

Silenced Voices

Human rights risks
hidden in the opaque
tuna supply chain from
Taiwanese fishing vessels
to the Japanese market.



**Human
Rights
Now**

Credit

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Taiwan Association for Human Rights (TAHR) is an independent non-governmental organization and was founded on 10th December 1984 (International Human Rights Day). TAHR is the oldest human rights association in Taiwan. In its early years, due to the long-term enforcement of Martial Law, provisions of fundamental human rights protection under the Republic of China (ROC) Constitution had not been able to be put into practice. In response to this, TAHR focused its initial campaigns on advocating for democratic reforms to safeguard civil and political rights. Dedicated to strengthening human rights standards and protection mechanisms, TAHR addresses both domestic and international issues through close collaboration with global human rights organizations. Its advocacy spans a wide range of issues, with a particular focus on the rights of migrant workers and refugees.



Human Rights Now

Human Rights Now (HRN) is an international human rights NGO based in Tokyo, Japan. Established in 2006 by human rights professionals, including lawyers, scholars, and journalists, HRN is the first international human rights NGO originating from Japan. With a diverse membership of over 700 human rights specialists, HRN works across borders to protect and promote human rights worldwide, with a particular focus on Asia and the most serious human rights violations. In 2012, HRN obtained UN special consultative status and has since actively engaged in the UN decision-making process. Today, HRN has offices in Tokyo, Osaka, New York, and Geneva, and its activities extend globally, including in Asia and conflict-affected regions in the Middle East.

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This report is shaped by the dedication of these partners, and by the courage of the fishermen who shared their stories, as well as those who wished to but could not. We remain committed to fostering inclusive engagement and driving systemic reform across borders in order to amplify the voices of migrant workers and the communities that support them.

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Appendix 1 Summary of Testimonies of Former Crew Members of Taiwanese Distant-Water Tuna Vessels
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Executive Summary

This report highlights the structural human rights risks embedded in the supply chains connecting Taiwan's distant-water tuna fishing vessels to the Japanese market. Taiwan operates one of the world's largest distant-water fishing fleets, supplying much of its sashimi-grade tuna to Japan. Yet beneath this trade lies a structural system of exploitation, primarily targeting migrant workers from Indonesia, whose working conditions correspond to key International Labor Organization (ILO) indicators of forced labor.

These structural risks are further underscored by the visibility of transactional ties between Taiwanese seafood conglomerates and vessels suspected of forced labor, as well as their business relationships with Japanese fisheries-related companies. Moreover, interviews with former crew members of the You Fu and Yu Shun No. 668—both of which maintained such ties—confirmed serious abuses, including wage withholding, confiscation of identity documents, excessive working hours, isolation due to lack of communication facilities, and substandard living conditions. These findings further expose the systemic human rights risks within the tuna supply chain.

Field research conducted in Central Java, Indonesia, revealed that the pursuit of economic improvement was the primary motivation for seeking employment on foreign-flagged vessels. Recruitment was often influenced by community networks and “success stories” from returning crew. The research also identified systemic issues such as the dual licensing of manning agencies and budget constraints of local manpower offices, although Indonesia's Ministry for the Protection of Migrant Workers (KP2MI) has announced plans to implement new policies.

The situation of migrant fisher workers is further exacerbated by Taiwan's discriminatory “two-tier” employment system, which excludes overseas-recruited fishers from core labor protections such as fair wages, occupational safety, and access to remedies. Weak enforcement, restrictions on Wi-Fi access at sea, and ineffective grievance mechanisms contribute to what has been termed “structural invisibility,” thereby entrenching abuses over time. Although Taiwan's 2022 Action Plan on Fisheries and Human Rights acknowledges existing risks, it fails to address the exclusion of migrant fishers from labor protection frameworks.

As the primary import market for Taiwanese tuna, Japan wields considerable influence over these labor conditions but has yet to align its domestic framework with international standards. Japanese regulation has focused narrowly on resource management and the prevention of illegal, unreported, and unregulated (IUU) fishing, neglecting human rights protections. Comprehensive mandatory human rights due diligence (HRDD) legislation is absent, and Japan has yet to ratify the ILO Work in Fishing Convention (C188). A survey of 19 Japanese fisheries-related companies revealed that while some recognize tuna as a high-risk commodity, transparency in risk assessments and remedial measures remains extremely limited. In practice, grievance mechanisms accessible to migrant fishers are virtually nonexistent, and engagement with NGOs or trade unions is minimal.

This report therefore calls for urgent reform. The Taiwanese government must abolish its “two-tier” employment system, extend full labor protections to all fishers, guarantee communication rights at sea, and adopt binding HRDD legislation. The Japanese government must ratify ILO C188, expand traceability frameworks to include human rights, and introduce mandatory HRDD accompanied by import restrictions on products linked to abuse. Companies in both countries must move beyond reliance on audits, disclose risks and remedies transparently, and engage directly with workers and civil society.

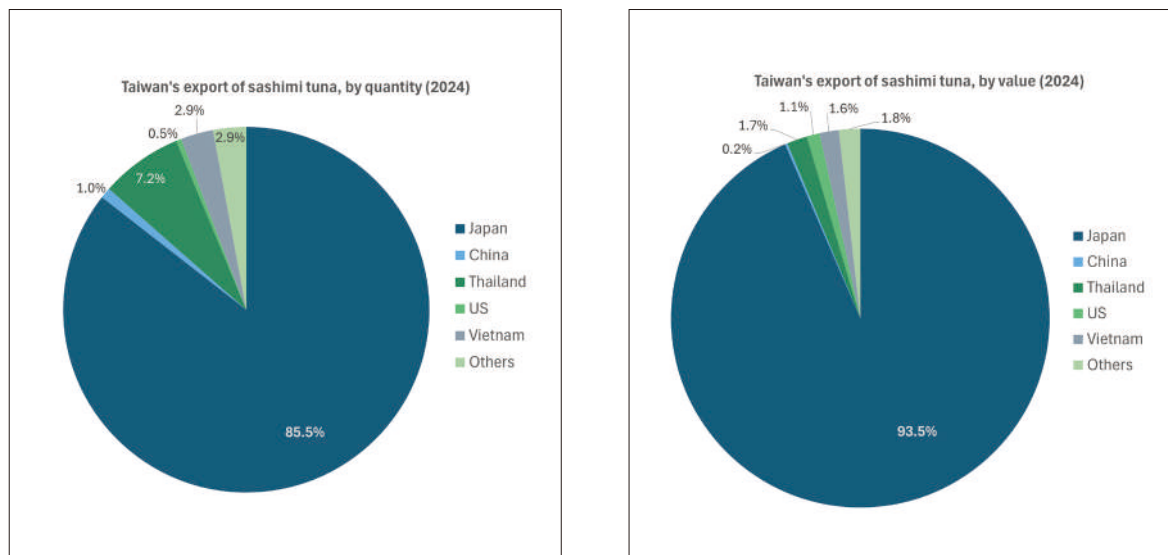
Only through coordinated action by states, companies, and civil society can transparency, accountability, and human dignity be restored to the global tuna supply chain.

Introduction

A slice of tuna on the world's dining tables often hides the harsh realities faced by the fishermen who risk their lives in the unforgiving sea. Despite the growing popularity of seafood as a healthy source of protein, few people know the reality of these workers behind dishes.

Japan is one of the world's leading tuna consumers, and its largest importer is Taiwan (18.4%).¹ According to data from the Taiwan Fisheries Agency, 85.5% of sashimi-grade tuna² exported from Taiwan in 2024 was destined for Japan, and 93.5% of Taiwan's fishing revenue for sashimi comes from the Japanese market, far exceeding other markets such as Vietnam and Thailand.³

Only through coordinated state, corporate, and civil society action can transparency, accountability, and human dignity be restored to the tuna supply chain.



¹ 令和5年水産白書 第1部1章 (4) 図表1-18 我が国の主な輸入水産物の輸入先国・地域: https://www.jfa.maff.go.jp/j/kikaku/wpaper/r05_h/trend/1/t1_1_4.html

² Tuna are found in all five oceans. Taiwanese distant water fishing vessels mainly catch five species for commercial use: bigeye, albacore, yellowfin, Pacific bluefin, and skipjack. Bigeye and Pacific bluefin are mostly sold for sashimi, while yellowfin and albacore are mainly traded as frozen products. Skipjack is primarily used for canned tuna.

In 2024, all tuna species exported to Japan made up 54.6% of Taiwan's tuna fishing revenue.

³ “民國113年(2024)漁業統計年報” (Fisheries Agency, Ministry of Agriculture, 2024), https://www.fa.gov.tw/view.php?theme=FS_AR&subtheme=&id=27

Taiwan is the country with the second largest number of Distant Water Fishing (DWF) vessels in the world and one of the major suppliers in the global seafood market.⁴ Taiwan's fishing fleet spans three major oceans (the Atlantic, Pacific, and Indian Oceans) and operates more than 1,000 vessels. In addition, Taiwan has the world's largest fleet of tuna longline fishing vessels, with an annual catch of approximately 158,000 tons in 2022.⁵ Longline fishing is a method of fishing in which bait and hooks are manually attached to branch lines every few dozen meters of a long line called a main line, which can be as long as 100 to 150 kilometres long, and then the line is released into the sea at an appropriate depth. There can be more than 3,000 hooks, and it can take more than 13 hours to pull them all up. This fishing method is apparently labor-intensive, but it allows the fish to be brought up without damaging them and has a low risk of bycatch (fish or other sea creatures that are caught unintentionally by people who are trying to catch other types of fish).

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“For one month, food supplies ran out, and we could only eat rice and bait fish. The fishermen could drink only desalinated seawater, as bottled water was not provided. Under such conditions, we usually worked 16 to 18 hours a day.”

— Former Indonesian crew member H, Yu Shun No. 668

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By nature of the industry, DWF workers are forced to live at sea for long periods of time, requiring strong mental and physical endurance to withstand the harsh climate and environment on board isolated from the land and family. In recent years, the number of ships employing foreigners has increased in Japan, Taiwan, and other countries due to the decline in the working population and the advancement of industry. Many foreign workers migrate from low- or middle-income countries and are often subject to exploitation due to their precarious residence status and limited language skills, as well as their economic motivation to support their family members. They often suffer from inadequate wages, excessive overtime, and hazardous health conditions, which are severe violations of fundamental human rights. Documented cases in recent years include overwork, work-related injuries, and withholding of wages in the industry.

The United Nations Guiding Principles on Business and Human Rights (UNGPs), which call on companies to respect human rights throughout their value chains, were adopted in 2011 for the purpose of eliminating human rights violations described above. The UNGPs leave the primary duty to protect human rights to

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⁴ Sally Yozell and Amanda Shaver, “Shining a Light: The Need for Transparency across Distant Water Fishing • Stimson Center” (The Henry L. Stimson Center, November 1, 2019), <https://www.stimson.org/2019/shining-light-need-transparency-across-distant-water-fishing/>.

⁵ “民國111年(2022)漁業統計年報” (Fisheries Agency, Council of Agriculture, 2022), https://www.fa.gov.tw/view.php?theme=FS_AR&subtheme=&id=22.

states but urge companies to fulfill their responsibilities to respect human rights and implement human rights due diligence (HRDD) for ensuring their accountability. The Japanese government also formulated a National Action Plan (NAP) on Business and Human Rights in 2020 and announced the Guidelines for Respecting Human Rights in Responsible Supply Chains (the Guidelines) in 2022. However, neither of them is an actual enforceable policy measurement as NAP is the roadmap for the government and the Guidelines are the voluntary guidance for companies. Hence there is a significant lag in their effectiveness compared to those where stronger policies including mandatory human rights due diligence (mHRDD) and the import ban on products associated with forced labor in Europe and the US. While more and more Japanese companies are aware of potential human rights risks in the seafood industry, there is a long way to go before their implementation of HRDD could adequately address human rights risks throughout their value chains including the level of disclosure with high transparency.

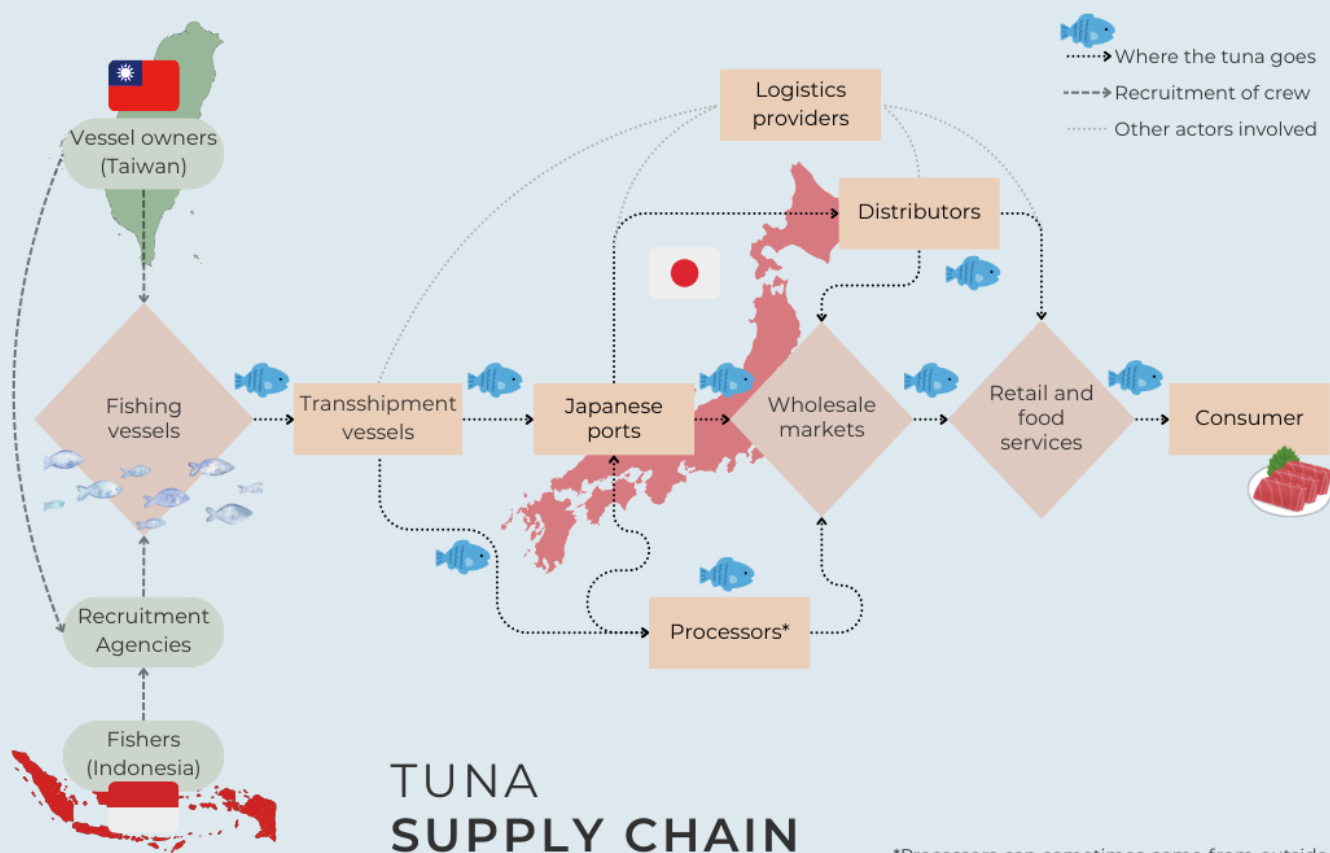
Japan is the largest export destination for tuna from Taiwan and is a market with great influence on Taiwan's DWF industry. Therefore, the Japanese government and Japanese companies are expected to use their leverage to address these exploitative labor practices faced by migrant fishers on Taiwanese DWF vessels. In order to increase transparency in the entire value chain and build an ethical and sustainable fishing industry, more proactive action should be taken.

This report, hence, unpacks human rights risks embedded in Taiwan's fishing industry, particularly in the distant-water fishing (DWF) sector, and explores areas for improvement from the perspectives of business and human rights. First, we map the tuna value chain from Taiwan to Japan, identifying both institutional and industry-specific risks. Second, we draw on field research in Indonesia regarding the recruitment process of migrant fishers, as well as testimonies from former crew members of Taiwan's distant-water tuna vessels, to shed light on the realities of forced labor and the structural risks behind them. Furthermore, we examine institutional challenges in Taiwan's DWF sector and recent policy responses, assessing both international criticism and the need for domestic reform. In addition, we review Japan's governmental responses and legal shortcomings, and analyse the results of a survey conducted with Japanese seafood companies regarding their implementation of human rights due diligence, thereby identifying corporate challenges and gaps in practice. Finally, based on these findings, we offer concrete recommendations to both governments of Taiwan and Japan, as well as to private sector actors, in order to build a sustainable seafood value chain that fully respects human rights.

Chapter 1

Human Rights Risks in Tuna Supply Chains

1.1. Mapping the Tuna Supply Chain: Taiwan to Japan



*Processors can sometimes come from outside of Japan, for example from Indonesia, Thailand, and Vietnam.

Processing can entail anything from cleaning, freezing, storing, packaging, etc.

The tuna supply chain is a complex network involving multiple stakeholders, each playing a central role in bringing tuna from the ocean to consumers. This map illustrates the various stages and actors in the supply chain, highlighting the flow of tuna and the challenges related to traceability.

The tuna supply chain typically begins with Indonesian fishers, who are recruited through local agencies often working in coordination with Taiwanese counterparts. Taiwanese vessel owners oversee fishing operations, with transshipment vessels transferring the catch—often while still at sea—to larger ships or offshore processing hubs. Processing may be carried out in countries such as Indonesia, Thailand, and Vietnam before heading to Japan.⁶ Tuna is then landed at Japanese ports, where initial quality checks and processing may also occur. Logistics providers handle transportation to distributors, who supply tuna to retail outlets and food service providers. Finally, the tuna reaches consumers through supermarkets and restaurants, completing the journey from ocean to table.

Traceability in the tuna supply chain is challenging due to the involvement of multiple stakeholders across different countries:

- Lack of standardization and regulatory differences: Countries and companies often use varying systems for tracking, reporting, and labeling tuna. Inconsistent standards and differing regulations on fishing practices and sustainability create gaps in traceability and make oversight more difficult.
- Complex supply chain structure: Tuna may be caught in international water by one country's vessel, processed in another country, and sold in yet another. With numerous actors involved, each with different practices and levels of transparency, it becomes difficult to track the origin of the tuna.
- Illicit fishing: Illegal, unreported, and unregulated (IUU)⁷ catches may enter the supply chain without proper documentation, undermining both legality and sustainability efforts - further complicating traceability.
- Technological gaps: Some tools⁸ can improve traceability, but adoption is limited, especially among small-scale fishers. Poor internet connectivity at sea further prevents real-time data transmission, creating gaps that reduce traceability and increase the risk of IUU catches entering the supply chain.

Only through coordinated state, corporate, and civil society action can transparency, accountability, and human dignity be restored to the tuna supply chain.



⁶ Such as Aneka Tuna PT Indonesia, Thai Inaba Foods Co., Ltd. in Thailand, and Vietnamese Coral Triangle Processors. Shark Guardian, "Empty Promises, Empty Oceans: Fong Chun Formosa (FCF) Fishery Company's Sustainability Commitments", October 2024. <https://bit.ly/FCF-EmptyPromisesEmptyOceans>.

⁷ According to the United Nations, approximately 1 in every 5 fish caught comes from IUU fishing. UN, "International day against illegal fishing", <https://www.un.org/en/observances/end-illegal-fishing-day>

⁸ Such as blockchain or Radio Frequency Identification (RFID) - a technology that uses electromagnetic fields to automatically identify and track tags attached to objects.

1.2. The Dangers of Transshipment in Distant Water Fishing

Transshipment involves transferring the catch from a fishing vessel to a carrier vessel, either at sea or in port. Every year, thousands of fishing vessels transship tuna, mackerel, squid, crab, and other marine species to refrigerated cargo ships known as “carrier vessels” or “reefers”.

While transshipment is a long-standing practice that reduces the time of travel and fuel costs required to transfer the catch to ports, enabling producers to deliver fresher catch and command higher prices, it also poses serious risks. Transshipment at sea, in particular, has been widely criticized for enabling illegal, unreported, and unregulated (IUU) fishing products to enter the supply chain. It also facilitates overfishing by allowing vessels to remain at sea for extended periods and is increasingly associated with grave human rights abuses, including recent evidence of modern slavery, labor abuses, and human trafficking.⁹

“*There was no means of communication such as Wi-Fi on board, and I could only contact my family when the vessel called at port. When we arrived in Samoa, I bought a SIM card and was finally able to contact my family, and that was when I first learned of my father's death.*”

— Former Indonesian crew member A, You Fu

”

Recent investigations and NGO reports criticise this practice as it creates a closed environment for crew, especially migrant workers, who may remain at sea for months or even years. This isolation obstructs the workers' access to legal aids, grievance mechanisms, and remedies.¹⁰ The lack of Wi-Fi or satellite connectivity on many vessels further worsens this problem, leaving workers unable to contact family, report abuse, or seek help.

Despite growing evidence and calls for reform, the Western and Central Pacific Fisheries Commission (WCPFC) has again failed to adopt meaningful regulations on transshipment at sea.¹¹ This regulatory gap undermines efforts to ensure transparency, traceability, as well as crew welfare in DWF operations.

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⁹ Claire van der Geest. 2023. Transshipment: Strengthening Tuna RFMO Transshipment Regulations (Version 6). ISSF Technical Report 2023-06. International Seafood Sustainability Foundation, Pittsburgh, PA., USA 8

¹⁰ Mosteiro Cabanelas, A. (ed.), Quelch, G.D., Von Kistowski, K., Young, M., Carrara, G., Rey Aneiros, A., Franquesa Artés, R., Ásmundsson, S., Kuemlangan, B. and Camilleri, M. 2020. Transshipment: a closer look An in-depth study in support of the development of international guidelines. FAO Fisheries and Aquaculture Technical Paper No. 661. Rome, FAO. p44 <https://doi.org/10.4060/cb2339en>

¹¹ Chris Chase, “WCPFC establishes electronic monitoring, crew labor standards but fails again on transshipment”, December 9, 2024. <https://www.seafoodsource.com/news/environment-sustainability/wcpfc-establishes-electronic-monitoring-crew-labor-standards-but-fails-again-on-transshipment>

1.3. International Frameworks on Human Rights Risks in the Distant Water Fishing Industry

Workers in the fishing industry, particularly those employed on distant-water fishing (DWF) vessels, are highly vulnerable to human rights abuses, often working in isolated environments where monitoring and regulation are weak or absent. This section provides an overview of the main human rights risks faced by fishers, grounded in international legal and human rights standards. These frameworks inform the focus of the subsequent case studies and help contextualize the field findings.

1.3.1. Forced Labor (ILO Standards)

The ILO Forced Labor Convention, 1930 (No. 29) defines forced labor as “all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily” (Article 2(1)). The ILO has identified 11 indicators of forced labor to reflect its real-world manifestations. Importantly, the ILO notes that the presence of even one of these indicators may be sufficient to raise concern about forced labor.

1.3.2. Work in Fishing Convention (ILO Convention No. 188)

The ILO Work in Fishing Convention, 2007 (No. 188) provides a binding framework to safeguard the rights and welfare of all fishers on commercial vessels. It sets out minimum standards for occupational safety and health, including access to medical care at sea and ashore, guaranteed rest periods, and written work agreements that ensure fair and transparent employment conditions.

The Convention also mandates that fishing vessels be constructed and maintained to ensure decent living conditions, including adequate accommodation, nutrition, and access to communication. It requires effective regulation of recruitment practices and the establishment of complaint mechanisms, thereby aiming to prevent exploitation, such as forced labor and human trafficking, particularly among migrant and undocumented fishers.

Further provisions address minimum age requirements, medical certification, and social security protections in line with other sectors. It also clarifies the legal responsibilities of vessel owners and skippers, including prohibitions on child labor. Together with the Work in Fishing Recommendation, 2007 (No. 199), Convention No. 188 consolidates and updates earlier ILO standards, offering a critical tool for protecting the dignity and safety of fishers globally.

| ILO Indicator | Description |
|--|--|
| 1. Abuse of vulnerability | Exploiting a worker's disadvantaged position (e.g. poverty, migration status, language barriers) to compel work. |
| 2. Deception | The failure to deliver what has been promised to the worker, either verbally or in writing. This can be misleading about job terms, wages, conditions, or legal status during recruitment or employment. |
| 3. Restriction of movement | Preventing or controlling a worker's ability to leave the workplace or accommodation, through physical confinement, locked premises, or the presence of guards, as well as coercive rules or threats. |
| 4. Isolation | Deliberately cutting workers off from contact with others, including family, community, or external support networks. This can be physical (remote worksites, at-sea confinement) or social (language barriers, confiscation of communication devices), making it harder to seek help. |
| 5. Physical and sexual violence | Using or threatening physical harm or sexual abuse to control workers. |
| 6. Intimidation and threats | Applying psychological pressure to instil fear and ensure compliance. Threats may target the worker's job, reputation, safety, or legal status, and can extend to family members. |
| 7. Retention of identity documents | Confiscating or withholding passports, work permits, or other personal documents to restrict a worker's freedom of movement or ability to change jobs, access services, or leave the country. |
| 8. Withholding of wages | Deliberately delaying, underpaying, or refusing to pay wages to compel a worker to remain in the job. This can include making unjustified deductions or linking payment to completion of a contract under coercive conditions. |
| 9. Debt bondage | Binding a worker to employment through debts they cannot realistically repay, often arising from inflated recruitment fees, loans, or deductions. The debt is used as leverage to prevent the worker from leaving. |
| 10. Abusive working and living conditions | Imposing conditions that violate legal standards or human dignity, such as unsafe environments, degrading treatment, inadequate food or shelter, or denial of rest. |
| 11. Excessive working hours | Requiring work far beyond legal or agreed limits, without genuine consent, and often without proper compensation. Refusal may lead to penalties, dismissal, or other forms of retaliation. |

1.3.3. Human Trafficking (Palermo Protocol)

The UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children (known as the Palermo Protocol) defines trafficking in persons as:

“the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability, or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.”

Importantly, under Article 3, the consent of the victim is irrelevant where any coercive or deceptive means have been used. This is especially significant in the context of fishing, where migrant workers may be deceived or coerced into exploitative employment on DWF vessels.

1.3.4. Illegal, Unreported and Unregulated (IUU) Fishing and Human Rights

IUU fishing is frequently linked to forced labor and human trafficking. Operators of IUU vessels often employ workers under abusive conditions to cut costs and evade oversight. Workers on IUU fishing vessels may be subjected to poor working conditions, wage withholding, physical abuse, excessive time at sea, and complete isolation, with no legal or physical means of escape.

Addressing IUU fishing requires a holistic, human rights-based approach. International responses include Sustainable Development Goals (SDGs) such as Target 8.7, which calls for eradicating forced labor, and Target 14.4, which aims to end overfishing, IUU fishing, and destructive fishing practices. Regional Fisheries Management Organisations (RFMOs) implement measures to combat IUU fishing, including port state controls and monitoring, control, and surveillance systems. National legislation and policies also play a crucial role, with countries implementing laws and policies to combat IUU fishing and forced labor, such as vessel monitoring systems, labor inspections, and stronger enforcement mechanisms.

Chapter 2

Field Research Findings: Case Studies and Workers' Voices

2.1. Overview of Case Studies

The following stories illustrate the harsh and often hidden realities faced by migrant fishers aboard Taiwanese distant water fishing vessels. Each case reveals structural failures, whether wage theft, deception or prolonged isolation, constituting abuses that these fishers have faced. These narratives, grounded in documented reports and investigations, introduce the human context behind systemic abuse in the fishing industry.

2.1.1. You Fu (鉤富號): Fifteen months at sea, fifteen months without pay

On August 7th, 2024, ten Indonesian fishermen alleged at a press conference in Taipei, Taiwan, that they were owed 11 to 15 months wages, totaling US \$80,850. These fishers worked on You Fu 鉤富, a Taiwanese-flagged distant water fishing vessel. Without access to Wi-Fi services on board, the fishers were unable to get in touch with their families or verify whether their families had received payments of their wages.¹² You Fu returned to Taiwan on July 15th, 2024, after 15 months in the Pacific Ocean.¹³

The fishermen pointed out in the press conference the harsh working conditions on You Fu. They stated that they agreed to a six-month contract to work in the Pacific Ocean but ended up working for as long as fifteen months in American Samoan waters.¹⁴ After boarding You Fu, they had to hand over their passports and soon realized that there was not enough bottled water to drink and almost no medications or medical equipment.¹⁵ The beds they slept on were infested by bedbugs, leaving their bodies itchy.¹⁶ The fishers were often scolded and intimidated by You Fu's then-captain, and, on certain days of work, were only allowed to sleep fewer than four hours.¹⁷ Food deliveries to You Fu were delayed on several occasions, during which the fishers could only eat fish bait and instant noodles.¹⁸



¹² "Ten Migrant Indonesian Fishers Owed Wages Ranging from 11 to 15 Months," Taipei Times, August 9, 2024, <https://www.taipeitimes.com/News/taiwan/archives/2024/08/09/2003821992>.

¹³ 楊鵬如, "台灣遠洋漁船「鉤富號」欠薪15個月 印尼漁工控訴血汗勞動," 公民行動影音紀錄資料庫, August 8, 2024, <https://www.civilmedia.tw/archives/127531>.

¹⁴ Ibid. ¹⁵ Ibid.

¹⁶ "Ten Migrant Indonesian Fishers Owed Wages Ranging from 11 to 15 Months," Taipei Times, August 9, 2024, <https://www.taipeitimes.com/News/taiwan/archives/2024/08/09/2003821992>.

¹⁷ 楊鵬如, "台灣遠洋漁船「鉤富號」欠薪15個月 印尼漁工控訴血汗勞動," 公民行動影音紀錄資料庫, August 8, 2024, <https://www.civilmedia.tw/archives/127531>.

¹⁸ "Ten Migrant Indonesian Fishers Owed Wages Ranging from 11 to 15 Months," Taipei Times, August 9, 2024, <https://www.taipeitimes.com/News/taiwan/archives/2024/08/09/2003821992>.

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“In addition to reprimands from the captain, I had witnessed a colleague being forced to return home after being considered incompetent. Because of this, I was constantly working under the fear of losing my job.”

— Former Indonesian crew member A, You Fu

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On returning to Taiwan, the fishers reached out for help from civil society groups and government agencies.¹⁹ On July 29th, the labor brokers proposed to first give each worker US \$2,000 and pay the rest of their delayed wages once they continued working on August 10th.²⁰ This proposal infuriated the fishers, who decided to hold a press conference in Taipei to bring attention to their plight. It was only before the conference when the Fisheries Agency and shipowner promised to complete wage payment by the end of the day (August 9th).²¹ They received full amounts of their wages following the press conference.²²

In April 2025, Taiwanese prosecutors issued a non-prosecution decision in the case of the You Fu vessel, whose owner was accused of labor exploitation under Taiwan’s Human Trafficking Prevention Act. Despite the crew’s wages being delayed and identity documents withheld during 15-months at sea, authorities concluded there was insufficient evidence of criminal intent. However, financial records reviewed during the investigation revealed that proceeds from the vessel’s catch were remitted by FCF Co., Ltd., one of Taiwan’s largest seafood conglomerates - suggesting the vessel’s integration into formal supply chains.

Recent independent reports highlight that this trade is not without risks. In late 2024, Shark Guardian alleged that FCF continues to source from fleets associated with labor abuses and environmental violations, despite its sustainability pledges - which FCF dismissed as being outdated.²³ However, as revealed through interviews with former crew members of the You Fu, our investigations found that labor exploitation linked to FCF continues to persist. Additionally, Greenpeace and SBMI’s 2024 Seabound 3 report²⁴ documented forced labor and illegal fishing on vessels supplying Bumble Bee (owned by FCF), raising questions about how much of this risk extends to FCN (FCF’s Japanese subsidiary) operations. Meanwhile, in early 2025, a lawsuit filed in California accused Bumble Bee of profiting from “modern-day slavery” on distant-water vessels, underscoring the legal and reputational consequences now facing FCF and its subsidiaries.²⁵

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¹⁹ 楊鵬如, “台灣遠洋漁船「銷富號」欠薪15個月 印尼漁工控訴血汗勞動,” 公民行動影音紀錄資料庫, August 8, 2024, <https://www.civilmedia.tw/archives/127531>.

²⁰ Ibid. ²¹ Ibid. ²² Ibid.

²³ Shark Guardian, “Shark Guardian investigation: Global tuna giant Fong Chun Formosa fails to act on shocking environmental and human rights”, November 5, 2024, <https://www.sharkguardian.org/post/fong-chun-formosa-investigation>.

²⁴ Tanya Brooks, “Forced labor linked to Bumble Bee supply chain”, Greenpeace, December 10, 2024, <https://www.greenpeace.org/usa/forced-labor-linked-to-bumble-bee-supply-chain/>.

²⁵ Tanya Brooks, “Fishers sue Bumble Bee Foods for years of forced labor”, Greenpeace, March 12, 2025, <https://www.greenpeace.org/usa/fishers-sue-bumble-bee-foods-for-years-of-forced-labor/>; Tanya Brooks, “ Indonesian fishers respond to Bumble Bee’s attempt to dismiss forced labor suit” Greenpeace, August 1, 2025 <https://www.business-humanrights.org/en/latest-news/taiwan-fcf-denies-shark-guardians-allegations-of-labor-environmental-violations-says-claims-outdated/>

While FCF participates in initiatives like the “Seafood Task Force” to improve transparency and recruitment practices,²⁶ external benchmarks paint a different picture: the World Benchmarking Alliance’s 2024 Social Benchmark gave FCF a score of just 2.5/20, with 0/10 on human rights due diligence, reflecting ongoing systemic weaknesses in governance and accountability.²⁷ There is currently no public evidence that FCN applies stricter safeguards in Japan, particularly concerning tuna sourced from high-risk longline fleets.

FCN’s role highlights how Taiwanese and Japanese companies are tightly interwoven in tuna supply chains. Past investigations—most notably a 2019 Greenpeace supply chain analysis—suggested that FCN and its parent, FCF, supplied tuna to several major Japanese firms, including: TOYO REIZO Co., Ltd., ITOCHU Corporation, and Nissui Corporation.²⁸

This network means that tuna caught by Taiwan’s distant-water fleet—often transferred through opaque transshipment practices—enters Japan via FCN and its partners, reaching both retail and wholesale markets. However, it is important to note that the Greenpeace report is now several years old, and there is a lack of updated public disclosure. This points to an ongoing transparency gap in the tuna trade: even as allegations of labor abuse and IUU fishing linked to FCF continue to surface in more recent NGO reports and legal cases, there remains little traceable data on how tuna flows into the Japanese market through FCN and its corporate partners.

This FCF-FCN case is one example of how integrated Taiwanese-Japanese tuna supply chains can transmit human rights and environmental risks across borders. By tracing the linkages between FCF, FCN, and their Japanese partners, it becomes clear that the issues identified in the You Fu case are not isolated incidents. Instead, they are part of a broader transnational supply chain that lacks robust HRDD and accountability. Closing these gaps will require coordinated reforms in both Taiwan and Japan, stronger enforcement, and a shift from voluntary to binding compliance.



²⁶ Fish Focus, “FCF CO. LTD. HOSTS INFLUENTIAL SEAFOOD TASK FORCE ON RESPONSIBLE RECRUITMENT”, 2024, <https://fishfocus.co.uk/fcf-co-ltd-hosts-influential-seafood-task-force/>.

²⁷ Note: assessed in 2023, Social Benchmark | World Benchmarking Alliance
<https://www.worldbenchmarkingalliance.org/publication/social/companies/fcf/>.

²⁸ Greenpeace, “Misery at sea: Human suffering in Taiwan’s distant water fishing fleets”, May 24, 2018, <https://www.greenpeace.org/aotearoa/publication/misery-at-sea/>.

2.1.2. You Fu No. 668 (裕順668號): Stranded ashore, forgotten in port

Twelve foreign crew members of the *Yu Shun No. 668* found themselves stuck in Taiwan during October 2024 with no pay, no way home, and no one taking responsibility.

The ship's owner had gone bankrupt. The Taiwanese tuna longliner, registered in Kaohsiung and once part of a Japanese-associated tuna fleet, was no longer operational. The migrant fishers, however, remained stranded in Taiwan. With unpaid wages and no job, they lived in accommodation where utilities were sporadically cut off. Food was scarce. They waited, as the situation stretched from weeks to months.²⁹

The Taiwanese authorities launched an investigation into potential violations, including forced labor and human trafficking. Taiwan's Control Yuan, the government's top supervisory body, formally intervened with an investigation.³⁰ Supervisory committee member Ji Huirong questioned whether the Fisheries Agency had fulfilled its duty to protect the rights of these workers with sufficient urgency and requested an official investigation. Ji publicly stated that the facts of the case, particularly the prolonged unpaid wages and lack of intervention, might meet the threshold for human trafficking under Taiwanese law.

Further concerns arise from the vessel's link to *SINGAZ JAPAN株式会社*, a Japanese company that includes *Yu Shun No. 668* in its fleet of ultra-low temperature longliners.³¹ This transnational business relationship underscores the potential cross-border nature of the vessel's operations and raises questions about the shared responsibility of foreign buyers and operators when human rights abuses occur.

The events surrounding *Yu Shun No. 668* demonstrate not only the vulnerability of migrant fishers in the absence of employer accountability but also the limits of current government oversight mechanisms in ensuring timely recourse when abuse occurs.



²⁹ CNA, “裕順668號外籍船員遭長期欠薪 監委申請自動調查 | 政治 | 中央社 CNA”, March 6, 2025, <https://www.cna.com.tw/news/aip/202503060200.aspx>

<https://www.cna.com.tw/>

³⁰ The Control Yuan, “我國籍裕順668號漁船12名外籍船員 因船東破產積欠薪資損及權益 監察委員紀惠容申請自動調查”, March 6, 2025, https://www.cy.gov.tw/News_Content.aspx?n=125&s=32695

³¹ SINGAZ JAPAN 新雅日本, “超低溫金槍魚延繩釣船隊”<https://singaz-jp.com/zh/service/index.html>

2.2. Recruitment Process in Indonesia and Key Challenges

In order to better understand the realities of crew recruitment for overseas fishing vessels in Indonesia, field research was conducted between June and July 2025 for a week. This study included visits to Tegal and Pemalang in Central Java Province, where many manning agencies are located. Focus Group Discussions (hereinafter, FGDs³²) were conducted with former crew members who had experience working aboard Taiwanese DWF vessels. In addition, interviews were conducted with manning agencies³³ responsible for the recruitment and placement of fishers on behalf of vessel owners and ship management companies, as well as with local manpower offices responsible for the protection of workers and the management of employment opportunities. Furthermore, the research team visited the Directorate of Placement of Migrant Commercial Vessel Crews and Migrant Fishing Vessel Crews within the Ministry of Protection of Migrant Workers of Indonesia (hereinafter, KP2MI) in Jakarta, to obtain information on policies scheduled to be implemented in the future.

2.2.1. Background and Current Situation of Job Placement

The following outlines the realities of job placement in Indonesia, as revealed through the FGDs. The education level of FGD participants was mostly secondary school, as prospective migrant fishers must have completed at least secondary school to obtain a Basic Safety Training (BST) certificate. In particular, in Tegal, it became evident that educational background and age—combined with local employment practices—significantly restricted access to labor opportunities. For example, individuals with only primary education faced limited options, such as fishing work or informal sector jobs, whether domestically or abroad, whereas those who had completed senior high school were more likely to find employment with formal companies. This revealed a clear distinction in employment possibilities based on educational attainment. Age was also a factor: older workers were often perceived as individuals who “demand higher wages,” making it more difficult for them to obtain local employment. In contrast, younger individuals were reported to have greater access to job opportunities.

Concerning work experience prior to overseas employment, only a few participants had previously worked in the fisheries sector; most had backgrounds in construction, factory labor, or food service. Employment on overseas fishing vessels was perceived as a relatively high-income option and widely recognized as a means to improve living standards. Many participants cited their motivation for seeking employment as fishing vessel crew members as securing family living expenses and education fees,



³² A qualitative research method that gathers a small group of participants to share their opinions and experiences. In this study, the aim was to gain a multifaceted understanding of the realities and challenges of fishing vessel labor through participants' sharing of experiences and interactive discussions.

³³ A licensed intermediary formally registered with the government, responsible for handling contractual procedures, travel arrangements, pre-departure training, and providing explanations of employment conditions.

saving for marriage, funding home construction, and accumulating capital for future business ventures. Economic improvement was consistently cited as the primary factor.

Information about employment opportunities on overseas fishing vessels was typically obtained through informal channels, such as introductions by friends, neighbors, and relatives, as well as the sharing of so-called “success stories” by former crew members played a significant role. The involvement of social media—particularly Facebook—was also influential, both in the form of direct promotion by manning agencies and through the activities of so-called brokers³⁴ who mediate between manning agencies and workers. These sources tended to highlight only positive experiences, while providing insufficient or almost no details regarding risks or potential disadvantages. As a result, workers often made decisions based on biased and incomplete information.

Many issues were also reported regarding the actual conditions of the recruitment process itself. Some participants recounted being compelled to surrender their original identity cards and passports to manning agencies during the employment procedures, and in some cases, exorbitant fees were demanded for their return. In addition, there were cases where identity documents and passports were withheld by agencies if workers terminated their contracts early or refused to depart. Various costs collected by intermediaries and agencies were also described as being opaque, with workers rarely receiving adequate explanations during the contract stage. Regarding contracts themselves, there were cases where workers were required to sign documents written in Chinese immediately before departure, without being given time to review the content, effectively exploiting their vulnerability to leave without understanding the terms. Workers thus had little opportunity to fully comprehend their contractual obligations and, being in a disadvantaged position, were compelled to accept unfavorable conditions unilaterally. Furthermore, there were confirmed cases of wage deductions inconsistent with initial explanations, as well as delayed payments.

Taken together, the lack of transparency in financial obligations, inadequacies in contract procedures, the unilateral control exerted by agencies over the management of personal documents, and workers’ limited access to language and information places migrant workers in a structurally subordinate position.

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“At the Indonesian manning agency, the contract explanation was limited to wages, with no explanation about the vessel’s conditions or the actual work. Later, after arriving in Taiwan, and again while in Samoa during fishing operations, I was told to sign additional contracts. I was not given any time to read them and was simply told to sign.”

— Former Indonesian crew member C, You Fu

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³⁴ Operating without formal licensing, these brokers recruit workers through village networks or social media.

Among the FGD participants, there were “positive” or “success” cases in which individuals received their contractually stipulated wages in full, were satisfied with the working conditions onboard, and achieved an improvement in their economic situation. While these accounts underscore the potential for positive outcomes, they do not negate the broader structural deficiencies within the recruitment system for overseas fishing vessel employment. Moreover, when compared to the standards set forth in ILO Convention No. 188, even these positive cases fall short, indicating that improvements in economic conditions alone cannot be equated with the fulfillment of fundamental labor rights. Unless the systemic issues are comprehensively addressed, workers will continue to face potential risks of serious human rights violations.

2.2.2. Current Practices of Manning Agencies

Interviews were conducted with manning agencies responsible for dispatching crew members to foreign-flagged fishing vessels, including those from Taiwan. The focus was on two distinct agencies based in Tegal and Pemalang. Both agencies conducted certain checks prior to concluding contracts with crew members; however, differences were observed in their content.

At the agency in Pemalang, in addition to providing explanations about working conditions on board and the cultural characteristics of the destination countries, a physical aptitude test was conducted to assess the workers’ physical strength and adaptability. In contrast, the agency in Tegal focused primarily on sharing contract terms, providing information on vessel type, wage levels and payment methods, as well as communication conditions on board.

There were also differences observed in how workers secured funds to cover pre-employment costs such as passport issuance, medical examinations, and transportation expenses to Jakarta, the capital. In Pemalang, manning agencies encouraged workers to secure the necessary funds through loans from banks or relatives. In contrast, in Tegal, in order to avoid the burden of high interest rates, support from family members or loans directly from the recruitment agencies themselves were recommended. Loans provided by manning agencies were structured to be repaid through deductions from workers’ salaries. In all cases, the burden of these costs ultimately fell on the workers themselves, creating a system in which debt was an inevitable prerequisite for employment.

Both agencies stated that they do not engage or involve brokers in their operations. Particularly in Pemalang, information sharing and cautionary measures were conducted within the agency’s network regarding exploitative brokers who demanded excessive intermediary fees.

2.2.3. Policies of the Central and Local Governments

In interviews with local manpower offices, it was revealed that workers from rural areas often lacked access to appropriate consultation channels or remedies when problems arose, resulting in many cases where the damages remained unresolved. Consequently, the necessity was emphasized for local administrations and labor unions to conduct preventive awareness-raising activities prior to overseas employment. In practice, local manpower offices and the Union of Indonesian Migrant Workers (SBMI) have been collaborating to visit villages, where they carry out activities to improve awareness of formal recruitment procedures and risk recognition. In Pemalang, the enactment of village-level ordinances for the protection of migrant workers is also underway. Furthermore, Migrant Resource Centres have been established within local labor offices to facilitate mediation in labor-related disputes.³⁵

However, a common challenge in both regions is the lack of sufficient budget allocations, which limits the implementation of awareness-raising activities. Another concern is the dual structure of the licensing system for manning agencies, which has led to institutional ambiguity and confusion at the local level.

In relation to these issues, interviews conducted with the KP2MI in Jakarta provided insights into the current state of institutional operations and future policy directions concerning migrant workers in the fishing vessel sector. KP2MI was only recently established in 2024, having been elevated from the former Agency for the Protection of Migrant Workers (BP2MI), and its concrete policies and operational guidelines as a ministry are still under development. Among the most pressing concerns is the dual structure of the licensing system for manning agencies. At present, while approximately 300 agencies hold "SIUPPAK" licenses under the Ministry of Transportation, only about 30 agencies have obtained "SIP3MI" licenses under KP2MI. Moving forward, KP2MI has expressed its intention to unify the licensing system under "SIP3MI", enabling centralized oversight of all migrant workers, including fishing vessel crews, through coordination with other relevant ministries.

Furthermore, KP2MI indicated its intention to strengthen government involvement in the overall pre-departure process for migrant workers. Until now, these pre-departure procedures had been managed entirely by manning agencies. However, under the forthcoming system, government-led measures are expected to include mandatory orientations, the introduction of pre-departure tests, verification of medical checkups, and confirmation of required documentation. Nevertheless, concerns were raised that such systems might prolong the preparation period for departure, highlighting the need to reconcile system design with practical realities on the ground. In response to the shift in brokers' activities from direct recruitment at the village level to methods conducted via social media platforms, KP2MI has established a Cyber Network Task Force to address improper solicitation practices occurring within the online sphere.



³⁵ ILO (2024) "New Migrant Worker Resource Centre supports safer migration for Indonesian migrant fishers" <https://www.ilo.org/resource/news/new-migrant-worker-resource-centre-supports-safer-migration-indonesian>

2.3. Interview Analysis: Voices of Former Crew Members

Human rights risk assessments in industries such as DWF are critical because of the unique and often severe labor-related risks faced by workers at sea. As outlined earlier, the ILO Indicators of Forced Labor offer a clear, structured lens for identifying such abuses. Here, we apply those indicators to first-hand accounts from crew members, revealing how systemic vulnerabilities translate into concrete violations in practice.

In September and October 2024, individual interviews were conducted in Taiwan with seven former Indonesian crew members of the Taiwanese-flagged tuna fishing vessel You Fu. In April 2025, an additional testimony was obtained online from one former Indonesian crew member of Yu Shun No. 668. An overview of testimonies from former crew members, organized according to the 11 ILO forced labor indicators described above, is provided in Appendix 1.

Based on the testimonies of the eight workers collected in this study, an analysis was conducted in relation to the ILO's 11 indicators of forced labor. As a result, situations corresponding to all indicators were reported, with the exception of Indicator 5: Physical and sexual violence. However, the applicability of the ILO forced labor indicators cannot always be determined in a straightforward manner. Even when workers themselves do not perceive their situation as severe, an assessment that takes into account broader social and structural conditions may reveal clearer indications of forced labor. Below are the testimonies and corresponding assessments obtained for each indicator.

Fishing workers

| ILO Indicators | A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|
| 1. Abuse of vulnerability | | | | | | | | |
| 2. Deception | | | | | | | | |
| 3. Restriction of movement | | | | | | | | |
| 4. Isolation | | | | | | | | |
| 5. Physical or sexual violence | | | | | | | | |
| 6. Intimidation and threats | | | | | | | | |
| 7. Retention of identity documents | | | | | | | | |
| 8. Withholding of wages | | | | | | | | |
| 9. Debt bondage | | | | | | | | |
| 10. Abusive working and living conditions | | | | | | | | |
| 11. Excessive overtime | | | | | | | | |

Indicator Intensity Scale

| | | | | |
|-----------|-----------------|----------------|---------------|-----------------|
| No signal | Emerging signal | Notable signal | Strong signal | Critical signal |
|-----------|-----------------|----------------|---------------|-----------------|

(1) Abuse of vulnerability

The interviews revealed that some crew members paid large sums of money to brokers before departing Indonesia and boarded the vessels without sufficient knowledge of Taiwan's legal system or the terms of their employment contracts.

For example, Crew Member F testified that he had received no explanation whatsoever regarding social security systems, such as health insurance, pension, or labor insurance. This lack of legal knowledge, when combined with other elements of forced labor such as delayed wage payments and the confiscation of passports, created a situation in which workers had no choice but to accept exploitation.

Furthermore, as elaborated in Chapter 4, from an institutional perspective, the Taiwanese government does not provide adequate protection of labor rights for distant-water fishing (DWF) workers. In addition, because workers' employment permits and residency status are controlled by their employers, migrant workers are placed in a structurally vulnerable position. Accordingly, this indicator applies not only on the basis of individual testimonies but also, from the standpoint of institutional conditions, to nearly all migrant workers engaged in distant-water fisheries.

(2) Deception

Multiple testimonies revealed significant discrepancies between the explanations given at the time of signing the employment contract and the actual working conditions.

On You Fu, although workers were told that wages would be "remitted every month," in reality, payments were made in a lump sum only upon returning to port in Taiwan, with delays lasting between 9 and 15 months. Crew Member B testified that although the pay slip stated, "USD 250 will be remitted monthly to the family" under the contract, no remittances were actually made. Furthermore, Crew Member C stated that before departing Indonesia, he was told that "wages would be transferred into a bank account," but upon arrival in Taiwan, the method was changed to "cash in hand."

These acts of deception meant that workers, after traveling and starting employment based on the contract terms they trusted, were confronted with discrepancies between expectation and reality. As a result, they were forced into situations where they could not quit and had no choice but to continue working.

(3) Restriction of movement

In all testimonies, passports were held either by the vessel owner or the captain, with some workers granted access only to copies or photographs of their documents. While some crew members testified that disembarkation or movement at port was possible with a copy or photo of their passport, others stated that because they did not possess the original passport, their movement at port was restricted.

The withholding of passports was not merely an administrative measure but also carried a high potential to serve as a strong means of control, effectively depriving workers of their freedom of movement.

(4) Isolation

Onboard, means of communication were completely restricted, and only brief contact was allowed at port calls. As a result, workers were cut off from their families and the outside world, forced into subordination within a closed environment.

For example, Crew Member A testified that, since Wi-Fi was not available on the vessel and there was no means of external communication, he was only able to contact his family after purchasing a SIM card at port. At that time, he learned of his father's death—several months after it had occurred—illustrating the severity of the communication cutoff. Isolation imposed a significant psychological burden, blocked the possibility of reporting abuses to the outside or seeking remedies, and can be considered a means to suppress complaints. Furthermore, combined with other elements of control, such as passport confiscation and non-payment of wages by the vessel owner or captain, isolation reinforced the structure of exploitation.

(5) Physical and sexual violence

No testimonies confirmed direct physical or sexual violence; however psychological violence was reported as a routine part of the overall working environment. These incidents were closely related to the threats and intimidation described in the following section, Indicator 6: Threats and intimidation.

(6) Threats and intimidation

Verbal pressure and threats regarding contractual conditions were reported in multiple cases. Crew Member D, in circumstances where wages were not being paid, was pressured with the statement: "If you continue to work, I will give you NT\$2,000." Crew Member E testified that, in addition to being reprimanded by the captain, he also lived under the constant fear of dismissal, as he had witnessed a colleague in the past being forced to return home after being deemed incompetent.

These cases represent classic forms of psychological coercion as an alternative to physical violence, severely restricting the workers' free will.

(7) Retention of identity documents

All workers testified that their passports were confiscated. Passports are not only essential for ensuring freedom of movement but also serve as critical means for accessing legal protection and external institutions. Depriving workers of their passports was not only directly linked to restricting their mobility but also represented a grave form of control that stripped them of their rights to appeal externally and undermined their personal security.

Additionally, Crew Member C testified that, in addition to his passport being held by the captain, he was required to submit identity documents—including his family registration certificate, graduation certificate, and national ID card—to an Indonesian manning agency at the time of departure, to be kept until his return. Among the retained documents, the passport, seaman's book, and BST certificate were to be returned to the seafarer by the manning agency upon leaving Indonesia, after which they would be held by the Taiwanese manning agency upon arrival in Taiwan. However, Crew Member C testified that even now, some of his identity documents remain withheld by the manning agency.

(8) Non-payment and delayed payment of wages

On You Fu, unpaid wages extended up to 15 months, and on Yu Shun No. 668, for more than six months. Crew Member F testified that he had been promised by an agent that six months' wages would be paid immediately, but in reality, no payment was made. Such long-term delays or non-payment of wages directly threaten the workers' livelihood and are highly likely to function as a means of coercion, making it economically difficult for them to leave the vessel.

(9) Debt bondage

Crew Member A understood that wages would be paid monthly, but in reality, he was told that the payment would be made in a lump sum only upon return to port. Moreover, the extended duration of the voyage further postponed receipt. During that time, he had borrowed US\$200 from the vessel owner for living expenses. Such debts forced workers into a situation where they "could not quit even if they wanted to," thereby deepening their economic dependency. Furthermore, another crew member had USD 900 deducted from wages by a recruitment agency for passport renewal, seafarer's book, and living expenses, creating a structure in which continued employment was unavoidable. In addition, cases were identified where workers incurred debt from recruitment agencies for the purchase of supplies.

(10) Abusive working and living conditions

On You Fu, sleeping quarters were infested with insects, and workers had to lay bedding on the floor in a hot and humid cabin. Meals consisted mainly of frozen food and were limited to two per day, leading to nutritional deficiencies. Crew Member D sustained a severe injury while working, cutting his finger down to the bone, but only minimal first aid was provided, and he was forced to continue working with the wound covered in plastic and tape.

On Yu Shun No. 668, food shortages lasted for a month, during which the crew survived only on rice and fish bait. Even before departure, workers had pointed out the lack of provisions to the company and the captain and requested an appropriate amount of supplies, but no measures were taken.

(11) Excessive overtime

On You Fu, working 18–20 hours a day was the norm, with only 4–6 hours of rest. Crew Member C testified, “The contract explained that there would be 8 hours of rest, but in reality, I only got 4 hours.” On Yu Shun No. 668, similarly, long working hours were routine, with 16–18 hours of work per day and only 2–3 hours of rest. While fishing labor by nature involves fluctuating hours depending on weather and catch conditions, such extreme overwork heightens the risk of accidents and health damage, leaving workers in a state of chronic fatigue and subjugation.

Summary

As documented above, both vessels exhibited conditions that correspond to nearly all of the ILO's indicators of forced labor. In particular, multiple elements such as non-payment of wages, confiscation of identity documents, isolation, and excessive overtime overlapped, creating a systematic structure of forced labor that meets internationally recognised thresholds under the ILO framework. On You Fu, long-term non-payment and poor living conditions were especially pronounced, while on Yu Shun No. 668, severe food shortages and contractual clauses requiring security deposits were notable.

What both vessels had in common was the deliberate construction of a "system of exploitation," in which employers and manning agencies combined multiple elements of forced labor to subordinate workers. Furthermore, these vessels are integrated into the supply chain supplying tuna to the Japanese market. In other words, Japanese fisheries-related companies — alongside Taiwan as the flag state, relevant port states, as well as downstream buyers — are inextricably linked to this structure of forced labor. Responsibility for dismantling this system thus lies not only with corporate buyers in Japan, but also with many actors who profit from such supply chains.

Transparency in procurement, audits of employment schemes—including those involving manning agencies—and concrete remedial measures based on human rights due diligence are urgently required. The testimonies presented in this investigation reveal not abstract risks, but the actual reality of workers being exploited. Without immediate and coordinated action, these abuses will remain embedded in the global seafood trade, perpetuating harm and undermining the credibility of responsible sourcing commitments.

Chapter 3

Taiwan's Situation

3.1 Systemic Issues in Taiwan's Distant Water Fishing Industry

3.1.1 Legislative context and international criticism: The need for reform

Taiwan's distant water fishing (DWF) industry has repeatedly come under international scrutiny for widespread forced labor and labor abuses. The U.S. Department of Labor has listed Taiwanese-caught fish in its "List of Goods Produced by Child Labor or Forced Labor" three consecutive times, and as of now, at least two Taiwanese-flagged vessels and two flag of convenience (FOC) vessels owned by Taiwanese investors have been subject to Withhold Release Orders by the U.S. Customs and Border Protection.³⁶ Despite Taiwan's self-image as a democracy committed to human rights, its legislative and regulatory frameworks have consistently failed to protect migrant fishers working on Taiwanese vessels.

At the heart of the issue is a fragmented governance structure and a legal framework that prioritizes trade and fisheries compliance (particularly with the EU and IUU fishing rules) while neglecting core labor protections. Taiwan's 2016 Act for Distant Water Fisheries, passed in response to an EU warning over illegal fishing, focuses heavily on catch documentation and vessel monitoring, but does little to safeguard human rights on board.

While Taiwan has laws that protect other categories of workers, such as the Labor Standards Act and the Employment Service Act, these do not apply to the majority of migrant fishers working on Taiwanese-flagged vessels in international waters.

Instead, distant water fishers are governed by the Act for Distant Water Fisheries and the "Regulations on the Authorization and Management of Overseas Employment of Foreign Crew Members" (2017 Regulations). However, these are fisheries-sector laws and are under the administrative regulations of the Fisheries Agency, not governed as labor laws, which do not guarantee core labor protections such as working hour limits, overtime pay, occupational safety standards, or access to social security.



³⁶ US Department of Labor, "2020 List of Goods Produced by Child Labor or Forced Labor", September, 2020, https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2019/2020_TVPR_A_List_Online_Final.pdf

3.1.2. Fuh Sheng No. 11: A case study in regulatory failure

The 2018 case of the “Vessel from Hell” Fuh Sheng No. 11 illustrates the cost of these legal failures. When the ship docked in Cape Town, South Africa in May 2018, inspectors found extensive violations of the ILO Work in Fishing Convention (C188): crew members reported 22-hour workdays, violence from the captain, filthy conditions, lack of safety equipment, and wage deductions leaving them with as little as \$50 per month.³⁷

The Fisheries Agency was aware of the situation but chose to conceal it. It only acknowledged the violations after the ILO made the case public.³⁸ A subsequent Control Yuan investigation revealed that the crew lacked employment contracts, earned below minimum wage, had insufficient food and water, and received little or no rest. These were not just breaches of ethical norms, but of both international standards and Taiwan’s own administrative regulations. However, because the regulations in question are weak and not grounded in enforceable labor law, the resulting penalties were minimal.

The *Fuh Sheng* case illustrates not just individual abuse, but systemic regulatory failure. Taiwan’s legal architecture offers no effective mechanism to detect or prevent abuse aboard distant water vessels until external actors, such as foreign authorities or international organizations, intervene.

3.1.3. Legislative Gaps

(a) The two-tier employment system

A key issue is that Taiwan operates a discriminatory “two-tier” employment system for migrant fishers. There are two types of fishers working on Taiwanese-flagged vessels: (1) “domestic employment” under the Employment Service Act, mainly working in coastal areas but sometimes in distant waters, who are covered by the Labor Standards Act and overseen by the Ministry of Labor; and (2) “overseas employment,” who work on vessels flying the Republic of China flag and shall arguably be considered as working within Taiwan’s jurisdiction.



³⁷ “1天工作22小時！台灣漁船被控虐待外籍漁工、苛扣薪水 - 生活 - 自由時報電子報,” accessed February 5, 2025, <https://news.itn.com.tw/news/life/breakingnews/2552381>.

林珮君, “台灣福牲11號根本是地獄船！EJF基金會調查，虐待漁工非法捕撈IUU，呼籲台灣積極面對,” 上下游新聞, September 13, 2018, <https://www.newsmarket.com.tw/blog/112785/>

³⁸ “調查報告,” 監察院全球資訊網, accessed February 5, 2025, <http://www.cy.gov.tw/CyBsBoxContent.aspx?n=133&s=6550>

“Overseas employment” fishers hired through brokers abroad are excluded from protections under the Labor Standards Act and instead are governed by the Regulations on the Authorization and Management of Overseas Employment of Foreign Crew Members. This legal loophole leaves distant water fishers, primarily from Indonesia and the Philippines, without access to fair wages, insurance, or legal remedies.

The 2015 death of Indonesian fisher Supriyanto,³⁹ employed through the “overseas employment” channel on the Fu Tsz Chiun (福賜群號) and denied medical care until he died of sepsis, pushed the Fisheries Agency to amend the 2017 Regulations. However, the amended rules merely require submission of employment contracts to the Agency, without any mechanism to verify or enforce compliance with wage, working hour, or welfare standards. Consequently, reports of labor exploitation aboard Taiwanese fishing vessels have continued to surface despite these regulations.

(b) Isolation at sea and the right to communicate

The isolation of distant water fishers is both a symptom and enabler of forced labor. Most vessels lack Wi-Fi, and satellite phones are controlled by captains or Taiwanese officers. As a result, workers cannot report abuse or communicate with their families for months at a time.

Although Taiwan has national complaint hotlines, the 118 and 1955 lines, they are inaccessible at sea. Without legal mandates requiring onboard connectivity, and with no enforcement mechanisms in place, fishers are left without a lifeline during months-long voyages.

Without access to complaint mechanisms, violations remain hidden until vessels dock. This has led to severe mental health consequences and family breakdowns.⁴⁰ According to data from the Fisheries Agency’s Foreign Crew Interactive Service Platform, as of 2024, only 109 vessels, or about 11% of Taiwan’s distant water fleet are listed as having Wi-Fi available for crew members.⁴¹ This proportion remains extremely low, and the Fisheries Agency has no enforcement mechanism to ensure that even these vessels provide reliable communication access to fishers on board.



³⁹ Greenpeace, “Misery at sea: Human suffering in Taiwan’s distant water fishing fleets”, May 24, 2018, <https://www.greenpeace.org/aotearoa/publication/misery-at-sea/>

⁴⁰ Mina Chiang and Sharlene Chen, GJL-ILRF Briefing: WiFi for Fishers at Sea - International Standards, Laws, and Practices, November 2024,

https://cdn.prod.website-files.com/662f5d242a3e7860ebcfde4f/6642832e5b2d825889ab8b9d_WiFi%20for%20Fishermen%20at%20Sea_GLJ-ILRF%20Briefing-ENGLISH.compressed.pdf

⁴¹ TAHR, “Distant Sea Fishermen Need Wi-Fi Now”, February 20, 2023, <https://www.tahr.org.tw/content/3414> ; Fisheries Agency, Ministry of Agriculture, “Fisheries Agency discussed the policy of promoting WiFi on fishing vessels with Indonesia fishers and International Human Rights Organizations”, November 30, 2022, https://en.fa.gov.tw/view.php?theme=Press_Release&id=81

(c) Occupational safety and medical care

Distant water fishers face hazardous working conditions with minimal safety oversight. Life jackets are rarely provided, and medical treatment is often denied, even in life-threatening cases. Workers have reported being forced to continue working with severe injuries, while vessels routinely ignore emergencies such as overboard crew.⁴²

Due to DWF vessels being regulated by the Fisheries Agency, Taiwan's Occupational Safety and Health Act (OSHA) does not apply to work performed at sea. This jurisdictional gap leaves fishers without legal protections for basic workplace safety that other workers enjoy. Employers are only required to provide commercial insurance, which is a lower standard than the protections guaranteed under the Labor Insurance Act and National Health Insurance Act for other workers. Fishers employed through overseas recruitment channels remain ineligible for national health insurance, despite performing dangerous and physically demanding work. Fishing workers are, fundamentally, workers, and should be entitled to the

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“While processing fish, I sustained a deep cut to my finger, down to the bone. However, the captain only gave me minimal first aid. I had no choice but to continue working with the wound covered in black tape and plastic.”

— Former Indonesian crew member D, You Fu

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same occupational safety protections under OSHA as those in any other sector. Fatalities and serious injuries aboard vessels are often ignored or inadequately addressed. Cases such as the blindness of fisher Adrei Nelwan, injured by a snapped fishing line but forced to keep working without treatment,

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⁴² The Guardian, “A fishing accident blinded me but I was forced to keep working”: abuses faced by workers who catch our fish”, March 13, 2024, <https://www.theguardian.com/business/2024/mar/13/fishing-industry-worker-abuse>

The final medical report for Supriyanto, who was abused and ultimately died aboard the Fu Tzu Chun, stated that he died of sepsis. When he first began feeling ill, the vessel continued operations without any effort from the captain or crew officers to seek medical treatment for him. On the same vessel, another crew member fell overboard before Supriyanto's death, yet the ship kept sailing without attempting a rescue.

⁴³ A March 2024 report by The Guardian highlighted the cases of Adrei Nelwan and Susanto, both of whom had worked on Taiwanese distant water fishing vessels for years. During their time at sea, both suffered severe eye injuries from fishing lines snapping against them, leading to blindness.

Michael Sainato, “A Fishing Accident Blinded Me but I Was Forced to Keep Working”: Abuses Faced by Workers Who Catch Our Fish,” The Guardian, March 13, 2024, sec. Business, <https://www.theguardian.com/business/2024/mar/13/fishing-industry-worker-abuse>.

highlight the consequences of Taiwan's failure to apply occupational safety laws at sea.⁴³ These incidents would constitute gross violations under the OSHA or the Act for the Protection of Workers in Occupational Accidents, but neither law applied in these cases.

Though the Fisheries Agency introduced a subsidy program to distribute life jackets and improved port-based facilities, these are piecemeal efforts that do not address the legislative vacuum. In 2021, only 3,122 inflatable life jackets were distributed – a fraction of what is needed for a fleet employing over 28,000 migrant fishers.⁴⁴

(d) Wage protections and enforcement failures

One of the 11 forced labor indicators, “withholding of wages,” is increasingly common among fishers who have filed complaints. The aforementioned cases of You Fu and Yu Shun No. 668 vessels that we interview, along with Shin Lan Fa No. 168 (新聯發168號)⁴⁵ and Sheng Qing Fa No. 96 (昇慶發96號)⁴⁶, are among recent high-profile incidents involving unpaid wages. In several of these cases, withholding of wages was linked to economic hardships faced by vessel owners, some of whom have declared bankruptcy.⁴⁷

Employers have routinely delayed or denied salaries, sometimes for up to 15 months. Even when fines are imposed or criminal referrals are made, fishers often never recover their wages.

Overseas-employed fishers are not protected by the Labor Standards Act's provisions on wage payment, prohibition of unlawful deductions, or severance pay. This has encouraged cases of wage withholding and delayed payment.

While the Act for Distant Water Fisheries provides for employer fines and license revocation in serious cases, these measures are inconsistently applied. There is no dedicated enforcement agency with jurisdiction to conduct wage audits or initiate labor prosecutions for overseas-employed fishers. To our knowledge, the fishers from You Fu — with the support of lawyers, academic groups, and NGOs in



⁴⁴ See Meng-Ying Hsieh, “1個月失蹤15漁民！為工作效率「禁穿救生衣」、外籍漁工溺斃頻傳 民團赴勞動部陳情-風傳媒,” accessed February 18, 2025, <https://www.storm.mg/article/1648166>.

⁴⁵ The Control Yuan, 我國籍遠洋漁船新聯發168號因欠債破產，積欠漁工薪資，並滯留3名印尼籍船員於模里西斯路易士港，長達二年，農業部漁業署囿於人力有限，未能周全保障漁民權益，監察委員紀惠容促請該署改善，以維漁工勞動權益, May 8, 2025, https://www.cy.gov.tw/News_Content.aspx?n=794&s=33013

⁴⁶ Greenpeace International, “US tuna cans linked to reports of forced labor of Indonesian fishers: Greenpeace Southeast Asia report”, December 9, 2024, <https://www.greenpeace.org/international/press-release/71744/us-tuna-cans-linked-to-reports-of-forced-labor-of-indonesian-fishers-greenpeace-southeast-asia-report/>

⁴⁷ “Profiling Taiwanese Distant Water Vessel Owners: A Missing Link for a More Ethical Fishing Supply Chain” (Humanity Research Consultancy), accessed February 18, 2025, <https://humanity-consultancy.com/publications/profiling-taiwanese-distant-water-vessel-owners-a-missing-link-for-a-more-ethical-fishing-supply-chain>.

Taiwan and the UK — are currently pursuing a civil lawsuit against the vessel owner to secure payment of at least the minimum wage stipulated under Taiwanese law.⁴⁸

The Fisheries Agency issued a non-binding “Guidance on Wage Payment to Foreign Crew Members Employed Overseas” in 2020, which recommends, but does not mandate, minimum wage standards. This guidance is not enforceable, and fishers have little recourse if actual wages fall below those benchmarks. As of 2023, the monthly wage standard for these fishers remained at USD 550, significantly below the minimum wage for land-based or “domestic employment” workers protected under the Labor Standards Act (NT\$26,400, approximately USD 830).

3.1.4. Recent Policy Initiatives

In April 2022, Taiwan launched the Action Plan for Fisheries and Human Rights to address international criticism and domestic advocacy. The plan set out goals to improve wages, recruitment regulation, safety, and grievance mechanisms. However, it does not address the core structural issue: the two-tier employment system and the legal exclusion of many distant water fishers from labor protections under the Labor Standards Act and Employment Service Act.

While some measures have been implemented, such as setting up 17 shore-based rest facilities, establishing a minimum wage committee, and improving documentation systems, the impact has been limited. Wage increases have stagnated, Wi-Fi access remains inadequate, and enforcement mechanisms remain fragmented.

The Fisheries Agency has made efforts to expand its oversight, including by proposing labor inspectors and installing CCTV on vessels. However, without statutory labor enforcement powers or collaboration with the Ministry of Labor, these efforts are unlikely to produce systemic change.

Taiwan continues to rely on a legal architecture that prioritizes industry interests and fisheries compliance over labor rights. Through this structure, the fishing industry has allowed employers and labor brokerage agencies to exploit migrant fishers through regulatory loopholes. In practice, this creates an environment where the abuse of workers’ vulnerability is not only tolerated but systemically enabled. While the Action Plan may demonstrate an awareness of human rights concerns, it lacks decisive reform strategies and fails to address the fundamental governance shortcomings that perpetuate forced labor.

Without meaningful legal reform, such as abolishing the overseas employment model, extending the Labor Standards Act to all fishers regardless of recruitment method, and restoring the Ministry of Labor’s central role in enforcement, Taiwan’s distant water fishing industry will continue to be associated with systemic exploitation. The international community, as well as Taiwan’s own civil society, will remain rightly skeptical of reforms that fail to address the legislative and institutional roots of abuse.

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⁴⁸ TAHR, 「法庭觀察 | 銷富號遠洋漁工給付工資案 (言詞辯論)」, <https://www.facebook.com/photo.php?fbid=1189157493246339&set=pb.100064562984909.-2207520000&type=3>

3.2. Across the Pacific: Taiwan's Distant Water Fishing and the Transshipment to Japan

DWF vessels catch tuna on the high seas and within the Exclusive Economic Zone (EEZs) of other countries. To ensure timely delivery to global markets and processing plants - especially for high-value sashimi - these vessels rely on transshipment, either at sea or in port, facilitated by carrier vessels. Such carrier vessels help improve the productivity of catching vessels by transshipping catch to ports at an earlier date, which in turn reduces spoilage of catch, enhances operational efficiency, and improves fisheries management.

If a Taiwanese catching vessel intends to transship its catch at sea, its operator must submit a transshipment plan and relevant information at least 15 days prior to the transshipment.⁴⁹ All such transshipments, whether at sea or in ports, must file "Transshipment Notifications" to the Taiwanese Fisheries Agency and apply for their approval.⁵⁰ In addition, carrier vessels eligible for transshipment are limited to: Taiwanese vessels authorized by the Agency, foreign vessels approved by Regional Fisheries Management Organisations (RFMOs), and the so-called "part-time" vessels that also serve as catching vessels.⁵¹

Carrier vessels under RFMO jurisdictions are required to have an observer on board to monitor their fishing activities.⁵² However, many observers have been reported to face threats to life and other forms of intimidation at sea - raising serious concerns about transparency and enforcement.⁵³

Transshipment is prohibited for high-risk DWF vessels designated by the Fisheries Agency, and no purse seiners shall act as carrier vessels part-time.⁵⁴ Once approved by the Fisheries Agency, fishing vessels are authorized to conduct transshipment within 4 to 11 days depending on the location and method.⁵⁵



⁴⁹ "Regulations for Tuna Longline or Purse Seine Fishing Vessels Proceeding to the Pacific Ocean for Fishing Operation," accessed July 18, 2024, <https://law.moj.gov.tw/ENG/LawClass/LawAll.aspx?pcode=M0050060>.

⁵⁰ "Regulations for Tuna Longline or Purse Seine Fishing Vessels Proceeding to the Pacific Ocean for Fishing Operation."

⁵¹ Ibid. ⁵² Ibid.

⁵³ 陳映妤, "4起外籍觀察員之死——台灣遠洋漁船上待還原的真相," 報導者 The Reporter, January 31, 2021, <https://www.twreporter.org/a/unfinished-far-sea-fishing-governance-the-death-of-observers>; 陳映妤, "割鱈、持續洗魚、資訊不透明——台灣新聘觀察員黯然離開的心聲," 報導者 The Reporter, January 31, 2021, <https://www.twreporter.org/a/unfinished-far-sea-fishing-governance-taiwan-observers>.

⁵⁴ "Regulations for Tuna Longline or Purse Seine Fishing Vessels Proceeding to the Pacific Ocean for Fishing Operation," accessed July 18, 2024, <https://law.moj.gov.tw/ENG/LawClass/LawAll.aspx?pcode=M0050060>.

⁵⁵ Ibid.

According to a 2023 Pew research brief, Taiwan-flagged vessels were responsible for approximately 13% of all RFMO-related transshipments at sea.⁵⁶ While the majority of transshipments happened between one Taiwanese vessel and another, Taiwanese vessels also engaged in transshipment with Panama-, Singapore-, and Vanuatu-flagged carriers.⁵⁷ This discovery underscores a regulatory blind spot: although there are certain rules on how Taiwanese vessels should report their transshipments for approval, there is no public data tracing whether the tuna exported has undergone transshipment during its journey through the supply chain.

The tuna supply chain is widely known for its complexity due to its transboundary nature, the diversity of fishing methods, and the fragmented oversight across jurisdictions. Transshipment at sea adds another layer of opacity, making it difficult to trace the origin of catch or to verify labor and environmental standards. Tuna destined for high-value markets like Japan must navigate a web of documentation requirements, cold chain logistics, and compliance with RFMO rules, all while passing through multiple actors who may be geographically and legally disconnected.

This complexity is particularly evident in the transnational networks linking Taiwanese and Japanese companies, which pose persistent challenges to ensuring compliance and accountability.



⁵⁶ "Most Global At-Sea Transshipment Involves a Small Group of Key Carriers," The Pew Charitable Trusts, April 19, 2023, <https://pew.org/3LcyHQL>.

⁵⁷ "Most Global At-Sea Transshipment Involves a Small Group of Key Carriers."

Chapter 4

Japan's Situation

4.1. Current situation of the Japanese Government response and challenges

The Japanese government has promoted the legal infrastructure focusing on the conservation of fishery resources and prevention of the distribution of illegally caught fish as a part of its measures against Illegal, Unreported, Unregulated (IUU). Due to this, a traceability system that targets specific fish species and a framework to prevent the influx of IUU-derived seafood products into the market have been established to some extent.

However, the focus of these measures is primarily on “resource management” and “environmental protection,” meaning that responses to human rights risks such as forced labor and human trafficking, including protection for workers’ rights on the vessels, is absent from the system’s structure.

Internationally, as seen in human rights due diligence regulations, such as EU’s Corporate Sustainability Due Diligence Directive (CSDDD) and import restrictions in the United States, frameworks considering the connection between “IUU measures” and “human rights due diligence (DD)” have been developed. Compared to these international trends, Japan lags significantly behind.

4.1.1. Japan’s related legislation and challenges

(1) 2017: Accession to the Agreement on Port State Measures to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing (PSMA)

The PSMA is an international agreement, and the background to Japan’s accession to the PSMA was to explicitly demonstrate its responsibility as a fishing nation both domestically and internationally. Also, it was a significant step in terms of preventing seafood derived from IUU fishing from entering the Japanese market and establishing a mechanism that restricts foreign fishing vessels engaged in illegal operations, and their fishery products, from entering Japan.

However, the purpose of accession to the PSMA was limited to the resource management perspective that “Illegal fishing could be a threat to Japanese fishery resources,” and the environmental protection perspective, which is the sustainable use of marine ecosystems.⁵⁸ It contains no provisions concerning working conditions or human rights violations on fishing vessels.

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⁵⁸ Ministry of Foreign Affairs of Japan “Agreement on Port State Measures to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing”. https://www.mofa.go.jp/mofaj/ila/st/page23_001946.html (accessed 3 September 2025).

(2) 2020: Act on Ensuring the Proper Domestic Distribution and Importation of Specified Aquatic Animals and Plants (Enacted in 2022)

This legislation attracted attention as it obliges business operators to record and retain legal harvest certificates and information on the distribution process to prevent the circulation of seafood products derived from illegal fishing.

However, while effective to some degree in resource management, it has limitations in that it does not lead to the protection of human rights. Its scope is limited to certain species, such as abalone, sea cucumbers and glass eels, among others, and it does not include verification of workers' employment conditions or potential human rights violations.

(3) 2024: Amendment to the Act on Ensuring the Proper Domestic Distribution and Importation of Specified Aquatic Animals and Plants (To be enacted in 2026)

The amendment reinforces the management of Pacific Bluefin Tuna resources and also tightens penalties for breaching the legislation. For companies, detailed reporting obligations on catch volumes and record-keeping obligations are imposed based on target fish species, thereby enhancing the effectiveness of management.

However, in this legislative amendment again, the provisions about verification of human rights risks and workers' employment conditions are not included. The scope of this system remains limited to "fishery resource management," excluding the protection of workers on fishing vessels.

(4) Laws and regulations concerning the promotion of resource management based on the Fishery Act

Special measures have been enacted to strengthen the management of tuna resources, which are subject to international discussions on conservation and management measures. The Act on Special Measures for the Enhancement of Conservation and Management of Tuna Resources provides the legal framework for implementing resource management measures adopted by Regional Fisheries Management Organisations (RFMOs) such as the Western and Central Pacific Fisheries Commission (WCPFC), the Commission for the Conservation of Southern Bluefin Tuna (CCSBT), and the Indian Ocean Tuna Commission (IOTC). It enhances resource management through mandatory catch reporting and penalties for violations.

However, the focus is limited to only managing the catch and resource protection through international cooperation. Provisions concerning working conditions on fishing vessels, human rights violations such as forced labor and human trafficking, as well as traceability and management across the entire seafood supply chain are not included. RFMOs themselves also primarily aim to protect resources, leaving labor conditions and human rights risks throughout the supply chain to be addressed by member states' domestic laws and companies' voluntary due diligence.

As revealed in this report's interview with a former crew member of a Taiwanese tuna fishing vessel, the risk of labor exploitation in DWF is high. This highlights the limitations of relying solely on the resource management legislation system when it comes to ensuring the effectiveness of human rights protection and supply chain management.

(5) Work in Fishing Convention (ILO Convention No. 188)

This Convention, as mentioned earlier, sets out specific requirements for achieving decent work on fishing vessels and aims to ensure these standards. If Japan were to ratify this convention, the necessary legal framework would be established to implement its provisions into Japanese law and regulations. Furthermore, towards fishing vessels from non-ratifying countries making a call at Japanese ports, it will be possible to take corrective measures against fishing vessels that are clearly hazardous to the safety or health of workers on the fishing vessel, in accordance with the provisions of the convention.⁵⁹

Ratification would be expected to promote effective legal frameworks addressing human rights risks, including labor conditions, and signal Japan's commitment to human rights to stakeholders across the multi-layered supply chain in the fishing industry. However, as of August 2025, Japan has not ratified the Work in Fishing Convention (ILO Convention No. 188).



⁵⁹ International Labor Organization “C188 – Work in Fishing Convention, 2007 (No. 188)”. https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:12100:0::NO::P12100_ILO_CODE:C188 (accessed 3 September 2025).

International Labor Organization “Decent working conditions Safety and social protection –Work in Fishing Convention, 2007 (No. 188) and Work in Fishing Recommendation, 2007 (No. 199)”. https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@ed_dialogue/@sector/documents/publication/wcms_161213.pdf (accessed 3 September 2025).

4.1.2. Current state of insufficient efforts regarding Human Rights

As mentioned above, Japan's legal framework in the seafood industry is designed to prevent the distribution of IUU-derived seafood. However, the focus of the legal framework is limited to resource management and environmental protection, thus the prevention of human rights violations, such as forced labor on fishing vessels and exploitation of migrant workers, are not directly addressed.

Furthermore, the sole current Japanese policy instrument regarding business and human rights is the "Guidelines on Respecting Human Rights in Responsible Supply Chains" (2022). The underlying issue is the absence of legislation that obliges companies to conduct comprehensive human rights due diligence across their entire supply chain. Without a fundamental legal framework for appropriately identifying and managing human rights risks, corporate action remains voluntary and its effectiveness limited. Moreover, corrective and remedial measures for actual human rights violations that have occurred are also inadequate.

The Fisheries Agency stated in its "Basic Plan for Fishery" (announced in March 2022) that, "Regarding supply chain transparency on human rights issues, which are becoming increasingly important, we will conduct awareness-raising activities to encourage companies to ensure transparency in their supply chains on business and human rights." (translated by the author) However, the effectiveness of "awareness-raising" alone is questionable.

From the perspective of establishing systems based on UNGPs, the Japanese government has the primary responsibility for ensuring that companies protect human rights through steps such as establishing an effective legal framework. The UN Guiding Principles on Business and Human Rights indicate the corporate responsibility to respect human rights in its second pillar. Similarly, international instruments such as the "OECD Guidelines for Multinational Enterprises on Responsible Business Conduct" and the "Tripartite declaration of principles concerning multinational enterprises and social policy", the importance of responsible business conduct is recognized. Given these circumstances, even in the absence of a legally binding framework, companies are expected to act responsibly in line with international human rights standards, including implementing effective human rights due diligence and the provision of remedies.

Furthermore, coordination between the Fisheries Agency, which oversees IUU combating, and the Ministry of Economy, Trade and Industry, which handles business and human rights policy, is inadequate. Consequently, measures addressing human rights violations in Japan's seafood industry, particularly those affecting crew members on fishing vessels, from a "business and human rights" perspective, remain behind international standards such as the EU CSDDD and U.S. import regulations.

4.2. Analysis of the questionnaire for Japanese companies

Purpose and Target Companies of the Survey

Based on the issue of forced labor of migrant workers on Taiwanese tuna fishing vessels highlighted in this report, we conducted a survey from June to July 2025 targeting 19 major Japanese fisheries-related companies to assess the implementation status of human rights due diligence (hereinafter, “HRDD”). The survey focuses on human rights risks in the fisheries industry, particularly within the tuna supply chain, and examines how companies identify and assess these risks and incorporate them into supply chain management and transaction conditions. Additionally, it examines the extent to which grievance mechanisms are established and accessible to workers on fishing vessels, and how companies engage with stakeholders, including migrant workers, to understand and respond to their voices and needs.

The 19 companies surveyed are categorized into five groups: major international fisheries companies with significant influence; major domestic fisheries-related companies; pet food companies supplying tuna-based products (primarily cat food); major operators of conveyor belt sushi chains that support tuna demand in the restaurant industry; and companies that have business relationships with the Taiwanese fishing vessels Yu Shun No. 668 or You Fu, which were highlighted in this report.

The major internationally influential seafood companies include Japanese firms ranked among the top 30 in the Seafood Stewardship Index Total Ranking 2023 by The World Benchmarking Alliance. Mitsubishi Corporation and Marubeni Corporation, along with their respective seafood-handling subsidiaries—TOYO REIZO Co., Ltd. and Marubeni Seafoods Corporation—were included in the scope of the investigation. The specific involvement of each company in their supply chains will be detailed in a separate chapter.

The 19 companies targeted are as follows:

Major seafood companies with international influence

- Nissui Corporation
- Maruha Nichiro Corporation
- Kyokuyo Co., Ltd.
- Yokohama Reito Co., Ltd.
- OUG Holdings Inc.
- TOYO REIZO Co., Ltd. (a subsidiary of Mitsubishi Corporation)
- Marubeni Seafoods Corporation (a subsidiary of Marubeni Corporation)

Major domestic seafood-related companies

- Nichirei Corporation
- ITOCHU Corporation
- TRY Inc.
- Chuo Gyorui Co., Ltd.
- Hagoromo Foods Corporation

Pet food-related companies

- Inaba Foods Co., Ltd.
- Unicharm Corporation

Major restaurant chains specializing in conveyor belt sushi

- FOOD & LIFE COMPANIES LTD.
- Zensho Holdings Co., Ltd.
- Kura Sushi, Inc.

Companies associated with Taiwanese fishing vessels suspected of forced labor

- SINGAZ JAPAN Co. (transacting with Yu Shun No. 668)
- F.C.N. INTERNATIONAL CO., LTD. (hereinafter referred to as FCN, a subsidiary of Taiwanese FCF (Fong Chun Formosa Fishery Company), transacting with You Fu)

As a result of requesting cooperation in the survey from the above 19 companies, FCN, TOYO REIZO, TRY Inc., Marubeni Seafoods, ITOCHU, Maruha Nichiro, and FOOD & LIFE COMPANIES responded. Regarding Zensho Holdings, we received a separate written reply rather than a response to the survey itself. On the other hand, Nichirei, Kyokuyo, and OUG Holdings declined to respond to the survey. Despite multiple requests for responses, no replies were received from Nissui, Chuo Gyorui, Hagoromo Foods, Yokohama Reito, Inaba Foods, Unicharm, Kura Sushi, and SINGAZ JAPAN.

This survey analyzes the responses from the seven companies that provided answers. A detailed summary of the responses obtained from each company is provided in the table in the Appendix 2.

| | FCN | TOYO REIZO | TRY Inc. | Marubeni Seafoods | ITOCHU | Maruha Nichiro | FOOD & LIFE COMPANIES |
|---|--------|------------|----------|-------------------|--------|----------------|-----------------------|
| Awareness of human rights issues | Yellow | Green | Red | Green | Yellow | Yellow | Green |
| Establish a human rights policy | Yellow | Green | Yellow | Green | Green | Green | Green |
| Understanding of the seafood suppliers | Yellow | Yellow | Green | Yellow | Green | Yellow | Yellow |
| Disclosure of the suppliers' lists | Red | Red | Red | Red | Red | Red | Red |
| Survey and monitoring of seafood suppliers | Red | Green | Yellow | Yellow | Red | Red | Yellow |
| Selecting seafood suppliers based on the risk of forced labor | Red | Red | Yellow | Yellow | Red | Yellow | Yellow |
| The process of human rights due diligence | Red | Green | Green | Yellow | Yellow | Yellow | Yellow |
| Assessing the labor rights risks faced by foreign fishing workers in the supply chain | Red | Green | Red | Yellow | Green | Green | Red |
| Accessible grievance mechanisms for workers on fishing vessels | Red | Yellow | Yellow | Yellow | Yellow | Green | Red |
| Stakeholder engagement | Yellow | Green | Green | Yellow | Yellow | Green | Red |
| Participation in networks and platforms | Red | Green | Red | Green | Red | Green | Yellow |
| Collaborate with NGOs and labor unions that support fishing workers to jointly develop policies | Red | Red | Red | Green | Red | Green | Red |

The color-coding criteria for the table above are as follows. Note: A "Green" rating does not indicate that the practice is both necessary and sufficient; further improvement may still be required.

- Green: Items that can be evaluated to a certain degree, but there is still room for improvement.
- Yellow: Insufficient, but some action is being taken.
- Red: Urgent action is required.

(a) Status of HRDD

In the process of implementing human rights due diligence, ensuring transparency and accountability requires full external disclosure of the entire process, including the methods used, the results obtained, and how these results were reflected in corrective measures.

Both TOYO REIZO and ITOCHU identify tuna as a high-priority commodity associated with significant human rights risks. However, the specific results of their assessments and the content of corrective measures have not been sufficiently disclosed. For instance, although some companies state that external audits or on-site visits were conducted, they often fail to specify the countries or regions investigated, the concrete risks identified (such as excessive working hours or contract breaches), and the details of corrective actions taken, such as improvements in employment contracts or retroactive wage payments.

Furthermore, among the surveyed companies, only TOYO REIZO has already introduced a supply chain monitoring system and standards specifically targeting tuna procurement. The company requires its direct suppliers to comply with its Supplier Guidelines through a signed pledge, conducts annual questionnaires to confirm compliance and assess individual risks, and performs both external and internal audits. Based on these results, it reports taking corrective measures. TRY Inc. has also indicated its intention to initiate tuna-specific risk assessments and to share findings with suppliers in order to implement improvements.

Enhancing the effectiveness of HRDD in the fisheries sector requires responses tailored to the characteristics of each product. In the case of tuna, distant-water fishing is predominant, with vessels often remaining at sea for several months, or even up to a year, without calling at port. Moreover, transshipment at sea—where catches are transferred without landing—further obscures the origin of tuna, making supply chain tracing and verification extremely difficult.

Limited port calls also reduce opportunities for crew change, rest, resupply of food, and maintenance of safety equipment, thereby prolonging harsh working conditions. Crew members are also often restricted from contacting the outside world using Wi-Fi or other communication tools. These factors significantly increase the risk of human rights violations, including forced labor and human trafficking.

“

“We were always short-staffed and had to work even during bad weather. There was no additional payment for overtime.”

— Former Indonesian crew member F, You Fu

”

Human rights risks in the tuna supply chain therefore possess distinct characteristics compared with other seafood products. Companies implementing HRDD must conduct risk assessments that reflect the unique fishing operations and labor environments of tuna fisheries, and they must disclose both their findings and subsequent improvements in a clear and transparent manner.

(b) Situation of Migrant Worker Identification

The survey also examined whether companies were aware of the presence of migrant workers aboard vessels within their supply chains. The results showed that TRY Inc., Marubeni Seafoods, and FOOD & LIFE COMPANIES had not yet confirmed such presence, while FCN, TOYO REIZO, and ITOCHU acknowledged that migrant workers were indeed employed. Maruha Nichiro responded that its level of recognition varied depending on the countries and regions in which it operated.

Furthermore, for companies that had confirmed the engagement of migrant workers, the survey further clarified the extent to which they had identified and investigated human rights risks, such as unpaid wages, excessive working hours, and poor living conditions onboard.

As a result, it became apparent that FCN had not yet conducted investigations into such human rights risks. ITOCHU explained that its suppliers operated under the oversight of regional fisheries management organizations (RFMOs), and that the company itself conducted regular assessments, however it did not disclose the specific risks identified.

Meanwhile, TOYO REIZO reported that its survey of tuna suppliers had found no explicit cases of human rights risks at the time of the questionnaire. Maruha Nichiro similarly stated that, in its business dealings in Japan and China, no issues were observed regarding wages, working hours, or living conditions.

(c) Status of Grievance Mechanisms (Remedy Mechanism)

Crew members working aboard fishing vessels often face severely restricted communication environments. In some cases, vessels are not equipped with any means of communication, such as satellite phones or Wi-Fi, making access to information and support far more difficult compared to land-based workers. As a result, even if grievance mechanisms are formally established, their effectiveness cannot be guaranteed unless they are practically accessible. When designing such mechanisms, these unique constraints of the fishing environment must be fully taken into account.

According to the survey results, TOYO REIZO, TRY Inc., Marubeni Seafoods, and ITOCHU indicated that they had established grievance mechanisms accessible via their company websites. Maruha Nichiro reported that grievance mechanisms had been set up in Japan, South Korea, and China, with the Japanese system involving consultations through the local fisheries cooperative association.

However, it remains unclear how these systems are made accessible to workers onboard vessels. Considering that seafarers often cannot freely access the internet, online-only grievance channels are at high risk of becoming dysfunctional. Language barriers also pose a major challenge. On Taiwanese tuna vessels, a large proportion of crew members are migrant workers, particularly from Indonesia. Therefore, it is essential that grievance systems provide support not only in Japanese or English, but also in the workers' native languages such as Bahasa Indonesian. Furthermore, some migrant workers may have limited literacy skills, making it difficult for them to use grievance systems that rely heavily on written information.

In such cases, voice-based options, interpretation services, and other accommodations must be introduced to ensure accessibility for workers with lower levels of formal education.

To date, grievance systems introduced by Japanese seafood companies remain largely formalistic, with significant challenges in ensuring practical effectiveness. The mere “existence” of a mechanism holds little value unless it is designed from the perspective of its actual users, taking into account their communication environment, language needs, and educational levels.

As a next step, grievance systems must be designed specifically for the unique and highly constrained environments onboard fishing vessels. Given the substantial differences in communication capacity and crew access rights across vessels, ensuring the effectiveness of grievance mechanisms requires careful assessment of actual communication conditions and operational practices, followed by the development of layered remedies tailored to those constraints.

(d) Stakeholder Engagement

As described above, a significant gap still exists between the measures implemented by companies and the actual conditions experienced by workers on fishing vessels. Bridging this gap requires a direct understanding of the situation and voices of the rights-holders themselves—the crew members. The challenges faced by fishing vessel workers extend beyond working hours and wages, encompassing practices in employment mediation in their home countries, protections for migrant workers, and detailed living conditions onboard.

Given these complex factors, collaborating with civil society organizations and labor unions that are familiar with the field is essential for companies to supplement their understanding of realities they cannot grasp alone.

In this regard, Marubeni Seafoods and Maruha Nichiro have implemented initiatives in collaboration with external organizations. Marubeni Seafoods participates in roundtables hosted by Seafood Legacy, and in fiscal year 2024, collaborated with the Philippines-based NGO DIWA to visit suppliers, conduct worker interviews, and provide feedback to suppliers based on the findings. This approach advances improvement processes that reflect the perspectives of workers. Similarly, in May 2024, Maruha Nichiro engaged in a dialogue with the ILO and lawyers specializing in issues concerning foreign workers to discuss challenges specific to the fisheries industry. Based on these discussions, the company joined in JP-MIRAI’s corporate collaboration program, promoting the establishment of multilingual consultation services accessible to foreign workers onboard fishing vessels. Additionally, SEAPAC, a group company in Thailand, has already introduced consultation services for workers on certain supplier vessels in collaboration with the NGO ISSARA INSTITUTE.

The starting point for future improvements is to carefully understand the actual conditions of workers through collaboration with civil society organizations and labor unions that are closest to the field. What is required of companies is not merely institutionalization or formal mechanisms, but a deepened understanding of challenges rooted in the real environment and a commitment to respond accordingly.

Correcting business-related human rights violations cannot rely solely on the efforts of government agencies, civil society, experts, or investors. Companies, as key stakeholders with direct knowledge of the realities of the fisheries supply chain and industry structures, must actively participate and collaborate with diverse stakeholders. One effective means of doing so is participation in networks and platforms that facilitate information sharing and the development of common understanding, providing a foundation for addressing issues that are difficult for individual companies to tackle alone. TOYO REIZO, FOOD & LIFE COMPANIES, Marubeni Seafoods, and Maruha Nichiro each engage in exchanges with fisheries cooperatives, participation in roundtables and symposiums, and are involved in international networks and corporate responsibility platforms.

In other words, companies are not merely in a position to listen to external voices; by pooling industry knowledge and practical experience and functioning complementarily with NGOs and international organizations, they can strengthen overall governance capacity. Through multi-stakeholder venues, the sharing expertise and experience is expected to help build a foundation for solving human rights issues across the industry.

4.2.2. Challenges Faced by Companies

Companies shared the difficulties and challenges they face in improving human rights conditions in the fisheries industry and achieving sustainable sourcing of seafood, including tuna. In Japan, under laws based on RFMO conservation and management measures, tuna importers are required to submit documentation proving that the fish were not caught through IUU fishing. However, it was pointed out that this requirement only covers environmental compliance and does not include guarantees regarding human rights violations, which remains an ongoing challenge.

While indirect measures, such as survey-based investigations are possible, companies noted that due to the operational nature of their supply chains, often lacking direct transactional relationships with fishing vessels, onboard monitoring remains significantly limited. Moreover, there was a view that responses from market countries without direct or physical contact with the vessels are constrained, and that flag states or RFMOs should bear greater responsibility for addressing these issues. It was also emphasized that efforts must be made not only by individual companies but across the entire supply chain, demonstrating a willingness to co-create solutions with business partners.

To objectively verify labor conditions on fishing vessels, proper documentation such as records of working hours is essential, and it was highlighted that legal frameworks and regulations need to be strengthened to support such verification. Additionally, the introduction of electronic monitoring was recognized as an effective tool to address structural challenges, indicating the need for its wider implementation and the development of an enabling environment going forward.

Chapter 5

Recommendations

Taiwan:

To the Taiwanese Government

1. Abolish the 'Two-Tiered Employment System'

Eliminate the discriminatory system that excludes overseas-recruited distant-water fishers from core labor protections. Ensure that all fishers working on Taiwanese vessels, including those employed from overseas, are covered under the Labor Standards Act and the Occupational Safety and Health Act, with equal entitlements to fair wages, regulated working hours, occupational safety, and access to remedies.

2. Extend Legal Protections to All Distant-Water Fishers

Amend relevant legislation so that fishers not employed under the Employment Service Act are explicitly brought under the same protections as other migrant workers, closing legal loopholes that enable exploitation.

3. Mandate Onboard Communication Rights

Legislate the requirement for all distant-water fishing vessels to install reliable Wi-Fi communication equipment. Guarantee that all fishers have the right to reasonable, private, and affordable communication with family, trade unions, grievance channels, and support services during operations at sea.

4. Enact Binding Human Rights Due Diligence Legislation

Require all companies operating in or linked to Taiwan's fishing industry to conduct HRDD across their supply chains, with mandatory disclosure of identified risks, mitigation measures, and remediation outcomes.

5. Implement International Labor Standards

Domesticate the ILO Work in Fishing Convention (C188) without delay and fully implement the ten core ILO Conventions, including detailed enforcement mechanisms, penalties for non-compliance, and regular public reporting.

6. Strengthen Enforcement and Monitoring

Increase resources for labor inspections, port state control, and observer programs to ensure compliance with labor and safety standards. Establish independent oversight mechanisms with trade union and civil society participation.

7. Establish an Environment and System that allows workers to organise and voice their opinions without retaliation

Strengthen and safeguard the rights of migrant fishermen to organize and join trade unions, ensuring that they are not subjected to malicious retaliation from employers or agents for speaking out or joining unions. Promote opportunities for fishermen and union representatives to participate in decision-making at various communication meetings, fully implementing the right to freedom of association.

Japan:

To the Japanese Government

1. Mandating Human Rights Due Diligence

Enact legislation requiring all large corporations, including those in the fisheries sector, to implement and publicly report on effective human rights due diligence in line with international standards, including disclosure of their supply chain lists.

2. Import Restrictions on Products Linked to Human Rights Abuses

Establish legal measures to prohibit the import of seafood products identified as linked to human rights violations, and strengthen alignment with international labor standards to improve working conditions.

3. Establishment of a National Human Rights Institution

Create an independent national human rights institution, in accordance with the Paris Principles, to provide access to remedy for victims of human rights violations and to monitor and issue recommendations regarding the implementation of human rights due diligence by both companies and the government.

4. Ratification of the ILO Work in Fishing Convention (No. 188) and Harmonization of Domestic Law

Ratify the ILO Work in Fishing Convention (C188) and revise domestic legislation accordingly to ensure the protection of fishers' rights with respect to safety, health, medical care, living conditions, and wages.

5. Expansion of Catch Documentation Schemes and Ensuring Traceability to Identify Products Linked to Human Rights Abuses

- Amend and expand the scope of the Act on Ensuring the Proper Domestic Distribution of Fishery Products and the Special Measures Act on Strengthening Conservation and Management of Tuna Resources to cover a wider range of seafood species.
- Ensure that catch documentation includes verification that the seafood product in the supply chain is not associated with serious human rights abuses such as forced labor, human trafficking, or child labor.
- Require fishers, importers, and other operators handling seafood imported to Japan to prepare and submit voyage reports, transaction reports, and seafood product reports in order to secure traceability consistent with international standards, thereby preventing human rights abuses in the fisheries sector.

6. Strengthening Monitoring and Enforcement Mechanisms

Conduct investigations to monitor compliance with labor and safety standards for all workers, including migrant workers, on vessels subject to Japanese law (including "maru ships"). Establish an independent monitoring mechanism with the participation of trade unions and civil society organizations to ensure accountability.

7. Guaranteeing Workers' Rights to Organize and Express Their Views

Strengthen and protect the right of all workers in the fisheries sector, including migrant workers, to organize and join trade unions without fear of retaliation from employers or recruitment agencies. Ensure that fishers and trade union representatives are able to participate in decision-making processes, fully realizing freedom of association.

8. Guaranteeing Fishers' Right to Communication

Mandate the installation of Wi-Fi communication systems on distant water fishing vessels and establish legal measures to guarantee all fishers the right to access adequate communication tools, such as Wi-Fi, during voyages.

To the Taiwanese and Japanese Fisheries-related Corporations

1. Effective Identification of Human Rights Risks and Implementation of Remedial Measures

- When investigating, identifying, and prioritizing human rights risks, conduct meaningful engagement with rights-holders and stakeholders, ensuring their input is taken into account. Clearly disclose information regarding the identified human rights risks, as well as the content and plans for remedial measures.
- Publicly disclose the origin of all catches, including vessel names, flag states, recruitment channels, and labor conditions, in line with international traceability standards.

2. Introduction of Human Rights Risk Assessments Specific to Distant-Water Tuna Fisheries

Conduct human rights risk assessments that reflect the specific conditions of distant-water tuna fisheries, prioritizing risks based on the severity, scale, and remediability of human rights violations rather than their business impact. Incorporate the results into procurement policies and contract terms to exert leverage over suppliers, and implement concrete preventive and mitigating measures.

3. Human Rights Risk Assessment and Measures for Migrant Workers

Recognize migrant workers as particularly vulnerable rights-holders with high human rights risks, identify their employment conditions within the supply chain, and investigate the presence, severity, scale, and remediability of human rights risks such as unpaid wages, excessive working hours, and poor working and living conditions.

4. Establishment of Effective Grievance Mechanisms

- Assess the availability and accessibility of communication infrastructure, such as Wi-Fi on fishing vessels, and establish grievance channels that address communication restrictions and language barriers.
- Ensure that migrant workers can access these mechanisms in their native languages, and build multi-layered, practical grievance mechanisms suited to the fishing environment, in accordance with the requirements of the UN Guiding Principles on Business and Human Rights, Principle 31.

5. Implementation of Supplier Assessments through Dialogue

Move beyond reliance on traditional, one-way audit-based approaches by identifying the capacity constraints and structural challenges suppliers face in complying with human rights standards. Adopt an approach that promotes constructive dialogue and the joint development of improvement measures between companies and their suppliers, while also engaging with NGOs and trade unions to address systemic labor risks.

6. Stakeholder Engagement and Collaborative Approaches

- Engage meaningfully with external stakeholders, such as NGOs and trade unions, to enhance the understanding of human rights abuses and strengthen the effectiveness of remedial measures.
- Establish collaborative structures through cross-industry networks and platforms to pursue joint initiatives.
- Create direct communication channels with fishers and their trade unions, including migrant workers, to gather feedback on working conditions and ensure their voices are reflected in corporate policies.

7. Internal Capacity Building

Provide training for company personnel on government corporate due diligence guidelines, with a focus on identifying, preventing, and remediating labor rights abuses in the fishing sector.

Appendix

Appendix 1 Summary of Testimonies of Former Crew Members of Taiwanese Distant-Water Tuna Vessels Based on ILO Forced Labor Indicators

| | Fisherman A (vessel name: You Fu) | Fisherman B (vessel name: You Fu) | Fisherman C (vessel name: You Fu) | Fisherman D (vessel name: You Fu) | Fisherman E (vessel name: You Fu) | Fisherman F (vessel name: You Fu) | Fisherman G (vessel name: You Fu) | Fisherman H (vessel name: Yu Shun No. 668) |
|---|---|--|--|--|--|---|---|--|
| 1. Abuse of vulnerability⁶¹ | High likelihood. | High likelihood. | High likelihood. | High likelihood. | High likelihood. | No explanation of insurance systems (health, pension, labor insurance) | High likelihood. | High likelihood. |
| 2. Deception | Understood wages would be paid monthly, but in reality lump sum paid only upon return to Taiwan. Expected voyage of 3–4 months extended to 9–10 months. | Voyage originally explained as 10 months at contract stage, but extended to 15 months without prior notice. Payslips stated “USD 250 remitted monthly,” but no remittances were made to family; wages paid in lump sum after voyage. | No explicit testimony of contract violation or wage non-payment. Pre-departure explanation limited to wages; no explanation of working hours, food, or living conditions. Initially informed wages would be remitted via bank transfer in Indonesia; actually paid in cash. Contract stipulated 16–18 hours work and 8 hours rest, but in practice: 18–20 hours work, 4 hours rest. Signed three contracts (once with Indonesian agency, twice with Taiwanese agency). Could review terms in Indonesia, but not in Taiwan. Understood that refusing contract in Indonesia could result in penalties or debt remaining. | Wage amount and contract terms were as agreed. | Wages paid in full according to contract, but with significant delays. | Manning agency repeatedly promised by phone that 6 months’ wages would be paid soon, but no payment made. Request for 1 month’s wages also ignored. Left country without sufficient understanding of contract terms (wage schedule, leave, etc.). | No report of false explanations or inconsistencies regarding wages or contract terms. | Contract stated wages paid every 6 months, but delays occurred. Pointed out food shortages but no improvement. |

⁶¹ Because the Taiwanese government lacks adequate protection for the labor rights of distant-water fisheries (DWF) workers, and because their work and residence permits are controlled by their employers, this indicator is considered to apply to almost all DWF workers. Direct testimonies were not captured in this study, but the structural conditions strongly indicate systemic applicability.

| | Fisherman A (vessel name: You Fu) | Fisherman B (vessel name: You Fu) | Fisherman C (vessel name: You Fu) | Fisherman D (vessel name: You Fu) | Fisherman E (vessel name: You Fu) | Fisherman F (vessel name: You Fu) | Fisherman G (vessel name: You Fu) | Fisherman H (vessel name: Yu Shun No. 668) |
|---|--|---|---|---|---|---|---|---|
| 3. Restriction of movement | None. | None. | None. | Shore leave permitted during port calls, but insufficient cash was provided. | No possession of original passport, mobility restricted at ports. | None. | None. | None. |
| 4. Isolation | No Wi-Fi onboard; external communication only during port calls. Learned of father's death during port call when able to contact family. | No Wi-Fi, no external communication; only possible during port calls. | No Wi-Fi; no external communication except during port calls; unable to remit wages or confirm payments to family. | No Wi-Fi, no external communication; only possible during port calls. | No Wi-Fi, no external communication. | No Wi-Fi, no external communication; only possible during port calls. | No Wi-Fi, no external communication. | No Wi-Fi, no external communication. |
| 5. Physical or sexual violence | None. | None. | None. | None. | None. | None. | None. | None. |
| 6. Intimidation and threats | None. | None. | Experienced threats including scolding, early repatriation without pay, denial of meals, being ordered to stand watch during rest time, and confiscation of mobile phone. | No direct threats; however, under unpaid wage conditions, pressure existed such as "continue working and you will receive NT\$2,000." | Reprimands from captain and past cases where colleagues were forced to return home for perceived incompetence, creating constant fear of dismissal. | Frequent reprimands from captain; working hours extended in bad weather, causing mental strain. | None. | None. |
| 7. Retention of identity documents | Passport kept by vessel owner and manning agency. | Passport kept by vessel owner. | Submitted passport, family registry, graduation certificate, and national ID card to Indonesian agency at departure; kept until repatriation. Passport, seaman's book, and BST certificate were returned upon leaving Indonesia but then kept by Taiwanese agency; some identity documents remain withheld. | Passport kept by vessel owner. | Passport kept by captain. | Passport kept by captain. | Passport kept by captain, worker only had a copy. | Passport and seaman's book kept by captain, worker only had passport photo. |

| | Fisherman A (vessel name: You Fu) | Fisherman B (vessel name: You Fu) | Fisherman C (vessel name: You Fu) | Fisherman D (vessel name: You Fu) | Fisherman E (vessel name: You Fu) | Fisherman F (vessel name: You Fu) | Fisherman G (vessel name: You Fu) | Fisherman H (vessel name: Yu Shun No. 668) |
|--|---|--|---|--|---|---|--|--|
| 8. Withholding of wages | Payment will be changed from a monthly salary system via bank transfer to a lump-sum cash payment upon return to Taiwan. Since the return to Taiwan has been postponed, salary payment will be delayed accordingly. | On payslips, USD 250 was shown as remitted monthly to family in Indonesia, but in reality no transfers occurred; entire 15 months' wages paid in lump sum after return. | Wages unpaid for up to 15 months; lump-sum payment after return to Taiwan. During Samoa port call, living expenses treated as wage advance and deducted. Payslips later documented but did not match actual amounts received. | Wages unpaid for 15 months; payment only after intervention by a fishermen's rights protection group. | Eventually full wages paid, but long delays and lump-sum payment after port calls became routine. | 15 months of unpaid wages; full payment only upon return to Taiwan. Only small advance received at Samoa port. | Wages unpaid for 15 months. | Contract required payment every 6 months, but delays became routine. |
| 9. Debt bondage | Had debts to family and friends. Vessel owner lent USD 200 twice as living expenses. | Paid approximately USD 1,150 to Indonesian agency for medical check-up, accommodation, airfare, passport, visa, and seaman's book procedures. | USD 900 deducted by agency for passport renewal, seaman's book, and living expenses. | None. | None. | USD 700 deducted at start as manning fee. | Borrowed NT\$2,000 from manning agency for supplies. | USD 450 administrative fee deducted by manning agency. Contract had a deposit clause, penalty for early resignation. |
| 10. Abusive working and living conditions | Worked 18 hours daily with insufficient rest. Sleeping quarters infested with pests and leaking water; some crew slept outdoors on deck. | Worked 11–15 hours per day; rest approximately 6 hours. Supply vessel delivered food every two months, but provisions often depleted within one month; crew forced to eat fish bait due to shortages. Sleeping quarters cramped, pest-infested; sometimes slept on the floor. Bathing with seawater. | Meals limited to two per day; when insufficient, supplemented with instant noodles or catch from fishing; drinking water limited. Safety equipment and medicine deteriorated or insufficient; captain did not respond to injuries or illness; in emergencies, relied on other vessels. Sleeping quarters hot and humid due to broken fan. | Sleeping quarters infested with pests, hot and humid, making rest difficult; sometimes forced to sleep on deck. Food mainly frozen products and insufficient; drinking water inadequate. Gloves and raincoat provided by vessel owner, but gloves limited in number and reused. No trained medical staff onboard; only painkillers available; injuries treated with minimal first aid. | Meals mainly frozen food, causing nutritional deficiency. When water supply ran out, switched to filtered water of low quality. Dissatisfaction with nutrition and living conditions. No training in first aid. | Sleeping only on mats on the floor in hot, unhygienic cabins. Meals mainly frozen food; water later replaced by filtered water. Protective gear (gloves, raincoats) insufficient and deteriorated. No trained medical staff onboard. Frequent hand injuries, inadequate treatment, forced to self-treat. Crew shortage. Continuous work with no days off; hours further extended in bad weather under dangerous conditions. | Meals only twice per day, lacking vegetables; rice and seasoning also insufficient. Bathing with seawater. Medicines mainly self-procured, no sufficient medical system. | Regular food shortages (for 1 month lived only on rice and fish bait). Shortages already at departure, reported to company and captain but no response. Drinking water only desalinated seawater. Insufficient safety equipment (no helmet, poor rain gear, gloves out of stock). No training or explanation about safety equipment; fishermen had to locate facilities and tools themselves. Only minimal first-aid treatment provided. |

| | Fisherman A (vessel name: You Fu) | Fisherman B (vessel name: You Fu) | Fisherman C (vessel name: You Fu) | Fisherman D (vessel name: You Fu) | Fisherman E (vessel name: You Fu) | Fisherman F (vessel name: You Fu) | Fisherman G (vessel name: You Fu) | Fisherman H (vessel name: Yu Shun No. 668) |
|-------------------------------|--|--|--|--|--|--|--|--|
| 11. Excessive overtime | Rest limited to approximately 6 hours sleep; sometimes pressured to work even during rest hours. Experienced threats including scolding, early repatriation without pay, denial of meals, being ordered to stand watch during rest time, and confiscation of mobile phone. | Daily working hours 11–15. | Actual working hours: 18–20 hours with 4 hours rest; occasional temporary rest during bad weather. | Irregular working hours; actual rest limited to 5–6 hours or less, leading to chronic sleep deprivation. | Working hours ranged from 3 to over 12 hours. Rest irregular, with unloading and cleaning duties even during port calls. | At the port, 1–7 days of shore leave, but with unloading duties, leaving little real rest. | Regular work 12 hours per day. | Regular work 16–18 hours per day. Rest only 2–3 hours. |

Appendix 2 Overview of Questionnaire Responses by Japanese Fisheries-Related Companies

| | FCN | TOYO REIZO | TRY Inc. | Marubeni Seafoods | ITOCHU | Maruha Nichiro | FOOD & LIFE COMPANIES |
|---|--|--|--|---|---|--|---|
| Awareness of human rights issues in the seafood industry | Aware. Recognize the issues about exploitation from fishers by the recruitment agency, and work environment on fishing vessels, such as The Case of the Chinese Vessel LONG XING, etc, which was reported in the HRN report in 2020. | Aware. ①Long operating periods (Tuna longline vessels return to port only once every 1-2 years), ②Since it is located on the offshore, it is difficult to establish external monitoring systems and access remedial mechanisms, ③Discrimination tends to happen due to languages, cultures, and religions because various racial fishers embark on the ship, ④In the recruitment of migrant workers, challenges are recognized, including the difficulty of properly monitoring the process by agents due to the nature of the cross-border process. | Recognize it as a potential risk. | Aware. Recognize that fishing is classified by the International Labor Organization (ILO) as a typical 3D industry (Dirty, Dangerous, Difficult), and distant-water fisheries, particularly tuna fishing, are considered to be at an extremely high risk of IUU fishing and forced labor. These are not only physically isolated far from land but also across multiple jurisdictions on the high seas and within exclusive economic zones, making it extremely difficult to grasp actual conditions, and monitoring is challenging. Also, recognize that due to the large numbers of foreign crew members, employment issues are prone to arise. | Aware. Aware that human rights issues (such as forced labor, working conditions, and wage issues) have been raised. | Aware. Recognize from news coverage that forced labor exists in distant-water fishing, where workers are forced to stay for an extended period on vessels. | Aware. In January 2024, a study session was held for executives about human rights, utilizing the HRN report to understand human rights issues faced by migrant workers on tuna fishing vessels (including forced labor involving long working hours, occupational safety and health challenges, and low wages compared to domestic workers). |
| Establish a human rights policy | Established as a group policy by the parent company | Established | Established as a group policy by the parent company | Established | Established | Established | Established |
| Understanding of the seafood suppliers | Identify only primary suppliers. (As an importer, secondary and subsequent suppliers do not exist.) | Depending on the fish species, it is possible to understand most products back to the fishers and producers. | Understand almost all suppliers of raw tuna. | Understand, but it depends on the type of seafood. | Purchase raw materials directly from fishing companies and understand suppliers from primary suppliers. | Understands up until primary suppliers. | Understands up until secondary suppliers for seafood products. |
| Disclosure of the suppliers' lists | Not disclosed | Not disclosed | Not disclosed | Not disclosed | No response regarding disclosure. | Not disclosed | Not disclosed |
| Survey and monitoring of seafood suppliers | Accompanying visiting shipowners with business partners several times a year. | When procuring goods, promote sustainable sourcing in accordance with "Sustainable Procurement Policy". For tuna products, requiring direct business partners to sign a pledge committing to comply with the "Supplier Guidelines", and conduct annual surveys to assess compliance status and identify individual risks. Conduct external and internal audits of suppliers, | Confirm the addressing status through an interview and on-site visit to the main supplier, and share the results with Investor Relations & Corporate Sustainability Dept. in the parent company, Sojitz Corporation, and each organization at the annual discourse. For tuna procurement, plan to conduct risk assessments with suppliers starting in fiscal year 2025 and | Procure seafood in accordance with the Group Seafood Procurement Policy. In fiscal year 2024, appointed external experts and conducted a preliminary risk assessment using existing information. In fiscal year 2025, planning to conduct a written questionnaire survey of suppliers with external experts, which is available to identify seafood-specific risks, with the aim of verifying traceability | Conduct regular supplier visits and surveys. | Established Group Seafood Procurement Policy in September 2024. However, at this time, common Group survey/monitoring standards for seafood products and tuna have not yet been established. | Specify investigation cooperation in transaction agreements. Conduct monitoring of primary suppliers through an annual sustainability questionnaire. Manage the supplier list. |

| | FCN | TOYO REIZO | TRY Inc. | Marubeni Seafoods | ITOCHU | Maruha Nichiro | FOOD & LIFE COMPANIES |
|--|--|--|---|---|--|---|---|
| | | formulating and implementing improvement plans based on the findings. | on-site due diligence starting in fiscal year 2026, working to share risk information and improvements.. | and human rights/social aspects. | | | |
| Standards of selecting and assessing procurement sources of seafood (especially Tuna)based on forced labor risks | Parent company selects suppliers under the Group's procurement policy, which includes FCF's human rights policy. | Conducts a confirmation of the work. However, specific measures are unclear. | Confirm the OPRT registration list when selecting suppliers. Cease transactions if the Fisheries Agency determines imports are prohibited. Starting in fiscal year 2025, at the risk assessments of tuna suppliers, will check measures against forced labor. | Conduct compliance checks at the start of transactions based on the group's procurement policy. Going forward, plan to confirm human rights conditions in the upstream supply chain through a written questionnaire based on GDST standards | Conduct regular supplier visits and surveys. | Require suppliers of seafood products to be aware of and comply with our Group's Supplier Guidelines, and are advancing initiatives with the goal of obtaining consent and improving key items at all Group suppliers by 2030. | Confirm in the transaction agreement, procurement policy, human rights policy, sustainability questionnaire, and others. |
| The process of human rights due diligence ① Assessing the human rights risks ② Implementing measures to prevent and mitigate identified human rights risks ③ Implementing tracking survey of implementation status and results ④ Disclosure of the whole human rights due diligence | No response | ① Assessing the human rights risks Conduct human rights risk assessments in business activities, especially identifying the tuna supply chain as high risk. ② Implementing measures to prevent and mitigate identified human rights risks Conduct the content of "Survey and monitoring of seafood suppliers" as above, and "Accessible grievance mechanisms for workers on fishing vessels". Participate in a roundtable held by external specialists and exchange opinions with stakeholders about human rights issues affecting workers in the seafood industry, and utilize them to improve companies' sustainable procurement implementation. ③ Implementing tracking survey of implementation status and results Conduct an annual supply chain survey. In fiscal year 2024, surveyed 175 companies, conducted 3 external audits and 30 internal audits, and | (From the Integrated Report) ① Assessing the human rights risks Implementation plan for risk assessment in high risk business areas • Establish implementation plans and schedules • Identification and reconsideration of high risk business areas ② Implementing measures to prevent and mitigate identified human rights risks • Questionnaire, discourse with group companies, and on-site due diligence • Reconsideration of human rights handling and instructions for improvement • Reflection in internal systems ③ Implementing tracking survey of implementation status and results Share the results with Investor Relations & Corporate Sustainability Dept. and each organization, through annual discourse, also conduct an on-site visit. To prepare for critical challenges, set up an investigative | Implement based on Marubeni group's response policy. ① Assessing the human rights risks Identify forced labor and child labor as risks based on various principles and external discourse. Decide priority survey subject such as industry areas・products・region, stages in the supply chain at each year. ② Implementing measures to prevent and mitigate identified human rights risks Conduct desktop research and on-site survey. For seafood products, set up survey items based on human rights and labor issues specific to each country, region, and fish species, with advice from external experts. ③ Implementing tracking survey of implementation status and results Remedial implementation and improvement requests based on survey findings, effectiveness evaluation, and selection of subjects for the next survey. ④ Disclosure of the whole human rights | ① Assessing the human rights risks Conducted a comprehensive human rights risk assessment of the business, and various literature surveys and interviews with sales departments. For seafood products, selected bonito and tuna as priority items requiring focused attention. ② Implementing measures to prevent and mitigate identified human rights risks Based on risk analysis results, conduct questionnaire surveys and supplier engagement with priority target businesses and suppliers in target countries (including indirect business partners). ③ Implementing tracking survey of implementation status and results Identifying human rights issues, discussing future response policies, requesting remedy, and conducting progress follow-ups. ④ Disclosure of the whole human rights due diligence Disclosed on the website starting in | ① Assessing the human rights risks In fiscal year 2023, conducted a whole group risk assessment and identified seven priority human rights issues. ② Implementing measures to prevent and mitigate identified human rights risks As a responding priority issue identified as "forced labor and human trafficking of migrant workers within our group companies in Japan," formulated the "Guidelines for the employment of technical intern trainees and specified skilled foreign workers" and began official operation in fiscal year 2024. Also joined JP-MIRAI and established a multilingual grievance-dealing inquiry window. ③ Implementing tracking survey of implementation status and results Conduct a survey and provide feedback on the status of compliance with the above guidelines. Multilingual grievance-dealing has not been verified as it is in the initial | ※To be implemented in the future. ① Assessing the human rights risks Currently preparing human rights risk assessments and audit items in collaboration with external specialized agencies. ② Implementing measures to prevent and mitigate identified human rights risks Through pilot audits, collaborating with domestic primary suppliers and overseas secondary suppliers to review processes for preventing and mitigating human rights risks. ③ Implementing tracking survey of implementation status and results As indicated in ②, currently establishing the necessary perspectives and processes for the field survey. ④ Disclosure of the whole human rights due diligence No information to disclose at this time. |

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| | | <p>formulated improvement plans as necessary.</p> <p>④ Disclosure of the whole human rights due diligence The progress of initiatives established in the procurement guidelines for tuna species will be published on the website in the future.</p> | <p>framework and update the handle point by incorporating opinions from external experts.</p> <p>④ Disclosure of the whole human rights due diligence Disclosed on the website, integrated report, and annual securities report.</p> | <p>due diligence The survey summary and results of the shrimp will be disclosed on the parent company's website in the future.</p> | <p>fiscal year 2020 for each business area.</p> | <p>implementation phase.</p> <p>④ Disclosure of the whole human rights due diligence Progress is disclosed on the website.</p> | |
| <p>Existence of engagement of migrant workers (fishers on fishing vessels) in the supply chain and related human rights risks assessment</p> | <p>Existence of migrant workers on fishing vessels within the supply chain: Yes</p> <p>Human rights risks assessment for migrant workers: Not Conducted</p> | <p>Existence of migrant workers on fishing vessels within the supply chain: Yes</p> <p>Human rights risks assessment for migrant workers: Conducted surveys of suppliers of tuna species and shrimp. No cases involving human rights risks or other issues have become apparent at this time.</p> | <p>Existence of migrant workers on fishing vessels within the supply chain: Unconfirmed</p> <p>Human rights risks assessment for migrant worker: —</p> | <p>Existence of migrant workers on fishing vessels within the supply chain: Unconfirmed</p> <p>Human rights risks assessment for migrant worker: Plan to conduct a written questionnaire of suppliers starting in fiscal year 2025.</p> | <p>Existence of migrant workers on fishing vessels within the supply chain: Yes</p> <p>Human rights risks assessment for migrant worker: Suppliers operate fishing vessels under RFMO management, with observers monitoring labor issues on all vessels. The company also conducts regular surveys of its suppliers.</p> | <p>Existence of migrant workers on fishing vessels within the supply chain: There are cases where Yes, No or Unconfirmed.</p> <p>Human rights risks assessment for migrant worker:</p> <p>Japan:</p> <ul style="list-style-type: none"> • Treatment equivalent to that of Japanese workers on vessels (wages, working hours, living conditions). • Ensure appropriate wages, benefits, and working conditions for specific skilled foreign workers. <p>Micronesia:</p> <ul style="list-style-type: none"> • Wages are paid to the individual through the manning company. • If the manning company engages in unfair treatment, complaints from crew members themselves are communicated to the All Japan Seamen's Union and company employees. • No complaints regarding unfair treatment have been confirmed, and the working environment is equivalent to that of Japanese workers. <p>Chaina:</p> <ul style="list-style-type: none"> • Monitor and manage labor conditions through regular interviews and other means. • Confirmed that there are no issues | <p>Existence of migrant workers on fishing vessels within the supply chain: Unconfirmed</p> <p>Human rights risks assessment for migrant worker: —</p> |

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| | | | | | | with unpaid wages, long working hours, or living conditions. | |
| Accessible grievance mechanisms for workers on fishing vessels | Not established | The grievance mechanism link is posted on the company's website. Posters have been created, and now considering displaying them on business partner fishing vessels. | The parent company's website provides an inquiry window in Japanese and English, and the company's own website provides an inquiry window in Japanese. | Set up an inquiry window on the company's website accessible to supply chain partners and employees. To date, no inquiries have been received from workers on fishing vessels. | Set up an inquiry window on the company's website. | There are cases where established, not established, or unknown. Japan: Confirm establishment status through an annual survey of suppliers. The fisheries cooperative's councilor handles consultations from workers; last year's number of consultations was zero. Korea: A grievance mechanism accessible to workers on vessels has been established and announced. The number and content of consultations are unknown. China: A grievance mechanism accessible to workers on vessels has been established and announced. Number of consultations is zero. | Not established |
| Stakeholder engagement | Stakeholder engagement: Conducted (1) Dialogue with FCF (parent company/supplier) and TOYO REIZO (buyer) regarding information sharing on FIP and future collaboration. (2) Monitoring survey and crew interviews on working conditions aboard tuna fishing vessels, in collaboration with Toyorei and FCF. | Stakeholder engagement: Conducted (1) Regular exchanges of views and meetings with external experts on human rights, labor, and IUU, as well as participation in roundtables organized by them. (2) Exchange of views with overseas fisheries associations on working conditions in purse seine vessels, and confirmation of the associations' roles. (3) Exchange of views with domestic fisheries cooperatives on working conditions in distant-water longline vessels, and | Stakeholder engagement: Conducted (1) Engagement with Human Rights Now and APIL (Advocates for Public Interest Law, a South Korean NGO) on human rights risks in the tuna supply chain. | Stakeholder engagement: Conducted (1) Engagement with FAIRR on seafood traceability. | Stakeholder engagement: Conducted (1) Engagement with suppliers selected based on internal criteria such as labor management, including on-site visits and dialogue with management, with outcomes reflected in corporate management. | Stakeholder engagement: Conducted (1) Hearings with foreign workers employed directly by the group (two group companies and two directly managed plants employing Technical Intern Trainees and Specified Skilled Workers) on their employment within the group and their lives in Japan. A guideline on the employment of Technical Intern Trainees and Specified Skilled Workers was established in FY2023 and has been fully implemented since FY2024. | Stakeholder engagement: Not Conducted |

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| | | confirmation of the cooperatives' roles. (4) Exchange of views with domestic fisheries organizations on labor and human rights issues related to longline vessels. (5) Exchange of views with overseas fisheries associations on labor and human rights issues related to longline vessels. (6) Engagement with overseas NGOs on outsourced vessel assessments and discussions regarding FIP implementation. | | | | (2) Engagement with the ILO Office for Japan and Gyoh Law Office. (3) Engagement with WWF Japan and the Japan Ethical Association. | |
| | Participation in networks and platforms: No | Participation in networks and platforms: Yes Participated in roundtables organized by external experts and other multi-stakeholder dialogues on labor and human rights issues in the fisheries industry, engaging in opinion exchanges. The outcomes have been utilized to improve the company's initiatives toward sustainable sourcing. | Participation in networks and platforms: No | Participation in networks and platforms: Yes (1) Participation in a roundtable organized by SEAFOOD LEGACY Co., Ltd. (2) Joint supplier visits with DIWA, an NGO based in the Philippines, including worker interviews and providing feedback on identified issues to the supplier. | Participation in networks and platforms: No | Participation in networks and platforms: Yes (1) Participation in SeaBOS: Collaborating within the industry to address key challenges in the fisheries sector, including forced labor and child labor. Shared information with relevant internal departments and promoted initiatives through related business activities. (2) Participation in JP-MIRAI: Although not limited to the fisheries sector, promoting initiatives to protect the human rights of foreign workers in Japan, including facilitating the establishment of the company's multilingual consultation desk. (3) Participation in the UN Global Compact Network Japan: Leveraged learnings from human rights-related working groups for internal human rights training and to advance human rights due diligence. | Participation in networks and platforms: Yes |

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| Initiatives to prevent and eliminate forced labor in the seafood industry in collaboration with organizations supporting workers on fishing vessels, such as NGOs and trade unions | No response | In the process | Not Conducted | Conducted Participation in the roundtable conducted by Seafood Legacy Co., Ltd.. In fiscal year 2024, collaborated with the Philippines-based NGO "DIWA" and visited suppliers, conducted workers interviews, and provided feedback on the identified issues to the suppliers. | Not Conducted | Conducted In May 2024, following a dialogue with the ILO and lawyers specializing in foreign worker issues, particularly challenges in the fisheries industry, joined the JP-MIRAI Corporate Collaboration Program. Plan to promote the establishment of multilingual grievance-dealing inquiry windows that are easily accessible to foreign workers on fishing vessels. At SEAPAC, our Thai group established an inquiry window that is accessible to workers on fishing vessels of specific suppliers in collaboration with the NGO ISSARA INSTITUTION. | Not Conducted |

Silenced Voices behind Tuna

Unveiling Human Rights risks Abuses in Taiwan's distant
water Deep Ocean Tuna Supply Chain to Japan



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