation and vertical integration  The level of consolidation in India's aquaculture shrimp supply chain varies from fully vertically integrated to non-integrated and fragmented.  The processing industry is fragmented, with	Boston Consulting Group, A Strategic Approach to Sustainable Shrimp Production in India THE CASE FOR IMPROVED

	I	T
	limited examples of companies being vertically integrated. The two largest vertically integrated companies, Avanti Feeds and CP India, own farms, or contract directly with individual farmers, own feed mills, hatcheries, and processing facilities, and manage their exports. Boston Consulting Group 2020	ECONOMICS AND SUSTAINABILITY, 2020
	Domestic versus export  Whiteleg shrimp and giant tiger shrimp are predominantly produced for exports, with approximately 90% of the processed shrimp being exported. Boston Consulting Group, 2020  Reports on the level of domestic consumption differ, with some saying that consumption of primarily of fresh shrimp has been increasing to around 20% of total production (Boston Consulting Group 2020), whilst other stating domestic consumption remains low at 50 thousand metric tons per year. Global Seafood Alliance, 2020  Interviewees for an ILO analysis study on the shrimp value chain mentioned that the majority of shrimp produced in Andhra Pradesh and Odisha is for export and estimates that only 1% is sold domestically. ILO, 2023	Boston Consulting Group, A Strategic Approach to Sustainable Shrimp Production in India THE CASE FOR IMPROVED ECONOMICS AND SUSTAINABILITY, 2020 Global Seafood Alliance, How India became the world's top shrimp producer, 2020 ILO, Value chain analysis of the food processing sector in Andhra Pradesh and Odisha, 2023
Workforce Characteristics	Skilled versus low-skilled  According to Fairfood International, work in the shrimp processing industry in India is low-skilled work. This slightly contradicts with a study on the impact of the Coronavirus (COVID-19) lockdown, that states that most of the skilled workers employed in processing plants are migrant workers who went back home during the lockdown resulting in manpower issues. However,	Fairfood International, Caught in a Trap, 2015  KUMARAN, M., et al. Prospective impact of Corona virus disease (COVID-19) related lockdown on shrimp aquaculture sector in India-a sectoral

neither study provides a definition or justification of their chosen terminology. <u>Fairfood</u>
<u>International, 2015</u>, <u>Kumaran, et al. 2021</u>

A 2016 ITUC report describes how women working in pre-processing centers are "disproportionately from economically backward classes" and are predominantly confined to floor level work with very few operating at a supervisory or technical role. It further states that because of a lack of regulation at pre-processing level, they are particularly vulnerable to abuses at work. International Trade Union Confederation (ITUC), 2016

<u>assessment</u>. *Aquaculture*, 2021, 531: 735922.

International Trade
Union Confederation
(ITUC), Precarious Work
in the Asian Seafood
Global Value Chain, 2016

The proportion of women in the workforce

The 2024 Hidden Harvest Report by CAL states that processing companies mainly hire women to de-head, peel, and sort shrimp. CAL, 2024

The AP and Outlaw Ocean articles both discuss women working in processing plants, but do not give a clear proportion. <u>Associated Press, 2024</u>, <u>The Outlaw Ocean, 2024</u>

A targeted study done by Elevate indicates that of the two processing sites that were visited with approximately 500 to 1,000 full-time employees each in Andhra Pradesh, 65% of the workers were women. Elevate, 2023

This seems to match a recent ILO study on the shrimp processing sector in Andhra Pradesh and Odisha that estimates that 70–80% of the workforce are women. The report further mentions that roles tend to be gendered, with women usually responsible for peeling and deheading the raw shrimp. ILO, 2023

Corporate
Accountability Lab,
Hidden Harvest: Human
Rights and
Environmental Abuses in
India's Shrimp Industry,
March 2024

Associated Press, AP finds grueling conditions in Indian shrimp industry that report calls 'dangerous and abusive', 20 March 2024

The Outlaw Ocean, India Shrimp Rife with Bondage, Hazards, and Stolen Wages, 2024

Elevate, Human Rights Impact Assessment Farmed Shrimp in India, 2023 More dated studies also report that women comprise the dominant work force in preprocessing and processing facilities, although some studies were not conducted in the dominant aquaculture production states.

The Fairfood International (2015) report details that due to the competitiveness in exporting sectors in the developing world, including seafood processing, costs are being pushed down to workers at the bottom of the supply chain, and that women make for a low-paid, compliant, elastic, and replaceable work force. This increases the vulnerability of women to abuses and job insecurity, as they are not recognized as important to the booming shrimp industry. Fairfood International, 2015

Fairfood International, Caught in a Trap, 2015

ILO, Value chain analysis of the food processing sector in Andhra Pradesh and Odisha, 2023

The proportion of migrant versus local workers

The 2024 Hidden Harvest Report by CAL states that many shrimp workers are internal migrants from regions where there are few employment options, either from other regions of Andhra Pradesh or nearby states such as Odisha or West Bengal, although the report does not offer a proportion in terms of migrant versus local workers, nor does it distinguish between farm and processing workers. Internal migrants are reported to face barriers in terms of language, social isolation, discrimination, and harassment, CAL 2024

The Outlaw Ocean Project article describes up to 650 migrant workers being housed at the processing plant, but it is unclear how large a share this is. The Outlaw Ocean, 2024

Corporate
Accountability Lab,
Hidden Harvest: Human
Rights and
Environmental Abuses in
India's Shrimp Industry,
March 2024

The Outlaw Ocean, India Shrimp Rife with Bondage, Hazards, and Stolen Wages, 2024

ILO, Value chain analysis of the food processing sector in Andhra Pradesh and Odisha, 2023

Fairfood International, Caught in a Trap, 2015 The proportion of local labor in shrimp processing NISHCHITH, V. D. Role is currently estimated to be 50:50 migrant to local and status of women workers. ILO, 2023 employed in seafood processing units in India. Research conducted at shrimp processing plants In: International in Gujarat found that 46% of the respondents Symposium on Women were migrant workers, with 66% of the migrant in Asian Fisheries, women workers originating from Kerala and 32% ICLARM Contribution. from Tamil Nadu. Fairfood International, 2015 2001. A more dated study from 2001 found that most of the women workers in shrimp processing plants in Andhra Pradesh, Orissa, and Tamil Nadu were internal migrants from Kerala. Kerala women workers were preferred over local workers due to their skills in handling raw material, willingness to work at odd hours and festivals, and maintaining hygienic conditions. Nishchith, 2001 The proportion of minority or indigenous workers Corporate Accountability Lab, The 2024 Hidden Harvest Report indicates that Hidden Harvest: Human most workers across the Indian shrimp supply Rights and chain are from marginalized lower caste groups Environmental Abuses in such Dalit, Adivasi, or fisher communities. These India's Shrimp Industry, minorities are particularly vulnerable to abuse March 2024 resulting from (historical) practices such as exclusion from well-paying jobs, social exclusion, restrictions in accessing education and healthcare, and caste-based physical violence. CAL 2024 The proportion of temporary and contract versus ILO, Value chain analysis permanent workers of the food processing sector in Andhra Pradesh According to a 2023 ILO report, many workers and Odisha, 2023 join shrimp processing factories on a contractual basis, with labor required to be present at any ITUC, Precarious Work in given time depending on processing unit demand. the Asian Seafood Global Value Chain, 2016 ILO, 2023

The 2024 Hidden Harvest Report by CAL states that many shrimp workers are internal migrants from regions with few employment options either from other regions of Andhra Pradesh or nearby states such as Odisha or West Bengal, although the report does not offer a distinction between farm and processing workers. CAL, 2024  Intra-state migrant workers in Andhra Pradesh, the largest shrimp producing state, mostly come from Srikakulam district to work in Visakhapatnam. Interstate migrants are reported to come from Odisha, Assam and Kerela. Workers often come from nearby villages or districts in search of work, and it has been mentioned through interviews with labor union representatives that the workers predominantly come from lower-income households. ILO, 2023  Migrant worker language (vs. dominant language in the industry)	Hidden Harvest: Human Rights and Environmental Abuses in India's Shrimp Industry, March 2024  ILO, Value chain analysis of the food processing sector in Andhra Pradesh and Odisha, 2023  Ministry of Education, no date.
conditions such as hours and number of workers needed. International Trade Union Confederation (ITUC), 2016  Workers' origins	Corporate Accountability Lab,
permanent positions, and that most workers were hired daily wage workers. The 2013 study found that most shrimp processing workers in this area were women employed as daily wage workers.  The ITUC report further indicates that women are hired as casual, unskilled labor and do not receive job security and social security benefits and that the practice, in case of pre-processing, allows for raw material availability to determine working	
The 2016 ITUC reports defers to 2015 and 2013 studies, where the former found that only 15% of 120 workers in Gujarat and Tamil Nadu held	

There are 22 official regional languages in India.  Ministry of Education  The main languages spoken in shrimp aquaculture production and processing states are Telugu (Andhra Pradesh, Pondicherry), Bengali (West Bengal) Gujarati (Gujarat), Tamil (Tamil Nadu, Pondicherry), Odia/Oriya (Orissa), Marathi (Maharashtra), Malayam (Kerela, Pondicherry), Kannada (Karnataka). New World Encyclopedia, 2022  Inter-state migrants face issues such as language barriers depending on their state of origin and	New World Encyclopedia, Languages of India, 2022  Corporate Accountability Lab, Hidden Harvest: Human Rights and Environmental Abuses in India's Shrimp Industry, March 2024
destination.  Based on interviews from the 2024 Hidden Harvest report, migrant workers and local workers from Andhra Pradesh often do not have a common language. Local workers primarily speak Telugu, and migrant workers mainly speaking languages from their regions. CAL, 2024  GDP per capita of processing country and main	Ministry of Statistics &
worker source country  Workers are internally migrant within India, so India's GPD per capita applies. The net state domestic product per capita in 2021-2022 for Andhra Pradesh was ₹ 192,587 (US\$ 2,330), while for Odisha, Assam and Kerela this was ₹ 128,873, ₹ 102,965, ₹ 124,798 (US\$ 1,560, 1,245, 1,510) respectively. Ministry of Statistics & Programme Implementation, 2023	Programme Implementation, 2023
Legal presence/regularity of migrant workers  There is no information or indication of foreign migrants working in the shrimp processing sector. Internal migrants are common.	PRS Legislative Research, Migration in India and the impact of the lockdown on migrants, 2020

There are in general no restrictions on internal movement within India. Internal migration is covered by the Constitution and allows all Indian citizens the right to reside in any part of the territory of India, with only a few exceptions. According to a 2011 census, 38% of the Indian population was migrant, of which 99% was internally migrant and only 1% comprised migrants from other countries. Of the internal migrants, a distinction is made between inter (between) and intra (within)-state migrants, with intra-state migrants accounting for 88%. Internal migrant workers face challenges through lack of social security and health benefits and lack of portability of state-offered benefits such as food provisions. PRS Legislative Research, 2020

ILO, Value chain analysis of the food processing sector in Andhra Pradesh and Odisha, 2023

In addition, internal migrants may also face difficulties through speaking different local languages.

The proportion of local labor in shrimp processing is currently estimated to be 50:50 migrant to local workers. <u>ILO, 2023</u>

The ability of migrant workers to change jobs

Although internal migrant workers are not restricted to a work visa, and the Indian Constitution affords all Indian citizens the right to reside in any part of the territory of India, it is unlikely that workers are bound to a specific employer as part of their work permit.

However, the 2024 Hidden Harvest CAL report and AP article both indicate that migrant workers in the shrimp processing industry have little options for other types of employment, making the ability to switch jobs difficult from a socioeconomic and cultural perspective despite Corporate
Accountability Lab,
Hidden Harvest: Human
Rights and
Environmental Abuses in
India's Shrimp Industry,
March 2024

Associated Press, AP finds grueling conditions in Indian shrimp industry that report calls 'dangerous and abusive', 20 March 2024

	oppressive conditions and desire to leave. CAL,	
	2024, Associated Press, 2024	
	<u>2021, 713300141041 1 1 2 3, 2021</u>	
Recruitment and Contracts	Use of contractors and recruitment agents	<u>Corporate</u>
		Accountability Lab,
	According to the 2024 Hidden Harvest report,	Hidden Harvest: Human
	shrimp processing workers are rarely given	Rights and
	contracts, timesheets, pay slips or access to	Environmental Abuses in
	working hour records and many remain "daily	India's Shrimp Industry,
	wage laborers" without any access to health	March 2024
	insurance, social security, or vacation days. Most	
	workers are hired through recruitment agents,	Associated Press, AP
	who are long-term industry workers and recruit	finds grueling conditions
	workers from their hometowns. Recruitment fees	in Indian shrimp industry
	are common and are paid upfront or for each day	that report calls
	of work and some workers reported paying a	'dangerous and abusive',
	month's worth of salary as a recruitment fee.	20 March 2024
	Processing companies in turn pay a commission	
	for each worker, ranging from INR 5 (US\$ 0.06) to	ILO, Value chain analysis
	INR 10 (US\$ 0.12) per worker. <u>CAL, 2024</u>	of the food processing
		sector in Andhra Pradesh
	The 2024 Associated Press Article also alleges	and Odisha, 2023
	that most workers have no contract and that	International Trade
	workers must pay recruiters 25 cents / day to	
	work in peeling sheds. <u>Associated Press</u> , <u>2024</u>	Union Confederation  (ITLIC) Propertions Work
	Asserting to a recent II O study most weathers	(ITUC), Precarious Work in the Asian Seafood
	According to a recent ILO study, most workers are hired via contractors. Interviewees for the	
		Global Value Chain, 2016
	study mentioned that companies preferred this	Fairfood International,
	system as they are not required to manage labor	Caught in a Trap, 2015
	law compliance of worker benefits such as	<u>Caagiiciira 11ap, 2015</u>
	insurance, Employees' Provident Fund and	
	Employees' State Insurance Corporation	
	contributions. The lack of formal documentation	
	and the absence of labor cards prevents workers	
	from qualifying for social security benefits from	
	the labor department. The report further states	
	that interviewees mentioned that many owners	
	have connections with local politicians, which	

results in fewer and less stringent labor inspections being applied. <u>ILO</u>, <u>2023</u>

This aligns with earlier, more dated reports that indicate most workers in processing plants, especially daily/temporary workers, are hired through contractors or employment agencies. International Trade Union Confederation (ITUC), 2016, Fairfood International, 2015

Temporary workers typically do not have access to social security and company benefits. <u>Fairfood International</u>, 2015

## Compensation method

The 2024 Hidden Harvest Report indicates that workers are paid in cash or directly into bank accounts at the end of the month. A lack of recordkeeping for working hours and pay slips leaves workers unaware of any discrepancies and unable to dispute them. Most workers are paid below the minimum wage and only a few reported having Provident Fund (PF) and Employees' State Insurance (ESI) card, which is compulsory under Indian law for facilities with a certain number of workers and where workers are paid less than a certain amount. Most workers earn between INR 8,000 (US\$ 96.38) and INR 12,000 (US\$ 144.57) per month, which should entitle them to receive PF and ESI, although workers reported to receive neither.

Hiring informal workers saves processing companies from having to pay benefits. According to some of the interviewees, ""Workers who have ESI/PF get INR 450-500 (US\$ 5.41-6.02) per day. And workers who don't have ESI/PF, the daily wagers get only INR 300-350 (US\$ 3.61-4.21)."

Corporate
Accountability Lab,
Hidden Harvest: Human
Rights and
Environmental Abuses in
India's Shrimp Industry,
March 2024

Associated Press, AP finds grueling conditions in Indian shrimp industry that report calls 'dangerous and abusive', 20 March 2024

The Outlaw Ocean, India Shrimp Rife with Bondage, Hazards, and Stolen Wages, 2024

ILO, Value chain analysis of the food processing sector in Andhra Pradesh and Odisha, 2023

The Hindu, 25 September 2023, 'Poverty-stricken

Similarly, "official" workers have additional benefits, including bonuses for working many days in a row. One recruiter explained, "There are no holidays. However, if a worker works for 25 days continuously, the company gives three days extra salary. This is only for PF and ESI card holders." CAL, 2024

The 2024 Associated Press Article also alleges that interviewed workers reportedly received between US\$ 3 to US\$ 4 per day, which is less than the minimum wage. Associated Press, 2024

The Outlaw Ocean article describes situations of late payment of wages. <u>The Outlaw Ocean, 2024</u>

According to a 2023 ILO report, payment is based on piece rate systems where workers typically earn 60–100 rupees (US\$0.77–1.15) per kilogram of shrimp processed, with an average processing capacity of a worker of 30 kg per hour. This results in wages of between 10,000–16,000 rupees (US\$128 and US\$205) per month. Night shift work is paid at an additional rate of 150 rupees (US\$1.92) per day. ILO, 2023. A 2023 news article confirms this with a woman migrant worker describing being paid 12,000 rupees per month for work in a processing and packing unit in Andhra Pradesh. The Hindu, 25 September 2023

A more dated ITUC report, also identified the compensation method at pre-processing facilities during a 2014 study, as a piece rate system with more than half of the workers earning wages ranging from 100- Rs. 200 per day (US\$1,22 - 2,44), and one fourth earning 200-300 RS per day (US\$2,44 - 3,66). It further details women peelers from Kerela going on strike in 2015 to protest

minors from other States found labouring in aqua processing units in Andhra Pradesh'

International Trade
Union Confederation
(ITUC), Precarious Work
in the Asian Seafood
Global Value Chain, 2016

Fairfood International, Caught in a Trap, 2015 receiving less than 20 RS (US\$ 0,24) per kg instead of the government mandated piece-rate wage of 26 RS (US\$ 0,32) per kg. A large share of workers did not receive legally mandated social security benefits like Provident Fund (PF) accounts and Employees' State Insurance (ESI) cards. International Trade Union Confederation (ITUC), 2016

The Fairfood International report states that current wages in India were only about 70% of a living wage and Indian workers reported wages right at the minimum wage levels. Excessive overtime work was used as evidence that wage rates were too low, and the report suggests that overtime was required to earn enough. However, the ITUC report states that in their 2015 study, regular wages were received regardless of hours worked. Fairfood International, 2015

Table 4: India - Processing indicators

## References

<sup>1</sup> Certification and Ratings Collaboration, 2023, Sustainable Seafood Data Tool. Available at <a href="https://certificationandratings.org/data-tool-2022/">https://certificationandratings.org/data-tool-2022/</a> [Accessed on 18 April 2023].

https://comtradeplus.un.org/TradeFlow?Frequency=A&Flows=X&CommodityCodes=0306&Partners=842&Reporters=699&period=all&AggregateBy=none&BreakdownMode=plus [Accessed on 7 January 2023].

- <sup>v</sup> MPEDA, Marine Products Exports. Available at <a href="https://mpeda.gov.in/?page\_id=438">https://mpeda.gov.in/?page\_id=438</a> [Accessed on 7 January 2023].
- vi Expert Business, 2017, Shrimp Exports from India Top 2017 Shrimp Exporters in India (exportgenius.in) [Accessed on 7 January 2023].
- vii Certification and Ratings Collaboration, 2023, Sustainable Seafood Data Tool. Available at <a href="https://certificationandratings.org/data-tool-2022/">https://certificationandratings.org/data-tool-2022/</a> [Accessed on 18 April 2023].
- viii MPEDA, 2022, State-wise Aquaculture Production. Available at https://mpeda.gov.in/?page\_id=651 [Accessed on 7 April 2023].
- <sup>ix</sup> The World Bank 2016, India States Briefs, World Bank. Available at: <a href="http://www.worldbank.org/en/news/feature/2016/05/26/india-states-briefs">http://www.worldbank.org/en/news/feature/2016/05/26/india-states-briefs</a> [Accessed on 29 January 2023].
- \* Ashok, S & Thomas, N 2014, 'A Study on issues of inter-state migrant labourers in India', International Journal of Scientific & Engineering Research, vol. 5, no.7, p. 92. Available at: https://www.ijser.org/researchpaper/A-study-on-issues-of-inter-state-migrant-labourers-in-India.pdf [Accessed on 19 May 2024].
- xi The Freedom Fund 2016, Northern India Hotspot 2016 Annual Report, The Freedom Fund, p. 12. Available at: N-India-2016-Annual-Report.pdf (d1r4g0yjvcc7lx.cloudfront.net) [Accessed on 19 May 2024].
- xii India Committee of the Netherlands (ICN) 2016, Fabric of Slavery, ICN, p.2. Available at: <a href="http://www.indianet.nl/pdf/FabricOfSlavery.pdf">http://www.indianet.nl/pdf/FabricOfSlavery.pdf</a> [Accessed on 13 May 2024].
- <sup>xiii</sup> Deepak K. Mishra, Migrant Labour During the Pandemic: A Political Economy Perspective, The Indian Economic Journal, 69(3) 410-421 (2021) at 413. Available at <a href="https://journals.sagepub.com/doi/pdf/10.1177/00194662211021209">https://journals.sagepub.com/doi/pdf/10.1177/00194662211021209</a> [Accessed on 19 May 2024].
- xiv Deepak K. Mishra, Migrant Labour During the Pandemic: A Political Economy Perspective, The Indian Economic Journal, 69(3) 410-421 (2021) at 413. Available at https://journals.sagepub.com/doi/pdf/10.1177/00194662211021209 [Accessed on 19 May 2024].
- \*\* Kalyani, M 2016, 'Indian Informal Sector: An Analysis', International Journal of Managerial Studies and Research, vol. 4, no. 1, p. 82. Available at: https://www.arcjournals.org/pdfs/ijmsr/v4-i1/9.pdf [Accessed on 19 May 2024].
- xvi Anti-Slavery International 2017, 'Slavery in India's Brick Kilns and the Payment Systems', Anti-Slavery International, p.5. Available at: http://www.antislavery.org/wp-content/uploads/2017/09/Slavery-In-Indias-Brick-Kilns-The-Payment-System.pdf [Accessed on 19 May 2024].
- xvii Special Rapporteur on contemporary forms of slavery, including its causes and consequences (Tomoya Obokata), Nexus Between Displacement and Contemporary Forms of Slavery, Report to Human Rights Council, Forty-eighth Session, United Nations, A/HRC/48/52 (July 26, 2021) at 9, cited in: Southern Shrimp Alliance, 14 January 2022, Comments on ILAB Reports 2022. Available at



<sup>&</sup>quot;Certification and Ratings Collaboration, 2023, Sustainable Seafood Data Tool. Available at <a href="https://certificationandratings.org/data-tool-2022/">https://certificationandratings.org/data-tool-2022/</a> [Accessed on 18 April 2023].

iii MPEDA, Marine Products Exports. Available at https://mpeda.gov.in/?page\_id=438 [Accessed on 7 January 2023].

iv UN Comtrade Database. Available at

https://www.dol.gov/sites/dolgov/files/ILAB/submissions/SSA-Comments-to-ILAB-on-List-of-Goods-Report-Jan-14-2022-India.pdf [Accessed on 26 January 2024].

- Deepak K. Mishra, Migrant Labour During the Pandemic: A Political Economy Perspective, The Indian Economic Journal, 69(3) 410-421 (2021) at 413. Available at <a href="https://journals.sagepub.com/doi/pdf/10.1177/00194662211021209">https://journals.sagepub.com/doi/pdf/10.1177/00194662211021209</a> [Accessed on 19 May 2024].
- xix Kulkarni, R 2015, 'Seasonal Migration- A developmental challenge?', Indian Journal of Occupational & Environmental Medicine', vol. 19, no. 1, p.1. Available at: <a href="https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4446931/">https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4446931/</a> [Accessed on 19 May 2024].
- \*\* Human Rights Watch 2014, 'They Say We're Dirty' Denying an Education to India's marginalized, Human Rights Watch, p. 58, Available at: <a href="http://www.right-to-education.org/sites/right-to-education.org/files/resource-">http://www.right-to-education.org/sites/right-to-education.org/files/resource-</a>

attachments/HRW\_Denying\_Education\_to\_India\_Marginalised\_2014.pdf [Accessed on 19 May 2024]

- <sup>xxi</sup> US Department of Labor, 2023, 2022 Findings on the Worst Forms of Child Labor: India. Available at https://www.dol.gov/agencies/ilab/resources/reports/child-labor/india [Accessed on 29 January 2024].
- us Department of Labour, 2021, Findings on the Worst Forms of Child Labor India. Available at <a href="https://www.dol.gov/sites/dolgov/files/ILAB/child-labor\_reports/tda2021/India.pdf">https://www.dol.gov/sites/dolgov/files/ILAB/child-labor\_reports/tda2021/India.pdf</a> [Accessed on 26 January 2024].
- $^{ imes imes imes}$  US Department of Labour, 2022, Findings on the Worst Forms of Child Labor India. Available at:

 $\underline{https://www.dol.gov/sites/dolgov/files/ILAB/child\_labor\_reports/tda2022/India.pdf} \ [Accessed on 26 \ January 2024].$ 

- xxiiv Feminism in India (FII), 2022, Sumangali Scheme: Marginalised Young Girls Made To Earn Dowry Through A Caste-Class Patriarchal Nexus.

  Available at https://feminisminindia.com/2022/06/08/sumangali-scheme-marginalised-young-girls-made-to-earn-dowry-through-a-caste-class-patriarchal-nexus/ [Accessed on 29 January 2022].
- xxx Laudes Foundation, 2020, Fighting the Sumangali scheme. Available at https://www.laudesfoundation.org/learning/lesson-notes/sumangali-scheme-textile-industry-india [Accessed on 29 January 2022].
- india Committee of the Netherlands, 2017, Fabric of Slavery Large-scale forced (child) labour in South India's spinning mills. Available at <a href="http://www.indianet.nl/pdf/FabricOfSlavery.pdf">http://www.indianet.nl/pdf/FabricOfSlavery.pdf</a> [Accessed on 19 May 2024].
- Feminism in India (FII), 2022, Sumangali Scheme: Marginalised Young Girls Made To Earn Dowry Through A Caste-Class Patriarchal Nexus.

  Available at <a href="https://feminisminindia.com/2022/06/08/sumangali-scheme-marginalised-young-girls-made-to-earn-dowry-through-a-caste-class-patriarchal-nexus/">https://feminisminindia.com/2022/06/08/sumangali-scheme-marginalised-young-girls-made-to-earn-dowry-through-a-caste-class-patriarchal-nexus/</a> [Accessed on 29 January 2022].
- xxviii Sengupta, S., & Guchhait, S. K. (2021). Inequality in Contemporary India: Does Caste Still Matter? Journal of Developing Societies, 37(1), 57–82. https://doi.org/10.1177/0169796X21998387 [Accessed on 19 May 2024].
- xxiix Pew Research, 2021, RELIGION IN INDIA: TOLERANCE AND SEGREGATION 4. Attitudes about caste. Available at

https://www.pewresearch.org/religion/2021/06/29/attitudes-about-caste/ [Accessed on 14 August 2021].

xxx CNN, 2020, Under India's caste system, Dalits are considered untouchable. The coronavirus is intensifying that slur. Available at:

https://edition.cnn.com/2020/04/15/asia/india-coronavirus-lower-castes-hnk-intl/index.html [Accessed on 14 August 2023].

- \*\*\*\*i Human Rights Watch, 2022, India: Surge in Summary Punishments of Muslims. Available at <a href="https://www.hrw.org/news/2022/10/07/india-surge-summary-punishments-muslims">https://www.hrw.org/news/2022/10/07/india-surge-summary-punishments-muslims</a> [Accessed on 15 December 2023].
- xxxii Global Slavery Index, GLOBAL SLAVERY INDEX / 2018 / COUNTRY STUDIES, INDIA. Available at

https://www.globalslaveryindex.org/2018/findings/country-studies/india/#footnote:60 [Accessed on 29 January 2023].

- $_{ ext{xoxiii}}$  Southern Shrimp Alliance, 14 January 2022, Comments on ILAB Reports 2022. Available at
- https://www.dol.gov/sites/dolgov/files/ILAB/submissions/SSA-Comments-to-ILAB-on-List-of-Goods-Report-Jan-14-2022-India.pdf [Accessed on 26 January 2024].



- xxxiv US Department of State, 2024, 2024 Trafficking in Persons Report. Available at <a href="https://www.state.gov/reports/2024-trafficking-in-persons-report/india/">https://www.state.gov/reports/2024-trafficking-in-persons-report/india/</a> [Accessed on 25 June 2024].
- vxxv US Department of State, 2024, 2024 Trafficking in Persons Report. Available at <a href="https://www.state.gov/reports/2024-trafficking-in-persons-report/india/">https://www.state.gov/reports/2024-trafficking-in-persons-report/india/</a> Accessed on 25 June 2024].
- xxxvi US Department of Labor, 2022, Bureau of International Labor Affair (ILAB) > Resources > International Child Labor & Forced Labor Reports > Findings on the Worst Forms of Child Labor India. Available at:

https://www.dol.gov/sites/dolgov/files/ILAB/child\_labor\_reports/tda2022/India.pdf [Accessed on 10 December 2023].

https://www.dol.gov/sites/dolgov/files/ILAB/child\_labor\_reports/tda2022/India.pdf [Accessed on 10 December 2023].

wxxiii US Department of Labor, 2022, Bureau of International Labor Affair (ILAB) > Resources > International Child Labor & Forced Labor Reports > Findings on the Worst Forms of Child Labor - India. Available at:

https://www.dol.gov/sites/dolgov/files/ILAB/child\_labor\_reports/tda2022/India.pdf [Accessed on 10 December 2023].

xxxiix US Department of Labor, 2022, Bureau of International Labor Affair (ILAB) > Resources > International Child Labor & Forced Labor Reports > Findings on the Worst Forms of Child Labor - India. Available at:

https://www.dol.gov/sites/dolgov/files/ILAB/child\_labor\_reports/tda2022/India.pdf [Accessed on 10 December 2023].

- xl US Department of State, 2024, 2024 Trafficking in Persons Report. Available at https://www.state.gov/reports/2024-trafficking-in-persons-report/india/ [Accessed on 25 June 2024].
- xli Frontline, 2020, The new labour codes: Labour's loss. Available at https://frontline.thehindu.com/the-nation/labours-loss/article32749705.ece [Accessed on 9 July 2023].
- <sup>xiii</sup> Bhuta A. Imbalancing Act: India's Industrial Relations Code, 2020. Indian J Labour Econ. 2022;65(3):821-830. doi: 10.1007/s41027-022-00389-3. Epub 2022 Aug 25. PMID: 36042793; PMCID: PMC9409614. Available at <a href="https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9409614/">https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9409614/</a> [Accessed on 19 May 2024].
- xiiii ITUC, 2022, Global Rights Index India 2022. Available at ITUC GRI India (global rights index.org) [Accessed on 22 January 2023].
- xiiv The Hindu, 2016, Child labour rampant in seafood units: police. Available at <a href="https://www.thehindu.com/news/cities/Kochi/Child-labour-rampant-in-seafood-units-police/article14616051.ece">https://www.thehindu.com/news/cities/Kochi/Child-labour-rampant-in-seafood-units-police/article14616051.ece</a> [Accessed on 31 March 2023].
- xiv Krishna et al. 2018, Child Labour in The Fishery Sector in Visakhapatnam: A Pilot Study, International Journal for Research in Engineering Application & Management (IJREAM). Available at <a href="http://ijream.org/papers/IJREAMV04I0439164.pdf">http://ijream.org/papers/IJREAMV04I0439164.pdf</a> [Accessed on 19 May 2024].
- west-bengal-india-scoping-report.html#Acknowledgements [Accessed on 19 May 2024].
- xivii Mongabay, 2016, Hard labor in India's fisheries: an interview with researcher Divya Karnad. Available at

https://news.mongabay.com/2016/05/migrant-labor-works-appalling-conditions-indias-fisheries-industry-interview-fisheries-researcher-divya-karnad/ [Accessed on 31 March 2023].

- Krishna et al. 2018, Child Labour in The Fishery Sector in Visakhapatnam: A Pilot Study, International Journal for Research in Engineering Application & Management (IJREAM). Available at <a href="http://ijream.org/papers/IJREAMV04I0439164.pdf">http://ijream.org/papers/IJREAMV04I0439164.pdf</a> [Accessed on 19 May 2024].
- xiix Environmental Justice Foundation (EJF), 2003. Smash & Grab: Conflict, Corruption and Human Rights Abuses in the Shrimp Farming Industry. Environmental Justice Foundation, London, UK. Available at <a href="https://ejfoundation.org/resources/downloads/smash\_and\_grab.pdf">https://ejfoundation.org/resources/downloads/smash\_and\_grab.pdf</a> [Accessed on 19 May 2024].



- <sup>1</sup> Environmental Justice Foundation (EJF), 2003. Smash & Grab: Conflict, Corruption and Human Rights Abuses in the Shrimp Farming Industry. Environmental Justice Foundation, London, UK. Available at <a href="https://ejfoundation.org/resources/downloads/smash\_and\_grab.pdf">https://ejfoundation.org/resources/downloads/smash\_and\_grab.pdf</a> [Accessed on 19 May 2024].
- Environmental Justice Foundation (EJF), 2003. Smash & Grab: Conflict, Corruption and Human Rights Abuses in the Shrimp Farming Industry. Environmental Justice Foundation, London, UK. Available at <a href="https://ejfoundation.org/resources/downloads/smash\_and\_grab.pdf">https://ejfoundation.org/resources/downloads/smash\_and\_grab.pdf</a> [Accessed on 19 May 2024].
- The Fish Site, 2021, How a shrimp farming "mafia" is displacing Indian fishing communities. Available at <a href="https://thefishsite.com/articles/how-a-shrimp-farming-mafia-is-displacing-indian-fishing-communities">https://thefishsite.com/articles/how-a-shrimp-farming-mafia-is-displacing-indian-fishing-communities</a> [Accessed on 7 April 2023].
- Hidden Harvest: Human Rights and Environmental Abuses in India's Shrimp Industry, Corporate Accountability Lab (March 2024), Available at: <a href="https://corpaccountabilitylab.org/hidden-harvest">https://corpaccountabilitylab.org/hidden-harvest</a> [Accessed on 19 May 2024].
- <sup>liv</sup> Associated Press, 20 March 2024, AP finds grueling conditions in Indian shrimp industry that report calls 'dangerous and abusive'. Available at <a href="https://apnews.com/article/india-shrimp-seafood-industry-labor-abuses-us-imports-e5b51878eafbb6e28977710b191eb7de">https://apnews.com/article/india-shrimp-seafood-industry-labor-abuses-us-imports-e5b51878eafbb6e28977710b191eb7de</a> [Accessed on 1 April 2024].
- The Ocean Outlaw, Indian Shrimp: A Growing Goliath The true price of a cheap appetizer. Available at <a href="https://www.theoutlawocean.com/investigations/india-shrimp-a-growing-goliath/">https://www.theoutlawocean.com/investigations/india-shrimp-a-growing-goliath/</a> [Accessed on 7 April 2024].
- https://www.theoutlawocean.com/investigations/india-shrimp-a-growing-goliath/indian-shrimp-rife-with-bondage-hazards-and-stolen-wages/ [Accessed on 7 April 2024].
- <sup>vii</sup> Elevate, 2023, Human Rights Impact Assessment Farmed Shrimp in India. Available at <a href="https://www.thekrogerco.com/wp-content/uploads/2023/06/EVT\_Kroger\_Lidl\_HRIA-Shrimp-India\_May-2023-Final-Report.pdf">https://www.thekrogerco.com/wp-content/uploads/2023/06/EVT\_Kroger\_Lidl\_HRIA-Shrimp-India\_May-2023-Final-Report.pdf</a> [Accessed on 19 May 2024].
- Will The Hindu, 25 September 2023, 'Poverty-stricken minors from other States found labouring in aqua processing units in Andhra Pradesh'.

  Available at: Poverty-stricken minors from other States found labouring in aqua processing units in Andhra Pradesh The Hindu [Accessed on 5 May 2024].
- The Hindu, 25 September 2023, 'Over 20 'minor' girl workers found in aqua company in Krishna district'. Available at: https://www.thehindu.com/news/national/andhra-pradesh/over-20-minor-girl-workers-found-in-aqua-company-in-krishna-district/article67341930.ece. [Accessed on 5 May 2024].
- \* Global March Against Child Labor, 2017, CATCH OF THE DAY, A Situational Analysis of Trafficking and Forced Labour in the Global Supply Chains of the Garment and Seafood Sector in Bangladesh, India and Philippines. Available at https://www.humandignity.foundation/wp-content/uploads/2018/11/Catch-of-the-Day.pdf
- ki Press Information Bureau, 2019. Government of India Ministry of Agriculture & Farmers Welfare. Available at https://pib.gov.in/newsite/PrintRelease.aspx?relid=187305#:~:text=The%20fisheries%20and%20aquaculture%20production,5%25%20to%20the%20agricultural%20GDP [Accessed on 13 August 2023].
- lkii ILO, Technical meeting on the future of work in aquaculture in the context of the rural economy, Sectoral Policies Department, 2021. Available at <a href="https://www.ilo.org/wcmsp5/groups/public/---ed\_dialogue/---sector/documents/meetingdocument/wcms\_841121.pdf">https://www.ilo.org/wcmsp5/groups/public/---ed\_dialogue/---sector/documents/meetingdocument/wcms\_841121.pdf</a> [Accessed on 19 May 2024].
- Ministerie van Landbouw, Natuur en Voedselkwaliteit, 2020, Covid-19 and India's aquaculture sector: after rain comes sunshine? Available at <a href="https://www.agroberichtenbuitenland.nl/actueel/nieuws/2020/09/02/covid-19-and-india%E2%80%99s-aquaculture-sector-after-rain-comes-sunshine">https://www.agroberichtenbuitenland.nl/actueel/nieuws/2020/09/02/covid-19-and-india%E2%80%99s-aquaculture-sector-after-rain-comes-sunshine</a> [Accessed on 7 April 2023].



hiv The Marine Products Export Development Authority, Annual Report 2021-2022. Available at https://mpeda.gov.in/wpcontent/uploads/2023/01/Annual%20Report%20PDF-21-22.pdf [Accessed on 10 December 2023].

lnternational Trade Union Confederation (ITUC), 2016, Precarious Work in the Asian Seafood Global Value Chain. Available at <a href="https://www.ituc-csi.org/IMG/pdf/precarious">https://www.ituc-csi.org/IMG/pdf/precarious</a> work in the asian seafood global value chain.pdf [Accessed on 19 May 2024].

by Department of Fisheries, Ministry of Fisheries, Animal Husbandry and Dairying, Government of India, Annual Report 2021-22. Available at <a href="https://dof.gov.in/sites/default/files/2022-04/Annual Report 2021 22 English.pdf">https://dof.gov.in/sites/default/files/2022-04/Annual Report 2021 22 English.pdf</a>

The Marine Products Export Development Authority, Annual Report 2021-2022. Available at <a href="https://mpeda.gov.in/wp-content/uploads/2023/01/Annual%20Report%20PDF-21-22.pdf">https://mpeda.gov.in/wp-content/uploads/2023/01/Annual%20Report%20PDF-21-22.pdf</a> [Accessed on 10 December 2023].

The Marine Products Export Development Authority, Annual Report 2021-2022. Available at <a href="https://mpeda.gov.in/wpcontent/uploads/2023/01/Annual%20Report%20PDF-21-22.pdf">https://mpeda.gov.in/wpcontent/uploads/2023/01/Annual%20Report%20PDF-21-22.pdf</a> [Accessed on 10 December 2023].

lxix Aqua Culture Asia Pacific, Review of India's 2021 shrimp crop. Available at

 $\label{lem:https://issuu.com/aquacultureasiapacific/docs/aq22179\_aap\_sepoct\_22\_fa\_lr/s/16897245\#:\sim:text=Hatchery\%20segment,280\%2C000\%20were \cite{Matter:M$ 

\*\*The Marine Products Export Development Authority, Annual Report 2021-2022. Available at <a href="https://mpeda.gov.in/wp-content/uploads/2023/01/Annual%20Report%20PDF-21-22.pdf">https://mpeda.gov.in/wp-content/uploads/2023/01/Annual%20Report%20PDF-21-22.pdf</a> [Accessed on 10 December 2023].

boxi Boston Consulting Group, 2020, A Strategic Approach to Sustainable Shrimp Production in India THE CASE FOR IMPROVED ECONOMICS AND SUSTAINABILITY. Available at https://media-publications.bcg.com/BCG-A-Strategic-Approach-to-Sustainable-Shrimp-Production-in-India-Jan-2020.pdf [Accessed on 7 April 2023].

bxii The Marine Products Export Development Authority, Annual Report 2021-2022. Available at https://mpeda.gov.in/wp-content/uploads/2023/01/Annual%20Report%20PDF-21-22.pdf [Accessed on 10 December 2023].

The Marine Products Export Development Authority, Annual Report 2021-2022. Available at <a href="https://mpeda.gov.in/wp-content/uploads/2023/01/Annual%20Report%20PDF-21-22.pdf">https://mpeda.gov.in/wp-content/uploads/2023/01/Annual%20Report%20PDF-21-22.pdf</a> [Accessed on 10 December 2023].

The Marine Products Export Development Authority, Annual Report 2021-2022. Available at <a href="https://mpeda.gov.in/wp-content/uploads/2023/01/Annual%20Report%20PDF-21-22.pdf">https://mpeda.gov.in/wp-content/uploads/2023/01/Annual%20Report%20PDF-21-22.pdf</a> [Accessed on 10 December 2023].

CULTURE. Available at https://www.caa.gov.in/pdf/accordingapproval\_spf\_lvannamai.pdf [Accessed on 13 August 2023].

lxxx Coastal Aquaculture Authority, II. GUIDELINES FOR ACCORDING APPROVAL TO THE FARMS FOR SPF LITOPENAEUS VANNAMEI

boxvi Boston Consulting Group, 2020, A Strategic Approach to Sustainable Shrimp Production in India THE CASE FOR IMPROVED ECONOMICS AND SUSTAINABILITY. Available at <a href="https://media-publications.bcg.com/BCG-A-Strategic-Approach-to-Sustainable-Shrimp-Production-in-India-Jan-2020.pdf">https://media-publications.bcg.com/BCG-A-Strategic-Approach-to-Sustainable-Shrimp-Production-in-India-Jan-2020.pdf</a> [Accessed on 7 April 2023].

https://thefishsite.com/articles/scaling-up-the-adoption-of-technology-in-indian-aquaculture-aquaconnect [Accessed on 7 April 2023].
https://thefishsite.com/articles/scaling-up-the-adoption-of-technology-in-indian-aquaculture-aquaconnect [Accessed on 7 April 2023].
https://thefishsite.com/articles/scaling-up-the-adoption-of-technology-in-indian-aquaculture-aquaconnect [Accessed on 7 April 2023].

AND SUSTAINABILITY. Available at <a href="https://media-publications.bcg.com/BCG-A-Strategic-Approach-to-Sustainable-Shrimp-Production-in-India-Jan-2020.pdf">https://media-publications.bcg.com/BCG-A-Strategic-Approach-to-Sustainable-Shrimp-Production-in-India-Jan-2020.pdf</a> [Accessed on 7 April 2023]

kwix Shrimp Insights, 2024, Guide to the Indian Shrimp Industry, SHRIMP INSIGHTS Report Series. Available at https://www.shrimpinsights.com/report-series/guide-indian-shrimp-industry. [Accessed on 31 May 2024].



Boston Consulting Group, 2020, A Strategic Approach to Sustainable Shrimp Production in India THE CASE FOR IMPROVED ECONOMICS AND SUSTAINABILITY. Available at <a href="https://media-publications.bcg.com/BCG-A-Strategic-Approach-to-Sustainable-Shrimp-Production-in-India-Jan-2020.pdf">https://media-publications.bcg.com/BCG-A-Strategic-Approach-to-Sustainable-Shrimp-Production-in-India-Jan-2020.pdf</a> [Accessed on 7 April 2023]

boxi ILO, 2023, Value chain analysis of the food processing sector in Andhra Pradesh and Odisha. Available at:

https://www.ilo.org/wcmsp5/groups/public/---asia/---ro-bangkok/---sro-new\_delhi/documents/publication/wcms\_877320.pdf [Accessed on 19 May 2024].

 ${}^{\text{locoxii}}\,\text{Shrimp Insights, 2024, Guide to the Indian Shrimp Industry, SHRIMP INSIGHTS Report Series.}\,\text{Available at a substitution of the Indian Shrimp Industry, SHRIMP INSIGHTS Report Series.}\,$ 

https://www.shrimpinsights.com/report-series/guide-indian-shrimp-industry [Accessed on 31 May 2024].

Department of Fisheries, Ministry of Fisheries, Animal Husbandry and Dairying, Government of India, Annual Report 2022-23. Available at <a href="https://dof.gov.in/sites/default/files/2023-04/Final\_Annual\_Report\_2022-23\_English.pdf">https://dof.gov.in/sites/default/files/2023-04/Final\_Annual\_Report\_2022-23\_English.pdf</a> [Accessed on 19 May 2024].

 ${}^{\text{looxiv}} \, \text{Shrimp Insights, 2024, Guide to the Indian Shrimp Industry, SHRIMP INSIGHTS Report Series.} \, \text{Available at the Indian Shrimp Industry, SHRIMP INSIGHTS Report Series.} \, \text{Shrimp Insights, 2024, Guide to the Indian Shrimp Industry, SHRIMP INSIGHTS Report Series.} \, \text{Available at the Indian Shrimp Industry, Shrimp Insights, 2024, Guide to the Indian Shrimp Industry, Shrimp Insights, 2024, Guide to the Indian Shrimp Industry, Shrimp Insights, 2024, Guide to the Indian Shrimp Industry, Shrimp Insights, 2024, Guide to the Indian Shrimp Industry, Shrimp Insights, 2024, Guide to the Indian Shrimp Industry, Shrimp Insights, 2024, Guide to the Indian Shrimp Industry, Shrimp Insights, 2024, Guide to the Indian Shrimp Industry, Shrimp Insights, 2024, Guide to the Indian Shrimp Industry, Shrimp Insights, 2024, Guide to the Indian Shrimp Industry, Shrimp Insights, 2024, Guide to the Indian Shrimp Industry, Shrimp Insights, 2024, Guide to the Indian Shrimp Industry, Shrimp Insights, 2024, Guide to the Indian Shrimp Industry, Shrimp Insights, 2024, Guide to the Indian Shrimp Industry, Shrimp Insights, 2024, Guide to the Indian Shrimp Industry, Shrimp Insights, 2024, Guide to the Indian Shrimp Industry, Shrimp Insights, 2024, Guide to the Indian Shrimp Insights, 2024, Guide to the Insight Insigh$ 

https://www.shrimpinsights.com/report-series/guide-indian-shrimp-industry [Accessed on 31 May 2024].

 ${}^{\text{locot}} Shrimp\ Insights, 2024, Guide\ to\ the\ Indian\ Shrimp\ Industry, SHRIMP\ INSIGHTS\ Report\ Series.\ Available\ at$ 

https://www.shrimpinsights.com/report-series/guide-indian-shrimp-industry [Accessed on 31 May 2024].

kwwi MPEDA, ENROLMENT OF FARMS, Available at https://mpeda.gov.in/?page\_id=989 [Accessed on 9 July 2023].

lxxxvii Aqua Culture Asia Pacific, Review of India's 2021 shrimp crop. Available at

 $https://issuu.com/aquacultureasiapacific/docs/aq22179\_aap\_sepoct\_22\_fa\_lr/s/16897245\#: \sim: text = Hatchery \%20 segment, 280\%2C000\%20 were \%20 imported \%20 in \%202021. [Accessed on 7 April 2023].$ 

Lossviii Coastal Aquaculture Authority, Ministry of Fisheries, Animal Husbandry and Dairying, Government of India. Available at <a href="https://caa.gov.in/hatcheries\_approved.html">https://caa.gov.in/hatcheries\_approved.html</a> [Accessed on 7 April 2023].

boxix Review of India's 2021 Shrimp Crop, Aqua Culture Asia Pacific (Sept./Oct. 2022), Available at:

 $\underline{https://issuu.com/aquacultureasiapacific/docs/aq22179\_aap\_sepoct\_22\_fa\_lr/s/16897245\#: \sim : text=President \% 20 (Events). -- text$ 

"Highest%20production%20in%202021,to%20the%20increase%20in%20production. [Accessed on 7 April 2024].

xc Department of Fisheries, Ministry of Fisheries, Animal Husbandry and Dairying, Government of India, Annual Report 2022-23. Available at https://dof.gov.in/sites/default/files/2023-04/Final\_Annual\_Report\_2022-23\_English.pdf

xci Aqua Culture Asia Pacific, Review of India's 2021 shrimp crop. Available at

 $\label{lem:https://issuu.com/aquacultureasiapacific/docs/aq22179\_aap\_sepoct\_22\_fa\_lr/s/16897245\#: $\sim: text=Hatchery\%20 segment, 280\%2C000\%20 were $\%20 in $\%20 in \%202021. [Accessed on 7 April 2023].$ 

xcii Boston Consulting Group, 2020, A Strategic Approach to Sustainable Shrimp Production in India THE CASE FOR IMPROVED ECONOMICS AND SUSTAINABILITY. Available at <a href="https://media-publications.bcg.com/BCG-A-Strategic-Approach-to-Sustainable-Shrimp-Production-in-India-Jan-2020.pdf">https://media-publications.bcg.com/BCG-A-Strategic-Approach-to-Sustainable-Shrimp-Production-in-India-Jan-2020.pdf</a> [Accessed on 7 April 2023].

xciii Hidden Harvest: Human Rights and Environmental Abuses in India's Shrimp Industry, Corporate Accountability Lab (March 2024), Available at: <a href="https://corpaccountabilitylab.org/hidden-harvest">https://corpaccountabilitylab.org/hidden-harvest</a> [Accessed on 19 May 2024].

xciv Boston Consulting Group, 2020, A Strategic Approach to Sustainable Shrimp Production in India THE CASE FOR IMPROVED ECONOMICS AND SUSTAINABILITY. Available at <a href="https://media-publications.bcg.com/BCG-A-Strategic-Approach-to-Sustainable-Shrimp-Production-in-India-Jan-2020.pdf">https://media-publications.bcg.com/BCG-A-Strategic-Approach-to-Sustainable-Shrimp-Production-in-India-Jan-2020.pdf</a> [Accessed on 7 April 2023].



xcv Aqua Culture Asia Pacific, Review of India's 2021 shrimp crop. Available at

 $\label{lem:https://issuu.com/aquacultureasiapacific/docs/aq22179\_aap\_sepoct\_22\_fa\_lr/s/16897245\#:\sim: text=Hatchery\%20segment, 280\%2C000\%20were \cite{Matchery}. The sepoct\_22\_fa\_lr/s/16897245\#:\sim: text=Hatchery\%20segment, 280\%2C000\%20were \cite{Matchery}. The sepoch\_22\%20segment, 280\%2C000\%20were \cite{Matchery}. The sepoch\_22\%20segment, 280\%2C000\%20were \cite{Matchery}. The sepoch\_22\%20segment, 280\%2C000\%20were \cite{Matchery}. The sepoch\_22\%20$ 

- xcvi Global Seafood Alliance, 2020, How India became the world's top shrimp producer. Available at https://www.globalseafood.org/advocate/how-india-became-the-worlds-top-shrimp-producer/ [Accessed on 7 April 2023].
- $^{ ext{xevii}}$  Shrimp Insights, 2024, Guide to the Indian Shrimp Industry, SHRIMP INSIGHTS Report Series. Available at

https://www.shrimpinsights.com/report-series/guide-indian-shrimp-industry [Accessed on 31 May 2024].

- xeviii Boston Consulting Group, 2020, A Strategic Approach to Sustainable Shrimp Production in India THE CASE FOR IMPROVED ECONOMICS AND SUSTAINABILITY. Available at https://media-publications.bcg.com/BCG-A-Strategic-Approach-to-Sustainable-Shrimp-Production-in-India-Jan-2020.pdf [Accessed on 7 April 2023].
- xcix Boston Consulting Group, 2020, A Strategic Approach to Sustainable Shrimp Production in India THE CASE FOR IMPROVED ECONOMICS AND SUSTAINABILITY. Available at https://media-publications.bcg.com/BCG-A-Strategic-Approach-to-Sustainable-Shrimp-Production-in-India-Jan-2020.pdf [Accessed on 7 April 2023].
- <sup>c</sup> Boston Consulting Group, 2020, A Strategic Approach to Sustainable Shrimp Production in India THE CASE FOR IMPROVED ECONOMICS AND SUSTAINABILITY. Available at <a href="https://media-publications.bcg.com/BCG-A-Strategic-Approach-to-Sustainable-Shrimp-Production-in-India-Jan-2020.pdf">https://media-publications.bcg.com/BCG-A-Strategic-Approach-to-Sustainable-Shrimp-Production-in-India-Jan-2020.pdf</a> [Accessed on 7 April 2023].
- ci International Trade Union Confederation (ITUC), 2016, Precarious Work in the Asian Seafood Global Value Chain. Available at <a href="https://www.ituc-csi.org/IMG/pdf/precarious">https://www.ituc-csi.org/IMG/pdf/precarious</a> work in the asian seafood global value chain.pdf [Accessed on 19 May 2024].
- cii Boston Consulting Group, 2020, A Strategic Approach to Sustainable Shrimp Production in India THE CASE FOR IMPROVED ECONOMICS AND SUSTAINABILITY. Available at <a href="https://media-publications.bcg.com/BCG-A-Strategic-Approach-to-Sustainable-Shrimp-Production-in-India-Jan-2020.pdf">https://media-publications.bcg.com/BCG-A-Strategic-Approach-to-Sustainable-Shrimp-Production-in-India-Jan-2020.pdf</a> [Accessed on 7 April 2023].
- ciii WILLIAMS, Meryl J.; SYDDALL, Victoria. Women, fisheries technology and development: toward new research approaches. *Gender, Technology and Development*, 2022, 1-28. Available at <a href="https://www.tandfonline.com/doi/abs/10.1080/09718524.2022.2125456">https://www.tandfonline.com/doi/abs/10.1080/09718524.2022.2125456</a> [Accessed on 19 May 2024].
- civ The Marine Products Export Development Authority (Ministry of Commerce & Industry, Govt. of India), Region-wise Pre Processing Plants With Capacity. Available at https://e-mpeda.nic.in/registration/Rpt\_Region\_wise\_Peelingshed\_With\_Capacity.aspx [Accessed on 10 December 2023].
- cv International Trade Union Confederation (ITUC), 2016, Precarious Work in the Asian Seafood Global Value Chain. Available at <a href="https://www.ituc-csi.org/IMG/pdf/precarious\_work\_in\_the\_asian\_seafood\_global\_value\_chain.pdf">https://www.ituc-csi.org/IMG/pdf/precarious\_work\_in\_the\_asian\_seafood\_global\_value\_chain.pdf</a> [Accessed on 19 May 2024].
- cvi Shrimp Insights, 2024, Guide to the Indian Shrimp Industry, SHRIMP INSIGHTS Report Series. Available at https://www.shrimpinsights.com/report-series/guide-indian-shrimp-industry [Accessed on 31 May 2024].
- cvii Hidden Harvest: Human Rights and Environmental Abuses in India's Shrimp Industry, Corporate Accountability Lab (March 2024), Available at: https://corpaccountabilitylab.org/hidden-harvest [Accessed on 19 May 2024].
- cviii Associated Press, 20 March 2024, AP finds grueling conditions in Indian shrimp industry that report calls 'dangerous and abusive'. Available at <a href="https://apnews.com/article/india-shrimp-seafood-industry-labor-abuses-us-imports-e5b51878eafbb6e28977710b191eb7de">https://apnews.com/article/india-shrimp-seafood-industry-labor-abuses-us-imports-e5b51878eafbb6e28977710b191eb7de</a> [Accessed on 1 April 2024].
- cix The Ocean Outlaw, India Shrimp Rife with Bondage, Hazards, and Stolen Wages. Available at <a href="https://www.theoutlawocean.com/investigations/india-shrimp-a-growing-goliath/indian-shrimp-rife-with-bondage-hazards-and-stolen-wages/">https://www.theoutlawocean.com/investigations/india-shrimp-a-growing-goliath/indian-shrimp-rife-with-bondage-hazards-and-stolen-wages/</a> [Accessed on 7 April 2024].



- <sup>cx</sup> Hidden Harvest: Human Rights and Environmental Abuses in India's Shrimp Industry, Corporate Accountability Lab (March 2024), Available at: https://corpaccountabilitylab.org/hidden-harvest [Accessed on 19 May 2024].
- cxi Boston Consulting Group, 2020, A Strategic Approach to Sustainable Shrimp Production in India THE CASE FOR IMPROVED ECONOMICS AND SUSTAINABILITY. Available at <a href="https://media-publications.bcg.com/BCG-A-Strategic-Approach-to-Sustainable-Shrimp-Production-in-India-Jan-2020.pdf">https://media-publications.bcg.com/BCG-A-Strategic-Approach-to-Sustainable-Shrimp-Production-in-India-Jan-2020.pdf</a> [Accessed on 7 April 2023].
- cxii The Marine Products Export Development Authority (Ministry of Commerce & Industry, Govt. of India), Region-wise Processing Plants. Available at <a href="https://e-mpeda.nic.in/registration/Rpt\_Region\_wise\_Plants\_With\_Capacity.aspx">https://e-mpeda.nic.in/registration/Rpt\_Region\_wise\_Plants\_With\_Capacity.aspx</a> [Accessed on 10 December 2023].
- cxiii The Marine Products Export Development Authority (Ministry of Commerce & Industry, Govt. of India), Region-Wise Storage Premises.

Available at https://e-mpeda.nic.in/registration/Rpt Region Wise Storages With Capacity.aspx [Accessed on 10 December 2023].

cxiv European Commission Information Management System for Official Controls.

 $https://webgate.ec.europa.eu/tracesnt/directory/publication/establishment/index \#!/search?classificationSectionId=FISHERY\_PRODUCTS\&classificationSectionChapter=food\&countryCode=IN\&sort=country.translation Available at [Accessed on 10 December 2023].$ 

- Export Genius, 2017, Shrimp Exports from India Top 2017 Shrimp Exporters in India. Available at <a href="https://www.exportgenius.in/blog/shrimp-exports-from-india-top-2017-shrimp-exporters-in-india-132.php">https://www.exportgenius.in/blog/shrimp-exports-from-india-top-2017-shrimp-exporters-in-india-132.php</a> [Accessed on 7 April 2023].
- cxvi International Trade Union Confederation (ITUC), 2016, Precarious Work in the Asian Seafood Global Value Chain. Available at <a href="https://www.ituc-csi.org/IMG/pdf/precarious\_work\_in\_the\_asian\_seafood\_global\_value\_chain.pdf">https://www.ituc-csi.org/IMG/pdf/precarious\_work\_in\_the\_asian\_seafood\_global\_value\_chain.pdf</a> [Accessed on 19 May 2024].
- cxvii Boston Consulting Group, 2020, A Strategic Approach to Sustainable Shrimp Production in India THE CASE FOR IMPROVED ECONOMICS AND SUSTAINABILITY. Available at <a href="https://media-publications.bcg.com/BCG-A-Strategic-Approach-to-Sustainable-Shrimp-Production-in-India-Jan-2020.pdf">https://media-publications.bcg.com/BCG-A-Strategic-Approach-to-Sustainable-Shrimp-Production-in-India-Jan-2020.pdf</a> [Accessed on 7 April 2023].
- cxviii Global Seafood Alliance, 2020, How India became the world's top shrimp producer. Available at

https://www.globalseafood.org/advocate/how-india-became-the-worlds-top-shrimp-producer/ [Accessed on 7 April 2023].

- cxix The Marine Products Export Development Authority, 2023, Annual Report 2021-2022. Available at https://mpeda.gov.in/wpcontent/uploads/2023/01/Annual%20Report%20PDF-21-22.pdf [Accessed on 10 December 2023].
- cxx United Nations, 2023, UN Comtrade Database. Available at https://comtradeplus.un.org/ [Accessed on 7 April 2023].
- Existing Group, 2020, A Strategic Approach to Sustainable Shrimp Production in India THE CASE FOR IMPROVED ECONOMICS AND SUSTAINABILITY. Available at <a href="https://media-publications.bcg.com/BCG-A-Strategic-Approach-to-Sustainable-Shrimp-Production-in-India-Jan-2020.pdf">https://media-publications.bcg.com/BCG-A-Strategic-Approach-to-Sustainable-Shrimp-Production-in-India-Jan-2020.pdf</a> [Accessed on 7 April 2023].
- cxxii The Marine Products Export Development Authority, 2023, Annual Report 2021-2022. Available at <a href="https://mpeda.gov.in/wp-content/uploads/2023/01/Annual%20Report%20PDF-21-22.pdf">https://mpeda.gov.in/wp-content/uploads/2023/01/Annual%20Report%20PDF-21-22.pdf</a> [Accessed on 10 December 2023].
- cxxiii Shrimp Insights, 2024, Guide to the Indian Shrimp Industry, SHRIMP INSIGHTS Report Series. Available at <a href="https://www.shrimpinsights.com/report-series/guide-indian-shrimp-industry">https://www.shrimpinsights.com/report-series/guide-indian-shrimp-industry</a> [Accessed on 31 May 2024].

