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**An assessment of ethical issues impacting
on the UK seafood supply chain:
Strategic Report**

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ASSESSMENT OF ETHICAL ISSUES IMPACTING ON THE UK SEAFOOD SUPPLY CHAIN

Analytical and Strategic Report

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EXECUTIVE SUMMARY

This is the overview report of a consultancy project undertaken for Seafish, on ethical issues as they impact on UK seafood supply chains. It should be read together, with other outputs of the project, (a) an initial literature review undertaken during the first month, and (b) profiles prepared on 15 countries as a contribution to risk assessment for companies importing seafood from these countries.

This report aims to provide the context for the study; to identify patterns of risk by country, and to some extent by species; to capture some points echoed by representatives of the UK seafood industry and other key stakeholders during the course of the project; to learn some lessons from the recent experience in Thailand, where much of the media attention on labour abuse in seafood supply chains has been focused, and where there has been a significant response by seafood companies engaged in different partnerships to address the problems; and also to formulate some recommendations for follow-up action.

This report has been prepared at a critical time, for a number of reasons:

- There is a rising global concern with patterns of labour exploitation in the seafood industry.
- After two decades of experience with the environmental dimensions of seafood sustainability, attention is turning ever more to the social dimensions. Consumers are not only worried about fish and the oceans, they want to be sure that the seafood products they consume are not tainted by slavery-like practices on vessels and in processing plants.
- New UK legislation, the Modern Slavery Act, now requires companies to report on their measures to prevent and eradicate slavery and human trafficking in their supply chains.
- Seafish itself is becoming ever more active on ethical concerns in seafood. The Corporate Plan 2015-2018, guided by its industry Panels, stressed the requirement to address all elements of responsible sourcing, both ethical and environmental, across all areas of the supply chain.

This report seeks a better understanding of these ethical concerns, to prepare the ground for future action.

As the report emphasises, there are severe problems of labour abuse in seafood production, particularly but not only at sea, and above all in distant water fishing. Most at risk are the migrant workers from the poorer Asian countries, often recruited through unscrupulous labour brokers, and employed without contracts or employment and without effective remedies in cases of abuse.

While the worst abuses have been documented by the media, there has been very limited systematic research beyond those countries most in the spotlight. If real progress is to be made, more systematic research is needed, together with more transparency regarding the origin of seafood products.

The report and its accompanying country profiles also document some initiatives taken by seafood companies, often together with non-governmental organisations (NGOs), to seek remedies once problems are detected in their supply chains. Though the initiatives are generally quite recent, and it may be too early to judge the full impact, there are potential lessons for longer term action by the seafood

industry in at-risk countries, blending ground-level action with pressure for effective policies, monitoring and law enforcement by government agencies.

Finally, the report makes ten specific recommendations for follow-up action. Some of these are general recommendations, some are directed specifically at the seafood industry, and some are made to Seafish itself.

A key recommendation for the seafood industry is that, while NGO certification and labelling initiatives are progressively moving from the environmental to the social dimensions, the time is ripe for the seafood industry to take a lead in preparing a voluntary code of conduct on the social dimensions. There are precedents in other industrial sectors, such as electronics and cocoa, in both of which companies have been subjected to widespread allegations of slavery-like practices in their supply chains. A voluntary code can be adapted to the specific circumstances of the seafood industry, and can also include voluntary monitoring mechanisms. The report also suggests that social audit information can be shared by companies.

The final recommendations are addressed to Seafish itself. The Seafood Ethics Common Language Group (SECLG) has been greatly welcomed by the seafood industry, as have efforts to amend the Responsible Fishing Scheme (RFS) and the development of the Risk Assessment for Sourcing Seafood (RASS), which is now embracing social dimensions, and also seeking more global coverage. The report observes that there is a significant opportunity for Seafish to become more active on these concerns, sharing information, and profiling initiatives undertaken by UK seafood companies in collaboration with other partners. But this will require the allocation of sufficient resources to different dimensions of Seafish work on ethics.

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1. AIMS OF THE REPORT, METHODOLOGY AND PRESENTATION OF FINDINGS

Overall aims of report

The overall aim of this report is to present a detailed review of ethical issues impacting on UK supply chains, including domestic landings and imports.

The subject is vast, and of critical importance today. Companies are under growing pressure from advocacy groups and consumers to undertake voluntary measures to address ethical concerns in their operational activities and supply chains. In the UK, an important piece of new legislation was enacted by Parliament at precisely the time that this project got under way. This is the *Modern Slavery Act*, which was adopted by the UK Parliament in late March 2015, and entered into force in August 2015. This has provisions on both supply chain management and maritime enforcement. This places legal obligations on companies above a certain size, to prevent and eradicate forced labour and human trafficking in their supply chains¹.

With the growing movement to promote sustainability, responsibility, and human and labour rights in business activities, the seafood industry has very often been in the spotlight. Seafish itself decided to create a Seafood Ethics Common Language Group, shortly after UK media articles had documented serious labour violations in seafood production in Thailand, and had named specific UK retailers as allegedly tainted by slavery-like practices in their Thai supply chains.

Since mid 2014 there has been a major focus on ethical and human rights issues in one country, Thailand. In this country the allegations of severe labour abuse have been particularly serious, notably against Burmese, Cambodian and other migrant workers on vessels at sea. Moreover, Thailand has a large fishing fleet, and is an exporter of canned and processed seafood to the UK.

However, while much of the recent evidence of serious labour abuse does relate to Thailand and Thai vessels, the intention of this report is to go beyond this one country.

1. One aim is to identify both the countries and regions where the risk of abuse is potentially serious, as well as document the recruitment and employment practices in different parts of the seafood industry which may lend themselves to such abuse. In this sense, the report, in conjunction with the accompanying literature review and country profiles, comprises a risk mapping exercise. It seeks to uncover the basic facts of serious labour abuses, and also to analyse the reasons why they are occurring.

2. A second aim is to document and assess what is being done, in particular by the seafood industry, to prevent and remedy the problems. There is now growing acceptance that companies must exercise due diligence, to address human rights issues in their supply chains. But what exactly is entailed by the concept of “due diligence”? How far do the responsibilities of an individual company extend? And when abusive practices are detected in a company’s supply chain, should it

¹ Following a public consultation held in 2015, the UK Government announced that as of October 2015 all commercial organisations carrying on business in the UK with a total turnover of £36 million or more will have to prepare a statement on slavery and human trafficking each financial year. Statutory guidance from the Government will indicate what needs to be included in the statement.

immediately disengage from a supplier, or should it rather assist the supplier to improve the practice? Many companies are now moving away from a “cut-and-run” approach.

3. In the seafood industry, supply chains at land and sea are often complex, with multiple layers of activity. A key aim of this project has been to engage with key industry contacts, to try to understand their own perspective on these concerns. What risk assessment have they undertaken when sourcing seafood products from overseas suppliers? What action have they taken when problems have been detected either alone or in partnership with others?

4. A further aim has been to identify and assess the benchmarks for ethical practice in the seafood industry. Seafood has long been an area of focus for environmental groups concerned with marine conservation. There has been a lengthy experience with environmental codes and labelling, and responsible sourcing. Very recently, there has been a shift towards including social concerns within overall codes for the fishing, aquaculture or marine ingredients industries. However, despite the growing interest in the subject, progress towards having a generic code of conduct to address social and labour concerns in the seafood industry appears still to be at an early stage. Later stages of this report discuss how such a gap could best be filled.

5. A final aim has been to present the information in a way that is useful to the seafood industry and its various stakeholders. This is not an exercise in investigative journalism, though it has involved a fair amount of fact finding on hidden situations of abuse. Nor is it an academic exercise, though complex issues (particularly structural changes in the seafood industry as they relate to potential abuse of workers) have required a certain amount of analysis. Altogether, the report seeks to present the facts of abuse in a balanced way, to assess the industry response, and to provoke thought for future action.

Methodology

The contract was carried out over a period of approximately five months between early March and early August 2015. As indicated in the tender document, it was essentially a desk – based piece of work, though an eight day visit to Thailand was made between 10th and 18th June 2015.

The first stage was to prepare a literature review, published together with this report. This addresses; the context and challenges; the scope of analysis, in applying ethical concepts and standards to the seafood industry; a review of relevant published reports; a review of media reports, websites and advocacy campaigns; an initial assessment of government, industry and multi-stakeholder initiatives; and an overall assessment and gap analysis.

The next stage of the project was spent in filling information gaps, mainly through telephone or skype interviews with key informants in a wide number of countries; and consulting as widely as possible with company representatives and other key stakeholders in the UK seafood industry. The consultations sought to cover the spectrum, from the main UK retailers through to the larger and smaller size suppliers, processors and seafood specialists, in particular those that have been active in the Seafish Seafood Ethics Common Language Group. Though the consultations were deliberately left quite open-ended, a briefing document was prepared with some specific questions to guide the discussions (the specific questions can be found in Annex 1 at the end of the report).

The main purpose of the visit to Thailand between 10-18 June was to review the experience of the many different partnerships (within the seafood industry, between the industry and government, and also partnerships involving international organisations and NGOs), that have been formed in order to seek remedies and responses to the reported cases of human rights abuse in the Thai seafood industry. The findings of this country visit are included in Chapter 4 of this report, on responses and remedies.

A presentation of the interim result of this report was made to the Seafood Ethics Common Language Group on 13 July 2015. Every effort has been made to incorporate the comments and views expressed at this meeting in this final report.

Presentation of findings

The main findings are presented in a final report which has been divided into three parts:

This part, PART A, comprises an analytical report, leading to strategic recommendations for follow-up. It comprises:

- a discussion of the issues and challenges in applying ethical concepts, particularly those set out in international standards on human and labour rights, to the seafood industry
- an overview of the main issues for risk assessment, by country and region, by forms of employment, and to some extent by species
- the remedies and responses, drawing on the recent experience from Thailand.

PART B comprises a set of 15 risk assessment country or regional profiles. Seafish consulted with industry representative on which 15 countries or regions should be reviewed. These are:

- **Chile**
- **China**
- **Ecuador**
- **India**
- **Indonesia**
- **New Zealand**
- **Philippines**
- **Russian Federation**
- **South Africa**
- **South Korea**
- **Taiwan**
- **Thailand**
- **United Kingdom**
- **United States**
- **Vietnam**

PART C of the report comprises the above-mentioned literature review.

2. ETHICS, STANDARDS AND THE SEAFOOD INDUSTRY: ISSUES TO BE FACED

Context and key questions

This report is concerned with ethics in seafood supply chains. The concept of ethics is potentially a broad one. It can be interpreted as the application of human rights principles and standards in seafood production, with particular reference to the labour dimensions, and is generally equated with the *social* rather than *environmental* aspects of sustainability.

The growing attention to ethics and human rights in the seafood industry represents an intention to safeguard the rights of the *fishers*, rather than (or as well as) the fish and the oceans. There appears to be an emerging consensus that any approach to sustainable seafood, whether in codes of practice or labelling initiatives, should now incorporate the social as well as environmental dimensions.

This is clear from the emerging approach now taken by the main NGOs and the standard-setting bodies involved with private standards in fisheries and aquaculture. As observed by FAO², large-scale retailers and food service providers now drive the demand for certification to private standards schemes, in both the food safety or quality and sustainability areas. Private standards are a key mechanism to translate requirements, both product and process specifications, to other parts of the supply chain. In addition to providing insurance against negative publicity, this can help retailers and brand names address consumer demand for ethical products. Corporate social responsibility (CSR) policies now regularly include reference to a range of private standards.

The trend “from environmental to social” can be seen in many of the private standards and labelling initiatives either already established or under development. This includes the Seafish Responsible Fishing Scheme (RFS), the Global Aquaculture Alliance (GAA) and its Good Aquaculture Practice (GAP), the Marine Ingredients Organisation (IFFO) and the Aquaculture Stewardship Council (ASC). While some of these standards are “lighter” than others in the social area, both in detail and the extent of their coverage, there is a tendency to cover an increasing range of human and labour rights concerns by reference to the main international standards on the subjects.

Large UK retailers also have their own company codes of conduct, which tend to have similarly comprehensive coverage of human rights and labour standards. These standards will apply to a company’s own workforce in the UK. In an industry such as the seafood industry it will always be a challenge to monitor the application of such standards in complex supply chains. Should the focus be on the *worst forms of abuse* to which fishers can be exposed, such as slavery, slavery-like practices such as debt bondage, forced labour, child labour and human trafficking? Or should the industry also embrace a wider group of labour standards, such as those relating to freedom of association and collective bargaining, non-discrimination and gender equality, minimum wages and the payment of wages?

² Sally Washington and Lahsen Ababouch, *Private standards and certification in fisheries and aquaculture: Current practice and emerging issues*, FAO Fisheries and Aquaculture Technical Paper 553, Rome, 2011.

Moreover, to what extent should these be considered voluntary commitments, as part of an individual company's CSR initiatives? And to what extent is a company bound by national and international law to prevent and eradicate abusive practices in its operations and supply chains? For the UK seafood industry, what are the implications of the recent Modern Slavery Act, enacted by Parliament in March 2015? For example, will this improve due diligence of the seafood supply chain or may this increase the prospect of lawsuits against seafood companies, if it is alleged that products in their supply chains are tainted by forced labour and slavery?

Furthermore, what remedial actions can a company can be expected to take, if serious ethical problems are detected in its supply chains. Typically, in their codes of conduct companies have expressed "zero tolerance" for serious abuses such as forced labour or hazardous child labour in their supply chains. But does this mean that companies should cut off a supplier, and walk away from the problems once detected? Or are there arguments that the buyer companies should help their suppliers to remedy the problems? Interestingly, a survey of action by companies against forced labour and human trafficking in their supply chains, carried out by the international law firm Baker and McKenzie, has detected a move away from zero tolerance approaches toward more practical engagement with suppliers.

FROM ZERO TOLERANCE TO PRACTICAL ENGAGEMENT

While companies have previously taken a "zero tolerance" position to human trafficking and forced labour, our interviewees challenged this notion as perhaps too simplistic, failing to address the root causes. Complex challenges often require complex answers. Corporate thought leaders on this issue are beginning to move away from the black and white remedies of no tolerance toward a remediation focused approach in order to better protect potential victims. Instead of immediately shutting down a supplier, for example, many industry leaders are now using a worker-first approach which, in the first instance, calls for engaging with suppliers to improve practices.

Source: Managing Corporate Supply Chains: Challenges & successes in the fight to combat forced labour and human trafficking. Baker & McKenzie, 2014.

Later sections of this report review some of the remedial actions that have been taken by the seafood industry and individual companies, with a particular focus on the recent experience in Thailand. This section sets the context and discusses the concepts of human and labour rights in international law and the international instruments considered to be of most relevance to the seafood industry.

Worst forms of abuse: Slavery, Institutions and Practices similar to Slavery, Forced Labour, and Human Trafficking

The Seafish engagement on ethics has been triggered partly by media reports in mid 2014 of serious labour abuse, particularly on vessels, but to some extent also on land. However, for several years before then, a number of international organisations and NGOs had been documenting cases of forced labour and human trafficking in the fishing industry. A desk review on transnational organised crime in the fishing industry was published by the United Nations Office on Drugs and Crime in 2011³. It highlights the severity of the abuse of fishers trafficked for the purpose of forced labour on fishing vessels, together with the frequency of

³ *Trans national Organized Crime in the Fishing Industry (Focus on Trafficking in Persons, Smuggling of Migrants, Illicit Drugs Trafficking)*, UNODC, Vienna, 2011.

child labour in the fishing industry. A further overview study was published by the International Labour Organization (ILO) in 2013⁴. Its purpose is to “consolidate existing knowledge about forced labour and trafficking in the fisheries sector and to identify institutional and legal frameworks and multi-stakeholder initiatives that have the potential to positively affect fishers’ safety and working conditions”. Other reports and studies have been published in recent years by human rights and environmental NGOs, based in the UK and elsewhere, many of them focusing on seafood and fisheries in one country in particular, Thailand.

Forced labour, slavery and human trafficking are all serious criminal offences. They are prohibited by international laws and Conventions on these subjects. They are also dealt with as serious criminal offences in most national laws.

Slavery, Institutions and Practices similar to Slavery, and Debt bondage

Slavery is defined in a League of Nations Convention of 1926⁵ as the “status or condition of a person over whom any or all of the powers attaching to the right of ownership are exercised”. There is a further extensive definition of the slave trade, involving every act of trade or transport in slaves. Parties to this Convention undertake to prevent and suppress the slave trade, and to “bring about, progressively and as soon as possible, the complete abolition of slavery in all its forms”.

In 1956 the United Nations adopted a Supplementary Convention on the Abolition of Slavery, the Slave Trade, and Institutions and Practices Similar to Slavery⁶. One purpose is to clarify the concept of “institutions and practices similar to slavery”. These include debt bondage, as well as serfdom, forced marriage, and various forms of child exploitation. Debt bondage is defined as “the status or condition arising from a pledge by a debtor of his personal services or those of a person under his control as security for a debt, if the value of those services as reasonably applied is not applied towards the liquidation of the debt or the length and nature of those services are not respectively limited and defined”.

The term *Modern Slavery* is not defined in international law, and is generally seen as an umbrella term to encompass the various offences of slavery, forced labour and human trafficking. For the purpose of its Global Slavery Index, the Australia-based Walk Free Foundation states that “modern slavery involves one person possessing or controlling another person in such a way as to significantly deprive that person of their individual liberty, with the intention of exploiting that person through their use, management, profit, transfer or disposal”⁷.

Only in quite recent times have international criminal lawsuits been pursued against individuals for the offence of slavery or “enslavement”. An International Criminal Court was established in 1998⁸. Enslavement is considered a crime against humanity, falling within the Court’s jurisdiction. Enslavement is defined as “the exercise of any or all of the powers attaching to the right of ownership over a person

⁴⁴ *Caught at Sea: Forced Labour and Trafficking in Fisheries*, ILO, Geneva, 2013.

⁵ Slavery Convention, signed at Geneva on 25 September 1926. A Protocol amending the Slavery Convention was approved by UN General Assembly resolution 794 (VIII) of 23 October 1953, clarifying that duties and functions under the earlier instrument should be continued by the United Nations.

⁶ Adopted in September 1956, and entered into force on 30 April 1957.

⁷ Global Slavery Index 2014, Walk Free Foundation.

⁸ On 17 July 1998, the international community adopted the Rome Statute, the legal basis for establishing the permanent International Criminal Court. It is the first permanent, treaty based international court established to help end impunity for the perpetrators of the most serious crimes of concern to the international community.

and includes the exercise of such power in the course of trafficking in persons, in particular women and children”.

Forced labour

Forced labour is defined in an ILO Convention of 1930 (Convention No. 29) as “all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily”. The Convention established the principle that the illegal exaction of forced labour is a *criminal offence*. ILO Convention No. 29 has one of the highest level of ratifications by ILO Member States, totalling 177 in all by 2015. Notable exceptions were Canada, China and the U.S.

In 2014 the ILO adopted a new Protocol to its earlier Forced Labour Convention⁹, together with a non-binding Recommendation to guide state action. The new Protocol places emphasis on measures of prevention and protection, as well as prosecution, applying this to all instances or victims of forced labour. There is ample reference to remedies and compensation, and to improved protection for vulnerable migrant workers. The new ILO instruments also emphasise the role to be played by labour inspectorates and administration, in action against all forms of forced labour.

While the ILO definition of forced labour is brief and concise, it has also developed indicators to help both law enforcement and service providers to identify specific cases of forced labour. These have been widely used by such agencies as the UK-based Gangmasters Licensing Authority (GLA), adapted to national circumstances.

ILO INDICATORS OF FORCED LABOUR¹⁰	
<ul style="list-style-type: none">• Abuse of vulnerability• Deception• Restriction of freedom of movement• Isolation• Physical and sexual violence• Intimidation and threats• Retention of identity documents• Withholding of wages• Debt bondage• Abusive living and working conditions• Excessive overtime	

The forced labour “continuum”

There can be “grey areas” between the criminal offences (of forced labour, slavery and trafficking) and poor conditions of work. The ILO and others have referred to this *continuum* of forced labour. In the ILO’s words, “..there is a continuum including both what can clearly be defined as forced labour and other forms of labour exploitation and abuse. It may be useful to consider a range of possible situations with, at one end, slavery and slavery-like practices and, at the other end, situations of

⁹ Protocol of 2014 to the Forced Labour Convention, 1930. adopted by the International Labour Conference at its 103rd. session, Geneva, 11 June 2014.

¹⁰ Indicators of Forced Labour, ILO, Special Action Programme to Combat Forced Labour. www.ilo.org/forcedlabour.

freely chosen employment. In between the two extremes, there are a variety of employment relationships in which the element of free choice by the worker begins at least to be mitigated or constrained, and can eventually be cast into doubt”¹².

Human trafficking

While human trafficking on an international scale has a lengthy history, the offence of human trafficking was defined in a Protocol, adopted in 2000, to a United Nations Convention against Trans National Organized Crime.¹³ While the definition of “trafficking in persons” is somewhat complex, it involves a range of acts and means for the purpose of exploiting vulnerable persons. This can be for either sexual or labour exploitation, or for the removal of organs. The concept of *exploitation* is not defined as such. On the issue of trafficking for labour exploitation, this includes forced labour or services, slavery or practices similar to slavery, and servitude. The Trafficking Protocol entered into force in late 2003, and has since been very widely ratified by UN Member States.

The UK Modern Slavery Act¹⁴

Mention should be made of the recent UK legislation on modern slavery, adopted in March 2015 and now in force. Part 3 of the Act covers maritime enforcement. Clause 35 provides additional powers for law enforcement in England and Wales (the police, port police, British transport police, designated National Crime Agency officers, customs officials, or a member of Her Majesty’s Armed Forces) to tackle suspected human trafficking or slavery at sea. Similar powers are established in relation to ships in Scotland and Northern Ireland. As the background to the Bill explained before its adoption, “This is an issue because victims are in many cases trafficked illegally on vessels, and also may be the subject of slavery, servitude or forced labour on board vessels. Extending law enforcement powers in relation to modern slavery offences will enable the police and other relevant bodies to better protect suspected victims and bring offenders to justice”. The powers are set out in considerable detail, in various subsections of Part 3 of the Act.

Part 6 of the Act, of potential importance to the UK seafood industry, relates to transparency in supply chains. This requires all businesses over a certain threshold to disclose what steps they have taken to ensure that their business and supply chain are free from slavery. The model for this is the California Transparency in Supply Chain Act, 2010, which entered into force in that state in January 2012. The new UK legislation applies to commercial organisations (corporate bodies and partnerships, wherever incorporated or formed) which carry on a business or part of a business, in any sector, in the UK and which have a turnover over £ 36 million.

Applying the concepts to the seafood industry

Much of the recent negative publicity surrounding the seafood industry has concerned allegations of slavery and slavery-like practices. Allegations have also been made under the rubric of forced labour or human trafficking. In their worst forms, these have involved allegations of physical restraint, and physical violence on

¹² ILO, *The Cost of Coercion*, Global Report under the follow-up to the ILO Declaration on Fundamental Principles and Rights at Work, Geneva, 2009.

¹³ Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention against Transnational Organized Crime, United Nations, 2000.

¹⁴ The Modern Slavery Act 2015 received Royal Assent on 267 March 2015.

vessels. Isolation on vessels on the high seas makes fishermen particularly vulnerable to these extreme forms of abuse.

Yet the allegations of abuse, either at sea or on land, tend also to cover such concerns as abusive brokerage practices, unfair deductions from wages, harsh working conditions, inadequate health and safety, among others. While some of these concerns are covered by the ILO indicators on forced labour, referred to above, others may not be.

Using human rights and labour standards: broader perspectives

In addressing ethical concerns in seafood, it is important to go beyond the instruments on the worst forms of abuse. Other UN and ILO instruments, together with their monitoring and enforcement mechanisms, can be of much relevance.

The ILO attaches great importance to its “fundamental” human rights Conventions, the principles of which each Member State must now accept as a condition of its membership¹⁵. These cover the eradication of forced and child labour, freedom of association and collective bargaining, and the elimination of discrimination in respect of employment and occupation. It also has “priority governance” Conventions (on such issues as labour inspection and employment policy) and a large number of technical Conventions on different subject matters. Of the latter, given the problems that have arisen over labour brokerage in the seafood industry, mention should be made of the Private Employment Agencies Convention, 1997 (No. 181). This establishes the basic principle that private employment agencies shall not charge directly or indirectly, in whole or in part, any fees or costs to workers. Exceptions can only be made in respect of certain categories of workers, after the competent authority has consulted the most representative organizations of employers and workers. Other measures under this Convention include laws or regulations which provide for penalties, including prohibition of those private employment agencies which engage in fraudulent practices or abuses. Other relevant ILO instruments include Conventions adopted in 1949 and 1975 on migration for employment and migrant workers.

As regards the living and working conditions of fishers, the highest ILO benchmark is its Work in Fishing Convention, 2007 (No. 188). It has the broad objective to “ensure that fishers have decent conditions of work on board fishing vessels with regard to minimum requirements or work on board; conditions of service; accommodation and food; occupational safety and health protection; medical care and social security”. The important section on conditions of service has detailed provisions on such aspects as: manning and hours of rest; crew list; fisher’s work agreement; repatriation; recruitment and placement; and payment of fishers. It reaffirms the provisions of the Private Employment Agencies Convention that no fees or other charges for recruitment and placement of fishers should be borne by the fishers, either directly or indirectly. Moreover, any recruitment or placement service for fishers should operate in conformity with a standardised system of licensing or certification, or other form of regulation. The Convention also sets out the responsibilities of fishing vessel owners, skippers and fishers.

By August 2015, the ILO’s Work in Fishing Convention was not yet in force. It will come into force 12 months after the date on which the ratifications of ten ILO

¹⁵ Declaration on Fundamental Principles and Rights at Work and its Follow-up, ILO, June 1998.

Members, eight of which are coastal states have been registered with the ILO Director-General. Only five ratifications have so far been registered¹⁶.

The United Nation's Office of the High Commissioner for Human Rights lists ten core international human rights instruments. Each of these instruments (nine human rights treaties and the Optional Protocol to the Convention against Torture) has established a committee of experts to monitor implementation of the treaty provisions by States parties. Some of the treaties are supplemented by optional protocols dealing with specific concerns. Under UN special procedures, Special Rapporteurs can also be appointed to address thematic concerns, carrying out country visits as appropriate subject to the approval of the government concerned.

UN CORE INTERNATIONAL HUMAN RIGHTS INSTRUMENTS¹⁷

- International Convention on the Elimination of All Forms of Racial Discrimination, 1965
- International Covenant on Civil and Political Rights, 1966
- International Covenant on Economic, Social and Cultural Rights, 1966
- Convention on the Elimination of All Forms of Discrimination against Women, 1979
- Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, 1984
- Convention on the Rights of the Child, 1989
- International Convention on the Rights of All Migrant Workers and Members of their Families, 1990
- International Convention on the Protection of All Persons from Enforced Disappearance, 2006
- Convention on the Rights of Persons with Disabilities, 2006

The extent to which individual countries have ratified these various core instruments, together with the ratification of option protocols and the acceptance of country visits by Special Rapporteurs, can be an important indicator of the overall national climate for the promotion and protection of human rights. The vast majority of countries have now ratified the instruments on racial discrimination; civil and political rights; economic, social and cultural rights; discrimination against women; torture; the rights of the child; and to some extent persons with disabilities. There has been greater reluctance, particularly amongst Western countries, to ratify the instrument on migrant workers.

In a limited number of cases, UN Special Rapporteurs have addressed the rights of fishers or seafood workers in their country reporting. An example is a country visit to South Korea in late 2014, in which a Special Rapporteur specifically addressed allegations of abuse against foreign seafarers on the high seas, and made a number of recommendations to the government for tackling wage discrimination against foreign seafarers, ensuring proper inspection, and establishing a reporting mechanism for foreign seafarers to register violations and abuse¹⁹.

¹⁶ Argentina, Bosnia and Herzegovina, Congo, Morocco and South Africa.

¹⁷ www.ohchr.org

¹⁹ "Report of the Special Rapporteur on contemporary forms of racism, racial discrimination, xenophobia and related intolerance", Mutuma Ruteere, UN Doc. A/HRC/2946/Add.1, Human Rights Council, Twenty-ninth session, 20 April 2015.

Implications for the UK seafood industry

There will always be difficult choices for the UK companies that source seafood products from overseas countries, particularly those that have an imperfect human rights record. What are the minimum human rights requirements for the exporting country as a whole, before a company decision is taken to do business there? How much due diligence should be conducted, using the company's own or third party auditors, before deciding to source from a particular supplier? What is the kind or level of violations that can trigger a decision to disengage from a supplier, rather than seek to remediate the problems? When there are structural concerns (such as widespread use of illegal brokerage) behind the violations, then how can individual companies, or groups of buyers working together, best engage with government and other stakeholders to press for appropriate reforms?

The international standards, together with their monitoring and supervisory mechanisms, can be of some use for differentiating between issues surrounding different levels of gravity. So far there has been almost no litigation against private companies for complicity in forced labour, slavery or human trafficking, but the risk is nevertheless here. The increasing media and NGO attention on human and labour rights in the seafood industry may well trigger some strategic litigation in future. It is also morally repugnant for companies to be perceived, in some cases perhaps rightly, as sourcing seafood products from vessels tainted with slave labour. In such cases, individual buyers may have no alternative but to disengage.

In most cases, however, the challenge for UK companies will be to use their influence to achieve gradual improvements in working conditions on vessels and on land in the supplier countries. In seeking this, it can be important not to attempt to try to do more than is really feasible, or spread the net of activity too broadly. It is important to reach understanding as to the incremental steps that can be taken, either by the industry alone or in collaboration with others, to achieve the goals set out in such instruments as the Seafish RFS or the ILO's Working in Fishing Convention.

3. ETHICAL CONCERNS IN SEAFOOD SUPPLY CHAINS: OVERVIEW FOR RISK ASSESSMENT

The challenges

To identify patterns of human and labour rights abuse in seafood is a daunting task. There have been appalling and egregious violations, for example those affecting Burmese or Cambodian migrant fishers on the vessels of other Asian countries. These have now been quite extensively documented, through media reports and the reports of human rights and environmental NGOs. While much of the emphasis has been on one country, Thailand, it is recognised that the problem is bigger than this, and affects other parts of the Asian region. There have been sporadic reports of the severe exploitation of migrant Asian fishers on Chinese, Korean, Taiwanese and Thai vessels in Asian and Pacific waters, and – in the case of distant water fishing (DWF) – even off the coast of West or South Africa, or Latin America.

There are gradations of the problems, and different degrees of severity. At the bottom end are the most severe abuses, the slavery-like practices that have been documented on some Thai vessels. Yet in all cases, difficult working conditions are inherent to the fishing industry. Fishing involves long hours of work and strenuous activity in a challenging marine environment. Moreover, the globalisation of the

fishing industry has brought a range of new challenges for the protection of workers on vessels. The vessels may be at sea for long periods, in distant fishing grounds and way beyond the reach of national labour inspection systems.

At particular risk are the migrant workers, now increasingly manning the vessels in a wide range of both developed and developing countries. The increasing use of migrant fishers, whether in the UK or in the Asian countries, can be attributed to several factors. One is labour shortage, in that nationals of the countries where the fishing vessels are registered or conduct their operations may be simply unwilling to accept the work, at least for the low salaries offered. A related factor is that many distant water fishing vessels are now at sea for longer and longer periods, perhaps for a year or more at a time, making it an even less attractive form of work. A third and important factor is that in many cases the entire business operation is illegal (involving illegal brokerage, serious violations of labour law, and illegal fishing), and the vessel owners can use undocumented migrants both to cut costs and help escape the attention of law enforcement authorities.

This section aims to present an overview, providing broad guidance for risk assessment:

- By region
- By forms of employment
- By species, where relevant

Risk assessment by region and by country

By far the biggest ethical risks for the seafood industry are in **Asia**, and particularly **East and Southeast Asia**.

In 2015 **Thailand** remained at Tier 3 on the U.S. State Department Trafficking in Persons (TIP) report (the lowest tier for high risk countries), despite a number of government interventions, supported by partnerships with the seafood industry, including UK companies. Media reports continue to highlight extreme cases of abuse against migrant fishermen on Thai vessels, engaged in distant water fishing in the waters of countries including Indonesia and Papua New Guinea. The main factors behind the serious abuses on Thai vessels are:

- Widespread use of migrant fishermen, often irregular migrants without contracts, from such poor neighbouring countries as Cambodia and Myanmar
- Lack of government control over distant water vessels, which have a long history of abusive treatment of their crews.

In Thailand there has also been a pattern of labour abuse against irregular migrants on land, for example in unregistered peeling sheds.

In other countries of the region, the risk is also greatest in deep-sea fishing. In **China** for example, labour abuses have been documented aboard Chinese and Chinese-flagged vessels in a number of oceans, as far away as African and Latin American waters. While there is some evidence that labour conditions have improved recently in Chinese processing plants, as the labour market has tightened, some Chinese deep-water vessels have been following the Asian pattern of using migrant workers. This is also the case for **South Korea** and **Taiwan**, both of which have large distant-water fleets substantially crewed by migrant workers. In both of these countries, labour abuses against migrants have been sporadically documented by

the media, or by human rights NGOs, but the issues have received a relatively low profile at the national level. While abuses have also been documented on vessels (notably Thai vessels) in the waters of **Indonesia**, this country has now taken some high profile remedial measures, such as a Task Force on slavery and IUU fishing.

Even when there has been no evidence of such serious abuses as forced labour and human trafficking, a further issue of concern can be the payment of low wages in the seafood processing industry. This issue has been raised in a recent NGO reports on countries including **Vietnam**²⁰, a country with rapidly expanding seafood exports to countries including the UK.

In other developing countries and regions, there has been less documentation of serious labour abuse. There has been limited systematic reporting outside Asia. Where serious abuses have been documented, this is often on Asian-flagged vessels in African or Latin American waters. Labour brokers from these Asian countries can play a role in the deployment of Asian crews on Asian-flagged vessels, far away from their countries of origin. For example, abusive labour brokerage systems have been documented in Capetown, **South Africa**²¹. Deceptive and abusive practices have also been reported in the recruitment of migrant fishers from Myanmar, deployed on fishing vessels in **Russia**.²²

A generalised issue of concern – whether in the Asia and Latin American region, or even in the more industrialised countries – has been employment conditions including wage levels in seafood processing. The risks of abuse are highest when there is extensive use of contract labour, and notably when temporary workers are recruited from abroad under special visa arrangements. In **Chile**, concerns have been expressed about the employment conditions of contract workers in the salmon processing industry²³. Similar concerns have been expressed in **India**²⁴ (though some of the reports are a decade or more old), where most work in the processing plants has been done by women. In the **United States**²⁵, there have been isolated reports of labour abuse against foreign workers in the seafood or crab processing industry of different states, who are brought in as temporary workers under special visa arrangements for industries that have difficulty in recruiting U.S. nationals.

Restrictive visa arrangements for fishermen recruited from overseas has also been an issue of concern in the **United Kingdom**. In recent years a number of cases of human trafficking of fishermen recruited from overseas (from the Philippines, and most recently from Ghana) have either been documented under the National Referral Mechanism of the UK Human Trafficking Centre (UKHTC)²⁶, or have been investigated by criminal law enforcement. There are concerns that the particular status of these overseas fishermen deprives them of the full protection of employment law on UK vessels.

²⁰ Caught in a trap: the story of poverty wages behind Asian shrimp sold in European supermarkets, Fairfood International. April 2015. The data for this report is taken mainly from Bangladesh, India and Vietnam.

²¹ In African Waters: The trafficking of Cambodian fishers in South Africa, Rebecca Surtees, International Organisation for Migration/ Nexus Institute, 2014.

²² "Trawler tragedy lifts veil on illegal recruitment", Myanmar Times, 7 April 2015.

²³ *Improving governance of aquaculture employment: a global assessment*, FAO Fisheries and Aquaculture Technical Paper 575, 2014

²⁴ For example, Dhanya G, "Status of women employed in seafood pre-processing units of Alaphuza, Kerala", Fishing Chimes, Vol. 33, No.7/October 2013.

²⁵ Immigration Facts: Temporary Migrant Workers", Brookings, 18 June 2013.

²⁶ See, for example: National Crime Agency (NCA), "NCA Strategic Assessment: The Nature and Scale of Human Trafficking in 2013", 30 September 2014.

Risk assessment by form of employment

As in any industry, the fishers or seafood workers with irregular migration or employment status are the most vulnerable. They have no protection under law. When they are isolated in vessels on the high seas, they are uniquely vulnerable.

Many migrant fishers enter the destination country through networks of labour brokers, incurring substantial debts that have to be repaid through deductions from wages. When the labour brokerage is informal and unregulated, and when the workers have no contracts of employment, there is huge potential for abuse. Excessive charges, and effective non-payment or under-payment of wages, have been extensively documented in a country like **Thailand**, where many of the Burmese and Cambodian migrant fishers enter the country with the assistance of brokers²⁷.

Moreover, substantial brokerage fees can be paid by migrant fishers, even when they go through legally recognised recruitment agencies. For example, the extent of such placement fees has been documented for **South Korea**²⁸. Under the current system, operated by private agencies, the migrant fishermen have to pay high recruitment and placement fees to the agency in their home country, and to pay management fees to an agency in South Korea. According to estimates of the National Human Rights Commission of Korea²⁹, the average amount spent to come to Korea was US\$ 14,485 in the case of migrant fishers from Vietnam, US\$ 10,562 for those from China, and US\$ 4,556 for those from Indonesia.

In summary, the risks of abuse are greatest when *either* migrant fishers are engaged on a clandestine basis, with no employment contracts of any form (written or verbal) *or* the migrant or other fishers are engaged through subcontracting agencies (often meaning they will have substantial deductions from their wages).

Risk assessment by species

Are higher ethical risks associated with some species of fish or seafood product, than for others? It is a difficult hypothetical question. There is no *prima facie* reason why any species or product cannot be caught or produced in an ethically sustainable way, with full enforcement of human and labour rights.

Tuna

This being said, certain products caught or produced in certain ways have been singled out in media and NGO reports. Greenpeace for example has highlighted a pattern of severe labour abuse on longline vessels catching albacore for canned tuna markets of the wealthier countries³⁰. In July 2015, it released a series of videos documenting such abuses from the South Pacific, featuring migrant fishermen from Indonesia and other countries. But there is no suggestion that tuna fishing itself is inherently high risk on ethical grounds. Rather, it is a particular form of tuna catching on particular kinds of vessels that increases the risk of human rights abuse in certain countries and regions.

²⁷ See for example: *Recruited into Slavery: How unethical recruitment puts migrant workers at risk for trafficking*, Interfaith Center on Corporate Responsibility, New York, April 2015.

²⁸ Hansuk Lee, "Discrimination against Migrant Fishermen on Korean Fishing Vessels", Migration and Human Rights Institute, 2014.

²⁹ "Human Rights Conditions of Migrant Workers in the Fishing Industry", National Human Rights Commission of Korea (NHRCK), 2012.

³⁰ www.greenpeace.org. Blog of 30 July 2015. "This week Greenpeace USA released five new video testimonials from Pacific tuna fishermen describing the horrible conditions...."

A focus on human rights concerns in the fishing of a particular species, if conducted by a reputed research organisation, can also draw widespread attention to the risks associated with that species. Again, an example is tuna fishing. Between 2008-2011, with a grant from the U.S. Department of Labor, the NGO Verité carried out research on the presence of indicators of forced labour in the production of ten goods in seven countries³¹, one of which was tuna in the Philippines. This research was not actually intended to determine the existence or scale of forced labour in the countries and sectors under study, but rather to identify the presence of *indicators* of forced labour and factors that increased the vulnerability of workers to labour exploitation. The research nevertheless put tuna production in this country on buyer and other radar screens in the U.S., highlighting a number of abuses both on vessels and in the canning industry.

Shrimp

A second species attracting a high degree of scrutiny has been shrimp together with shrimp feed, particularly in Thailand but also more broadly. Many reports focus on the labour intensive nature of shrimp farming, processing and peeling shed operations in different countries, though with a particular focus on Bangladesh and Thailand with their very different production models³². For example, a few years back a study was prepared for Humanity United, on exploitative labour practices in the global shrimp industry³³. Based largely on case studies in Bangladesh and Thailand, it identifies both common trends and differences in patterns of exploitation, sometimes requiring different remedies. In brief, “Bangladeshi fry collectors and shrimp farmers suffer from price manipulation and debt-bondage through predatory moneylenders or traders further up the chain, while Thailand fills its shrimp-peeling sheds with migrant workers from Burma, who are often trafficked or abused”.

This study also suggests that issues of labour exploitation are likely to be found in the shrimp industries of the other major exporting countries. “In looking at the underlying issues that allow and indeed cause exploitation to take place, it is clear that similar practices could be taking place in the other major shrimp-producing countries in Asia and Latin America. While no widespread reports have been commissioned to study industries in China, Ecuador, Indonesia, India or Vietnam, it does not mean that such practices do not occur. Given the similarities in the comparable basic structures of the supply chains, and the inability of developing countries’ governments to regulate appropriate labour standards, it is in fact highly likely that the problems that have been documented in Bangladesh and Thailand are also present in the other primary shrimp exporting countries”. The study makes a number of useful recommendations for corporate practice at different levels of the seafood supply chain (including the establishment of ethical labour brokers, and the registration of the peeling sheds where so many of the abuses against vulnerable migrant workers have been documented).

None of this means that exploitation is *unavoidable* in the shrimp industry in developing countries. It means only that there is a fairly high degree of risk, associated with intensive production, and that the risk is compounded when there is a substantial presence of contracted workers, and particularly migrant workers. But there are also examples of modern shrimp processing facilities, for example in India,

³¹ *Research on Indicators of Forced Labour in the Supply Chain of Tuna in the Philippines*, Verité, 2012.

³² For example, *The True Cost of Shrimp*, Solidarity Center, Washington DC, January 2008.

³³ *Exploitative Labor Practices in the Global Shrimp Industry*, Prepared by Accenture for Humanity United (undated, but apparently 2012).

where recent audits by UK buying companies have not detected any reports of labour abuse³⁴.

Illegal, Unreported and Unregulated (IUU) fishing

Beyond these species, in the human rights and media reporting there has not been a specific focus on a particular species. Wherever there is widespread IUU fishing, whatever the species, there is reason to suspect labour abuse against the crews. Patagonian toothfish and squid are among the species to have been mentioned in this regard.

While the link between IUU fishing and exploitative labour practices has often been assumed, it has not been rigorously documented on a systematic basis. In fact some of the recent and high profile initiatives on IUU fishing do not address labour concerns as such. An example is the United States Presidential Task Force on IUU fishing and seafood fraud³⁵. At the same time however there has been a concerted effort by international organisations, NGOs, and law enforcement agencies such as INTERPOL to jointly address the concerns of IUU fishing and fisheries crime relating to labour. A recent example is a 2015 publication by the Global Initiative against Transnational Organized Crime³⁶. In addition to mapping out the issues, this contains a case study on violence, abuse and labour violations in the fishing industry. At country level, the most recent reports and campaigning of the Environmental Justice Foundation on Thailand have called for over-fishing, IUU fishing and modern slavery to be considered as interconnected issues³⁷.

As regards the international agencies responsible for law enforcement on fisheries and other crimes, there is clearly an awareness of the linkages between IUU fishing and human trafficking or severe labour exploitation, but again very little in the way of specific cases. During the project, consultations were held with both the UN Office on Drugs and Crime (UNODC) and with INTERPOL. UNODC has issued publications on organised crime at sea, underscoring the interlinked emerging crimes at sea, including piracy and armed robbery, migrant smuggling and trafficking in persons³⁸. In February 2013 INTERPOL established its Project Scale to disrupt transnational fisheries crime, including human trafficking³⁹. However, in a telephone consultation several INTERPOL officials recognised the difficulty in establishing specific cases⁴⁰.

In summary, a focus on IUU fishing – together with the potential sanctions that can follow from such measures as an EU Yellow Card on IUU fishing – can help draw attention to related cases of labour exploitation. And conversely, when the seafood industry and other stakeholders take initiatives to address human trafficking and labour exploitation in supply chains, they may explicitly recognise the linkages between these problems and IUU fishing. An example is the work of the industry-led Shrimp Sustainable Supply Chain Task Force in Thailand (see further, below), which

³⁴ Interview with auditor from UK seafood supplier company, 3 July 2015. This experienced auditor had carried out extensive audits of modern shrimp processing plants in India, and not encountered any problems.

³⁵ Presidential Task Force on Combating IUU Fishing and Seafood Fraud: Action Plan for Implementing the Task Force Recommendations, Washington DC, 2015.

³⁶ The Illegal Fishing and Organized Crime Nexus, Global Initiative against Transnational Organized Crime/ The Blackfish, April 2015.

³⁷ Pirates and Slaves: How Overfishing in Thailand Fuels Human Trafficking and the Plundering of the Oceans, EJF, March 2015.

³⁸ For example, Combating Transnational Organized Crime Committed at Sea: Issue Paper, UNODC, 2013.

³⁹ www.interpol.int/Crime-areas/Environmental-crime/Projects/Project-Scale

⁴⁰ Consultation with INTERPOL, 6 May 2015.

“recognises that human rights issues and marine conservation problems are both linked with illegal, unreported and unregulated fishing (IUU) and its objectives are set based on this fundamental understanding”⁴¹.

Creative thinking is now needed, as to how the various instruments and measures that are now being devised to combat IUU fishing could be used to ensure greater protection for at-risk seafood workers from exploitation. One possibility would be to expand the role of existing observers to carry out a dual function.

4. BUSINESS AND OTHER STAKEHOLDER RESPONSES

As part of this project, consultations were held with different stakeholders (mainly with the seafood industry, but also with others including trade unions, international organisations, NGOs, academics and policy makers) in order to discuss their views and priorities for future work. Most of the consultations were held by telephone and skype, though some were held in person.

In the UK, the consultations covered the major retailers and supermarket chains, and the main seafood suppliers (both primary and secondary processors). Consultations were also held in person or by phone with the main government agencies, including the Home Office, Defra, the National Crime Agency, and the Gangmasters Licensing Authority (GLA), with relevant trade union bodies and charities, among others.

Widespread consultations were held internationally, with experts on the subject, government officials from select countries, international organizations and NGOs active in the seafood sector.

Business responses

Rather than distribute a questionnaire for written responses, it was decided to keep the consultations as open-ended as possible. Nevertheless, as a certain number of those consulted expressed a desire to see specific questions, a briefing note and questionnaire was prepared and distributed to this effect. Specific questions were divided into four main areas:

- Overall framework
- Sourcing, auditing and risk assessment
- Remediation, responses and partnerships
- Reporting.

Overall framework: Expectations from the project

The main purpose was to assess industry views as to how this project and its follow-up could be of most value to the seafood industry, to identify the main knowledge gaps, and to ascertain what aspects of the project would be of most relevance.

⁴¹ Shrimp Sustainable Supply Chain Task Force: Overview and Progress Update – May 2015.

Perceptions and priorities varied considerably. At one end of the spectrum, some industry representatives felt that the time had now come for an industry-wide code of practice, together with a detailed road map, setting out the incremental measures that needed to be taken to address a range of ethical concerns in the seafood supply chains. At the other end of the spectrum, some respondents placed more emphasis on country and regional profiles, on an integrated toolkit with guidance for action, and on “how to” guidance tailored to the circumstances of the individual countries in which the seafood companies were operating.

Beyond that, the importance of intelligence and information sharing was continually highlighted. A number of industry representatives said that the very existence of the Seafood Ethics Common Language Group (SECLG) was an invaluable asset, bringing a range of different seafood companies together with NGOs, government agencies and other stakeholders to address concerns that either had not hitherto been on their radar screen, or were so complex they had not been sufficiently understood before.

The value of the comparative exchange of information with seafood representatives from other countries was also identified. In January 2015 several interlocutors had attended a two-day meeting in Reykjavik, Iceland, jointly organised by Seafish and the U.S. National Fisheries Institute (NFI), to discuss the options for driving change in the seafood supply chain⁴². This particular meeting had focused almost exclusively on Thailand, and on the concerns of human trafficking and labour exploitation in supply chains. But it was recognised by participants that the problems were not limited to this country, that the spotlight could soon fall on others, and that it was essential to learn from the Thai experience in order to take preventive and remedial action elsewhere.

Sourcing, risk mapping and prior auditing, and certification

The consultations on this point covered a range of issues. To what extent did a seafood company conduct its own risk mapping when sourcing new products? To what extent did it rely on external information and actors? What external information and guidance tools are available on social issues, and how useful are they? What are the main information gaps, and what practical help is needed on these issues?

Inevitably, the responses varied by type and size of company. A large retailer will conduct its own prior audits. So will some, but not all, of the UK-based seafood suppliers. The large retailers and some suppliers are generally confident that they have the skills and capacity to conduct or commission factory audits (though these can be expensive, if thoroughly done). They agree that these cannot reach down to the level of the vessel, but can with difficulty cover fish and feed mill plants and facilities.

There are also discussions as to *what aspects* of labour rights should be covered by initial and follow-up audits, and what tools and mechanisms can be used for initial risk assessment at the country, species or fishery level.

As the social dimensions of sustainable seafood rise ever higher on policy and company agendas, some concerns were expressed as to the proliferation of NGO codes and benchmarks. This is a rapidly growing area of NGO activity. In the

⁴² US & European Seafood Supply Chain: Driving Change in the Seafood Supply Chain, 21-23 January 2015, Reykjavik, Iceland. This was organized as a private meeting of seafood companies and retailers, and no report is publicly available.

area of certification and labelling, groups like the Aquaculture Stewardship Council (ASC), GAA and GlobalG.A.P. already have considerable coverage of social issues in their codes, while others including IFFO have embarked on efforts to revise their earlier codes accordingly.

A concern of the industry is that the various codes should be consistent, and also pragmatic. For example, the coverage can be very broad, with reference to a wide range of international instruments on human and labour rights, but the guidance needs to be translated into user friendly checklists for auditors.

At the same time, seafood industry interlocutors seemed to welcome the various risk assessment initiatives, sometimes experimental, that were being undertaken by NGOs. An example was the human rights risk indicator for fisheries, now being developed by the Sustainable Fisheries Partnership (SFP) with the active engagement of a number of seafood companies in a pilot stage⁴³. Companies also highlighted the importance of the ongoing efforts by Seafish to incorporate social dimensions in a revised Responsible Fishing Scheme (RFS), the only standard of its kind to apply specifically to vessels, and related efforts to incorporate ethical factors in the Seafish Risk Assessment for Sourcing Seafood (RASS).

Remediation, responses and partnerships

The main purpose was to discuss the options for response, when ethical concerns in a supply chain are either detected by a company or reported by others. Under what circumstances, if any, should a company cut off from a supplier? What are the criteria for differentiating between cases that require a “zero tolerance” response, and cases that call for active remediation? In the latter case, who are the best partners for addressing problems on the ground? What has been the experience with governments, international organisations and NGOs? What has been learned from the experience in Thailand?

This part of the consultations focused in large part on the experience in Thailand over the past year. Generally, the attitude was that the seafood industry should pool efforts to remediate problems. In the words of one interlocutor from a major UK retailer, “we cannot simply walk away from Thailand”.

However, when seafood companies become engaged in some aspects of remediation, a key question was how far their responsibilities should extend. They could put pressure on their own suppliers, and beef up their site visits. But there was only so much that industry can do before the need for more government intervention (including adequate regulation, monitoring and law enforcement) was necessary.

Three main partnerships in Thailand, in each of which UK companies have had strong and active participation, were discussed with seafood industry interlocutors. These are the **Issara Project**, an NGO initiative with the initial support of Anti Slavery International⁴⁴; the **Good Labour Practices** (GLP) project, originally pioneered by the ILO⁴⁵; and the **Shrimp Sustainable Supply Chain Task Force**, originally created by the CP Foods company, but now enjoying widespread

⁴³ For further information, see: www.seafish.org/media/1410704/seclg_july_2015_managingrisk.pdf. This uses a number of proxies that correlate in a positive or negative way with labour abuses in the supply chain, in order to determine the level of risk in different fisheries.

⁴⁴ www.projectissara.org

⁴⁵ www.ilo.org/Asia

participation by UK and other international companies and NGOs. The diverse partnerships have had different objectives and activities. Some have sought more than others to influence government policies. Others have given more emphasis to dealing with cases of individual abuse in a company's supply chain, and taking remedial action to protect or compensate the migrant worker. Others have sought to act as a bridge between work at the grassroots level, and the engagement of the government or industry-wide federations.

Interlocutors saw strong points in each of these partnerships. The Issara Project was highlighted as a highly innovative way to probe deep into supply chains, and to engage wherever possible in local-level remediation, or negotiation for compensation. It was mainly ground-level work, acting as the "eyes and ears" of the industry, in a non-critical way. Reports to individual companies on their supply chains were confidential.

The GLP project was seen as a bridge-builder between the overseas companies, the Thai seafood industry and government agencies, with a strong focus on training.

The Task Force on shrimp was seen as in many ways the most ambitious of the partnerships, with a gradually expanding membership, and also the assumption of more and more tasks. Its work on tracking and tracing of shrimp feed was important at the ground level. At the higher policy level, the Task Force has also been a useful vehicle for raising difficult policy concerns with the Government of Thailand, particularly its Department of Fisheries (DOF), and for offering technical assistance on such matters as vessel monitoring systems (VMS) technology.

While the experience in Thailand is clearly unique, there are expectations that it can be used as a model for other countries.

Reporting

Good and transparent reporting on supply chain management is of vital importance, and has become yet more so with the entry into force of the UK Modern Slavery Act. The discussions focused on awareness of the Act, implications for the seafood industry and companies of a transparency clause, whether provision had been made for such reporting, what assistance if any was required, and whether it was useful to think in terms of industry-wide reporting on issues of common concern.

Companies had varying levels of awareness of the Act itself. Persons who had attended SECLG meetings had fairly strong awareness, as presentations had been made by Home Office officials. Moreover, while UK companies have reported in some detail on their website on their overall CSR policies and codes of conduct, there has been only limited reporting on practical action. Several interlocutors welcomed the idea of joint reporting, and in particular of a technical meeting between the companies in order to plan for this.

Responses from other stakeholders: brief overview

The many comments received from other stakeholders, covering a range of different aspects, can only be covered very briefly here. One major point, echoed by other respondents, was the need to focus on the structural factors behind the serious, and according to some persons growing, incidence of labour exploitation in the seafood industry.

Another common concern was the absence of reliable and detailed information on these abuses, particularly at sea and in distant water fishing. Though every effort was made over the course of the project to identify and discuss with persons with expertise on the subject, a common response was the extreme difficulty of conducting such research on a hidden problem. Moreover, several qualified researchers, with previous experience of these concerns, pointed to the difficulties in securing funding for research proposals. This all points to an evident need for donor agencies to accord higher priority to ethics and seafood, and particularly in the first instance to improving the knowledge base.

5. LESSONS FROM THE THAI EXPERIENCE

Responding to serious allegations, some of which named specific UK companies, UK organisations and other companies in the Thai seafood industry have taken a deliberate decision to work together, to engage with NGOs, and in some cases work in close co-operation with the government. All of this has taken place while Thailand has remained in the international spotlight on the grounds of severe human rights and labour abuse, with a steady stream of media reports documenting specific cases.

This means that UK companies operating in Thailand (which is currently at risk of negative publicity), have had to act on several fronts. They have had to (at the very least):

- Exercise a very high degree of due diligence in their own supply chains
- Report on the measures taken, and any problems detected
- Engage with Thai industry associations in the different production areas, persuading them to take measures of their own
- Lobby the government to adopt needed reforms (for example with regard to labour brokering, and the protection of migrant workers), and to improve its monitoring and law enforcement.

Beyond this, there have been other areas of engagement. For example, the Shrimp Feed Task Force has in some ways assumed the role of a technical adviser to the Thai government, particularly the DOF, on such issues as VMS monitoring. There is scope for expanded pilot programmes to engage Thai vessels in the Seafish RFS Improvers Programme, as part of overall efforts to roll out the RFS on a more global level.

One concern is that the various initiatives should not become too atomized, through different and sometimes overlapping partnerships. When recommendations are made on broad policy issues, when they impact on labour rights and other ethical concerns, as many stakeholders as possible need to be involved. It is important to tap the experience of the UK and other international buyers, the Thai industry associations, the main Thai companies, international and national NGOs, diverse government agencies, and to some extent academic and policy groups.

The seafood industry also needs to monitor and report on progress, in a balanced and impartial way. For example, the various efforts to implement track and trace systems for seafood products need to be backed up by independent verification.

For further information on the 'experience of partnership in Thailand' see the Thailand profile.

6. CONCLUDING COMMENTS

Some of the pilot experience in Thailand could usefully be applied to other countries where ethical concerns are, at least to some extent, on company radar screens. For example, in only a few of the main supplier countries to the UK market has there been any opportunity for the UK and other international buyers to engage at a policy level. Nor has there been much rigorous documentation of labour conditions in different parts of the seafood industry, such as shrimp and other seafood processing, where there are *prima facie* reasons to believe that ethical concerns may occur. Research conducted during this project suggested that, in a country such as India, most of the reports on this subject are now quite dated. And in countries such as China and Vietnam, where seafood processing for export markets has expanded quite rapidly, almost no research on labour issues could be detected.

Moreover, if only one sector in one country is singled out for in-depth research, this may present an unbalanced picture. The finger of responsibility may be pointed at this one country, while there are good reasons to believe that similar labour conditions prevail in the same seafood sector in other countries. Comparative studies will always be the best way forward.

While more fact-finding and documentation is now urgently needed, as an integral part of risk assessment, it is necessary to consider how seafood companies could best contribute to this. The unique circumstances of Thailand have permitted a good deal of fact-finding and assessment, though much of the findings remain confidential. In other countries, where there is some level of risk, companies might agree to share some of their audit findings in a common information bank. This could generate some initial information, on the basis of which sector-wide studies and assessments could subsequently take place.

But what kind of organisation or agency is best equipped to conduct and disseminate such studies? At the country level, it is best to find a national partner with a reputation for balanced research, independent of the government, but not too closely linked to lobby groups. In Thailand, the Asia Research Center for Migration of Chulalongkorn University has built up a good reputation and experience, for instance partnering with the ILO and the seafood industry in a well documented study on employment practices and working conditions in Thailand's fishing sector⁴⁶.

At the regional level, there need to be similar partnerships with academic and policy institutions in other East and Southeast Asian countries, particularly those where ethical problems have been associated with distant water fishing or IUU fishing. There is a tendency simply to point to the lack of reliable information on vessels, and the immense difficulty in obtaining it. But with a bit of effort, it would not be too difficult to put together an investigative project on employment conditions in distant water fishing, covering such countries as China, Indonesia, South Korea, the Philippines, Taiwan and Thailand. Where migrant fishers are involved, such a project would also need to involve research institutes in the sender countries, such as Cambodia, Myanmar and Vietnam. If well conducted, over a reasonable time this could shed a needed light on the social dimensions of traceability in Asian distant water fishing (presently a black hole of information).

⁴⁶ *Employment practices and working conditions in Thailand's fishing sector*, Asian Research Centre for Migration, Institute of Asian Studies, Chulalongkorn University, ILO, Regional Office for Asia and the Pacific, 2014.

Such an approach should begin with the East and Southeast Asian countries. Once both the research structure and the remediation model have been well developed in this region, it could easily be replicated elsewhere. The Indian subcontinent (including Bangladesh, India and Sri Lanka) is another example. Networks are also needed in the countries of Central and South America (including Chile, Ecuador, Honduras and Nicaragua) which are becoming increasingly important suppliers of seafood products to the UK and other international markets, and eventually to the Pacific region.

The next question is how to identify the best global/international partners for initiatives of this kind. There are many actors with potential competence in this area, from international organisations through to human rights and environmental NGOs, and the diverse groups concerned with certification and social or environmental labelling. Organisations like the ILO (with its comparative advantage on labour standards) and the IOM (with both research and highly practical experience on assistance to, and protection of, migrant workers and trafficking victims) have been turning their attention more to social conditions in the fishing and seafood sectors. The Food and Agriculture Organisation (FAO) has sporadically published reports, for example a recent technical paper on employment conditions in aquaculture. There are also NGOs like Verité (with its high reputation for work on labour standards and social auditing). And many groups which had previously highlighted the environmental aspects of seafood sustainability are increasingly embracing the social dimensions (some through rankings, others through direct assistance to the seafood industry in addressing social and ethical concerns in their supply chains).

In moving forward, the seafood industry potentially has a multiple choice of partners, but has a strategic decision to take. Broadly speaking, there are two main options. *Either*, it can support the initiatives of the various NGOs and international organisations, buying into and benefiting from their activities as relevant to their core business. *Or* it can seek to exercise strategic leadership, identifying the priority activities over a fixed period of time, and then identifying the partners best equipped to support these activities, in different countries and regions, and in different thematic areas.

There are important precedents for the latter approach in other sectors, such as agriculture (cocoa and cotton), and particularly electronics. For example the California-based Electronic Industry Citizenship Coalition (EICC) attaches particular importance to forced labour and related concerns. The EICC was created in 2004 by a small group of electronic companies seeking to create an industry-wide standard on social, environmental and ethical issues in the electronics industry supply chain. The code draws on international norms and standards including those of the ILO. The current version has detailed reference to freely chosen employment, as well as other labour rights including working hours, wages and benefits. Assessment tools are provided to members, to help them understand the degree of implementation and the gaps. A Validated Audit Process, established in 2009, has now completed over a thousand audits and released its first comprehensive audit findings report. The audits are carried out by independent third party auditors, who are specially trained to detect protocol violations like forced labour and other labour rights violations such as excessive working area in areas with high migrant worker populations⁴⁷.

An important feature of the EICC model is the regular updating of its code of conduct, reflecting new problem areas that are detected through its practical experience. EICC has also increased its professionalism over the past decade,

⁴⁷ According to the EICC website, these training sessions are conducted by Verité several times a year.

originally staffed by volunteers, and now services by a substantial core secretariat. Early in 2015, the EICC issued a special position paper on forced labour, documenting its actions to combat the problems, and explaining the reasons for strengthening the forced labour provisions of its code. The recent changes included: being more specific on restrictions on worker freedom of movement; defining “excessive fees”; and adding requirements on issuing contracts at the time of hire, in the workers’ native language, before they leave their country of origin⁴⁸.

The EICC could be an important model for the seafood industry. As a first step it would be useful to convene an international workshop, bringing together key stakeholders from the industry-led initiatives in Thailand, with members of the EICC and similar coalition to discuss how to build an effective global structure, with built-in provisions for monitoring, auditing and review. The development of such a model would allow the seafood industry, over a period of time, to exercise global leadership on ethical approaches, documentation, remediation and responses.

7. SPECIFIC RECOMMENDATIONS

Specific recommendations are put forward under three headings. A first set of recommendations is directed generally, at all stakeholders who are concerned to promote ethics in seafood supply chains. A second set is directed at the seafood industry, particularly UK companies. A third set of recommendations is made to Seafish itself.

General recommendations

1. Knowledge base and data gaps

Despite the growing global concern with ethical issues in seafood supply chains, the knowledge base remains poor, and there are significant gaps in information beyond a small group of countries (mainly Thailand). This must be remedied as a matter of urgency.

A first priority is an indepth study on labour issues and abuse in DWF on Asian and Asian flagged vessels. Research needs to be carried out in both origin and destination countries for Asian migrant workers on DWF vessels. A project should be carried out by participating universities in sending and destination countries of the Asian region, perhaps in cooperation with an international organisation with specialist knowledge of the subject.

A second priority is a comparative study on working conditions in seafood processing plants. The regional profiles have highlighted a number of abusive recruitment and employment practices in both developing and developed countries in different continents. But the information tends to be anecdotal, and often dated. Given that many of these processed seafood products enter UK supply chains, an updated survey would be of considerable value to the UK seafood industry.

2. Supply chain transparency

Full transparency over the origin of all seafood products is of vital importance for ethical supply chain management. Existing approaches to confidentiality, for example

⁴⁸ *Working to Eradicate Forced Labor in the Electronics Supply Chain*, EICC, January 2015.

of customs information, can impede such transparency. Consideration also needs to be given to ways in which such information can be made more widely available.

3. A unified risk assessment tool

With the several ongoing initiatives to develop tools for assessing ethical risk in seafood (at the country, species or fishery levels), the time has come to consolidate these, make them mutually supportive and consistent and ensure only one tool exists for use by the seafood industry.

Recommendations for the seafood industry

4. A social code of conduct for the seafood industry

Seafood companies should now come together, working toward their own voluntary code of conduct for ethical practice. This report has referred to precedents in other industries, for example electronics. In the area of seafood, the model has to be the FAO Code of Conduct for Responsible Fisheries, adopted by the FAO Conference in 1995, which now enjoys very widespread acceptance in the seafood industry worldwide. The FAO code established now universally accepted principles on environmental concerns, and a similar initiative is warranted 20 years later in the social arena. The seafood industry needs to learn from this kind of experience, and see how the basic principles and monitoring mechanisms could be adapted to the specific circumstances and needs of the seafood industry. It is specifically recommended over the next six months to hold a technical meeting between interested seafood companies in the UK, and the Electronics Industry Citizenship Coalition (EICC) in the U.S., to set the ball rolling on this matter. Efforts should also be made to incorporate the key provisions of the ILO's Work in Fishing Convention (No. 188, 2007).

5. Sharing audit information

The seafood industry as a whole would benefit, if companies could find the means to share audit information in at-risk countries and regions. There are obvious issues of sensitivity and confidentiality, but agreement could hopefully be reached on the kind of information that could be shared, and the use that could be made of this. A technical meeting should be held on this subject in the near future, perhaps within the framework of the SECLG.

6. Joint reporting

The entry into force of the Modern Slavery Act and its transparency in supply chain provisions now means UK companies, within its financial threshold, are required to report on measures to prevent and eradicate slavery and slavery-like practices in supply chains. This can be seen as an important opportunity for the UK seafood industry to demonstrate global leadership on this subject, documenting the measures that have been taken jointly by the industry (perhaps most notably in Thailand) as well as by individual companies. While guidance on reporting will be issued by the UK Home Office, seafood companies can also exercise their own leadership. Consideration should be given to preparing a joint statement, before the end of the current financial year.

7. Ethical recruitment practices

Promoting fair recruitment practices, and curbing abuses including excessive fee-charging by labour brokers, are now issues of rising global concern in a wide range of industries. The ILO has launched its fair recruitment initiative with the participation of industry, trade unions and governments. The EICC has highlighted this concern for the electronics industry. And in Thailand, preparing a code of practice for labour brokerage has been one of the activities of the Shrimp Sustainable Supply Chain Task Force. This is a global concern for the seafood industry, given the widespread practice (in countries including the UK) of recruiting migrant fishers under special contractual conditions for work on fishing fleets. While this issue should be addressed in the code of conduct referred to above, it needs special attention. A comparative survey could be prepared on this issue in different major supplier countries to the UK market, preparing the ground for a technical meeting between recruitment and crewing/manning agencies and seafood companies.

Recommendations to Seafish

8. Regular update of then country/regional profiles

Fifteen such profiles were prepared as one output of this project. To be of practical value for the UK seafood industry, such profiles would need to be updated on a regular basis, and also assessed by the industry to see which aspects are of most relevance to their decision-taking. If considered useful, there will also be a demand for more such profiles. It is recommended that these profiles be updated at least once every six months.

9. Provision for international information sharing meetings

Meetings such as the one in Reykjavik referred to above were seen as highly useful by the UK seafood industry. They are also an opportunity to profile internationally what seafood companies are doing in the area of ethics, as well as learning from others. It is recommended that at least one such meeting is sponsored every year, targeting different areas of the world, and focusing on different thematic areas.

10. Further activities and resource implications

Seafish could potentially take a leading role with regard to several of the activities referred to above. It could commission and even coordinate the research required to fill important information gaps. It could contribute to further work on the thematic concerns identified, such as labour brokerage. To give greater national and international profile to its ethics stream of work, it could usefully prepare an annual report on activities in this area. But all of this would clearly have resource implications. As observed by one interlocutor from a supplier company, the UK is now importing ever more seafood, and this affects the role of an organisation like Seafish. The new focus on ethics, and the new emphasis in its mission statement on supporting a socially responsible future for the seafood industry, may require Seafish to consider an international perspective. If it is to meet this challenge, sufficient resources will need to be allocated to activities that will assist UK businesses operating at the global level.

ANNEX 1. BRIEFING NOTE AND QUESTIONS FOR THE SEAFOOD INDUSTRY

1. Aim of the project

The overall aim is to complete a detailed review of the ethical issues impacting on the UK seafood supply chain (including domestic landings and imports). For the purpose of this project, the term *ethics* is used for issues relating to labour and human rights. This includes in particular slavery, bonded and forced labour, child labour, and health and safety across the whole supply chain, either on land or at sea.

The project is envisaged as a starting point to gain an in-depth understanding of the issues and challenges to facilitate a proactive and forward looking approach to tackling these issues in the UK seafood supply chain. The Seafish Board and Industry panels have driven the inclusion of ethical issues as a key area of work for Seafish, and ethics is included in the Seafish corporate plan, 2015-2018. The work is expected to help inform ongoing and future Seafish work in this area.

2. Scope of the project

The project, implemented between March-July 2015, is broad in scope and includes:

- Seafood species landed into and imported into the UK, and ultimately sold to UK consumers, regardless of Seafish levy status
- All country suppliers to the UK market
- Wild caught and farmed species
- Different parts of the supply chain (e.g. vessels, farms, processors)
- Past and current issues, whether or not documented and raised in the media
- Horizon scanning and risk mapping for emerging and future issues (by country, species or supply chain)
- Knowledge gaps, where the evidence may be minimal or anecdotal
- Case study examples of improved practice
- Review of the organizations involved in these issues (including industry organizations, government agencies and NGOs), and their current relevant activities.

3. Purpose of consultations with industry: general issues and approach

As a first stage of the project, a literature review has now been completed. This covers the main published reports (by international organizations, NGOs, the media, some governments and academic bodies). It reviews some initiatives taken by industry, either alone or together with others (with a significant focus on Thailand, where much of the action has been so far). It also has some assessment of the various codes for fishing, aquaculture and marine ingredients (with their recent focus on social as well as environmental concerns).

Seafish has indicated that the approach to the project should involve discussions with members of the seafood industry, seafood industry groups and representatives, including members of the Seafood Ethics Common Language Group. The purpose is not so much to focus on company-specific issues and concerns (except when interlocutors may wish to identify cases of good practice), but rather to gain a general perspective from seafood industry representatives of the concerns and challenges ahead. In other words, the purpose is to put the consultant in the shoes of persons with a wealth of experience at different levels within the industry, and ensure that their views are reflected in the final report.

Given the nature of the project, it is preferred to keep the discussions fairly open ended, rather than to provide a detailed questionnaire. However, some industry

representatives have asked for specific questions in advance. Sample questions are provided below, to give some idea of the likely scope of the discussions. All the responses will be treated with the strictest confidence.

4. Specific questions

4.1 Overall framework

- What aspects of this project are of most direct relevance to your own work?
- How can the project best add practical value to the UK seafood industry?
- What are the main gaps if any in your knowledge?

4.2 Sourcing

- To what extent do you do your own risk mapping (obviously including prior supply chain audits), when sourcing new products?
- And to what extent do you rely on external information/actors?
- What external information and guidance tools are available on social issues, when sourcing seafood in new countries/regions? How useful are these?
- What if any are the main information gaps? How could these best be filled?
- What practical help do you feel you need to help deal with this issues?

4.3 Remediation, responses and partnerships

- If ethical concerns are detected by a company (or reported by others) in a supply chain, what are the options for response?
- Under what circumstances if any should a company cut off from a supplier?
- What are the criteria for differentiating between cases that require a “zero tolerance” response, and cases that call for active remediation?
- In the latter case, who are the best partners for addressing problems on the ground?
- What has been the experience with governments, international organizations and NGOs?
- What has been learned to date from the experience in Thailand, where there have been many examples of such partnerships?

4.4 Reporting

The UK Modern Slavery Act was adopted by Parliament in March this year. Its provisions on transparency in supply chains will require reporting by companies above a certain threshold on the measures taken to prevent and eradicate serious labour abuses encompassed by the term “modern slavery” in their supply chains. The new act (together with other trends such as the growing incorporation of social concerns in seafood industry codes of conduct, and also the media attention) will require more attention to reporting by companies and industrial bodies.

- Are you aware of the Modern Slavery Act?
- What are the implications for the seafood industry and companies in introducing a transparency clause?
- What provision has been made for such reporting?
- What assistance if any is required?
- Is it useful to think in terms of industry-wide reporting on issues of common concern? How could this best be achieved?

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*Our mission: supporting a profitable,
sustainable and socially responsible
future for the seafood industry*

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