Monterey Bay Aquarium®

Tropical Tuna Summary Report
Forced labor, human trafficking, and hazardous child labor risks

Fishing and Processing
Seafood Social Risk Tool V2

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GLOSSARY

TERM	DEFINITION
Adjusted risks	The risks of forced labor, human trafficking, and hazardous child labor in a country's seafood industry and the value chain of a specific seafood product as determined by characteristics specific to that industry and product value chain.
Base risks	The risks of forced labor, human trafficking, and hazardous child labor in a country as determined by the social, economic, and political environment.
Child labor	Work that is likely to harm the health, safety, and morals of children or interfere with their compulsory education.
Direct evidence	Evidence that confirms the presence of forced labor, human trafficking, and/or hazardous child labor. Used for the purposes of the Seafood Social Risk Tool methodology.
Flag of convenience	The practice of registering a vessel to a country (flag) other than the country of ownership. Open vessel registries that allow vessels to be registered without having a connection to the flag state may be associated with cheaper fees, lower taxes, and less stringent regulation.
Forced labor	Defined in International Labour Organization (ILO) Convention 29 as "all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily." Also sometimes known as compulsory labor or as a form of modern slavery.
Hazardous child labor	Work that places a person below 18 years of age at immediate physical, mental, or moral risk because of the nature of the work or circumstances under which the work is undertaken. Hazardous work is one of the worst forms of child labor.
Human trafficking	Also known as trafficking in persons. Defined in the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime (also known as the Palermo Protocol) as "the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs."
Migrant worker	A person who moves to another country or area in their own country to find employment, including also seasonal or temporary work.
Worst forms of child labor	Defined in ILO Convention 182 as child slavery or practices similar to slavery, child forced labor, using children in armed conflict, using children in illicit activities, commercial sexual exploitation of children, and hazardous work likely to harm the health, safety, and morals of children.

LIST OF ABBREVIATIONS

ABBREVIATION	DEFINITION
AIS	Automatic identification system
EEZ	Exclusive economic zone
EU	European Union
FOC	Flag of convenience
GSI	Global Slavery Index
HDI	Human Development Index
ILO	International Labour Organization
ISSF	International Seafood Sustainability Foundation
IUU	Illegal, unreported, and unregulated
SSRT	Seafood Social Risk Tool
WGIs	Worldwide Governance Indicators

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Executive summary

Analysis of the risks of forced labor, human trafficking, and hazardous child labor in global tropical tuna fishing and processing systems reveals significant information gaps concerning workers, insufficient regulatory capacity to enforce labor legislation, opaque supply chains, and limited evidence of organization of workers or access to grievance mechanisms. Recommendations to address risk across different tuna supply chains are "**Know the workers**," "**Support worker engagement**," and "**Establish traceability systems**."

Introduction

This analysis is based upon the findings of 20 tropical tuna country risk profiles developed using the [Seafood Social Risk Tool (SSRT)](#). The SSRT is a business-facing risk assessment tool that analyzes the underlying drivers of risks of forced labor, human trafficking, and hazardous child labor associated with a seafood product and producing country to help businesses focus their due diligence efforts to improve human rights and labor conditions.

The SSRT has now been applied to fishing and processing for tropical tuna (skipjack, yellowfin, and bigeye tunas) in 20 major producing and/or exporting countries around the world.[1] Each of the 20 countries were assessed against the SSRT country, seafood industry, fishing and/or processing indicators and country risk profiles were prepared containing an analysis of the **base risks** and the **adjusted risks** for the country, seafood industry, and tropical tuna fishing and/or processing industries. Based on these assessments, recommended **due diligence** topics and questions for businesses were identified for each country and included in the risk profiles. The 20 risk profiles have been compared by country and region to provide an overarching analysis of risks and key due diligence topics for major tropical tuna producing countries.

Findings

Comparison of the 20 risk profiles reveals a significant lack of publicly available information regarding workers and factors affecting human rights risks in tropical tuna fishing and processing industries across the 20 countries. While gaps in information were found for some of the country-level indicators, information gaps were more prevalent for the seafood industry-level indicators and more so for the tropical tuna fishing and processing indicators. In general, environmental information regarding tuna fishing activities at sea was readily available, but there are gaps in information relating to the workforce, recruitment, and contracts in tropical tuna fishing. Some information regarding the characteristics of the tropical tuna processing industry was found, but very limited information was found regarding the workforce, recruitment, and contracts in tropical tuna processing. This lack of transparency makes it harder for businesses to understand risks in their supply chains and contributes to the risks of human trafficking, forced labor, and hazardous child labor in seafood and tuna production globally.

Forced labor, human trafficking, and/or hazardous child labor was found to be present in a variety of sectors in all 20 countries assessed. Sectors frequently implicated in these abuses include agriculture, commercial sexual exploitation, construction, mining, manufacturing, and domestic services, among others. Factors that affect the base risks of forced labor, human trafficking, and hazardous child labor across the 20 countries assessed include the following: regional migration

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[1]   Colombia, Ecuador, France, Ghana, Indonesia, Italy, Maldives, Mauritius, Mexico, Panama, Portugal, Philippines, South Korea, Senegal, Spain, Sri Lanka, Taiwan, Thailand, Venezuela, and Vietnam.

patterns and migrant acceptance; access to freedom of association and collective bargaining; and enforcement of anti-trafficking, forced labor, and child labor laws. Increased base risks are attributed to higher rates of immigration or internal migration and poor acceptance of migrants; barriers to workers organizing; and poor enforcement of legislation for human trafficking, forced labor, and hazardous child labor, often because of capacity issues in the labor inspectorate and sometimes due to corruption and official complicity.

Forced labor, human trafficking, and/or hazardous child labor was directly connected to the seafood industries of 11 out of 20 SSRT countries (Ecuador, Ghana, Indonesia, the Maldives, the Philippines, Senegal, South Korea, Sri Lanka, Taiwan, Thailand, and Vietnam). Evidence of forced labor, human trafficking, and hazardous child labor has been widely documented in the seafood industry in East Asia and the Pacific, including in fishing, aquaculture, and seafood processing. In comparison, limited evidence was found of these abuses in the seafood industry in the Latin America and Caribbean region. However, an absence of evidence does not equate to no or low risk as it may be due to limited investigation or public documentation of abuses. Factors that increase the adjusted risks of human trafficking, forced labor, and hazardous child labor occurring in the seafood industry include limited capacity for implementation and enforcement of industry-specific governance and limited evidence of access to grievance mechanisms to seafood workers, while the presence of voluntary schemes and multistakeholder initiatives may contribute to lowering risks.

Evidence directly connecting human trafficking and forced labor in tuna fishing was only found for two out of 15 SSRT countries assessed against the SSRT fishing indicators (South Korea and Taiwanese tuna longline fisheries). However, indicators of forced labor, including debt bondage, deceptive recruitment practices, and abusive working conditions, were identified for tuna fishing in Indonesia and the Philippines. Although no evidence was found of forced labor, human trafficking, and hazardous child labor in tuna fishing in other countries, the lack of transparency regarding workers and working conditions indicates that the risk of these abuses occurring cannot be ruled out. Factors that increase the adjusted risks of human trafficking, forced labor, and hazardous child labor in the tropical tuna fishing industry include a high reliance on migrant labor with associated concerns about unethical recruitment practices, as well as extended periods at sea and transshipment, which increase the difficulty of monitoring and enforcing labor rights on tuna fishing vessels. Evidence of illegal, unreported, and unregulated fishing, which may co-occur with human rights and labor rights abuses, was found to be a common risk factor.

No direct evidence was found of human trafficking, forced labor, or hazardous child labor in tuna processing in any of the 20 SSRT countries assessed. However, indicators of forced labor and (hazardous) child labor, including recruitment fees, debt bondage, deception, and excessive working hours, were found for several countries. As noted above, there is a paucity of information regarding the tuna processing workforce and employment characteristics, which is itself a significant risk factor. Where data were found regarding the tuna processing workforce, evidence suggests that more vulnerable workers (women) comprise a significant proportion of the workforce and are mainly employed in more precarious positions as temporary or contract workers rather than permanent workers. Several tuna processing countries import tuna for processing and re-export, thereby increasing the complexity of the supply chain and introducing risks of human trafficking, forced labor, and hazardous child labor from the fishing countries.

Due diligence recommendations

The due diligence recommendations in the tropical tuna risk profiles most frequently include *worker demographics*, *worker engagement (grievance) mechanisms*, **and** *processing activities (traceability and oversight of raw material supply)*. These reflect the lack of publicly available data on the tropical tuna industry workforce, the generally limited information on grievance mechanisms and barriers to workers organizing in tropical tuna producing countries, and the complex, opaque nature of tropical tuna supply chains.

Based upon the due diligence recommendations, businesses should strive to implement the following actions as a priority:

- **Know the workers** – gather information in supply chains to identify vulnerable or precarious workers, recruitment pathways, and working conditions.
- **Support worker engagement** – identify or establish mechanisms for worker engagement, such as grievance mechanisms, and actively support worker organization, including advocacy where there are national barriers to organizing.
- **Establish traceability systems** – implement interoperable traceability systems for information sharing among supply chain actors to track the product and associated data through the supply chain, starting from the fishing vessel. Data can be used to improve supply chain visibility and inform a business' understanding of supply chain risks, but traceability is not sufficient to address human rights risks alone and should be carried out in conjunction with the recommendations above.

Together, these actions can help businesses to better understand, prevent, and mitigate risks to workers, provide pathways for remediation of worker grievances, and establish greater transparency and supply chain oversight.

1 Introduction

This summary report discusses the risks of forced labor, human trafficking, and hazardous child labor in global tropical tuna production systems as based upon the findings of 20 tropical tuna risk profiles developed using the Monterey Bay Aquarium's Seafood Social Risk Tool (SSRT). The SSRT is a business-facing risk assessment tool that analyzes the underlying drivers of risks of forced labor, human trafficking, and hazardous child labor associated with a particular seafood product and producing country to help businesses focus their due diligence efforts to improve human rights and labor conditions. The purpose of this summary report is to highlight the trends, information gaps, and important takeaways from the 20 tropical tuna risk profiles.

1.1 Global tuna production

Globally, commercial tuna fisheries landed around 5.2 million metric tons of tuna with an estimated end value of US$40.8 billion in 2018 (Pew Charitable Trusts, 2020). There are seven major commercial tuna species: albacore, bigeye, skipjack, yellowfin, and Atlantic, Pacific, and Southern bluefin. Tropical tuna is defined as "Tuna species that inhabit warm-temperate tropical and subtropical waters, with temperatures generally greater than 18°C (although they can dive in colder waters). This group includes skipjack, yellowfin, and bigeye tuna" (ISSF, 2023a). The other major tuna species are classed as temperate tunas.

Skipjack tuna (*Katsuwonus pelamis*, SKJ), bigeye tuna (*Thunnus obesus*, BET), and yellowfin tuna (*Thunnus albacares*, YFT) comprised more than 94% of total tuna landings (metric tons) and more than 88% of the total tuna end value (USD) in 2018. Gear types used to harvest tuna include purse seine, longline, pole-and-line, handline, gillnet, troll, and others. Skipjack tuna and yellowfin tuna are primarily caught by purse seine gear, while bigeye tuna is primarily caught with purse seine and longline gear (Pew Charitable Trusts, 2020).

The three tropical tuna species – skipjack tuna, bigeye tuna, and yellowfin tuna – are the focus of the assessment in the SSRT risk profiles for tropical tuna fishing and processing.

1.2 Risk profiles for tropical tuna

Risk profiles for tropical tuna have been developed for 20 countries[2] (available at seafoodwatch.org/our-projects/seafood-social-risk-tool). These 20 countries were selected based on their significance in international trade as producers and processors of tropical tuna to the United States (US) and European Union (EU), two of the largest markets for tuna globally (Fernández-Polanco, 2017), and where sustainability is often high on the agenda for companies whose leverage in the supply chain may be used to advocate positive change within the seafood industry. After assessing trade significance, the countries were prioritized using a risk assessment that incorporated rankings from the fishing risk analysis of the Global Slavery Index (GSI),[3] the US Department of State's 2018 Trafficking in Persons Report,[4] and the 2018 List of Goods Produced by Child Labor or Forced Labor from the US Bureau of International Labor Affairs.[5] The assessment also looked at country ratification of the Palermo Protocol and the listing of countries by the EU carding scheme for illegal, unreported, and unregulated (IUU) fishing.

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[2]   Colombia, Ecuador, France, Ghana, Indonesia, Italy, Maldives, Mauritius, Mexico, Panama, Portugal, Philippines, South Korea, Senegal, Spain, Sri Lanka, Taiwan, Thailand, Venezuela, and Vietnam.
[3]   Available at https://www.globalslaveryindex.org/2018/findings/importing-risk/fishing/.
[4]   Available at https://www.state.gov/reports/2018-trafficking-in-persons-report/.
[5]   Available at https://www.dol.gov/sites/dolgov/files/ILAB/ListofGoods.pdf.

The SSRT country-, seafood industry-, and processing-level indicators were applied to all 20 countries. Fifteen countries were assessed against the SSRT fishing-level indicators.[6] Five countries were assessed for processing only as tuna production volumes fell below the SSRT cut-off point.[7] Finally, suggested due diligence priorities and questions were developed for all 20 countries.

This summary report compares the findings from across the 20 tropical tuna risk profiles and discusses the trends and information gaps and identifies important takeaways from across the 20 tropical tuna risk profiles. This report also summarizes the due diligence priorities and questions recommended for each country based upon the main issues identified. Full details of the findings are available in the individual tropical tuna risk profiles.

2 Methodology

The findings from the tropical tuna risk profiles[8] are compiled and compared by country and region using regional groupings following the World Bank classification system (World Bank, 2018) (see Table 1). Where quantitative evidence for indicators is available, the countries are compared individually and by region. Qualitative evidence for indicators is assessed by identifying common themes due to the non-standardized nature of data. The evidence cited in this summary report is mostly drawn from the risk profiles.

TABLE 1. REGIONAL GROUPINGS FOR THE SSRT TROPICAL TUNA RISK PROFILES

East Asia & the Pacific	Latin America & the Caribbean	Europe & Central Asia	South Asia	Sub-Saharan Africa
Indonesia	Colombia	France	Maldives	Ghana
Republic of Korea	Ecuador	Italy	Sri Lanka	Senegal
Philippines	Mexico	Spain		
Taiwan	Panama	Portugal		
Thailand	Venezuela			
Vietnam				

This report frames the discussion of the findings into the following:

- **Base risks**, which evaluate factors related to the social, economic, and political environment that may increase or decrease risks of forced labor, human trafficking, and hazardous child labor in a country.
- **Adjusted risks**, which evaluate factors that may increase or decrease risks of forced labor, human trafficking, and hazardous child labor in a country's seafood industry, and more specifically, in tropical tuna fishing and processing.
- **Due diligence recommendations**, which identifies topics to prioritize for human rights due diligence in tropical tuna producing countries based upon the main risks identified and provides sample questions for businesses to ask of their suppliers.

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[6] Colombia, Ecuador, Ghana, Indonesia, Republic of Korea (South Korea), Maldives, Mexico, Panama, Philippines, Senegal, Sri Lanka, Taiwan, Thailand, Venezuela, and Vietnam.

[7] Countries not assessed against the SSRT fishing indicators were France, Italy, Mauritius, Portugal, and Spain.

[8] Information on the SSRT methodology is available in the SSRT white paper.

2.1 Limitations

The comparison of findings and identification of common themes across countries are affected by two factors. First, the availability of evidence used to develop the risk profiles varies by indicator and country. This may partly reflect the concentration to date of research, funding, and industry scrutiny toward some countries and regions. Second, the impact of major global events that occurred during the development of the risk profiles upon governance and socioeconomic development, production and trade, migration, and social protections and conditions for workers. During the first year of the COVID-19 pandemic, the global economy shrank by approximately 3%, while global poverty and inequality increased and disproportionately impacted women, migrant workers, youth, urban workers, and small businesses (World Bank, 2022). Russia's war in Ukraine further exacerbated this fragile global state by triggering a rapid rise in food and energy prices and increasing vulnerabilities at both the household and government-levels (UNEP, 2022). Overall, these global events have had wide-ranging effects on the factors assessed by the SSRT risk indicators for all countries in this report. Data in the risk profiles refer to the most recent year available at the time of finalizing each profile.

3 Base risks: country level

The following sections summarize findings for the country-level risk indicators as grouped into four themes: Socioeconomic characteristics; Migration trends; Regulatory frameworks and enforcement; and Evidence of forced labor, human trafficking, and hazardous child labor. The country-level indicators are applied to all 20 SSRT countries.

3.1 Socioeconomic characteristics

According to the International Organization for Migration, victims of human trafficking are often from socioeconomically disadvantaged backgrounds or lower income countries and are trafficked to higher-income countries (McAuliffe and Triandafyllidou, 2021). The interlinkages of human trafficking, forced labor, and (hazardous) child labor with sustainable development are recognized by the 2030 Agenda for Sustainable Development, which includes the eradication of these human rights abuses under Goal 8.[9] Socioeconomic characteristics of the SSRT countries are assessed by measuring poverty, education, and the comparative positions of the countries in their respective regional economic power systems.

The SSRT assesses poverty using the Human Development Index (HDI),[10] the national poverty headcount ratio,[11] and the Global Hunger Index.[12]

The HDI measures health, education, and standard of living. The five SSRT-assessed countries with the highest HDI value are South Korea, Spain, France, Italy, and Portugal.[13] These countries continue to have the highest levels of development even after adjusting HDI values for inequality. The five SSRT countries with the lowest HDI values after adjusting for inequality are Senegal, Ghana, the Maldives, Indonesia, and the Philippines. The countries affected by the largest adjustments for inequality are Senegal, Ghana, Colombia, Mexico, Panama, and the Maldives, with their HDI values reduced by more than 20% after adjusting for inequality.

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[9]   See Target 8.7: https://sdgs.un.org/goals/goal8.
[10] Available at https://hdr.undp.org/data-center/human-development-index#/indicies/HDI.
[11] Available at https://data.worldbank.org/indicator/SI.POV.NAHC.
[12] Available at https://www.globalhungerindex.org/.
[13] HDI scores are not available for Taiwan.

The highest national poverty rates are recorded for Senegal, Mexico, Venezuela, Colombia, and Ecuador, with 25% or more of the population living below the national poverty line. Countries with the lowest recorded rates of poverty are Vietnam, the Maldives, Indonesia, Thailand, and Mauritius, with around 10% or less of the population living beneath the national poverty line. The region most represented by SSRT countries with higher national poverty rates is Latin America and the Caribbean, and the region most represented by SSRT countries with lower national poverty rates is East Asia and the Pacific, though it should be noted that national poverty estimates for South Korea and Taiwan are not available.

Of the 13 SSRT countries assessed in the Global Hunger Index, Venezuela and Indonesia were scored with a "Serious" level of hunger at the time of assessment. Both countries have since received an improved score reflecting a "Moderate" level of hunger in the 2023 Global Hunger Index.[14] The other assessed countries have a "Moderate" or "Low" level of hunger.[15]

All SSRT countries except Ghana and Senegal have literacy rates of at least 90% among adults aged 15 years and above.[16] Adult literacy rates are reported as 79% (as of 2018) and 51.9% (as of 2017) of the populations in Ghana and Senegal, respectively.[17] Senegal also has a low primary school completion rate at 60.54% (for 2020), while all other countries assessed have a primary completion rate of 89% or above. In contrast, only 11 out of 20 SRRT countries have lower secondary school completion rates of 90% or more, with Senegal again showing the lowest completion rate of the assessed countries at 37.1%. Tertiary enrollment rates have the most variation between SSRT countries; only South Korea and Spain have enrollment rates of over 95%. Tertiary enrollment in Italy, Portugal, and France is around 66%, which is lower than that of Venezuela at nearly 80%. Most other SSRT countries have tertiary enrollment rates in the range of 30–50%. The lowest tertiary enrollment rates are for Sri Lanka, Ghana, and Senegal, at 21.61%, 17%, and 14%, respectively. Data for Taiwan are not available for the education and literacy indicators.

3.2 Migration trends

Migration, whether cross-border or internal (domestic), is connected to risks of human trafficking, forced labor, and to some extent hazardous child labor. High immigration levels may coincide with generally lower migrant acceptance, and if there are limited migrant protections, with more discriminatory and/or exploitative labor practices.

The SSRT evaluates regional migration and human trafficking patterns, attitudes toward migrant workers, and existing legislation and regulations in place to protect migrant workers.

In the East Asia and Pacific region, Taiwan, Thailand, and South Korea have higher rates of immigration than emigration. Migrants often originate from countries in Southeast Asia, such as Indonesia, the Philippines, and Vietnam. There is greater variation in trafficking patterns among these migrant-receiving countries, however: Thailand is a trafficking destination for victims primarily from neighboring Myanmar and the South America and Sub-Saharan Africa regions; Taiwan is a trafficking destination for victims primarily from China and the Southeast Asia and South Asia regions; and South Korea is a trafficking destination for victims from South America, North Africa and the Middle East, Eastern Europe, and Southeast Asia.

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[14] See the 2023 Global Hunger Index, https://www.globalhungerindex.org/ranking.html.
[15] Countries not assessed by the Global Hunger Index were France, Italy, Maldives, Portugal, Spain, Taiwan, and South Korea.
[16] See individual risk profiles for gender-disaggregated education and literacy data.
[17] "Tropical Tuna Social Risk Profile: Ghana, Fishing and Processing" (Monterey, CA: Monterey Bay Aquarium, 2022); "Tropical Tuna Social Risk Profile: Senegal, Fishing and Processing" (Monterey, CA: Monterey Bay Aquarium, 2023).

Nearly all SSRT countries in the Europe and Central Asia region have higher immigration rates than emigration rates, except for Portugal. Italy is the largest recipient of EU asylum claims from North Africa and the Middle East, Sub-Saharan Africa, South Asia, and Eastern Europe. Spain receives a greater number of migrants from Latin America and the Caribbean. France, Italy, Portugal, and Spain are trafficking destinations for victims from nearly every region in the world, including Eastern Europe, Asia, South America, the Middle East, and Sub-Saharan Africa.

Migration is primarily intra-regional within the Latin America and Caribbean region. Intra-regional migration dynamics have been shaped more recently by national crises including civil conflict in Colombia and the political and economic crisis in Venezuela. Colombia and Panama are the only SSRT countries in the region with higher rates of immigration than emigration: notably, Colombia is a significant source country for refugees in neighboring countries but has also become a major destination for Venezuelans, while Panama receives refugees from Colombia and migrants and asylum seekers from Venezuela. Trafficking patterns among SSRT countries in Latin America and the Caribbean are typically intra-regional as well, though Mexico is also known to be a trafficking destination for victims from Eastern Europe, Asia, and Africa.

In South Asia, the Maldives has exceptionally high rates of immigration, while Sri Lanka continues to be primarily a migrant-sending country. Most immigrants in the Maldives come from other South Asian countries, such as Bangladesh, India, and Sri Lanka, while trafficking victims originate from South Asia, Eastern Europe, Africa, and Asia. Migrants from Sri Lanka travel to the Maldives and to the Middle East, Asia, Europe, Central America, and the US. Sri Lanka is not known to be a destination for human trafficking victims but is a transit country for trafficking routes from Pakistan to Australia and from Nepal to Oman.

All SSRT countries assessed in Sub-Saharan Africa – Ghana, Senegal, and Mauritius – have higher rates of emigration than immigration. Mauritians tend to emigrate to France, Canada, and Australia; Ghanaians to Europe, Central America, and the Middle East; and Senegalese to other parts of West and Central Africa and Europe. Little is known about human trafficking in Mauritius, except that it may be a transit country for victims from Madagascar to the Middle East. Ghana and Senegal are known to be destination countries for trafficking victims from other parts of Africa. Trafficking victims from these two countries may also be sent to other parts of Africa, as well as the Middle East, Europe, and Central America.

In addition to identifying migration trends, the SSRT measures attitudes toward migrant workers using the Migrant Acceptance Index.[18] The five SSRT countries scored as most accepting of migrants are Spain, Senegal, Ghana, Venezuela, and Taiwan (see Table 2). Out of the 18 SSRT countries assessed by the index, 12 countries score higher (more accepting) than the world average. Thailand is scored as the least accepting of migrants out of the 18 SSRT countries assessed and scores significantly lower than the regional and global averages.

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[18] "New Index Shows Least-, Most-Accepting Countries for Migrants," Gallup, Inc., August 23, 2017, https://news.gallup.com/poll/216377/new-index-shows-least-accepting-countries-migrants.aspx.

TABLE 2. MIGRANT ACCEPTANCE INDEX RANKINGS BY SSRT COUNTRIES (WHERE 1 = MOST ACCEPTING)

1. Spain	7. Portugal	13. Mexico
2. Senegal	8. South Korea	14. Panama
3. Ghana	9. Italy	15. Colombia
4. Venezuela	10. France	16. Indonesia
5. Taiwan	11. Vietnam	17. Ecuador
6. Philippines	12. Mauritius	18. Thailand

When comparing attitudes toward migrants within regions (see Table 3), Thailand is the least accepting of migrants in East Asia and the Pacific. In Europe and Central Asia, France is the least accepting of migrants. In Latin America and the Caribbean, Ecuador is the least accepting of migrants. In Sub-Saharan Africa, Senegal is the least accepting of migrants. None of the SSRT countries in South Asia are assessed by the Migrant Acceptance Index.

TABLE 3. MIGRANT ACCEPTANCE INDEX RANKINGS BY SSRT REGIONS (WHERE 1 = MOST ACCEPTING)

East Asia & the Pacific	Latin America & the Caribbean	Europe & Central Asia	South Asia	Sub-Saharan Africa
1. Taiwan 2. Philippines 3. South Korea 4. Vietnam 5. Indonesia 6. Thailand	1. Venezuela 2. Mexico 3. Panama 4. Colombia 5. Ecuador	1. Spain 2. Portugal 3. Italy 4. France	N/A	1. Senegal 2. Ghana 3. Mauritius

Less than half of the SSRT countries have formally ratified the International Convention on the Protection of the Rights of All Migrant Workers and Members of their Families (Migrant Workers Convention, see Appendix II). Notably, France, Italy, Portugal, and Spain have not ratified the Migrant Workers Convention as part of a wider EU decision by all Member States not to ratify it. As such, ratification would require EU-level coordination. Nevertheless, protections for migrant workers in these countries are relatively strong.

Other countries that have not ratified the Migrant Workers Convention provide more limited protections and limited access to social protection, health, and education for migrant workers. Migrant workers in Mauritius and South Korea are restricted in their ability to change employers. Undocumented migrant workers are afforded more limited access to social protection, health, and/or education in France, Spain, South Korea, and Thailand, and no mention was found of protections extending to undocumented migrant workers in Indonesia. Migrant-sending countries Indonesia, the Philippines, and Sri Lanka have all ratified the Migrant Workers Convention, but focus legal protections on nationals migrating to other countries.

3.3 Regulatory frameworks and enforcement

Governance affects both the underlying drivers of forced labor, human trafficking, and hazardous child labor such as poverty and education, as well as directly contributing to risks of forced labor, human trafficking, and hazardous child labor when there are gaps in legislation or poor enforcement of said legislation. Regulatory frameworks and enforcement are assessed through indicators on governance practices and systems, the ratification of relevant international conventions and domestication into national legal frameworks, the enforcement of relevant legislation, and the regulation of recruitment.

Governance practices and systems are assessed using four indices that examine several dimensions of governance: the Worldwide Governance Indicators (WGIs),[19] the Corruption Perceptions Index,[20] the Basel Anti-Money Laundering Index,[21] and the Global Rights Index.[22] The SSRT countries in Latin America and the Caribbean and the East Asia and the Pacific regions consistently score most poorly across the indicators for governance practices and systems.

The WGIs assess perceptions of governance across six indicators: voice and accountability, political stability and the absence of violence, government effectiveness, regulatory quality, rule of law, and control of corruption. Out of the 20 SSRT countries, Taiwan ranks most highly on average across the six indicators indicating better governance while Venezuela ranks most poorly. The SSRT countries in Latin America and the Caribbean receive the lowest rankings on average across the six indicators, with countries in East Asia and the Pacific also ranking poorly with the exceptions of Taiwan and South Korea. Similarly, Venezuela receives the lowest score among the SSRT countries in the Corruption Perceptions Index, with a score of 14 out of 100, where 0 represents "highly corrupt" and 100 represents "very clean." The index, which assesses perceived levels of public sector corruption, scores all the SSRT countries in the Latin America and Caribbean region below the global average of 43 out of 100. With the exceptions of Taiwan and South Korea again, all SSRT countries across Asia score below the global average. The SSRT countries in Europe and Central Asia rank higher in the WGIs indicating better governance and have higher scores in the Corruption Perceptions Index indicating lowest levels of corruption. The SSRT countries in Europe and Central Asia also have the lowest risk of money laundering and terrorist financing according to the Basel Anti-Money Laundering Index. However, there does not appear to be a regional trend among SSRT countries with the highest risk of money laundering, which are Senegal (Sub-Saharan Africa), Vietnam (East Asia and the Pacific), and Sri Lanka (South Asia).

The Global Rights Index rates countries on a scale from 1 to 5+ using information on violations of workers' rights, where 1 corresponds to "Sporadic violations of rights" and 5+ corresponds to "No guarantee of rights due to the breakdown of the rule of law." The index highlights the challenges to workers across all regions, with only one SSRT country (Italy) being rated "1" and more than half of the SSRT countries rated 3 "Regular violations of rights" or above. Almost all SSRT countries in East Asia and the Pacific received a rating of 5 "No guarantee of rights." Ecuador also received a rating of 5 and is notably identified in the 2023 Global Rights Index among the "ten worst countries for working people" because of restrictive laws that hinder the development of independent trade unions and violent and deadly repression by police in May 2022 of protests demanding respect for collective rights organized by Indigenous peoples' organizations and trade unions (ITUC, 2023).

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[19] Available at http://info.worldbank.org/governance/WGI.
[20] Available at https://www.transparency.org/en/cpi/.
[21] Available at https://index.baselgovernance.org/.
[22] Available at https://www.globalrightsindex.org/.

The ratification of eight international agreements relating to forced labor, human trafficking, child labor, decent work in fishing, and IUU fishing is assessed by the SSRT. Ratification of Conventions and Protocols is legally binding and ratifying countries should apply the Convention to national law. Thus, ratification drives changes in legislation and represents a commitment by governments to address the issues covered. Ratification of the selected agreements is relatively high among the assessed countries. Five international agreements are in force for nearly all SSRT countries:

- Forced Labour Convention, 1930 (No. 29)
- Abolition of Forced Labour Convention, 1957 (No. 105)
- Minimum Age Convention, 1973 (No. 138)
- Worst Forms of Child Labour Convention, 1999 (No. 182)
- UN Protocol to Prevent, Suppress, and Punish Trafficking in Persons, Especially Women and Children, 2003 (the Palermo Protocol).

The only exceptions are Taiwan, which is prevented from ratifying conventions by its official status, and South Korea, which has not yet ratified Convention No. 105. The Protocol to the Forced Labour Convention (P029), which was adopted in 2014, has only been ratified by seven of the SSRT countries, with Mexico ratifying it in June 2023 (ILO, 2023). Out of the 20 SSRT countries, 16 are party to the Port State Measures Agreement, but only four have ratified Convention No. 188 on Work in Fishing.

Despite ratification of these international agreements, there remain gaps in national-level legislation for forced labor, human trafficking, and hazardous child labor. While all SSRT countries have prohibited forced labor and criminalized human trafficking, national definitions of human trafficking in Colombia, Indonesia, Panama, South Korea, Venezuela, and Vietnam do not align with international law and several countries (Indonesia, Panama, Venezuela, and Vietnam) do not criminalize all forms of sex trafficking and/or labor trafficking (US Department of State, 2023). In Ghana and Senegal, lesser penalties are applied to some trafficking offenses depending on the circumstances: in Ghana, penalties applied to parents or guardians that facilitate human trafficking offenses are not in line with penalties for other serious crimes;[23] and, in Senegal, lesser penalties are prescribed for exploitation through forced begging.[24] While most SSRT countries have national legislation in place regarding the minimum age for work, at least 11 out of the 20 SSRT countries have gaps in legislation relating to the worst forms of child labor and/or hazardous child labor, including Venezuela, which has not identified hazardous occupations.[25]

In terms of the enforcement of relevant legislation, at the time of the assessment only five of the 20 SSRT countries were ranked "Tier 1" by the US Department of State's Trafficking in Persons Report: Colombia, France, the Philippines, Spain, and Taiwan. This means that these countries have demonstrated sufficient and appreciable effort to meet the minimum requirements of the US Trafficking Victims Protection Act. Most other SSRT countries were ranked "Tier 2," meaning that these countries do not meet the minimum standards of the US Trafficking Victims Protection Act but are demonstrating significant effort and progress toward such ends. At the time of the assessment in 2022, Senegal was ranked "Tier 2 Watch List" but has since been upgraded to "Tier 2" in 2023 for making increased efforts (US Department of State, 2023). Venezuela is the only SSRT country that is not considered to be making efforts to address human trafficking and is therefore ranked "Tier 3" by the Trafficking in Persons Report.

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[23] "Tropical Tuna Social Risk Profile: Ghana".
[24] "Tropical Tuna Social Risk Profile: Senegal".
[25] "Tropical Tuna Social Risk Profile: Venezuela, Fishing and Processing" (Monterey, CA: Monterey Bay Aquarium, 2022).

The enforcement of legislation relating to forced labor, human trafficking, and hazardous child labor is affected by insufficient capacity and poor coordination between the relevant authorities in several SSRT countries across all regions (Colombia, Ecuador, Ghana, Indonesia, Italy, the Maldives, Mauritius, Mexico, Panama, the Philippines, Senegal, South Korea, Sri Lanka, and Thailand). Across many of the same countries (Colombia, Ecuador, Ghana, Indonesia, Italy, the Maldives, Mexico, Panama, the Philippines, Senegal, South Korea, Sri Lanka, Taiwan, Venezuela, and Vietnam), evidence suggests that corruption and official complicity in human rights abuses further weaken enforcement.

Hence, while most SSRT countries have ratified international agreements on forced labor, human trafficking, and hazardous child labor and have largely incorporated those agreements into domestic legislation, the poor enforcement of forced labor, human trafficking, and hazardous child labor-related legislation is a notable risk factor at the country level.

In general, there is limited information regarding government oversight of recruitment agents. Few of the SSRT countries have ratified International Labour Organization (ILO) Convention 181, which sets forth international standards for the regulation of private employment agencies and the protection of workers that use them. Evidence suggests that private employment agencies are required to register with the government or apply for a license to operate in Colombia, Ghana, Italy, Mauritius, Mexico, the Philippines, and Thailand, but it is not clear the extent to which the accreditation and licensing of private employment agencies is enforced. There is some evidence of regulations prohibiting or restricting the charging of recruitment fees to workers in Colombia, Italy, Mauritius, Mexico, the Philippines, Taiwan, Thailand, and Vietnam. The Taiwanese government has carried out inspections of recruitment brokers, including follow-up inspections due to reports of document-withholding and illegal surcharges.[26]

The information gaps and varied legal frameworks and measures to ensure fair recruitment found in the SSRT profiles correspond to the findings of other initiatives in recent years.[27] Opaque and unregulated recruitment practices particularly relating to recruitment of migrant workers is increasingly recognized as a significant risk factor for forced labor, human trafficking, and hazardous child labor.

3.4 Evidence of forced labor, human trafficking, and hazardous child labor in the country

Widespread forced labor, human trafficking, and hazardous child labor in a country across multiple sectors and industries may indicate a systemic problem that could also affect the seafood industry. Understanding systemic issues connected to human rights abuses is particularly pertinent for food supply chains and extractive industries (agriculture, forestry, and mining) where conditions, drivers, and dynamics may be like those in seafood production.

Forced labor, human trafficking, and hazardous child labor have been found in the following industries of the SSRT countries: agriculture (including livestock, fisheries, and floriculture), construction, food processing, forced begging and criminality, manufacturing, mining, services (including domestic work, tourism, transportation, and hospitality), commercial sex work, and small-scale commerce. Among these industries, forced labor, human trafficking, and hazardous child labor appear to be the most common in agriculture, followed by sex work, construction, mining, manufacturing, and domestic services. More information on industries associated with forced labor, human trafficking, and hazardous child labor can be found in the individual tropical tuna risk profiles.

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[26] "Tropical Tuna Social Risk Profile: Taiwan, Fishing and Processing" (Monterey, CA: Monterey Bay Aquarium, 2022).

[27] See for example the ILO Fair Recruitment Initiative.

3.5 Information gaps and major takeaways

Data are publicly available for nearly all 20 countries across the country-level SSRT indicators. However, information gaps exist even at this broad level. Data relating to human development (poverty, education, and the economy) in Taiwan are not readily available using the selected datasets for the socioeconomic indicators. Additionally, the Maldives is frequently excluded from global indices used to assess governance and enforcement including the Global Rights Index, the Basel Anti-Money Laundering Index, the Migrant Acceptance Index, and the Global Slavery Index (GSI).

It is clear from the evidence that forced labor, human trafficking, and hazardous child labor are widespread issues that affect many, if not all, countries. Forced labor, human trafficking, and/or hazardous child labor is present in all 20 countries assessed. Sectors frequently implicated in these abuses across the 20 countries include agriculture, commercial sexual exploitation, construction, mining, manufacturing, and domestic services.

Countries that have better governance and lower public sector corruption (as assessed by indices) generally appear to correspond with those that have higher human development and lower inequality. However, these factors alone do not necessarily amount to lower base risks of forced labor, human trafficking, and hazardous child labor. Regional migration patterns, protections for migrant workers, and enforcement of labor legislation and union laws appear to have a significant influence on country-level risks. For example, South Korea is assessed as having high human development and is rated highly among nearly all the governance practices and systems indicators but has limited protections for migrant workers, poor enforcement of labor legislation, and is rated poorly regarding respect for workers' rights. Risk factors frequently identified across the SSRT countries include higher rates of immigration or internal migration and poor acceptance of migrants; barriers to workers organizing; and poor enforcement of legislation for human trafficking, forced labor, and hazardous child labor – often due to resource limitations and sometimes due to corruption and official complicity.

4 Adjusted risks: seafood industry

The operating context in the seafood industry of a country may increase or decrease risks of forced labor, human trafficking, and hazardous child labor compared to the base risks at a country level. For example, poor governance, weak law enforcement capacity, and opaque recruitment systems may interact with low levels of organization among seafood workers to increase risks overall. Conversely, systems in place in the seafood industry may mitigate some base risks, for example, through seafood industry-specific initiatives. It is important therefore to explore the seafood industry-specific risks in conjunction with the base risks and the risks associated with specific fisheries and processing supply chains.

The following sections summarize findings for seafood industry-level indicators, grouped into four themes: Evidence of forced labor, human trafficking, and hazardous child labor; Regulatory environment and enforcement; Worker engagement mechanisms; and Voluntary schemes and corporate governance. The seafood industry-level indicators were applied to all 20 SSRT countries.

4.1 Evidence of forced labor, human trafficking, and hazardous child labor in the seafood industry

Evidence of forced labor, human trafficking, and hazardous child labor in the seafood industry is reviewed and where necessary assessed against the ILO indicators of forced labor and the definition of hazardous child labor found in ILO Recommendation 190 to determine whether it should be used as "direct evidence" or as indicators of forced labor and hazardous child labor.[28]

There is direct evidence of forced labor, human trafficking, and/or hazardous child labor in the seafood industry of 11 out of the 20 SSRT countries (Ecuador, Ghana, Indonesia, the Maldives, the Philippines, Senegal, South Korea, Sri Lanka, Taiwan, Thailand, and Vietnam). The evidence is connected to fishing in all 11 countries, in aquaculture in Ecuador, and in seafood processing in Indonesia, Thailand, and Vietnam. There are indicators of forced labor and/or hazardous child labor in 10 countries (Colombia, Ecuador, Ghana, Indonesia, Senegal, South Korea, Sri Lanka, Taiwan, Thailand, and Vietnam) in connection to fishing in all 10 countries, and in seafood processing in Colombia, Indonesia, and Thailand.

Evidence of forced labor, human trafficking, and hazardous child labor (including direct evidence and indicators of forced labor and hazardous child labor) in the seafood industry is found in all regions except for Europe and Central Asia but is particularly well documented for SSRT countries in East Asia and the Pacific. This may be due to the amount of attention directed at the region by the international seafood community since investigative reporting on forced labor in Thailand's seafood industry shone a light on the issue in 2014. In contrast, very little evidence of forced labor, human trafficking, and hazardous child labor is apparent for SSRT countries in Latin America and Caribbean, with much of the evidence relating to children working in the seafood industry lacking detail to conclude hazardous child labor. However, this lack of conclusive evidence does not mean that human rights abuses do not exist in the seafood industry of those countries, but rather that they may not have been well documented publicly.

In East Asia and the Pacific, direct evidence is found more frequently in connection to human trafficking and forced labor of foreign migrant workers, particularly in Thailand, South Korea, and Taiwan. Nevertheless, evidence of child labor or hazardous child labor is available for all SSRT countries in East Asia and the Pacific except South Korea and Taiwan. Much of the evidence for Indonesia relates to exploitation of workers on foreign fishing vessels operating in Indonesian waters and Indonesian fishers working on board foreign distant water fishing (DWF) vessels, with little evidence found of forced labor, human trafficking, and hazardous child labor in Indonesia's seafood industry. There is little recent evidence of forced labor and hazardous child labor in the Philippines' seafood industry, with some of the evidence more than 10 years old. Finally, most direct evidence for Vietnam's seafood industry relates to hazardous child labor. Indicators of forced labor in the SSRT countries in East Asia and the Pacific include deceptive recruiting practices, retention of identity documents, withholding or nonpayment of wages, and verbal and physical abuse.

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[28] For the ILO definitions of indicators of forced labor and hazardous child labor, see:
"ILO Indicators of Forced Labour" (Geneva: International Labour Organization, October 1, 2012).
Available at https://www.ilo.org/global/topics/forced-labour/publications/WCMS_203832/lang--en/index.htm.
"Worst Forms of Child Labour Recommendation," Pub. L. No. No. 190, R190 (1999).
Available at https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:R190.

In South Asia, there is direct evidence of human rights abuses for both Sri Lanka and the Maldives. In Sri Lanka, the seafood industry has been connected to child labor, including hazardous child labor in fishing though evidence from the Sri Lankan government suggests that child labor in fisheries is not prevalent. Evidence of debt-bonded fishers is found as an indicator of forced labor in Sri Lanka. Evidence in the Maldives is limited to a claim by the US Department of State's Trafficking in Persons Report that human traffickers target migrant workers on fishing and cargo boats in the Maldives for forced labor. No further evidence, including indicators of forced labor or hazardous child labor, is available for the Maldives.

In Sub-Saharan Africa, direct evidence of human rights abuses in seafood is found in Ghana and Senegal relating to both inland/artisanal production and industrial production. In Ghana, forced child labor, human trafficking, and hazardous child labor is found primarily in lake fishing and processing, while forced labor and indicators of forced labor among adults has been documented onboard industrial trawlers registered in Ghana and crewed by Ghanaian fishers but beneficially owned by Chinese companies. Similarly in Senegal, there is evidence of forced child labor in fishing, potentially hazardous child labor in artisanal fishing, and child labor in seafood processing, as well as forced labor on Senegalese-flagged, but Chinese-owned and operated fishing vessels. Conversely, no direct evidence linking the seafood industry in Mauritius to forced labor, human trafficking, or hazardous child labor is available. However, cases of forced labor and trafficking of fishing vessel workers have been documented on foreign vessels operating in or near Mauritian waters. There are reports of children working in fishing in Mauritius, but hazardous child labor cannot be concluded from the available evidence.

In Latin America and the Caribbean, direct evidence of forced labor, human trafficking, and hazardous child labor is only found for Ecuador, primarily in shrimp farming and fishing. In Ecuador, fishers are also found to be vulnerable to debt bondage because of piracy and to exploitation by drug traffickers. There is no direct evidence for Colombia, Panama, Mexico, or Venezuela. Nevertheless, reports of children working in fishing in Ecuador, Panama, and Venezuela and in fishing and seafood processing in Colombia are available, but hazardous child labor cannot be concluded from the available evidence.

4.2 Regulatory environment and enforcement

Regulatory frameworks and enforcement specific to labor in the seafood industry are assessed by the SSRT. Overall, limited information on seafood-specific labor regulations is identified by the tropical tuna risk profiles. Thailand is among the countries where more information is available, perhaps due to the greater amount of attention that Thailand's seafood industry has received, pressure on the Thai government to improve conditions for fishers, and the country's ratification in 2019 of the Work in Fishing Convention, 2007 (No. 188).

Little evidence of additional protections or exemptions from protections for seafood workers is apparent, with the main regulatory divide appearing to instead be between formal and informal sectors. Notably in Taiwan, there is a regulatory divide between regulations applied to crew in coastal water fishing versus those applied to crew in the DWF fleet.

Where seafood-specific information is available, it mostly related to regulations for fishing, for example, regulations covering work contracts and occupational health and safety for Indonesian fishers. Additionally, identified regulations include those specific to industrial fishing, for example, regulations covering working and living conditions on board industrial fishing vessels flagged in the Philippines.

The GSI 2018 examines two sets of characteristics to assess the risk of modern slavery in fishing: "National Fisheries Policy" and "Wealth and Institutional Capacity" (see Table 4). National Fisheries Policy is assessed using three risk factors: frequent fishing outside of the vessel's national waters, or exclusive economic zones (EEZs); a dependence on DWF; and large vessel and fuel subsidies provided by the national government. A higher incidence of these factors indicates a more enabling environment for forced labor, human trafficking, and hazardous child labor (Walk Free Foundation, 2018). Wealth and Institutional Capacity uses three risk factors to evaluate the effectiveness of enforcement: a low GDP per capita of the fishing country, a low average value of a fishery's catch per fisher, and a high level of unreported fishing by fishing fleets. A higher incidence of these factors indicates lower capacity to oversee and enforce seafood industry regulations and policies (Walk Free Foundation, 2018).

TABLE 4. GLOBAL SLAVERY INDEX 2018 FISHING RISK FACTORS

Risk factors associated with seafood regulations & policies	Risk factors associated with enforcement capacity & effectiveness
Frequent fishing outside EEZs Dependence on DWF Large vessel and fuel subsidies	Low GDP per capita Low average value of catch per fisher High levels of unreported fishing

The GSI 2018 fishing risk assessment classifies risk in 19 of the 20 SSRT countries, excluding the Maldives in South Asia. Countries identified by the GSI 2018 as being at high risk of modern slavery in their respective fishing industries include the SSRT countries Spain, South Korea, Taiwan, and Thailand (Walk Free Foundation, 2018). More than half of the SSRT countries assessed in the GSI 2018 have regulatory environments that are considered "high risk." The effectiveness of enforcement is also considered "high risk" for Thailand, Ghana, and the Philippines (see Table 5).

TABLE 5. SSRT COUNTRIES ASSESSED AS "HIGH RISK" BY THE GLOBAL SLAVERY INDEX 2018 FISHING RISK ASSESSMENT

Region	Country	Risk levels associated with:	
		Seafood regulations & policies	Enforcement capacity & effectiveness
East Asia & the Pacific	Philippines	High risk	High risk
East Asia & the Pacific	Thailand	High risk	High risk
Sub-Saharan Africa	Ghana	High risk	High risk
East Asia & the Pacific	Taiwan	High risk	Medium risk
Europe & Central Asia	Italy	High risk	Medium risk
Latin America & the Caribbean	Panama	High risk	Medium risk
Latin America & the Caribbean	Venezuela	High risk	Medium risk
South Asia	Sri Lanka	High risk	Medium risk
East Asia & the Pacific	South Korea	High risk	Low risk
Europe & Central Asia	France	High risk	Low risk
Europe & Central Asia	Spain	High risk	Low risk

The remaining eight SSRT countries assessed in the GSI 2018 have regulatory environments that are considered at "medium risk" of enabling forced labor, human trafficking, and hazardous child labor in the seafood industry. Vietnam, Colombia, and Senegal are the three countries in this group whose limited enforcement capacity denotes a "high risk" (see Table 6).

TABLE 6. SSRT COUNTRIES ASSESSED AS "MEDIUM RISK" BY THE GLOBAL SLAVERY INDEX 2018 FISHING RISK ASSESSMENT

Region	Country	Risk levels associated with:	
		Seafood regulations & policies	Enforcement capacity & effectiveness
East Asia & the Pacific	Vietnam	Medium risk	High risk
Latin America & the Caribbean	Colombia	Medium risk	High risk
Sub-Saharan Africa	Senegal	Medium risk	High risk
East Asia & the Pacific	Indonesia	Medium risk	Medium risk
Europe & Central Asia	Portugal	Medium risk	Medium risk
Latin America & the Caribbean	Ecuador	Medium risk	Medium risk
Latin America & the Caribbean	Mexico	Medium risk	Medium risk
Sub-Saharan Africa	Mauritius	Medium risk	Medium risk

Evidence found on implementation and enforcement of seafood industry-specific regulations and policies predominantly relates to environmental fisheries management, for example, fisheries observers and electronic monitoring systems. Where information relates to enforcement of labor regulations in the seafood industry, it indicates challenges with enforcement capacity and a lack of clarity about institutional responsibilities. For example, in South Korea, there is evidence of concerns about an insufficient number of vessel inspections and vessels avoiding returning to port. Insufficient capacity to inspect vessels is noted as a particular concern for DWF, for example, in Taiwan where enforcement authorities do not have enough staff or the specialist knowledge needed to identify, investigate, and prosecute forced labor in the country's DWF fleet. In addition, overlapping responsibilities between the designated authorities overseeing fisheries management and those overseeing labor are noted, for example, in South Korea, Taiwan, and Indonesia. Jurisdictional disputes between the Ministries of Employment and Labor, Ministry of Oceans and Fisheries, and the coast guard are cited as a particular hindrance for labor law enforcement in fisheries in South Korea. Nonetheless, some evidence of efforts to improve implementation and enforcement is available, for example, increased inspection coverage in Taiwan, special investigations into child labor in the fishing industry in Sri Lanka, and training activities on child labor in fisheries in Ecuador.

Overall, the regulatory environments governing the seafood industry in the 20 countries assessed by the SSRT vary significantly and where legislation is in place to protect resources and workers alike, the evidence suggests that implementation, monitoring, and enforcement is often weak.

4.3 Worker engagement mechanisms

Worker engagement mechanisms in the seafood industry are measured by the extent to which third-party monitors have access to workplaces, and workers have access to trade unions and functional grievance mechanisms. Very little information specific to the seafood industry is available concerning these indicators, indicating potentially limited mechanisms for seafood workers to engage the industry and employers on improvements.

Information on third-party monitoring mainly relates to observers onboard fishing vessels; however, these observers collate data on the environmental management of the fishery and not the workers and are themselves vulnerable to a risk of human rights abuses.

Publicly available data on seafood workers' access to functional grievance mechanisms are very limited. In some cases, where information is found it indicates that workers have limited safe access to grievance mechanisms, for example, there appear to be risks for fishers in Indonesia and Taiwan that making complaints could lead to repercussions from ship captains. Worker hotlines are present in some countries (the Philippines and Thailand) though their effectiveness for seafood workers is unclear.

Most countries assessed do not appear to restrict seafood workers' access to join trade unions in law. However, the ability of workers more generally to organize is often limited by barriers to forming and joining trade unions, with access varying significantly by country.

There do not appear to be any legal impediments for seafood workers to form and join unions and access to unions seems to be generally good in Europe and Central Asia, namely France, Italy, Portugal, and Spain. In other SSRT countries, there are no apparent legal impediments specifically for seafood workers to access trade unions, but regulations still limit access. There is evidence of restrictive laws and policies affecting access to trade unions in several SSRT countries including Panama, Thailand, and Vietnam, where laws preclude certain groups of workers from forming or leading unions. Nonetheless, there is some evidence of improvements. For example, in Thailand, migrant workers are unable to form or lead unions, but some provisions are now in place in Thailand's seafood industry to support migrant fishers in accessing unions, and civil society organizations play an important role in representing seafood workers.

Meanwhile, in SSRT countries where legislation is less restrictive and trade unions are present, there may still be barriers to participating in union activities such as limited time spent at shore, as noted for fishers in Taiwan's DWF, and anti-union discrimination. Evidence of anti-union practices in the seafood industry is recorded for Colombia and Indonesia. Evidence of anti-union practices not specific to the seafood industry is also recorded in the assessments for several countries in Latin America and the Caribbean (Ecuador and Mexico), Sub-Saharan Africa (Ghana and Mauritius), South Asia (the Maldives and Sri Lanka), and East Asia and the Pacific (the Philippines and South Korea), indicating widespread concerns regarding the ability of workers to organize in most of the assessed tropical tuna producing countries.

Overall, low levels of worker organization, limited access to complaints mechanisms, and a lack of access to workplaces for third-party monitors, or evidence thereof, seem to be significant risk factors for labor rights and human rights concerns in the seafood industries of tropical tuna producing countries, with few exceptions.

4.4 Voluntary schemes and corporate governance

Voluntary schemes and corporate governance initiatives can include improvement programs and other multistakeholder initiatives, verification, and third-party certification schemes. The quality and relevance to human rights may vary significantly. The trends considered for this indicator are based on whether they are primarily led by government, industry associations, large multinational corporations, or smaller industry actors, such as individual processing facilities and fishing fleets.

In East Asia and the Pacific, efforts identified in SSRT countries include voluntary certification schemes, multistakeholder initiatives, and corporate governance initiatives by large corporations. Third-party certification with a social component to the standard is present for seafood production in Indonesia (Fair Trade), the Philippines (Responsible Fishing Vessel Standard and Seafood Processing Standard), and Taiwan (Friend of the Sea). Corporate governance initiatives exist for two of the world's largest seafood companies in South Korea and Thailand. Multistakeholder initiatives including industry associations and fishery improvement projects with a social component are identified in Indonesia, the Philippines, and Thailand. Several of the efforts recorded include a traceability component.

In Europe and Central Asia, information for this indicator is only available for France and Spain, where there is evidence of efforts by large multinational and national corporations, as well as third-party certification in Spain to the Spanish Association for Standardization and Certification (AENOR)'s Responsible Tuna Fishing (APR) vessel certification and chain of custody program. There are no examples for Italy or Portugal.

In Latin America and the Caribbean, governments are the primary leaders in initiating voluntary schemes in Ecuador and Panama with evidence including efforts by the Ecuadorian Government and the tuna industry to implement a certification program for the sustainable production of tuna in Ecuador. Mexico offers a more diverse landscape, with industry associations and smaller industry actors leading these initiatives. There are no examples for Colombia or Venezuela.

In South Asia, evidence is primarily related to voluntary certification schemes. In the Maldives, voluntary certification (Fair Trade) of Maldivian pole-and-line tuna fisheries is of note. There is some evidence of tuna processing facilities obtaining certification to social standards (SA8000) in Sri Lanka.

Finally, efforts identified in the three SSRT countries in Sub-Saharan Africa – Ghana, Senegal, and Mauritius – include efforts by large multinational corporations in Ghana and Mauritius or multistakeholder initiatives to spearhead schemes.

Summing up, the presence of voluntary industry schemes to protect seafood workers vary but efforts appear to be largely led by individual corporations and there is no evidence to suggest that they can make up for the gaps in implementation and enforcement of legislation alone.

4.5 Information gaps and major takeaways

Information found on risk factors assessed at the seafood industry-level primarily focuses on fishing, with less information found for aquaculture or seafood processing. Among the four themes reviewed in this section – direct evidence of forced labor, regulatory environment and enforcement, worker engagement mechanisms, and voluntary schemes – the least amount of information is for worker engagement mechanisms, which covers worker access to trade unions, access to functional grievance mechanisms, and third-party monitor access to workplaces. No publicly available information on worker

access to functional grievance mechanisms is available for 13 out of 20 countries (see Appendix I and Appendix II for information on "unknown" seafood industry indicators by region and country).

The greatest numbers of unknowns for the seafood industry risk indicators are recorded for Latin America and the Caribbean, particularly Colombia and Venezuela. Significant information gaps are also found for SSRT countries in Europe and Central Asia, with the least information for Portugal out of all 20 countries. Sub-Saharan Africa has the third greatest number of indicators with unknowns, particularly Mauritius. Fewer information gaps are found for Sub-Saharan Africa and South Asia. The region with the most publicly available information appears to be East Asia and the Pacific.

The availability of evidence of forced labor, human trafficking, and hazardous child labor in the seafood industries of the SSRT countries may be directly correlated with disproportional industry scrutiny, regulatory attention and research, and international advocacy toward certain regions such as East Asia and the Pacific. The little data found for Latin America and the Caribbean may mean that there is no public documentation of human rights abuses – not that they are not occurring at all.

This disproportional attention also extends to different stages of the seafood value chain. Namely, most information on regulation and enforcement targets at-sea work, while there is little information for fish processing – and even then, such regulations appear to address primarily environmental concerns over social and labor-related ones. In general, enforcement capacity and effectiveness appear to be higher among the higher-income SSRT countries, who have more resources to devote to the implementation and monitoring of seafood industry policies and regulations. Despite this enforcement capacity, many of these higher-income countries are at high risk of promoting seafood regulations and policies that contribute to an increased risk of human rights abuses in seafood production. Meanwhile, little information on worker engagement mechanisms is readily available. Therefore, greater attention should be directed to regions and countries with significant information gaps and to increasing transparency around risk factors for forced labor, human trafficking, and hazardous child labor in the seafood industry of all regions and countries.

5 Adjusted risks: fishing

The following sections summarize findings for the fishing indicators as assessed for tropical tuna across four themes: Evidence of forced labor, human trafficking, and hazardous child labor; Activity at sea; Workforce characteristics; and Recruitment and contracts. The following 15 SSRT countries are evaluated in this section: Colombia, Ecuador, Ghana, Indonesia, the Maldives, Mexico, Panama, the Philippines, South Korea, Sri Lanka, Senegal, Taiwan, Thailand, Venezuela, and Vietnam.

5.1 Evidence of forced labor, human trafficking, and hazardous child labor in tropical tuna fishing

Frequently where evidence of human rights abuses in fishing is reported, the nature of the fishing practice, i.e. the target species and gear type, are not reported, making it difficult to assess risks for specific seafood products using direct evidence alone. This is the case in this assessment because evidence of forced labor, human trafficking, and hazardous child labor in tropical tuna fishing is limited.

Direct evidence of forced labor as specific as possible to the tuna industry is only found for two SSRT countries out of the 15 assessed for fishing: South Korea and Taiwan. Evidence of systematic practices of forced labor, as well as conditions indicative of forced labor, are documented in South Korea and Taiwan's DWF fleets, of which tuna is one of the primary species caught.[29] Indicators of forced labor in tuna fishing are found in the tuna industries of Indonesia and the Philippines, though some of the evidence for the Philippines is more than 10 years old. The indicators identified include debt bondage and abusive working conditions.[30] There is also anecdotal evidence of child labor in handline tuna fishing in the Philippines.[31] By region, evidence relating to tuna fishing is only found in SSRT countries in East Asia and the Pacific.

There is no evidence of forced labor, human trafficking, and hazardous child labor in the tuna fishing industries of the remaining 11 SSRT countries (Colombia, Ecuador, Ghana, the Maldives, Mexico, Panama, Senegal, Sri Lanka, Thailand, Venezuela, and Vietnam). Importantly, the lack of evidence in tuna fishing in these countries does not necessarily mean that such abuses do not exist, with direct evidence of human rights abuses identified in the wider seafood industry of nearly all these countries (see Evidence of forced labor, human trafficking, and hazardous child labor in the seafood industry). Some concerns are flagged by the risk profiles for Ghana, the Maldives, Thailand, and Vietnam. These include evidence from Ghana that some tuna fishing vessels may be beneficially owned by Chinese companies that also operate trawl vessels on which forced labor has been documented;[32] the suspension of longline fishing in the Maldives, including longline tuna fishing by the Maldivian Government in response to an alert from the European Commission about human trafficking and forced labor activities in the Maldives longline fleet;[33] the systemic nature of forced labor, human trafficking, and hazardous child labor in Thailand's fishing industry;[34] and the reliance of Vietnamese tuna fishers on credit from supply chain intermediaries, which presents a risk of debt bondage.[35]

5.2 Activity at sea

The SSRT assesses activity at sea using the following indicators: Days at sea; Transshipment; Targeting overexploited fish stocks; IUU fishing; Suspect or illegal flagging practices; and Automatic identification system (AIS) dark spots.

Overall, days at sea and transshipment appear to be the more significant risk factors for human rights abuses in tropical tuna fishing, indicating that risks are likely lower in smaller-scale coastal fleets. With regard to the other indicators used to assess activity at sea, there is no clear pattern between adverse conditions, e.g. overexploited fish stocks or IUU fishing, and the evidence found connecting forced labor, human trafficking, and hazardous child labor to tropical tuna fishing.

Tuna fishing vessels spend more than 30 days at sea in seven of the SSRT countries (Ghana, Mexico, the Philippines, Senegal, Sri Lanka, South Korea, and Taiwan). Evidence found for South Korea and Taiwan's DWF, which engage in tuna fishing and have been connected to forced labor, indicates that vessels can spend months to years at sea. Similarly, tuna fishing vessels in the Philippines, which have been connected to indicators of forced labor, can spend 6–12 months at sea and in some cases more than a year. Comparably, tuna fishing vessels in Ghana, Mexico, and Sri Lanka spend 1–3 months at

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[29] "Tropical Tuna Social Risk Profile: Taiwan"; "Tropical Tuna Social Risk Profile: Republic of Korea, Fishing and Processing" (Monterey, CA: Monterey Bay Aquarium, 2023).

[30] "Tropical Tuna Social Risk Profile: Philippines, Fishing and Processing" (Monterey, CA: Monterey Bay Aquarium, 2022); "Tropical Tuna Social Risk Profile: Indonesia, Fishing and Processing" (Monterey, CA: Monterey Bay Aquarium, 2022).

[31] "Tropical Tuna Social Risk Profile: Philippines".

[32] "Tropical Tuna Social Risk Profile: Ghana".

[33] "Tropical Tuna Social Risk Profile: Maldives, Fishing and Processing" (Monterey, CA: Monterey Bay Aquarium, 2022).

[34] "Tropical Tuna Social Risk Profile: Thailand, Fishing and Processing" (Monterey, CA: Monterey Bay Aquarium, 2022).

[35] "Tropical Tuna Social Risk Profile: Vietnam, Fishing and Processing" (Monterey, CA: Monterey Bay Aquarium, 2022).

sea on average. In Senegal, tuna fishing vessels may spend only 2–3 days up to several months at sea. There is no information for tuna fishing in Indonesia and Thailand or in almost all SSRT countries in Latin America and the Caribbean.

Transshipment at sea is the practice of offloading catch onto refrigerated cargo vessels called "reefers," which also resupply long-haul vessels with food, water, bait, crew, and fuel. While it is not possible to establish transshipment at sea as a direct cause of forced labor or human trafficking, the practice allows vessels to stay at sea for longer periods. Both South Korea and Taiwan's DWF fleets are reported to engage in transshipment at sea. According to a report by the Stimson Center, nearly 20% and 4% of South Korea and Taiwan's DWF activity, respectively, is potentially transshipped (Yozell and Shaver, 2019). Evidence of transshipment in tuna fishing is also reported for Panama and the Philippines, and to a more limited extent in Mexico and Vietnam. Thailand is also known to engage in transshipment practices that have been associated with forced labor and human trafficking, but ties to the tropical tuna industry are not clear. In contrast, transshipment is banned by the governments of Ghana, Indonesia, the Maldives, and Sri Lanka. Colombia, Venezuela, and Ecuador are members of the Inter-American Tropical Tuna Commission (IATTC), which bans at-sea transshipment at the regional level, though it should be noted that this ban does not prohibit these countries from receiving transshipped tuna from foreign-flagged vessels.

As noted above, there is no clear correlation between the targeting of overexploited tuna fish stocks and the known risks of forced labor, human trafficking, and hazardous child labor found in the SSRT tropical tuna risk profiles. The general assumption has been that there are likely to be greater risks of forced labor, human trafficking, and hazardous child labor associated with fishing of overexploited stocks as vessels may spend more time at sea to increase catch and exploit workers to reduce costs. Information regarding overexploitation of stocks varies within the risk profiles due to the different time periods when the countries are assessed. For better comparison, the latest available evidence is used here from the November 2023 Status of the Stocks report for tuna from the International Seafood Sustainability Foundation (ISSF). According to the ISSF report, bigeye tuna and yellowfin tuna stocks targeted in the Indian Ocean by Indonesia, South Korea, the Maldives, Sri Lanka, and Taiwan are currently overfished, and overfishing is occurring. In addition, bigeye tuna targeted in the Atlantic Ocean by Colombia, Senegal, Taiwan, and Venezuela, is overfished but overfishing is not occurring. Tuna caught in the Western Central Pacific Ocean is not overfished and overfishing is not occurring (ISSF, 2023b). Therefore, only some of the tuna stocks targeted by South Korea, Taiwan, and Indonesia, which have been connected to evidence of forced labor or indicators of forced labor in tuna fishing, are overexploited. Tuna caught by the Philippines, which has also been connected to indicators of forced labor in tuna fishing, is not overexploited.

Ratings from the Monterey Bay Aquarium's Seafood Watch program for the tropical tuna fisheries targeted by the SSRT countries range from "Avoid" to "Best Choice." All 15 of the SSRT fishing countries target tuna fisheries that have been rated "Avoid" by Seafood Watch. Various types of fishing gear are used by the SSRT countries to harvest tropical tuna including purse seine, longline, troll, and hand-operated pole-and-line gear. Purse seine is the dominant gear used to capture tuna in the Atlantic Ocean, Indian Ocean, Eastern Pacific Ocean, and Western and Central Pacific Oceans (ISSF, 2023b). Across the SSRT countries, tuna fisheries using associated purse seine gear or drifting longlines are rated "Avoid" by Seafood Watch and tuna fisheries using unassociated purse seine gear or deep-set longlines are mainly rated "Good Alternative." A "Best Choice" rating is given to tuna fisheries using troll and hand-operated pole-and-line gear.

The risk of IUU fishing[36] assessed using several resources, including the IUU Fishing Index and the European Commission's list of procedures, is identified across SSRT countries in all regions assessed against the SSRT fishing indicators, namely East Asia and the Pacific, South Asia, Sub-Saharan Africa, and Latin America and the Caribbean. The IUU Fishing Index assesses countries based on the degree to which they are exposed to and effectively combat IUU fishing using three indicators of IUU fishing: prevalence, vulnerability, and response (IUU Fishing Index, 2023). Out of the SSRT fishing countries, Ghana received the lowest score in the IUU Fishing Index 2019, indicating a lower risk of IUU fishing, while Taiwan and Vietnam received the highest scores and scored among the 10 worst-performing countries in the Index, indicating a higher risk of IUU fishing. In addition, Indonesia features among the 10 worst-performing countries in the 2019 Index for two out of three indicator types (IUU Fishing Index, 2023). Notably, South Korea receives a considerably worse score in the IUU Fishing Index 2021, moving into the list of 10 worst-performing countries in the Index, while Vietnam scores noticeably better (IUU Fishing Index, 2023). Out of the 15 SSRT countries assessed for fishing, nine have previously been issued a "yellow card" by the European Commission for failing to adequately address IUU fishing, with Ecuador, Panama, and Vietnam yet to have this revoked. There is not a clear difference in IUU risk among regions.

Of the 15 SSRT countries assessed, Panama and Sri Lanka are identified as flag of convenience (FOC) countries, meaning that they allow ships owned in other countries to be registered to their flags, and Taiwan is known for its use of FOCs from other countries in its DWF fleets. Because FOCs can be connected to lower regulations, vessels using FOCs may be subject to less oversight and working conditions onboard may be less well managed.

An increasing number of vessels now use AIS devices to transmit their location at sea to other vessels. In addition to serving as a safety measure, this information can be used to track the activity of vessels at sea and increase transparency regarding their behavior. However, many fishing vessels remain untracked and while AIS devices may be turned off in case of security concerns, they can also be turned off to hide illegal activity. The presence of AIS "dark spots" when vessel positions are not transmitting or AIS is turned off may indicate a higher risk of illegal activity (Global Fishing Watch, 2023). Though reports are not specifically tied to tropical tuna, there is evidence that some fishing vessels from Vietnam and Taiwan selectively turn off their AIS to evade law enforcement when fishing illegally. In the Maldives and Mexico, AIS is not in widespread use, leaving many vessels dark. There is no relevant information for around half of the SSRT fishing countries (Colombia, Ecuador, Ghana, Panama, South Korea, Thailand, and Venezuela).

Despite significant data gaps and clear regional variation, it is quite clear that across the tuna fishing industry, fisheries practices that are often associated with forced labor are common, particularly in the DWF fleets.

5.3 Workforce characteristics

Workforce characteristics including the proportion of migrant workers, ethnic minorities, and other marginalized groups employed in tropical tuna fishing are assessed to identify the presence of more vulnerable workers.

A high proportion of migrant workers in a country's fishing fleet indicates higher risk because migrant workers often do not have access to the same legal rights, social benefits, and work resources as local workers. Ethnic minorities and other marginalized groups may also face greater risks of labor

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[36] See https://www.fao.org/iuu-fishing/background/what-is-iuu-fishing/en/ for a definition of IUU fishing.

discrimination and exploitative practices. Of the SSRT countries assessed, a significant proportion of foreign migrant workers are employed in Taiwan and South Korea's DWF.[37] More than 60% of fishers in South Korea's DWF fleet, of which tuna is a major targeted species, are estimated to be migrant workers.[38] Origin countries for migrant workers employed in Taiwan and South Korea include Indonesia, the Philippines, and Vietnam. Thailand's fisheries also employ a significant number of foreign migrant workers, though the information found is not specific to tropical tuna. Countries where local or internal migrants are thought to work in tuna fisheries are Senegal, Ghana, the Maldives, Mexico, the Philippines, Vietnam, and Indonesia, some of whom enforce laws regulating the number of foreign migrants in the fishing industry. Evidence for migrant labor in the tuna industry is not found for Colombia, Ecuador, Panama, Sri Lanka, or Venezuela. There is no information for any of the 15 SSRT countries on employment of ethnic minorities and other marginalized groups in tuna fishing.

5.4 Recruitment and contracts

Recruitment and contracting in tropical tuna fishing are assessed using indicators on the use of recruitment agents and contract- and compensation-related regulations and practices.

The use of recruitment agents is a known risk factor for forced labor and human trafficking, with evidence found to reflect this issue in tropical tuna fishing. Limited evidence is found regarding contracts for tuna fishers, but informal recruitment pathways and work arrangements appear to be common. Few SSRT countries appear to implement formal, written contracts in the tuna fishing industry.

The use of recruitment agents or labor brokers is common in South Korea, Taiwan, and Thailand, where forced labor in fishing is notably widespread. Abusive recruitment practices manifest in various ways, including deceptive hiring practices and the use of recruitment fees that lead to debt bondage.[39] There is also some evidence of the use of recruitment agents in the Philippines, with a mix identified of formal, direct recruitment by large fishing companies and informal recruitment by boat owners or captains. Recruitment in Indonesian tuna fisheries is largely informal and often reliant on family ties, though recruitment brokers are used when captains or fishing companies are unable to hire sufficient crew. These brokers have been connected to the extortion of workers. There is no evidence of the use of recruitment agents in tuna fishing in Ghana, the Maldives, or Vietnam, where family ties appear to play a stronger role in arranging employment. No information is found on recruitment in tuna fishing in Senegal, Sri Lanka, or any SSRT country in Latin American and the Caribbean.

Contracts for tuna fishers in Indonesia and Vietnam are largely informal, verbal agreements between employers and workers. In the Philippines, the use of formal work agreements is mixed: workers on purse seine vessels may have signed contracts but are not provided copies, while workers on handline vessels have verbal work agreements. Regulations in Mexico and Thailand require employers to provide fishers with written and signed contracts, with Thailand having steadily increased the proportion of workers who have written contracts. In South Korea, workers are required to sign contracts with the ship-owning company and the recruiting agency but there are indications that migrant workers are not always aware that they have signed the contract or have done so under duress. In general, neither recruitment nor labor contracts address working hours or compensation for overtime for migrant workers in South Korea's DWF. Contracts in Taiwan dictate the length of employment in work contracts. Information on the implementation of contracts and compensation in tuna fishing is unknown for Ecuador, Colombia, Ghana, Panama, Senegal, Sri Lanka, and Venezuela.

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[37] "Tropical Tuna Social Risk Profile: Taiwan"; " Tropical Tuna Social Risk Profile: Republic of Korea".
[38] "Tropical Tuna Social Risk Profile: Republic of Korea".
[39] As cited in "Tropical Tuna Social Risk Profile: Indonesia"; "Tropical Tuna Social Risk Profile: Philippines"; "Tropical Tuna Social Risk Profile: Republic of Korea"; "Tropical Tuna Social Risk Profile: Taiwan"; "Tropical Tuna Social Risk Profile: Thailand".

The prevalence of informal work agreements and the lack of unenforceable written contracts means that there is a higher risk of exploitative compensation and other working conditions. Where formal contracts are used, workers do not always have full comprehension of the content or have access to the agreement after signing. Accordingly, it is reported in Indonesia, the Philippines, South Korea, and Taiwan that fish workers are often disadvantaged when negotiating pay and other terms of work. They are frequently paid below minimum wage and experience arbitrary deductions during payouts. Compensation practices are otherwise unknown, or such evidence is outdated for several countries including Colombia, Ghana, Mexico, Panama, Senegal, Sri Lanka, Thailand, and Venezuela.

Of all SSRT countries assessed, the Maldives appears to have more favorable recruitment, contract, and compensation regulations and practices. While formal, written agreements may not be prevalent, fishing vessels are locally built, owned, and manned without the use of recruitment agents. Payments are divided equally between vessel owners and crew, and fishers also enjoy strong protections from the government regulating the price of catch. Thus, fishing salaries are relatively well-paid compared to other occupations.

5.5 Information gaps and major takeaways

In total, 12 risk indicators are assessed for the tropical tuna fishing industry in each country. Public data specific to indicators in tuna fisheries are scarce; most available information refers broadly to the wider fisheries industry or to other seafood products. Accordingly, the least amount of evidence across the themes assessed in this section concerns workforce characteristics and recruitment and contracts; almost no information can be found on worker characteristics such as migration and ethnicity. In contrast, data on activity at sea in tuna fishing are more readily available, likely because attention has historically been directed more at the environmental management and sustainability of fisheries than to labor issues.

Consistent with the seafood industry indicators, the region with the least available information for tuna fishing indicators is Latin America and the Caribbean, with unknowns recorded for more than 40% of fishing indicators assessed against the SSRT countries in the region. However, data gaps are evident for all regions. Notable information gaps are also recorded for the SSRT countries in Sub-Saharan Africa and South Asia, with fewer data gaps for East Asia and the Pacific.

At the individual country level, the biggest information gaps are for the tuna fishing industries in Colombia, Ecuador, Panama, and Venezuela, with no information found for six of the 12 indicators assessed (see Appendix III and Appendix IV for information on "unknown" fishing indicators by region and country). In contrast, information for nearly all fishing indicators is available for the Maldives, Mexico, the Philippines, South Korea, Taiwan, and Thailand.

The data scarcity around the workforce and the working conditions is testament to the low levels of transparency in seafood supply chains, which constitutes a significant risk factor.

Meanwhile, the available evidence, or the lack thereof, of forced labor, human trafficking, and hazardous child labor relating to tuna fishing points to the need to improve reporting on instances of human rights abuses in fishing to discern whether evidence relates to the fishing industry or to a specific fishery or fisheries (i.e. associated species and gear types). In general, however, using existing evidence as a single predictor of risk is unlikely to be effective due to the significant data gaps and ambiguities. This, therefore, reinforces the need to analyze the underlying drivers of forced labor, human trafficking, and hazardous child labor, through indicators such as those used in the SSRT, to produce a reliable risk assessment.

6 Adjusted risks: processing

The following sections summarize findings for the processing indicators as assessed for tropical tuna that have been grouped into four themes: Evidence of forced labor, human trafficking, and hazardous child labor; Processing characteristics; Workforce characteristics; and Recruitment and contracts. Across all risk profiles, the processing indicators are those for which the least evidence relating to tropical tuna production is found. The processing-level indicators are applied to all 20 SSRT countries.

6.1 Evidence of forced labor, human trafficking, and hazardous child labor in tropical tuna processing

No direct evidence is found of forced labor, human trafficking, or hazardous child labor in the tropical tuna processing industries of any of the 20 risk profiles. However, indicators or potential indicators of forced labor and hazardous child labor are found in Indonesia, Mauritius, the Philippines, and Thailand. The evidence connecting tuna processing to potential human rights abuses in Mauritius and Thailand is limited but is stronger for Indonesia and the Philippines. In Mauritius, there is evidence of some tuna processing workers being charged recruitment fees, which could lead to debt bondage.[40] In Thailand, a lawsuit against a Thai tuna processing factory was found in favor of workers, resulting in a payout of US$1.3 million in 2016 for damages due to labor abuses in the workplace.[41] In Indonesia, tuna processing workers have been recruited with false promises about their contracts, and have experienced long working hours and the denial of leave by some employers.[42] In the Philippines, there is evidence of poor working conditions and indebtedness, as well as anecdotal reports of child labor in the tuna processing factories.[43]

6.2 Processing characteristics

The processing characteristics assessed include the processing stage (primary versus secondary processing), the level of consolidation and vertical integration in the tuna processing industry, and the proportion of tuna processed for domestic consumption versus export.

In contrast to other seafood products such as shrimp, there does not appear to be a clear differentiation in the risks of forced labor, human trafficking, and hazardous child labor between primary and secondary processing, for example, there is no home-based primary processing. More than half of the countries profiled engage in primary and secondary processing of tuna. Panama, Sri Lanka, and Venezuela seem to engage mainly in primary processing, while Ghana, Italy, Portugal, Spain, and Thailand seem to engage mainly in secondary processing, namely tuna canning.

Supply chains where there is a high level of consolidation and vertical integration lend themselves to more transparency and greater oversight. No regional trends are apparent for this indicator. Ecuador, Ghana, the Philippines, and South Korea show high levels of consolidation and some vertical integration within their tuna processing industries. Taiwan also shows a degree of vertical integration between processers and the DWF fleet. France, the Maldives, Senegal, and Thailand show relatively high levels of consolidation but more limited vertical integration. Countries with low levels of consolidation and vertical integration include Indonesia and Vietnam, where there is a greater reliance on intermediaries to buy tuna from the fishing vessels to supply to the processors.

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[40] "Tropical Tuna Social Risk Profile: Mauritius, Fishing and Processing" (Monterey, CA: Monterey Bay Aquarium, 2022).
[41] "Tropical Tuna Social Risk Profile: Thailand".
[42] "Tropical Tuna Social Risk Profile: Indonesia".
[43] "Tropical Tuna Social Risk Profile: Philippines".

No evidence can be found on industry consolidation for Mexico, but there appears to be limited vertical integration. Little to no evidence specific to tuna processing can be found for Colombia, Italy, Mauritius, Panama, Portugal, Spain, Sri Lanka, or Venezuela.

Several SSRT countries import tuna for processing and re-export including France, Italy, Spain, Portugal, Ecuador, Indonesia, and Vietnam, thereby increasing the complexity of the tuna supply chain and introducing a need to consider risks of forced labor, human trafficking, and hazardous child labor in the countries of origin. While the tuna processing industry in most SSRT countries serves both domestic and export markets, tuna processed in Colombia, Ecuador, Ghana, Indonesia, Mauritius, the Philippines, Portugal, Spain, and Vietnam is primarily destined for export. Information on the proportions of processed tuna going to domestic or export markets is not found for Italy, Panama, Senegal, Sri Lanka, Thailand, or Venezuela.

Overall, more vertically integrated supply chains that are oriented toward exports may be subject to more oversight including import controls, verification, and third-party certification. However, exceptions may exist, and the processing characteristics show great variation between the assessed countries.

6.3 Workforce characteristics

Workforce characteristics assessed include the proportions of low-skilled workers, women, migrant workers, ethnic minorities and other marginalized groups, and temporary workers in tuna processing. Further information relating to migrant workers is collected on workers' origins, primary language, GDP per capita of source countries, as well as the legal presence of migrant workers and their ability to change employers. Identified risk factors include a paucity of data on the tuna processing workforce, a high proportion of women who are more vulnerable to exploitation in the workforce, and a high proportion of casualization.

Information specific to workforce characteristics in tuna processing is not found for many countries or only to a limited degree. Where sex-disaggregated data are found for six out of 20 SSRT countries (Ecuador, Ghana, Indonesia, the Maldives, Mauritius, and the Philippines), women represent a significant proportion of the tuna processing workforce, reflecting global statistics on women in seafood processing (FAO, 2022). The available evidence on worker origins for five out of 20 SSRT countries (Ghana, Indonesia, the Maldives, Mauritius, and the Philippines) shows that mostly local and internal migrant workers are employed in tuna processing, except in Mauritius, which appears to employ mostly foreign workers from Bangladesh, India, and Nepal with Hindi as the main spoken language. These migrant workers have low job mobility due to restrictive foreign labor regulations. No information is available on the proportion of minority or Indigenous workers in tuna processing for any of the 20 SSRT countries. Information on the skill level and contract type of workers in tuna processing is only found for two countries – Indonesia and the Philippines – where tuna processing workers include both skilled and low-skilled workers who are mainly employed as temporary or contract workers rather than permanent workers. Indonesia and the Philippines are the only two SSRT countries where evidence for nearly all indicators on workforce characteristics is found.

No information is available on tuna processing workforce characteristics for 11 out of the 20 SSRT countries spanning across Latin America and the Caribbean, Europe and Central Asia, East Asia and the Pacific, and South Asia (Colombia, Italy, South Korea, Mexico, Panama, Portugal, Spain, Sri Lanka, Taiwan, Venezuela, and Vietnam). Limited information on workforce characteristics in tuna processing is available for Ecuador, France, Ghana, the Maldives, Mauritius, Senegal, and Thailand. This paucity of information makes it difficult to determine the risk of forced labor, human trafficking, and hazardous

child labor in tuna processing and is itself therefore a significant risk factor. It highlights the need for improved data collection and reporting on employment in tuna processing (and likely seafood processing generally) to better understand the workforce and its needs.

6.4 Recruitment and contracts

Recruitment and contracts in tropical tuna processing are assessed using indicators on the use of contractors and recruitment agents and on compensation method. There is almost no information for these indicators across all SSRT countries.

The extent to which contractors and recruitment agents are used for employment in tuna processing is unknown in nearly all SSRT countries. Recruitment of tuna processing workers is largely outsourced to brokers and employment agencies in the Philippines, and there is some evidence of recruitment agents being used in Indonesia and Mauritius. Information on compensation in tuna processing is only found for Indonesia where workers are paid a minimum hourly wage or piece rate depending on local laws and contract types.

This lack of data presents a significant concern given the heightened risks associated with recruitment, contract, and compensation issues in other parts of the seafood industry.

6.5 Information gaps and major takeaways

All 20 SSRT countries are assessed against the risk indicators for tropical tuna processing. Like the assessment for tropical tuna fishing, much of the publicly available data found to inform the analysis of these risk indicators refer to the wider seafood processing industry and not specifically to tropical tuna. Evidence specific to tuna processing largely encompasses the processing industry characteristics, with almost no such evidence found on workforce characteristics and recruitment and contracts for most countries. There are substantial information gaps for countries across all regions assessed (see Appendix V and Appendix VI for information on "unknown" processing indicators by region and country). At the individual country level, the biggest information gaps are for the tuna processing industries in Colombia, Italy, Panama, Spain, Sri Lanka, and Venezuela. Notably, there are significant information gaps for the tuna processing industry in Thailand, despite the attention given to human rights abuses in the country's wider seafood industry and its position as the largest tuna processor in the world.[44]

The most information is for Indonesia and the Philippines, followed by Mauritius, the Maldives, and Ghana. Much of the information used to inform the analysis of the tuna processing indicators for Indonesia and the Philippines comes from only one or two key sources, highlighting the importance that individual studies can have in enhancing our knowledge, while also emphasizing the need for more information to develop a reliable picture of the tuna processing industry.

The paucity of information about tuna processing highlights a significant knowledge gap and a need for greater transparency in tuna processing. The data scarcity around the workforce and working conditions in tuna processing is a significant risk factor. It is, all other things being equal, harder to protect vulnerable workers when there is little or no information on who they are or how they are recruited.

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44 As cited in "Tropical Tuna Social Risk Profile: Thailand".

7 Due diligence recommendations

The UN's Guiding Principles for Business and Human Rights state that businesses should have "A human rights due diligence process to identify, prevent, mitigate and account for how they address their impacts on human rights" (United Nations Human Rights Office, 2011). Businesses should implement policies and processes to proactively manage actual and potential adverse human rights impacts throughout their supply chains (OHCHR, 2011).

Each tropical tuna risk profile suggests topics to prioritize for human rights due diligence and related questions for businesses to ask of their supply chains. These suggestions reflect the findings of the individual SSRT tropical tuna profiles including identified risk factors and significant information gaps.

In total, nine priority topics for human rights due diligence are identified across the tropical tuna risk profiles: policies, recruitment, worker demographics, migrant labor, contracts, compensation, worker engagement mechanisms, activity at sea, and processing activities. The following sections briefly describe each due diligence priority area, identify the countries and regions where each priority is recommended, and highlight sample questions prepared for businesses and suppliers.[45]

7.1 Policies

This topic refers to corporate policies, management systems, and public commitments by business to combating forced labor, human trafficking, and hazardous child labor in their supply chains. This includes policies governing the business and relationships with suppliers and oversight bodies, with a focus on adaptive processes to embed responsible practices into core operations, culture, and strategy.[46]

Policies are identified as a priority topic for due diligence by the Portugal and Spain tropical tuna risk profiles. These two countries represent the first and fourth largest canned seafood processing industries in the EU, respectively, and import large volumes of frozen tuna for processing from producer countries at risk of forced labor, human trafficking, and hazardous child labor.[47] The significance of the tuna processing industries in these countries means that corporations may exercise considerable influence over supply chain operations.

Sample questions for this due diligence priority include the following:

1. Does the company have corporate policies addressing forced labor, human trafficking, and hazardous child labor?
2. What strategies or objectives been developed to incentivize buying practices that reduce the prevalence of forced labor, human trafficking, and hazardous child labor?
3. Is the prohibition of forced labor, human trafficking, and hazardous child labor written into contracts with suppliers?

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[45] Refer to individual risk profiles for the complete and custom list of recommended due diligence priorities and questions for that country. Appendix VII shows the distribution of due diligence priorities across SSRT country profiles and regions.

[46] "OECD Due Diligence Guidance for Responsible Business Conduct" (OECD, May 31, 2018), https://www.oecd.org/investment/due-diligence-guidance-for-responsible-business-conduct.htm.

[47] As cited in "Tropical Tuna Social Risk Profile: Spain, Fishing and Processing" (Monterey, CA: Monterey Bay Aquarium, 2022); "Tropical Tuna Social Risk Profile: Portugal, Fishing and Processing" (Monterey, CA: Monterey Bay Aquarium, 2022).

7.2 Recruitment

This topic refers to the recruitment processes used to hire workers. Elements of unfair recruitment can include deception, where the worker is deliberately misled; coercion, where the worker faces threats of penalty and does not voluntarily agree to work; abuse, where a worker's vulnerabilities regarding family, education, or legal status are exploited; discrimination, where equality of opportunity is impaired for workers; and corruption, where recruiters act dishonestly for personal gain (ILO, 2022a).

The recruitment process is a notable driver of risk in the seafood industry including in tuna fishing and processing. Recruitment is identified as a priority topic for due diligence by the Indonesia, South Korea, Taiwan, Thailand, Italy, Spain, Mauritius, and Senegal tropical tuna risk profiles. This area of due diligence refers to recruitment practices for tuna fishing and processing workers and relates to recruitment practices in the production country and the country of origin for migrant workers.

There is no information on recruitment practices in tuna processing in Italy and Spain, despite being the two largest tuna processors in the EU,[48] nor for Senegal. In Indonesia, South Korea, Taiwan, Thailand, and Mauritius, the use of recruitment agents in the seafood industry has been connected to issues such as deceptive recruitment, coercion, the retention of identity documents, and the use of recruitment fees.

Sample questions for this due diligence priority include the following:

1. Are workers hired directly and/or through recruitment agents?
2. 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?
3. What procedures are in place to ensure workers have unrestricted access to their documents (such as identity or immigration documents and work agreements)?

7.3 Worker demographics

This area of due diligence refers to worker characteristics that help identify workers that are more vulnerable to labor exploitation, including gender, ethnicity, and migration status, among others. Identifying the characteristics of the tuna supply chain workforce can provide insight into risks of forced labor, human trafficking, and hazardous child labor.

Worker demographics is identified as a priority topic for due diligence in all regions and almost all countries assessed, due to the significant lack of information on the tuna fishing and processing workforces found by most tropical tuna risk profiles.

Sample questions for this due diligence priority include the following:

1. What is the proportion of temporary and contract workers to permanent workers?
2. What is the proportion of women in the workforce? Are women in managerial roles?
3. What is the proportion of young workers (15–18 years old) in the workforce?

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[48] As cited in "Tropical Tuna Social Risk Profile: Spain"; "Tropical Tuna Social Risk Profile: Italy, Fishing and Processing" (Monterey, CA: Monterey Bay Aquarium, 2022).

7.4 Migrant labor

This due diligence priority refers to the employment of domestic or foreign migrant workers who migrate from their usual place of residence, either temporarily or permanently, for work. Migrant workers are especially known to be more vulnerable to forced labor and human trafficking due to factors such as poor governance, restrictions on the rights of migrant workers, and unethical recruitment (IOM et al., 2022).

Migrant labor is identified as a priority topic for due diligence in Ecuador, Italy, Mauritius, Mexico, Panama, Thailand, Venezuela, and Vietnam. Migrant workers are known to be employed in tuna processing in Mauritius, while Ecuador, Italy, and Thailand are host to vulnerable populations of refugees and foreign migrant workers. There is limited to no information on the presence of migrant labor in the tuna fishing or processing industries of Mexico, Panama, Venezuela, and Vietnam.

Sample questions for this due diligence priority include the following:

1. Does the fishery employ mostly migrant laborers? What countries or parts of the country do the workers come from?
2. If employing migrant workers, what language(s) do they speak? Is the information on worker rights, grievance mechanisms, and health and safety displayed in languages that all workers can understand?
3. To what extent are migrant workers able to legally change jobs or employers?

7.5 Contracts

This due diligence area refers to the nature of work agreements determining the parameters and scope of work in the tuna industry. Formal written work contracts are promoted by the Work in Fishing Convention, 2007 (No. 188), which states that Member countries should adopt laws and regulations requiring that fishers have the protection of a work agreement and specifies the minimum terms to be included, among other requirements of the convention on work agreements.[49]

Contracts are identified as a priority topic for due diligence in Ghana, Indonesia, the Philippines, Senegal, South Korea, Spain, Sri Lanka, and Thailand, where evidence is limited or suggests the implementation of work agreements for tuna workers is inconsistent or nonexistent, and in some cases vulnerable to abuse.

Sample questions for this due diligence priority include the following:

1. Does the worker have a written contract?
2. Are contracts written in a language that workers understand?
3. Do contracts include clauses that define rest periods, wages, and compensation for overtime?

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[49] "Convention C188 - Work in Fishing Convention, 2007 (No. 188)" (2007), https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO: :P12100_ILO_CODE:C188.

7.6 Compensation

This due diligence area refers to the methods through which tuna fishing and processing workers are paid for their labor. Two main payment systems are used in fishing: fishers are typically paid either a flat wage, i.e. a fixed salary per pay period, or a share of the catch, where compensation is based on a share of the profits from a fishing trip, with some fishers paid a low fixed wage which is topped up by a share of the catch profits (ILO, 2022b). In processing, compensation methods may include a flat wage or piece-rate payment system, where workers are paid based upon the amount of work completed (ILO, 2023b). Human rights and labor abuses in the seafood industry can include payment below the minimum wage, the withholding or nonpayment of wages, and excessive wage deductions.

Compensation is identified as a priority topic for due diligence in Ghana, Indonesia, Italy, the Maldives, South Korea, Spain, Sri Lanka, Thailand, and Vietnam. There is little to no information for Ghana, Italy, Spain, Sri Lanka, and the Maldives on compensation practices in their tuna industries. In contrast, compensation practices in Indonesia, South Korea, Thailand, and Vietnam have been tied to issues such as wage deductions and the withholding of wages.[50]

Sample questions for this due diligence priority include the following:

1. What payment structure is used to compensate fish workers (e.g. piece rate, fixed monthly salary, or catch share)?
2. Do fish workers receive advance payments or loans?
3. Do you know if workers in your supply chain are paid at least the minimum wage in their country of employment?

7.7 Worker engagement mechanisms

This area of due diligence refers to the pathways available for workers to engage their employers on labor issues with their employers through mechanisms such as third-party monitoring, trade unions organizing, or reporting grievances that will be evaluated, investigated, and acted upon to achieve remedy.

Worker engagement mechanisms are identified as a priority topic for due diligence in almost all SSRT countries, particularly those in East Asia and the Pacific and Latin America and the Caribbean: Colombia, Ecuador, Ghana, Indonesia, the Maldives, Mexico, Panama, the Philippines, Portugal, Senegal, South Korea, Taiwan, Thailand, Venezuela, and Vietnam. Freedom of association and collective bargaining is restricted in some countries, preventing all workers from organizing effectively, while other barriers may further affect the ability of seafood workers to organize such as limited time at shore for fishers. Legal constraints on organizing, anti-union discrimination, and intimidation such as dismissal and violence are significant issues hindering effective worker engagement mechanisms in these countries. Meanwhile, publicly available data on seafood workers' access to functional grievance mechanisms are very limited.

Businesses should ensure that other engagement mechanisms are available to workers. Effective grievance mechanisms are those that establish trust with affected workers by maintaining their anonymity and preventing retaliatory action (United Nations Human Rights Office, 2011).

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[50] As cited in "Tropical Tuna Social Risk Profile: Thailand"; "Tropical Tuna Social Risk Profile: Indonesia"; "Tropical Tuna Social Risk Profile: Vietnam".

Sample questions for this due diligence priority include the following:

1. What are the factors influencing fish workers' participation, or lack thereof, in trade unions?
2. Do workers in your operation/supply chain have access to third-party monitors such as trade union representatives or onboard observers?
3. Are there procedures to document, track, and resolve workplace grievances and complaints?

7.8 Activity at sea

This area of due diligence refers to the characteristics of tropical tuna fishing that pose higher risks of forced labor, human trafficking, and hazardous child labor including time at sea, transshipment, and the correlated risk of IUU fishing.

Activity at sea is identified as a priority topic for due diligence in Ecuador, Mauritius, Mexico, Panama, the Philippines, Senegal, and Sri Lanka. Risks in these countries include IUU fishing in the wider seafood industry or directly linked to tuna fishing, transshipment of tuna, and FOCs.[51]

Sample questions for this due diligence priority include the following:

1. How long do tuna fishers typically stay at sea?
2. Do tuna vessels engage in transshipment at sea?
3. Are vessels flagged in the country where the vessel is owned?

7.9 Processing activities

This due diligence priority focuses on traceability and oversight of raw material supplying tropical tuna processing, with reference to factors such as consolidation and vertical integration of tuna supply chains, and the origin of tuna raw materials.

Processing activities are identified as a priority topic for due diligence in all regions, specifically in Colombia, Ecuador, France, Ghana, Italy, the Maldives, Mauritius, Mexico, Portugal, Senegal, Spain, Thailand, Venezuela, and Vietnam. Limited information is available on the tuna processing industries in these countries. In addition, some countries such as Ecuador and Thailand, are significant importers of tuna from other countries for processing and re-export.

Sample questions for this due diligence priority include the following:

1. Do you know where processing companies are sourcing their tuna inputs?
2. Does the processing company own or control its suppliers?
3. Is there traceability back to the vessel, and do you know what working conditions are like on the vessel?

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[51] As cited in "Tropical Tuna Social Risk Profile: Ecuador, Fishing and Processing" (Monterey, CA: Monterey Bay Aquarium, 2022); "Tropical Tuna Social Risk Profile: Mexico, Fishing and Processing" (Monterey, CA: Monterey Bay Aquarium, 2022); "Tropical Tuna Social Risk Profile: Panama, Fishing and Processing" (Monterey, CA: Monterey Bay Aquarium, 2022); " Tropical Tuna Social Risk Profile: Philippines"; "Tropical Tuna Social Risk Profile: Mauritius".

7.10 Information gaps and major takeaways

Due diligence priorities are recommended for countries based on two factors: the availability of information and identified risk factors. In total, nine priority topics for human rights due diligence are identified across the tropical tuna risk profiles: policies, recruitment, worker demographics, migrant labor, contracts, compensation, worker engagement mechanisms, activity at sea, and processing activities.

Three due diligence priority topics are of importance across nearly all SSRT countries and regions: *worker demographics*, *worker engagement mechanisms*, and *processing activities (traceability and oversight of raw material supply)*.

Information gaps are a concern across the three due diligence priority topics:

- A paucity of information on worker demographics, such as gender, ethnicity, and migration status, which can provide insight into the vulnerability of tuna fishing and processing workers to exploitation, restricts the ability of stakeholders to assess human rights risks in tropical tuna supply chains.
- Limited information on worker engagement mechanisms and barriers to accessing them are a significant concern within the seafood industry of many countries. Low levels of worker organization, limited access to effective grievance mechanisms, and a lack of access to workplaces for third-party monitors seem to be significant risk factors for labor rights and human rights concerns in the seafood industries of tropical tuna producing countries, with few exceptions.
- There are also significant knowledge gaps regarding tuna processing, with available evidence indicating limited traceability and oversight of raw material supplying tropical tuna processing.

In addition to the three due diligence priority topics noted above, other due diligence priority topics noted to be of importance by region (those most frequently recommended across the SSRT countries within the region) are *recruitment*, *contracts*, and *compensation* for East Asia and the Pacific, *compensation* for South Asia, and *activity at sea*, *recruitment*, and *contracts* for Sub-Saharan Africa. Further information regarding the human rights due diligence recommendations can be found in individual risk profiles.

8 Conclusion

The risks of forced labor, human trafficking, and hazardous child labor in tropical tuna fishing and processing are driven by complex interactions between the national context and factors specific to the seafood industry and to tropical tuna fishing and processing.

Significant base (country-level) risks are higher rates of immigration or internal migration and poor acceptance of migrants; barriers to workers organizing; and poor enforcement of legislation for human trafficking, forced labor, and hazardous child labor, often caused by a lack of capacity, corruption, and official complicity within the relevant authorities. These risks are reflected within the seafood industry as limited capacity for implementation and enforcement of seafood industry-specific governance and limited evidence of access to grievance mechanisms for seafood workers. While the presence of voluntary schemes and multistakeholder initiatives in the seafood industry may contribute to lowering risks, they are not a substitute for good governance. Where possible, businesses may use their collective leverage to advocate for better governance through the implementation and enforcement of better regulatory frameworks. For example, the strengthening of laws and regulations affecting worker voice and organization, and the ratification and implementation of ILO Work in Fishing Convention, No. 188.

Multiple factors increase the adjusted risks within the tropical tuna fishing industry. Although IUU fishing is a recurring risk factor, efforts to address IUU fishing alone are not associated with a reduction in risks of forced labor and human trafficking in tropical tuna fishing. Meanwhile, extended periods at sea and the use of transshipment increase the difficulty of monitoring and enforcing labor rights on tuna fishing vessels and addressing these factors might be a more effective strategy. There is a high reliance on migrant labor and the use of recruitment agents in countries where actual human rights abuses have been found in tuna fishing. Implementing more transparency regarding the tuna fishing workforce, recruitment and work arrangements, and supporting worker engagement mechanisms may help to reduce risks in tropical tuna fishing.

The main risk factor identified in tuna processing is the paucity of information about the sector. In particular, very little information is available on workers, recruitment, and contracts. While there is no evidence of forced labor, human trafficking, or hazardous child labor in the tropical tuna processing industries of any of the 20 countries assessed, evidence of forced labor and (hazardous) child labor in the seafood processing industry of some of the SSRT countries and the lack of transparency around the tuna processing industry may mean that cases of human rights abuses have not been publicly reported or that insufficient attention has been given to the industry to identify abuses. The importation of tuna for processing from other countries can further reduce visibility and oversight in supply chains. Therefore, implementing more transparency regarding the tuna processing workforce, recruitment, and work arrangements and establishing traceability systems may help businesses to better understand and mitigate the risks of human rights abuses and establish greater oversight In tropical tuna processing.

Based upon the findings discussed above, the main human rights due diligence recommendations to businesses engaging with tropical tuna supply chains follow:

- **Know the workers** – gather information in supply chains to identify vulnerable or precarious workers, recruitment pathways, and working conditions.
- **Support worker engagement** – identify or establish mechanisms for worker engagement, such as grievance mechanisms, and actively support worker organization, including advocacy where there are national barriers to organizing.
- **Establish traceability systems** – implement interoperable traceability systems for information sharing among supply chain actors to track the product and associated data through the supply chain, starting from the fishing vessel. Data can be used to improve supply chain visibility and inform a business' understanding of supply chain risks, but traceability is not sufficient to address human rights risks alone and should be carried out in conjunction with the recommendations above.

Together, these actions can help businesses to better understand, prevent, and mitigate risks to workers, provide pathways for remediation of worker grievances, and establish greater transparency and supply chain oversight.

Appendices

APPENDIX I: SEAFOOD INDUSTRY INDICATORS ASSESSED AS "UNKNOWN" BY REGION AND COUNTRY

Seafood industry indicator	Region	Country
Enforcement and implementation of industry-specific regulations and policies	Europe & Central Asia	Portugal
	Latin America & the Caribbean	Colombia Panama Venezuela
	South Asia	Maldives
	Sub-Saharan Africa	Mauritius
Access to workplaces for third-party monitors	East Asia & the Pacific	Vietnam
	Europe & Central Asia	Italy Portugal
	Sub-Saharan Africa	Mauritius
Access to a functional grievance mechanism	East Asia & the Pacific	Vietnam
	Europe & Central Asia	France Italy Portugal Spain
	Latin America & the Caribbean	Colombia Ecuador Mexico Panama Venezuela
	South Asia	Maldives Sri Lanka
	Sub-Saharan Africa	Ghana Mauritius
Participation in voluntary schemes and implementation of corporate policies and strategies to combat forced labor, human trafficking, and hazardous child labor	Europe & Central Asia	Italy Portugal
	Latin America & the Caribbean	Colombia Venezuela

APPENDIX II: NUMBER OF SEAFOOD INDUSTRY INDICATORS ASSESSED AS "UNKNOWN" BY REGION AND COUNTRY (OUT OF EIGHT TOTAL)

Region	Country	Number of unknown seafood industry indicators
East Asia & the Pacific	Vietnam	2
Europe & Central Asia	Portugal	4
	Italy	3
	France	1
	Spain	1
Latin America & the Caribbean	Venezuela	3
	Colombia	3
	Panama	2
	Ecuador	1
	Mexico	1
South Asia	Maldives	2
	Sri Lanka	1
Sub-Saharan Africa	Mauritius	3
	Ghana	1
	Senegal	1

APPENDIX III: FISHING INDUSTRY INDICATORS ASSESSED AS "UNKNOWN" BY REGION AND COUNTRY

Fishing indicator	Fishing sub-indicator	Region	Country
Workforce characteristics	A substantial proportion of fishers are migrant workers	Latin America & the Caribbean	Colombia Ecuador Panama
		East Asia & the Pacific	Vietnam Thailand
		South Asia	Sri Lanka
	A high proportion of fishers from ethnic minority and other marginalized groups	Latin America & the Caribbean	Colombia Ecuador Mexico Panama Venezuela
		East Asia & Pacific	Indonesia Philippines South Korea Taiwan Thailand Vietnam

Fishing indicator	Fishing sub-indicator	Region	Country
Workforce characteristics	A high proportion of fishers from ethnic minority and other marginalized groups	South Asia	Maldives Sri Lanka
		Sub-Saharan Africa	Ghana Senegal
Activity at sea	30 or more days at sea	Latin America & the Caribbean	Colombia Ecuador Panama Venezuela
		East Asia & the Pacific	Indonesia Thailand
	AIS dark spots to conceal criminal activities	Latin America & the Caribbean	Colombia Ecuador Panama Venezuela
		East Asia & the Pacific	Thailand South Korea
		Sub-Saharan Africa	Ghana
	Suspect or illegal flagging practices	Sub-Saharan Africa	Ghana
Recruitment and contracts	Contract- and compensation-related regulations and practices	Latin America & the Caribbean	Colombia Panama Venezuela
		Sub-Saharan Africa	Ghana Senegal
		South Asia	Sri Lanka
	Widespread use of recruitment agents	Latin America & the Caribbean	Colombia Ecuador Mexico Panama Venezuela
		Sub-Saharan Africa	Senegal
		South Asia	Sri Lanka

APPENDIX IV: NUMBER OF FISHING INDUSTRY INDICATORS ASSESSED AS "UNKNOWN" BY REGION AND COUNTRY (OUT OF 12 TOTAL)

Region	Country	Number of unknown fishing industry indicators
Latin America & the Caribbean	Panama	6
	Colombia	6
	Venezuela	5
	Ecuador	5
	Mexico	2
East Asia & the Pacific	Thailand	4
	Vietnam	2
	Indonesia	2
	South Korea	2
	Taiwan	1
	Philippines	1
Sub-Saharan Africa	Ghana	4
	Senegal	3
South Asia	Sri Lanka	4
	Maldives	1

APPENDIX V: PROCESSING INDUSTRY INDICATORS ASSESSED AS "UNKNOWN" BY REGION AND COUNTRY

Processing indicator	Processing sub-indicator	Region	Country
Processing characteristics	Consolidation and vertical integration	Europe & Central Asia	Italy
			Portugal
			Spain
		Latin America & the Caribbean	Colombia
			Panama
			Venezuela
		South Asia	Sri Lanka
		Sub-Saharan Africa	Mauritius
	Domestic versus export	East Asia & the Pacific	Thailand
		Europe & Central Asia	Italy
		Latin America & the Caribbean	Panama
			Venezuela
		South Asia	Sri Lanka
		Sub-Saharan Africa	Senegal

Processing indicator	Processing sub-indicator	Region	Country
Workforce characteristics	GDP per capita of processing country and main migrant worker source country	East Asia & the Pacific	South Korea Taiwan Vietnam
		Europe & Central Asia	France Italy Portugal Spain
		Latin America & the Caribbean	Colombia Ecuador Mexico Panama Venezuela
		South Asia	Maldives Sri Lanka
		Sub-Saharan Africa	Ghana Senegal
	Legal presence (regularity) of migrant workers	East Asia & the Pacific	South Korea Taiwan Thailand Vietnam
		Europe & Central Asia	France Italy Portugal Spain
		Latin America & the Caribbean	Colombia Ecuador Mexico Panama Venezuela
		South Asia	Maldives Sri Lanka
		Sub-Saharan Africa	Ghana Mauritius Senegal

Processing indicator	Processing sub-indicator	Region	Country
Workforce characteristics	Migrant worker language (vs. dominant language in the industry)	East Asia & the Pacific	Indonesia South Korea Taiwan Vietnam
		Europe & Central Asia	France Italy Portugal Spain
		Latin America & the Caribbean	Colombia Ecuador Mexico Panama Venezuela
		South Asia	Maldives Sri Lanka
		Sub-Saharan Africa	Ghana Senegal
	Skilled versus low-skilled	East Asia & the Pacific	South Korea Taiwan Thailand Vietnam
		Europe & Central Asia	France Italy Portugal Spain
		Latin America & the Caribbean	Colombia Ecuador Mexico Panama Venezuela
		South Asia	Maldives Sri Lanka
		Sub-Saharan Africa	Ghana Mauritius Senegal

Processing indicator	Processing sub-indicator	Region	Country
Workforce characteristics	The ability of migrant workers to change jobs	East Asia & the Pacific	South Korea Taiwan Vietnam
		Europe & Central Asia	Italy Portugal Spain
		Latin America & the Caribbean	Colombia Ecuador Mexico Panama Venezuela
		South Asia	Maldives Sri Lanka
		Sub-Saharan Africa	Senegal
	The proportion of migrant versus local workers	East Asia & the Pacific	South Korea Taiwan Thailand Vietnam
		Europe & Central Asia	France Italy Portugal Spain
		Latin America & the Caribbean	Colombia Ecuador Mexico Panama Venezuela
		South Asia	Sri Lanka
		Sub-Saharan Africa	Senegal
	The proportion of minority or Indigenous workers	East Asia & the Pacific	Indonesia Philippines South Korea Taiwan Thailand Vietnam
		Europe & Central Asia	France Italy Portugal Spain

Processing indicator	Processing sub-indicator	Region	Country
Workforce characteristics	The proportion of minority or Indigenous workers	Latin America & the Caribbean	Colombia
			Ecuador
			Mexico
			Panama
			Venezuela
		South Asia	Maldives
			Sri Lanka
		Sub-Saharan Africa	Ghana
			Mauritius
			Senegal
	The proportion of temporary and contract versus permanent workers	East Asia & the Pacific	South Korea
			Taiwan
			Thailand
			Vietnam
		Europe & Central Asia	France
			Italy
			Portugal
			Spain
		Latin America & the Caribbean	Colombia
			Ecuador
			Mexico
			Panama
			Venezuela
		South Asia	Maldives
			Sri Lanka
		Sub-Saharan Africa	Ghana
			Mauritius
			Senegal
Workforce characteristics	The proportion of women in the workforce	East Asia & the Pacific	South Korea
			Taiwan
			Thailand
			Vietnam
		Europe & Central Asia	France
			Italy
			Portugal
			Spain
		Latin America & the Caribbean	Colombia
			Mexico
			Panama
			Venezuela
		South Asia	Sri Lanka

Processing indicator	Processing sub-indicator	Region	Country
Workforce characteristics	Workers' origins	East Asia & the Pacific	South Korea Taiwan Thailand Vietnam
		Europe & Central Asia	France Italy Portugal Spain
		Latin America & the Caribbean	Colombia Ecuador Mexico Panama Venezuela
		South Asia	Sri Lanka
		Sub-Saharan Africa	Ghana Senegal
Recruitment and contracts	Compensation method	East Asia & the Pacific	Philippines South Korea Taiwan Thailand Vietnam
		Europe & Central Asia	France Italy Portugal Spain
		Latin America & the Caribbean	Colombia Ecuador Mexico Panama Venezuela
		South Asia	Maldives Sri Lanka
		Sub-Saharan Africa	Ghana Mauritius Senegal

Processing indicator	Processing sub-indicator	Region	Country
Recruitment and contracts	Widespread use of contractors and recruitment agents	East Asia & the Pacific	South Korea
			Taiwan
			Thailand
			Vietnam
		Europe & Central Asia	France
			Italy
			Portugal
			Spain
		Latin America & the Caribbean	Colombia
			Ecuador
			Mexico
			Panama
			Venezuela
		South Asia	Maldives
			Sri Lanka
		Sub-Saharan Africa	Ghana
			Senegal

APPENDIX VI: NUMBER OF PROCESSING INDUSTRY INDICATORS ASSESSED AS "UNKNOWN" BY REGION AND COUNTRY (OUT OF 17 TOTAL)

Region	Country	Number of unknown processing industry indicators
Latin America & the Caribbean	Venezuela	14
	Panama	14
	Colombia	13
	Mexico	12
	Ecuador	11
Europe & Central Asia	Italy	14
	Portugal	13
	Spain	13
	France	11
East Asia & the Pacific	Vietnam	12
	Taiwan	12
	Thailand	10
	Philippines	2
	Indonesia	2
	South Korea	12
Sub-Saharan Africa	Senegal	12
	Ghana	9
	Mauritius	6
South Asia	Sri Lanka	14
	Maldives	9

Country	Policies	Recruitment	Worker demographics	Migrant labor	Contracts	Compensation	Worker engagement mechanisms	Activity at sea	Processing activities
Indonesia		x			x	x	x		
Philippines			x		x		x	x	
South Korea		x	x		x	x	x		
Taiwan		x	x				x		
Thailand		x		x	x	x	x		x
Vietnam			x	x		x	x		x
France			x						x
Italy		x	x	x		x			x
Portugal	x		x				x		x
Spain	x	x	x		x	x			x
Colombia			x				x		x
Ecuador			x	x			x	x	x
Mexico			x	x			x	x	x
Panama			x	x			x	x	
Venezuela			x	x			x		x
Maldives			x			x	x		x
Sri Lanka			x		x	x		x	
Ghana			x		x	x	x		x
Mauritius		x		x				x	x
Senegal		x	x		x		x	x	x
TOTAL	2	8	17	8	8	9	15	7	14

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