

Human Rights Due Diligence in Global Seafood Supply Chains: Policy Pathways for Ethical Fish Trade

Executive Summary

Global seafood supply chains are implicated in widespread labour abuses, including forced labour and debt bondage which affect workers from vessel to processing plant.[1] As of August 2023, 65% of assessed seafood-producing countries that are involved with 98% of seafood production showed documented evidence of forced labour, child labour, or human trafficking in their seafood sectors.[2]

These abuses persist because regulatory oversight at sea is fragmented, corporate supply chain transparency is weak, and voluntary standards have proven insufficient.[3] Possible remedies include mandatory due diligence legislation, enforceable traceability systems, and targeted support for affected workers delivered through coordinated international action.

The Problem

Seafood supply chains are among the world's most complex sector. Fish caught in the Pacific may be processed in Southeast Asia, distributed through European ports, and consumed in North America.[4] This dynamic creates both a logistical and a governance gap that enables exploitation. A 2026 ILO survey found that 13% of migrant workers in Southeast Asia's fishing and seafood processing sectors were in situations of forced labour.[5]

Specific challenges include:

- Illegal, unreported and unregulated fishing leads to human rights violations due to its operation without any legal scrutiny.[6]
- Poor monitoring and enforcement in offshore fishing activities facilitate labour abuses among fishers, especially those in international waters.[7]

[1] Business & Human Rights Resource Centre, 'Certifications & Ratings Collaboration Data Finds 65% of Countries Assessed Have Evidence of Forced Labour, Child Labour or Trafficking, Urging Companies to Address Abuse in Their Supply Chains' (2024) <https://www.business-humanrights.org/en/latest-news/certifications-ratings-collaboration-data-finds-65-of-countries-assessed-have-evidence-of-forced-labor-child-labor-or-trafficking-urging-cos-to-address-abuse-in-their-supply-chains/> accessed 11 June 2026.

[2] Aquaculture Stewardship Council (ASC), 'Human Rights Issues in the Farmed Seafood Industry and the Role of Certification' (ASC Blog, 2024) <https://asc-aqua.org/blog/human-rights-issues-in-the-farmed-seafood-industry-and-the-role-of-certification/> accessed 11 June 2026.

[3] Stanford Center for Ocean Solutions, 'Addressing Illegal Fishing and Labor Abuses' <https://oceansolutions.stanford.edu/key-initiatives/addressing-illegal-fishing-and-labor-abuses> accessed 11 June 2026.

[4] The Pew Charitable Trusts, 'From Ship to Shelf, the Pacific Tuna Trade Is a Complex Global Business' (12 September 2025) <https://www.pew.org/en/research-and-analysis/data-visualizations/2025/09/from-ship-to-shelf-the-pacific-tuna-trade-is-a-complex-global-business> accessed 11 June 2026.

[5] ILO, 'Ship to Shore Rights Southeast Asia: Baseline Research Findings' (ILO 2026); reported in Responsible Seafood Advocate, 'ILO Survey Finds Forced Labor Risks Persist in Southeast Asian Fisheries' (2 March 2026) <https://www.globalseafood.org/advocate/i-lo-survey-finds-forced-labor-risks-persist-in-southeast-asian-fisheries/> accessed 10 June 2026.

[6] Responsible Sourcing Tool (2026) Seafood Report (March 2026) <https://www.responsible sourcingtool.org/wp-content/uploads/2026/03/seafood-report-260310.pdf> accessed 11 June 2026.

[7] Stanford Center for Ocean Solutions, 'Addressing Illegal Fishing and Labor Abuses' <https://oceansolutions.stanford.edu/key-initiatives/addressing-illegal-fishing-and-labor-abuses> accessed 11 June 2026.

Who is affected?

- **Migrant Workers:** Low-income migrant workers (predominantly men from Cambodia, Indonesia, Myanmar, and Vietnam) deployed on distant-water fishing fleets or processing facilities. [8]
- **Small-Scale Fishers:** Local fishers in West Africa and the Indian Ocean face similar high-level risks but receive far less attention from international oversight bodies. [9]

Why it is an issue



First

jurisdiction over labour law aboard fishing vessels is contested between flag states and port states, leaving many workers without legal protection.[10]



Additionally

seafood supply chains involve several intermediaries, obscuring origin thus hindering accountability.[11]



Lastly

voluntary certification schemes such as Marine Stewardship Council[12] and Aquaculture Stewardship Council[13] focus overwhelmingly on environmental performance. Social audits remain largely optional, superficial, and easily faked.[14]

[8] International Labour Organization (2026) Survey highlights challenging conditions faced by migrant workers in Asia's fishing and seafood processing industries (<https://www.ilo.org/resource/news/survey-highlights-challenging-conditions-faced-migrant-workers-asia%E2%80%99s>) accessed 11 June 2026.

[9] WIOMSA, 'TUU Fishing in the Small-Scale Fisheries of the Western Indian Ocean' <https://www.wiomsa.org/iuu-fishing-in-the-small-scale-fisheries-of-the-wio/> accessed 11 June 2026.

[10] Benjamin Saul, 'The Principle of Non-Refoulement and the "Migration Crisis": The Role of States in Regulating Migration' (2021) 26(1) Melbourne Journal of International Law <https://www5.austlii.edu.au/au/journals/MelbJIL/2021/26.html> accessed 11 June 2026.

[11] SeafoodSource, 'FAIRR: Traceability shortcomings putting seafood supply chains at risk' (2026) <https://www.seafoodsource.com/news/supply-trade/fairr-traceability-shortcomings-putting-seafood-supply-chains-at-risk> accessed 11 June 2026.

[12] Marine Stewardship Council (MSC), 'Home page' <https://www.msc.org/> accessed 11 June 2026.

[13] Aquaculture Stewardship Council (ASC), 'Home page' <https://asc-aqua.org/> accessed 11 June 2026.

[14] Marine Stewardship Council (MSC), 'Overfishing and climate change are top ocean concerns, say MSC stakeholders' (26 January 2026) <https://www.msc.org/media-centre/news-opinion/news/2026/01/26/overfishing-and-climate-change-are-top-ocean-concerns-say-msc-stakeholders> accessed 11 June 2026.

Policy Relevance

- Human rights due diligence is at the centre of trade, investment, and development policy.[15] The European Union's Corporate Sustainability Due Diligence Directive (Directive 2024/1760), mandates that large companies identify and address adverse human rights impacts across their entire chain of activities, with financial penalties and civil liability for non-compliance.[16]
- This creates direct market access implications for all seafood-exporting countries. Corporations that fail to demonstrate clean supply chains risk having their products barred from European markets.[17] For major seafood exporters in Africa and Asia, alignment with Human Rights Due Diligence standards is now a trade imperative not an ethical duty.[18]

Key Evidence

- The International Labour Organization (ILO) estimates that at least 128,000 fishers are trapped in forced labour aboard vessels worldwide, a figure which is widely understated.[19]
- A lack of transparency and traceability in seafood supply chains facilitates illegal, unreported, and unregulated (IUU) fishing, which is estimated to account for around 20% of global wild-caught seafood.[20]

Recommendations

- **Strengthen Vessel-Level Tracking and Post State Regulations.** Governments and international bodies should prioritize catch documentation measures that capture vessel identity, crew nationality, and labour conditions. Additionally, Port states should conduct strict social compliance inspections before vessels are permitted to offload.
- **Improve Access to Remedy for Affected Workers.** Effective Human Rights Due Diligence requires that workers can report abuse safely and access reliefs. Governments should fund worker-facing grievance mechanisms including multilingual hotlines and legal aid which are independent of the companies being monitored.

[15] United Nations Development Programme (UNDP), 'Heightened Human Rights Due Diligence: Not just important, indispensable' (Speech) <https://www.undp.org/speeches/heightened-human-rights-due-diligence-not-just-important-indispensable> accessed 11 June 2026.

[16] Directive (EU) 2024/1760 of the European Parliament and of the Council of 13 June 2024 on corporate sustainability due diligence and amending Directive (EU) 2019/1937 and Regulation (EU) 2023/2859 (CSDDD) OJ L 2024/1760.

[17] FAIRR Initiative, 'Supply Chain Traceability Gaps Leave Global Seafood Giants at Risk Amid Mounting Investor Attention' (4 December 2024) <https://www.fairr.org/news-events/press-releases/supply-chain-traceability-gaps-leave-global-seafood-giants-at-risk-amid> accessed 11 June 2026.

[18] Office of the United Nations High Commissioner for Human Rights (OHCHR), 'Mandatory human rights due diligence (mHRDD)' <https://www.ohchr.org/en/business-and-human-rights/mandatory-human-rights-due-diligence-mhrdd> accessed 11 June 2026.

[19] International Labour Organization (ILO), 'Forced Labour in Commercial Fishing' (ILO, 7 August 2024) <https://www.ilo.org/sites/default/files/2024-08/Forced%20labour%20in%20commercial%20fishing%20Web.pdf> accessed 11 June 2026.

[20] FAIRR Initiative, 'Supply Chain Traceability Gaps Leave Global Seafood Giants at Risk Amid Mounting Investor Attention' (4 December 2024) <https://www.fairr.org/news-events/press-releases/supply-chain-traceability-gaps-leave-global-seafood-giants-at-risk-amid> accessed 11 June 2026.