



# SEA-ZE THE DAY



HOW INVESTORS CAN REDUCE EXPOSURE  
TO HUMAN RIGHTS ABUSES IN SEAFOOD



# SUMMARY

Across major US supermarkets, human rights abuses in seafood supply chains are widespread. Part of the reason for this is pressure from supermarkets to drive down costs which can create incentives to engage in poor business practices. In this paper, written for investors that have exposure to US supermarkets, the Interfaith Center on Corporate Responsibility (ICCR) details some of the risks investors face because of human rights violations. The paper outlines the state of play among the largest US supermarkets in combatting human rights risks in seafood supply chains. It also provides recommendations for investor action on mitigating these risks in their seafood supply chains.

This report was developed with input from Oxfam.

The companies highlighted in this report were chosen based on their publicly available information, as well as on investor outreach to those companies and our evaluation of their responses.

**Reproduction Note/Copyright:** ©2025 by ICCR. All rights reserved. Material in this report (including text and any charts/illustrations) may not be copied or duplicated in whole or part by any means without express prior agreement in writing. Some photographs or documents contained in this publication may be the copyrighted property of others; acknowledgment of those copyrights is herein given. All such material is used with the permission of the owner. Readers shall not use, redistribute or transfer content contained in the publication for any commercial purpose, including but not limited to the republication or sale of information, services, or resources contained therein.

SEPTEMBER 2025

Designed by Molly Conley

**Photo credits:** Cover: ILO Pacific Asia/Flickr; p. 2: Ahmed Fareed/Unsplash.com; p. 3 Ahmed Fareed/Unsplash.com; p. 4 ILO Pacific Asia/Flickr; p. 9: pixcolo/iStockphoto.com; p. 10 ILO Pacific Asia/Flickr.

Interfaith Center on Corporate Responsibility  
475 Riverside Drive, Suite 1842  
New York, NY 10027

Visit us online at [www.iccr.org](http://www.iccr.org)

**About the Interfaith Center on Corporate Responsibility (ICCR):** ICCR is a broad coalition of more than 300 institutional investors collectively representing over \$4 trillion in invested capital. ICCR members, a cross-section of faith-based investors, asset managers, pension funds, foundations, and other long-term institutional investors, have over 50 years of experience engaging with companies on environmental, social, and governance (“ESG”) issues that are critical to long-term value creation.

ICCR members engage hundreds of corporations annually to foster greater corporate accountability. Visit our website [www.iccr.org](http://www.iccr.org).



# CONTENTS

- 4** Introduction
- 5** Risks to Investors
- 6** Role of Supermarkets
- 7** Emerging Best Practices in the Food and Beverage Sector
- 8** Where are Supermarkets Performing Well?
- 8** Where Do We See Room for Improvement?
- 10** Questions Investors Can Ask Companies to Assess Their Risk Mitigation
- 11** Endnotes



# INTRODUCTION



Seafood is a major global industry and one of the most-traded food commodities. In 2022 alone, an estimated USD \$472 billion was traded in fisheries and aquaculture production.<sup>1</sup> With over 7% of the global population — or roughly 600 million people's livelihoods connected to seafood,<sup>2</sup> the potential human impacts of the industry are significant.

Human rights abuses related to seafood are widespread across the supply chains of major US supermarkets (or food retailers). While there have been some improvements following exposés of large-scale abuses in the Thai fishing industry over the past decade, recent investigations identifying rights abuses in multiple geographies illustrate that violations remain endemic.<sup>3</sup>

**The exploitation of workers in seafood is at least in part a result of upstream pressures to drive down costs.** This is compounded by national legal frameworks and practices that reflect discrimination, corruption, and deeply entrenched power imbalances — between workers and their employers, and between suppliers and their buyers. Isolation, dangerous and precarious working conditions, long working hours, and/or exploitative labor recruitment make seafood workers highly vulnerable to forced labor, wage theft, and a host of other egregious labor practices.

**Investors can play a key role in holding actors upstream in the seafood supply chain to account, in particular supermarkets.** In this paper, ICCR aims to equip investors with the tools and insights to do so by:

- Examining key risks for investors;
- Considering the role US supermarkets play in stemming these risks; and
- Proposing specific actions investors can initiate.



In seafood supply chains, human rights abuses can generate significant risk for companies.

## **Companies in the seafood supply chain face increasing legislative and legal risk.**

- In recent years, lawsuits and formal legal inquiries have been launched against supermarkets and brands for facilitating abuses in their seafood supply chains,<sup>4</sup> as well as for engaging in consumer fraud around responsible seafood sourcing practices.<sup>5</sup>
- Companies could also run afoul of other US laws and regulatory requirements, including those related to use of forced labor (e.g., Smoot-Hawley Tariff Act of 1930, Section 301 of the Trade Act of 1974, the Customs Trade Partnership Against Terrorism, or the Uyghur Forced Labor Prevention Act (UFLPA). While multiple Withhold and Release Orders have been filed in the past,<sup>6</sup> scrutiny on seafood imports could increase as the current Administration tries to boost the US seafood industry and increase crackdown on Illegal, Unreported, and Unregulated (IUU) Fishing.<sup>7</sup>

## **Heightened US-China tensions could result in increased US government scrutiny of seafood supply chains.**

- The growing global presence of Chinese-operated fishing vessels has attracted significant attention from the current US Administration,<sup>8</sup> members of Congress,<sup>9</sup> and US government agencies.<sup>10</sup> Seafood has been added to the list of high-risk sectors for enforcement under the UFLPA,<sup>11</sup> resulting in increased scrutiny of seafood imports from China in reach and scope.
- Additionally, the US Coast Guard has conducted operations against and boarded Chinese vessels off the coast of South America in response to illegal overfishing.<sup>12</sup> Interventions like these signal potentially increased US government action against human rights violations arising from Chinese-owned seafood businesses.<sup>13</sup>
- In addition to its growing role in the seafood supply chain, China is also expected to account for 40% of global seafood consumption growth by 2030.<sup>14</sup> As the US tries to boost US competitiveness, it is more likely to increase oversight of imported seafood, especially that coming from China.<sup>15</sup>

## **Increased media scrutiny of human rights abuses can lead to reputational damage.**

- Investigations into pervasive human rights violations on seafood vessels have been high profile, with supermarkets called out in leading national media outlets.<sup>16</sup> Reputation can significantly impact how consumers perceive US food retailers and the products they sell, driving their purchase decisions. In one study, customers indicated a preference to not have seafood connected to human rights abuses sold in US supermarkets.<sup>17</sup>

## **Warming waters can result in increased incidences of illegal labor.**

- As overfishing depletes fish stock and ocean warming contributes to a decline in global fish populations,<sup>18</sup> fishing vessels may start to cut corners or increase their use of less sustainable practices, for example, spending more time in deeper waters, increasing risks of engaging in illegal behavior.<sup>19</sup>





Eighty percent of seafood consumed in the US is imported.<sup>20</sup>

A major market for seafood across the globe, US supermarkets have significant influence due to their size, market share, and links to varieties of seafood. US supermarkets can encourage those upstream in their supply chains to respect human rights standards.

Whether it be squid sourced from China,<sup>21</sup> shrimp from India,<sup>22</sup> or tuna from the Chinese Distant Water fleet,<sup>23</sup> price pressures on supply chains can cascade upstream. A recent investigation of abuses specifically highlights the purchasing policies of supermarkets and how they relate to abuses in the seafood supply chain.<sup>24</sup> The likelihoods of tariffs being placed on seafood imported into the US can also lead to the costs of tariffs being pushed onto suppliers, resulting in the likelihood that labor practices in supply chains such as seafood will be more exploitative than they already are.

## Policies and Practices of US Supermarkets

As part of our focus on food value chains, this analysis will concentrate on the practices of leading US food retailers, based on their revenue, market size, and connection to seafood.<sup>25</sup> This does not imply that other companies are performing better, but rather highlights our prioritization of those we believe are best positioned to influence business practices upstream in the seafood supply chain. Our analysis builds on years of our allies' engagement with US supermarkets on a variety of commodities, including seafood, and advocating for improved policies and practices that would lead to a greater respect for human rights of workers.

In recent years, we have seen some companies take positive steps to address risks associated with their seafood supply chains. Recognizing the limitations of audits in uncovering human rights risks and impacts, more companies are turning to human rights impact assessment (HRIAs). When conducted effectively,<sup>26</sup> HRIAs are a powerful tool for identifying the root causes of human rights impacts through robust data collection and meaningful engagement with rights holders. Furthermore, many companies have adopted human rights policies, stating their commitment to respect human rights and to comply with the United Nations Guiding Principles on Business and Human Rights (UNGPs)

### What are the UNGPs and how do human rights due diligence (HRDD), HRIAs and the environment fit within them?

The United Nations Guiding Principles on Business and Human Rights (UNGPs), unanimously endorsed in 2011, set clear expectations for governments and companies to prevent and address negative human rights impacts linked to business activity.<sup>27</sup> A cornerstone of the UNGPs is the requirement for companies to carry out human rights due diligence (HRDD), a process that includes identifying and assessing actual and potential impacts, integrating and acting on the findings, tracking responses, and communicating how impacts are addressed.<sup>28</sup>

Crucially, the UNGPs also highlight the importance of establishing effective grievance mechanisms, which are essential for accountability: they provide a channel for affected individuals and communities to raise concerns, ensure that companies are made aware of harms, and enable access to remedy when rights have been violated.<sup>29</sup> To fulfill their purpose, such mechanisms must also meet the UNGPs' effectiveness criteria—being legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and based on engagement and dialogue with stakeholders.<sup>30</sup>

While Human Rights Impact Assessments (HRIAs) are not explicitly mentioned in the UNGPs, they are widely recognized as a valuable tool to operationalize HRDD.<sup>31</sup> If conducted effectively, HRIAs can help companies meet their due diligence responsibilities while also empowering rights-holders, fostering meaningful dialogue with stakeholders, and supporting collaborative solutions.<sup>32</sup>

Human Rights Impact Assessments (HRIAs) are grounded in internationally recognized human rights standards and principles.<sup>33</sup> Their purpose is to measure the gap between human rights as defined in international instruments and human rights as experienced in practice by affected rights-holders, such as workers and communities.<sup>34</sup> Unlike environmental and social impact assessments, HRIAs are explicitly rooted in international human rights law, which establishes the minimum standards companies must respect across all civil, political, economic, social, and cultural rights.<sup>35</sup> By examining both actual and potential impacts—negative and positive—HRIAs not only help prevent, mitigate, and remedy harms but can also contribute to improved development and sustainability outcomes.<sup>36</sup>

Further, although the UNGPs do not explicitly mention the environment, they acknowledge that human rights due diligence should cover actual and potential adverse impacts on all human rights, which include those resulting from environmental harms. Moreover, following the recognition of a clean, healthy, and sustainable environment as a human right (hereinafter ‘right to a healthy environment’) by the UN Human Rights Council in 2021 and the UN General Assembly in 2022, human rights due diligence should now address actual and potential adverse impacts on this human right.<sup>37</sup> Thus, human rights due diligence should now cover actual and potential adverse impacts on human rights resulting from environmental harms, including the right to a healthy environment (hereinafter, ‘[potential] adverse human rights impacts resulting from environmental harms’), and can guide businesses as they make their contribution to addressing the triple planetary crisis.<sup>38</sup> Human rights due diligence inclusive of environmental impacts is known as *HREDD* — human rights and environmental due diligence.

In 2024, the UNDP published a practical tool for business that offers advice, experiences, and insights on how to integrate environmental dimensions into their HRDD. The Practical Tool recognizes (1) that in addition to pollution, climate change, and biodiversity loss, adverse impacts on the right to a healthy environment may include impacts on sufficient water and healthy and sustainable food, and (2) that there are other environmental threats, such as desertification, land degradation, drought, and zoonotic diseases, and, therefore is in no way intended to limit businesses’ efforts in integrating environmental dimensions into human rights due diligence beyond the framework of the triple planetary crisis.<sup>39</sup>

## Emerging Best Practices in the Food and Beverage Sector

At a high level, **Nestlé** stands out for disclosing action plans for its ten salient human rights issues, including forced labor in its seafood supply chain in Thailand.<sup>40</sup> These action plans articulate why each issue is a priority, how Nestlé is currently addressing it, what challenges and risks exist, and specific actions the company is planning to take. Nestlé aims to report on progress in 2025.<sup>41</sup>

**Bolton Foods** has a human rights policy<sup>42</sup> and a supplier code of conduct,<sup>43</sup> which include a commitment to creating favorable conditions that enable a living wage for workers in its supply chain. The company is also conducting several HRIAs in its seafood supply chain and ensuring a high level of civil society engagement in its human rights due diligence (HRDD) activities. Bolton Foods has published the first two HRIAs conducted in Ecuador and Morocco on June 24, 2025.

## Where are Supermarkets Performing Well?

No company is fully implementing all components of the Human Rights and Environmental Due Diligence (HREDD) process at the level of best practices. However, several companies are implementing parts of the process, which represents a positive starting point. These efforts include:

- **Ahold Delhaize's publication** of human rights updates in its annual report and a regular human rights report,<sup>44</sup> which includes progress on its HRDD roadmap (and progress on seafood as a high-risk sector). In addition, Ahold Delhaize has a grievance mechanism with a safeguarding policy (which outlines safeguards for persons reporting misconduct)<sup>45</sup> that is accessible for all rights holders<sup>46</sup> which should be promoted more proactively throughout supply chains to be effective.<sup>47</sup>
- **Costco has started** a process to identify the commodity and geography combinations where its salient risks are most likely to occur, to be followed up by developing action plans to address risks. Costco has also committed to conduct a Human Rights and Environmental Impact Assessment (HREIA) in Brazil.<sup>48</sup>
- **Hy-Vee is starting** to disclose information about the fishing vessels it sources seafood from, demonstrating better transparency, though not all national brands are currently included.<sup>49</sup>
- **Kroger's commitments** to conduct a comprehensive gap analysis of its current human rights governance and policies, formulate a timebound and meaningful action plan,<sup>50</sup> and publish three HRIAs in high-risks sectors. At the time of this report's publishing, the company has published two of its HRIAs, including one on the farmed shrimp sector in India, which appeared to be a gender sensitive process.<sup>51</sup> Kroger has yet to conduct a third HRIA as committed.<sup>52</sup>
- **Target's partnership** with Better Buying<sup>53</sup> provides a clearer understanding of how its purchasing practices affect its suppliers and their workers.<sup>54</sup>
- **Walmart:** In addition to embedding prohibitions on forced labor in its Forced Labor Prevention Policy and Standards for Suppliers, Walmart has [identified](#) tuna from Thailand and shrimp from Thailand as two of its 10 most salient human rights areas. Walmart is a Co-Chair of the [Seafood Task Force](#) (STF) and the Walmart Foundation has supported research on electronic vessel monitoring, as well as HRDD studies on forced labor in seafood in [Thailand](#) and [SE Asia](#).
- **Whole Foods Market's publication** of its Seafood Code of Conduct<sup>55</sup> that focuses on specific requirements for people working on fishing vessels, and includes requirements for Wi-Fi on vessels.

## Where Do We See Room for Improvement?

While ICCR celebrates these positive steps, significant progress is still necessary. Many companies have made commitments and identified impacts, but limited progress has been made to address the findings and communicate the results of actions taken. Based on their engagements with the companies, ICCR's members suggest that the following additional actions be taken.

- To provide full transparency on its practices, **Bolton** needs to make the findings of its third HRIA and corresponding action plan public.
- To meet the expectations of the UNGPs, **Costco** needs to publish its overall HREDD process, including action plans to address salient risks and the findings of its Human Rights and Environmental Impact Assessment.
- To be in line with the expectations of the UNGPs, **Kroger** needs to publish its HRIA action plans, as well as the outcomes and lessons learned from the grievance mechanism pilot project the company implemented in response to its farmed shrimp HRIA.<sup>56</sup> Kroger has committed to a third HRIA, but at the time of publishing this report, it has not yet been conducted or published.



- **Walmart** could further its engagement by undertaking comprehensive HREDD, conducting HRIAs, and establishing stronger grievance reporting mechanisms to ensure its seafood supply chain is free of forced labor. In addition, Walmart should require and support wifi on vessels it is sourcing from and also could use its voice on the STF to align with the Seafood Working Group in advocating for the installation of Wi-Fi on fishing vessels, a measure that would enable workers to communicate with labor representatives onshore, helping to safeguard their rights and working conditions.
- Very few supermarkets have made commitments to support free, secure, and fully accessible Wi-Fi on fishing vessels.
- The absence of seafood-specific due diligence or support for wifi from **Amazon Fresh**, despite its parent company already implementing these measures at Whole Foods, highlights an inconsistency within Amazon’s corporate approach to human rights. Aligning Amazon Fresh’s policies with Whole Foods’ recent commitments would demonstrate a more unified and robust corporate approach to ethical seafood sourcing.
- Few companies are making significant efforts to understand the impacts of their procurement on human rights and to bring their human rights commitments into their procurement practices.
- Despite recent high-profile investigations of human rights abuses in the seafood sector, several companies’ grievance mechanisms are still only available to their own workers, rather than all rightsholders. Furthermore, **no company is systematically disclosing the grievances it has received, and the remediation offered for harm caused.**
- **Albertsons** is the poorest performing supermarket of those we surveyed and has not made any commitments to address its human rights impacts. It has not published a human rights policy, outlined an HREDD process, or committed to conduct HRIAs in high-risk sectors.





# RECOMMENDATIONS FOR INVESTORS



As influential actors in the broader value chain, investors have an essential role to play in encouraging supermarkets to mitigate the risks of their seafood sourcing practices and pressing for stronger, more meaningful disclosure on this topic.

With this in mind, shareholders should communicate expectations that supermarkets will:

**Publish a human rights policy** covering the company's own operations and those of its entire supply chain, in compliance with international standards such as the International Bill of Human Rights and the UNGPs.

**Publish a gender-responsive HREDD process or roadmap** covering the company's own operations and those of its entire supply chain, in line with the UNGPs. These processes must capture existence of hidden gender-related abuses (such as sexual harassment and coercion in hiring/retention and exploitation of unpaid care work) and provide regular updates about implementation.<sup>57</sup> The HREDD process should include:

- An assessment of human rights risks and impacts through robust tools such as HRIAs to understand, identify, and address the adverse impacts of business practices on human rights.<sup>58</sup>
- Meaningful engagement with rightsholders through all phases of the HREDD process.<sup>59</sup>
- Publication of an action plan and ongoing communication on how the issues are being addressed.

**Ensure worker voice** in the seafood sector. This would include supermarkets:

- Developing grievance mechanisms that are accessible to all rightsholders,<sup>60</sup> are survivor-centered,<sup>61</sup> and provide a clear path to remediation.<sup>62</sup>
- Taking actions to remove barriers to worker representation across the supermarket's supply chain, such as union busting activities and workers being unable to communicate with union representatives while at sea.<sup>63</sup>
- Supporting free, secure, and fully accessible Wi-Fi for workers on fishing vessels.



With climate change warming our oceans and overfishing emptying our seas, now is a crucial moment for investors to act, incentivizing companies in their portfolios to make the improvements to drive meaningful change in the seafood industry. Doing so will not only mitigate the environmental, social, legal, and reputational risks that companies and their investors face, but can help improve human rights practices and sustainable seafood sourcing efforts across the globe.

## Questions that investors can ask companies to assess risk mitigation:

### Human rights policy

- Do you have a policy that is publicly available?
- Do you make a strong commitment to upholding the UNGPs and to respecting all internationally recognized human rights standards?
- Are you committing to addressing the root causes of human rights issues, through collaboration and using your leverage with stakeholders throughout the value chain? Can you explain how?

### HREDD

- Have you published a HREDD roadmap that addresses the nexus of the most material and salient risks in your seafood supply chains and analyzes the root causes of these issues?
- Does the roadmap include meaningful and robust activities? Are you going beyond audits and including activities such as HRIAs? Have you included meaningful rightsholder engagement at each stage of the HREDD process?

### Worker voice

- Do you have a grievance mechanism that is accessible to any stakeholder/rightsholder, and is that mechanism aligned with the UNGP Effectiveness Criteria? These criteria are that the non-judicial mechanism is legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning and based on engagement and dialogue.
- Do you track and disclose how many grievances are filed and resolved? If yes, where is the information and if not, can you provide that information?
- Do you ensure that all your suppliers have access to your grievance mechanism while encouraging them to establish their own?

# ENDNOTES

- <sup>1</sup> Food and Agriculture Organization of the United Nations (FAO). (2024). *Global fisheries and aquaculture production reaches a new record high*. <https://www.fao.org/newsroom/detail/fao-report-global-fisheries-and-aquaculture-production-reaches-a-new-record-high/en>
- <sup>2</sup> Food and Agriculture Organization of the United Nations (FAO). (2024). *The State of World Fisheries and Aquaculture: Blue Transformation in Action*. <https://www.fao.org/publications/home/fao-flagship-publications/the-state-of-world-fisheries-and-aquaculture/en>
- <sup>3</sup> Lawrence, F. (2014, March 4). Thai seafood industry censured over Burmese migrant's trafficking ordeal. *The Guardian*. <https://www.theguardian.com/global-development/2014/mar/04/thai-seafood-industry-burmese-migrant-trafficking-ordeal>; The European Commission. (2019, January 7). *Commission lifts "yellow card" from Thailand for its actions against illegal fishing* [Press release]. [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_19\\_61](https://ec.europa.eu/commission/presscorner/detail/en/ip_19_61)
- <sup>4</sup> Kelly, A. (2023, August 25). *Human Rights Organizations & U.S. Shrimp Producers File Amicus Brief Supporting Cambodian Victim-Survivors of Forced Labor*. Corporate Accountability Lab. <https://corpaccountabilitylab.org/calblog/2023/8/25/human-rights-organizations-amp-us-shrimp-producers-file-amicus-brief-supporting-cambodian-victim-survivors-of-forced-labor>; Brooks, T. (2025, March 12). *Fishers sue Bumble Bee Foods for years of forced labor*. Greenpeace. <https://www.greenpeace.org/usa/fishers-sue-bumble-bee-foods-for-years-of-forced-labor/>; Brooks, T. (2025, March 12). *Fishers sue Bumble Bee Foods for years of forced labor*. Greenpeace. <https://www.greenpeace.org/usa/fishers-sue-bumble-bee-foods-for-years-of-forced-labor/>
- <sup>5</sup> White, C. (2023, March 8). Bumble Bee, Conagra face USD 5 million class-action sustainability claims lawsuits. *SeafoodSource*. <https://www.seafoodsource.com/news/premium/supply-trade/bumble-bee-conagra-face-usd-5-million-class-action-sustainability-claims-lawsuits>; Blank, C. (2024, January 9). Sustainability-focused false-labeling lawsuits dropped after ALDI agrees to change farmed salmon marketing. *SeafoodSource*. <https://www.seafoodsource.com/news/business-finance/sustainability-focused-false-labeling-lawsuits-dropped-after-aldi-agrees-to-change-farmed-salmon-marketing>
- <sup>6</sup> U.S. Customs and Border Protection. (2025, June 28) CBP issues Withhold Release Order on Zhen Fa 7: <https://www.cbp.gov/newsroom/national-media-release/cbp-issues-withhold-release-order-zhen-fa-7>; U.S. Customs and Border Protection. (2020, December 31). CBP issues Withhold Release Order on Seafood Harvested with Forced Labor on Lien Yi Hsing No. 12: <https://www.cbp.gov/newsroom/national-media-release/cbp-issues-withhold-release-order-seafood-harvested-forced-labor>; U.S. Customs and Border Protection. (2020, August 18). CBP issues detention order on seafood harvested with forced labor: <https://www.cbp.gov/newsroom/national-media-release/cbp-issues-detention-order-seafood-harvested-forced-labor-0>; U.S. Customs and Border Protection. (2021, August 4). CBP issues Withhold Release Order on seafood harvested with forced labor by the Hangton No. 112: <https://www.cbp.gov/newsroom/national-media-release/cbp-issues-withhold-release-order-seafood-harvested-forced-labor-0>; U.S. Customs and Border Protection. (2021, May 28). CBP issues Withhold Release Order on Chinese fishing fleet: <https://www.cbp.gov/newsroom/national-media-release/cbp-issues-withhold-release-order-chinese-fishing-fleet>
- <sup>7</sup> Executive Order 14276. (2025, April 17). Restoring American Seafood Competitiveness. The White House. <https://www.whitehouse.gov/presidential-actions/2025/04/restoring-american-seafood-competitiveness/>
- <sup>8</sup> Ibid.
- <sup>9</sup> Strout, N. (2025, June 18). US Senators lambast IUU fishing and abuse in foreign fleets during hearing. *Seafood Source*. <https://www.seafoodsource.com/news/environment-sustainability/us-senators-lambast-iuu-fishing-and-abuse-in-foreign-fleets-during-hearing>; Office of U.S. Representative Jimmy Panetta. (2024, February 20). *Panetta, Steel Urge Investigation of Forced Labor in Supply Chains* [Press release]. <https://panetta.house.gov/media/press-releases/panetta-steel-urge-investigation-forced-labor-seafood-supply-chains>; Clay Higgins U.S. Congressman for Louisiana's 3rd District (2025, February 11). Higgins asks President Trump to levy tariffs on foreign seafood. [Press release]. <https://clayhiggins.house.gov/2025/02/11/higgins-asks-president-trump-to-levy-tariffs-on-foreign-seafood/>
- <sup>10</sup> U.S. Department of Labor. (n.d.). *List of Goods Produced by Child Labor or Forced Labor*. Retrieved March 25, 2025 from <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods>
- <sup>11</sup> Chase, C. (2024, July 10). US Department of Homeland Security adds seafood to list of priorities in Uyghur Forced Labor Prevention Act. *SeafoodSource*. <https://www.seafoodsource.com/news/supply-trade/us-department-of-homeland-security-adds-seafood-to-list-of-priorities-in-uyghur-forced-labor-prevention-act>
- <sup>12</sup> Dubé, R. (2024, October 26). China's Massive Fishing Fleet Overwhelms Locals in 'David and Goliath' Battle. *The Wall Street Journal*. <https://www.wsj.com/world/asia/chinas-massive-fishing-fleet-overwhelms-locals-in-david-and-goliath-battle-a2b64ea6>
- <sup>13</sup> Deaville, P. (2025, February 11). Rep. Higgins asks President Trump for seafood tariff. *WAFB Channel 9*. <https://www.wafb.com/2025/02/11/rep-higgins-asks-president-trump-seafood-tariff/>
- <sup>14</sup> Sharma, N. (2024, August 28). *China's rising demand for seafood is a major opportunity for exporters*. Rabobank. <https://www.rabobank.com/knowledge/q011439579-chinas-rising-demand-for-seafood-is-a-major-opportunity-for-exporters>
- <sup>15</sup> "The United States Trade Representative shall examine the relevant trade practices of major seafood-producing nations, including with regard to IUU fishing and the use of forced labor in the seafood supply chain, and consider appropriate responses, including pursuing solutions through negotiations or trade enforcement authorities, such as under section 301 of the Trade Act of 1974 (19 U.S.C. 2411)". See Executive Order 14276. (2025, April 17). Restoring American Seafood Competitiveness. The White House. <https://www.whitehouse.gov/presidential-actions/2025/04/restoring-american-seafood-competitiveness/>



- <sup>16</sup> CBS News. (2024, September 30). Shrimp farmers in Asia exploited by U.S. supermarkets for big profits, research finds. <https://www.cbsnews.com/news/shrimp-farmers-slave-labor-target-walmart-costco/>; Vanderford, R. (2023, November 1). Lawmakers Press Costco on China Forced Labor. *The Wall Street Journal*. <https://www.wsj.com/articles/lawmakers-press-costco-on-china-forced-labor-2a12e67d>; Urbina, I. (2023, November 21); Brangham, W. & Aranda, T.C. (2024, April 26). North Koreans forced to process seafood that ends up in U.S., investigation reveals. <https://www.pbs.org/newshour/show/north-koreans-forced-to-process-seafood-that-ends-up-in-u-s-investigation-reveals>; Urbina, I. (2024, April 1). There's something very fishy about the global seafood supply. *Time*. <https://time.com/6962248/global-seafood-supply-chain-problems/>; Rising, D. (2024, September 30). As big supermarkets pursue profits, new research shows growing exploitation of shrimp farmers. *Associated Press*. <https://apnews.com/article/shrimp-workers-exploitation-vietnam-indonesia-india-supermarket-d29e3c24a1a20d3815f5418829a6bbe9>
- <sup>17</sup> Ipsos. (2024). Oceana Multiple Campaign Survey [Data set]. Oceana. <https://usa.oceana.org/wp-content/uploads/sites/4/2024/07/Oceana-Multiple-Campaign-Topline-07.03.2024.pdf>
- <sup>18</sup> Edgar, G. (2024, September 12). Investigation reveals global fisheries are worse off – and many have already collapsed. Global Investigative Journalism Network. <https://gijn.org/stories/investigation-reveals-global-fisheries-already-collapsed/>; Dunne, D. (2019, February 28). Ocean warming has caused 'sustainable' fish stocks to drop by 4% since 1930s. *CarbonBrief*. <https://www.carbonbrief.org/ocean-warming-has-caused-sustainable-fish-stocks-to-drop-by-4-since-1930s/>; Johansen, J.L., Mitchell, M.D., Vaughan, G.O., Ripley, D.M., Shiels, H.A., & Burt, J.A. (2024). Impacts of ocean warming on fish size reductions on the world's hottest coral reefs. *Nature Communications*, 15(5457). <https://www.nature.com/articles/s41467-024-49459-8#:~:text=In%20accordance%20with%20the%20Temperature,%25%20by%20205020%2C21>; Chaikin, S., Riva, F., Marshall, K.E., Lessard, J.-P., & Belmaker, J. (2024). Marine fishes experiencing high-velocity range shifts may not be climate change winners. *Nature Ecology & Evolution*, 8(936-946). <https://doi.org/10.1038/s41559-024-02350-7>
- <sup>19</sup> Tickler, D., Meeuwig, J.J., Bryant, K. David, F., Forrest, J.A.H., Gordon, E., Joudo Larsen, J., Oh, B., Pauly, D., Sumaila, U.R., & Zeller, D. (2018) Modern slavery and the race to fish. *Nature Communications*, 9(4643). <https://doi.org/10.1038/s41467-018-07118-9>
- <sup>20</sup> Whittle, P. (2024, December 13). Some in seafood industry see Trump as fishermen's friend, but tariffs could make for pricier fish. *AP News*. <https://apnews.com/article/trump-seafood-fishing-tariffs-oceans-e34a879b477287dc642d2ab2536e1017>
- <sup>21</sup> *The Outlaw Ocean Project*. (n.d.). The Outlaw Ocean Project. Retrieved March 25, 2025, from <https://www.theoutlawocean.com/>
- <sup>22</sup> Corporate Accountability Lab. (2024). *Hidden Harvest: Human Rights and Environmental Abuses in India's Shrimp Industry*. <https://static1.squarespace.com/static/5810dda3e3df28ce37b58357/t/65fae8e7d0d8d90d2ecea975/1710943181785/Hidden+Harvest+Full+Report.pdf>
- <sup>23</sup> <https://ejfoundation.org/resources/downloads/Tide-of-Injustice-SWIO-report.pdf>
- <sup>24</sup> Sustainability Incubator. (2024). *Human rights for dinner: Supermarket shrimp and the business of exploitation*. [https://www.sustainability-incubator.com/wp-content/uploads/2024/09/Human-Rights-for-Dinner\\_September-30-1.pdf](https://www.sustainability-incubator.com/wp-content/uploads/2024/09/Human-Rights-for-Dinner_September-30-1.pdf)
- <sup>25</sup> Other major food retailers are not included as other priorities have been selected for our engagement with them.
- <sup>26</sup> See Oxfam's HRIA Assessment Framework, which presents key criteria for ensuring that the HRIA captures all relevant adverse risks to human rights. The Framework aims to support companies in understanding how their practices have an impact on adverse risks, and to lead to systemic and sustainable improvements for workers and rights holders. <https://policy-practice.oxfam.org/resources/human-rights-impact-assessment-framework-621501/>
- <sup>27</sup> Brodeur, C., Tamir, I. & Zoen, S. (2019, November 4). Chapter 3: Community-based HRIA: Presenting an alternative view to the company narrative. Handbook on Human Rights Impact Assessment. <https://doi.org/10.4337/9781788970006>
- <sup>28</sup> Ibid.
- <sup>29</sup> UN Office of the Human Rights Commission (2021, January). Designing and implementing effective company-based grievance mechanisms. <https://www.ohchr.org/sites/default/files/Documents/Issues/Business/B-Tech/access-to-remedy-company-based-grievance-mechanisms.pdf>
- <sup>30</sup> UN Office of the Human Rights Commission (2021, January). Designing and implementing effective company-based grievance mechanisms. <https://www.ohchr.org/sites/default/files/Documents/Issues/Business/B-Tech/access-to-remedy-company-based-grievance-mechanisms.pdf>
- <sup>31</sup> Ibid.
- <sup>32</sup> Ibid.
- <sup>33</sup> Ibid.
- <sup>34</sup> Ibid.
- <sup>35</sup> Oxfam. (2015, July 21). Community voice in human rights impact assessments. <https://www.oxfamamerica.org/explore/research-publications/community-voice-in-human-rights-impact-assessments/>, Pg 4-5
- <sup>36</sup> Ibid.
- <sup>37</sup> United Nations Development Programme. (2024, November 6). Practical tool for Business on Human Rights Due Diligence and the Environment. <https://www.undp.org/rolhr/publications/practical-tool-business-human-rights-due-diligence-and-environment-hrdde>, Pg 7
- <sup>38</sup> United Nations Development Programme. (2024, November 6). Practical tool for Business on Human Rights Due Diligence and the Environment. <https://www.undp.org/rolhr/publications/practical-tool-business-human-rights-due-diligence-and-environment-hrdde>, Pg 7
- <sup>39</sup> United Nations Development Programme. (2024, November 6). Practical tool for Business on Human Rights Due Diligence and the Environment. <https://www.undp.org/rolhr/publications/practical-tool-business-human-rights-due-diligence-and-environment-hrdde>, Pg 8
- <sup>40</sup> Nestlé. (2025). *Nestlé Human Rights Salient Issue Action Plans*. <https://www.nestle.com/sites/default/files/2023-02/nestle-salient-issues-action-plans-feb-2023.pdf>

- <sup>41</sup> While we acknowledge that Nestlé has published these action plans, which we view as a positive step toward transparency, this brief does not assess the strength of these plans.
- <sup>42</sup> Bolton Group. (2022). *Human Rights Policy*. [https://www.boltongroup.net/sites/default/files/2024-07/Human-Rights-Policy\\_EN\\_2024%20%281%29.pdf](https://www.boltongroup.net/sites/default/files/2024-07/Human-Rights-Policy_EN_2024%20%281%29.pdf)
- <sup>43</sup> Bolton Group. (2023). *Code of Conduct for Suppliers of Products and Services (Bolton Food & Tri Marine)*. [https://www.boltongroup.net/sites/default/files/2024-10/BF\\_CoC-for-suppliers\\_ENG\\_2024.pdf](https://www.boltongroup.net/sites/default/files/2024-10/BF_CoC-for-suppliers_ENG_2024.pdf)
- <sup>44</sup> Ahold Delhaize. (2024). *Human Rights Report 2024*. <https://www.aholddelhaize.com/media/jegpruu0/ahold-delhaize-human-rights-report-2024.pdf>
- <sup>45</sup> See information on Ahold Delhaize’s safeguarding policy on Page 5 here: <https://www.aholddelhaize.com/media/ga0bwwnv/group-speak-up-policy.pdf>
- <sup>46</sup> Fritzner, C. & Ritchie, N. (2024, August 27). The high cost of cheap tuna: US supermarkets, sustainability, and human rights at sea (3rd edition). Greenpeace. <https://www.greenpeace.org/usa/tuna-scorecard-24/>
- <sup>47</sup> Oxfam. (2022, May 4). Behind the Barcodes 2022 Supermarket Scorecard and Data. <https://policy-practice.oxfam.org/resources/behind-the-barcodes-2022-supermarket-scorecard-and-data-621358/>
- <sup>48</sup> Costco Wholesale. (2024) Sustainability Commitment 2024. <https://www.costco.com/sustainability-introduction.html>
- <sup>49</sup> Hy-Vee. (2024). *Hy-Vee Tuna Vessel Name List: January – October 2023*. [https://f0aa1588d63bbf876d65-3976be7afcf464b522431ef7c594a9c.ssl.cf2.rackcdn.com/2025-01-23\\_Hy-Vee%20Tuna%20Vessel%20Name%20List\\_Public\\_Final%20Draft.pdf](https://f0aa1588d63bbf876d65-3976be7afcf464b522431ef7c594a9c.ssl.cf2.rackcdn.com/2025-01-23_Hy-Vee%20Tuna%20Vessel%20Name%20List_Public_Final%20Draft.pdf)
- <sup>50</sup> Kroger. (2021). *Commitment to Respect Human Rights*. <https://www.thekrogerco.com/wp-content/uploads/2022/02/Kroger-Human-Rights-Progress-Update-Policy-Feb-2022.pdf>
- <sup>51</sup> Kroger. (2023). *Human Rights Impact Assessment: Farmed Shrimp in India*. [https://www.thekrogerco.com/wp-content/uploads/2025/06/EVT\\_Kroger\\_Lidl\\_HRIA-Shrimp-India\\_May-2023-Final-Report.pdf](https://www.thekrogerco.com/wp-content/uploads/2025/06/EVT_Kroger_Lidl_HRIA-Shrimp-India_May-2023-Final-Report.pdf)
- <sup>52</sup> Prapha, A. (2021, May 20). A groundbreaking commitment on human rights from a giant supermarket chain in the US. Oxfam. <https://politicsopoverty.oxfamamerica.org/a-groundbreaking-commitment-on-human-rights-from-the-a-giant-supermarket-chain-in-the-us/>
- <sup>53</sup> Better Buying are a ‘nonprofit organization focused on improving purchasing practices throughout the global supply chain’, however it may be challenging to edit the text as Target have already approved this text and as I think since Target published their relevant report, a separate organisation has bought the key assets of Better Buying. See <https://cascale.org/resources/blogs/with-cascale-better-buying-legacy-lives-on/>
- <sup>54</sup> Target. (n.d.). *Responsible Sourcing and Manufacturing Practices*. Retrieved March 25, 2025 from <https://corporate.target.com/sustainability-governance/responsible-supply-chains/sourcing-manufacturing-practices>
- <sup>55</sup> Whole Foods Market. (2025). *Seafood Code of Conduct*. <https://assets.wholefoodsmarket.com/www/legal/Whole-Foods-Market-Seafood-Code-of-Conduct-2025.pdf>
- <sup>56</sup> Kroger is expected to release its 2025 ESG report this fall which could include an update on this important work.
- <sup>57</sup> Brodeur, C. (2023, June 28). *Human Rights Due Diligence: An overview*. Oxfam America. <https://www.oxfamamerica.org/explore/research-publications/human-rights-due-diligence-an-overview/>
- <sup>58</sup> In recent years, we have seen the rise of alternative approaches to HRIAs, most notably rapid assessments, sector-wide or landscape assessments, and joint HRIAs. Oxfam has developed the criteria needed to ensure that the assessment process is thorough and leads to real, lasting improvements in human rights practices. See *Innovative Pathways: When and how to use alternative approaches to HRIAs* <https://policy-practice.oxfam.org/resources/innovative-pathways-when-and-how-to-use-alternative-approaches-to-human-rights-621669/>
- <sup>59</sup> For more on rights holder engagement, please see *Meaningful Rights Holder Engagement: an introduction* <https://www.oxfamamerica.org/explore/research-publications/meaningful-rights-holder-engagement-an-introduction/>
- <sup>60</sup> While effective grievance mechanisms should exist at the local (operational) level to ensure accessibility and timely resolution, it is equally important for retailers to establish mechanisms at their level. In some cases, affected rights holders may face barriers in accessing local mechanisms or may not receive adequate remedy. Additionally, certain issues may stem from purchasing practices or systemic problems that require resolution higher up the value chain.
- <sup>61</sup> A grievance mechanism that is survivor-centered prioritizes the safety, dignity, and agency of individuals experiencing gender-based violence (GBV), harassment, or discrimination. Unlike conventional mechanisms focused on liability, such mechanisms ensure timely, enforceable outcomes and hold both perpetrators and enablers accountable. They must be independent, non-retaliatory, and accessible to all workers (including informal, subcontracted, and migrant labor). These mechanisms should be co-developed and monitored with workers, WROs, and labor groups to ensure meaningful remedy. They must be context-specific, locally adapted, and clearly communicated to all workers. Reporting channels should be diverse, accessible, and tailored to different worker needs.
- <sup>62</sup> Grievance mechanisms should comply with the UNGP effectiveness criteria, which are that they are accessible, predictable, equitable, transparent, legitimate, rights compatible, based on engagement and dialogue, and a source a continuous learning.
- <sup>63</sup> Unionization rates in the seafood sector are much lower than other sectors due to specific challenges, such as workers being at sea for long periods of time and key sourcing geographies prohibiting independent trade unions.