

Human Trafficking and Other Labor Risks in the Fishing, Aquaculture, and Seafood Processing Sector

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Verité

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1. Introduction

1.1 Objective

This report provides an overview of the risks of human trafficking, including forced labor,¹ in the fishing, aquaculture, and seafood processing sector—referred to as the seafood sector in this report—around the world. In some cases, other serious labor abuses are also noted as indicators of the working environment and increased vulnerability to situations that may lead to forced labor.

The objective of the report is to raise awareness of the forms that forced labor may take in the seafood sector, the structural causes, and the combination of factors that may bind workers to their jobs. The intended audience for these findings includes government and industry actors seeking to strengthen their human rights due diligence approaches to manage the risks of forced labor, as well as workers and their advocates, civil society, and consumers.

While forced labor risks exist across the sector’s diverse production systems and supply chains, the focus of this report is on labor supply chains and the work done on fishing vessels and aquaculture sites, including in seafood processing facilities, often by migrant, sub-contracted, and otherwise vulnerable workers.

Seafood sector entities operate within an increasingly stringent regulatory environment that demands proactive measures to prevent human trafficking. Federal legislation such as the Trafficking Victims Protection Act, the Tariff Act of 1930, the Trade Facilitation and Trade Enforcement Act of 2015, the Countering America’s Adversaries through Sanctions Act, and the Uyghur Forced Labor Prevention Act, as well as relevant regulations like the Federal Acquisition Regulation and various state-level requirements, establish clear expectations for businesses to monitor and address trafficking risks within their operations and supply chains.

¹ Note: The United States recognizes two primary forms of trafficking in persons: forced labor and sex trafficking. For the purposes of this report, several terms are used such as “trafficking in persons,” “human trafficking,” and “forced labor.” In this report, these terms refer to a crime whereby traffickers exploit and profit at the expense of adults or children by compelling them to perform labor.

Seafood sector entities also face compelling business reasons to implement robust due diligence systems. The reputational damage from association with trafficking operations can result in immediate loss of contracts, particularly with government agencies and major corporations that have adopted zero-tolerance policies. Furthermore, the operational disruptions caused by trafficking-related investigations can significantly impact service delivery and customer relationships, while the financial costs of remediation and legal proceedings can be substantial.

Guiding frameworks used to benchmark practices and conditions relevant to this sector include, but are not limited to:

- ILO Convention 29 – Forced Labour Convention, 1930
- ILO Convention 105 – Abolition of Forced Labour Convention, 1957
- ILO Convention 138 – Minimum Age Convention, 1973
- ILO Convention 182 – Worst Forms of Child Labour Convention, 1999
- ILO Convention 188 – Work in Fishing Convention, 2007
- ILO Recommendation 199 – Work in Fishing Recommendation, 2007
- UN Convention on the Law of the Sea – UNCLOS, 1982
- UN Guiding Principles on Business and Human Rights, 2011
- OECD Guidelines for Multinational Enterprises
- OECD Due Diligence Guidance for Responsible Business Conduct, 2018

1.2 Scope

The seafood sector encompasses a wide range of activities including fishing, aquaculture production (such as fish, squid, shrimp, and shellfish farming), seafood processing and packaging, and associated logistics. The sector also includes companies engaged in the trading, exporting, and marketing of seafood products.

This report focuses on the recruitment, contracting, and management of labor on fishing vessels, aquaculture farms, and in seafood processing facilities. Transportation of seafood products is not covered here; for more information on transport and logistics broadly, see the Responsible Sourcing

Tool's [Transportation Sector report](#). Also see the [Fish](#) and [Shrimp](#) commodity reports for more information specific to those goods. Forced labor is a risk faced by any worker with one or more of the vulnerabilities discussed in this report and is prevalent in the seafood sector around the world. Attention is given to research indicating acute vulnerabilities faced by migrant, seasonal, and subcontracted workers, who are often exposed to deceptive recruitment, debt bondage, excessive working hours, retention of identity documents, and unsafe working and living conditions.

1.3 Context and Methodology

Many workers in the seafood sector worldwide work under exploitative and unsafe conditions. Fishing that takes place on vessels presents some unique hazards as it is one of the world's most dangerous occupations. Many fishers spend extended periods isolated on vessels far from shore, where poor communication and minimal oversight make it nearly impossible to seek help or report labor violations. The persistence of forced labor is well-documented, particularly within illegal, unreported, and unregulated fishing (IUU fishing), where oversight is weakest and labor protections are often absent.

Migrant fishers face the greatest vulnerability due to the recruitment systems that underpin the global fleet. Migrant workers² are also found in large numbers in seafood processing plants and face similar recruitment risks. These workers are recruited across borders through complex networks of brokers³ who impose heavy financial burdens in the form of recruitment fees, deposits, and other often hidden costs. The resulting debts are known to tie workers to their employers, leaving them unable to quit their jobs or challenge abuse. Coercion can take the form of withheld wages, manipulated debt, and violence or threats of violence. Structural issues such as the widespread use of flags of convenience (see 2.2 *Fishing* below), declining fish stocks requiring longer periods at sea, and cutting of labor costs intensify these risks for fishers.⁴ Not all abuse occurs while workers are physically at sea or in the workplace. For

² In this report, the term migrant worker refers to a person who migrates, or has migrated, from one country to another, with a view to being employed by someone other than him/herself, including any person regularly admitted, as a migrant for employment, and/or to seek temporary or permanent residence in another country. This definition is aligned with [ILO Convention C097 – Migration for Employment Convention \(Revised\), 1949](#) and the [U.S. Department of Homeland Security's Office of Homeland Security Statistics](#).

³ The combination of services provided by third parties to find, place, and/or directly contract labor to work in fishing-vessel operations or aquaculture operations are varied, as are the terms used by different regions and standards organizations to describe the providers. These include: crew brokers, manning agents, recruitment agents, sub-agents, labor providers, private employment agencies (PEAs), staffing agents, manpower agents, brokers, contractors, and crew leaders.

⁴ [Marschke, Melissa, and Peter Vandergeest. "Slavery Scandals: Unpacking Labour Challenges and Policy Responses within the Off-Shore Fisheries Sector." *Marine Policy* 68 \(June 2016\): 39–46.](#)

example, workers may experience coercive repayment demands, contract substitutions, or passport confiscation in their home countries or during transit, creating vulnerabilities that follow them throughout their employment.⁵

1.3.1 Risk Factors, Risk Indicators, and Analytical Framework

The seafood sector encompasses a wide spectrum of jobs, from relatively skilled and well-compensated technical or supervisory roles to low-skilled, low-paid, and physically demanding work. As in other global industries, certain groups of workers are more vulnerable to forced labor risks than others, primarily due to limited ability to refuse, leave, or report abusive employment conditions.

Verité’s research has found that the greatest risk of forced labor occurs at the intersection of worker vulnerability and employment practices, including recruitment, that exploit that vulnerability. Often overlapping categories of workers at this intersection include those in low-paid, low-skilled, and dirty, dangerous, and demeaning (“Three D”) jobs; contract workers hired through third-party intermediaries such as brokers or agents; migrant and seasonal workers; indebted workers or workers compelled by severe economic drivers; and workers under coercion by state or quasi-state entities.

This report examines both socio-demographic and employment practice-related **risk factors**, which contribute to worker vulnerability, and **risk indicators or signs** which help identify cases of forced labor. Risk factors and risk indicators have overlapping elements and causes. To help contextualize the many indicators highlighted by the research, Section 3 organizes them into the three most common **risk factors** that underlie them:

- The involvement of labor contractors, recruiters, agents, or other middlemen in the labor supply chain
- The presence of state-imposed labor programs
- Workers experiencing poverty, marginalization,⁶ and absence of alternative income options

[Christina Stringer, D. Hugh Whittaker, and Glenn Simmons, “New Zealand’s Turbulent Waters: The Use of Forced Labour in the Fishing Industry,” *Global Networks* 16, no. 1 \(January 2016\): 3–24.](#)

⁵ [Supang Chantavanich, Samarn Laodumrongchai, and Christina Stringer, “Under the Shadow: Forced Labour among Sea Fishers in Thailand.”](#)

⁶ The [ILO Global Guidelines on the Prevention of Forced Labour Through Lifelong Learning and Skills Development Approaches](#) notes that people most at risk of forced labor are those that are vulnerable and includes marginalization among the common

Research for this report identified and discusses the following **indicators** of forced labor in the seafood sector:⁷

- Deceptive or fraudulent recruitment (regarding the nature and terms of the job and/or the working and living conditions)
- Debt linked to recruitment practices
- Hazardous or degrading working conditions
- Onerous working hours or work schedule
- Degrading work-related living conditions
- Inability to terminate employment
- Physical and sexual violence
- Abuse of isolation
- Restrictions on workers' movement
- Retention of workers' personal documents
- Withholding of wages
- Abuse or manipulation of debt
- Abuse of vulnerability

characteristics of vulnerability, along with suffering discrimination on the grounds of age, ethnicity, disability, gender, migration status, race, religion, or sex, etc. leading to social and economic exclusion or marginalization.

⁷ The ILO Forced Labour Convention, 1930 (No.29), defines forced labor as “all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.” To support front line actors in the identification of situations of forced labor, ILO Indicators of Forced Labor - 2025 Revised Addition includes 11 of the most common signs observed in forced labor cases. They comprise situations that qualify as the menace of any penalty (also called coercion) and the absence of voluntary consent, or the ability to withdraw that consent, in other words the workers' freedom to leave the job. (To meet the threshold of forced labor, a situation must have some a *combination* of these two types of abuse.) The 11 indicators do not map exactly to the ILO 's earlier, more granular 2024 *Hard to See, Harder to Count: Handbook on Forced Labour Surveys*, which describes 22 circumstances commonly giving rise to involuntary work or qualify as forms of coercion. The list of indicators here are drawn from both these ILO documents as well as Verité' research for this report.

1.3.2 Sources of Information and Criteria for Inclusion

Sources of information for this report include a broad range of publicly available civil society publications, investigative journalism, academic research, and government documents. These materials were reviewed to identify credible accounts or documented allegations of labor exploitation across fishing, aquaculture, and seafood processing operations.

We note that the absence of documentation (e.g., research or investigative reports) pertaining to certain geographies or subsectors does not signify low risk or the absence of forced labor, and conversely, the existence of more evidence in certain contexts may reflect greater scrutiny rather than greater prevalence. Further, not all findings presented here meet the legal definition of human trafficking.⁸ Labor exploitation occurs along a continuum, from fair, safe, and legal work, in which employment is freely chosen, to situations characterized by a combination of involuntariness and coercion.⁹

2. Overview of the Seafood Sector

2.1 Background

The seafood sector is one of the world's fastest growing sectors and produces major commodities in global trade. Over 180 countries export fish and fishery products, and many developing nations rely heavily on this sector for export revenue.¹⁰ Recent analyses indicate that exports from developing economies now account for most of the value of global fishery trade. For example, a 2024 review found that the international fish export market is "predominantly shaped by developing countries," with China,

⁸ Note: The United States recognizes two primary forms of trafficking in persons: forced labor and sex trafficking. For the purposes of this report, several terms are used such as "trafficking in persons," "human trafficking," and "forced labor." In this report, these terms refer to a crime whereby traffickers exploit and profit at the expense of adults or children by compelling them to perform labor.

⁹ For operational forced labor indicators of involuntariness and coercion developed by the ILO, please refer to the International Labour Organization's [Hard to See, Harder to Count: Handbook on Forced Labour Surveys](#) (2024). The presence of an indicator alone does not necessarily confirm a legal finding of forced labor but signals elevated risk, especially when multiple indicators are present simultaneously.

¹⁰ [Elahi, Ehsan, Yuge Li, Ali Md Emam, Min Zhu, and Indubala Krishnan. "A systematic review of fish trade and its impact on economic progress: Barriers, opportunities, and outlook for developing countries." *Ocean & Coastal Management* 259 \(2024\): 107471.](#)

India, and other lower- and middle-income nations as major players.¹¹ Beyond trade, fisheries and aquaculture are essential for rural communities in many parts of the world. Fish are a critical source of animal protein in diets, especially in places where alternative protein sources are limited. The sector also provides employment and income in areas with few other economic options.¹²

2.2 Fishing

There is an especially heightened risk to fishers on distant water fishing vessels. Labor abuses in the distant water fishing sector occur within a broader context of weak governance and abuse of regulatory gaps. The prevalence of illegal fishing practices, systematic use of flags of convenience, and use of foreign crews all shape the conditions under which fishing workers are recruited and employed. These structural features combine with the physical isolation of work at sea, where vessels may remain beyond port for months or years through transshipment practices, to create conditions where workers have severely restricted freedom of movement and limited access to assistance or escape. Understanding these structural features of the industry is essential for contextualizing labor violations at sea.

In 2024, an estimated 20 percent of global catch came from IUU fishing.¹³ IUU fishing encompasses operations outside legal oversight, such as fishing without proper authorization, operating in closed zones, using banned gear, exceeding quotas, or targeting prohibited species. On the high seas (beyond coastal jurisdiction), enforcement is especially weak, allowing many IUU activities to take advantage of regulatory gaps. IUU fishing contributes to overfishing and weakening of fish stocks, making value chains more precarious. Driven by declining fish stocks in many fisheries, these vessels have expanded their capability to stay at sea for long periods of time, even up to several years. Rather than regularly docking, these vessels usually “transship” caught fish and fuel via smaller vessels.¹⁴ They thus have no regular access to port where fishers experiencing abuse would otherwise be able to escape, report abuse, or

¹¹ [Elahi, Ehsan, Yuge Li, Ali Md Emam, Min Zhu, and Indubala Krishnan. "A systematic review of fish trade and its impact on economic progress: Barriers, opportunities, and outlook for developing countries." *Ocean & Coastal Management* 259 \(2024\): 107471.](#)

¹² [Liu, Yaqin, Martin D. Smith, Joshua K. Abbott, David Dietz, Dustin Colson Leaning, Adam Smyth, and Tsugumi Yamashita. "The global seafood trade, embodied nutrients, and nutritional affordability." *Nature Communications* 16, no. 1 \(2025\): 5868.](#)

¹³ [United States Department of State. n.d. *Illegal, Unreported and Unregulated Fishing*.](#)

[Keating-Bitonti, Caitlin, and Anthony R. Marshak. 2024. *Illegal, Unreported, and Unregulated \(IUU\) Fishing: Frequently Asked Questions*. CRS Report No. R48215. Washington, DC: Congressional Research Service.](#)

¹⁴ [Selig, E.R., Nakayama, S., Wabnitz, C.C.C. et al. Revealing global risks of labor abuse and illegal, unreported, and unregulated fishing. *Nat Commun* 13, 1612 \(2022\).](#)

seek assistance.¹⁵ Vessels on the high seas are generally regulated by their flag states, the country in which they are registered. The practice of flying flags of convenience, that is, registering in states that often lack enforcement capacity and/or robust rule of law, continues to be a widely recognized loophole in fisheries governance.¹⁶ These arrangements can undermine accountability, as some flag states do not exercise meaningful oversight of vessels operating under their registry.¹⁷ The structural weaknesses in oversight have intensified environmental and social risks.

More recent efforts to counter IUU fishing include enhanced monitoring and a push for reforms in ownership transparency of vessels and flag states.¹⁸ However, enforcement remains under-resourced around the world. For instance, in 2025, according to the Department of Homeland Security's Inspector General, the U.S. Coast Guard reported interdicting only 21 percent of vessels it had detected, citing insufficient resources.¹⁹

The remoteness inherent in work on a vessel tends to restrict workers' freedom of movement and access to grievance reporting and remedy. While aboard vessels, fishers rarely have access to means of communication with the outside world. They are typically out of reach of cell phone communication and barred from using other on-board communication devices such as radios or satellite phones. This is exacerbated when vessels are at sea for excessively long periods, using strategies such as transshipment, as mentioned above.

A study published in 2025 found that ownership of distant-water fishing vessels is concentrated in a small group of countries. Eighteen nations, including Taiwan, Italy, Spain, France, and China, account for most recruitment of foreign crew, drawing workers from 52 source countries such as Indonesia, the

¹⁵ [Selig, E.R., Nakayama, S., Wabnitz, C.C.C. et al. Revealing global risks of labor abuse and illegal, unreported, and unregulated fishing. *Nat Commun* 13, 1612 \(2022\).](#)

¹⁶ [Federal Maritime Commission. 2025. "Investigation into Flags of Convenience and Unfavorable Conditions Created by Certain Flagging Practices." *Federal Register* 90, no. 99 \(May 22, 2025\): 21926–21929.](#)

¹⁷ [Federal Maritime Commission. 2025. "Investigation into Flags of Convenience and Unfavorable Conditions Created by Certain Flagging Practices." *Federal Register* 90, no. 99 \(May 22, 2025\): 21926–21929.](#)

¹⁸ [Bai, Yanbing, Siao Li, Rui-Yang Ju, Zihao Yang, Jinze Yu, and Jen-Shiun Chiang. 2024. "FAD-SAR: A Novel Fishing Activity Detection System via Synthetic Aperture Radar Images Based on Deep Learning Method."](#)

[Oceanology International. 2024. "Tech vs. Threat: Innovative Solutions to Combat IUU Fishing." June 5, 2024.](#)

[Wold, Chris. 2025. "Incentivising Change to Beneficial Ownership and Open Registers: Holding Flag States Responsible for Their Fleets and Costs of Illegal Fishing." *SSRN Electronic Journal*.](#)

¹⁹ [United States Department of Homeland Security. Office of Inspector General. June 6, 2025.](#)

Philippines, Madagascar, and Kiribati.²⁰ Network analysis shows clear regional patterns: East Asian fleets mainly employ workers from Southeast and South Asia, while Western European fleets tend to hire from African and some European countries.²¹

2.3 Aquaculture

As overfishing has constrained growth in many wild fisheries, aquaculture is now playing a larger role in meeting global demand for aquatic foods. In 2022, aquaculture production of aquatic animals overtook wild capture fisheries for the first time, accounting for just over 50 percent of combined aquatic animal output.²² Aquaculture can be carried out in a wide range of inland and coastal settings, using both land-based systems and open-water structures to raise aquatic species. While aquaculture does not directly deplete wild stocks, it brings other environmental and social risks. Aquaculture work is often hazardous, and workers can experience drowning, electrocution, chemical exposure, and injury from machinery and equipment.²³ Intensification can lead to nutrient pollution, chemical use (antibiotics, pesticides), disease spread, genetic interbreeding or disease transfer to wild populations, habitat conversion (e.g., mangroves), and effluent discharge into adjacent waters.

2.4 Supply Chain

2.4.1 Wild Capture Fishing

Wild capture fishing involves harvesting fish and shellfish from oceans, rivers, and lakes using vessels that range from small artisanal boats to large industrial fleets. The supply chain begins at sea, where fishers use different methods to catch, sort, and preserve their catch, often using ice or onboard refrigeration. Once landed, the catch is transferred to landing sites, ports, or collection centers, where,

²⁰ [Tsai, Chi-Heng, MoSiao Fang, and Gohar Petrossian. "Netting the global workforce: Unraveling the networks of laborers on distant water fishing fleets." *Marine Policy* 181 \(2025\): 106823.](#)

²¹ [Tsai, Chi-Heng, MoSiao Fang, and Gohar Petrossian. "Netting the global workforce: Unraveling the networks of laborers on distant water fishing fleets." *Marine Policy* 181 \(2025\): 106823.](#)

²² United Nations Food and Agriculture Organization. [Aquaculture production](#)

²³ [National Institute for Occupational Safety and Health \(NIOSH\). "Aquaculture." Centers for Disease Control and Prevention. Last modified January 3, 2024.](#)

[Melvin L. Myers and Robert M. Durborow, "Aquacultural Safety and Health," in *Aquaculture*, ed. Zainal Muchlisin \(Rijeka, Croatia: IntechOpen, 2012\).](#)

depending on the value or use of the species, it may be sold to traders, cooperatives, markets, or processing facilities.²⁴

Processing plants convert raw fish into a variety of products, including canned, frozen, smoked, or dried items, as well as fresh fillets. Some fish undergo multiple rounds of processing, while others—particularly live shellfish—are sent directly to markets or distributors. From processors, products move to wholesalers who handle distribution to retailers, restaurants, and export markets.

2.4.2 Aquaculture

Aquaculture involves cultivating fish, crustaceans, and aquatic plants in controlled environments such as ponds, tanks, or enclosed coastal waters. The aquaculture supply chain typically includes several interconnected stages: hatcheries that produce juvenile stock, feed manufacturers, farms that raise the species to market size, processing facilities, input suppliers, and final buyers. Hatcheries and feed producers provide the foundational inputs that determine productivity and quality, while farms manage daily operations such as feeding, water quality, and harvesting.²⁵

After harvest, products are sorted, cleaned, and transported through cold storage and distribution networks to processing plants or wholesale markets. Processing often involves tasks such as filleting, freezing, or packaging. Finished products are then moved into domestic and international markets through wholesalers and exporters and ultimately reach consumers through retail outlets.²⁶

2.5 Labor Supply Chain Characteristics

2.5.1 Use of Labor Recruiters

Labor supply chains in the seafood sector are complex, opaque, and frequently involve multiple intermediaries. In both wild capture and farmed production, workers are often recruited and managed through layers of brokers and subcontractors.²⁷

²⁴ [Reef Resilience Network. "Structure of Seafood Supply Chains." Reef Resilience Network, 2026.](#)

²⁵ [Reef Resilience Network. "Structure of Seafood Supply Chains." Reef Resilience Network, 2026.](#)

²⁶ [Reef Resilience Network. "Structure of Seafood Supply Chains." Reef Resilience Network, 2026.](#)

²⁷ ["How the Seafood Task Force is pioneering responsible recruitment for the seafood industry Seafood Task Force." Seafood Task Force, N.d.](#)

In fishing, recruitment frequently occurs through informal networks or licensed brokers who supply crew to vessel owners or skippers (boat captains). As described in greater detail in Section 3.1 below, these intermediaries often charge recruitment fees, deduct wages for “placement” or travel costs, or maintain control of worker documents, creating situations that may result in debt bondage and restricted mobility. Fishers may also be paid on a “catch share” basis, creating uncertainty in earnings and dependence on the vessel operator for loans, food, shelter, and repatriation.

In aquaculture, farms often rely on subcontracted labor for pond construction, fish feeding and harvesting, and maintenance. These workers are commonly supplied by small labor agencies or local brokers who manage large numbers of temporary or migrant workers with little oversight. In processing and packing facilities, outsourced or agency labor is common, especially during peak seasons, blurring lines of responsibility for working conditions and pay.

2.5.2 Jobs and Workforce Characteristics

The seafood sector is highly labor intensive, requiring a large number of workers. In 2020, the United Nations Food and Agriculture Organization (FAO) estimated that over 58 million people were involved in fishing and aquaculture.²⁸ Over 84 percent of those involved in the sector are in Asia, with an additional ten percent in Africa.²⁹ Although the majority of workers in the wild capture fish sector are men, the sector also provides livelihood for women, who represent an estimated 21 percent of all workers engaged in fishing and aquaculture, and up to 85 percent of workers in secondary activities such as processing.³⁰

The seafood sector includes a broad range of job types that vary by skill level, work environment, and employment arrangement. In wild capture fisheries, work typically takes place on vessels of varying sizes ranging from small, nearshore artisanal boats to large, industrial, distant water vessels that operate for weeks or months at sea. Common roles include deckhands, skippers, mates, engineers, galley crew members, on-board factory crew on larger industrial vessels, and boat maintenance workers.³¹

[“A study into the implementation of responsible recruitment practices and the Employer Pays Principle \(EPP\) in the global tuna processing sector.” Impactt, Feb 2025.](#)

²⁸ [United Nations Food and Agriculture Organization.](#)

²⁹ [United Nations Food and Agriculture Organization.](#)

³⁰ [United Nations Food and Agriculture Organization.](#)

³¹ [“Careers on Fishing Vessels.” Seafish, 2026.](#)

Deckhands are typically responsible for most hands-on fishing work. Tasks are physically demanding and often involve long hours, exposure to extreme weather, and risks associated with hazardous seas, heavy equipment, fatigue, and limited safety oversight.

In aquaculture, work occurs on coastal or inland farms that cultivate fish, shrimp, or shellfish. Most day-to-day operations are handled by general farm workers and managers. More technical areas, such as hatchery management, fish health and veterinary care, lab work, or engineering, are typically staffed by trained specialists with advanced expertise. Lower-skilled tasks include feeding and harvesting stock, maintaining cages and ponds, monitoring water quality, processing harvested fish, and packing for transport. Such work can involve manual tasks such as feeding, harvesting, cleaning cages or ponds, and maintaining equipment. Aquaculture workers are at risk of not just common injuries but of workplace fatalities resulting from such hazards as electrocution, drowning, and head injuries³² (see 3.3.2 *Hazardous Work* below).

After harvest, both wild capture and farmed products move into processing. This stage may take place in small informal settings or large industrial facilities. Common activities include sorting, cleaning, filleting, grading, freezing, drying, smoking, and packaging. Processing work is often fast-paced and physically repetitive, performed in cold, wet, or poorly ventilated environments that may pose health and safety risks.

The workforce includes a mix of local and migrant labor, with many workers recruited across borders or from rural areas with few livelihood alternatives. In some countries, entire families, including women and children, participate in pre- and post-harvest work such as net mending, cleaning, drying, or sorting of fish.

Key features of the sector's workforce include:

- Significant use of migrant, temporary, and informal workers, often recruited through third-party agents or crew brokers.
- Low unionization and weak representation, particularly in small-scale and informal operations.

³² ["Aquaculture Workers." National Center for Farmworker Health, 2025.](#)

- Limited access to grievance mechanisms or social protections, especially for undocumented (illegal) or non-national workers.

3. Forced Labor and Other Labor Rights Risk Factors Associated with the Seafood Sector

The United States Department of State's 2025 *Trafficking in Persons Report* noted either evidence of or the risk of³³ human trafficking (including forced labor) in the fishing and/or aquaculture sector in the following 50 countries: Angola, Bangladesh, Belize, Burundi, Cabo Verde, Cameroon, Comoros, Costa Rica, Ecuador, Finland, France, Gabon, Ghana, Guatemala, Guinea, Guinea-Bissau, Haiti, Indonesia, Ireland, Jamaica, Japan, Latvia, Maldives, Marshall Islands, Mexico, Micronesia, Moldova, Mongolia, Netherlands, New Zealand, Norway, Pakistan, Palau, Papua New Guinea, Peru, Philippines, Poland, Portugal, Singapore, Solomon Islands, South Korea, Spain, Suriname, Taiwan, Thailand, Timor-Leste, United Kingdom, Uruguay, Vanuatu, and Vietnam.

The following sections discuss common factors, also called drivers, and employment practices identified across many geographic locations, including the countries listed above, where risks and situations of forced labor in the seafood sector have been identified. These factors and practices are often interrelated and can compound each other, with vulnerable groups like migrant workers, for example, being particularly prone to exploitation.

3.1 Involvement of Labor Contractors, Recruiters, Agents, or Other Middlemen in the Labor Supply Chain

Labor recruitment in the seafood sector is frequently mediated by third-party brokers, agents, or labor contractors, particularly in large-scale commercial operations. These intermediaries play a central role in sourcing, placing, and managing workers (especially migrant workers who make up a large share of the fishing and aquaculture workforce) across fishing vessels, aquaculture farms, and seafood processing facilities. Migrant workers are commonly recruited from regions with limited livelihood options and fill roles that local workers are unwilling or unable to take due to low pay, difficulty, hazards, and

³³ Risk of or vulnerability to forced labor in the construction sector, as opposed to documented evidence of forced labor, is indicated by the inclusion of "(risk)" following the country in which the risk or vulnerability was reported.

isolation,³⁴ as discussed in the examples below. Labor brokers therefore commonly operate within layered subcontracting arrangements that link workers in rural or economically marginalized areas to commercial seafood operations. These recruitment systems can involve transnational networks as well as local sub-agents. For example, a potential worker in Indonesia or Thailand might work with a recruiting agent operating in their village, as well as a larger agent with relationships to owners of Chinese-flagged squid trawling vessels, with each agent requiring their own fees.³⁵

Control over recruitment, job placement, and related financial arrangements is often concentrated within these intermediary systems, making broker-mediated recruitment a significant driver of forced labor risk in the sector. Documented practices include deceptive recruitment regarding job terms and conditions, recruitment-related fees, debt linked to recruitment practices, and contract substitution. Aside from debt, a hallmark of many migrant workers' experience in the sector is the precariousness of their employment and residency status. Their recruitment and employment is often tied to a specific vessel owner or employer; expressing grievances could mean they are deported without means to repay any debt incurred. These practices can increase workers' dependence on brokers or employers and limit their ability to refuse work or leave abusive conditions. While these dynamics affect both migrant and non-migrant workers, cross-border recruitment may further intensify vulnerability in some contexts. The following subsections describe two common mechanisms through which broker-mediated recruitment contributes to forced labor risk: deception in recruitment and the accumulation and manipulation of worker debt.

3.1.1 Deception in Recruitment

Deception in the recruitment process (i.e., fraudulent recruitment) is widely reported; it can take multiple forms and can start with initial recruitment conversations. Some workers are told they will be employed in land-based industries like factory work, manufacturing, or general labor, only to discover that they have been assigned to fishing vessels.³⁶ Others are promised wages, hours, or conditions that

³⁴ [Chihoko Asada-Miyakawa. "Advancing Labour Rights for Migrant Fishing and Seafood Processing Sector Workers in ASEAN." The ASEAN Magazine, 28 Jun 2023.](#)

³⁵ ["Bright Lights Dim Prospects: The urgent need to address unregulated squid fishing in the Southwest Atlantic to avert a looming environmental crisis." Environmental Justice Foundation.](#)

³⁶ ["Blood and Water: Human Rights Abuse in the Global Seafood Industry." Environmental Justice Foundation, 2019.](#)

["Seabound: The Journey to modern slavery on the high seas." Greenpeace, 2019.](#)

turn out to be false. Contract terms may be changed without worker agreement; many contracts are written in a language workers do not understand and many workers do not receive a signed copy or any contract at all.

3.1.2 Fees and Worker Debt

Fees and expenses accumulate throughout the recruitment process, particularly when third-party recruiters are used. To cover these costs, workers may sell possessions or borrow from local networks or lenders (often connected to the broker) using family assets as collateral. Amounts owed are often deducted from wages after employment begins. In some cases, wages are received directly by the recruiter instead of the worker. In some arrangements, the vessel owner pays the broker a lump sum for each worker supplied, and the worker is then expected to earn back that cost through labor. The combined effect is the creation of debt that can take months or years to repay and, in worst cases, the inability of a worker to leave the job regardless of illegal, unsafe, or abusive conditions.

3.1.3 Illustrative Case: Thailand

Migrant workers in Thailand's seafood industry continue to face severe and systemic exploitation, including situations of forced labor.³⁷ A 2024 report from the U.S. Department of Labor described forced labor among vessel-based fishers in Thailand that was rooted in exploitative recruitment and debt-based coercion, especially affecting migrant workers from Cambodia and Myanmar.

Many fishers interviewed during the research obtained their jobs through informal brokers or labor agents in their home countries, who charged recruitment or "service" fees that workers could rarely afford upfront. Many took out loans from the same brokers or from local lenders to cover these costs, entering Thailand already indebted. Once workers were placed on boats, their debts were often transferred to vessel owners or captains, who manipulated repayment terms and added deductions for food, equipment, or small advances. The result was a cycle of debt bondage in which workers' earnings

["Recruitment Practices and Migrant Labor Conditions in Nestlé's Thai Shrimp Supply Chain: An Examination of Forced Labor and other Human Rights Risks Endemic to the Thai Seafood Sector." Verité, 2015.](#)

["Seafood Obtained via Illegal, Unreported, and Unregulated Fishing: U.S. Imports and Economic Impact on U.S. Commercial Fisheries." United States International Trade Commission, 2021.](#)

["Forced Labor and the Seafood Supply Chain." NOAA Fisheries, 2024.](#)

³⁷ ["Supply Chain Study on Forced Labor in the Fishing Industry of Thailand." United States Department of Labor, Sept 2024.](#)

were too low to cover expenses, leaving them dependent on employers and unable to leave.³⁸ Many fishers continued working through pain or exhaustion for fear of losing wages or being deported before repaying debts. In one case documented in the study, a small personal loan of THB 1,000 grew seventy-fold over three years due to interest charged by a supervisor.³⁹

3.1.4 Illustrative Case: Taiwan

Taiwan operates one of the world's largest distant-water fishing fleets, and much of its labor force consists of migrant workers from Indonesia and the Philippines. Most workers are recruited through licensed labor brokers in their home countries who coordinate with Taiwanese recruitment agencies. These intermediaries charge placement fees that can exceed several months' wages and often require workers to sign debt agreements or surrender personal documents before departure.⁴⁰ Once the worker reaches Taiwan, the broker and/or vessel owner control the employment relationship. They may write contracts in languages most recruits cannot read, and add clauses that limit the worker's ability to change employers.⁴¹ They often forbid workers from transferring to another vessel without returning to their home country, paying new agency fees, and securing the approval of both governments, requirements that make any transfer nearly impossible for workers.⁴² Recruitment and employment structures for these workers operate under a separate regulatory system managed by Taiwan's Fisheries Agency rather than the Ministry of Labor. As a result, distant-water fishers are excluded from the Labor Standards Act, which protects other workers in Taiwan. They are not entitled to minimum wage, overtime pay, health insurance, or legal grievance mechanisms. At sea, oversight is minimal. Workers report shifts lasting up to 20 hours, inadequate food and water, withheld wages, and denial of medical

³⁸ ["Supply Chain Study on Forced Labor in the Fishing Industry of Thailand." United States Department of Labor, Sept 2024.](#)

³⁹ ["Supply Chain Study on Forced Labor in the Fishing Industry of Thailand." United States Department of Labor, Sept 2024.](#)

⁴⁰ ["Silenced voices: Human rights risks hidden in the opaque tuna supply chain from Taiwanese fishing vessels to the Japanese market." Human Rights Now & Taiwan Association for Human Rights, 2025.](#)

[Cheung, Eric. "Taiwan Is Held Up as a Bastion of Liberal Values. But Migrant Workers Report Abuse, Injury and Death in Its Fishing Industry." CNN, 12 Jul 2025.](#)

⁴¹ ["Silenced voices: Human rights risks hidden in the opaque tuna supply chain from Taiwanese fishing vessels to the Japanese market." Human Rights Now & Taiwan Association for Human Rights, 2025.](#)

[Cheung, Eric. "Taiwan Is Held Up as a Bastion of Liberal Values. But Migrant Workers Report Abuse, Injury and Death in Its Fishing Industry." CNN, 12 Jul 2025.](#)

⁴² ["Silenced voices: Human rights risks hidden in the opaque tuna supply chain from Taiwanese fishing vessels to the Japanese market." Human Rights Now & Taiwan Association for Human Rights, 2025.](#)

[Cheung, Eric. "Taiwan Is Held Up as a Bastion of Liberal Values. But Migrant Workers Report Abuse, Injury and Death in Its Fishing Industry." CNN, 12 Jul 2025.](#)

treatment after injury. Some workers remain on vessels for months or more than a year without the ability to return home.⁴³

3.1.5 Illustrative Case: United Kingdom

A 2022 study described indicators of forced labor among migrant fishers from countries including the Philippines, Ghana, Indonesia, Sri Lanka, and India working on UK-flagged vessels.⁴⁴ These workers are routinely recruited through labor brokers in the home countries, often unlicensed, who charge high placement fees that leave workers indebted before departure.⁴⁵ Most migrants enter on *transit visas* that prohibit them from legally working in UK waters and tie them to a single vessel and employer. This visa arrangement forces them to live onboard for the duration of 10–12-month contracts and effectively prevents them from seeking help or changing jobs. Many fishers work 16–20-hour days without adequate rest, earn a fraction of domestic crew wages, and face threats, withheld pay, and occasional physical or sexual violence.⁴⁶ Because the visa structure criminalizes their presence onshore, migrant crew have limited opportunities to report abuse.⁴⁷

3.1.6 Illustrative Case: Southwest Atlantic

A 2025 investigation found that the Southwest Atlantic squid fleet relies heavily on migrant workers, primarily from Indonesia and the Philippines, who are recruited through labor brokers and intermediaries and then placed on Chinese, Taiwanese, and South Korean vessels.⁴⁸ Workers commonly incur significant recruitment fees or provide “guarantee money,” creating debt that limits their ability to

⁴³ [“Silenced voices: Human rights risks hidden in the opaque tuna supply chain from Taiwanese fishing vessels to the Japanese market.” Human Rights Now & Taiwan Association for Human Rights, 2025.](#)

[Cheung, Eric. “Taiwan Is Held Up as a Bastion of Liberal Values. But Migrant Workers Report Abuse, Injury and Death in Its Fishing Industry.” CNN, 12 Jul 2025.](#)

⁴⁴ [Decker Sparks, Jessica L. “Letting Exploitation Off the Hook? Evidencing Labour Abuses in UK Fishing.” Nottingham: Rights Lab, University of Nottingham, 2022.](#)

⁴⁵ [Decker Sparks, Jessica L. “Letting Exploitation Off the Hook? Evidencing Labour Abuses in UK Fishing.” Nottingham: Rights Lab, University of Nottingham, 2022.](#)

⁴⁶ [Decker Sparks, Jessica L. “Letting Exploitation Off the Hook? Evidencing Labour Abuses in UK Fishing.” Nottingham: Rights Lab, University of Nottingham, 2022.](#)

⁴⁷ [Decker Sparks, Jessica L. “Letting Exploitation Off the Hook? Evidencing Labour Abuses in UK Fishing.” Nottingham: Rights Lab, University of Nottingham, 2022.](#)

⁴⁸ [“Bright Lights Dim Prospects: The urgent need to address unregulated squid fishing in the Southwest Atlantic to avert a looming environmental crisis.” Environmental Justice Foundation.](#)

leave.⁴⁹ Workers reported being required to work on different vessels or under different terms than promised in their contracts, along with unexpected wage deductions and withholding of pay.⁵⁰ Identity documents such as passports and seafarer books are routinely confiscated by senior crew. Further, crew interviews describe physical violence (hitting, punching, kicking), intimidation, and threats of being sent home. In some cases, workers reported being physically prevented from leaving the ship.⁵¹

3.2 State-Imposed Forced Labor

State-imposed forced labor is distinct in the seafood sector, with coercion organized or enabled at the state level rather than emerging solely from private recruitment or vessel practices. These systems often involve formal labor-deployment programs, politically driven labor-export arrangements, or state-imposed constraints on workers' movement, communication, or earnings.

3.2.1 Illustrative Case: North Korea and China

The Environmental Justice Foundation's 2025 *Trapped at Sea* report documents extensive evidence of North Korean forced labor aboard Chinese tuna longlining fishing vessels operating in the Indian Ocean. Interviews with Indonesian and Filipino crew members revealed that North Koreans were working on at least a dozen Chinese-flagged vessels, in direct violation of UN sanctions prohibiting the export of North Korean labor. Crew testimonies and video evidence describe North Korean workers living under severe restrictions, being denied communication, freedom of movement, or contact with authorities and enduring extreme fatigue, injury, and isolation.⁵² These workers reportedly spent years at sea without returning to land, routinely transferred between vessels to avoid detection by port authorities.⁵³ Captains and vessel owners allegedly concealed their presence during port calls, suggesting deliberate

⁴⁹ ["Bright Lights Dim Prospects: The urgent need to address unregulated squid fishing in the Southwest Atlantic to avert a looming environmental crisis." Environmental Justice Foundation.](#)

⁵⁰ ["Bright Lights Dim Prospects: The urgent need to address unregulated squid fishing in the Southwest Atlantic to avert a looming environmental crisis." Environmental Justice Foundation.](#)

⁵¹ ["Bright Lights Dim Prospects: The urgent need to address unregulated squid fishing in the Southwest Atlantic to avert a looming environmental crisis." Environmental Justice Foundation.](#)

⁵² ["Trapped at Sea: Exposing North Korean Forced Labour on China's Indian Ocean Tuna Fleet." Environmental Justice Foundation, 2025.](#)

⁵³ ["Trapped at Sea: Exposing North Korean Forced Labour on China's Indian Ocean Tuna Fleet." Environmental Justice Foundation, 2025.](#)

evasion of international law.⁵⁴ The investigation also found that several of the implicated vessels were listed as authorized exporters to the European Union and the United Kingdom, indicating possible entry of seafood caught with forced labor into major consumer markets.⁵⁵

Workers from North Korea are also exploited in on-land seafood processing facilities in China.⁵⁶ A 2024 New Yorker article described how thousands of primarily female North Koreans work in seafood-processing plants in Chinese cities such as Dandong and Dalian, peeling shrimp, packaging fish, and processing other forms of seafood, including squid.⁵⁷ They live under constant surveillance by North Korean minders, confined to locked dormitories, and work shifts of up to sixteen hours in silence and exhaustion.⁵⁸ Nearly all of their wages are confiscated by handlers and funneled to the North Korean government, in direct violation of international sanctions. Workers who resist face beatings, sexual violence, and threats of execution. There is evidence that seafood products from these facilities are exported to global supply chains.⁵⁹

3.3 Workers Experiencing Poverty, Marginalization, and a Lack of Social Capital or Opportunity

Conditions and structure of work in the fishing and aquaculture sector can vary significantly depending on various contextual factors like the type of fishing performed, geographic region, and local norms. Work in the sector is often characterized by informality and instability. Many workers depend on variable catches, weather, and fluctuating market prices for income, leaving them exposed to financial risk and debt. Most do not have written contracts and are not covered by labor protections or social safety nets. In many coastal and inland communities, geographic isolation, weak infrastructure, and limited economic opportunities leave workers with few options beyond fishing, which is poorly paid and hazardous.⁶⁰ The following sections describe factors that increase workers' vulnerability to exploitation.

⁵⁴ ["Trapped at Sea: Exposing North Korean Forced Labour on China's Indian Ocean Tuna Fleet." Environmental Justice Foundation, 2025.](#)

⁵⁵ ["Trapped at Sea: Exposing North Korean Forced Labour on China's Indian Ocean Tuna Fleet." Environmental Justice Foundation, 2025.](#)

⁵⁶ [Urbina, Ian. "Inside North Korea's Forced-Labor Program in China." The New Yorker, February 25, 2024.](#)

⁵⁷ [Urbina, Ian. "Inside North Korea's Forced-Labor Program in China." The New Yorker, February 25, 2024.](#)

⁵⁸ [Urbina, Ian. "Inside North Korea's Forced-Labor Program in China." The New Yorker, February 25, 2024.](#)

⁵⁹ [Urbina, Ian. "Inside North Korea's Forced-Labor Program in China." The New Yorker, February 25, 2024.](#)

⁶⁰ [Hidden Harvest: The Global Contribution of Capture Fisheries. World Bank, May 2012.](#)

3.3.1 Informality, Debt, and Dependency

Informality and dependency on an employer create conditions in which exploitation can flourish. Workers often rely on vessel owners, captains, or middlemen for employment, credit, food, or equipment, allowing these actors to exercise significant control over their livelihoods. On small boats, employment relationships are predominantly casual and may be based on traditional relationships such as patronage, leading workers to be highly dependent on their boss.⁶¹ Pay advances resulting in indebtedness, “share” payment systems, and verbal-only employment agreements obscure what actual earnings will be, making it difficult for workers to leave or contest unfair treatment. Many are excluded from minimum wage protections, workers’ compensation, and mechanisms for redress.⁶² The hierarchical structure aboard vessels, combined with isolation, enables exploitive practices including limited rest time, physical and verbal abuse, and threats of non-payment.

3.3.2 Hazardous Work

Fishing is identified by the International Labour Organization (ILO) as one of the world’s most hazardous occupations; in many contexts, the lowest paid, most vulnerable jobs are taken on by those without other viable livelihood options. Fishers routinely face extreme weather and limited access to medical care at sea. They work on slippery decks, sometimes without gear (e.g. boots, gloves) to protect them against the elements, cuts, and other injuries and often handle heavy or malfunctioning machinery, nets, hooks, and knives in confined spaces. Long hours, inadequate sleep, poor sanitation, limited fresh water, and spoiled food are common. Illness or injury at sea is difficult to treat.⁶³ According to the U.S. Centers for Disease Control and Prevention, in recent years, most deaths on U.S. commercial fishing vessels resulted from contact with fishing gear or machinery (about 40 percent), while others were

⁶¹ ["Research on Indicators of Forced Labor in the Supply Chain of Fish in Indonesia: Platform \(Jermal\) Fishing, SmallBoat Anchovy Fishing, and Blast Fishing." Verité, 2012.](#)

["Caught at Sea: Forced Labour and Trafficking in Fisheries." ILO, 2013.](#)

⁶² ["Research on Indicators of Forced Labor in the Supply Chain of Fish in Indonesia: Platform \(Jermal\) Fishing, SmallBoat Anchovy Fishing, and Blast Fishing." Verité, 2012.](#)

["Research on Indicators of Forced Labor in the Supply Chain of Tuna in the Philippines." Verité, 2012.](#)

["Caught at Sea: Forced Labour and Trafficking in Fisheries." ILO, 2013.](#)

⁶³ ["Fishing Safety: Occupational Hazards." Food and Agriculture Organization of the United Nations.](#)

["Recruitment and Hiring Practices in the Philippine Tuna Handline Fishing Sector." Verité, 2020.](#)

["Caught at Sea: Forced Labour and Trafficking in Fisheries." ILO, 2013.](#)

caused by falls, electrocution, or exposure to toxic or oxygen-deficient environments. More than one-third of fatalities were non-operational incidents—such as suicides, homicides, or accidental drug overdoses, highlighting the potentially severe physical and psychological risks associated with commercial fishing work.⁶⁴

While less attention has been paid to labor in aquaculture, it is also often hazardous. Aquaculture work has been linked to fatal events such as drowning, electrocution, crushing injuries, toxic gas exposure, and severe head trauma, as well as non-fatal injuries from falls, machinery, lifting, chemicals, and fire.⁶⁵ Contributing factors include unstable or powerful equipment, hazardous environmental conditions, inadequate training or safety gear, and exposure to sharp fish parts, cold temperatures, and infectious agents.⁶⁶ It should be noted that there is likely an underreporting of health and safety risks—and potentially of other social issues—in aquaculture specifically as incidents are typically subsumed in reporting and data on related sectors such as agriculture or fishing.⁶⁷

Fish and shrimp processing workers also face exposure to hazardous work conditions. The work involves repetitive physical tasks such as cutting and packing fish; workers are often in cold, wet environments with heavy machinery and slippery floors. These conditions result in musculoskeletal injuries, falls, and cuts from sharp tools or equipment. Many facilities also have high noise levels and poor ventilation, increasing the likelihood of hearing loss or respiratory problems.⁶⁸ The work is frequently performed under intense time pressure during peak harvesting seasons, when long shifts and fatigue become additional safety concerns. Workers may have limited training or language proficiency, increasing the chance of accidents and reducing their ability to report unsafe conditions.⁶⁹

⁶⁴ [“Safety Guidelines: Onboard Hazards.” United States Center for Disease Control and Prevention, 27 Feb 2024.](#)

⁶⁵ [Myers, Melvin L., and Robert M. Durborow. “Aquacultural Safety and Health.”](#)

⁶⁶ [Myers, Melvin L., and Robert M. Durborow. “Aquacultural Safety and Health.”](#)

⁶⁷ [Garforth, Dave and Dr Judith Brown. “Occupational Health and Safety in the Aquaculture Industry: A Global Review.” RS Standards and Lloyd’s Register Foundation, 2024.](#)

⁶⁸ [“Seafood Processing.” United States Centers for Disease Control and Prevention, 29 Dec 2023.](#)

[Andrup, Lars et al. “Occupational Health Issues in the Seafood Industry Due to Biological Exposures: A Narrative Review.” Safety and Health at Work 16\(4\) Dec 2025.](#)

⁶⁹ [“Seafood Processing.” United States Centers for Disease Control and Prevention, 29 Dec 2023.](#)

3.3.3 Women in Fishing

Women are often concentrated in low-wage processing roles.⁷⁰ These can include filleting, sorting, packaging, drying, and trading fish. These positions are usually paid by piece rate, and they are typically physically taxing with few occupational protections. There is little or no access to benefits like health care, maternity leave, or pensions. In many processing plants, women must supply their own gloves, aprons, or knives, effectively subsidizing production costs from their already limited earnings. In trading and market roles, they often absorb losses when catches spoil or market prices fall. The seasonal and perishable nature of seafood creates unstable and unpredictable income. To avoid losing work or wages, women may experience pressure to accept low pay and tolerate unsafe or abusive working conditions, including the risk of sexual harassment or sexual abuse at worksites. At the same time, expectations that women carry primary responsibility for unpaid household labor limit their ability to seek alternative employment. Together, these pressures increase economic dependence and material insecurity, making women in seafood supply chains vulnerable to exploitative and coercive labor conditions.⁷¹

3.3.4 Child Labor

Child labor is present throughout the seafood sector. In informal fishing, children dive for fish because they are believed to have stronger lungs than adults. These children often dive without any protective gear, putting them at high risk for injury or death. They may handle sharp tools and heavy nets. There is also evidence that children work in fish processing in a number of countries. Due to the highly hazardous nature of fishing work in general, employment of children in this sector is often considered a worst form of child labor.⁷² Child labor in the seafood sector takes different forms across regions, but most cases

⁷⁰ [“In fishing industry, women face hidden hardships: study.” Gender Aqua Fish, 25 May 2021.](#)

⁷¹ [Finkbeiner, Elena M. 2021. “A call for protection of women’s rights and economic, social, cultural \(ESC\) rights in seafood value chains.” Marine Policy 128, Jun 2021.](#)

[Froukje Kruijssen, Cynthia L. McDougall, Imke J.M. van Asseldonk. “Gender and aquaculture value chains: A review of key issues and implications for research.” Aquaculture, Volume 493, 2018.](#)

[“Promoting Gender Equality and Women’s Empowerment in Fisheries and Aquaculture.” Food and Agriculture Organization of the United Nations \(FAO\), n.d.](#)

[Mangubhai, Sangeeta et al. “Gender-Based Violence: Relevance for Fisheries Practitioners.” Fish and Fisheries 24 \(3\), 24 Mar 2023.](#)

⁷² [“Eliminating child labour in fisheries and aquaculture: Promoting decent work and sustainable fish value chains.” Food and Agriculture Organization of the United Nations, 2018.](#)

[“Caught at Sea: Forced Labour and Trafficking in Fisheries.” ILO, 2013.](#)

share patterns of highly hazardous and very low-paid work, poverty, and limited access to education as drivers.

3.3.5 Illustrative Examples

Trafficking networks in Bangladesh reportedly exploit children in the fishing, shrimp, and dried fish industries. Rohingya refugees from Myanmar are reportedly particularly vulnerable because they lack legal status, work authorization, and protection under Bangladeshi law.⁷³ Children are reportedly recruited directly from over-crowded refugee camps to work as fishers, sometimes using debt-based coercion.⁷⁴ For example, UNICEF has reported that parents may be offered “advance-payments” or loans for the work of their children in the dried fish industry around the area of Cox’s Bazar in Bangladesh. Children are then required to work to pay off these loans.⁷⁵

In Honduras, children and adults from the Moskitia region, including members of Indigenous and Afro-descendant communities, are reportedly at risk of exploitation in the fishing and lobster industries. The region is geographically isolated, with few roads and little connection to the rest of the country. Employment options are limited, and aside from subsistence farming, the only source of income for most residents is fishing on small-scale vessels and industrial lobster diving, which is very low paid and extremely hazardous work. Boat captains are reported to deny needed medical transport to save fuel or to abandon injured men at sea, and victims’ families are rarely compensated for death or life-altering injuries.⁷⁶ Nevertheless, these workers may have no other means of livelihood.⁷⁷

⁷³ [Hossain, A. et al. “Vulnerabilities of Rohingya and host community children in Bangladesh: A qualitative study on child labor, well-being, and the impact of COVID-19.” PLOS Global Public Health 5\(7\), 3 Jul 2025.](#)

⁷⁴ [“Forced Labor and the Seafood Supply Chain.” NOAA Fisheries, 2024.](#)

[“Lobster Divers Risk Injury, Death in Honduras.” VOA, 26 Dec 2018.](#)

⁷⁵ [Arnold, Katie. “Traffickers Are Preying on Rohingya Children in Bangladesh Camps.” Thompson Reuters Foundation, 8 Nov 2017.](#)

⁷⁶ [Driver, Alice. “Diving—and Dying—for Red Gold: The Human Cost of Honduran Lobster.” Civil Eats, 6 Dec 2023.](#)

⁷⁷ [US Department of State. Joint Report to Congress on Trafficking in the Seafood Supply Chain. 2020.](#)

In Ghana, child labor in fishing is closely tied to trafficking and debt bondage.⁷⁸ Children are often sent by their parents under informal contracts to work on Lake Volta, where they dive underwater to untangle nets from submerged tree roots, a task that can lead to drowning.⁷⁹

In Mauritania, hereditary slavery persists in the Haratine and Afro-Mauritanian communities where adults and children from former slave castes are reportedly in situations of forced labor in the fishing industry. Dependent relationships with families of their ancestors' enslavers, limited education, economic exclusion, and cultural norms reinforce these hierarchies.⁸⁰

Interviews Verité conducted with fishers in the Philippines revealed that within the handline fishing sub-sector, vessel owners hiring workers would not specify the type of work involved, where they were going, the length of a fishing voyage at sea, or the payment system.⁸¹ Most interviewed handline fishers reported that it was common for their fishing expeditions to reach the waters of Indonesia, but only a few of them clearly understood that they were legally restricted from fishing in these waters, putting their safety at risk with misinformation.⁸²

According to the U.S. Department of State, there are reports that traffickers coerce disabled men into work in aquaculture and on fishing vessels in South Korea.⁸³ As is also the case across several other sectors, employers present themselves as caretaking figures, offering housing and food. However, they reportedly withhold identification documents, control communication, and use violence, threats and manipulated debt to maintain control. Some disabled workers work long hours and are denied pay due.⁸⁴

⁷⁸ [United States Department of Labor. List of Goods Produced by Child Labor or Forced Labor.](#)

⁷⁹ [United States Department of Labor. List of Goods Produced by Child Labor or Forced Labor.](#)

⁸⁰ ["Forced Labor and the Seafood Supply Chain." NOAA Fisheries, 2024.](#)

[US Department of State. Trafficking in Persons Report. Mauritania. 2024.](#)

⁸¹ [Lawrence, Felicity, and Kate Hodal. "Thailand Accused of Failing to Stamp out Murder and Slavery in Fishing Industry." The Guardian, 30 Mar 2017.](#)

⁸² ["Research on Indicators of Forced Labor in the Supply Chain of Tuna in the Philippines." Verité, 2012.](#)

⁸³ [US Department of State. Trafficking in Persons Report. 2025.](#)

⁸⁴ [Shin, Ji-hye "Lawyer warns of supply chain risks tied to forced labor in Korea and overseas." The Korea Herald, 5 Jul 2025.](#)

Recommendations: Due Diligence Steps to Address Risks

4.1 Conclusions

This report examined the forced labor risks in the operations and supply chains of companies in the seafood sector.

The risks of exploitation of workers trace, in most cases, back to the inadequate due diligence processes of third-party services providers, labor agencies, and suppliers; and deceptive and exploitive recruitment processes that result in worker debt and compound other risk factors for migrant workers.

Companies should view the contents of this report as a starting point and seek to further develop their understanding of the specific weaknesses and risks in their supply chains at all tiers, in order to implement dynamic and ongoing risk assessments and mitigation strategies.

The findings of this report largely point to potential gaps in companies' due diligence systems or approaches to managing risk. The following recommendations for addressing these potential process gaps offer seafood sector entities practical guidance for implementing comprehensive measures to control forced labor risks and protect their operations and individuals who may be vulnerable to exploitation within their supply chains. Effective due diligence requires a systematic approach that integrates risk assessment, prevention and mitigation, capacity building, and monitoring. This involves developing comprehensive frameworks that can identify and address potential forced labor indicators across diverse operational contexts. The goal is not merely to achieve compliance but to create sustainable systems that protect vulnerable populations and prevent forced labor while maintaining operational efficiency and competitive advantage.

The ResponsibleSourcingTool.org site overall and the [Due Diligence Toolset](#) specifically provide technical tools to support the implementation of the following recommendations. The recommendations that follow and the toolset referenced align with the [UN Guiding Principles on Business and Human Rights](#) and the [OECD Due Diligence Guidance for Responsible Business Conduct](#). Tool 1 of the [Seafood Due Diligence Toolset](#) provides a model due diligence program for identifying potential risks of human trafficking within a supply chain, evaluating and prioritizing identified risks, implementing solutions, and monitoring and improving supplier performance over time.

4.2 Recommendations

4.2.1 Policy and Embedding Forced Labor Prevention Standards and Practices in Business Functions

- 4.2.1.1 Companies should include a clear prohibition against forced labor in their Codes of Conduct and supplier performance standards. (See Seafood Tool 2.) This should include the “employer pays” principle, which requires that all fees and expenses relating to the recruitment and placement of a worker are paid by the employer.

- 4.2.1.2 The policy should be clearly communicated to all business entities, including third-party service providers and labor agents, and included in business contracts. (See Seafood Tool 5.) The contracts should also require that the policy be cascaded to the suppliers’ suppliers.

- 4.2.1.3 Procurement staff should be formally assigned, trained, and supported to screen prospective suppliers, including third-party service providers and labor agents, for their commitment and capacity to meet the policy standards on avoiding forced labor. (See Seafood Tools 3, 7, and 8.) There should be clear consequences established for supplier performance on achieving the standards.

- 4.2.1.4 Review of a supplier’s management of forced labor risks should be incorporated in regular supplier engagements, such as quarterly business reviews, quality audits, and other existing supplier management processes.

4.2.2 Risk Assessment and Prioritization

- 4.2.2.1 Conduct a combined supply chain mapping and forced labor risk assessment as a key first step in creating a targeted strategy for segmenting and prioritizing risks to address. (See Seafood Tool 6.) High level risk factors to consider include characteristics of country of operation, product or production processes involved, and workforce demographics (e.g., prevalence of migrant workers). Other factors to consider include a company’s ability to influence suppliers based on volume/spend and the degree of harm to people that practices may cause.

4.2.3 Needs Assessment and Capacity Building

- 4.2.3.1 Based on the results of a risk assessment, companies should conduct deep dives (e.g., targeted research, risk assessments, rapid appraisals, supplier assessments) to develop and implement action plans to address the underlying causes of identified risk or issues. The activities, which should be informed by clear objectives and measurable

success indicators, may range widely from supplier training to engagement in multistakeholder initiatives where companies individually lack the leverage to drive positive changes in an operating environment (e.g., where economic or political factors are immovable in the immediate term).

4.2.4 Monitoring

- 4.2.4.1 Companies need to routinely evaluate whether they are implementing their due diligence processes as planned (e.g., new suppliers screened for forced labor risks, review of corrective action plans during regular supplier business reviews).
- 4.2.4.2 The effectiveness of due diligence activities should be tracked to ensure the desired impacts are on target and sustainable (e.g., worker-paid recruitment fees are avoided, foreign migrant workers are in full control of their identification documents, workers have access to remedy).