

Prepared Testimony of  
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Before the  
United States International Trade Commission On  
Investigation No. 332-575

Seafood Obtained via Illegal, Unreported, and Unregulated Fishing: U.S. Imports and  
Economic Impact on U.S. Commercial Fisheries

September 03, 2020

Commissioners, my name is Juno Fitzpatrick. I am the human rights and social responsibility program manager for Conservation International's Center for Oceans. Thank you for the opportunity to share our views on the impact of Illegal, Unreported, and Unregulated (IUU) fishing on the seafood sector.

### **Fisheries and Illegal Unreported and Unregulated Fishing**

Fisheries provide a primary protein source for 3 billion people — 3 out of every 7 on the planet (FAO 2016). The Food and Agriculture Organization (FAO) estimates that 90% of world fisheries are fully exploited or overexploited (FAO, 2018).

Illegal, unregulated, and unreported (IUU) fishing is any violation of national or international conservation and management laws, which includes: unauthorized transshipments to cargo vessels, fishing without licenses and failing to report or submitting false catch data, fishing in protected areas, and using prohibited fishing gear (NOAA). A global study held in 2009 concluded that worldwide IUU extraction is

estimated to be worth up to US\$23.5 billion each year, equivalent to 26 million tonnes of fish annually (Agnew, D.J. et al. 2009 ). This means roughly 1 in 5 wild-caught fish in the market was caught illegally. This has led to significant global impacts on fisheries and loss of revenue and livelihood opportunities (Sumaila et al. 2006; World Bank Group 2017).

IUU fishing and fisheries overexploitation are a pervasive threat globally, particularly in developing countries which often exhibit limited monitoring, control, and surveillance capacity. This issue is further compounded by these countries' significant dependence on fisheries resources for national food and livelihood security (Allison 2011).

### **Social Performance in the Seafood Sector**

Social performance in the seafood sector is among the worst production sectors on the planet. Approximately 200 million people around the world depend directly or indirectly on the seafood industry for employment (World Economic Forum, 2018). According to statistics from the International Labour Organization (ILO), there are now around 40 million victims of modern slavery in the world, of which 25 million are in situations of forced labor. Of the 25 million, 16 million are in the private sector – half of whom are trapped in debt bondage. (ILO, 2017)

In 2015, a series of investigations began to uncover the human rights abuses pervasive in the seafood sector and how our oceans play host to rampant criminality and exploitation. Headlines on “sea slaves” uncovered the stories of men and women, forcibly held — sometimes for decades — with little or no pay on fishing boats and in processing plants (McDowell, Mason, and Mendoza, 2015). These media revelations about slavery and human rights abuses have placed social issues at the forefront of a sector that has spent decades working to improve environmental sustainability. Human rights violations in the seafood industry are accompanied by other serious issues, including institutionalized inequality, undermining of food and livelihood security, and

loss of access rights. Collectively these factors drive social instability, poverty and resource decline.

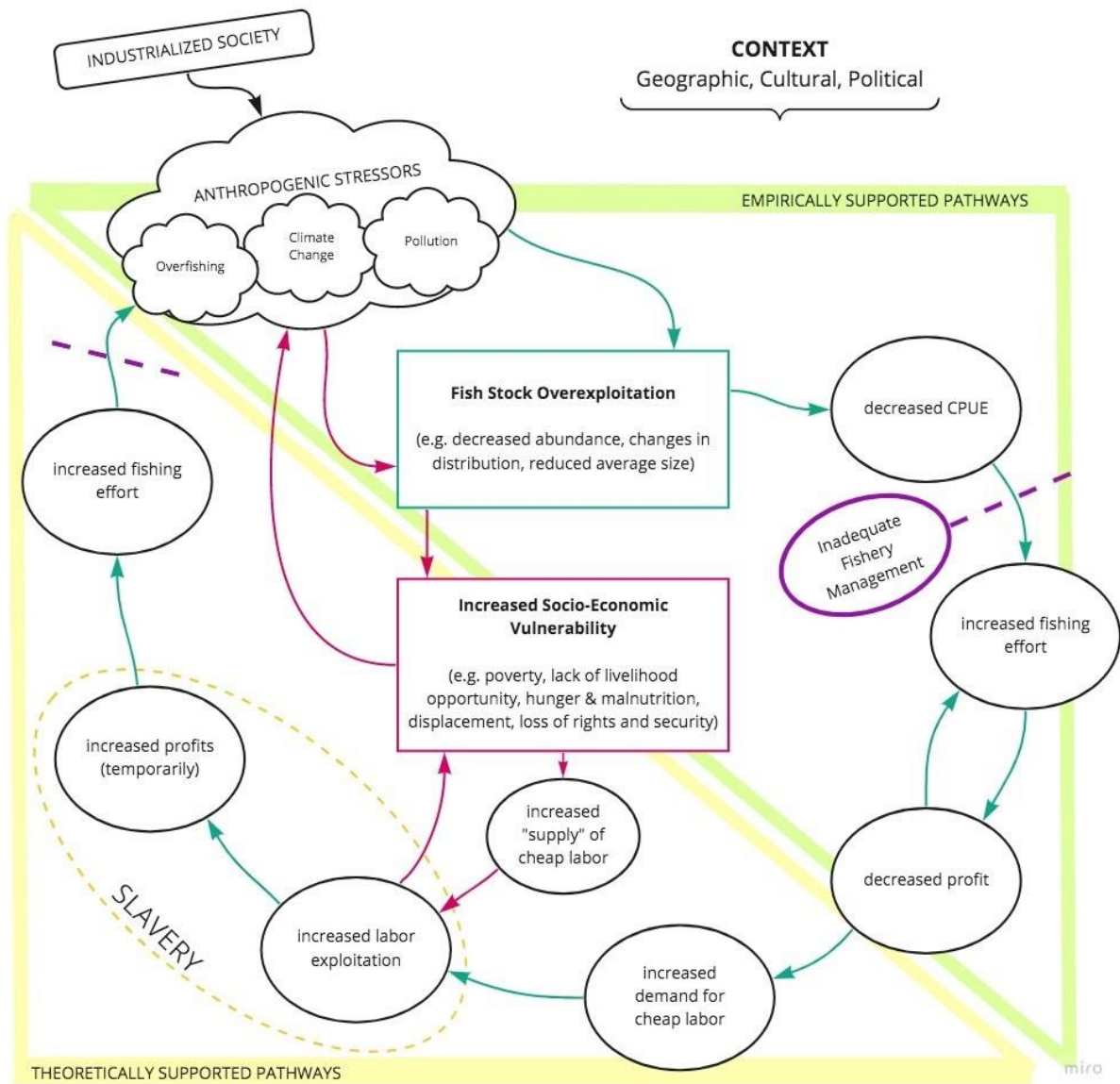
Links between IUU fishing and crew welfare have been acknowledged by the United Nations, FAO, International Organization of Migration and others, with the ILO estimating that more than 24,000 deaths occur every year in fisheries—making fishing one of the most dangerous vocations in the world. (ILO, 1999, FAO, 2015)

### **IUU Fishing and Human Rights Abuses**

Forced labor, human trafficking, child labor, and other major human rights violations often co-occur with IUU fishing. Recent analyses have demonstrated a clear link between the prevalence of modern slavery and human rights abuses in global fisheries and poor environmental performance (Tickler et al. 2018). The same factors that enable illegal harvesting and overfishing also drive human rights abuses in the sector: rising demand, marginal profitability, opaque industry practices, and weak governance. This is a major step forward in articulating the linkage between social responsibility and environmental sustainability, which are interdependent in global fisheries and aquaculture (Kittinger et al. 2017).

Fishery overexploitation and human rights abuses are theoretically linked through a positive feedback loop where increasing exploitation leads to negative socio-economic impacts on vulnerable groups, and vice versa. This feedback loop drives labor exploitation by increasing the socio-economic vulnerability of marginalized and subsistence communities to becoming exploited. Quota restrictions and declining fish stocks in many regions of the world have led to destitute fishers, and fishing communities are deprived of their livelihoods and of an important food source. The socio-economic conditions generated by overfishing may make fishers and fishing communities vulnerable to recruitment into criminal activities. (De Coning 2011)

At the same time, depleted stocks drive increased fishing effort (fishing farther, deeper, and longer), and thereby costs, increasing the demand for cheap labor to offset the loss in profit. This temporarily increases profits for one party at the expense of the persons being exploited, and in turn contributes even further to overfishing.



**Figure 1:** A conceptual map of the relationship between overexploitation of fish stocks and increasing socio-economic vulnerability, adapted from Sparks (2018), resulting in a variety of human rights abuses including labor exploitation. Sparks (2018) highlights the disparity in the part of the system that is supported in the literature by empirical studies (green triangle), versus the area predominantly supported by human rights theory constructed from in-depth case studies with victims, survivors, and offenders (yellow triangle).

The cycle above persists because of multiple underlying conditions that facilitate the connections between overfishing and human rights abuse.

- These include:
  - **Global fishery overcapitalization and subsidies** (~\$35 million USD) that offset rising operational costs that would otherwise encourage a reduction in fishing capacity (Trent et al. 2016; Beddington et al. 2007; Sumaila et al. 2008). Similarly, unpaid or underpaid labor (and reduced expenditure on safe conditions for crew) acts as a hidden subsidy to vessel operators under pressure to cut costs because of failing stock productivity and declining financial returns (Tickler et al. 2018; ILO 2009).
  - **Transshipment** can facilitate both illegal fishing as well as trafficking and exploitation of workers who are trapped and abused onboard fishing vessels (Ewell et al. 2017; Boerder et al. 2018; Miller et al. 2018; Pew 2018).
  - **Flags of convenience** help vessels that fish illegally and engage in human trafficking to escape detection and avoid legal consequences (Gianni & Simpson 2005).
  - **Opaque supply chains** that hide exploitative activities, both in terms of fishing and human rights abuses, even from seafood companies that want to source sustainably, let alone those who are only interested in meeting the bare minimum legal requirements for transparency and traceability (Gold et al. 2015; Lewis et al. 2017).
  - **Rising consumer demand for cheap seafood** primarily in the most developed countries that have surpassed the production capabilities of

their own waters. (Sparks et al. 2018; Pauly & Zeller 2016)

- **Distant Water Fishing (DWF) and IUU fishing** that undermine efforts to sustainably manage fisheries and are more likely to perpetrate human rights abuses at sea (Tickler et al. 2018; GSI 2018; CEA 2018).
- **Ineffective fisheries management and governance practices**, particularly for highly migratory species and transboundary stocks.
- **Regulatory gaps that inhibit minimum international labor protections for fishery workers**, both on paper and in practice. Many countries have not signed on to the relevant treaties, and even those international agreements that do exist have loopholes that exclude protection for fishers working in international waters, and vulnerable groups like migrant workers (Sparks 2018; Decker Sparks & Silva 2018)

### **Slavery is Broader than Forced Labor (Jordan 2011).**

Case studies of human rights and labor abuse in seafood supply chains include examples of recruitment under false pretenses, 20 hour workdays, child labor, physical and mental abuse, abandonment, murder, and withholding of pay and identifying documents (Lewis et al. 2017). These abuses, which co-occur with other problematic working conditions such as improper hygiene, lack of communication or fire safety equipment, substandard food, and poor accommodations, may be driven by economic pressures exacerbated by decreasing catch (EJF 2010).

While there is recognition that modern slavery occurs in fishing industries in most parts of the world, there are few reliable estimates of the prevalence of forced labor and human rights abuses across the sector.

- Recent research by the **Walk Free Foundation and The Sea Around Us Project (Tickler et al. 2018)** examined the relationship between country-level estimates of slavery provided by the Global Slavery Index (GSI) and a number of fisheries-specific characteristics. The analysis found that countries with documented instances of labor abuse were characterized by high levels of unreported catch, a high proportion of catch taken outside of their EEZs, fishing occurring a long distance from home waters, and higher than average fishing subsidy levels. The paper identified **Taiwan, South Korea, Russia, China, Japan, Spain, and Thailand** as having a higher risk of modern slavery in their fishing fleets. These countries generate 39 percent of the world's catch, and with the exception of Spain, modern slavery has been identified in all of their fisheries. (Walk Free Foundation, 2018).
- **Thailand and the Mekong Delta** region are considered a hotspot for forced labor and human rights abuse in fisheries, and much of the research has been focused on this region. Human rights abuses on Thai fishing vessels are well-documented, with most issues concerning the abuse of migrants from Cambodia, Laos, or Myanmar (e.g., Human Rights Watch 2010, Issara Institute 2017, ILO 2013).
- A 2017 study by the Issara Institute and the International Justice Mission examining the experiences of Cambodian and Burmese fishers in Thailand between 2011 and 2016 found that 76 percent of migrant workers in the Thai fishing industry had been held in debt bondage and almost 38 percent had been trafficked into the Thai fishing industry in that time-frame (Issara Institute, 2017)
- A study by the **Nexus Institute and the International Organization of Migration (Surtees 2012)** documented the experiences of Ukrainian

nationals who were trafficked into working in fisheries in **Russia and South Korea**.

- In **Taiwan, Greenpeace (2016)** identified widespread labor and human rights abuse and physical violence, along with IUU fishing and drug trafficking aboard vessels in Taiwan's distant water fishing fleet. They also found that many of these vessels were engaged in shark finning in addition to tuna fishing, highlighting another linkage between IUU fishing and human rights abuse. The victims of human rights abuse on the Taiwanese vessels are typically migrants or foreign workers – in one case study, a vessel stopped in Palau to pick up Indonesian crew members hired through an Indonesian recruitment agency.
- A 2019 report by the **Environmental Justice Foundation (2019)** provides case studies of human rights abuse in a number of geographies, including: **United Kingdom, Ireland, Spain, United Arab Emirates, Indonesia, Myanmar, Cambodia, Thailand, Vietnam, Taiwan, and Hawaii**.

### **The United States is a major driver of these problems**

Developed countries are implicated in the trade of IUU fish. The United States is a major driver of these problems; the U.S import about 90% of the seafood consumed, and about 1/3 of wild caught imports are estimated to have derived from IUU sources, with an estimated value of \$1.3-2.1 billion USD (Pramod et al. 2014). The U.S. imports fish from countries known to be high risk for modern slavery including China, Ghana, Indonesia, Russia, South Korea, Taiwan, and Thailand. Imports from these geographies



are valued at an estimated \$3 billion each year (Walk Free Foundation, 2018). In 2019, the U.S Customs and Border Protection Agency issued the first forced labor-related detention order for tuna products from Vanuatu flagged long-liner, Tunago 61. In 2020, accounts of abusive conditions and forced labor ushered the Customs and Border Protection Agency to issue a Withhold Release Order to block shipments from the Da Wang, a Taiwan-based, Vanuatu-flagged fishing vessel that supplies U.S. buyers.

In the U.S, reports of poor working conditions, forced labor, and trafficking onboard American flagged and owned vessels shed light on social issues in a 140-vessel fleet targeting swordfish and ahi on the west coast of the U.S and Hawai'i (Mendoza & Mason, 2016).

COVID-related relaxation of human observer requirements, reductions in at-sea enforcement capacity, and increased rates of transshipment, will likely exacerbate the positive feedback loop between harmful fishing and the exploitation of people, with dire consequences for workers at sea (i.e. working conditions, occupational health and safety) and seasonal, migrant workers in the U.S seafood sector (Wigglesworth, 2020).

### **Recommendations for Addressing Overfishing Fishing and Labor Abuses**

The U.S. has made significant effort to address environmental and economic sustainability, but laws, enforcement, and fisheries management have not adequately addressed social sustainability. The industry now acknowledges social sustainability, but the U.S. has not kept pace. Existing laws and regulations designed to tackle international IUU fishing and human trafficking need to be expanded and implemented more rigorously, and in coordination with existing programs.

In April 2020, WWF-US, International Labor Rights Forum (ILRF), CSIS Stephenson's Ocean Security Project, Natural Resources Defense Council, Humanity United and

Conservation International co-authored a factsheet, titled: "IUU Fishing and Human Rights: Problems and Solutions"<sup>1</sup>. On behalf of the group, we suggest the following policy recommendations:

- 1. Pressure on supply chains:** There are a number of programs and authorities designed to combat IUU fishing and human trafficking in supply chains. These include the Seafood Import Monitoring Program (SIMP), enacted under the Magnuson-Stevens Act (MSA)<sup>2</sup>, and the Tariff Act.<sup>3</sup> Despite this legislation, entire product lines are not targeted, and the opaque nature of the seafood industry inhibits effective compliance and enforcement. Congress should ensure that the agencies are using existing authorities effectively to ensure that all products entering into the U.S. market are not produced through IUU fishing or with forced labor. Congress should also explore directing the agencies to pursue additional tools, including requirements for due diligence plans, full chain traceability, and transparency.
- 2. Pressure on responsible nations:** The High Seas Driftnet Fishing Moratorium Protection Act (HSDFMPPA) allows the United States to pursue sanctions against nations responsible for IUU fishing. Much like SIMP, NOAA should revise HSDFMPPA implementation to maximize existing statutory discretion. This includes broadening the definition of IUU to include IUU fishing wherever it occurs as well as including labor and human rights violations. Structural improvements could include the close collaboration of IUU agencies with the State Department Trafficking in Persons report process, the Department of Labor's List of Foods,

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<sup>1</sup> *IUU Fishing and Human Rights: Problems and Solutions*. April 2020. Conservation International, WWF-US, International Labor Rights Forum, CSIS Stephenson's Ocean Security Project, Natural Resources Defense Council and Humanity United

<sup>2</sup> MSA Sec. 307(1)(Q) "It is unlawful for any person to import, export, transport, sell, receive, acquire, or purchase in interstate or foreign commerce any fish taken, possessed, transported, or sold in violation of any foreign law or regulation."

<sup>3</sup> Tariff Act Sec. 307 as amended by the Trade Facilitation and Trade Enforcement Act "[a]ll goods, wares, articles, and merchandise mined, produced, or manufactured wholly or in part in any foreign country by convict labor or/and forced labor or/and indentured labor under penal sanctions shall not be entitled to entry at any of the ports of the United States, and the importation thereof is hereby prohibited."

and other similar efforts.

- 3. Capacity building:** Finally, the US government should support efforts in producing, harvest, flag, and processing nations to put in place and enforce sustainable fisheries management and labor rights systems and to ensure that U.S. import requirements do not fall on those least able to handle them.

The U.S. could further enhance its commitment to social considerations in commercial fisheries by ratifying the Cape Town Agreement (CTA), which would establish binding standards and regulations designed to protect safety of crew and observers on commercial vessels (IMO, 2019). In addition, the U.S. has yet to ratify the ILO Work in Fishing Convention (No. 188) as well as 6 of the ILO Core Conventions on Decent Work. With less than 20 countries having already ratified the ILO C 188, this pivotal decision would establish binding requirements on decent working conditions, including wages, working hours, occupational safety and health, and social security, as well as prevent unacceptable forms of work, forced labor, trafficking, and other abuses.

## **Conclusion**

As the relationship between human rights abuses and fishery overexploitation has become more clear, many initiatives have started to research specific linkages in the system. Even with this progress, the full picture of social abuse in the global seafood sector remains opaque due to the sector's diversity (in geographies, jurisdictional complexities and production methods), and because of the ease of evading enforcement (Kara 2018). There is a critical need to take a coordinated, broader view to identify and overcome knowledge gaps across the entire system in order to pinpoint the most effective levers to disrupt the cycle.

In response, Conservation International is leading The Decent Work in Fisheries Initiative (DWFI), a global study of trends in violations of ILO Fundamental Principles and Rights at Work (No. 87, 98, 29, 105, 138, 182, 100, and 111) and Decent Work

(ILO C188) in marine wild capture fisheries. On the water, CI implements effective tools and policies to protect workers' civil, political, economic, social, and cultural rights. We deliver on this through piloting the Social Responsibility Assessment Tool—a diagnostic, benchmarking, or risk-assessment tool for conducting human rights due diligence in seafood supply chains. This work will provide a basis for future efforts to assess the correlation between overfishing and a range of labor challenges faced by workers at sea.

Thank you, Commissioners, for this opportunity to testify.

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