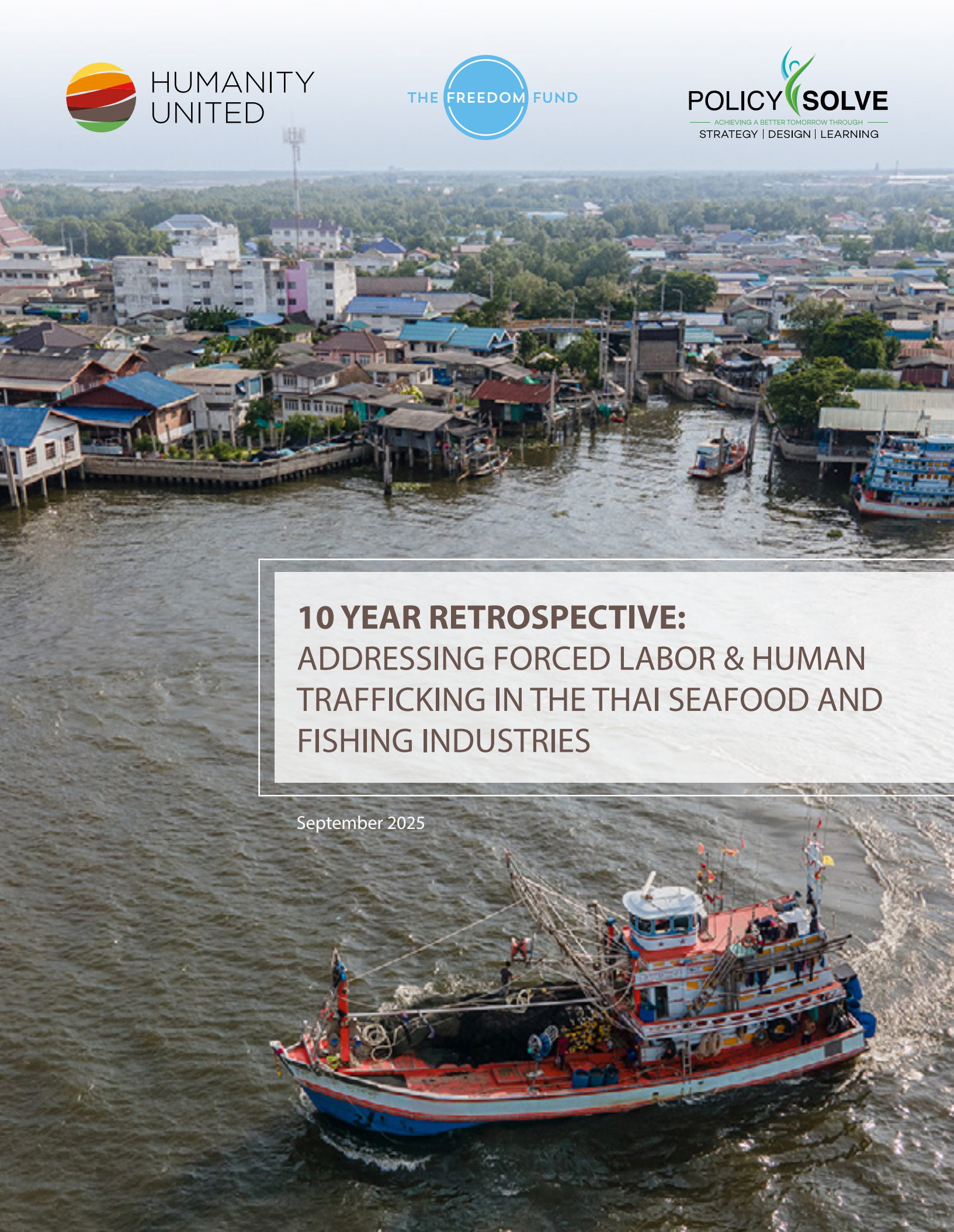




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10 YEAR RETROSPECTIVE: ADDRESSING FORCED LABOR & HUMAN TRAFFICKING IN THE THAI SEAFOOD AND FISHING INDUSTRIES

September 2025

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For further information on the issues raised in this report, please contact Jewlya@policysolve.com

Author Forward

Dear readers,

The lengthy report to follow is a detailed analysis of how change happened in a complex, dynamic global supply chain beginning in Thailand and resulting in products sold around the world. The **report itself is designed to share the perceptions of stakeholders, combined with public and private documents generated throughout the 10 years.** It does not include recommendations, but rather core insights about how, why, and under what conditions change did and did not happen.

As the lead researcher, I was invited to conduct this study based on my 20 years of work on complex systems change, including my roles as a facilitator, implementer (from within government), researcher, and evaluator who uses causal pathways methodologies. I do not have deep expertise in the content of the fishing and seafood industry and its systemic change process, but rather have observed how and why systems change in many different settings, from highly local processes (e.g., restructuring child welfare, education, mental health, and other systems to be client-focused systems of care) to global processes (e.g., changing financial incentives and investment pathways to incentivize climate mitigation and adaptation or building global will and actions to decrease the threat of nuclear weapons).

From this background, I am struck by the uniqueness of this decade-long systems change story in Thailand. Although I cannot claim to have fully captured all the nuances of change (a 500-page report would be needed to tell such a complex story in detail), the causal analysis did surface a set of clear conditions that were necessary to support the changes and processes by which those changes happened. For me, particularly striking elements of how change happened included:

- The **shared understanding of the systemic nature of the problem, its drivers, and the solution set.** Many problems never achieve this shared understanding, even years into efforts to drive change. Yet, documentation and stakeholder stories all point to an unusually common understanding of what this problem is and what drives it, which then leads to a shared understanding of the general set of solutions needed to tackle the problem. Even more amazing, the *common understanding is about a systemic problem* – not just stats explaining the problem exists, but a shared understanding of the systemic drivers of the problem. Despite the many differences across stakeholders, this common understanding created a foundation that allowed dialogues (and ultimately cross-sector collaborations) to be common.
- A **storm of media coverage that told a systemic story, not just a “bad actors” story.** The previous point appears to have emerged in part due to the media storm and how it not only implicated specific corporations (and even individuals), but helped to make visible the supply chain from a fisherman enslaved on a vessel in Thai or international waters all the way to the Western consumer purchasing low-priced seafood, with processing facilities in the middle made visible as well. How often do three different major international media outlets investigate and tell a shocking, compelling, and systemic story about how harms are being caused? In this case, that media storm was clearly foundational for not just visibility, but also for how the problem was collectively understood.
- The **speed and leadership of both the private sector and government action.** Although this story ends with risks of backsliding, and the results are far from a perfect system, a tremendous amount of meaningful change has happened in a very short amount of time. Both the public and private sectors acted with highly visible speed, generating new policies and practices and implementing them within just a few years. Once action starts in a system, it rarely moves with this pace across multiple sectors that are each taking ownership of the changes. There are other examples where public and private changes occur rapidly at the same time, but they are not the norm.
- The **sheer volume of cross-sector collaboration and leadership,** and how it influenced the progression of changes over time. To achieve this level of collaboration, several key elements were necessary: capacity and knowledge, a compelling reason to collaborate, leaders willing to take the lead, and a certain level of trust and bravery. It depended on global and local nonprofit and civil society partners who were positioned to do this work. It required a willingness from both the government and the private sector to give advocates visibility into the complexities of what was happening. It also

needed philanthropic funders willing to support these collaborations. There are other systems where this type of partnership occurs, but the global-to-local nature, combined with the sheer volume of collaborations, is particularly notable.

As I finished this analysis, I found myself thinking about where philanthropy can go from here. One of my key takeaways is that strategically deployed philanthropic funding, when combined with staff close to the work, can significantly impact a systemic change process. That requires being nimble and at the same time establishing long-term partnerships, being honest and blunt while being active listeners who reflect back what they hear, not hesitating to take action even when they might be controversial, and staying around to work through the controversy.

So let me close with this set of ideas for other philanthropic actors seeking to influence complex systems and address the harms they cause:

- **Be part of the systems change in the messiness of it all**, learning and connecting and building and nurturing even the difficult relationships and maintaining them over time.
- Be nimble and open to changing your thinking, but also don't let one stakeholder group be your primary and only source of those evolving thoughts.
- **Make the systemic problem visible and the storyline of what is driving it credible and shared.**
- Find the solution sets that can be widely agreed upon, even if the nuances are widely debated.
- Nurture leaders across sectors, and nurture their replacements to sustain change over time.
- **Fund systems change moments, not just systems change actors**, which requires being able to see them as they begin to happen.
- **Recognize the liminal moments in the larger systems** surrounding your issue area as they occur and lean into those moments, even if the change happening does not on the surface appear to be a helpful one.
- **Find, honor, and build on local capacity**, learn from local partners, and also bring what you're learning into the local work.
- Never stop listening and engaging with actors and processes throughout the systems changes.

Thank you for taking the time to explore this story with me. I hope you also find some nuggets that can inform your practice for influencing how systems change and tackling the inequities and harms they cause.

Jewlya Lynn

Executive Summary

Context and Purpose of the Study

Thailand is one of the world's largest producers and exporters of seafood, supplying major markets in North America, Europe, and Asia. In the early 2010s, investigations by journalists, international NGOs, Thai civil society organizations, and United Nations agencies **revealed widespread human trafficking and forced labor in both the fishing and seafood processing sectors**. Studies documented extreme abuse, including debt bondage, unsafe working conditions, intimidation, violence, people being bought and sold, and even killings at sea. These findings generated global concern and reputational risk for Thailand and the companies purchasing from the country, leading to sustained international scrutiny and demands for reform.

The period from 2014 to 2024 was marked by significant shifts in the political framework of the Thai seafood sector. Under pressure from importing governments, international buyers, and civil society organizations, Thailand introduced legal and regulatory reforms, and the private sector in both Thailand and the global supply chain changed their practices and made public commitments to decreasing forced labor and human trafficking in their supply chains. Civil society organizations in Thailand and international non-governmental organizations leveraged increased philanthropic and government funding to support changes and hold companies and the governments accountable. They also provided workers with assistance in navigating legal processes and mitigating harms, and trained workers on their legal rights while supporting them to advocate individually and collectively for their rights in the workplace. Yet, even as important changes were undertaken and many aspects of the problem improved, the persistence of forced labor highlights the complexity of systemic change in a global supply chain.

Humanity United and Freedom Fund commissioned this report as a retrospective systems-level analysis of 10 years of change in the Thai seafood and fishing industries and the global supply chain that purchases their products. Using causal mapping methodology, it identifies the **conditions that enabled or constrained change, the processes through which reforms advanced or stalled, and the outcomes that emerged across time**. The analysis is based on triangulation of secondary literature, expert interviews, focus groups with workers organizing and leading other migrant workers, and validation workshops with civil society and business experts from inside and outside Thailand.

The purpose of this study is not only to assess the extent of change but to explain how and why change happened, what risks remain, and what lessons can be drawn for sustaining progress. Its findings are intended to inform Thai and international government actors, private sector leaders, philanthropic funders, and civil society organizations engaged in addressing forced labor and promoting durable labor rights in global supply chains.



Photo: © Stride, Josh/Humanity United. Fishing vessels in Thailand. 2016.

Forced Labor and Human Trafficking in the Seafood and Fishing Industries: Change Over Time

Ten years on, **conditions in seafood processing facilities have improved dramatically, while fishing remains persistently higher risk.** The data in Table 1 illustrates these divergent trajectories, showing how reforms reshaped labor practices in processing, decreased extreme violence and forced labor for migrant workers in both seafood and fishing, but also left many of the structural risks in fishing largely intact. Data is not presented at the indicator-by-indicator comparison level as fully comparable, and common indicators were not measured over time.

Table 1. Comparing forced labor and human trafficking from 2014 - 2024

	2014 and earlier ¹	2022 and later ²
Overall	Studies consistently found extreme levels of forced labor (e.g., 80% of surveyed workers never feeling “free”) including deception, isolation, violence, dangerous working conditions, intimidation, long working hours, underpayment, debt bondage, and even murder. Retention of identity documents was common as a way to eliminate the possibility of seeking help or leaving to find a safer, better paying job.	Studies found a shift for all workers, with less violence, more use of contracts, more access to identity documents, and better wages. Workers in and CSO leaders participating in this study describe a system that has improved in not only identifying victims, but also preventing crimes against workers. Yet issues persist, with debt bondage, payment of recruitment fees to secure jobs, restriction of movement between jobs, wage withholding, and deceptive practices continuing.
Seafood Processing Facilities	Workers in small peeling sheds and other processing facilities often worked more than 12 hours a day in inhumane conditions , with their movements closely monitored to ensure they did not attempt to change jobs. Children younger than 15 were often employed in peeling sheds. Few workers had contracts and almost none were paid above minimum wage.	Peeling sheds, as one of the most unregulated and unsafe working environments, have been closed down. The latest research suggests most workers in seafood processing plants are receiving minimum wage or better , with work contracts in place, a decrease in paying recruitment fees to brokers, and only 1% of seafood processing workers now meeting the definition of forced labor in an ILO study.
Fishing Vessels	Some of the worst forms of forced labor and human trafficking occurred on the vessels , with workers forced to use methamphetamines to work through shifts of 20 hours or more, physical violence used for control, lack of food and medical care, as well as beatings and even cases where workers were murdered. Workers were isolated for months or longer at sea, unable to leave boats or change employers, and their wages were often withheld or severely reduced. While not all workers faced these extreme conditions, most experienced one or more of the challenges and 17% of workers were identified as being in forced labor by the ILO.	The egregious harms occurring before 2014 have decreased, though workers continue to report violence and, more commonly, threats of violence while aboard vessels. Decreases in long-haul fishing trips mean workers are not trapped at sea for months anymore, a significant improvement, and more workers report having contracts and receiving electronic pay. However, with identity documents continuing to be frequently confiscated by vessel owners, workers remain entrapped, limiting their ability to seek help or leave for another job. Overall, though signs of forced labor and human trafficking had decreased from 2014 to just before COVID, signs of forced labor through debt bondage increased again by 2022-2024 to similar levels as before.

Taken together, the indicators highlight a story of uneven progress. Although the most violent and egregious forms of forced labor and human trafficking have been addressed, many workers remain in debt bondage and meet the definition of forced labor, specifically in the fishing industry. There also remain significant disparities in outcomes between seafood processing workers and fishers, resulting from the differences in proximity to the international market, inconsistency of the implementation of reforms, motivations for change, and the inherent isolation workers experience on vessels.

To understand how these contrasting outcomes emerged, it is necessary to trace the system’s evolution across the four key periods of change between 2014 and 2024.

2014-2016: Forced Labor and Human Trafficking Exposed, Catalyzing Bold Reforms

From 2014 to 2016, Thailand's seafood sector underwent a period of unprecedented disruption. International exposure of forced labor and human trafficking through media investigations and NGO reports triggered diplomatic and trade consequences. These actions created immediate reputational and economic risks, elevating human trafficking to a top political priority under the new Thai military government.

Reforms during this period were sweeping but uneven. The Thai government measures were designed to demonstrate compliance with international partners and restore market confidence.

A significant and unprecedented shift was the creation of the **Seafood Task Force (STF) in 2014, which brought together global retailers, Thai seafood companies, and international and Thai civil society organizations.**

Civil society organizations and international NGOs built on existing capacities to scale up their monitoring, advocacy, and direct worker support, leveraging increasing international government and philanthropic funding.

This phase was characterized by bold reforms introduced at speed by the Thai government and in the private sector in response to external pressure. **While enforcement and implementation were inconsistent, the period set in motion systemic changes that defined the trajectory of the next decade.**

To go deeper into this period, visit [Section 3: 2014 Systems Snapshot](#) and [2014-2016: How Change Happened](#).

Problem documented

- CSOs/INGOs investigated, documented, and reported on the problem
- HU funded of the Guardian investigations
- INGOs and trade unions demand the US government put pressure on Thailand

Rapid action

- Rapid action taken by the Thai military government, including adoption of multiple iterations of new legal framework
- Major global retailers formed the Seafood Task Force inclusive of Thai suppliers and others
- Business associations in Thailand adopted new codes of conduct for their members
- Individual businesses started their own changes

Implementation challenges

- Implementation success hindered by many factors including:
- Speed of legal changes and lack of regulatory infrastructure
- Need to align across multiple Thai ministries
- Corruption at multiple levels of Thai government
- Massive disruptions to fishing industry
- Xenophobia in Thailand
- International retailers shifting sourcing of shrimp to other countries

Problem revealed, pressure builds

- Media exposés published in The Guardian, New York Times, Associated Press
- US Trafficking in Persons report downgraded Thailand to Tier 3
- Threat of an EU yellow card

Pressure continues

- Yellow card issued by EU
- Expansion of philanthropic investments to INGOs and Thai CSOs
- Reforms continued, including through cross-sector collaborations
- Workers supported to advocate for their rights by Thai CSOs
- Multiple legal cases advanced and won against perpetrators and human rights activists

Action Continues and Grows

- Thai Union and Mars Petcare made public commitments and took rapid actions to respond, including in partnership with Thai CSOs
- Trial models of worker representation and grievance systems adopted by Thai suppliers
- Launch of ILO Ship to Shore Rights Project in Thailand
- US sent a mixed message with upgrade in TIP report alongside new Tariff Act restrictions

2017-2019: Implementation, Institutionalizing Change, and Emerging Gaps

By 2017, Thailand had moved beyond emergency responses and the government began embedding reforms into institutional frameworks.

Private sector compliance systems matured. **The STF expanded its reach by introducing audit protocols and developing a Vessel Code of Conduct**, which tied membership to improved labor practices. Multinational buyers strengthened sourcing standards and demanded third-party verification.

Civil society organizations deepened their role as watchdogs and technical partners. Partnerships between NGOs and industry expanded, directing informing new practices. Philanthropic investment continued to support advocacy, monitoring, and worker voice initiatives while also influencing private sector actions.

Yet by 2019, clear limitations had emerged.

Compliance frameworks were often procedural rather than substantive. Enforcement of new frameworks by the Thai government remained inconsistent. The absence of legal rights for migrant workers to organize left reforms fragile and dependent on external oversight.

The European Commission lifted the IUU yellow card in early 2019, reducing pressure. Positive supply chain changes demonstrated the influence of coordinated private sector action, government action, and civil society pressure. At the same time, **this period revealed the limits of reforms without stronger worker representation, changes in purchasing practices, or consistent state enforcement.**

To go deeper into this period, visit [Section 3: 2017 - Systems Snapshot](#) for how it began, [2019 - Systems Snapshot](#) for how it ended, and [2017-2019: How Change Happened](#).

2017 Began With...

- A new legal framework in Thailand established
- A new Director General of the Department of Fisheries overseeing the regulatory overhaul
- The continued pressure of EU's yellow card

Private Sector Reforms

- STF tested, refined and deployed multiple new practices including an electronic traceability app
- STF Expanded focus to tuna and IUU.
- Mars Petcare, Thai Union, and Nestlé took additional highly visible steps to improve their supply chains
- Western buyers were actively engaged in research, supply chain mapping, third party assessments and more

Civil Society and Workers

- INGOs and CSOs worked closely with Thai suppliers and Thai government, and participated in STF discussions
- Dramatic expansion of civil society role in Thailand – serving as policy and legal advocates, researchers, direct service providers, expert support to private sector reforms, and training and supporting workers to organize
- Successful prosecution of employers and brokers in precedent setting cases

Changes to Fisheries System Underway

- Vehicle monitoring system (VMS) established
- Rapid amendments to multiple laws and development of regulatory infrastructure
- Improvements in inspection, vessel registration, and electronic traceability, among other changes

Changes to Foreign Worker Management System Underway

- New system designed in 2014 – 2016 now refined and implemented
- Replaced and unified out-of-date prior system
- Implementation challenges and continued revisions to policies and regulations
- Workers remain vulnerable to forced labor due to severe restrictions on changing jobs

International Recognition of Changes Leads to Declining Pressure

- Thailand ratified the ILO Work in Fishing Convention (C188)
- The US upgraded Thailand to Tier 2
- The European Union lifted its yellow card
- Removal of these pressures and acknowledgement of progress enabled decreased momentum

2020-2022: Slowing Momentum Amid Multiple Crises

The COVID-19 pandemic and the 2021 coup in Myanmar created **new vulnerabilities for migrant workers and fractured the improved systems of recruitment, labor rights and oversight.**

COVID-19 containment measures, immigration policies, and social protection programs were often **rooted in structural discrimination against migrants**, heightening risks of forced labor.

The Myanmar coup in 2021 compounded these disruptions, pushing workers into irregular channels, increase migration, and undercutting workers' bargaining power.

Inside Thailand, **political will for reform eroded**, in part due to influence of the National Fisheries Association of Thailand and appointments of industry-linked officials. Yet the legal frameworks of earlier years were not wholly abandoned. Criminal convictions continued and positive changes were made to key laws and regulations.

The **private sector continued to push a variety of reforms forward**. Multinational buyers maintained labor requirements in their supply chains, and Thai companies remained responsive to reputational and market pressures. The STF, the International Labour Organization, and philanthropic partners shifted to a regional strategy.

Migrant workers and Thai CSOs demonstrated resilience. Worker networks organized mutual aid during the pandemic, while CSOs supported legal cases, grievance mechanisms, and factory-level negotiations.

To go deeper into this period, visit [2020-2022: How Change Happened](#).

COVID Disrupts

- Rapid enactment of containment and social protection measures rooted in structural discrimination against migrants
- Fishers were treated like prisoners, unable to leave their vessels
- Quarantine policies forced workers into unsanitary and crowded spaces
- Workers more vulnerable due to the loss of legal status, and many returned home
- PIPO inspection systems effectively collapsed

Industry Changes

- Thai Unio and CP Foods signed agreements to pay fair wages along with other improvements
- Commitments to employer pays principle made by companies and associations, but largely not fully implemented
- Purchasing practices largely do not change, with suppliers bearing the cost burden of improvements

Political Will Declining

- Shift in political structure and leadership of Thai Ministries, led to eroding political will
- Hard-won protections rolled back on child labor
- Increased influence of the National Fisheries Association of Thailand (NFAT), who advocated for further rollbacks
- Yet, continued criminal justice actions against perpetrators

Pressure for Reforms from Inside and Out

- STF, philanthropic leaders, and international government shifted to working on the issue regionally, instead of Thailand specific
- Limited media attention, though where it continued, it led to changes in specific private sector companies
- US downgraded Thailand from Tier 2 to the Tier 2 Watchlist in 2021
- Thai CSOs expanded their support to workers
- Workers successfully organized to protect their rights within specific workplaces

From COVID to a Coup

- Coup d'état in Myanmar altered worker migration patterns and increased worker vulnerabilities
- Myanmar's new requirements for renewing documentation put more migrants in precarious legal status
- Influx of migrants created a "buyers' market" for workers
- Shift by brokers to moving workers between jobs within Thailand, with less focus on bringing workers into the country

The New Normal

- Growing concerns that the new Thai government will rollback changes
- New protections adopted, with laws protecting workers and addressing human trafficking
- Some of the hard-won progress lost during the pandemic and coup.
- Worker knowledge, organizing, and advocacy within workplaces growing

2022-2024: Persistent Risks and Renewed Pressures

By 2023, Thailand's seafood sector faced a dual reality: **Reforms in processing had made significant progress** and, in many ways, were institutionalized, while fishing continued to show more persistent signs of forced labor. International pressure had eased compared to earlier years, but scrutiny did not disappear.

Inside Thailand, **momentum for reform slowed further, and political rhetoric endorsed protecting the fishing industry as a priority**. Civil society actors carried reforms forward through legal advocacy, worker organizing, and continued government advocacy.

This period underscored the **unevenness of change across the sector**. While export-oriented processing showed evidence of durable reform, fishing remained resistant, reflecting the deeper structural challenges of recruitment systems and weak enforcement, and limited worker power. Core conditions within Thailand that have contributed to forced labor also remained the same including **xenophobia, corruption, and laws limiting migrant workers' power**.

By 2024, Thailand's seafood and fishing industries had moved beyond the acute crisis of a decade earlier. Still, the durability of progress remained uncertain, and the risk of rollback — particularly in fishing — was increasingly evident.

To go deeper into this period, visit [Section 3: 2023-2024: How Change Happened](#) and [2024: Systems Snapshot](#).

Legal and Organizing Strategies Continue to Have Success

- Multiple legal cases from 2022-2024 continued to build visibility and accountability
- Legal strategies functioned as a critical systems change tool during period of declining political will
- Thai CSOs continued to support workers to organize and negotiate for their rights in their workplaces, within the limitations of the legal allowability in Thailand

Positive Thai Government Actions

- Even amid declining political will, new and positive resolutions adopted to support management of migrant workers and labor rights for fishers including:
- Increased minimum wage
- Reduction of visa fees
- Criminal sanctions for perpetrators (included in the Work in Fishing Act)
- Easier access to fisheries workers' compensation fund

External Pressure

- Negotiations with EU on Fair Trade Agreement explicitly included labor and human rights
- EU's adoption of Human Rights Due Diligence temporarily pressured Thailand to consider their own legislation
- Certification tools used to assess evidence of environmental and human rights violations questioned by many stakeholders for their appropriateness to monitor for forced labor

Positive Private Sector Actions

- All existing and new STF members demonstrated traceability in supply chains
- Continued cross-sector collaborations to improve supply chain practices
- Expansion of adoption of the employers pay principle

Declining Political Will in Thailand

- NFAT influence continued, including with the winning political party, the Move Forward Party
- All major political parties in Thailand campaigned with a commitment to rollback key fisheries laws
- As of December 2024, legislative revisions to fisheries laws passed first, second, and third readings (variously seen by stakeholders as either rollbacks or recalibrations)

Market Drivers of Forced Labor Remain

- Global retailers continued to place expectations on suppliers to implement required policies without providing financial assistance
- Lack of collective discussion about fair pricing remains a core barrier to STF and the private sector making long-term, durable changes to supply chains

Conditions for Change

The causal analysis of how, why, and under what conditions change occurred between 2014 and 2024 identified a set of seven foundational conditions ([Section 1: Conditions for Change](#)). These were not sufficient on their own to deliver reform, but without them, change would not have unfolded as it did. They bound what was possible and shaped the trajectory of reform in the Thai seafood sector. The first five conditions generally contributed to making progress on developing and deploying the systems and frameworks that were designed to decrease forced labor and human trafficking in the seafood and fishing supply chain in Thailand. The last two conditions served as significant limiting factors, bounding the solutions that were possible and preventing more substantial change from happening.

Condition for Change 1: A common understanding of the systemic nature of the problem emerged and was reinforced through media and international government actions. This included the definition of the problem and the drivers of it, such as the complexity and opaqueness of the supply chain that enables the problem and the lack of legal frameworks to require business models to change.

Condition for Change 2: Stakeholders generally agreed on a shared solution set, though their motivations to act on them varied, as did their beliefs about the viability of different solutions and even their ideas of how to implement the solutions. They included the need for legal and regulatory overhaul and enforcement, strengthening monitoring and surveillance mechanisms, ethical recruitment practices, and worker voice.

Condition for Change 3: The many sectors and stakeholders held self-interested, distinct, and relatively stable motivations to act on the problem. The only exception was the changes in the motivations of the Thai government, which shifted over time as political leadership changed.

Condition for Change 4: INGOs and Thai CSOs had the capacity to support and demand change. Their contributions can be seen from the beginning of the 10 years, in how they helped to build visibility and respond to workers in need, all the way to the end as they protected the gains. Their capacity grew and changed over time, but was present throughout.

Condition for Change 5: Cross-sector collaboration was the norm. The collaborations between Thai businesses, INGOs, Thai CSOs, government agencies, international retailers, and philanthropy often aimed to drive systemic changes, enhancing traceability, improving labor practices, and ensuring accountability across the industry. While not without their challenges, such collaborations were frequent and persistent throughout the period.

Condition for Change 6: Market dynamics underlie both the problem and the solutions. Market dynamics were both a barrier to change (e.g., the global demand for cheap seafood, the drive for competitive pricing) and an enabler for change (e.g., the self-regulation in response to reputational and legal risks). Ultimately, “pushing social compliance initiatives onto suppliers and increasing production costs while sourcing decisions based on the cheapest price is incompatible with eliminating forced labor and human trafficking in the supply chain” (Boles, *Tracking Progress*, 2019).

Condition for Change 7: Key historical, cultural, and political dynamics in Thailand remained constant, including xenophobia and anti-migrant sentiment, legal barriers to worker collective action, government corruption from national to local levels, and government instability. The combination of these factors affected the progress and direction of change along the way. They are also part of why the legal frameworks have not been fully implemented and are at risk of rollbacks in Thailand.

Processes of Change

The 10 years of change in the Thai seafood and fishing system can be understood as a set of overall change processes, with many nuanced and specific changes within them. Where the conditions of change created a foundation that helps us understand why change was possible, the processes of change explain how change happened ([Section 2: Processes of Change](#)).

Process of Change A: Bold and dramatic early actions transformed the system. The Thai seafood industry underwent both abrupt and dramatic systemic changes between 2014 and 2016, alongside more traditional incremental changes over time. This dramatic moment of change was possible in part because key actors in the Thai government, international retailers, and major Thai suppliers could make decisions and act unilaterally, unlike in a more multi-stakeholder or democratic process.

Process of Change B: Individual leaders influenced the change process through their personal and professional power. Influential leaders within the different sectors played critical roles in driving change, as evidenced both by reports of their individual impact and by the decline in progress that occurred as they exited their roles and others replaced them.

Process of Change C: Change accelerated when pressure was high, including highly public pressure through the media and actions of international governments, but also pressure within Thailand from Thai CSOs to their government, from workers to their employers, and from international retailers to their suppliers, among other forms.

Process of Change D: Philanthropic resources were strategically, directly, and dynamically deployed. Evidence suggests that philanthropy's influence on how change happened was not primarily the result of increasing funding to the issue, but rather the strategic and systems-focused deployment of funding along with being deeply embedded in the change processes. Humanity United and Freedom Fund's contributions to how change happened were strengthened by the role they took on "systems convenors" who worked with, supported, and held accountable key stakeholders throughout the multiple sectors and systems.

Process of Change E: Implementation of reforms was incomplete, inconsistent, and under-resourced. Many of the significant laws were adopted and enacted rapidly, requiring multiple revisions and facing challenges in implementation. National and local political will to implement was also inconsistent over time. Private sector implementation of self-regulation practices was inconsistent as well, sometimes due to a lack of buy-in and also due to a lack of resources.

Process of Change F: Environmental sustainability intersected with and influenced human rights priorities. Repeatedly throughout the 10 years, the two issues came together as different actors placed pressure on Thailand, the seafood and fishing industries, and the Thai government. Not all reforms or pressures for reform relied upon this intersection, but at times it was crucial to the process of change.

The six processes of change did not operate in isolation but rather reinforced, amplified, and sometimes constrained each other throughout the decade of reform, while also depending on the underlying conditions for change. Understanding these intersections reveals how systemic change accelerated during certain periods and stalled during others.



Photo: © Stride, Josh/Humanity United. Fishing vessels in Thailand. 2016.

Study Conclusions

The 10-year analysis reveals that formal systems governing labor practices and migrant workers' rights in Thailand's seafood and fishing industries have undergone dramatic transformation over the past decade, though with uneven implementation and recent concerning reversals.

The reforms were real and significant, but uneven. From 2014 to 2024, Thailand's seafood sector experienced sweeping legal, regulatory, and private sector reforms. Processing facilities — especially export-oriented ones — saw marked improvements in wages, contracts, and forced labor prevalence. In contrast, fishing remained persistently high-risk, with debt, document retention, and coercive practices largely intact.

Change was driven by crisis and external pressure. The most dramatic reforms emerged in moments of acute scrutiny, when international governments and global markets imposed reputational and trade consequences. This pressure mobilized political will and accelerated compliance responses, but it also meant progress was often reactive, fragile, and tied to shifting external attention.

Thailand's unique political window after the 2014 military coup coincided with the storm of coverage and international governments' actions to pressure Thailand. That combination enabled the bold and dramatic early actions that laid the foundation for the reforms.

Civil society was catalytic and necessary but also constrained by the context. Thai CSOs and international NGOs grew in credibility, capacity, and influence across the decade. They provided evidence, advocacy, and direct worker support that shaped reforms. Yet persistent restrictions on worker organizing and limited long-term funding kept civil society from fully anchoring durable change.

Philanthropy played a critical and often strategic role in advancing change. The role of a "systems convenor" helped to actively cultivate (1) a common understanding of the problem, (2) a shared solution set, and (3) sustained pressure for change over time. At times, the decisions made by philanthropic organizations created points of pressure that led to meaningful changes. The long-term and ongoing funding of local and international systems change actors was combined with strategic, time-limited actions focused on specific systems-change moments.

Market dynamics remained at the core of the problem, as well as its progress toward solutions. The private sector underwent significant shifts, including changes in beliefs and norms surrounding supply chain responsibility. However, the deeper market culture and practices around pricing remained essentially unchanged, serving as a fundamental barrier to more significant and durable change.

Private sector leadership mattered, but compliance tools reached their limits. Companies such as Thai Union, along with the Seafood Task Force and global retailers, advanced ethical recruitment, supply-chain standards, and traceability. These tools helped eliminate the most visible abuses, but were less effective in addressing deeper structural exploitation, especially at sea.

Market dynamics remained at the core of the problem, as well as its progress toward solutions.

Structural vulnerabilities remain unresolved. The conditions of migrant labor — precarious legal status, reliance on brokers, exclusion from collective bargaining, and xenophobia and anti-migrant sentiment — remained constant across the decade. Without addressing these vulnerabilities, reforms struggled to embed. Gains in processing show what is possible, but fishing demonstrates the risks of backsliding when structural issues persist.

Durability depends on embedding reforms in state systems and worker power. The past decade shows that crisis-driven, externally enforced reforms can shift practices quickly, but they do not secure long-term resilience. Future progress depends on strengthening Thai state enforcement, protecting civic space, and enabling migrant workers themselves to participate directly in shaping labor conditions.

Upon reviewing the findings ([Section 4: Cross-Cutting Conclusions](#)), it becomes evident that the issue of forced labor remains unresolved in the Thai seafood and fishing industries. It may be that the inconsistent and incomplete implementation of reforms, the dependency on industry self-regulation to advance additional reforms, and continued abuses that are visible in the system to those on the ground result in a picture of a system that is still deeply flawed.

Yet, the data also seems to suggest that through a complex array of government reforms, private sector responses and self-regulation, pressure from CSOs, INGOs, and sometimes the media, along with the ongoing visibility of the issue in the global market, **this is a system that has successfully addressed many of the most egregious forms of forced labor and human trafficking, has meaningfully improved conditions on many vessels, in many factories and other seafood processing facilities, and has improved conditions for many workers in migration pathways.** It is a system that has made incomplete progress, but progress nonetheless.

Acronyms

COVID	Coronavirus Disease, referencing 2020 pandemic
CSO	Civil Society Organisation
CSO Coalition	Civil Society Organisation Coalition for Ethical and Sustainable Seafood
DoF	Department of Fisheries
EJF	Environmental Justice Foundation
EU	European Union
GLP	ILO Good Labour Practices
HU	Humanity United
ILO	International Labour Organization
INGO	International Non-Governmental Organization
IUU	Illegal, Unreported and Unregulated Fishing
MCS	Monitoring, Control, and Surveillance
MoL	Ministry of Labour
MOU	Memorandum of Understanding
MSC	Marine Stewardship Council
MWRN	Migrant Workers Rights Network
NFAT	National Fisheries Association of Thailand
INGO	International Non-Governmental Organization
P29	Protocol of 2014 to the Forced Labour Convention, 1930
PIPO	Port-In/Port-Out
RTG	Royal Thai Government
STF	Seafood Task Force
TFFA	Thai Frozen Foods Association
THB	Thai Baht
TIP	Trafficking in Persons
TTIA	Thai Tuna Industry Association
UK	United Kingdom
UN	United Nations
USD	United States Dollar
VMS	Vessel Monitoring System

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Introduction

Forced labor and human trafficking in global supply chains are systemic issues, not limited to a few bad actors. For this reason, efforts to eliminate these harms have required far more than prosecution and removal of those most directly involved in enslaving and otherwise harming workers. Changing this system requires examining the roles of global and market dynamics, in-country governance, civil society support, and the actions of individual employers and the sector as a whole. For more than 10 years, many philanthropic and international governing agencies have sought to address the issues in Thailand and, more recently, regionally.

This report explores 10 years of effort specifically focusing on work in Thailand, including the wide range of influences and actors that have helped to change it (and prevented changes) over the last decade. Humanity United and the Freedom Fund commissioned the study. While they are curious about their own contributions to change, the study's primary purpose is to understand how, why, and under what conditions change happened in the seafood and fishing industries within Thailand over the 10 years, as relates to forced labor and human trafficking.

The study sought to answer the following questions:

-  **Population-Level Impact:** How prevalent and severe is forced labor and human trafficking in the Thai seafood industry today compared to 10 years ago? *Note: This question was answered through existing research, such as International Labour Organization (ILO) and Human Rights Watch (HRW) reports.*
-  **Formal Systems Change:** How have government, private sector, and civil society formal requirements and behaviors that contribute to or decrease forced labor and human trafficking changed over the past decade?
-  **Social Systems Change:** How have relevant informal norms, beliefs, perceptions, and commitments shifted?
-  **Drivers of Change:** What were the primary drivers of these shifts including the contribution of the approach used by HU, the Freedom Fund, and its partners?
-  **Funder Practices:** How have HU and Freedom Fund approached their role in catalyzing and supporting systemic changes?
-  **Future Needs:** What is the evidence of the durability of positive changes in light of continued changes within Thailand and regionally, and what are the remaining needs to decrease forced labor and human trafficking in Thailand?

An additional area of focus was added as part of a deep dive into how the civil society organizations (CSOs) in Thailand contributed to and experienced change:

-  **Thai CSOs:** How and under what conditions did CSOs in Thailand contribute to changes in the Thai seafood system from 2014-2024 in Thailand? How did the CSOs themselves change over time?

The study **defined systems change** as the collective and aligned efforts of many different individuals and organizations to target the root causes of forced labor and human trafficking in the seafood and fishing industries, seeking durable, institutionalized changes across public and private sectors, including (but not limited to) changes in policies, resource flows, practices, relationships, norms, beliefs, and power dynamics.

The study used a combination of stakeholder perspectives from more than 50 people deeply involved in the changes over the last 10 years and public and private reports detailing specific changes and the impact on migrant workers.

Understanding how and why change happens, and under what conditions, requires the compilation of generally accepted facts while weaving together the perspectives and beliefs of many different stakeholders.

A robust research design included quality of evidence assessment tools to ensure each element of the findings was grounded in multiple sources of evidence and perspectives. These perspectives included people representing all of the organization and cross-sector coalition types in the list to follow, but were weighted more heavily to non-governmental organizations as compared to the private sector and government entities.

The sources of evidence for the findings are indicated throughout to provide maximum transparency on how these conclusions were made. The sources are included in the endnotes, which refer both to documents and specific stakeholder data (interviews, focus groups, and discussion groups, all labeled by stakeholder type). Additionally, the key findings were made available to all study participants for feedback and revisions and additions made in response to feedback are also cited in the endnotes.

Definitions of Organization Type

For the purposes of this study, the following definitions will be used to group organization types:

- **Thai suppliers:** This group includes large suppliers, some with global reach, like Charoen Pokphand (CP) Foods and Thai Union. It also includes the factories, shrimp farms, and other businesses that contract with and provide supply to the large suppliers and international buyers.
- **Vessel owners:** Although vessel owners are part of the supply chain, they largely did not follow the same pattern of behavior as other parts of the supply chain. For this reason, they are separated into their own group in the analysis.
- **International retailers/supermarkets:** This group includes major brands and supermarkets like Walmart, Costco, Mars Foods, etc. It also includes some of the smaller supermarket brands in specific countries.
- **Thai government:** This group includes the Prime Minister, his office, and all of the ministries. It also includes the implementors, such as Thai police and military.
- **International governments:** This group includes the United States (U.S.) and the European Union (EU). Largely, the analysis separates these two governments due to their unique roles.
 - The International Labour Organization (ILO) is neither a government organization nor a nonprofit in the traditional sense. It is a specialized agency of the United Nations (UN), while also having representatives from governments, employers, and workers' organizations. Yet, for analytical reasons, it was treated as a government entity that acted to influence Thailand from outside the system and country.
- **INGOs (International Non-Governmental Organizations and Unions):** This group includes the non-governmental organizations whose work is largely outside Thailand, such as Human Rights Watch (HRW) and the Environmental Justice Foundation (EJF), though some have offices in Thailand or leadership from Thailand. Also, for the sake of analysis and not being individually named more often than other organizations, specific international unions have been included in this group.
- **Thai CSOs (Civil Society Organizations):** This group includes the civil society organizations based in Thailand, such as the Migrant Workers Rights Network (MWRN), Raks Thai Foundation, and Stella Maris.
- **Migrant workers:** This group includes migrant workers in Thailand on vessels (fishers) and in processing facilities ranging from farms to peeling sheds to factories (seafood workers). These workers have mostly migrated from countries in the region including Myanmar and Cambodia.
- **Media:** This group includes the Associated Press, The Guardian, The New York Times, and the Outlaw Ocean Project (a nonprofit journalism organization).
- **Philanthropy:** International philanthropic organizations that contributed funding to CSOs, INGOs, and private sector collaborations.
- **Cross-sector collaborations:** Two critical entities are often named individually, representing distinctly different cross-sector roles. In the analysis, they are also considered in the context of other examples of cross-sector collaborations that are not as formalized or large:
 - The Civil Society Organisation Coalition for Ethical and Sustainable Seafood (CSO Coalition) which was initiated with support from philanthropy, led by an INGO, and has Thai CSO member organizations.
 - The Seafood Task Force (STF), which has membership across most groups above.

Forced labor is defined using the International Labour Organization's definition from C029 - Forced Labour Convention, 1930 (No. 29):³

“ The term forced or compulsory labour shall mean 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. ”

Forced labor is operationalized using the indicators from the ILO:⁴ abuse of vulnerability, deception, restriction of movement, isolation, physical and sexual violence, intimidation and threats, retention of identity documents, withholding of wages, debt bondage, abusive working and living conditions, and excessive overtime.

Figure 1. A visual summary of the study focus and boundaries



Study Context and Boundaries

The scale of change that occurred is vast, with actors and actions happening across the globe and within Thailand at local and national levels. **In order to create parameters for the study and investigate more fully where the majority of the relevant changes were happening, the following were the study's boundaries (Figure 1):**

- The focus was 2014--2024, with acknowledgement, but not deep investigation, of prior years. The complex and rapid changes of 2025 are not included.
- The focus was on Thailand's seafood and fishing industries, with the following sectors/actors included as part of the system: Thai government (overall, labor-focused, human trafficking and migration-focused, and political context); Thai CSOs, Thai suppliers, Thai workers, international retailers/supermarkets sourcing seafood from Thailand, and INGOs that worked with Thailand. It also includes the Seafood Task Force and CSO Coalition, both created in response to other events within this story.
- Other important influences on the Thai seafood and fishing system included the media, the EU, the U.S.

government, the ILO, academics, and consumers. These all functioned as points of significant pressure on the system at various times. Their impact is central to the analysis, but their motivations and reasons for acting were not investigated. This bounding allowed for a deeper investigation of the motivations, actions, and influences of those most directly within the Thai seafood and fishing system.

- The focus is on Thailand. Regional dynamics have put pressure on Thailand in a variety of ways and that is covered in the report. However, no attempt was made to explain the larger regional context, drivers of regional dynamics, or otherwise evaluate and study the regional issues.
- The focus is primarily (though not exclusively) on the export supply chain, from fishing vessels through processing facilities and purchasing by international retailers. Thailand also has smaller fishing vessels and processing facilities that serve the domestic market. These are not included as they were only indirectly influenced by the change processes that occurred as a result of the global pressures and are the center of the overall change story presented here.

Study Team and Participants

The study was led by Dr. Jewlya Lynn at PolicySolve, LLC in partnership with Patporn Phoothong, an evaluation and human rights consultant in Thailand. Roisai Wongsuban, a former Freedom Fund staff member in Thailand, assisted with organizing interviews, focus groups, and other in-Thailand research activities. Her relationships and familiarity with the context were critical. A research assistant, Kiran Obee, also supported the initial document review. The team's skills and capacity relevant to this study included two decades of expertise in systemic change along with causal pathways evaluation and related methodologies, qualitative analysis, coalition and network management, Thai migrant workers' history, current context and needs, and Thai culture and context.

The program staff at Humanity United and Freedom Fund helped guide the study throughout including identifying the evaluation questions, approving the design, identifying the initial documents for review, and identifying many (though not all) interviewees. Additionally, study findings were explored with participants during a feedback process after initial analysis was completed.

Methods

This study methodology is a combination of descriptive qualitative analysis and causal mapping. Causal mapping is a powerful analytical tool for making sense of how, why, and under what conditions change happened including in complex, dynamic environments. A historical analysis approach was integrated with the causal mapping methodology in order to examine patterns that emerged over time. In this approach, qualitative and secondary data are used first to describe the state of the system, and then causal data are used to understand the process of change. A more detailed explanation of the methodology can be found in the methods appendix.

The study was deployed in three phases:

- Phase I: Outlining how and why change happened using five initial scoping interviews and a review of an initial 30 documents identified by the Humanity United and Freedom Fund teams.
- Phase II: Deeper investigation of how, why and under what conditions change happened, using:
 - Individual interviews with 23 people were conducted virtually and in-person in Bangkok with representatives of the Thai government, INGOs, private sector including international retailers, Thai suppliers, and vessel owners; private sector consultants, researchers who studied the system, cross-sector coalition leaders and managers, and philanthropic program managers.
 - Two focus groups with migrant worker leaders who both work in factories and on vessels, and also help to organize and advocate for fellow migrant workers, with a total of 16 participants.
 - Four discussion groups with a total of 19 participants, separated by sector, that focused on testing the initial causal pathways revealed from the analysis and refined by the preceding groups. The groups had the following groupings of participants: INGOs advocating and working in Thailand, Thai suppliers and associations, INGOs working closely with the private sector, and INGOs working closely with CSOs.
 - A deep dive with 10 Thai CSO leaders, including eight hours of discussion groups, plus individual follow-ups as needed, and interviews with INGO leaders who worked closely with the Thai CSOs.

- Document review of an additional 105 resources to further flesh out the story, including identifying key events, exploring changes in outcomes for workers, and adding deeper contextual understanding. Documents were identified by the research team and by study participants (each interviewee and discussion group was encouraged to forward on relevant documents).
- Phase III: Analysis of all of the above, with emailed follow-ups with key stakeholders to confirm findings and explore conflicting findings. This analysis process utilized an AI assist, which is explained more fully in the methods appendix.
- Phase IV: Feedback on the cross-cutting findings covered in Sections 1 and 2 of the report, leading to revisions as indicated in the endnotes, from 16 stakeholders who participated in the study. Those who wished to be named as reviewers of the study are included in the acknowledgements page, and additional unnamed reviewers also gave feedback.

Findings Overview

The findings are broken into four interrelated sections (Figure 1).

The **first section explores the conditions** that enabled change to happen the way it did. These foundational conditions remained relatively stable or progressed in strength over time. They directly influenced many different types of change in the system and without them, change is unlikely to have occurred the way it did. These conditions included:

- 1 A common understanding of the problem emerged and was reinforced through media and international government actions
- 2 Stakeholders generally agreed on a shared solution set
- 3 The many sectors and stakeholders held self-interested, distinct and relatively stable motivations to act on the problem
- 4 The INGO and CSO organizations had the capacity to support and demand change
- 5 Cross-sector collaboration was the norm
- 6 Market dynamics underlie both the problem and the solutions
- 7 Cultural and political dynamics in Thailand that remained constant

The **second section explores the processes by which change happened**. These processes are much more dynamic than the conditions, directly responding to what is happening at different moments in time and not occurring consistently throughout the 10 years. Some of these are clearly enablers of positive change, while others disabled change, protected the original status quo, and sought to return to it. This section also ends with an analysis of how the processes and conditions interacted to drive change.

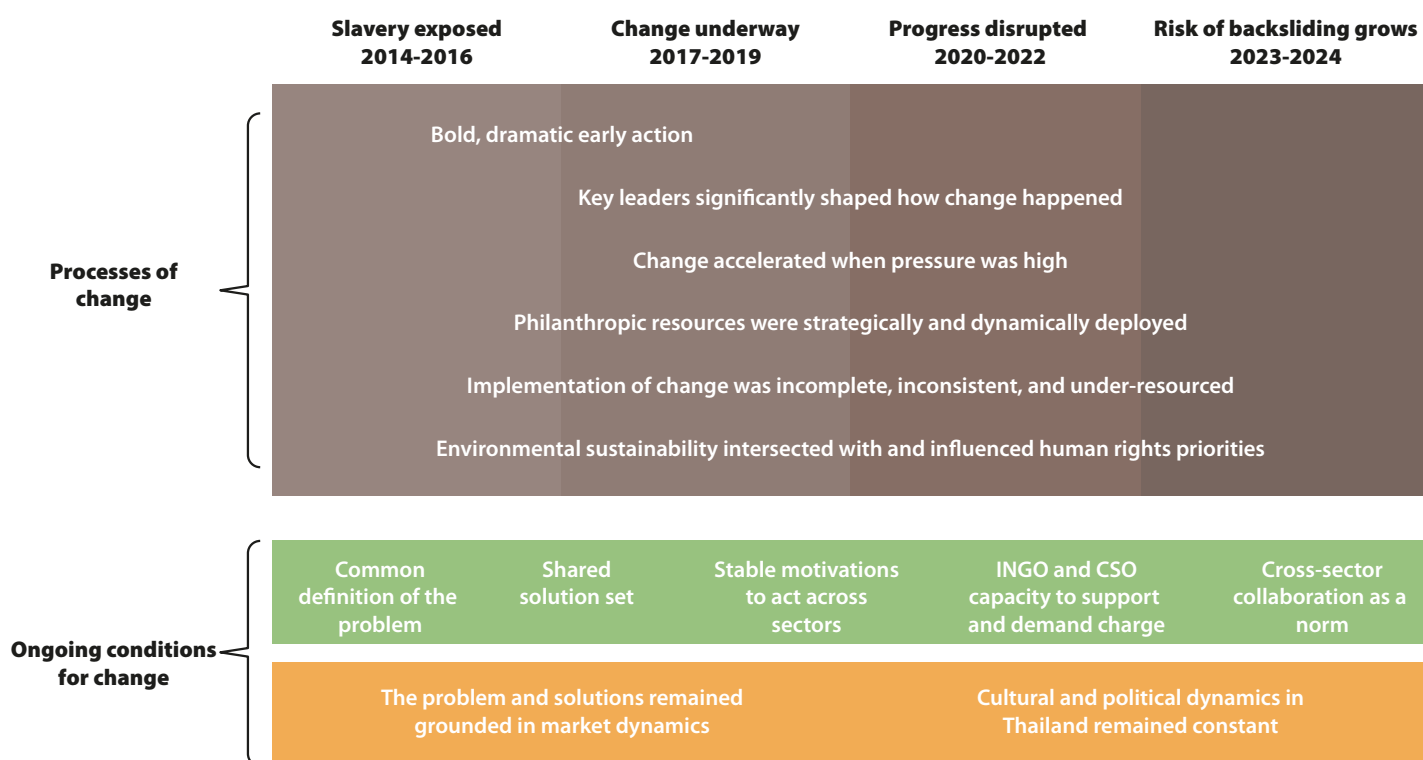
The processes of change include:

- A Bold and dramatic early actions transformed the system
- B Individual leaders shaped how change happened through personal and professional power
- C Change accelerated when pressure was high
- D Philanthropic resources were strategically and dynamically deployed
- E Implementation of change was incomplete, inconsistent, and under-resourced
- F Environmental sustainability intersected with and influenced human rights priorities

The **third section explores the changes and their impact on workers**, broken into four time periods, with an exploration of how and why change happened, what the system looked like, and worker outcomes within each point in time.

- ➔ Forced Labor Exposed: 2014 systems description and changes from 2014-2016
- ➔ Change Underway: 2017 systems description and changes from 2017-2019
- ➔ COVID and Myanmar coup disruptions: 2020 systems description and changes from 2020-2022
- ➔ Risk of Backsliding Grows: 2023 systems description and changes from 2023-2024

Figure 2. A visual summary of the conditions, processes, and time periods



The 2014 “Modern Slavery in Focus” articles in *The Guardian* and *New York Times* article “Slavery and the Shrimp on Your Plate” (2014) framed the issue as one of slavery, forced labor, and human trafficking.

This third section is where the ultimate impact of the work is explored — the impact on migrant workers in the Thai seafood and fishing industries, including how conditions did or did not improve over time. It is also where the most significant changes are described and clear causal relationships are explained between some of the conditions, processes of change, and specific changes that happened in the system.

The **fourth section is a conclusion that answers the study questions**, bringing together the findings from the previous three sections.

The **appendices cover the methods in more depth** and give examples of protocols used in the study as well as the documents used.

Section 1: Conditions for Change



Photo: © Stride, Josh/Humanity United. Vessel at Port-In/Port-Out Center in Thailand, 2016.

Seven foundational conditions were identified that appear to have enabled and bound how change in the Thai seafood system happened over the last 10 years. Without these seven conditions being in place throughout the time period, change would not have happened as it did. Many of these conditions are not typically found or look quite different in other systems where efforts to tackle complex problems are underway.

These conditions remained relatively stable throughout the 10 years, with two exceptions:

- A shift from the Thai military government and the Thai democratic government in terms of motivations to act; and
- Increases in some of the conditions over time, such as increasing capacity among INGOs and CSOs (though even at the beginning, capacity existed).

The first five conditions generally contributed to making progress on developing and deploying the systems and frameworks that were designed to decrease forced labor and human trafficking in the seafood and fishing supply chain in Thailand. The last two conditions served as significant limiting factors, bounding the solutions that were possible and preventing more substantial change from happening.



Photo: © Stride, Josh/Humanity United. Vessel at sunset in Thailand. 2016.

Condition for Change 1: A common understanding of the systemic nature of the problem emerged and was reinforced through media and international government actions

In the case of the Thai seafood system changes from 2014–2024, most stakeholders across most sectors held a common understanding of the systemic nature of the problem:⁵

The supply chain in Thailand, including fishing and seafood processing, has severe labor exploitation and human trafficking of vulnerable migrant workers, driven by global demand for cheap seafood and low accountability, alongside illegal, unreported, and unregulated (IUU) fishing practices.

Evidence suggests that **this common understanding was shaped by some stakeholders and imposed on others, but generally not questioned** as to whether it was legitimately an issue or had been for some time.

“Fleets to date haven’t operated without the use of forced labor. Working conditions compelled of the fishers are so clearly beyond any sort of reasonable or lawful outlines. It is clear the intent is to use the advantage of having these men at sea to work them to the bone.”

NGO Stakeholder from IJM and Urban Institute 2017 study⁶

Thus, though there may not have been a sense of collective ownership for solving the problem,⁷ there was a collective acknowledgement of the problem. As of 2014–2016, this included a generally held understanding that:⁸

- Workers are being severely exploited, with both high prevalence and severity of issues related to forced labor and human trafficking in the fishing and seafood industries.
- Exploitation begins even as workers leave their home countries, resulting from unethical recruitment practices and working with dishonest brokers.
- Migrant workers are vulnerable, in part due to their often illegal or precarious legal status, the requirements associated with legal migration, and their isolation from other societal supports.
- The problem is entrenched in the fishing and seafood industry business model, which is driven by the combined demand for cheap seafood and lack of oversight.
- The complexity and opaqueness of the supply chain enables the problem to remain hidden and accountability to be difficult to assign.
- The legal frameworks guiding systemic reforms in Thailand were inadequate, and enforcement of existing legal requirements was ineffective.

Stakeholders who recognized and acknowledged this problem and its understanding included all the major public and private stakeholders, with the exception of parts of the fishing industry in Thailand (e.g., vessel owners and their association).⁹ Not all stakeholders shared the same understanding of the problem’s degree (how widespread and severe the abuses were) or the same sense of urgency to address it. However, most recognized that these problems affected both the livelihoods and human rights of migrant workers.

The Origins of the Common Understanding

This common understanding was foundational to the reform process that followed. Its development can be tied back to the **media coverage** that described the problem in graphic and compelling – as well as systemic – tying the harms caused to workers to the larger seafood industry and global supply chain. Groundbreaking media reports from The Guardian, Associated Press, and New York Times in 2014 and 2015 held international retailers/supermarkets and Thai suppliers and government responsible for the harms occurring, establishing the link between widespread labor abuses and seafood consumed in Western markets.¹⁰ This media exposure depended on both investigative journalism and extensive data and stories collected and shared by Thai CSOs and INGOs.¹¹

The common understanding was **further reinforced through the actions of the EU, U.S. government, and ILO** early in the reform process, including the U.S. government’s downgrading of Thailand via the United States’ Trafficking in Persons Report and the decision by the EU to issue a yellow card with the implicit understanding that it was linked to Thailand’s well-documented human rights abuses in the fishing and seafood industry.¹²

Condition for Change 2: Stakeholders generally agreed on a shared solution set

A core set of solutions was widely understood early in the change process as needed, and continues to be understood as necessary today. This shared understanding of the solution set was held by those in positions to affect change, though perspectives on their viability and the best way to design and implement the solutions were less widely aligned. Some stakeholders championed these solutions themselves, while others may have felt the solutions were imposed, but were willing to act due to their high level of motivation. Nonetheless, these solutions were largely acknowledged along the way. Difficulties often arose not from debating what was needed, but from differing opinions on what could realistically be implemented and where within the supply chain, as well as issues with the quality, consistency, and sustainability of implementation. As one INGO participant stated, “the devil is in the details” and for some, implementation of the solutions was more performative than effective.

These generally agreed-upon solutions can be grouped into the categories below. While other solutions were also pursued, many of those were related to or fit under one of these broader categories.¹³

Legal and Regulatory Overhaul and Enforcement: There was and still is a broad consensus within Thailand, with the EU and U.S., and among the buyers and suppliers, that Thailand needed to overhaul its legal and regulatory environment as relates to labor and human trafficking, as well as the management of the fishing industry more specifically (for both environmental and human rights reasons). Many of the specific changes within the legal frameworks were also generally seen as necessary, including workers having contracts, access to their documents, regularized and electronic payment, pathways to address grievances, etc.¹⁴

The legal and regulatory overhaul, widely agreed upon as necessary, included specific requirements for vessels, factories, and recruitment brokers, as well as the development of government oversight systems, all of which went beyond protecting individual worker rights. These requirements fell into many of the categories below.

Strengthening Monitoring, Control and Surveillance (MCS) Mechanisms: There was and still is broad consensus on the need for robust MCS tools, some of which were included in government reforms. Stakeholders generally agreed that monitoring was needed at the ports when vessels leave and arrive, in other seafood workplaces such as factories, remotely when boats are at sea, and through the digitization of documentation using modernized IT systems and databases.¹⁵

Some of the monitoring mechanisms that had widespread agreement can be implemented directly by the private sector, such as mapping supply chains, conducting audits and inspections within their supply chains, implementing traceability protocols, and other forms of supply chain oversight.¹⁶ Other MCS tools are supported by some and questioned by others. For example, certifications and audits are seen by some stakeholders as unable to truly capture human rights violations, highlighting the difference between agreeing on a general solution needed and agreeing on specific tools.

It is worth noting that many private sector stakeholders (and some from other sectors) have seen supply chain oversight and management practices as not viable with lower tiers of the supply chain (e.g., fishing vessels). Others have argued this is no longer true, given the ability to utilize technology to trace the origins of products, and efforts have been made to collect more data and identify where forced labor is present within the supply chain, all the way down to the individual vessels.¹⁷

Ethical Recruitment Practices: Stakeholders generally agreed (and still do) that businesses need to adopt ethical recruitment practices, with specific solutions often including the employer pays principle, direct hiring, and ensuring workers have access to contracts and written information about the jobs they are pursuing to prevent false promises and deceptions about work conditions.¹⁸

Implementation of these practices often highlights differences in how people understand them and levels of commitment to ensuring they are used. For example, the importance of safe migration pathways is acknowledged, while many businesses continue to leverage independent or third-party brokers and pay only for the recruitment fee and no other expenses, such as passports, visas, health checks, etc.¹⁹

Worker Voice: The recognition that the system needs to have worker voice processes and practices was generally shared from the beginning, but the understanding of what this looks like varies by sector, varies between those inside and outside Thailand, and has changed over time. It has ranged from having grievance processes that include follow-up with employers to change practices (e.g., the ISSARA model as one example) to workers self-organizing to demand action by their employers and addressing problems (International Transport Worker’s Federation unionization model)

to an in-between model, where workers are actively supported by CSOs to advocate for their needs and access legal processes as needed (the most commonly found model currently). Some stakeholders also support worker welfare committees – though this approach is controversial – allowing for an organized pathway for grievances to be addressed.²⁰ Finally, worker voice is recognized as having a precursor: workers must have knowledge of their rights to recognize when they are violated. Thus, there is widespread support for worker rights education.²¹

All of these models have different limitations and strengths. Within these, some are currently having success helping workers address problems, while others are facing barriers, including the fact that organizing and collective bargaining by migrant workers is not permitted under Thai labor laws.

As evidence of the continued agreement on the four solution sets listed above, stakeholders from across the public and private sectors, including CSOs, INGOs, retailers/supermarkets, Thai suppliers, and Thai business associations, have advocated for their protection and continued expansion even as the Thai Government has begun to roll them back.²² The exception is the buy-in and agreement from the vessel owners and the National Fisheries Association of Thailand (NFAT). This is a significant group of stakeholders who largely disagreed with the proposed solution set.²³ However, even among vessel owners, some chose to participate in pilot processes that helped them respond to the new rules and regulations.²⁴

Condition for Change 3: The many sectors and stakeholders held self-interested, distinct, and relatively stable motivations to act on the problem

The motivations most common within each sector largely remained the same, except for those that shifted with changes in Thailand's government leadership. The stability of the motivations was matched with varying levels of demand to act, as pressure to act ebbed and flowed (see the Process of Change D below). The motivations may have remained the same in part due to the nature of the problem and the context of the overall market system largely remaining the same.

Recognizing the nuance in motivation by organization within each of the following groupings, the motivations to act can be understood as including the following.

International Retailers/Supermarkets: Their primary motivations were reputation, financial risk, and the need for resilient and secure Thai supply chains, initially triggered by media exposés and threats of consumer boycotts, and later reinforced by actions from the EU and U.S. governments.²⁵

Thai Suppliers (minus vessel owners): Thai suppliers' primary motivation was economic survival and the ability to continue to export their seafood products into the global market, including to the EU and U.S.²⁶ Their economic survival depends on addressing the problem not only in their own supply chains, but equally important, in repairing the Thai seafood industry's reputation more broadly so that they could "resume exporting and keep our industry alive."²⁷

Vessel owners: Vessel owners' motivations were economic, focused on avoiding additional expenses and acting only when the business value was clear, given the tight margins they already operated within. Vessel owners also were more removed from the export market, with much of their product going to Thai processing facilities, somewhat insulating them from the pressures experienced elsewhere in the Thai supply chain.²⁸

Thai government: The Thai government's motivation throughout the 10 years was to protect the seafood and fishing industries, but what this meant and what parts of the industry they sought to protect shifted over time.

2014-2019: Military rule (National Council for Peace and Order – the NCPO with Prayut Chan-o-cha as Prime Minister): The primary government motivation was protecting the nation's reputation and its critical seafood export industry (even at the expense of the fishing industry more specifically), recognizing its role as an economic engine for the country. Protecting the industry meant not losing access to important markets, including the U.S. and Europe.²⁹ Evidence also suggests that the military government presented the human rights violations as a problem that the previous civilian government had been unable to manage and that they now could. Acting quickly on the issue was a way to rapidly demonstrate the positive impact of the new regime and repair the reputational issues associated with the coup.³⁰

2019 - 2023: Military dominated, semi-elected government (Prayut Chan-o-cha continuing as Prime Minister): The transitional government in Thailand continued to be motivated to protect the Thai seafood export industry and Thailand's international reputation, but is also beginning to shift what it means to protect the industry as a response to the decline in export sales, increasing political power by the vessel owners, and the disruptions of COVID and the Myanmar coup.³¹

2023-2024: Elected government (Pheu Thai-led Coalition with Srettha Thavisin as Prime Minister until his removal in August 2024 and replacement by Paetongtarn Shinawatra): The newly elected government continues to be motivated by protecting the Thai seafood industry, but with a significant shift toward the needs of the fishing industry. The motivation by this time is clearly affected by the decline in export sales, the politically influential presence of NFAT and vessel owners, and the need for economic development more broadly. Protection framing centered on the negative impact on vessel owners and a general commitment to sustainability, without the same focus on Thailand's reputation related to human rights.³²

International NGOs: INGOs saw the crisis as an opportunity to draw global attention to human rights due diligence in supply chains across sectors and industries and bring a human face to the abuses in Thailand.³³ Many INGOs were also motivated to bring specific solution sets to address the problem, drawing on their strengths and experiences in other settings.³⁴

Thai CSOs: Thai CSOs had already been involved in human trafficking issues for years before the 2014 crisis. Their core motivation was to address the systemic abuses and to build worker power (though definitions of worker power varied by organization and over time), ultimately to improve outcomes with and for workers.³⁵ Some interviewees also argued that a primary motivation was to secure funding by engaging on an issue that had international attention.³⁶

Global Philanthropy: Philanthropic organizations were motivated by the desire to address issues within the “modern slavery” movement more generally, and were drawn to Thailand due to the opportunity for impact. Philanthropy was also motivated to demonstrate the value of strengthening civil society organizations and building worker power as a means of influencing the issue.³⁷

Condition for Change 4: INGOs and Thai CSOs had the capacity to support and demand change

Throughout the 10 years, evidence was clear that consistent involvement of INGOs and Thai CSOs contributed to many different changes. Their contributions can be seen in the evidence and visibility of the problem, policy changes, and implementation of policies by the Thai government, changes required by international retailers, and the changes developed and implemented within the Thai supply chain at all levels. and actions and outcomes for individual migrant workers in the fishing and seafood industries. Although capacity and coordination increased significantly by the Thai CSO organizations over the 10 years, they were already actively involved in influencing changes by and even before 2014.

One way to **understand the shift in INGO and CSO capacity over time is by recognizing the context in which they were working.** Prior to 2014, Thailand had an underdeveloped legal framework and a lack of government oversight infrastructure or even government spaces where reforms were actively being designed. There was also a lack of global pressure for change that led to receptiveness from large corporations (Thai suppliers and international retailers).³⁸ INGOs and CSOs were working in the spaces that did exist, primarily as watchdogs, evidence generators, legal support, and direct support to workers (including organizing within their work environments and providing services to workers experiencing harms).³⁹ Their larger and more complex systemic change work was enabled by the dramatic shifts in 2014. Once this existed, they took on many different roles.

Their larger and more complex systemic change work was enabled by the dramatic shifts in 2014. Once this existed, they took on many different roles.

Thai CSOs and INGOs took on a critical watchdog role to hold the Thai government and market actors accountable. With resources provided by philanthropic organizations, the ILO, and even the private sector, they conducted research, documented systemic problems and worker outcomes, and publicized their findings, including in partnership with media outlets. This began before 2014 and continued throughout the 10 years. Prior to the 2014 storm of visibility and changes, MWRN, the MAP Foundation, and the Yaung Chi Oo Workers Association, among others, had already supported workers to advocate for their rights in related sectors and in major Thai processing companies including Marine Gold, Patana Frozen Foods, Thai Union, Crystal Frozen Foods, among others.⁴⁰ Thai CSOs were also helping with the prosecution of cases of labor abuse (e.g., the highly visible Kantang cases as well as other successful convictions), recognizing that at the time, the laws were limited and confusing, making it difficult to do this work.⁴¹

Thai CSOs and INGOs also worked directly with the Thai government, invited to participate in shaping policy at times and pressuring for policy changes from the outside at other times. Their dual role of holding the government accountable and being a partner in change was acknowledged as one of the complexities of the change process, yet one that went surprisingly well. Specific INGOs and CSOs have been, at times, welcomed by the government for their expertise, research, and ability to monitor the implementation of laws.

“ [EJF] gave us recommendations of many things, some working and some not. They set up a team in Thailand to work with us [the Thai government], called IUU hunters. They went out with our personnel to help enforce the law. They know exactly how the government works and thinks. They are the ones who can talk to everybody outside and be believed. ”

Thai government interviewee⁴²

Thai CSOs and INGOs were also **invited into or led many different cross-sector collaborations**. Their expertise, particularly related to the risks and needs of migrant workers, as well as sometimes related to business supply chains, contributed to the design of many different international retailers' requirements and Thai suppliers' new practices. Thai CSOs often played critical supporting roles in implementing policies and solving problems on the ground, working with the government or the private sector. For example, the Stella Maris Seafarers Center worked with government agencies in Songkhla province to help the agencies develop work practices that ensured information collected during Port-In/Port-Out (PIPO) inspections was utilized by the Social Security Office to confirm Compensation Fund contributions by employers. This contributed directly to the cross-agency cooperation that led to easier and more reliable payments for workers from the Workers Compensation Fund, which was supported by close collaboration between the government and CSOs.⁴³

Overall, this group of critical organizations was **recognized as bringing credibility, expertise, and capacity as well as maintaining pressure for change throughout the 10 years**. They were also recognized as building a movement over time, suggesting their capacity both increased and was also more fully aligned to put pressure on the system for change.

There was some variability in perceptions of whether the INGO and Thai CSO organizations needed to take on all of the different roles that they did. Some interviewees working with international retailers suggested that too many different organizations were involved at once, not coordinating what they advocated for or the solutions they wanted to see implemented. More interviewees, such as those from INGOs, Thai CSOs, and philanthropy argued that the diversity of organizations and actions that made up the “movement” was part of why so much change happened.⁴⁴

“ A lot of different advocacy initiatives led by local coalitions and international coalitions started to pinpoint different problems with the Thai legal and policy frameworks and problems with the corporate supply chain model contributing to the abuses. It wasn't one advocacy initiative or another that led to the changes, but rather the movement. It was a powerful movement with all of these different actors – some more willing to collaborate with corporate actors, some more focused on name and shaming, some who wanted to do supply chain monitoring activities. All of them together created a powerful movement that got the attention of the U.S. government, the EU, and all of that combined put a lot of pressure on the government to make those changes. ”

Philanthropic interviewee⁴⁵

Despite the many and increasing roles that Thai CSOs and INGOs took on over time, **they also faced a variety of limitations and challenges**. Initially, Thai CSOs were largely uncoordinated, lacked expertise in the technical solutions needed to address worker exploitation, and had limited experience working directly with the private sector. Conflicts also existed between organizations, driven by ideological differences, power dynamics, and competition for funding. This is particularly true between Thai CSOs and INGOs, with the INGOs being seen as more powerful due to greater access to international funding. Some Thai CSOs also had organizational challenges they worked to address during this time, including strengthening their financial and safeguarding practices. Additionally, across both CSOs and INGOs, organizations reported they had to align their agendas with funders' priorities, which also limited the scope of their actions.⁴⁶

Condition for Change 5: Cross-sector collaboration was the norm

Cross-sector collaboration has been a prominent feature in efforts to address forced labor and improve conditions in the Thai seafood supply chain, involving various actors including government agencies, international and Thai businesses, INGOs, Thai CSOs, and philanthropy. These collaborations often aimed to drive systemic change, enhance traceability, improve labor practices, and ensure accountability across the industry.⁴⁷ Not all were equally successful, and **cross-sector collaborations faced less resistance as more successful examples were experienced, resulting in stronger and more frequent partnerships over time.** The sectors partnering with each other also shifted over time, with partnerships early on between INGOs, Thai CSOs, and the media and the addition of more frequent partnerships over time between the private sector, government, INGOs and Thai CSOs. These partnerships typically had unequal power dynamics, often with the private sector and government holding greater power than INGO and CSO partners invited to their tables.

Two cross-sector partnership tables were created in the early years of change, both of which remained active throughout:

Seafood Task Force: The Seafood Task Force (STF) is a major industry-led initiative established in 2014 and has included international retailers, Thai suppliers, INGOs, Thai CSOs, and active partnership with the Thai government, along with involvement of international philanthropic organizations.⁴⁸ It originally focused on shrimp before expanding its focus to include tuna. This necessary space for private sector coordination with partnership from other sectors created a place where industry-wide change could and in some ways did happen, particularly among the Thai suppliers. However, not surprisingly given its multi-stakeholder and relatively high-stakes decision-making context, it also had limitations that contributed to a slow pace for reforms and, according to some stakeholders, a focus on the “low-hanging fruit” reforms that had the least cost and greatest reputation and market-protecting benefits specifically to the international retailers/supermarkets involved.⁴⁹

Civil Society Organisation Coalition for Ethical and Sustainable Seafood (CSO Coalition): In 2016, a locally-based leader from Oxfam helped to form the CSO Coalition (composed of Thai CSOs working in both human rights and the environment). Although the CSO Coalition itself was not a cross-sector table, it created a space for CSOs to work in partnership with both each other and other sectors. Over the 10 years, the Coalition members were supported by INGOs to develop research skills and generate their own research to supplement other analyses of the progress of change in Thailand, worked directly with Thai suppliers to improve their practices, and served as a watchdog for both the STF and Thai government agencies.⁵⁰

In addition to these ongoing collaborative spaces, many different cross-sector partnerships came and went throughout the 10 years. Several **global seafood companies and Thai suppliers partnered directly with both INGOs and Thai CSOs**, including to audit their Thai supply chains, to surface grievances and improve working conditions in their Thailand supply chains, to deliver health and safety trainings to workers, to enhance migrant worker participation in welfare committees and ethical recruitment practices, to pilot connectivity at sea projects, to launch hotlines for workers to lodge complaints, and more.⁵¹

Over time, the **partnerships between the private sectors and INGOs/CSOs appear to have strengthened, becoming more authentic and transparent.**⁵² CSOs reported that businesses increased their outreach and requests for support during the COVID period in particular.⁵³ INGOs and CSOs have provided necessary expertise and services, assisting the businesses in making progress on their public commitments and responding to the requirements international retailers/supermarkets have placed on them. INGOs/CSOs were seen as both increasing the integrity of changes in the private sector while also enabling businesses to improve their reputations through these partnerships.⁵⁴

In some cases, businesses paid for the INGO/CSO involvement, and stakeholders saw more risks in this model of “whitewashing” business practices; in other cases, philanthropic dollars paid for the INGO/CSO involvement, and the partnerships focused more on bringing the knowledge, skills, and credibility of the INGO or CSO to the business in order to improve their practices. However, regardless of payment source, stakeholders report that INGOs and CSOs have little genuine power in these relationships. Additionally, the sustainability of the partnerships between INGOs/CSOs and the private sector remains questionable, as many rely heavily on external funding and crisis-driven corporate interest.⁵⁵

The **Thai government also actively partnered with CSOs, INGOs, and private sector organizations** to develop its policies, implement policies, and maintain transparency and accountability. Early in the development of policies, the Thai government began inviting CSOs and INGOs to work with them to develop policies. For example, the

government worked closely with EJF on overhauling its fishery legislation and later with OceanMind and the STF to build and improve the government's monitoring, control, and surveillance of the Thai fishing fleet using a Vessel Monitoring System (VMS) system.⁵⁶ Local CSOs also provided services, working directly with government officials to conduct worker interviews, monitor inspections, provide shelter services to workers, and hold meetings where workers can raise issues with government officials, among other services and actions.⁵⁷

Levels of government engagement varied significantly over the 10 years and across departments and levels of government, with some officials embracing collaboration while others resisted or restricted it. Stakeholders report that invitations to participate in government meetings and activities were often selective, and CSO involvement could be curtailed if their findings threatened official narratives. At provincial levels, government agencies typically did not proactively engage with NGOs, leaving local CSOs to initiate relationship-building efforts.⁵⁸

While collaboration became common, it wasn't always seamless or beneficial. Initially, civil society groups were often sidelined or even described as "radicals."⁵⁹ Some STF working groups were "quite top down," where meaningful INGO participation was slow to happen.⁶⁰ Specific collaborations created more challenges than benefits, including notable failures in collaboration between INGOs and CSOs, with lasting damage to relationships due to ideological differences, poaching staff (from CSOs to international organizations), duplicating each other's services, and competition over limited resources.⁶¹

Partnerships between INGOs and CSOs with government and industry also **made it more difficult for the INGOs and CSOs to perform their watchdog role** and openly criticize government or industry progress.⁶² Even with encouragement to partner coming from the Prime Minister, some government officials were also initially reluctant to work with INGOs and CSOs, fearing media leaks, while others pushed hard for their engagement.⁶³

“It's difficult. The higher ups don't like the NGOs because they will give information to news and other media. They would meet, but not work together. [That] changed, where we were really working together to show [INGOs/CSOs] that we didn't have a hidden agenda, didn't have anything to cover. We worked with many INGOs, not just on fishing, but human rights as well.”

Government interviewee

A fundamental limitation of these many types of cross-sector collaborations was the **absence of a genuine migrant worker voice and participation** in decision-making processes. Legal restrictions on migrant worker collective organization meant that the most affected stakeholders remained excluded from shaping the reforms designed to protect them.

Overall, cross-sector collaboration was frequent. They sometimes created barriers, often moved slowly, and yet were persistently present and central to the processes of reform. Many of the changes that emerged over the past 10 years came directly or indirectly from these collaborative spaces and projects. The impact of these changes can be understood to be mixed, in part due to the variability in the equality, transparency, depth, worker voice, and sustainability of the collaborations and the risk that they interfered at times with the watchdog roles taken on by INGOs and Thai CSOs.⁶⁴

Condition for Change 6: Market dynamics underlie both the problem and the solutions

Market Dynamics as a Driver and Barrier to Meaningful Change

The issue of vulnerable migrant workers in Thailand being enslaved and in forced labor is a market-driven problem, where **global demand for cheap seafood at scale**, combined with low levels of accountability for how the seafood is sourced, created a powerful market incentive for both government and industry to engage in or ignore exploitative practices.⁶⁵ **Media reports, public research reports, and interviewees in this study consistently highlighted predatory business models and price pressures within the system.**

The **drive for competitive pricing**, often led by the large supermarkets and retailers in export markets like the U.S. and Europe, resulted in the Thai suppliers facing a tension of keeping prices low while still meeting high standards.⁶⁶ The issue of pricing remained a problem throughout the 10 years, with continued concerns that prices remain too

low for suppliers to meet demands and suppliers who do meet demands being unable to increase prices to reflect their improved supply chains.⁶⁷ **Pushing social compliance initiatives onto suppliers and increasing production costs while sourcing decisions based on the cheapest price is incompatible with eliminating forced labor and human trafficking in the supply chain.**⁶⁸

Other market dynamics contributed to the problem, including the labor shortage in Thailand, lack of interest by Thai workers to take jobs on vessels (and expectations for higher wages) leading to an increased demand for low-cost migrant labor, the unregulated broker system that dominated migration, and the semi-legal preprocessing industry in shrimp that responded to the needs of large factories, among others.⁶⁹ Market dynamics also affected export and domestic supply chains differently. Domestic seafood markets were less subject to international pressure, meaning exploitative practices often persisted more openly in domestic supply chains. In contrast, **international retailers sometimes responded by diversifying supply away from Thailand rather than investing in deep supply chain reforms.**⁷⁰

Variations in Markets – Shrimp and Tuna

The market dynamics show up in distinct ways in the two parts of the Thai seafood industry: shrimp and tuna. The two industries function quite differently in Thailand, and early on, much of the press coverage and initial action was more focused on the shrimp industry. Though many of the legal reforms affected both industries, some were more targeted to one than the other, and the private sector actions were quite specific to either the shrimp or tuna supply chains.

The shrimp supply chain includes vessels that catch trash fish (used as feed), shrimp farms, and processing facilities, which historically also included informal peeling sheds. The industry faced multiple pressure points during the 10 years, including a widespread disease outbreak starting around 2011-2012 that led shrimp buyers to seek other markets (and particularly led to increased purchasing from India instead of Thailand) and a loss of the EU's Generalized System of Preferences (GSP) and resulting increase in tariffs. This loss of the GSP was unrelated to the fishing industry specifically, and instead was driven by changes in the EU's laws and affected many Thai products.⁷¹ Consequently, before the forced labor, human trafficking, and sustainable fishing reforms began in mid-2014, the industry had already seen a significant decline, having lost approximately half of its exports.

By 2016, however, it began to recover part of this market share. It also experienced a change in its market, with international demand decreasing even as domestic demand increased. Consequently, Thai shrimp production and purchasing (once it stabilized around 2016), if you combine export and the domestic market, has remained relatively steady.⁷² As another measure of Thailand's position in the world on shrimp exports, by the end of 2024, Thailand's volume of exports was less than 20% of the regional leader in exporting (India).⁷³ In contrast, in 2013, it had been the leading exporter not just in the region, but in the world.⁷⁴

Regardless of the reasons for shifts in shrimp purchasing, **the decrease in exports has consequences for the process of reform.** As a Thai supplier in the discussion group explained:⁷⁵

“*Thailand is no longer a top competitor in the global shrimp industry. Buyers now purchase from countries like India and Ecuador. We used to be ranked number one, but now we're not even in the top five. This shift makes it very difficult for us to engage with farmers. Since we're not selling as much as before, we don't have the leverage to go and tell farmers what needs to change. Even though change is necessary, we can't demand it from them when the market itself is shrinking.*”

Thai supplier interviewee

The tuna industry in Thailand has market dynamics and opportunities for reform that look quite different from the shrimp industry. Much of the tuna product is sourced from non-Thai vessels and vessels fishing in distant waters, unlike the shrimp feed that is sourced more locally. However, Thailand is one of the world's largest processors of tuna, particularly canned tuna, making the processing infrastructure in Thailand a critical part of an overall regional supply chain. This has implications for how specific solutions are deployed and the extent to which reforms that focus on a single country can meaningfully affect the overall dynamics of the supply chain.⁷⁶

Similar to shrimp, Thailand's processed tuna export levels changed during the 10 years and the changes were driven

by multiple factors including periods of raw materials being cheaper, variability in supply levels partly affected by adoption of practices to address IUU, falling prices for canned and frozen tuna, the change in the EU GSP status for Thailand, and ebbs and flows in demand worldwide. In 2015-2017, Thailand saw a decline in exports, with the 2017 decline attributed explicitly to declining demand in emerging markets.⁷⁷ This trend started to turn around by 2018, in part due to increasing sales to the Asia/Pacific and Middle East markets⁷⁸, and surged during COVID, particularly to the U.S. market.⁷⁹ Demand worldwide decreased again after COVID, seeing an overall trend of a slower market, and Thailand experienced a decline in exports again.⁸⁰ In the final year of this study, 2024, the decline continued overall in the world market. While the amount of sales is an important measure of the success of the industry, another is the position of Thailand compared to other producing countries. As of 2024, Thailand remained the top exporter of canned and processed tuna worldwide by a significant margin.⁸¹

Through the end of 2024, trade in a variety of fish products was on the decline worldwide, driven by decreasing demand in the U.S. and EU. Despite this, Thailand's overall exports of fish and aquaculture products, which include both shrimp and tuna, have returned to the same levels as 2016, with an ebb and flow throughout the eight years.⁸²

Market Dynamics as a Motivator for Change

While the market-based nature of the problem and market dynamics as a barrier to change existed throughout the 10 years, it is equally true that **market dynamics contributed to the willingness to act by the Thai government, Thai suppliers, and international retailers/supermarkets**. These sectors responded to the market risks presented by the EU yellow card and threat of trade sanctions and, to a lesser extent, the U.S. State Department's TIP downgrade.⁸³ They also responded to the reputational concerns and legal risks created by the forced labor and human trafficking crisis, both threats to the bottom line of Thai suppliers and international retailers/supermarkets.⁸⁴ This awareness of market risk continued through 2024, with major exporters and their associations in Thailand advocating for the continuation of the reforms, even as others sought their rollback.⁸⁵

Many solutions implemented over the last 10 years utilize market-based leverage to advance change. Brands and retailers use their leverage over businesses in their supply chain to demand changes. This has led to innovations in the supply chain and examples of practices that could be adopted more widely, even in the early years of reform.⁸⁶

Market Self-Regulation as a Core Part of the Change Process

Market self-regulation (also called private governance and voluntary non-governmental governance) was a central part of the reform process, though often complex and contentious. Market self-regulation refers to the efforts by private sector actors such as international retailers and Thai suppliers, as well as industry associations, to establish and enforce their own standards, codes of conduct, monitoring mechanisms, and practice changes. These changes are often in response to external pressures from the media, consumers, and market risks and shifts, without or prior to direct government action. Some self-regulation is also in response to weak but legally binding government requirements that business then implements using their own self-regulation practices.⁸⁷

Self-regulation efforts over the last 10 years included such things as:

- **Codes of conduct or self-imposed standards:** Many companies developed their own ethical standards, codes of conduct, and guidelines for their supply chains. The STF also developed codes of conduct that members adopted.⁸⁸
- **Certification schemes and audits:** These consumer-facing labeling certifications have been used to indicate best practices from fishing to aquaculture to processing. One widely referenced is the Marine Stewardship Council (MSC)'s ecolabel.⁸⁹ The ILO Good Labour Practices (GLP) program also developed voluntary compliance and good practice guidelines.⁹⁰
- **Supply chain mapping and traceability systems:** Although initially there was significant pushback on whether supply chains can be mapped, over time, many private businesses invested in mapping their supply chains, from larger suppliers down to small shrimp farmers. The STF supported this change through a track and trace system for shrimp feed and supporting vessel monitoring, control and surveillance.⁹¹

The STF served as both a place of learning for private sector partners who otherwise had limited knowledge of labor rights issues, fisheries management, or even maritime laws,⁹² **as well as a space for self-regulation by the industry**, including the development of codes of conduct (labor and environmental), audit practices, and commitments to traceability, among other actions.⁹³ This role as a space where reforms are identified and acted upon has continued steadily over the last 10 years, with continued progress as of 2024, such as the Tuna Audit Framework

more recently released.⁹⁴ The Thai business associations similarly took on a self-regulation role, asking members to adopt specific practices, including the ILO's GLP. Generally, evidence suggests that processing businesses were willing to work on these changes, particularly those that depended on an export market.⁹⁵

Market self-regulation has been an important part of how change occurred, and **the willingness of the private sector entities to undertake self-regulation was a core condition underlying many shifts in the system.** Self-regulation allowed the industry to respond to market and reputational risks even where government regulation was weak. Self-regulation actions also led to partnerships between government and private sector entities (e.g., the STF's work with the Thai government to implement a vessel monitoring system), partnerships between INGOs and CSOs with private companies, and increasing transparency globally regarding the nature of the seafood supply chain.⁹⁶

However, similar to the other market dynamics discussed here, self-regulation also has significant challenges and limits. Research in other industries suggests that these types of self-compliance standards have little to no impact on workers.⁹⁷ Here, the impact is less clear. Compliance with the standards can be hard to document. For example, the STF was critiqued by external stakeholders for its lack of transparency related to how businesses implemented its early codes of conduct.⁹⁸ The impact of other self-regulation practices, like the MSC, is also widely criticized for failing to surface human rights violations even as sustainability practices are more accurately assessed. Perhaps most damning, even when the practices are fully implemented, many stakeholders report they are primarily about protecting the business risks rather than meaningfully improving outcomes for workers. In addition, when businesses implement these risk-reduction changes, they can benefit from decreased external pressure.⁹⁹ Underlying all these challenges is **the market incentive not to implement fully because the cost burden on suppliers down the supply chain, when combined with pricing by international retailers not reflecting these costs, incentivizes deception and inadequate implementation of requirements.** Similarly, the movement of international retailers to purchase from other countries helps maintain low costs.¹⁰⁰

An additional critique of self-regulation practices by stakeholders reflecting on 10 years of change in Thailand and in the global supply chain includes the near absence of worker voices in developing or implementing practices, and at times, practices that some call "performative," like worker welfare committees instead of structures that enable workers to engage in collective bargaining with employers.¹⁰¹

Condition for Change 7: Key historical, cultural, and political dynamics in Thailand remained constant

Systemic change is always grounded in history – dynamics that began long before the system changes were incited and continued throughout the process of change. This is true in the Thai seafood and fishing reforms as well. In Thailand, some of the persistent social, cultural, and political dynamics have deeply affected both the nature of the problem, the solutions advanced, and perhaps most importantly, when, how, and to what extent the solutions are fully implemented.

Xenophobia and Anti-Migrant Sentiment: Not unlike many other countries, Thailand has a deeply ingrained cultural dynamic of anti-migrant sentiment, which significantly impacts migrant workers, particularly those from Myanmar. This prejudice (referred to as xenophobia by many stakeholders interviewed) is rooted in historical animosities and manifests in various discriminatory policies and practices.¹⁰² Migrant workers often do not receive equal treatment in terms of wages, working conditions, access to public services, and more. This remains true despite the Thai economy's dependency on migrant workers' labor.¹⁰³

Anti-migrant and particularly anti-Burmese sentiment was a thread woven throughout the 10-year story of change, becoming more intense during the period of 2020-2022 as both COVID and the Myanmar coup led to increasing tensions in Thailand between Thai citizens and migrants. This dynamic of a "two tier society that is fully ingrained"¹⁰⁴ can be seen in the laws that protect the freedom to organize for Thai nationals, but not for migrants, and in the willingness to implement policy changes designed to protect migrant workers.¹⁰⁵ As noted by Human Rights Watch, officials in government, including senior military and police officials, have publicly spoken out against migrants, and these are the very same people in government who played critical roles in the implementation of the revised policy framework that was meant to protect migrant workers in the fishing and seafood industries.

As explained by CSO leaders in a discussion group:

“ *Because of the history of Thailand and its neighbors (one kingdom defeating another, especially Burma defeating Ayutthaya; and Siam defeating the Khmer), which is taught in the curriculum of Thai schools, Thais believe and are taught that the Burmese are paying off their karma for burning down Ayutthaya ...This is an underlying attitude (and narrative) that affects various facets of migrant worker policy and treatment to this day.* ”

CSO discussion group participant

Beyond this anti-migrant sentiment, Thai social hierarchies and hierarchies among migrant workers themselves more generally also influence opportunities for workers to challenge authority and seek remedies, including hierarchies based on age, class, gender, seniority, legal status, and ethnicity.¹⁰⁶

Fundamental Barriers to Worker Collective Action: Although worker voice was widely accepted as a necessary solution, migrant worker organizing and collective action in Thailand are hindered by laws that prohibit migrant workers from forming independent unions and engaging in collective bargaining. These laws relate back to the xenophobia and devaluing of migrant workers. Multiple attempts to change the laws have failed. There are pathways to collective action, such as non-unionized bargaining units. Still, they are far more limited and tied to a specific set of demands from an employer rather than an ongoing structure.¹⁰⁷

Corruption: Corruption in Thailand is a long-running concern, with the country now ranked number 107 out of 176 countries on Transparency International's 2024 Corruption Perceptions Index (indicating 106 countries are less corrupt than Thailand).¹⁰⁸ Some government officials – from local police to military and immigration officials – have been directly involved in facilitating trafficking, profiting from bribes and extortion of workers. These practices have continued to this day, including evidence that local police have purposefully withheld information from prosecutors to protect traffickers and have threatened witnesses.¹⁰⁹ The problem is not just at the implementation level. Government workers have reported that corruption is a top-down problem, with corrupt high-level officials shaping how laws are designed and implemented.¹¹⁰ Corruption related to trafficking and forced labor is also largely left unpunished, even when identified. In 2023, despite 35 new investigations the previous year and another 20 in 2023, the Thai courts did not report any convictions or sentencing.¹¹¹

Thai CSO partners report that corruption is particularly prevalent in relation to migrant worker registration and regularization. For example:¹¹²

“ *[The policy on migrant worker registration] mainly has enriched officials through corruption, never benefited migrant workers and is based on short-term policies that ensure the process has to be repeated over and over again, ensuring an income stream to the corrupt.* ”

CSO discussion group participant

The impact of corruption is compounded by anti-migrant sentiment in other ways as well, such as the impact on enforcement discrimination, where migrant workers may be arrested for documentation issues or mismatched work permits while their employers and brokers – the primary responsible parties – rarely face action.¹¹³

Government Instability: The Thai government was in a state of instability with a deep divide between factions and political deadlock, leading up to the coup in 2014 by the military and specifically General Prayuth Chan-o-cha. While the military government was able to advance change rapidly, the underlying government dynamics remained and affected the implementation and sustainability of the changes.¹¹⁴

Xenophobia, barriers to collective bargaining, corruption, and government instability have collectively hindered progress and now contribute to the risk of backsliding, creating an environment ripe for the problem to persist and for reforms to be rescinded or fail to be implemented.



Section 2: Processes of Change

Photo: © Stride, Josh/Humanity United. Fish sorting at port in Thailand. 2016.

The 10 years of change in the Thai seafood and fishing system can be understood as a set of overall change processes, with many nuanced and specific changes within them. Where the conditions of change created a foundation that helps us understand why change was possible, the processes of change explain how change happened.

The early, bold actions (Process of Change A) is the only process that is time bound, occurring in the first five years of the story only. The remaining processes of change represent patterns that ebb and flow, have moments of big impact and others of smaller impacts, and can be seen in how change happened across sectors and time periods. Some of these patterns enabled efforts to decrease forced labor and human trafficking, while others sometimes enabled and sometimes limited efforts.

Process of Change A: Bold and dramatic early actions transformed the system

The Thai seafood industry experienced abrupt and dramatic systemic changes in 2014-2016, along with more traditional incremental change over time. This dramatic moment of change was possible in part because of the ability of key actors to make decisions and act unilaterally, as compared to a more multi-stakeholder or democratic process.

External Pressures: Some of these actors put rapid pressure on the system, with bursts of bold activity:

- Actions by the media (the storm of coverage), particularly in 2014;
- The TIP downgrade by the U.S. in 2014; and
- The EU issuance of a yellow card in 2015.

Private Sector: Some private sector actors responded rapidly and without waiting for broader industry consensus, Thai government requirements, or other directives, including:

- Specific businesses that had the capacity and willingness to act rapidly became the industry's early adopters of reforms. For example, Thai Union acted quickly and in very public ways, responding to how their reputation was particularly harmed by the media attention given the dual damage of being called out and having "Thai" in its name, the country at the center of the media storm.¹¹⁵
- Other international retailers who rapidly acted to create a very visible space for industry-wide change in the form of the Seafood Task Force.

Thai government: The boldest and more important rapid actions were undertaken by the Thai government itself. Whether this "shock therapy" approach¹¹⁶ was beneficial or not, it was enabled by the unilateral power the government held at the time to facilitate rapid, top-down changes. Notably, it was seen by many stakeholders as both an important enabler and the cause of significant problems (in the short-term to vessel owners and businesses and in the long-term to the sustainability of the changes).¹¹⁷

To understand how the Thai government responded, additional historical context is needed. In 2014, the Thai government went from a democratic process to a military government led by one powerful individual. During the democratic regime prior to the coup, multiple attempts had been made to change seafood and fishing laws, recognizing the media coverage was beginning and pressure had already started from the EU. Yet, efforts failed to make it through the parliamentary process before elections disrupted the reforms.¹¹⁸

With the entrance of the military government in May 2014, this dynamic shifted. Now, the government could act rapidly on issues that the previous government had been unable to resolve (including and beyond seafood and fishing issues), and act with minimal buy-in across stakeholder groups.¹¹⁹ The **government could implement radical policy changes** and enforce new laws and regulations quickly, "without a sense of dependency or obligation to the fishing industry," allowing for dramatic shifts.¹²⁰ There is some conflicting evidence on whether or not the government was responding to businesses (e.g., they may have been directly responding to pressure from large Thai corporations with international reach),¹²¹ but the evidence is clear that they were not responding to the needs or demands of the fishing industry directly.¹²²

This process of rapid change is not a fundamental condition underlying how change happened in the system because it did not sustain. **Overall, where democratic or multi-stakeholder agreement processes existed, the work moved much more slowly, even in the first couple of years of reforms.** Over time, there was a shift, where actions taken across sectors were less rapid, less unilateral and the slower, multi-stakeholder and collaborative action processes advanced change more steadily. This was seen in the difference between how the STF advanced work over the long-term vs. key retailers and suppliers that moved quickly on their own or with INGO and Thai CSO partnerships. It was also seen in the military government vs. elected governments before and after. Neither rapid change nor slow, incremental change is better overall, and multiple stakeholders flagged the speed at which change

occurred early on as problematic due to some reforms being poorly designed or implemented along with the lack of buy-in to the changes, which is now contributing to the risk of backsliding.¹²³

Process of Change B: Individual leaders shaped how change happened through personal and professional power

The change process in the Thai seafood industry from 2014-2024 was significantly shaped by a diverse group of influential leaders across various sectors, each contributing unique characteristics and leveraging different mechanisms to drive reforms. They included:

- **Leaders in international retailers and Thai suppliers:** Their influence stemmed from their companies' market power, particularly the leverage held by U.S. importers. These individual leaders were responding to market competitiveness and buyer expectations, reacting to external pressures like the EU yellow card, U.S. TIP Report, and media exposés to protect export capabilities and reputation. **They were also described as forceful personalities, with their personal style being a significant contributor to their influence over the system.** However, these individuals had significant influence on the industry's self-regulation and response to the many different pressures in part because they were in companies willing and able to act.¹²⁴ Additionally, the STF played an important role for some of these leaders, as it was both created by some of these leaders and also served as a platform for their leadership to have industry-wide influence.¹²⁵
- **Leaders in the Thai government:** A couple of key individuals were repeatedly named for their critical leadership roles in influencing the extent and nature of change within the Thai government. Their influence was rooted in their formal authority to enact and enforce laws and policies, their access to and credibility with Prime Minister Prayut and other leaders at the top of the government structure, and their ability to understand both Thai culture and Western cultures, bridging between different actors and interests. Absent these two individuals, study participants suggest the changes would not have happened as dramatically or thoroughly as they did from 2014 to 2019.¹²⁶ Multiple interviewees even indicated that when their leadership ended, so too did the willingness of the Department of Fisheries and the government more broadly to continue reforms.¹²⁷
- **INGO and philanthropic leaders:** Only a few people were regularly named as highly influential from the broad network of INGOs and philanthropic leaders involved in the systemic changes. Some of the feedback on their involvement was positive, while other feedback heavily criticized their approach. Overall, these leaders leveraged financial resources and technical expertise to support research, advocacy, direct assistance to workers, and the design of some of the major reforms. **Their influence was partially the result of their own personal style, often from the stakeholders they represented or convened, and also driven by how they held others to account to maintain progress.** They were acknowledged for their systems-mindset, bringing a broad understanding of what was needed to drive change.¹²⁸
- **Thai CSO leaders:** Interviewees across all sectors rarely mentioned specific leaders in Thai CSOs or among workers as critical to how change happened. One person was named for influence very early in the process to help uncover the abuses happening. However, generally, when Thai CSO influence was mentioned, it was at the organizational level rather than calling out specific individuals whose leadership deeply affected how the system changed. This does not mean there was a lack of Thai CSO leadership; rather, individual leaders were not credited during interviews or discussion groups for the changes in the same way as leaders in other sectors.¹²⁹

Although other individuals were identified as crucial to the system, including those operating outside it and exerting pressure (e.g., media or advocacy organizations acting as disruptors), there was little description of their unique leadership role in influencing the system. They were recognized as part of the story without being described as having a unique, individual impact on how the story unfolded.

Overall, across the leaders named, some key characteristics are present:¹³⁰

- They have/had **strategic acumen and vision**, with a deep understanding of the complex, political nature of the problem and solutions.
- They are **systems thinkers** who surface and champion multi-prong, multi-sector solutions.
- They are **strong relationship builders** and networkers, building trust across sectors.

- They have **deep expertise** and bring their knowledge into how they approach change. Where they lack specialized knowledge, they seek it out.
- They have been persistent, **committing to change over many years** and navigating setbacks with patience.
- They are effective at leveraging external pressure to advance their goals.
- Many held roles within multiple sectors over the course of the 10 years or brought experience from another sector into their role during that period, including some switching between INGO and private sector jobs.

The main differences between these leaders in how they influenced change was their positional and resource power along with their overall approach to using power:¹³¹

- *Formal Authority:* Business and government leaders held authority over actions in the system.
- *Financial Resources:* Business, government, and philanthropic leaders could deploy financial resources to support change.
- *Convening Power:* The INGO leaders primarily held power through how they convened others and their information and expertise.
- *Collaborative vs. Top-Down:* Across sectors, some of the leaders favored collaborative approaches while others used top-down leadership or relied on “naming and shaming” power to influence change.

Finally, one of the clear signals of the importance of individual leaders was the **frequent mention of the decreased pace of positive change when leaders exited their positions and new individuals stepped into the same roles with the same positional power**. This was particularly true of government and private sector leaders. As of 2024, most of the leaders identified as critical in how change happened are no longer in their positions and their replacements were described as either problematic, creating barriers to continued reforms, or were not named at all, positive or negative.

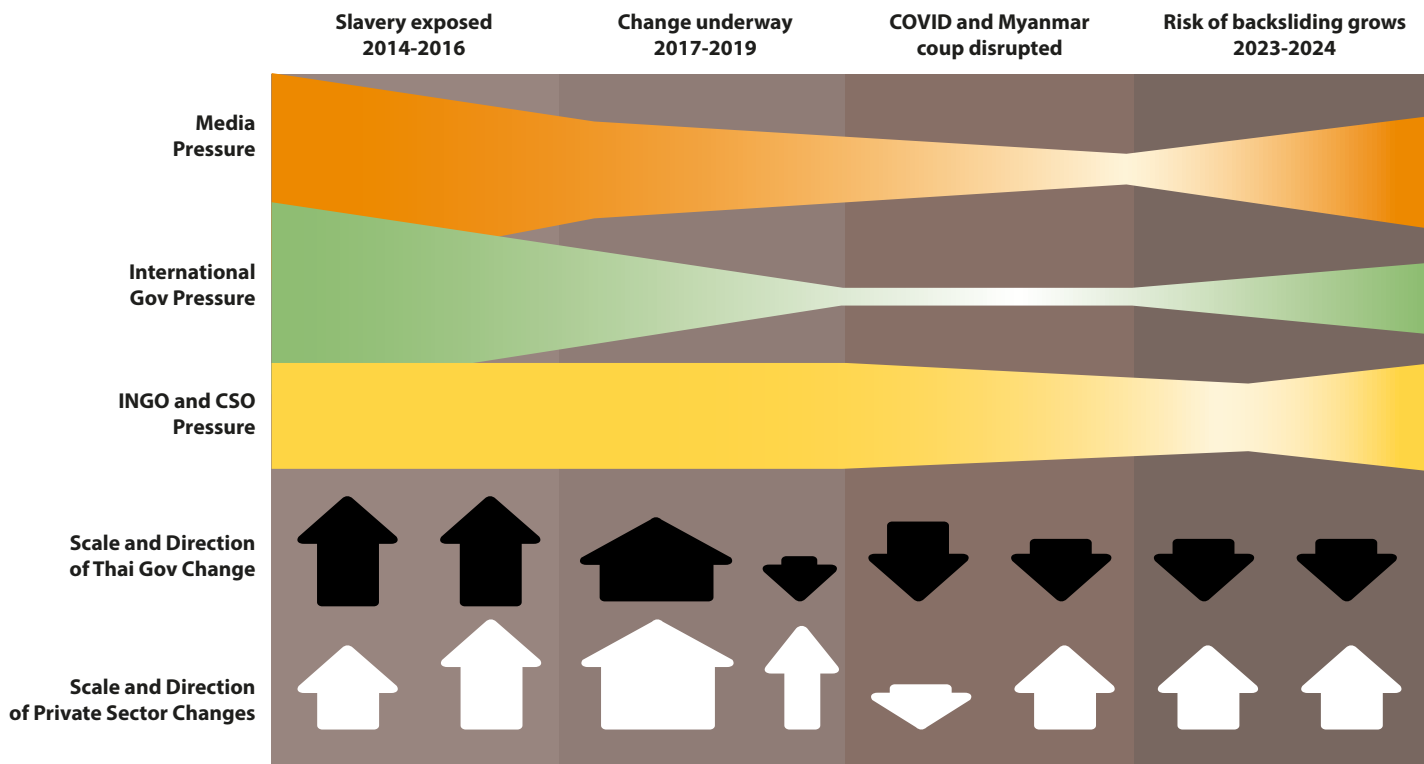


Photo: © Stride, Josh/Humanity United. Workers sorting seafood at port in Thailand. 2016.

Process of Change C: Change accelerated when pressure was high

The pressure for change and the speed and intensity of change were closely aligned throughout the 10 years (Figure 3). When multiple forms of external and internal pressure on the system were at their highest, many different actions were underway. When these forms of positive pressure to address forced labor and human trafficking decreased and new pressures replaced them, the system retreated from previous reforms. This pattern is the strongest as relates to the Thai government's reactions. **Although many stakeholders report that the INGO and CSO pressure was an important part of the overall story, the pattern of change suggests it was helpful, but not sufficient, to maintain pressure on the Thai government.**

Figure 3: A rough approximation of the patterns of pressure and change over time



The 2014 "Modern Slavery in Focus" articles in *The Guardian* and *New York Times* article "Slavery and the Shrimp on Your Plate" (2014) framed the issue as one of slavery, forced labor, and human trafficking.

The timeline analysis in Section 3 of the report will provide substantial detail on the ebb and flow of pressure.¹³² At a high level, changes followed a pattern:

- **When media pressure and international government pressure were high together, stakeholders reported rapid and significant change** in both the Thai government and the private sector. The quality of the changes was variable, with some more performative than others, but the changes were happening.
- When government pressure dropped off precipitously in 2019, with the TIP previously upgraded and then the yellow card being lifted, alongside less (though still ongoing) media pressure, the **pace of change was rapidly decreased in the Thai government, but the same abrupt drop-off did not occur in the private sector.**
- **COVID was a massive disruption**, with the government and private sector stakeholders turning their attention elsewhere briefly. Additionally, rapid changes by the Thai government and individual factories and vessels designed to respond to the COVID crisis directly undermined the welfare of workers. This was also a time of relatively little progress by international retailers.
- The **Myanmar coup** contributed to the internal disruption in the Thai government, along with the loss of political will. Little to no international pressure outside of INGOs and CSOs existed at this time. Yet, **international retailers and major Thai suppliers continued to progress**, with the adoption of new practices and commitments steadily throughout the remaining years of the story.

- In the final two years, **some increases in media and international government pressure have occurred (Table 2)**, but despite this, the Thai government is considering and adopting reforms that decrease the safety and welfare of migrant workers in the seafood and fishing industries. As of the end of the timeline analyzed (2024), it is unclear whether a steady increase in external pressure will occur and whether it will shift the behaviors of the Thai government. However, during this time, much of the private sector has continued its reforms and is even advocating for the Thai government not to recalibrate in ways that prioritize the needs of industry over workers.

Table 2. The ebb and flow of media and international government pressure on the Thai seafood and fishing industries

Sources of Pressure	2014-2016	2017-2019	2020-2022	2023-2024
Media	High pressure through media exposés revealing forced labor and human trafficking. Coverage continues through many outlets throughout this time period. ¹³³	Decreased global visibility with fewer stories, though The Guardian's series continues ¹³⁴ Some pressure due to the Ghost Fleet documentary and the start of Outlaw Ocean Project. ¹³⁵	Continuation of the Outlaw Ocean Project and some international coverage of the Ghost Fleet documentary, ¹³⁶ but little other coverage of Thai's seafood industry.	International and local media attention returns to the issues of Thailand's seafood industry as rollbacks are at risk. ¹³⁷
International governments	High pressure creating significant market risk, including through TIP downgrade and, more importantly, yellow card from EU. ¹³⁸ Sustained pressure through U.S. and EU involvement in change efforts and creation of ILO Ship to Shore project. ¹³⁹	Continued pressure early on from the EU, U.S., and ILO. ¹⁴⁰ Pressure starts to drop, first with TIP upgrade and then in 2019 with the yellow card removed. ¹⁴¹ Some continued pressure due to GSP trade preferences being suspended by the U.S. ¹⁴²	Mostly a lack of pressure, including the ILO Ship to Shore project shifting to regional focus. ¹⁴³	Some pressure, particularly through EU adoption of CSDDD ¹⁴⁴ and fishmeal going on DOL's list of goods. ¹⁴⁵

In addition to the overall pressures outside the public and private systems to address the issue, private sector actors and the Thai government placed pressure from within the system on each other and on migrant workers.

The **Thai government put rapid and highly disruptive pressure on vessel owners**, with a dramatic set of pressures early in the story, tapering off by 2019, and largely not starting back up. This early pressure put many vessels (estimated at over 3,000) out of business and penalized others for failing to comply with new regulations fully. It also put pressure on the distant water fleets to operate from Thailand due to the 30-day limit.¹⁴⁶

The **Thai government put pressure on migrant workers directly** at times, with some policies designed to enable their migration and access to work, while others intentionally or unintentionally disrupted their safe migration and access to work. This led to an ebb and flow in the availability of migrant workers. The first big example of this came in 2017 with the adoption of a new ordinance that had harsh penalties for irregular workers and their employers (ultimately, enforcement was delayed to address the impact).¹⁴⁷ Another moment led to the exodus of an estimated 300,000 migrant workers in 2020 when the laws changed, borders closed and they lost their legal status and ability to renew it.¹⁴⁸

International retailers put pressure on Thai businesses throughout their supply chains, issuing requirements related to traceability, grievance mechanisms, recruitment fees, and other reforms, while essentially not shifting the pricing structure to reflect these changes. This type of pressure was not always successful, however, particularly when the new requirements proved difficult or expensive to implement.¹⁴⁹ This type of pressure on Thai suppliers depended on continued commitment to purchasing from Thailand. When buyers moved their purchasing to other countries, the pressure on Thai businesses decreased. This type of pressure was also most successful when the business was directly exporting to an international market,¹⁵⁰ which resulted in less pressure on fishing vessels that were structurally more steps removed in the supply chain from the international market.

Large Thai suppliers also passed the requirements down through their supply chains. As explained by multiple Thai suppliers who participated in the business discussion group in Thailand:¹⁵¹

“ We also made an agreement among companies: If a farmer cannot comply with the required standards, they will sell their shrimp to another company. And if we find out, we will not buy from them again. We know this is a tough adjustment, but we need to work closely with farmers to help them comply with the standards – not just for compliance’s sake, but for the sustainability of the whole supply chain. ”

Thai supplier/association discussion group participant

“ We need to clearly communicate to farmers that the EU is watching, and traceability is critically important. We must be able to track and verify the product at every stage. ”

Thai supplier/association discussion group participant

This pressure appears to be the primary mechanism by which processing plants changed (in response to the demands of their export market), though the change in Thai policies also influenced them, particularly related to the recruitment of workers.¹⁵²

There is evidence to suggest that workers who were supported to organize by Thai CSOs were able to put **pressure on their direct employers**.¹⁵³ While organizing in Thailand has not reached a level where proactive collective bargaining prevents harms in places of employment due to the Thai legal restrictions on migrant workers organizing (the Labour Relations Act of 1975 (B.E. 2518)), reactive pressure when workers experience harms and get support to organize in response is frequent. Workers who participated in focus groups discussed numerous examples, and reports on organizing from 2014 through 2024 also present a wide variety of examples.¹⁵⁴

CSOs put pressure on the system through supporting this type of organizing and also through training workers on their legal rights and supporting them to file complaints and participate in the legal processes available through the Thai government.¹⁵⁵ Again, this type of pressure is reactive, responding to harms that have already been caused. It can and did create visibility (including through international media attention) and ongoing pressure on the government to continue reforms. INGO leaders outside of Thailand reported, however, that this type of continuing litigation was insufficient to drive the needed changes and potentially used too heavily by CSOs compared to other strategies they could have deployed.¹⁵⁶

Workers, with support from CSOs like MWRN/LRF, gained knowledge of their rights and effectively utilized government mechanisms to seek assistance including through the courts, which in some cases led to changes in government agency practices and improved access to remedies. The continuous feedback from CSOs and workers helped maintain pressure and accountability.

Pressure through evidence: CSOs and INGOs played a crucial role in generating evidence that other actors could use to exert pressure on various parts of the system. The early media investigations used this evidence along with the investigative journalism they conducted. INGOs like EIJ used their investigative reports for “evidence-based advocacy” to influence governments and the private sector. Civil society organizations played a crucial role in documenting abuses and providing evidence for the media and international bodies.¹⁵⁷

Process of Change D: Philanthropic resources were strategically, directly and dynamically deployed

Philanthropic organizations played a pivotal role in driving change within Thailand’s seafood and fishing industry over the past decade. Their influence has spanned investigative journalism, civil society strengthening, government advocacy, and private sector engagement, often **operating as crucial catalysts for change in a complex system** marked by deep-seated labor exploitation and environmental degradation.

Philanthropic actors also played active roles as stakeholders in the system, including Humanity United and Freedom Fund’s strategy that included functioning as “systems convenors” who worked with, supported, and held accountable key stakeholders throughout the multiple sectors within Thailand and globally. A systems convenor is a crucial leader who facilitates collaboration and learning across many different individuals, organizations and even sectors to address complex problems. Staff from these organizations were described as such, including how they showed up with credibility and legitimacy. Study participants regularly cited this role as a driver of change.

Their approach of embedding in the systems change work and how the program directors showed up in the work was regularly cited by study participants as a driver of change.¹⁵⁸

Although one could argue that philanthropy's investment in the system was a condition for change, this analysis found it functioned more as a process by which change happened due to its intentional targeting of resources, strategic and often short-term investments, and clear expectations about how change should happen. In other words, **philanthropy's influence on how change happened was not primarily due to increased funding for the issue, but rather the strategic and systems-focused deployment of funding.**

The consistency of interest by international philanthropy was critical, and the ways in which philanthropy prioritized certain types of actions over others clearly influenced changes in the system at distinct points in time. It is important to note that the EU and ILO also contributed influential funding (e.g., through the ILO's Ship to Shore project) to change efforts along with other international governments. Most of the advocacy funding over the 10 years of change came from philanthropic sources, however.¹⁵⁹

The visibility of the issues in Thailand in the years leading up to the 2014 media storm coincided with a **broader trend in philanthropy to prioritize work on "modern slavery," forced labor, and human trafficking.**¹⁶⁰ INGOs were aware of this interest and were already building their capacity to work on the issues, including environmental INGOs that saw the intersection of human rights and sustainability issues.¹⁶¹

When international philanthropy began to target work in Thailand specifically, they brought in their **mental models about how change should happen** (deeply held beliefs, assumptions, and ways of seeing the world that influence how people perceive problems and what they believe is possible for change). These included supporting local actors in taking ownership of solving the problem. This on-the-ground support (particularly from the Humanity United and Freedom Fund Hotspot) included a mix of freedom to move the work forward in ways Thai CSOs already knew how to do (legal advocacy, welfare support to workers, the rescue work that many CSOs took on)¹⁶² and expectations about what it would mean to do the work in more influential ways. Increased Thai and INGO collaboration was prioritized by international funders and INGOs they funded, leading to structures like the CSO Coalition and resources and direction to Thai CSOs to expand from project implementation, worker engagement and worker services to more robust research, increased advocacy with the government, and participation in larger cross-sector dialogues.¹⁶³

In the years before COVID, a **new philanthropic mental model** was introduced, with increased interest in worker-driven organizing as a pathway to durable systemic change. As this mental model was brought to the work, **Western models of organizing** were sometimes prioritized and experimented with in Thailand by organizations not funded by philanthropic organizations even as Thai CSOs also continued and expanded their own model of organizing, where CSOs partnered with workers to advance change. Thai CSO and INGO stakeholders discussed how pressure to utilize the western models at the same time as their funders were prioritizing investments in worker voice was, at times, disruptive to organizing that had long been present in Thailand in other ways. Western models also bumped up against Thailand's legal constraints on migrant-led organizing and collective bargaining.¹⁶⁴ There is some evidence to suggest that expectations imposed by international philanthropy also led to conflicting priorities within organizations, particularly those seeking to be led by or responsive to the needs of migrant workers.¹⁶⁵

The Freedom Fund and Humanity United also **prioritized institutional capacity building for Thai CSOs**, including financial management and safeguarding policies, though this priority began a few years into the Hotspot. While the institution building efforts had mixed success overall, they did help address some issues (e.g., establishing safeguarding policies in some CSOs). Additionally, they communicated expectations to CSOs in Thailand regarding the level of institutional infrastructure that international philanthropies expect. The organizations supported in the Freedom Fund and Humanity United Hotspot model benefited from this type of technical assistance and, through expanded funding, were able to develop new programs in regions they previously had not reached.¹⁶⁶

Multiple philanthropic organizations brought in **a mental model that a global supply chain problem like forced labor and human trafficking needed to be solved through market-based approaches** (or at least, this was a necessary part of the solution). With this in mind, philanthropic dollars flowed to self-regulation efforts like the Seafood Task Force, supporting specific projects designed to strengthen the Task Force itself and interventions in the global supply system (e.g., the vessel monitoring systems and supply chain mapping).¹⁶⁷ Philanthropic dollars also supported specific solution sets, including ethical recruitment, supply chain transparency, due diligence, and worker grievance mechanisms.¹⁶⁸

Philanthropic dollars also supported **targeted, point-in-time assessments** designed to put pressure on specific points in the system. Two of these pressure points were called out as critically important. The first was the funding of investigative journalism early in the changes¹⁶⁹ and the concurrent funding of the EJP report, "Thailand's Seafood

Slaves.”¹⁷⁰ The second was the funding of the Praxis Labs report in 2019, which combined worker data with an intense focus on the private sector reforms, including, but not limited to, the Seafood Task Force. Multiple interviewees identified this report as a critical moment of pressure that led to reforms in the system, particularly for the STF and its members.¹⁷¹

The **shift to regionalization** made by two critical philanthropic partners in 2020 (shortly before the Seafood Task Force and the ILO Ship to Shore project also made this shift) influenced the system, beginning the process of shifting resources from Thailand’s on-the-ground CSOs to new Hotspot programs in other countries and regional strategies. The shift was done with care for the impact on the CSOs, but many interviewees also acknowledged that it would inevitably lead to decreases in collaboration and capacity within Thailand, highlighting the complex issues associated with sustaining increases in capacity when international philanthropy has been responsible for initially resourcing it.¹⁷²

Some interviews and discussion groups revealed that **funding practices across different philanthropic institutions created problematic dynamics**, where the strategic intent of one funder interfered with or created additional challenges for another. Some funders approached the change more comprehensively, while others had narrow focus areas, leading to fragmentation.¹⁷³ The proliferation of organizations, recommendations, and proposed solutions made it difficult for some private sector leaders to determine which reforms to undertake.¹⁷⁴

This combination of funding (1) to the private sector to directly influence reforms; (2) to INGOs and others to put pressure on the system at key points in time; (3) to CSOs to have increased collaboration, greater government and private sector advocacy and partnership roles, and more Western models of worker organizing; and (4) that shifted to a regional approach all influenced how change happened in Thailand and the global supply chain. The support demonstrably contributed to improvements and changes over time, directing change efforts at multiple key points.

Process of Change E: Implementation of reforms was incomplete, inconsistent, and under-resourced

While significant legal and policy frameworks were rapidly introduced in Thailand, particularly in response to external pressure, their translation into consistent, effective, and sustained practices on the ground was problematic. There is some variation over time and by sector in how fully implementation was undertaken, but the overall pattern is one of inconsistent implementation that failed to bring the full potential of many changes to fruition.

Thai Government Implementation

Many major government policy shifts, especially those directly affecting fishing vessels, were enacted hastily by royal ordinances and revisions to existing laws. Although these rapid changes were necessary to disrupt a previously immovable system, they were also top-down, led by individuals with little expertise in fishing or seafood, often bypassed normal consultative channels, and ultimately led to a “lack of collective ownership of the problem” and policies difficult to implement in practice.¹⁷⁵

“To address these challenges, the Thai government has introduced sweeping legislative and regulatory reforms that, on paper, are some of the most comprehensive measures the industry has ever seen. But implementation has been inconsistent, both in ports and at sea. Inspection systems are underfunded, plagued by corruption, and constrained by inadequate vessel monitoring capabilities. More importantly, inspectors have failed to identify victims of forced labor, as they lack the resources and incentives to check crews and interview workers.”

INGO interviewee¹⁷⁶

The **Port-In/Port-Out system (PIPO)** received more criticism than any other policy implementation in Thailand. A legal framework that included a port inspection system was critically important, as it defined the Thai fishing industry as one that was overseen and regulated in ways not done before. However, despite tens of thousands of inspections each year, inspectors largely fail to identify victims of forced labor. Multiple studies have demonstrated

the ineffectiveness of implementation, citing various reasons. Some blame the structure of the system, including gaps in the network of PIPO centers, underfunding, and a lack of incentive for inspectors to report problems (their workload will increase if they find issues, as they will need to investigate them). Some blame the people in the system, noting frequent turnover, lack of training, language barriers, and lack of relevant background. Others suggest it is a cultural issue, where it is better not to find problems, or a corruption issue where inspectors benefit from looking the other way.¹⁷⁷

“*Thai people often hesitate to clearly report problems, creating repetitive issues that remain unresolved. It’s critical to educate people about the importance of openly addressing issues for effective solutions.*”

Thai supplier/association discussion group participant

“*Often, PIPO staff are reluctant to report issues due to close relationships with vessel owners or personal connections. We must educate them that reporting is aimed at resolving issues, not punishing or imprisoning individuals.*”

Thai supplier/association discussion group participant

These implementation issues went beyond the PIPO centers to other labor inspections as well. The **Thai criminal justice system was critiqued for not effectively identifying and investigating instances of forced labor and labor trafficking**. The unit responsible for investigations within the Royal Thai Police was understaffed and staffed primarily in Bangkok rather than where many of the factories and ports are located. This led to the need to leverage local police officers to assist with investigations, despite their lack of training on how to investigate labor issues.¹⁷⁸

“*Systems put in place to help improve [vessels] were all government-led, but workers have a fear of government due to their migration status.*”

Philanthropic interviewee

Other implementation failures often mentioned included continued hidden costs associated with recruitment even when employers commit to the employer pays principle; fishing workers not having access to their ATM cards; and employers paying workers less than the reported amounts.¹⁷⁹

Internal government coordination issues at the level of the ministries and departments contributed to implementation challenges. Multiple interviewees discussed how “internal staff across different ministries do not understand each other’s responsibilities and don’t know how they are supposed to cooperate.”¹⁸⁰ This internal fragmentation within the government is a key impediment to consistent implementation.

Despite these challenges, **some systems were implemented with relative success**. For example:

- The electronic databases for vessel registration and licenses were developed and integrated with the GPS-based vessel monitoring systems for boats more than 30 tons and this was seen as a successful effort (in part due to the close collaboration with OceanMind).¹⁸¹
- The Migrant Worker Assistance Centers were evaluated at the request of the Thai government and found to have improved migrant workers’ ability to access and receive advice and services. The same evaluation found improvements that were needed; yet even in their early years, the centers were providing value.¹⁸²
- At various points over the 10 years, reports indicated one or another system was improved, such as the 2019 report that 180 newly trained labor inspectors had been deployed around Thailand.¹⁸³

Many of the reports of government implementation success are associated with the time period of 2017-2019, and some interviewees tied this success to the involvement of a government leader in the Department of Fisheries who was committed to ensuring the effectiveness of the systems.¹⁸⁴ However, some of the later successes (e.g., improvements in the collaboration between Social Security Offices to ensure migrant workers are covered by the Workers’ Compensation Fund) were credited to the collaborative work between the government and Thai CSOs.¹⁸⁵

Private Sector Implementation

Many of the changes were implemented by private businesses, either in response to government requirements or as part of the industry's self-regulation efforts. There is evidence that **implementation was more performative than substantial for some businesses, particularly early on**. An international retailer explained that some businesses engaged in a risk avoidance strategy shifting their purchasing practices without making any efforts to meaningfully remediate the harm in their existing supply chain.¹⁸⁶

Specific to vessels, the owners were widely seen as resisting changes due to their narrow profit margins that made reforming practices difficult. Long after the laws were changed, vessel owners have continued to engage in practices known to be associated with forced labor (e.g., withholding of documents and controlling workers' ATM cards).¹⁸⁷

“ This was a very challenging adjustment, especially for vessel owners, many of whom had no idea how to navigate the new requirements. And throughout all of this, we faced tremendous pressure, particularly from international buyers who demanded fast and full compliance. ”

Thai supplier/association discussion group participant

Other businesses further down the supply chain, such as shrimp farmers, were also seen as less likely to fully implement the changes due to a lack of perceived or real benefits.¹⁸⁸ Even some businesses that directly export to international retailers struggled to implement the mandated practices, feeling that the expectations were too burdensome and unrealistic, as well as **often noting the price structure did not change even as expenses increased**.¹⁸⁹

“ At the same time, buyers began pressuring us, insisting that we take full responsibility for paying recruitment fees. In response, we hired agencies to recruit workers and paid them 2,000 baht per person. Now, we are expected to monitor those agencies and understand exactly how they interact with the workers. That means sending HR personnel overseas to observe the recruitment process in detail – including small things like the spelling of names, because even minor errors can lead to immigration issues for the workers. ”

Thai supplier/association discussion group participant

Despite these challenges, there are many examples of successful implementation of new practices in the private sector. Specific companies, like Thai Union and Mars Petcare, worked with Thai CSOs and INGOs to shift practices – including committing to and implementing ethical recruitment policies, verifying implementation down the supply chain, and continuing to refine the practices over time.¹⁹⁰ Another private sector implementation success came when two of the largest seafood industry associations in Thailand recommended their members adopt the employer pays principle (and international retailers also began requiring it), and movement was seen within Thai processing companies.¹⁹¹

The STF's code of conduct, audits, and members' demonstrations of traceability in their supply chains are also recognized by some interviewees as a place where private sector implementation has worked well.¹⁹² This is not universal. Some stakeholders report that the audits were largely performative and that auditing practices beyond just the Seafood Task Force efforts are insufficient to identify human rights violations.¹⁹³ More broadly, the STF's support to businesses was recognized as one of the reasons that implementation of new practices went well for many companies, given the newness of the changes.¹⁹⁴

Disrupted Implementation During COVID

Both government and private sector implementation of policies and practices were disrupted during the COVID pandemic. Audits and inspections moved online to meet physical distancing requirements, a shift widely seen as ineffective.¹⁹⁵ Workers faced new risks and harms as lockdowns and outbreaks occurred in factories and on vessels. Government efforts in implementation and law enforcement slowed down. Many new laws and regulations

enacted in the 2014-2019 period lacked sufficient time for proper implementation and COVID disrupted the progress that was being made.¹⁹⁶ Budget cuts, staff turnover, and a lack of trained replacements all affected implementation during this time as well. Restrictions made it harder to gather evidence, limiting the number and success of human trafficking and forced labor cases.¹⁹⁷

Private sector implementation also slowed down, with priorities shifting during the pandemic. Buyers and large Thai suppliers shifted to remote monitoring and due diligence efforts.¹⁹⁸ CSO efforts shifted to emergency response, including direct services and even establishing field hospitals for workers. Worker organizing was hindered, with shifts to online trainings seen as less effective and workers facing difficulty gathering due to restrictions on public gatherings.¹⁹⁹

Process of Change F: Environmental sustainability intersected with and influenced human rights priorities

Repeatedly throughout the 10 years, sustainability issues and labor issues came together in both the pressures placed upon Thailand and the seafood and fishing industries as well as the actions taken by the government and private sector. Not all reforms or pressures for reform relied upon this intersection, but at times it was crucial to the process of change. For example, the EU yellow card is a tool that was designed to combat IUU fishing, rather than labor rights issues. Yet, the warning and later issuance to Thailand was explicitly connected to human trafficking and slave labor.

“The process for designating countries as non-cooperating under EU IUU regulations is about illegal fishing, but in this case, the EU was prepared to hear information about human rights ... There were also genuinely people within the European Union agencies who were really disturbed by what they were hearing and wanted to see action taken on it.”

International retailer interviewee

It is also important to acknowledge that evidence of IUU fishing, while often a strong signal of human rights abuses can occur without abuses, and human rights abuses do not necessarily signal an IUU problem. This mixed relationship between the two issues further complicates bringing the two together as levers for change.²⁰⁰

Media, INGO and CSO investigations and advocacy also sometimes combined the two issues.²⁰¹ For example, organizations like the Environmental Justice Foundation (EJF) consistently highlighted the intersection, even titling a report: “Pirates and slaves: How overfishing in Thailand fuels human trafficking and the plundering of our oceans.”²⁰²

The reforms implemented by the Thai government and the private sector often connected the two issues. Many of the early changes by the Thai government, with guidance from the EU, EJF, the STF and others, advanced IUU and labor rights goals, while others were more explicitly focused on one or the other. For example, the banning of transshipment and limited days at sea helps to protect workers from long-term isolation at sea. However, limiting days at sea also helps to control overfishing, a critical component of responding to IUU problems. While policy integration across human rights and sustainability was evident, the implementation still had significant gaps, partly because responsibilities were split across different government agencies.²⁰³

The private sector also recognized and responded to the intersection. The STF approach acknowledges the close interconnection of IUU fishing and human rights abuses, even as many of the solutions advanced focused on one or the other.²⁰⁴ Similarly, business leaders advancing change in their own companies often led their organization’s sustainability programs with goals that included both environmental and human rights. Some see evidence of IUU fishing practices as strong signals of human rights abuses, while also acknowledging that IUU doesn’t always mean human rights abuses are happening and the presence of human rights abuses does not necessarily signal an IUU problem.²⁰⁵

The evidence strongly supports a conclusion that efforts to address forced labor and human trafficking in the Thai seafood supply chain depended, at specific points and within specific venues (government or private companies), upon the intersection of environmental and labor issues. Not all changes were linked to this intersection, but where the linkage existed, it aided in the efforts to tackle the human rights abuses. While this proved largely helpful, some stakeholders also noted that when environmental issues were the primary focus, it led to human rights issues being

addressed in insubstantial ways, failing to tackle the root causes of the problems. There is also some concern that when IUU violations are substantially decreased, the pressure to continue reforms to address ongoing human rights violations will also decrease.²⁰⁶

The Intersections of Conditions and Processes for Change

The six processes of change did not operate in isolation but rather reinforced, amplified, and sometimes constrained each other throughout the decade of reform, while also depending on the underlying conditions for change. Understanding these intersections reveals how systemic change accelerated during specific periods and stalled during others. The intersections are explored throughout Sections 3 and 4, but a few highlights include:

Disparities in Outcomes Between Processing and Fishing

Although improvements in worker outcomes were seen in both fishing and seafood processing, the **improvements were more significant and durable for seafood processing workers**, as explored in Section 3 below. The disparity in progress between the seafood processing industry and fishing vessels can be attributed to the fundamental differences in market proximity to international buyers and the associated financial incentives to comply (Condition 6 – Market Dynamics), which led to the lack of motivation for change by vessels owners even as other private sector actors were motivated to improve (Condition 3 - Stable Motivations for Change); the implementation of the policies, both in terms of effectiveness and consistency (Process E - Consistency of Implementation); and the inherent isolation workers experience when on fishing vessels.

Leadership and Pressure Dynamics

The most powerful combination occurred when individual leaders (Process B) strategically leveraged moments of high external pressure (Process C) and their sector's motivations for change (Condition 3).

For example, the Thai Department of Fisheries Director General used the EU yellow card pressure to advance comprehensive reforms between 2017-2019, while private sector leaders like those at Thai Union utilized media exposés to advance dramatic internal changes. Conversely, when key leaders departed, the system's ability to respond effectively to external pressure significantly diminished, even as new pressures encouraged continued reforms.

Bold Actions and Pressure for Change

The dramatic early actions (Process A) created both momentum and long-term vulnerabilities in Thailand. The military government's rapid, top-down reforms transformed the system quickly but generated limited stakeholder buy-in, particularly from vessel owners. The decrease in external pressure (Process C) before the reforms had been fully implemented and refined led to a stalling of progress by 2020. The combination of a half-way reformed system within Thailand, the lack of continued pressure, and the lack of ownership due to how reforms were undertaken became apparent during the backsliding period (2023-2024), when the democratic government faced pressure to roll back key reforms that had been imposed rather than negotiated, particularly those with the most significant negative impact on the fishing industry. The bold actions were essential for breaking through initial resistance but created sustainability challenges that persisted throughout the decade.

Sustainability and Labor Intersection as a Strategic Amplifier

The sustainability and human rights intersection (Process F) functioned as a strategic amplifier for other processes. When individual leaders (Process B), external pressure (Process C), and philanthropic resources (Process D) aligned around this intersection – as with the EU yellow card or EJF's advocacy – change accelerated dramatically.

Market Dynamics as a Fundamental Condition

Condition 6 (market dynamics) influenced how all the processes played out. When market risks were high (yellow card, TIP downgrade), individual leaders had greater latitude to implement bold actions (Process B: Leaders), philanthropic investments found more receptive audiences (Process D: Philanthropy), and external pressure translated more directly into systemic changes (Process C: Pressure). As market pressure decreased post-2019, the same processes became less effective at driving change. The consistent market dynamic of seeking the lowest price also contributed to a lack of "loyalty" to Thai suppliers, even as they implemented the necessary reforms. This lack of loyalty then decreased the pressure and motivation for Thai suppliers to continue or expand reforms.²⁰⁷

At times, market pressure could be supplemented with other sources of pressure with some success. For example, the Praxis Labs 2019 report did not create direct market pressure, but did successfully create pressure for the STF to improve its processes even during a time when market pressure was decreasing.

Cultural and Political Constraints on Process Effectiveness

Condition 7 (Thai Cultural and Political Dynamics) consistently bounded what the processes could achieve.

Even when bold actions were taken (Process A), implementation remained incomplete due to xenophobia and corruption. Philanthropic resources, no matter how strategically deployed (Process D), could not overcome legal restrictions on migrant worker organizing. Individual leaders, however skilled (Process B), operated within systems that fundamentally devalued migrant workers. This condition helps explain why significant progress occurred alongside persistent limitations.

The Stakeholder Motivation Paradox

Condition 3 (Stakeholder Motivations) created both opportunities and tensions within the processes for change.

While stable motivations enabled sustained pressure and action over time, the fundamental differences in motivation – reputation vs. economic survival vs. worker welfare — meant that cross-sector collaboration (Condition 5) required constant navigation of competing interests. This explains why implementation was often incomplete (Process E): Stakeholders supported changes that aligned with their core motivations but resisted, undermined or ignored changes that threatened them. However, a variety of individuals in positions of authority moved between sectors, sometimes in government, other times in INGOs, and even in international retailers and Thai suppliers. This movement helped to facilitate overlaps between stakeholder motivations, decreasing some of the tensions.

Understanding these intersections reveals that systemic change in complex, multi-stakeholder contexts requires not just the presence of favorable conditions and active processes influencing change, but also strategic attention to how they interact and reinforce each other over time.

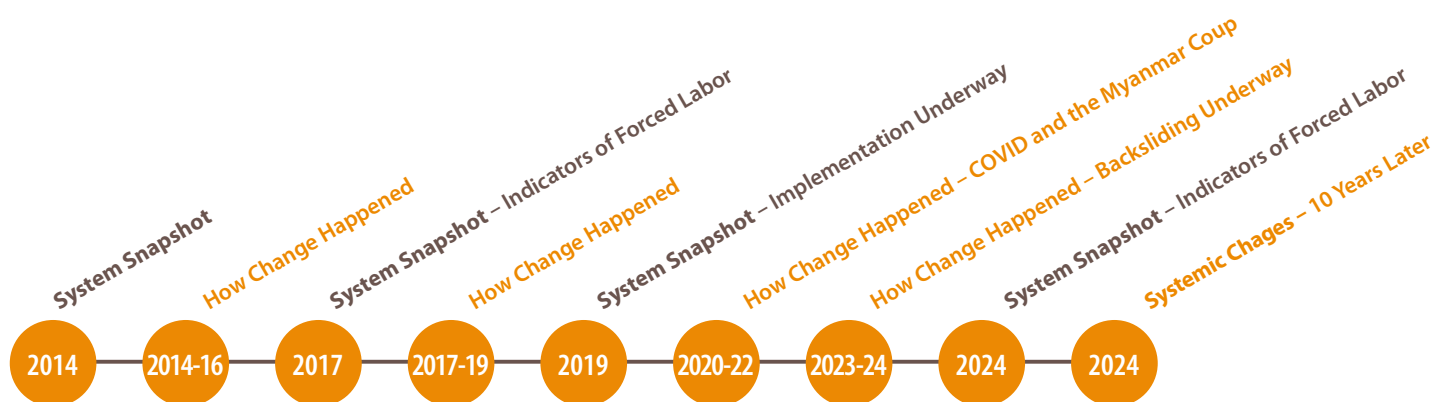


Photo: © Stride, Josh/Humanity United. Fishers with catch barrels on vessel. Thailand. 2016.



Section 3: Time Periods of Change

Photo: © Stride, Josh/Humanity United. Fish at market in Thailand. 2016.



The conditions and processes of change identified above can be seen in the storyline of how change happened over time. The ten years have been broken into four distinct periods:

- 2014-2016 when extreme forms of forced labor and human trafficking were exposed, and early, rapid action occurred in both the private sector and Thai government;
- 2017-2019 when the private sector and the Thai government refined and expanded changes, leading to the international pressures on the system decreasing
- 2020-2022 when COVID disrupted the system, with backsliding on still emerging practices and the Myanmar coup additionally putting pressure on the system; and
- 2023-2024, when the newly elected democratic government began discussing, recalibrating, and rolling back reforms despite increasing international and internal industry pressure.

Within these time periods, snapshots of worker experiences and the state of the system are used to make visible the impact of change, while descriptions of the events and drivers of the events help to make visible how, why, and under what conditions change happened. The Conditions of Change and Processes of Change explored in the previous sections came from the detailed analysis of how change happened over time, and examples can be seen throughout the analyses in this section.

2014: System Snapshot

In 2014, Thailand's seafood and fishing industries operated as a perfect storm of exploitation, where desperation, weak governance, predatory business models, and corporate indifference converged to create widespread forced labor and human trafficking. While the industries had successfully established themselves economically, having built the necessary infrastructure and meeting the sanitary standards that made products appealing on the global market, much of the supply chain remained opaque, allowing Thai suppliers and international buyers to ignore the very present and significant human rights violations.²⁰⁸ The system was built on the backs of migrant workers from Myanmar and Cambodia, driven from their homes by poverty and trapped in a web of abuse that stretched from fishing boats to processing facilities to global dinner tables. It was described as *"globally notorious for being one of the most abusive and destructive economic sectors in the world."*²⁰⁹

For migrant fishermen, the reality was stark and terrifying. "My first experience aboard fishing vessels was extremely unsafe; I was too fearful to sleep on my first night due to the presence of firearms carried by the boat leader," recalled one worker.²¹⁰ The fear was justified as fishing vessels at the time operated with minimal oversight and workers faced months at sea without pay, sometimes waiting months or even years for wages that might never come. As a migrant fisher leader in the focus group shared, "Before 2014, employers occasionally delayed payments for six to 10 months or even refused to settle payments entirely, creating severe financial instability," another fisherman explained.²¹¹

Specific to seafood, workers arrived on these boats already experiencing exploitation, vulnerable due to the extreme poverty in their home countries, and willing to migrate for work even amid uncertainty. Lacking legal channels for migration and access to jobs, many workers relied on brokers and even smugglers who charged them excessive fees, immediately trapping them in debt bondage.²¹² Once in the workplace, they discovered that the promises made during recruitment were lies – they faced physical abuse, dangerous working conditions, and complete isolation from any form of help or legal recourse. When they tried to flee their workplaces, some were captured and "sold back" to the employer, adding to their debt bondage.²¹³

The Indicators of Forced Labor

By 2014, comprehensive research by the International Labour Organization and other respected agencies had documented the staggering scope of exploitation in Thailand's seafood industry. The data painted a picture of systematic torture and enslavement that shocked even seasoned investigators.²¹⁴

The statistics were damning: Among surveyed trafficked workers, 94% had no employment contract, 80% reported never feeling free, and 68% had experienced sexual or physical violence. Most shocking of all, in a smaller study of 49 workers, 59% had witnessed executions at sea, while 52% had seen their boss or trafficker harming someone — statistics that revealed the industrial-scale murder occurring within global seafood supply chains. Nearly half (47%) reported at least one injury, while 44% reported a lack of food, and 23% were locked in rooms during their trafficking situation.²¹⁵

The abuse occurred on both land and sea. Studies specifically of seafood processing workers found that as of 2011, approximately 134,000 migrant workers in just the province of Samut Sakhon alone had experienced forced labor in a shrimp factory within the last five years (33.5% of all migrant workers in the shrimp processing industry in the province at the time).²¹⁶ Also in the same industry, within the land-based shrimp peeling sheds and small factories, the evidence strongly supports that the abused workers also included children. An LPN study suggests that over one-third of workers in the small processing plants as of 2013 were under the age of 18, with 22% of workers under the age of 15.²¹⁷

The abuse followed predictable patterns aligned with the International Labour Organization's indicators of forced labor. **Deception** was endemic in both the fishing and seafood industries, with each additional interaction that a worker had on their journey from their home country to a job increasing exploitation risk by 1.5 to 1.7 times.²¹⁸ Brokers routinely lied to workers, promising factory jobs while selling them to boat captains for as little as £250.²¹⁹ The migrant workers who helped to organize others and participated in the focus groups conducted for this study told similar stories, including those from experiences on land and at sea.

“The brokers were a major issue. Brokers would mislead workers, telling them they were going to work in factories, but in reality, they were put on fishing boats.”

Migrant fisher leader focus group participant²²⁰

“After losing a job in Samut Sakhon province, I moved to another province with 11 others in search of new employment. Upon arrival at a factory, we were told to pay 15,000 Baht to a broker and provide a reference letter from our previous employer. The broker then confiscated our documents.”

Migrant seafood leader focus group participant²²¹

Abusive working and living conditions on boats catching “trash fish” included workers who “were chained, beaten, and denied food and medical care,” all while being subjected to constant surveillance.²²² More generally, the work on the boats posed significant risks of accidents and injuries.²²³ Migrants working in peeling sheds also experienced extreme working conditions, forced to squat on the floor for hours at a time, with no health and safety protocols or protective health equipment.²²⁴

Physical violence served as the primary tool of control. Evidence collected by the Guardian in an investigative series showed that migrant men from Myanmar and Cambodia faced systematic beatings, torture, and even execution-style killings designed to suppress resistance. Survivors described witnessing fellow workers torn apart by boats as acts of terrorism against the remaining crew. The violence was not occasional but routine, with workers reporting they were beaten regularly, even when working hard.

“I experienced significant feelings of insecurity and constant potential threats during those early days aboard the fishing vessels.”

Migrant fisher leader focus group participant²²⁵

Intimidation took particularly cruel forms. Traffickers routinely administered methamphetamines to force workers through 20-hour shifts, using drugs not as relief but as instruments of control. “These drugs were administered not for the workers’ benefit but to force them through 20-hour shifts, often with little or no rest,” survivors reported. “Meth was regularly given to keep them awake and compliant, even as they suffered from exhaustion and malnutrition.”²²⁶

Debt bondage trapped workers in perpetual servitude, with interest rates reaching 20% per month. Initial broker fees combined with transportation costs and other expenses created financial obligations that could never be repaid.²²⁷

Studies of workers in peeling sheds found that they would incur debts of TBH 5,000 to THB 50,000 (from USD 163-1,635) as a result of their initial contracts with brokers. With wages of approximately THB 210 a day at the time, workers remained in debt bondage for months to years at a time, with no freedom to change employers or return home.²²⁸

The **restriction of movement** was absolute for workers aboard fishing vessels. Even ashore, workers’ movements were closely monitored, and changing jobs was difficult due to both employer control and the rules and structure of the immigration system of Thailand.²²⁹ Workers on vessels were isolated for long periods, lacking communication, legal protection, or means of escape. Stories of workers being sold from one boat to another, never coming to land, highlighted the extreme nature of their isolation on the high seas. “Victims – mostly migrant men from Myanmar (Burma) and Cambodia – were isolated for long periods at sea, completely cut off from communication, legal protection, or any means of escape.” (Hodal, “Thai Government Urged to Drop Libel Case,” 2014)²³⁰

Similarly, **workers ashore experienced restriction of movement**. The almost entirely female workforce in Thai shrimp processing factories and peeling sheds was closely monitored, and changing jobs was difficult due to both employer control and the rules and structure of the immigration system of Thailand. Additionally, some reports indicate that migrant workers may not have been allowed to leave their workplaces during time off without permission.²³¹

Wage withholding was widespread, with workers laboring without pay for years at a time, sometimes receiving lump sums only after long periods of work. Among those who did receive wages, 42% of trafficked workers experienced wage reductions.²³² Even before the reforms began in 2014, Thai CSOs were helping workers to organize vessel by vessel and in processing facilities and seek fair wages. For example:

“Before 2014, employers occasionally delayed payments for 6 to 10 months or even refused to settle payments entirely, creating severe financial instability. Motivated by these experiences, I actively advocated for regular payments to ensure my fellow fishermen would not suffer similar hardships. With guidance from Khun Ploy and the Rak Thai Foundation, I successfully negotiated consistent monthly payments starting in 2014.”²³³

Migrant fisher leader focus group participant

“My colleague Min Ong successfully negotiated monthly payments from his employer beginning in 2013. Before that, payments were irregular, typically delayed between 3 to 6 months depending on the duration of our fishing trips, resulting in significant instability.”²³⁴

Migrant fisher leader focus group participant

Excessive overtime defined daily existence, with workers on boats enduring 20-hour shifts and up to 20 hours per day of labor, seven days a week.²³⁵ Migrant workers in small processing plants were also working excessive overtime, with 40% reported as working longer than 12 hours a day.²³⁶

The **retention of identity documents** by employers eliminated any possibility of seeking help or leaving to find a job that would pay more regularly.²³⁷

The data revealed that forced labor was distinctly targeted at migrants on both land and at sea. A 2013 ILO survey found that while all Thai nationals were working willingly, 9% of Cambodian and 26% of Myanmar

fishers were working against their will.²³⁸ With Thai government estimates of up to 300,000 people in the fishing industry – 90% of them migrants – and far more workers on land in the processing facilities, the scale of potential exploitation was staggering.

The System Designed to Enable and Hide Abuse

Thailand's regulatory framework was not just inadequate — as some INGO leaders have said, it was designed to obscure and enable the problem.²³⁹ The country's 1947 fisheries law was hopelessly outdated, and enforcement was virtually nonexistent.²⁴⁰ In a powerful illustration of this failure, a 2015 government report claimed that inspections of nearly half a million fishery workers had not identified a single case of forced labor, a statistic that revealed willful blindness rather than compliance.

Given the scale of abuses that INGOs and the media were beginning to reveal at the time, **the government's failure to find abuses can only be understood as either deeply incompetent or deliberately designed not to find the problems.** That the Thai government's investigation process itself deterred victims from coming forward suggests that the latter is more likely the reason for no reported cases of forced labor. Workers who sought justice faced systemic disincentives, including inadequate shelter conditions, indefinite delays, language barriers without proper interpreters, and employer bribery.²⁴¹

Meanwhile, migrant workers were legally prohibited by the 1975 Thai Labour Relations Act from forming unions or holding leadership positions in trade organizations, ensuring their voices remained silenced.²⁴² Their fear of speaking up is evident in the ILO 2013 survey findings, which show that 95% of fishers never filed a grievance, despite experiencing numerous abuses and violations of labor rights. However, half of the fishers wanted to join a trade union, with 41% recognizing they lacked adequate legal protections.²⁴³

Corporate Complicity and Global Reach

The international retailers and supermarkets purchasing seafood from Thailand were not passive observers. **Complex supply chains provided cover and obscured abuses for those who did not want to see them, while some companies openly admitted to having slave labor in their operations.**²⁴⁴ As noted in a Guardian exposé in 2014, CP Food's managing director explained, *"We're not here to defend what is going on. We know there are issues with regard to the [raw] material that comes in [to port], but to what extent that is, we just don't have visibility."*²⁴⁵ The business model in 2014 was one of pushing compliance and human rights responsibilities onto Thai suppliers and down to vessel owners, while looking the other way as abuses happened in order to make purchasing decisions based solely on the lowest price.²⁴⁶

Auditing systems were inadequate and easily circumvented by brokers and employers,²⁴⁷ while genuine worker feedback was systematically excluded from monitoring programs.²⁴⁸ The result was a corporate social responsibility facade that provided public relations cover while fundamental exploitation continued unchanged.

Most interviews and documentation suggest that businesses, both retailers and large suppliers in Thailand, were aware of the abuses happening in their supply chains but chose to look the other way. Among other evidence is the already underway actions by some retailers to address the issue before the exposé. Yet, some of the Thai suppliers and vessel owners directly stated in interviews and discussion groups that they were unaware of the issues with forced labor and human trafficking in the Thai seafood supply chains until the exposés, their involvement with the STF, or the changes in laws.

“ These were never considered problems until I joined the Seafood Task Force, where I started learning about these concerns. Nobody in the industry really knew – we simply focused on producing high-quality shrimp. ”

Thai supplier/association discussion group participant²⁴⁹

INGO, Thai CSO, and Philanthropic Readiness and Action

Though the military government was new and just beginning to act, INGOs, Thai CSOs, and international philanthropic organizations were already engaged. Humanity United funded the Guardian exposés and began the formation of the Freedom Fund in partnership with the Walk Free Foundation and Legatum.²⁵⁰ The new Humanity United and Freedom Fund partnership began planning the Hotspot program, which would soon fund Thai CSOs to take an active role in the systemic changes.

2014-2016: How Change Happened

Although this story of change begins in 2014, the preceding years also included critical decisions and actions by multiple actors that laid the foundation for dramatic changes. The European Union (EU) signaled a willingness to downgrade Thailand's entire seafood sector to a yellow card, threatening the country's crucial export market valued in the hundreds of billions of baht.²⁵¹ The yellow card is part of the EU's IUU regulation, however the EU communicated that Thailand's human rights violations in the seafood and fishing industry had to be addressed to avoid the yellow card.

INGOs and Thailand's CSOs were also beginning to place pressure on the country and retailers to change, releasing public reports with damning evidence of the severity and widespread nature of the human rights abuses in the seafood and fishing industry.²⁵² The workers themselves, despite facing enormous risks, were beginning to organize and speak out, supported by organizations like the Migrant Workers Rights Network. CSOs were working directly with workers on a case-by-case basis to alleviate and mitigate harms and hold businesses accountable,²⁵³ and working with journalists, supporting their investigations with access to stories and data.²⁵⁴

In early 2014, a series of media exposés prompted a response from the global community and Thailand, notably the Guardian reports within the "Modern Slavery in Focus" series (Process of Change C).²⁵⁵ These exposés linked the abuses directly to shrimp and pet food sold to Western consumers, naming specific international retailers and supermarket brands as well as major Thai suppliers. The articles even named key leaders individually within some of the companies. Much of this coverage was focused on the shrimp industry and the "trash fish" used in shrimp feed.²⁵⁶ The AP reports also linked child labor to Thailand's shrimp peeling sheds.²⁵⁷ International media exposés included explanations that linked forced labor and human trafficking to global supply chains and explained the complex, systemic nature of the problem.²⁵⁸ This media storm was referenced as a critical driver of change by nearly every stakeholder interviewed and many of the written reports.

Problem documented

- CSOs/INGOs investigated, documented, and reported on the problem
- HU funded of the Guardian investigations
- INGOs and trade unions demand the US government put pressure on Thailand

Rapid action

- Rapid action taken by the Thai military government, including adoption of multiple iterations of new legal framework
- Major global retailers formed the Seafood Task Force inclusive of Thai suppliers and others
- Business associations in Thailand adopted new codes of conduct for their members
- Individual businesses started their own changes

Implementation challenges

- Implementation success hindered by many factors including:
- Speed of legal changes and lack of regulatory infrastructure
- Need to align across multiple Thai ministries
- Corruption at multiple levels of Thai government
- Massive disruptions to fishing industry
- Xenophobia in Thailand
- International retailers shifting sourcing of shrimp to other countries

Problem revealed, pressure builds

- Media exposés published in The Guardian, New York Times, Associated Press
- US Trafficking in Persons report downgraded Thailand to Tier 3
- Threat of an EU yellow card

Pressure continues

- Yellow card issued by EU
- Expansion of philanthropic investments to INGOs and Thai CSOs
- Reforms continued, including through cross-sector collaborations
- Workers supported to advocate for their rights by Thai CSOs
- Multiple legal cases advanced and won against perpetrators and human rights activists

Action Continues and Grows

- Thai Union and Mars Petcare made public commitments and took rapid actions to respond, including in partnership with Thai CSOs
- Trial models of worker representation and grievance systems adopted by Thai suppliers
- Launch of ILO Ship to Shore Rights Project in Thailand
- US sent a mixed message with upgrade in TIP report alongside new Tariff Act restrictions

From outside of Thailand, a group of 18 INGOs and trade unions issued a letter to former Secretary of State John Kerry in the United States, urging the U.S. to downgrade Thailand to Tier 3 for human rights violations in the seafood industry.²⁵⁹

The media exposés benefited from two critical conditions for change that were already in place. **Philanthropy was strategically funding the Guardian** (specifically Humanity United's grants to the Guardian, which did not direct the news outlet to investigate, but did enable the investigations), which demonstrates an early and significant impact on the system by a philanthropic targeted intervention.²⁶⁰ CSOs and INGOs provided years of evidence and investigation, including previously published public reports, to support the journalistic investigations. They were also already organizing seafood and fishing workers. Both actions demonstrate their capacity to be critical agents for change in the system.²⁶¹

A second major disruption was the 2014 U.S. downgrade of Thailand to Tier 3 on the TIP report, which was seen as critically important for its signaling of potential market disruptions for the entire seafood industry in Thailand and for international retailers and supermarkets.²⁶² Though most interviewees do not believe it led to much action by itself, it was another pressure point amid the media storm and signaling from the EU.

Early efforts by the democratic government of Thailand to address the problems failed. The Thai parliament was unable to pass laws to reform the system.²⁶³ The fundamental drivers of exploitation – poverty, lack of legal migration channels, weak enforcement, and the relentless pursuit of the lowest possible prices – remained intact even as the problem became increasingly visible and impossible to ignore. At this point, **a critical condition for change did not yet exist: the ability of the Thai government to act rapidly** without the buy-in of affected businesses.

However, the ability to act quickly did exist in the private sector. Retailers and suppliers began to act in response to the media exposés and fears of reputational and market risks. Some companies began scrutinizing their own supply chains and implementing traceability measures. Several global retailers, including Tesco, Costco, and Walmart, and Thai suppliers like Charoen Pokphand Foods (CP Foods) publicly committed to reviewing and improving their supply chains.²⁶⁴ Among other actions, Costco and CP Foods led the development of the Shrimp Sustainable Supply Chain Task Force (later renamed the Seafood Task Force).²⁶⁵ The task force initially focused on the shrimp supply chain specifically.

Individual leaders were critical in the shifts happening, including Costco and CP Foods, as they played a central role in how the STF was formed, what it prioritized, and how it progressed over the years.²⁶⁶ Even as global retailers and major Thai suppliers began making changes, Thailand's National Fisheries Association (NFAT) and the Thai Tuna Industry Association (TTIA) adopted new codes of conduct, conducted training, and created informational packets for members.²⁶⁷ These changes were largely seen as performative by interviewees, unlike the shifts happening in the other parts of the private market.

Exporters in Thailand were determined to protect their market. Whether their supply chains were focused on tuna, shrimp, or other seafood products, they used their voices and power to put pressure on the Thai government to protect their industry:

“ We were forced to ask ourselves: what now? What should we do? It was the EU yellow card, the U.S. TIP Report, and The Guardian's investigation that triggered massive changes. The business sector responded by taking various actions, including pushing for legal reforms, just so we could resume exporting and keep our industry alive. ”

Thai supplier/association discussion group participant²⁶⁸

Philanthropic action kept pace with the private sector, with grants from the Moore Foundation (directly) and Humanity United (indirectly) to support the efforts of the Seafood Task Force directly and indirectly. With resources to build its governance structure and act on early priorities, the STF focused on parts of the solution set that rapidly developed into the generally agreed upon needed solutions (another condition for change), including ethical recruitment, supply chain tracing, and supply chain transparency.²⁶⁹

Cross-sector collaboration also took off during this time, with INGOs and commercial entities starting to work together, the creation of the Thai CSO Coalition, which an international INGO helped to launch with resources from a philanthropic organization, and the formation of the Seafood Working Group in Thailand with INGOs and CSOs

involved. The STF also began to work with the Thai Department of Fisheries, with one of the original leaders of the STF fostering the relationship.²⁷⁰

The 2014 coup in Thailand, led by the military junta, marked a critical turning point, prompting the government to act swiftly as external pressures mounted. As noted by many interviewees, the new junta government, the National Council for Peace and Order (NCPO), was not beholden to a specific electorate or traditional circles of patronage and had a focus on overall law and order, thus able and willing to act rapidly and in potentially unpopular ways.²⁷¹ As one stakeholder described them, “The junta takeover was a wonderful gift – they were all about action, deadlines, getting something done.”²⁷² With this condition for change in place, Thailand joined its suppliers in rapid, bold actions to drive immediate changes.

Some interviewees and discussion group participants suggested that a primary motivator for the Thai government to act quickly was the desire to legitimize the military government.²⁷³

“ *International criticism of Thailand's post-coup government, especially on human rights, led to intense regulatory focus on the fisheries sector as a political response to restore credibility. Our government at that time was essentially a military government, right? Because of this, foreign countries criticized us for not being democratic ... These countries then attacked us on various issues, especially human trafficking and forced labor.* ”

Thai supplier interviewee

However, the initial actions taken by the NCPO resulted in a law that did not meet the EU's expectations in part because the Thai government was more willing to work on the regulation of boats than to address the labor rights issues more broadly.²⁷⁴ “The EU wanted to see the draft of the law, so they could make recommendations, but Thailand didn't share the draft. When it was passed, the EU didn't accept it, so they had to do it again. It wasn't according to international standards,” said a government interviewee.²⁷⁵

In addition to fisheries-specific reforms, **human trafficking became a national focus when the military took over.**²⁷⁶ Initial steps included strict enforcement against irregular migration in 2014, which resulted in a mass exodus of workers with more than 250,000 Cambodians leaving Thailand in just a three-week window.²⁷⁷ The immediate and negative impact on multiple industries in Thailand led to the NCPO opening a new registration window for migrants, during which nearly 1.6 million migrants registered.²⁷⁸

During 2014, **human trafficking also became a regional issue** for Thailand, with the Thai government repeatedly asked to assist with the rescue of Rohingya migrants from Myanmar who were trafficked into Thailand. Anti-Slavery International, the International Organization for Migration, and the Myanmar Association of Thailand all asked that the Thai government assist in the rescues. While not all of these cases were specific to seafood and fishing, they put pressure on the government to reform the trafficking system more broadly.²⁷⁹

A yellow card was issued in 2015, putting pressure on the military government to continue to reform laws related to both IUU fishing and labor rights. Another example of **cross-sector collaboration was critical during this period** – the close relationship between the EU and Thailand in their bilateral reform dialogues focused on both the IUU fishing practices and the labor issues,²⁸⁰ while EJF (an INGO) concurrently worked closely with the Thai government behind the scenes to support the development of policies and practices to address the problems. The relationship with EJF was focused on both the IUU and labor issues.²⁸¹

From Exposure to Action: 2015-2016

Where 2014 is best characterized as a year of exposure and big public-facing actions, 2015 and 2016 represent the storm of policies and practice changes, with actions that directly affected many different parts of the supply chain. It was a period of transformation, with a legal framework put into place that was foundational for future developments.

In early 2015, the **NCPO began rapidly adopting and implementing new laws**, including ordinances that established the Command Center for Combatting Illegal Fishing, limited fishing vessels to 30 days per trip, stopping transshipment (which enabled the isolation of trafficked workers at sea indefinitely), created the Port-In/Port-Out (PIPO) inspection system, amended the Anti-Trafficking legislation, established One-Stop Centers for migrant workers, introduced new wage protections and minimums for Thai fishers, developed the National Fishers Policy Committee, required boats to be licensed and created a buy-back program for vessels that chose not to get licensed, among other reforms.²⁸² The shrimp peeling sheds were largely shut down in response to evidence of child labor.²⁸³ Though some of the changes focused on supply chain issues associated with shrimp and prawns (including the “trash fish” in the supply chain), many reforms were more general to all commercial vessels regardless of product, and a few reforms had a particular impact on the tuna industry (e.g., eliminating transshipment).

Quite a few of these reforms were **either relevant to both IUU and labor concerns** (e.g., monitoring, control, and surveillance practices, electronic reporting systems, and requiring CCTV to be installed on fishing vessels to record continuous fishing and transshipment activities) **or primarily addressed IUU issues** (e.g., drum-rotation sensors to monitor the application of fishing gear).²⁸⁴ Some reforms were part of a larger set of interconnected reforms that allowed both labor and IUU concerns to be addressed together. For example, the 30 PIPO Centers were critical for combating labor abuses and were connected to other reforms, like the requirement for fishers to have access to their own identity documents and ATM cards and the importance of appropriate safety and first aid kits on vessels.²⁸⁵

Other reforms focused on **regularizing migrant labor**. In 2014, the NCPO established 79 One-Stop-Service Centers (OSS) across the country, enabling registration through the “pink card” system. This card provided a temporary legal status and work permit and was tied to the work contract, which limited movement not just between jobs, but also movement outside the province of employment. It also gave workers access to national health care services.²⁸⁶ However, it limited workers’ abilities to switch employers and penalized workers who left for reasons not permitted.

There was ample **evidence of cross-sector collaboration between the Thai government and many other stakeholders**, despite the rapid pace of change. Representatives of the STF, EJP, the EU, and other INGOs and CSOs were involved in various dialogues and provided expertise and insights. OceanMind began its work with the Department of Fisheries during this time, working to improve vessel monitoring and enhance port inspections.²⁸⁷ Across interviews and discussion groups, many stakeholders described this as a time when the government was soliciting input and help with the reforms.²⁸⁸

Many of these **cross-sector collaborations were made possible due to philanthropic funding**, with an increase in philanthropic resources flowing into INGOs working on issues in Thailand and the Thai CSOs.²⁸⁹ For example, philanthropy and the STF collaborated to fund OceanMind’s work with the Thai government to develop a vessel monitoring system. In other cases, such as the many CSOs who worked with government agencies during this time, the funding came from philanthropic institutions (and particularly from Humanity United) to the CSOs as part of a broader effort to strengthen their capacity to influence change.²⁹⁰

Philanthropic funding also enabled INGOs to continue to put pressure on the Thai government and the private sector, such as Greenpeace’s downgrading of 14 canned tuna brands for environmental and social reasons (once again connecting sustainability with human rights).²⁹¹ Thai CSOs at the time were already supporting workers, responding to and seeking remedies for abuses, as well as continuing to provide evidence and stories to journalists.

The MWRN and other CSOs were actively **supporting workers to advocate for their rights**. One of the more visible cases during this time was in 2015 and involved the Golden Prize factory, where workers were forced to work 17-hour days, underpaid, including no overtime wages, had terrible living conditions, and were unable to access healthcare despite workplace injuries, among other harms. The negotiations were only partially successful in 2015, despite protests, military involvement, and even the TTIA asking the company to resolve the issue and yet also represented an unprecedented win at the time. Yet, even this partial success was a significant win at the time, going far beyond what had been achieved before.²⁹²

CSOs and INGOs were also actively involved in legal strategies to support individual workers and to bring forward precedent-setting, high-profile cases. The Kantang case demonstrated the importance of legal strategies during this time, with the earliest involvement by international INGOs (EJP specifically) in 2013 and two years of work before the

perpetrators were held to account, with a guilty verdict in November 2015. This case helped to continue visibility internationally for the issue after the initial media exposés, with eight of 11 defendants charged with and found guilty of human trafficking, including the leading offenders facing over a decade in prison and THB 600,000 in fines.²⁹³ The case was critical not just for making visible the depth of the forced labor and human trafficking but also for bringing visibility to concerns about the corruption in the justice system.²⁹⁴

Other cases also advanced in 2015-2016, including two in Ranong, one of the provinces recognized to have significant human rights issues. In one case, Thai police raided a boat and found 15 Cambodian crew members who were victims of trafficking. Despite the evidence gathered, the court acquitted the perpetrators, offering a variety of reasons from the failure of the migrants to talk to authorities (despite language barriers) to stating that the alleged 22-hour work days must be fabrications. These cases demonstrated the lack of understanding in the court system of trafficking issues and the need to train law enforcement officials.²⁹⁵

Thai CSOs continued to be involved in prosecutions throughout the 10-year period, with CSOs steadily helping to identify and support workers who sought remedy through the legal system. Many of these same **CSOs were also building their capacity** during this time to collect systematic data and build evidence to advocate for continued changes,²⁹⁶ and through structures like the CSO Coalition they were also strengthening their collaborative efforts to advance reforms.²⁹⁷

Not all court cases focused on trafficking. In 2014-2015, a processing company in Thailand (not in the seafood industry) accused a researcher of defamation, and the court agreed. He was found guilty, leading to a three-year suspended sentence and a THB 200,000 fine.²⁹⁸ The Royal Thai Navy brought criminal defamation lawsuits against two journalists in 2013-2015. Although the journalists in this second case were finally acquitted, these two cases highlighted how the Thai government could use **criminal defamation as a tool to intimidate human rights advocates and reporters**.²⁹⁹

Unfortunately, the **government reforms faced implementation challenges from the very beginning**. The reforms were complicated in design, with multiple departments being asked to work together, often with little history of past collaboration. Many key individuals involved, whether designing the laws or implementing them, had little knowledge of the fisheries and seafood system. Critical functions, such as the implementation of PIPO centers, rely on multidisciplinary teams with little experience working together and a limited understanding of port and vessel operations.³⁰⁰ Stakeholders in the study saw corruption as a steady barrier to successful implementation, along with a lack of commitment of resources at the local level for implementation.³⁰¹



Photo: © Stride, Josh/Humanity United. Catch at port in Thailand. 2016.

Some of the reforms were implemented more fully than others. For example, the VMS system developed with OceanMind was generally seen as successful at improving vessel monitoring, contributing to more effective enforcement against illegal fishing and forced labor practices.³⁰² The most commonly cited evidence of poor implementation was the lack of cases found during the PIPO inspections. For example, a 2015 report found that not a single new case of forced labor was identified after 474,334 fishery workers participated in PIPO inspections.³⁰³

Despite the implementation limitations, **the fishing industry was significantly affected**, with many vessels no longer in use, limits on how many days they could be in use, and requirements that owners reported were burdensome, expensive, or simply not possible. By 2015, roughly 3,000 Thai fishing vessels had been forced to stop operating, many of them larger commercial fishing vessels.³⁰⁴ Vessel owners who continued to operate found it harder to recruit workers due to the visibility of the risks,³⁰⁵ which may have served as a driver of continued use of irregular, informal recruitment to coerce people to get on boats and continued use of debt bondage, wage withholding, and documentation retention to keep workers on boats.³⁰⁶ **Processing plants did not suffer as extreme of disruptions** during this time. Though they too were affected by the new laws, much of the focus was on vessels and shrimp peeling sheds, and processing plants were also more willing to change due to their understanding of the export market and desire to continue selling abroad.³⁰⁷

International retailers began to shift their sources of shrimp supply even as Thailand sought to solve its supply chain problems. Some disagreement exists among stakeholders who participated in the study as to when and why this happened. The combination of the disruption to the supply chain from a disease outbreak that had happened in the Thai shrimp industry a few years earlier,³⁰⁸ the disruption caused by the closure of shrimp peeling sheds, and the readiness of other countries (most notably India) to step in and replace Thailand gave buyers a reason and opportunity to begin shifting their supply chains. Though some interviewees believe this shift in supply chains started as early as 2012, others reported it wasn't the reputational or disease risk that mattered. Instead, they suggested the large buyers only left after it became clear that addressing human rights in the Thai supply chain would result in the product being more expensive. The reality of the market shift is more complex than either story, however. **Market dynamics in this case were affected by the cost of reforms and the disease outbreak** (with a drop in purchasing after the disease outbreak and again after many reforms were implemented³⁰⁹), but **also the high import tariffs in receiving countries for processed products, and preferential trade agreements that other markets held and Thailand did not.**³¹⁰ Regardless of the reason, the Thai global share of profits in the shrimp market had fallen from 44% in 2000 to only 10% in 2015.³¹¹

In response to the precarious market dynamics, Thai suppliers had to act. **Thai Union, with a key leader at the head of their sustainability practices who was a driver of change, made many highly visible, dramatic shifts** in practice in a short period of time. They announced and began implementing a revised "Business Ethics and Labor Code of Conduct" for all parts of their supply chain. It included the right to collective bargaining and many different expectations for the health, safety, and welfare of employees from recruitment through working conditions. The company worked with the Migrant Workers Rights Network to map their recruitment pathways into factories and processing plants, identifying where challenges were most prevalent, and launched their Ethical Migrant Recruitment Policy in 2016.³¹² They worked with the Issara Institute as well, serving as a case study example for what a recruitment system free from forced labor and human trafficking could look like.³¹³

While some of Thai Union's reforms were specific to shrimp, many others related to their tuna processing supply chain. Like other businesses taking action to improve their supply chains, they publicized their commitments and sought to repair their reputation as they addressed problems in their supply chains. They also went further than other businesses, publicizing their reforms and ongoing efforts rather than just their commitment to them.³¹⁴

Other **suppliers in Thailand and global retailers were also undertaking reforms.** Trial runs of new models for representing workers (e.g., worker welfare committees and grievance systems) were tried by multiple companies, some with support from INGOs like the Issara Institute.³¹⁵ The STF published a code of conduct that included a no-recruitment fee principle, aligning with the International Labour Organization's guidelines.³¹⁶ They also adopted a new name, the Seafood Task Force, as new emphasis was placed on tuna and other seafood products,³¹⁷ and with it, greater attention was placed on seafood factories, not just vessels.

By the end of this period, Thailand had ratified the ILO Maritime Labour Convention, with the necessary collection of policies related to fishers' conditions of employment, facilities, food, health, medical care, welfare, and social protections, and compliance and enforcement codified across the different laws adopted. Changes on the ground with implementation and business practices were well underway, and many of them were starting to show impact, even with the ongoing implementation challenges related specifically to Thai laws. The ILO had also launched the **Ship to Shore Rights project, which introduced another cross-sector effort**, seeking to partner with the Thai

Government, employers' organizations, workers' organizations, and buyers towards the prevention and reduction of unacceptable forms of work in Thailand's fishing and seafood industries.

With all these different reforms underway and small signals of progress, the U.S. upgraded Thailand to Tier 2 Watch List in June 2016, despite continued concerns and the EU's decision to extend the yellow card.³¹⁸ However, at the same time, the U.S. Trade Facilitation and Trade Enforcement Act of 2015 (amended the Tariff Act) became effective, removing the consumptive demand exception clause and **creating new pressure on industry to monitor their supply chains** to prevent any reasonable indications of forced labor.³¹⁹ Additionally, the ILO published a report in 2016 that showed continued needs for reform.

In some ways, the 2014-2016 period can be described as an onslaught of new reforms, both public and private, with some immediate and dramatic impacts, as well as many other smaller effects. Overall, there was a sense of rapid action, sometimes chaotic, and uncertainty about where it would all land.

“ Looking back, the Thai response was to check every box, try everything at once. They were grasping at straws in a lot of areas. Some of those less effective systems are still in place now, and cost billions. E.g., was face scan really needed? And duplicative systems where two systems are held by the Marine Dept, and OPW has their database. ”

INGO interviewee³²⁰



Photo: © Stride, Josh/Humanity United. A catch being sorted Thailand. 2019.

2017: System Snapshot

By 2017, with government and private sector reforms well underway, workers in the Thai seafood system experienced a mix of progress and persistent abuses. Two major international studies sought to understand the scope of impact (the ILO and HRW reports released in 2018) through interviews with migrant workers. The 2017 ILO study surveyed 434 workers across fishing and seafood processing facilities in 11 provinces, while Human Rights Watch interviewed 248 current and former workers across multiple provinces, **revealing persistent exploitation alongside emerging progress in certain areas.**

Overall, among ILO survey respondents, only about a third (29%) of fishers reported no experience of forced labor indicators in their work over the 12 months before the survey, while 56% of workers in seafood processing reported no indicators.³²¹ Human Rights Watch interviewed 138 currently employed fishers and found evidence of at least one indicator of forced labor among 90 (65%), using a framework adapted from the ILO approach for measuring forced labor. Neither the ILO nor HRW numbers have shown a significant change since the ILO 2013 report.³²² One instance of forced labor was identified based on a combination of indicators under the “unfree recruitment” dimension. Ten cases of forced labor were identified based on a combination of indicators from the “work and life under duress” dimension. Finally, fifteen instances of forced labor were identified based on a combination of indicators from the “impossibility of leaving an employer” dimension.³²³

The most common indicator of forced labor in the 2017 ILO survey was deception. In total, 37% of fishers and 23% of seafood processing workers reported **deception** in their recruitment, defined as work conditions that were different from what was agreed.³²⁴ Interviews conducted in 2016 by Human Rights Watch identified men who were promised factory jobs and who paid little for their travel, and then were coerced or forcibly detained both on and off fishing boats.³²⁵ A notable case from this time period involved 15 Cambodian workers who were promised jobs in fish processing plants but were instead forced to work at sea for 22 hours a day over 13 months.³²⁶

During this 2015-2017 period, research suggests that fishers experienced more **restriction of movement** than seafood workers on land. Constant surveillance by the skipper and senior crew within a confined space was typical on Thai fishing boats.³²⁷ Workers reported being physically or psychologically detained between fishing trips, along with being unable to escape before boarding the fishing vessels.³²⁸

Overall, 30% of the fishers and 7% of seafood workers reported that they **did not have control of or access to their identity documents** (which can restrict the ability to leave employment). Pink cards of trafficking victims are typically confiscated and held by the broker, boatswain, or skipper. Most fishers interviewed had laminated facsimiles or, in some cases, paper photocopies of their cards. The real cards were typically kept by the skipper on the boat or by the employer in their office.

Findings from the HRW and ILO studies during this period differed significantly on levels of **isolation**. Although the ILO study found that no respondents reported staying out at sea beyond the 30-day limit in Thai law, and the average number of days at sea per fishing trip was nine,³²⁹ the HRW report interviewed workers in 2016 who were still experiencing significant isolation, particularly aboard long-haul or overseas fishing vessels.³³⁰ The ILO study also found that the previously frequent practice of transshipment (when fish were taken by another boat to shore, leaving workers on the ship) was uncommon by 2017, with less than 10% of workers reporting transshipment occurring.³³¹

Workers on vessels also continued to report problematic working conditions, with 40% of fishers and 22% of on-land seafood workers reporting **abusive or unsafe working conditions**. For fishers, this also includes their living conditions, including issues like lack of access to toilets (59% of workers) and showers (50% of workers), as well as not having their own beds (73% of workers) or a locker to store their personal items (69% of workers).³³² Other problems reported included lack of medical care, poor sanitation (food and water), overcrowding (working and sleeping conditions), and other unsafe working practices. Notably, new safety standards passed during this time period were intended to address these issues, but it appeared that enforcement was inconsistent.³³³ In total, almost one in five workers were injured on the job, with 27% of fishers reported having been injured on the job at the level that required medical attention, and 13% of on-land seafood workers reported the same.³³⁴

Reports of **workplace violence** (3%) and threats of violence (9%) against fisher respondents were lower in 2017 than in 2013 (10% and 17% respectively), possibly due to the new requirement for Thai commercial fishing vessels to come to port at least once every 30 days.³³⁵ However, reports of violence in the HRW study did continue to show beatings, killings, and other severe abuses, if less frequent, were still affecting workers, particularly those who complained or attempted to escape. Testimonies described being beaten with chains and witnessing fellow crew members being killed or thrown overboard. Despite the brutality of these acts, HRW’s research found a lack of prosecution for violent crimes, allowing physical abuse to continue largely unchecked.³³⁶

Workers during this period continued to report intimidation and threats, including fear of job loss and deportation as retaliation for organizing or punishment for other minor issues. As a result, studies of this period suggest that workers were afraid of speaking up, reporting abuses, or utilizing complaint mechanisms.³³⁷ Overall, 12% of the respondents in the fishing and seafood processing sectors experienced some form of harassment or verbal abuse, and 7% faced threats of violence at work. However, the drastic measures employers took to control workers before 2014 were not found in these studies, suggesting a gradual change may have been underway.

Identity documents continued to be withheld, with 30% of workers reporting that **their employers retained** these documents. This was one of the few places that the ILO found an increase over their 2013 findings.³³⁸ Documents confiscated by brokers and employers included passports, work permits, and contracts.³³⁹

Another increase was the **withholding of wages**, specifically for fishers, with an increase to 24% from the previous findings of 12% in 2013.³⁴⁰ One driver of this problem was the continued use of cash payments, despite new laws requiring electronic payment, which were intended to help safeguard against wage theft and withholding.³⁴¹ Among the 53% of workers who reported wages being deducted, roughly half the reported deductions were associated with legal practices (e.g., paying back advances on their salary) and half with illegal practices (e.g., payment for pink cards or clothing and equipment).

The average monthly wages after deductions for fishers in this survey were only THB 7,730, **less than the minimum wage** at the time.³⁴² Overall, one in three respondents (34%) reported being paid less than THB 9,000 per month (before deductions). There was a significant disparity between men and women, with 73% of men receiving the minimum wage or more, while only 48% of women received it.

One promising improvement was the decrease in reliance on brokers and less evidence of **debt bondage**. However, financial vulnerability persisted, with workers becoming indebted due to advances, particularly in relation to seasonal employment.³⁴³

Finally, workers during this period continued to experience **excessive overtime**, though not at the rates previously reported. In the seafood sector, respondents worked an average of 6.1 days per week, and the average workday was nine hours long. Around 29% worked more than 10 hours per day. In the fishing sector, respondents worked an average of 6.2 days per week, and the average working day was 11 hours. Around 22% of the fishers said they typically worked more than 14 hours per day. Under section 5 of the 2014 Ministerial Regulation, fishers must have no less than 10 hours of rest in any 24-hour working period and no less than 77 hours in any 7-day period. Workers who reported being required to work overtime were sometimes paid (55% among seafood workers) and other times not. Among fishers, only 2% reported that their overtime hours were paid.³⁴⁴ Cases of fishers working more than 14 hours a day were extremely common among the workers interviewed by Human Rights Watch—the average working hours among interviewees who provided such information equated to almost 16 hours a day.³⁴⁵

Worker leaders described their experiences during this period:³⁴⁶

“ We had to rely on silent endurance or informal networks for support. ”

Migrant worker leaders focus group participant

“ After losing a job in the Samut Sakhon province, I moved to another province with 11 others in search of new employment. Upon arrival at a factory, we were told to pay 15,000 Baht to a broker and provide a reference letter from our previous employer. The broker then confiscated our documents. ”

Migrant worker leaders focus group participant

“ I joined MWRN in 2016 after experiencing severe abuse. At one point, my employer even pointed a gun at my head. However, because I had received training from MWRN, I was aware of legal rights and the procedures to file a case. I fought back through the court system and was able to seek justice. ”

Migrant worker leaders focus group participant

Also, by 2017, 43% of fishing boat workers surveyed by the ILO recalled **signing a contract**, compared to only 6% in the 2013 ILO survey. This dramatic increase reflects legal changes requiring all fishing boat workers to have written contracts. However, most workers interviewed by Human Rights Watch said they had not received a written contract describing key employment terms and conditions, as the law requires. Roughly one-third of fishers interviewed by Human Rights Watch recalled signing a dual-language document but did not know what it was and were not told what it contained.

Overall, this research reveals that while Thailand implemented significant legal and regulatory changes between 2014-2017, **systematic forced labor continued to affect most migrant workers in fishing, with seafood processing showing better but still concerning compliance rates**. The improvements in contract coverage and wage structures were offset by increased wage withholding and persistent violations across multiple forced labor indicators. The new pink card registration system created additional forms of control by tying workers to specific employers, while extreme forms of violence and murder continued to occur at sea despite overall reductions in reported workplace violence.

2017-2019: How Change Happened

The Thai government entered 2017 with a new legal framework for fisheries in place, an upgrade in the U.S. TIP status, and continued concerns about human rights violations from the EU and buyers that the export market depended on. There was also continued government commitment to changes to both migration laws and labor laws, including with the appointment in 2016 of a new Director General of the Department of Fisheries, who was invested in seeing the systems work effectively.³⁴⁷

Improvements in the Fisheries System

The new Director General was widely regarded by stakeholders in the study as a **critical leader with the ability to navigate across sectors and cultures**, which allowed him to continue and expand reforms to the Thai legal system for fisheries management to respond to IUU and labor rights issues. With his strong leadership at the Department of Fisheries, amendments to multiple laws were undertaken along with the development of regulations and implementation infrastructure. As of 2016, the Command Center for Combatting Illegal Fishing (CCCIF) had been moved to his Department, while still being an interagency taskforce. This also enabled his leadership in implementing changes. He leveraged the pressure of the EU's yellow card to advance a range of improvements, including enhancements in vessel registration and monitoring, as well as inspection processes for vessels, crew, and catch.³⁴⁸

During this time, significant restructuring of government departments continued, and **greater resources were directed to inspections and monitoring**. An electronic traceability system was implemented in 2017, which stored complete, accurate, and consistent key data elements in accordance with critical tracking events in the Thai seafood traceability process.³⁴⁹ The new Director also supported multiple public-private partnerships. He actively brought CSOs and INGOs into the reform efforts, including them as advisors, even as they also took on roles as researchers, monitors, and provided direct assistance to workers.³⁵⁰

Revisions to Foreign Worker Management Laws

Outside of the auspices of the Department of Fisheries, the Thai government also adopted the Royal Ordinance Concerning the Management and Employment of Foreign Workers (B.E. 2560) that was intended to address long-standing issues with labor migration, inclusive of, but not specific to, the seafood industry. In some ways, this is not unlike the overhaul of the fisheries legal framework in that it **replaced and unified out-of-date and problematic policies for the management of foreign labor**.

Also, not unlike the fisheries legal framework overhaul, it created significant early problems. The stringent sanctions (fines and prison sentences) for irregular migrants **led to thousands of foreign workers leaving Thailand**, similar to the 2014 exodus.³⁵¹ Also, not unlike the fisheries framework, the initial law was drafted with insufficient consultation with key stakeholders – this time without discussion with Thai CSOs or migrant leaders – leading to confusion, inconsistencies in implementation, and ultimately the need for revisions.³⁵² In response to these challenges, the Thai government responded quickly by suspending penalties for six months. Additionally, a 2018 amendment was passed that removed prison sentences and reduced fines.³⁵³

During 2017, the Thai government also changed other elements of the foreign worker management system, including a new verification process that allowed undocumented migrants to legalize, implemented in partnership

with Cambodia, Laos, and Myanmar. **Despite the inclusion of an “employer pays principle,” many migrants continued to incur high recruitment costs.** This was due to various loopholes, additional fees not explicitly covered (e.g., for passports, health checks, work permits), and the continued reliance on informal labor brokerage networks, which charged excessive fees.³⁵⁴

The provision tying work permits to specific employers also severely restricted workers’ freedom to change jobs, continuing to make them vulnerable to forced labor.³⁵⁵ In the fishing sector, this proved to be very harmful to employees who had regularized.

“Workers feel tied to their employer due to being legally documented; previously, they could ‘just leave.’ Fishers argued that now employers have to ‘talk to each other and agree’ or must ‘investigate their potential employees **to make sure that they do not belong to another employer.**”

From Boles, Tracking Progress, 2019

Once again, in a pattern similar to what occurred in 2014 and 2015, the Thai government shifted from an internally developed policy framework to partnering with international agencies to revise the laws. Working with the ILO, the 2018 revisions sought to address not just the penalties but also increased job mobility, clarified recruitment costs, and, through another law, mandated that fishers receive monthly wages via electronic transfers.³⁵⁶

Ratifying the ILO Work in Fishing Convention (C188)

In 2019, **Thailand responded to continued pressure from the EU, international retailers, the U.S., and the ILO** and ratified the ILO Work in Fishing Convention (C188), once again enacting and modifying laws to include the required changes. However, many interviewees observed that the ways the laws were modified ensured implementation would not be successful in part because of difficult relationships between different ministries.³⁵⁷

“At this point, we got an agreement to add forced labor to an anti-trafficking law (not ideal though, it’s better to separate them). The forced labor statute is hardly ever used because most of the civil servants don’t understand it and there was no significant rollout process to try to educate them about it. Also, forced labor technically falls into the realm of the Ministry of Labour, and human trafficking is held by different ministries, and these two fight like cats and dogs.”

INGO interviewee³⁵⁸

Despite their limitations, the new laws contributed to continued improvements in the system, including the ability to verify payments for workers and employment information.³⁵⁹

The international community acknowledged Thailand’s efforts in 2019. The United States upgraded Thailand to Tier 2 on its trafficking report in 2018 and kept it at Tier 2 in 2019³⁶⁰, while the European Union lifted its yellow card, recognizing substantive progress in combating illegal fishing.³⁶¹ These upgrades represented significant diplomatic victories for Thailand, protecting access to crucial export markets. The improvements also **decreased the pressure for continued improvements** and were widely seen by stakeholders in the study as a driver of lost political will, with recognition that decreased media coverage and political shifts happening in Thailand at the time also contributed to the subsequent decrease in progress.³⁶²

Private Sector Continues Reforms

Concurrent with the changes in Thai government policy, **the seafood and fishing export industry continued to reform its practices in response to and in partnership with international retailers and the Seafood Task Force.** The STF collaborated with a private company to develop an electronic traceability app, which, along with online payment systems, began to be implemented in Thailand.³⁶³ The STF also expanded its focus to include IUU and labor issues on tuna fishing vessels.³⁶⁴ Thai business associations agreed to implement the ILO Good Labour Practices program. Although it took time to get underway, it was ultimately seen as effective by some stakeholders.³⁶⁵

Mars Petcare launched their Sustainable in a Generation Plan, which incorporated environmental and labor rights commitments for their supply chain,³⁶⁶ and Thai Union adopted an Ethical Recruitment policy.³⁶⁷ Nestlé and nine other companies entered into a partnership with the Issara Institute to provide a grievance mechanism and pathway to remediate using Issara's Inclusive Labour Monitoring approach. It offered a pathway to not just surface grievances, but also to remediate them, with a hotline, a process for informing the employer, monitoring of whether the employer remedied the situation, and reporting to the global buyer if the situation is not remedied.³⁶⁸

By 2018, 23 of 28 global and Western buyers studied by Boles (2019) had public statements detailing their forced labor policies and procedures. The buyers were actively engaging with Thai producers to increase awareness and apply pressure for international labor standards, investing in research, supply chain mapping, third-party assessments, and partnerships with civil society organizations. Although not the norm across the industry, some of these practices were strong, including expanded due diligence, long-term commitments to Thai suppliers, ensuring direct hiring of workers, and even building compliance into the pricing model.³⁶⁹

Cross-Sector Collaboration

Cross-sector collaboration also continued during this time, with 2017 having many examples of INGOs and CSOs working directly with Thai suppliers and the Thai government, along with participating in the STF discussions.³⁷⁰ In 2019, Stella Maris and other Thai CSOs partnered with the Thai government to improve the implementation of the Workers' Compensation Fund.³⁷¹ In 2018, Thai Union, Nestlé, and the Thai government jointly developed a demonstration boat, seeking to show what it would take to meet the standards of the ILO C188. Vessel owners laughed at it, as it demonstrated they could not meet the requirements while still having their existing wooden boats.³⁷²

Pressure through CSOs, INGOs, and Worker Power Building

Perhaps the most significant process of change from 2017-2019 was the **dramatic expansion of civil society's role.** The capacity of Thai CSOs addressing human trafficking and forced labor had increased following the 2014-2015 crisis, as noted before, supported by increased funding from private philanthropic organizations and international actors that enabled more independent operations.³⁷³ Thai CSOs and INGOs kept pressure on the system throughout this period, with new organizations entering and a variety of significant actions in 2017 and 2018, including, among others:³⁷⁴

- Thai CSOs collected and presented data on workers' experiences, including through the *Falling Through the Net* report.
- Human Rights Watch released the Hidden Chains report and online video, including presenting it to the EU Parliament and gaining media coverage of the continued harms to workers in Thailand's seafood and fishing industries.
- CSO capacity expanded specifically related to legal advocacy, in part due to consistent philanthropic funding for legal strategies.
- The Migrant Workers Rights Network expanded its operations specifically related to seafood and fishing.
- Greenpeace and International Justice Mission established a Bangkok field office in 2017.
- Public actions by the CSO Coalition included events, press conferences, and joint statements with the Migrant Working Group.
- The CSO Coalition brought together labor and environmental organizations for joint actions.

The growing application of legal strategies among INGOs and Thai CSOs was evident in examples of successful prosecution during this period, including precedent-setting cases in 2019 focused on human trafficking and debt bondage in Kantang and Ao Noi, due to HRDF's litigation with funding support from the Freedom Fund.³⁷⁵ Cases like these set new legal precedents that recognized debt bondage as a form of human trafficking, demonstrated migrant workers could be co-plaintiffs and win cases, particularly with support from CSOs, and resulted in imprisonment for brokers, owners of vessels and piers, and even a security officer in the Kantang Case.³⁷⁶

Organizing Capacity in Thailand

Worker interest/participation in organizing and advocacy: According to the ILO 2017 survey responses, 10% of seafood and fishing workers had accessed training on labor rights, a service provided by various CSOs. Three percent reported getting support from a union of some type. Given the scarcity of trained workers, it's unsurprising that only 26% of those who experienced serious labor abuses sought help for the problem. Among those, half talked to their employers and 31% talked to a CSO. Although only 23% were part of some form of union or association, 61% wished to be.³⁷⁷

CSO organizing approaches and capacity: By this time, Thai CSOs had either begun and expanded their organizing capacity³⁷⁸ or continued to organize and were more visible in how they were organizing workers, in part due to an infusion of Western philanthropic resources.³⁷⁹ There is some disagreement in the data about whether this capacity was already present and better funded during this period or was largely developed during this time due to philanthropic dollars.

During this time, Western models of organizing were encouraged by some international partners, even as limitations on legal migrant organizing and collective bargaining remained in place in Thailand due to the 1947 law.³⁸⁰ **Organizations like MWRN and Stella Maris were actively organizing factory workers and fishers**, with worker groups forming in Mae Sot and Phang Nga.³⁸¹ The Fishers' Rights Network was formed in 2017 (and officially launched as a fishers union in 2018) with support from the International Transport Workers Federation (ITF), with a goal of having an independent fishers' union in Thailand despite the legal barriers.³⁸² Shortly after, FED formed the Transnational Food Processing Group with migrant workers and local communities, also seeking to organize workers.³⁸³

By 2019, **a tension existed between proponents of more Western, unionization-style models that would ideally be led by migrant workers themselves and CSOs that were supporting migrant workers to organize within their individual workspaces.** Interviewees from organizations based outside of Thailand shared concerns about the ability of CSOs to organize. At the same time, worker leaders in focus groups, CSO participants, and some international participants saw the organizing within specific workplaces as critically important and a way of building worker power and were not pleased with the impact of the attempts to use more Western models.³⁸⁴

2019: System Snapshot

By the end of 2019, Thailand's seafood industry had undergone a dramatic transformation following the 2014 crisis. The system that once operated as a perfect storm of exploitation had evolved into something more complex – a landscape where **genuine progress coexisted with persistent structural problems**, where regulatory frameworks for fisheries, labor more broadly, and foreign worker management had been rebuilt while fundamental economic and market pressures remained unchanged. In this landscape, the private sector continued to adopt new practices, yet evidence showed many harms to workers continued.

A New Regulatory Architecture

The most visible changes by 2019 came in the form of Thailand's legal framework. As explored, the government had embarked on an ambitious reform program, enacting sweeping new legislation in both fishing, seafood, and migrant worker management, as well as ratifying ILO conventions. **The legislation was being implemented through a significant and new regulatory infrastructure**, much of which had been underway for long enough by 2019 to be evaluated for its effectiveness. By 2019, USAID noted the "significant success" of the electronic traceability system implemented two years earlier³⁸⁵ even as other studies exposed the weaknesses of the PIPO system, which continued to fail to identify cases of forced labor.³⁸⁶ On the worker migration side of policies, the continued and significant changes in the system created confusion and difficulty for workers, with the passage of new regularization systems in the previous two years creating precarious and challenging situations for workers.³⁸⁷

Drivers of Forced Labor and Human Trafficking

However, by 2019, **the structural factors that had driven the crisis remained largely intact.** Poverty in Myanmar and Cambodia continued to push migration to Thailand, making workers vulnerable to exploitation. While legal migration channels had improved, the demand for cheap seafood continued unabated and measures to combat overfishing continued to put pressure on the system to allow for long-haul fishing trips to more distant waters.³⁸⁸

The system's success by 2019 was limited by these continued structural conditions and Thailand's failure to integrate migration policies into labor reform.³⁸⁹ Legal reforms had also left some problems untouched, including limitations on workers' ability to change employers, continued withholding of identity documents and ATM cards, limited rest opportunities at sea, and persistent systems of power and control over migrant workers.³⁹⁰

Indicators of Forced Labor

The 2017 systems snapshot above that explored worker experiences leveraged multiple reports including the 2018 ILO baseline report. A second report by ILO, released in 2020 but based on 2019 data, compared progress over the roughly two years between data collection points. Like their baseline report, the data was collected through interviews with workers (219 in fishing and 251 in seafood) and focused on the workers in larger seafood processing plants and vessels, which is where much of the reform efforts focused as well. The findings below are drawn from this report as well as two reports based on surveys and interviews conducted in 2019 by Oxfam and the CSO Coalition.³⁹¹

Overall, the findings indicate that **many things have improved in those two years**, and as noted above, there had been improvements between 2013 and 2017 as well. Improvements were greater for seafood workers overall, and yet **forced labor, as measured by the ILO indicators**, remains at roughly the same percent in fishing and in seafood (14% and 7% respectively) over the 2013-2019 period. In 2013, 17% of fishers were identified as experiencing forced labor. The ILO concluded that a specific number of vessel owners (and a smaller number of factories) have not adopted the reforms and continue to engage in serious abuses of their workers. In their study, the workers most affected were Cambodian and working along the eastern seaboard ports.³⁹²

However, the evidence does suggest a **significant downward shift in levels of violence** since the 2013 ILO study. In 2013, 17% of survey respondents had been threatened by violence and 10% had been severely beaten on boats, many of these on the long-haul vessels that are no longer permitted. By 2017, these threats of violence and actual violence had gone down (9% and 3% respectively). In the 2020 ILO study (2019 data), threats of violence and actual violence were almost gone (2% and 0% respectively).³⁹³

The end-line report also shows that workers are experiencing better work conditions. For example, **workers' salaries** have increased in both fishing and seafood (28% and 15% respectively). The ILO report indicates this has resulted in more than 90% of workers' salaries complying with minimum wage laws. The tight labor market and reforms in payment structure and transparency are credited for these improvements.³⁹⁴ A separate and smaller study found that **women specifically were not benefiting from wage increases** as fully, with more than 60% of women surveyed categorized as severely food insecure due to low wages. This same study by Oxfam also found that many on-land workers continue to be paid based on quotas and piece-rates, resulting in wages well below the legal minimum wage.³⁹⁵



Photo: © Stride, Josh/Humanity United. Fish at market in Thailand. 2016.

The ILO study found a decrease in the average work hours for fishers, from eleven to nine, and noted that some buyers are requiring this decrease from vessels in their supply chain. Another similar study, the Praxis Labs research conducted in 2018-2019, found similar numbers. Overtime pay does not apply in the legal structure of fishing in Thailand, but a significant increase in **overtime pay** was found in the ILO study for seafood factory workers, from 56% in 2017 to 84% in 2019.³⁹⁶ However, an Oxfam study found that seafood processing workers continue to work excessive hours and most without overtime pay. Others report taking any overtime hours they are offered due to the need for additional wages, resulting in workdays exceeding 10 hours.³⁹⁷

Changes in laws and practices related to recruitment fees may have decreased **debt bondage**, with 90% of migrant workers in the 2019 study reporting they did not pay any fees, as compared to 45% in 2017. However, it is also possible that these findings are related to a lack of transparency, as workers may not be aware of the fees being withdrawn. The significant improvement is credited to the movement to electronic payment systems and the ability to scrutinize payment practices (though another study found only 20% of fishers specifically are receiving wages electronically by 2019).³⁹⁸

Evidence from the ILO study also suggests that some employers will **withhold wages** at the end of a contract, claiming there are debts associated with recruitment that must be paid before the worker can retrieve their documents. This appears to be more of an issue in fishing than seafood processing factories and is enabled in part by the continued control over ATM cards by vessel owners, with 66% of fishery workers reporting no access to their cards (a finding that was duplicated in the Oxfam study³⁹⁹). Both fishing and seafood workers reported salary deductions monthly. The most common non-allowable deductions were for food and accommodation.⁴⁰⁰

Recognizing the issue above can limit access to documents, overall, far more workers reported they can **access their identity documents** as needed in 2019, as compared to 2017, with 97% of factory workers in 2019, as compared to 7% in 2017. For fishers, the number changed less, going from 30% in 2017 to 32% in 2019.⁴⁰¹

Some vessel owners and factories continue to **employ workers in abusive conditions**. For example, fishers interviewed by Oxfam reported going hungry at sea. Seafood processing workers reported their factory had only nine toilets for 1000 workers, and others reported limited and controlled access to water during workdays. These types of degrading and unsanitary work conditions were accompanied by threats of verbal abuse and lost wages for using sanitary facilities.⁴⁰²

Overall, while many of the drivers of worker vulnerability have remained and evidence continues to suggest workplace abuses continue, **by 2019, there is evidence to suggest that outcomes for workers are improving incrementally**. It is worth noting that regional disparities exist, with some Eastern region ports remaining significantly more problematic than other ports, and consequently, Cambodian migrants experiencing more significant abuses, as these are the provinces where they are more likely to be working.⁴⁰³

Corporate Complicity, Evolution and Contradictions

By 2019, Thai suppliers had undergone their own transformations, driven by mounting pressure from Western markets where compliance with international social and environmental standards became increasingly necessary for market access. Multiple buyers now sought similar standards, emphasizing that international requirements were becoming a growing market trend.⁴⁰⁴

The Seafood Task Force had evolved by 2019 to “drive oversight of seafood supply chains across Asia, mitigate risk, assure traceability, and improve social and environmental performances,” developing shared codes of conduct and financially supporting government vessel monitoring activities.⁴⁰⁵ Some companies had implemented genuinely strong practices, including expanded due diligence, long-term supplier commitments, direct hiring requirements, and even building compliance into pricing models.⁴⁰⁶

Yet the **industry’s fundamental contradiction remained unchanged**. Despite all these initiatives, corporations continued to pressure their supply chains for ever-cheaper seafood.

“Pushing social compliance initiatives down onto suppliers and thus increasing production costs while continuing to make sourcing decisions based on the cheapest price is an unviable business model.”

(Boles, Tracking Progress, 2019)⁴⁰⁷

Pressure for Change: Philanthropy

A critical moment occurred in December 2019 when a study commissioned by Humanity United interviewed 49 representatives across sectors and engaged 280 workers in focus groups, along with conducting an extensive document review. The findings **highlighted how the private sector continues to maintain the same business model**, one that does not include the cost of social and environmental compliance in the price of seafood. It questioned the effectiveness of private sector solutions and highlighted the lack of worker engagement in response to supply chain issues. Several findings included recommendations for the Seafood Task Force to adjust its practices, enabling it to more effectively fulfill its role as the primary mechanism for member companies to discuss and address forced labor in the Thai seafood industry.⁴⁰⁸ Participants in the STF reported that the study played a critical role in the next steps of the STF. As one stated, “STF was able to use that as a reference point and tool to explain to the membership that we need to have a more rigorous check on what is going on.”⁴⁰⁹

Pressure for Change: Thai CSOs

By 2019, **Thai CSOs had evolved beyond service provision and advocacy to take on active watchdog roles, holding both government and private sector accountable for implementing new systems.** They also continued to work directly with seafood processing companies, sometimes serving as third-party grievance systems for factories.⁴¹⁰ To assume this role, CSOs in Thailand developed new expertise in international human rights principles, advocacy, and collaboration with the private sector.⁴¹¹ The Thai CSO coalition had emerged by this point as an important voice, working directly with factories and owners while coordinating more effectively for collective action.⁴¹²

Pressure for Change: Worker Voice in a Constrained System

By 2019, the percentage of workers who joined an association or union had dropped to only 3%, but the percentage wanting to join remained high at 47%. CSOs at the time reported this drop made sense since they had seen a decline in organizing efforts by migrant worker associations and funding going toward other services. Most workers were also unaware of the organizations they could contact for assistance or to join.

Although the desire to join a migrant association had gone down, workers were much more likely to ask for help. Among those experiencing severe labor abuses (a much smaller sample this time), roughly three-quarters asked for help, almost all going to their employers. This is a reversal of the 2017 numbers.⁴¹³ Asking for help was not necessarily a solo exercise; workers were organizing together in their workplaces to address problems, advocating for improved conditions for themselves and others.

“ I’ve been working as a fisherman in Pattani for over 10 years. For about eight years, I’ve informally managed and supported fellow fishermen employed by a single employer. Although we haven’t formally organized into a group, I’ve provided dedicated support and coordination for this specific group of workers. ”

Migrant fisher leader focus group participant⁴¹⁴

Some international retailers/supermarkets and Thai suppliers began to commit to worker voice mechanisms, and by 2019, 89% of companies had worker grievance channels.⁴¹⁵ Some of these channels included third-party CSO organizations that received grievances from workers and brought them to factories or owners, including through the ISSARA Institute.⁴¹⁶ Other businesses established worker welfare committees, allowing worker grievances to be brought forward through worker representation.⁴¹⁷ However, these **grievance channels did not overcome worker reluctance to report issues** and did not include proactive consulting with workers on changes they wished to see in their workplaces.⁴¹⁸ The **fundamental power imbalance between workers and employers persisted, even within these new mechanisms.**

Pressure to Change: External Forces

From outside of Thailand, the U.S. government offered mixed messages, both upgrading Thailand on the TIP report and also revoking one-third of Thailand’s Generalised System of Preferences (GSP) benefit, which decreased tariffs on imports from Thailand including for seafood products, both fresh and canned. GSP eligibility was explicitly revoked due to “long-standing worker rights issues in the seafood and shipping industries.”⁴¹⁹

At the same time, with the release of the EU yellow card and only sporadic bursts of media coverage, much of the external pressure that launched the storm of activity in 2014 had declined.

Pressure to Not Change: Loss of Political Will

Near the end of this period, in March 2019, a general election was held in Thailand. Though much of the government remained the same, with a military-appointed Senate and Prayut Chan-o-cha elected as Prime Minister, the House of Representatives was elected by the people. By July, the military government was formally dissolved. Even with few changes to the leadership of the government the new government lacked the political will to sustain and expand reforms in the seafood and fishing industries. Key leaders left government agencies, and their replacements showed less interest in addressing reforms, instead listening to the advice of the National Fisheries Association of Thailand (NFAT).⁴²⁰

Thailand's seafood industry in 2019 represented a system in transition – no longer the unchecked exploitation machine of 2014, but not yet the reformed industry that advocates envisioned. Genuine progress in laws, monitoring systems, continued external and increasing internal pressure, and growing civil society capacity coexisted with persistent structural problems, corporate contradictions, and declining political will to act on needed changes.

Thailand's seafood industry in 2019 represented a system in transition – no longer the unchecked exploitation machine of 2014, but not yet the reformed industry that advocates envisioned.

Pressure for Backsliding: NFAT

NFAT had been advocating for rollbacks on reforms since they began, but by 2019, they had a more receptive government than early in the reform process. The association, representing 51 fishery organizations throughout Thailand, had little political support or access during the junta government from 2014-2019. Instead of directly influencing inside government, **NFAT had tried to subvert reforms, with vocal opposition, frequent complaints that reforms were biased against them, and even disrupting hearings related to the ILO conventions** in 2017-2018.⁴²¹

Some of their lobbying priorities in 2019 and prior were highly controversial, including campaigning for greater leniency to allow 16-year-olds to work on fishing vessels, advocating for reduced social security protection requirements for migrant workers, and demanding the removal of restrictions on crew and catch transfers at sea.

Interviewees and discussion groups expressed frustration at the level of influence NFAT started to gain in 2019 and continued to leverage over the next five years.

“*The big problem is that the National Fishing Association of Thailand never bought into the idea they did anything wrong ... Their argument is that previously they had a profitable, well organized fishing industry and the military intervened and they claimed illegitimacy of the coup government's policies and that it needs to be undone. None of the original boat owners were prosecuted, nor were brokers, the association, no-one. They should have gone to prison for forced labor, no one held accountable. The fishing association is claiming their sector was profitable, will be again if these regulations are removed. Lost in the midst are concerns about human trafficking.*”

INGO interviewee

2020-2022: How Change Happened

Just as reforms seemed to be taking hold, with worker outcomes improving and businesses and the Thai government implementing a wide variety of new practices, the COVID-19 pandemic disrupted everything. The **crisis created conditions for increased exploitation**, with Thailand's COVID-19 containment measures, immigration policies, and social protection programs discriminating against migrant workers and fostering conditions for seven ILO indicators of forced labor.

The Thai government's policies enacted from March 2020 to October 2022 to manage the pandemic, including containment, immigration, and social protection measures, were often rooted in structural discrimination against the

migrant population. This inadvertently heightened migrant workers' vulnerability to forced labor.⁴²² **Fishing workers were treated "like prisoners"** and cordoned off in barbed wire areas when their vessels came into port. Later, they were prevented from coming to shore at all, expected to offload fish without having access to land themselves.⁴²³ Migrant fishers suffered more workplace accidents due to excessive hours and were often denied personal protective equipment (PPE), sick leave, or medical treatment. Quarantine policies forced workers into unsanitary and crowded dormitories or vessels without sufficient food, water, or medicine, leading to hunger and poor sanitation.⁴²⁴

Migrants were also excluded from most government financial assistance programs, further increasing their vulnerability to debt bondage. During this time, **containment policies led to job losses and financial precarity**, leaving many migrants with little choice but to incur debt to cover living or travel expenses.⁴²⁵ Policies like "Bubble and Seal" required workers to remain on work premises and often compelled them to stay in undesirable or abusive jobs, restricting their freedom of movement. Interprovincial travel restrictions specifically limited migrants' mobility, unlike Thai nationals.⁴²⁶

During the COVID-19 pandemic, Prime Minister Prayut Chan-o-cha publicly blamed "illegal immigrants" from Myanmar for inciting the second wave of the pandemic, accusing them of bringing "much grief to the country." These words fueled an increase in anti-Burmese sentiment, leading to greater vulnerability for migrant workers.⁴²⁷

The suspension of formal Memorandum of Understanding recruitment channels eliminated a major legal pathway, encouraging the **proliferation of informal labor brokerage networks** that charged excessive recruitment fees. When the Thai government closed its borders, reducing the number of legal migrant workers and increasing the vulnerability of workers, an estimated 600,000 migrant workers lost their legal status entirely, while another 300,000 returned home, leaving behind a fractured labor system.⁴²⁸ In response to intense advocacy pressure, work permits were later extended for migrants whose documents had expired during COVID. The Ministry of Labour issued its latest Cabinet Resolution on 5 July 2022, allowing irregular migrants to extend their stay until February 2025.⁴²⁹

The already questionable **PIPO inspection system effectively collapsed during COVID** (though it did recover later), with inspectors no longer able to board vessels, foreign ship inspections stopping completely, and what remained of the monitoring system moving online, which resulted in "inspections" that were widely seen as ineffective or even pointless.⁴³⁰ Most vessels on the internet rating system showed up as "green" – at low risk of violations – and thus were not inspected at all, virtually or otherwise.⁴³¹

External Pressure on the System

Media pressure specific to the Thai seafood and fishing labor crisis was low, with so many other crises to cover. Yet, **moments of media coverage helped to maintain some pressure**. NGOs worked to maintain pressure through reports like the *Falling Through the Net II* report by Oxfam, Greenpeace's *High Cost of Cheap Tuna* report, a petition to Bumble Bee, the *Seabound 2.0* report, a report from the ILO on the outcomes for workers, and other reporting by CSOs on their observations during COVID.⁴³² Some of this led to media pressure; for example, the Associated Press picked up a story about Mars Petcare, which some interviewees suggest led to the launch of the corporation's human rights action plan. Other companies also continued or expanded their reforms, including supply chain mapping, seeking to avoid their own media backlash.⁴³³

The United States also downgraded Thailand from Tier 2 to the Tier 2 Watch List in the 2021 TIP report, Thailand downgraded to Tier 2 Watch List (TIP Report) in 2021 reflecting the decline in government commitment to addressing forced labor despite earlier progress.⁴³⁴ However, with the yellow card lifted and no signaling that it would return, the TIP downgrade did not have the same impact as it may otherwise have had.⁴³⁵

Thai CSO Capacity and Actions

Thai CSOs like MWRN, FED, RTF, and STM among others continued existing services and **expanded their emergency support**. They advocated for workers' protections during COVID, including taking a leading and successful role in advocating to ease rules for migrant workers so they didn't lose their legal status.⁴³⁶ During COVID, there were increased collaborations between businesses and Thai CSOs, with employers allowing CSOs into their worksites and engaging them in partnerships related to quarantine centers and field hospitals for workers.⁴³⁷

The Freedom Fund Hotspot program began the final phase (2021-2023 inclusive) of its program in this period, and activities were disrupted, with grantees and the Fund reporting nearly a 12-month delay in many of the activities intended to support a smooth wind-down of the Hotspot program.⁴³⁸

Worker Organizing Amid Crises

The **pandemic paradoxically catalyzed some worker organizing efforts**. Even as employers took actions that made things worse for their workers, some acted together to protect their own rights. For example:

“During COVID, things got especially tough. The factory didn’t say anything about what was happening. They only called when they needed us. That silence made us anxious, so we formed a group and started asking questions. The factory ignored us at first. But when our group grew, they began to take us seriously. We learned that power comes in numbers.”

Migrant seafood worker leaders focus group participant

“Later, during the COVID-19 pandemic, the factory prohibited us from crossing provincial borders and failed to transfer our wages. We collectively returned to the Provincial Labour Office to file a complaint. A translator at that Office encouraged us to accept jobs at a factory in Nakhon Pathom, but we refused. When the factory owner tried to intimidate us, we were asked if we were willing to file a lawsuit. We agreed, and in the end, all of us received the documents and backpay.”

Migrant seafood worker leaders focus group participant

New migrant-led organizations also emerged during this period, including People-to-People, a Myanmar migrant-founded group that provided capacity building and helped workers negotiate with employers during disputes.⁴³⁹ At the same time, others reported that worker organizing slowed down during COVID, with shifts to online trainings that interviewees deemed not as effective.

Private Sector Actions

Factories and owners in Thailand had to adapt to the crisis, including increasing in-country recruitment during COVID, as workers were permitted to stay in-country. They provided more emergency services to workers while also trying to meet a growing demand for shelf-stable seafood products. Brokers responded by shifting to working in-country and recruiting displaced workers, which offered lower costs than brokering across borders, but still incurred ongoing costs for workers.⁴⁴⁰

The larger Thai Suppliers and the industry associations (Thai Tuna Industry Association and Thai Frozen Foods Industry Association) **continued to advance a core set of reforms even amid disruptions**. Thai Union and CP Foods signed agreements by 2021 that included committing to paying a fair wage, along with other actions to improve labor rights. Ethical recruitment policies continued to be expanded among seafood processing companies, including some improvement in adopting the employer-pays principle for recruitment. In 2022, the two industry associations recommended that their members implement it by 2025/2026. These changes were in direct response to pressure from international buyers.⁴⁴¹

But these commitments often proved hollow. As one observer noted, the *“Employer Pay Principle largely [was] not implemented” because “contract prices and purchase practices didn’t change.”* International buyers made ethical commitments without factoring in the associated costs, creating an impossible situation for suppliers caught between moral expectations and economic reality.⁴⁴²

Regionalizing the Problem and Solutions

The **Seafood Task Force expanded their focus to include other countries** during this period, specifically allowing membership of Indian and Vietnamese companies. The ILO Ship to Shore project expanded its focus from Thailand to Southeast Asia. This regionalization aligned with the thinking of **Humanity United and the Freedom Fund, which had adopted a similar regional approach shortly before the STF and ILO**. The approach was grounded in the concept of the “encircling effect,” where tackling the problem in one country alone could not solve the problem, given the ease with which the global market can shift its purchasing to other countries.⁴⁴³ Another frame used to explain

the need was the importance of leveling the playing field and recognizing that buyers could currently move easily from one country to another, avoiding addressing the root causes of labor exploitation.⁴⁴⁴

The need for this regionalization was in part signaled by decisions major international retailers had already made to switch their sourcing of shrimp to other countries. As noted earlier in the report, this transition had many different causes tangled together, some of which were the increased costs, reputational risks, and challenges of sourcing from Thailand, given both the exposure and reforms underway. It was also necessary to address the regional supply chains. For example, tuna fishers from one country in the region might be on boats fishing in waters in another country and ultimately deliver their product to be processed in yet another. This makes it impossible to say a product is free of forced labor and human trafficking without having addressed the issue across multiple countries. Expanding the STF and philanthropic funding strategies to include a larger number of countries was a logical next step to address these complex supply chain dynamics. It also offered a new way to place pressure on individual countries, leveraging regional market dynamics as another source of pressure on Thailand (and other countries in the region).⁴⁴⁵

However, multiple discussion groups and interviewees talked about the **risks as well as the benefits associated with the regional focus**. The STF expansion is perceived to have led to less bandwidth to focus on Thailand, and thus less pressure to continue reforms during a time when backsliding was at risk.⁴⁴⁶ The expansion of the HU strategy was acknowledged as both strategic and a good response to the international dynamics in the market,⁴⁴⁷ and seen as putting at risk the durability and sustainability of the alliances and networks among CSOs and INGOs that had been nurtured for the previous six years.⁴⁴⁸ Relevant to both the STF and the funders, stakeholders raised questions about whether the approach that worked in Thailand (or had worked, until backsliding began) was possible in other countries.⁴⁴⁹

From COVID to Coup

In February of 2021, a coup d'état began in Myanmar, with declarations that the 2020 elections were invalid and the installation of General Min Aung Hlaing as the head of the government. The **Myanmar coup fundamentally altered migration patterns and worker vulnerability**, leading to a significant increase in migrant workers from Myanmar, even as migration challenges increased and the Thai/Myanmar MOU system came apart.⁴⁵⁰ The collapse of the MOU system pushed migrants back into informal channels, increased reliance on middlemen and exploitative recruiters, and ultimately increased worker debt and vulnerability. Myanmar sets requirements for migrants related to taxes and via renewal in the country only, forcing workers to return to Myanmar to renew documentation, an action many were unwilling or unable to take, putting them in a legally precarious position.⁴⁵¹

The coup also created an influx of immigrants from Myanmar, making it a buyers' market for workers and thus taking power out of their hands, while simultaneously helping fishing boats secure labor that had previously been difficult to find. According to worker leaders in focus groups, the situation also **altered hiring dynamics, as more migrant workers opted to stay in Thailand and switch between jobs rather than return to their home country**.⁴⁵²

Political Backsliding and Continued Progress

In 2019, the shift in political structure and leadership within the Ministries began the process of eroding political will to sustain and strengthen reforms. The disruptions of 2020 and 2021 had little impact on this. The period coincided with Thailand's continued decline in global seafood rankings, with Thailand's seafood exports falling to just 13th in the world, down from third in 2012, with a value of \$5.4 billion.⁴⁵³ Reduced political will and appointment of industry-connected individuals in key Thai government positions led to proposed rollbacks of some reforms.

Although many of the reforms have remained, policymakers have reversed some hard-won protections. For example, in 2022, Thailand's Ministry of Labour quietly passed new regulations allowing minors from 16 to 18 years to work on fishing vessels – a direct rollback of child labor protections that advocates had fought years to establish. This change came after sustained pressure from the National Fisheries Association of Thailand (NFAT), whose influence had grown as political will for reform weakened.⁴⁵⁴

The government's declining commitment was evident in other ways too. **Political appointments increasingly favored industry-connected individuals over reform advocates**, and Thailand failed to address fundamental structural barriers like the Labour Relations Act that continued to prohibit migrant workers from forming unions.⁴⁵⁵

Even with the pressure to roll back some policies, other signals suggest a continued commitment to implementing critical reforms. Criminal justice actions against Thai businessmen continued, with convictions even for more powerful individuals. The legal frameworks established over the previous six years provided the necessary

framework for these legal processes to succeed in convictions. Additionally, CSOs reporting during this time suggest that workers are more consistently reporting that they see evidence of government oversight in their work environments.⁴⁵⁶

The New Normal – 2022

By 2022 and leading into 2023, there were growing concerns that a new Thai government might consider rolling back or narrowing key fishery laws and labor protections. Study participants suggest this was largely driven by lobbying from small business vessel owners who advocated for a relaxation of laws related to illegal, unreported, and unregulated (IUU) fishing and labor exploitation.⁴⁵⁷

However, 2022 was also a year when additional protections were put into place specifically related to human trafficking. The Thai Ministry of Labour regulation Concerning Labour Protection in Sea Fishery Work 2022 was passed, with improved protection via employment contracts.⁴⁵⁸ Amendments to human trafficking laws and the adoption of the Thai National Referral Mechanism by the Anti-Human Trafficking Commission provided improved frameworks for identifying, assisting, and compensating victims of human trafficking. As a result of the new policies, victims of human trafficking on fishing vessels were able to file for compensation from the assets seized by the offenders.⁴⁵⁹ The National Committee on Fisheries Policy had also approved a 2020-2022 fishers management plan and granted 2.82 billion baht to rehabilitate the livelihoods of 188,134 fishers.⁴⁶⁰

Overall, the 2020-2022 period represented more than just a temporary setback – it revealed how quickly hard-won progress could begin to unravel when multiple crises converge with declining political will. The pandemic exposed the fragility of reform systems built without adequate implementation and resources, and without strong social and political will to sustain them. The Myanmar crisis demonstrated how regional instability can undermine even well-intentioned bilateral agreements, shifting power into the hands of employers as the influx of workers overwhelmed the system.

For the workers at the center of these systems – organizing in tuna factories despite employer silence, building mutual aid networks in the face of government neglect, and continuing to advocate for their rights even as legal pathways narrow – the period stands as a testament to their resilience and the commitment of Thai CSOs to continuing to support them even through crisis.

2023-2024: How Change Happened

During the final period, 2023-2024, the context in Thailand was a mix of decreased political will, risk of backsliding, recalibrating reforms to respond to ongoing industry challenges, and at the same time, **many significant moments that demonstrated the success of the reformed system** including how Thai CSOs are able to leverage the laws and pressures from the international market to advance reforms at home.

Multiple legal cases supported by Thai CSOs were successful, each leading to increased visibility and shifts in the implementation of policies. Although some INGO partners considered the Thai CSOs overly focused on legal advocacy and wanted them to focus more on preventing harm,⁴⁶¹ these cases help demonstrate that **legal strategies can serve as systems change tools**. They included:

- In June 2023, a vessel owner and employer were found guilty of trafficking Thai fishers onto Malaysian vessels. The court ordered the employer and the vessel owner to pay THB 500,000 (approximately U.S. \$14,000) compensation to each fishery worker, in addition to sentencing the defendants to significant periods of imprisonment. This case was supported by the Freedom Fund and involved Stella Maris and the Human Rights Development Foundation, both part of the hot spot. The case focused on seeking remedies for Thai fishery workers in overseas and distant water fleets. It was a landmark court ruling that recognized a recruitment agency as an employer under the law.⁴⁶²
- Also in 2023, a landmark judgement convicted a vessel owner for the deaths of three fishery workers. Hotspot partners played a critical role in this case, and their significance went beyond holding the vessel owner accountable. The Thai government responded by updating PIPO inspection and training manuals.⁴⁶³
- Thailand's Labour Court also ruled against a recruitment agency in a case of unpaid wages for workers they sent to a Somali vessel. This case set an important precedent, that the recruitment agency was considered the

employer under the law and that workers employed by a Thai company on boats in foreign waters can still sue within Thai courts.⁴⁶⁴

During this time, **Thai CSOs continued to support workers to negotiate for improvements** within their own workplaces. Among many other examples:⁴⁶⁵

- The Raks Thai Foundation and the Pattani Fishery Workers Group negotiated agreements with 52 vessel owners, improving working conditions for about 1,200 fishers in Thailand.
- LRF/MWRN, in collaboration with other partners, successfully negotiated collective bargaining agreements in 12 seafood factories in Thailand and supported collective action in other factories.

These successful prosecutions and negotiations within specific workplaces highlight the continued presence and significance of labor and human rights issues within the supply chain in Thailand. Some study participants suggest that this is evidence that the problems continue, while others point out that the successful negotiations with employers and the responses in the courts look quite different than those in earlier years, suggesting there is **greater ability to hold those accountable who directly act in ways that harm workers**.⁴⁶⁶

Despite these wins, the 2024 U.S. Trafficking Report identified that although courts were ordering restitution and compensation for victims, little follow-through occurred to ensure companies paid as required. Additionally, defamation cases against advocates, victims, and even government officials who investigated cases continued to be filed by companies, resulting in legal harassment even if not convictions. This **continued to create a culture of intimidation for advocates and risks deterring both advocates and victims from advancing cases**.⁴⁶⁷

Although much of the focus of international attention on the Thai government in 2023-2024 was on the risk of backsliding, some positive changes also occurred during this time, often with significant Thai CSO advocacy leading up to them, including the Thai government:⁴⁶⁸

- Issuing a series of resolutions for the management of migrant workers, allowing irregular workers to regularize and repeatedly extending the deadlines in 2023. This led to more than 1.7 million migrant workers regularizing their status.
- Raising the minimum wage.
- Issuing orders requiring employers to make retroactive contributions to the compensation social security fund.
- Reducing visa fees significantly, from THB 1,900 to THB 500.
- Issuing new regulations focused on labor inspectors and criminal sanctions against those who violated the Work in Fishing Act.
- Allowing for easier access to the fisheries workers' compensation fund with payments via postal money order and state-owned banks.

Notably, many of the positive changes enacted by the Thai government were related to human rights and migrant rights issues more broadly, benefiting workers across industries (e.g., reductions in visa fees, work permit regularization, improved access to social security, enhanced ethical recruitment policies and practices, establishment of Migrant Worker Resource Centers, etc.).⁴⁶⁹

The pressure placed on the Thai government to reform migration practices due to highly visible and publicized harms in the fishing and seafood industry ultimately led to improved conditions for workers in many industries.

On the private sector side, changes continued that signaled the retailers and suppliers' ongoing commitment to reforming practices, including the articulation of new industry expectations, adoption of new policies, and some changes in the actual practices of private sector companies. They included:

- **All existing and new STF members demonstrated traceability in their farmed shrimp, wild-caught tuna, and marine ingredient supply chains**.⁴⁷⁰
- STF approved and published an Environmental Code of Conduct with training materials for its members.⁴⁷¹
- The STF implemented a Tuna Audit Framework program, introducing a Self-Assessment Questionnaire and an Assessment Checklist.⁴⁷²

- More seafood processing companies in Thailand adopted the employers pay principle (a pattern that had started in 2022 and continued), credited in part to the work of the CSO Coalition, the early adopter evidence from Thai Union, and the support of Hotspot partners like LRF and MRWN.⁴⁷³
- MWRN and Thai Union worked together to implement changes including improving monitoring mechanisms and continuing to improve recruitment practices.⁴⁷⁴
- Bumble Bee Foods agreed to remove false labor claims from marketing after a lawsuit settlement filed by GLJ-ILRF, signaling the importance of accurate labor claims.⁴⁷⁵

Many of these continued improvements and commitments in the private sector included cross-sector collaborations. This **culture of collaboration continued throughout 2023-2024, with ongoing partnerships and new ones launched.** The *Wi-Fi Now for Fishers' Rights!* campaign was launched in 2023 and represented a collaboration between international INGOs and labor rights groups with in-country CSOs in Thailand and Taiwan.⁴⁷⁶

Unfortunately, even as these significant improvements and wins continued to signal that revised legal and business practices had been adopted in Thailand and the global supply chains, the lack of political will was hard to ignore. The 2023 democratic elections led to the end of the Prayut era of the Thai government. During the pre-election period, all the major political parties in Thailand campaigned to roll back key fishery laws.⁴⁷⁷

Discussion groups widely acknowledged that **NFAT was a major contributor to the loss of political will** and the specific rollbacks being proposed in 2023 and 2024. The association had influence with politicians, particularly the Move Forward Party, and proposed changes that would allow at-sea transshipment, weaken penalties for IUU fishing, permit child labor, and extend fishing days, among others.⁴⁷⁸ **Interviewees emphasized that NFAT was always there, playing a role behind the scenes, donating to political parties, and laying the groundwork for the rollbacks to begin.**⁴⁷⁹ Not unlike the complaints made by NFAT at the beginning of the reforms, interviewees complained that the government leaders who sought to revise the laws as of 2024 lacked sufficient understanding of the industries and the issues and did not know what they were doing.⁴⁸⁰

External Pressure and Examples of Failures

One of the external levers that may be able to reinvigorate political will comes from the negotiations with the EU on a Free Trade Agreement (FTA). The Thai Tuna Industry Association, the Thai Petfood Trade Association, and multiple industry associations for frozen seafood products from Thailand are all advocating for Thailand to negotiate successfully for the FTA. They do not want to see the laws on forced labor in the seafood industry rolled back, as they recognize it will affect their profitability and access to export markets. The FTA negotiations explicitly included labor and human rights; however, they have been inconsistent, stopping and starting, which may have limited their impact on the concurrent internal conversations around rollbacks.⁴⁸¹

“While other issues, such as tariff rates, intellectual property rights, digital trade, rules of origin, as well as transparency will also occupy significant aspects of the FTA’s negotiation, the twin questions of IUU fishing and the EU’s related human rights concerns regarding the Thai fishing industry’s treatment of migrant workers will not only be a major focus, but will draw significant international attention and scrutiny.”

Cogan, EU-Thailand FTA Negotiations, 2024⁴⁸²

The EU’s adoption of Human Rights Due Diligence Legislation and the subsequent exploration by Thailand of its own HRDD was also seen by discussion group participants as an important moment when pressure for change may have decreased the backsliding. However, the lack of follow-through from the EU diminished the value of this external pressure.⁴⁸³

Studies released in late 2022 and through 2024, as well as feedback from study participants, demonstrate that the Thai system does need to continue to reform to address forced labor and human trafficking in the fishing and seafood systems.⁴⁸⁴ The U.S. TIP report in 2023 highlights concerns, including the results of the SWG report, but ultimately does not change Thailand’s ranking.⁴⁸⁵ EJF’s High and Dry report further explains the issues facing the system, including the need to reform the PIPO process to enable supply chain reform efforts to succeed:

“ One of the most pressing concerns affecting the day-to-day MCS of Thai fisheries is the lack of consistent implementation of fisheries laws and regulations by PIPO officials. This issue is especially pertinent as PIPO centres have recently had their roles and responsibilities expanded to encompass both domestic and foreign vessel inspections and will soon be rebranded as Port Security Control Centres (PSCCs). ”

From EJP High and Dry, 2023

Some of the key tools being used by international retailers to assess evidence of human rights violations in their supply chains were also being questioned. The Marine Stewardship Council's certification process (an important tool in the IUU space) continued to be seen by some as a tool for identifying human rights and labor abuses, even as many advocates questioned whether this certification or other similar tools can be implemented in ways that reveal abuses.⁴⁸⁶

Market Drivers of Forced Labor Remain

Although the commitments being made by individual companies and at the Seafood Task Force are promising during this time, the flip side of that coin is that in 2024, global retailers continued to place expectations on suppliers to implement required practices without providing financial assistance, increasing purchasing prices, or even providing technical assistance to figure out how to meet the expectations. This has prompted suppliers to turn to INGOs and CSOs for assistance, as well as incomplete implementation of requirements like zero-fee recruitment systems. It also creates an incentive for suppliers to limit transparency into their recruitment practices, fearing consequences for incomplete implementation.⁴⁸⁷

“ Many buyers have tried to put pressure on us. For example, [company name removed at interviewee's request] told suppliers recently that they need to have zero fees in their recruitment system. Now their suppliers are panicking — it's not entirely achievable in a cross-border system due to lack of transparency into what happens on the other side of the border, and no financial support. ”

INGO interviewee⁴⁸⁸

“ We can't do anything with relation to price through the Task Force. It's not an option through that forum. That would be illegal, so we don't even go that route. ”

International private sector interviewee

This inability to discuss fair pricing collectively within the STF is seen as a core barrier by multiple interviewees, leaving no opportunity to have frank conversations about purchasing practices and how to accommodate the costs of a supply chain free of forced labor and human trafficking.⁴⁸⁹ Not all interviewees and discussion group participants agree that anti-trust laws prevent these conversations from happening legally and see some openings emerging to begin these dialogues.⁴⁹⁰

This inability to discuss fair pricing collectively within the STF is seen as a core barrier by multiple interviewees, leaving no opportunity to have frank conversations about purchasing practices and how to accommodate the costs of a supply chain free of forced labor and human trafficking.⁴⁸⁹

2024: Systems Snapshot

It is difficult to understand the current state of the system from the perspective of workers, and particularly by comparing to previous points in time, due to non-comparable information. The ILO completed three studies from 2013 to 2020, but the methodologies, analytical frameworks, and detail in reporting vary. A fourth study, part of the larger Ship to Shore project effort released in 2024, includes both comparable and non-comparable measures. Other studies employed quite different approaches, sometimes yielding significantly different results, ranging from focus groups only to surveys with limited open-ended questions.

Indicators of Forced Labor – Signals of Improvements

The ILO study findings suggest that the **systemic changes have continued to improve conditions for some workers**, but not all. Quite a few of the outcomes for seafood processing workers specifically appear to have improved, with 100% of seafood workers in processing plants being at minimum wage or higher, 73% having signed work contracts (compared to only 39% in 2017), and 61% not paying any Thailand recruitment fees (compared to 43% in 2017). Most significantly, only 1% of seafood processing workers in the study showed signs of forced labor using the ILO's approach to calculating it.⁴⁹¹

Indicators of Forced Labor – Signals of Increasing Challenges

Unfortunately, several findings from the 2024 ILO study suggest that conditions are deteriorating for fishers. Forced labor was identified at 17% in the ILO 2013 study and went down to 10% in 2017. However, by 2024, the ILO study once again found it higher, with 18% of fishers being identified as experiencing forced labor.⁴⁹² Only 50% of fishers reported having wages at minimum wage or higher, compared to 84% in 2020. Little change was seen in withholding or receiving at least monthly payment.⁴⁹³

Across both seafood processing and fishers, a common pattern held that workers are being asked to work longer hours with less safe conditions. This aligns with the broader narrative of the shift that occurred during COVID and, more significantly, with the influx of workers following the Myanmar coup, making it easier for employers to find workers who will work under their terms.⁴⁹⁴ Average work hours for fishers have gone up, from 11 to 13 hours, and for seafood processing workers from 10 to 11 hours. Fishing workers are now working 6.6 days on average, up from 6.3 in 2017. Fishing workers are less likely to have signed a contract, with only 29% reporting they had, compared to 43% in 2017. Injuries requiring medical attention have also increased, with 48% of fishing workers and 30% of seafood workers reporting this, representing a rise of over 15% since the 2017 survey.⁴⁹⁵

Despite extensive efforts to address recruitment fees being passed on to workers, a survey of fishing and seafood workers in 2022 found that 87% of workers paid recruitment fees in their country of origin, 39% in Thailand, and 59% took on some form of debt to pay the fees (some with employers, but other loans through friends and family).⁴⁹⁶ This is significantly lower than the ITF/FRN study, which was specific to fishers, which found 87% of fishers are in debt to their employers.⁴⁹⁷

Another signal of the system getting worse is the decrease in migrant workers who showed indications of forced labor seeking assistance, down to 27% from over half. Similar to before, half continued to negotiate with their employers directly.

A study specifically of Cambodian migrant workers in Thailand (but not specific to fishing or seafood) conducted in 2024 included a focus group with fishers and another with seafood workers. They found that poor health and safety conditions continued to be an issue for Cambodian workers on fishing vessels, along with difficulty accessing payment through ATMs. Workers also reported that they were threatened to prevent them leaking information to PIPO officers about job conditions.⁴⁹⁸ Fishing vessels continue to be places where workers face **intimidation, threats, physical violence, restriction of movement, and excessive overtime**.⁴⁹⁹

“The conditions are so bad. But we can barely find a lawyer to do even the major cases. And when we make a complaint ourselves to PIPO on a fishing case, the details are always leaked to the vessel owner and then the worker who made the complaint is threatened, intimidated and often beaten.”

CSO discussion group participant

Similar to the focus group with Cambodian migrant workers, the ITF and FRN study found that 51% of fishers said they have not reported abuses due to a lack of trust in Thai authorities. While PIPO interventions have occasionally helped with document recovery, they fail to consistently protect victims from retaliation, leaving many still fearful and unprotected. The ITF/FRN study also found many fishers lack transparency around employment terms — 94.1% received no receipt for document-related fees, and 87.7% reported not being paid the wages promised in their contracts. This study found that **retention of identity documents** continues to be a problem, with 84% of fishers reporting their passports, work permits, identity certificates, employment contracts, bank cards, and/or bank books are held by the vessel captain or owner, with workers being given the documents specifically during PIPO inspections and otherwise not having access. These numbers are drastically higher than previous studies have found, which may be the result of differences in methodology or the sample of workers surveyed. For example, the 2017 ILO findings identified that one in three (33%) of fishers lacked access to identity documents.

Indicators of Forced Labor – Mixed Findings

This study's analysis of the 10 years of change study did not attempt to determine population outcomes directly and focused instead on systemic changes. Yet, among the worker leaders and CSOs, many talked about **a system that has improved for workers, both over the last 10 years and even in the last couple years:**

“A noticeable turning point came in January 2023, when factories – especially those affiliated with companies like Thai Union, Pattani Seafood, and Unicord introduced reforms focused on safety, transparency, and worker empowerment.”

Migrant seafood worker leaders focus group participant

Some CSO leaders in the discussion group described a system that has improved, not just in identifying victims, but also in preventing crimes against workers. “In recent years, the system has improved, which has helped reduce the number of missing workers and enhanced crime prevention. Having proper documentation and a stronger system in place has played a key role in protecting workers and preventing criminal activities more effectively.”⁵⁰⁰ Yet, many challenges remain. CSO leaders reported that workers are frequently employed in roles not matching their official documentation, violating labor regulations. This misalignment suggests **deceptive practices** in job allocation and a lack of transparency in recruitment processes.⁵⁰¹

“Workers often hold one type of official work permit, but in reality, they are assigned to do different jobs than what the permit allows.”

CSO discussion group participant

Yet, even with these improvements, the system remains set up to harm workers. For example, **restriction of movement** continues to be an issue for workers both in the context of their jobs and also when they go through legal proceedings and are placed in long-term shelters as victims. The Ministry of Social Development and Human Security operated 77 short-term and nine long-term shelters to house victims across different industries. Many of the shelters impose restrictions on victims' freedom of movement, often requiring them to remain throughout the duration of legal proceedings unless they have received permission to leave the shelter only for work outside the shelter. While these limitations have persisted, some shelters began adopting trauma-informed care, and the government initiated a review of shelter protocols to improve victim support and well-being.⁵⁰²

Other forms of restriction happen on the job. On fishing boats, vessel owners commonly **confiscate identity documents**, further limiting victims' ability to leave or seek help. While some document recoveries occurred through PIPO interventions, studies have shown these are isolated and typically required NGO pressure, indicating limited systemic progress.⁵⁰³

“These workers cannot move to land-based jobs; they must remain exclusively within the fishing ports or engaged solely in fishing activities.”

Vessel owner interviewee

“ *New workers often have no clear understanding of how to live and work onboard... they rely on mentoring from other crew members.* ”

Vessel owner interviewee

Advance payments function as de facto withholding; repayment expectations are not formalized. Though workers ask for advances, these arrangements trap them financially. If they leave, they may lose both work and outstanding pay.

“ *Advance payments... continue... Legally they're prohibited, as the law views them as forced labor or bondage.* ”

Vessel owner interviewee

The snapshot of worker experiences as of 2024 is very mixed, with clear evidence of continued abuses, unclear evidence of how widespread they are, and some evidence of continued improvements.

Systemic Changes – 10 Years Later

As explored in the process of change, by December 2024, the Thai seafood and fishing industries were at a critical juncture. Past reforms had significantly changed how the system functioned, yet persistent abuses made it clear the problems were not yet resolved. Loss of market share and powerful advocacy by NFAT convinced elected leaders that reforms needed to be revised or removed; at the same time, industry associations representing export businesses advocated for reforms to continue, not retreat, alongside INGOs, Thai CSOs, and other international actors.

Despite the advocacy to protect the reforms in the system, specific legislative revisions passed first, second, and third parliamentary readings as of Dec. 28, 2024. They included returning to transshipment of crew and fish at sea being allowable (the banning of which was a significant early win for advocates), reducing the minimum wage for workers on vessels, reducing monitoring, control, and surveillance requirements, including the VMS system requirements, eliminating vessel crew lists requirements, and reducing penalties associated with IUU fishing. Study participants were mixed on the implications of these proposals, with **some describing them as necessary recalibrations**⁵⁰⁴ **while most described them as detrimental rollbacks.**⁵⁰⁵

One signal of **positive and significant influence by INGOs and CSOs, combined with industry associations**, was a set of revisions to the final draft. A letter to the Prime Minister in March 2024 from the EJF and many partners called out 18 articles in the proposed law that were problematic. Out of these, 15 were removed by the time the law went through its third reading. The negotiation of the at-sea transshipment proved to be contentious, and the final version contained permissions, but with more regulation and limitations than NFAT originally proposed.⁵⁰⁶

Beyond external pressures and government requirements, evidence suggests that internal incentives also play a significant role in sustaining positive changes in Thailand's seafood sector. Companies increasingly recognize that maintaining competitiveness requires proactive investment in compliance systems, worker training, and effective traceability. Institutional changes, such as establishing worker welfare committees and empowering migrant workers, further embed these improvements.⁵⁰⁷ However, challenges persist in integrating small-scale operators due to limited resources and shrinking market leverage.

The background image is a photograph of a large industrial warehouse. The floor is covered with numerous stacks of cardboard boxes, some of which have Thai text printed on them. Several workers are visible in the background, moving through the aisles. The warehouse has a high ceiling with a complex steel truss system and long fluorescent light fixtures. The overall scene suggests a busy logistics or manufacturing facility.

Section 4: Cross-Cutting Conclusions

Photo: © Stride, Josh/Humanity United. Catch at port in Thailand. 2016.

As noted at the beginning of the report, Humanity United and the Freedom Fund sought to answer seven core questions through this study. The answers are below, weaving together the findings from the previous three sections.

Question 1: Population Level Impact

How prevalent and severe is forced labor and human trafficking in the Thai seafood and fishing industries today compared to 10 years ago?

The prevalence and severity of forced labor in Thailand's seafood and fishing industries presents a complex picture when comparing today to 10 years ago. There have been **significant improvements in some areas, particularly for seafood processing workers**. The fishing sector has improved in important ways as well, but still forced labor has remained stubbornly present.

In 2014, Thailand's seafood industry was described as "globally notorious for being one of the most abusive and destructive economic sectors in the world,"⁵⁰⁸ with a study of 49 workers showing that 94% had no employment contract and many of those workers reporting they had witnessed a murder at sea. These types of damning statistics helped to bring visibility to the issue.⁵⁰⁹

By 2024, studies conducted by the ILO suggest that **forced labor among seafood processing workers has dramatically decreased to just 1%**, with 100% earning minimum wage or higher. However, the fishing sector tells a different story – forced labor rates had improved from 2013 to 2017 (going down from 17% to 10%) but have now returned to previous levels (reported at 18% as of 2024), suggesting that **gains made during the reform period may be eroding**.⁵¹⁰

The **severity of abuses has generally decreased**, particularly regarding extreme violence. The ILO reported that threats of violence dropped from 17% in 2013 to just 2% in 2019, and workplace violence fell from 10% to nearly 0%.⁵¹¹ The systematic executions, torture, and forced methamphetamine use that characterized the 2014 period are no longer widely documented in the studies, though some CSOs continue to report that this type of abuse is present and undocumented.⁵¹² Other indicators remain more concerning, though the data in recent times is complex to compare to past surveys due to significant differences in methodology and the framing of questions. With that caveat, the most recent data suggests that up to 84% of fishers still report having their identity documents withheld (compared to 33% in 2017), and 87% are in debt to their employers.⁵¹³

Overall, while the research suggests that the most extreme brutalities have been mostly eliminated and seafood processing (particularly in the direct export part of the industry) has seen remarkable improvements, forced labor in the fishing sector (which exports only indirectly) remains a significant problem. The fishing industry appears to have **moved from a system characterized by extreme violence and physical control over workers to one where economic coercion, document retention, and debt bondage are the primary tools of control**. Additionally, the documentation of abuses in seafood primarily focuses on export-facing parts of the supply chain, where pressure for reform was strongest. Domestic-facing parts of the supply chain may experience worse conditions.⁵¹⁴ Finally, recent factors, including COVID-19 and the influx of workers after Myanmar's coup, created conditions in both industries (fishing and seafood) that may be reversing some of the progress made, with working hours increasing for both and safety conditions deteriorating for fishing workers specifically.

The disparity in outcomes between the seafood processing industry and fishing vessels was driven by a variety of factors, including fundamental differences in market proximity to international buyers and the associated financial incentives to comply (*Condition 6 - Market Dynamics*), which led to the lack of motivation for change by vessels owners even as other private sector actors were motivated to improve (*Condition 3 - Stable Motivations for Change*); the implementation of the policies, both in terms of effectiveness and consistency (*Process E - Consistency of Implementation*), and the inherent isolation workers experience when on fishing vessels. However, another driver of the differences is the very different starting points. The legal frameworks governing labor in processing factories were more established as of 2014 than the legal frameworks for fishing vessels and factories were already working to comply.⁵¹⁵

Question 2: Formal Systems Changes

How have government, private sector, and civil society formal requirements and behaviors that contribute to or decrease forced labor and human trafficking changed over the past decade?

The formal systems governing labor practices and migrant workers' rights in Thailand's seafood industry have undergone dramatic transformation over the past decade, though with uneven implementation and recent concerning reversals. Drawing from the conditions for change, processes of change, and temporal analysis, three key patterns emerge in how formal requirements and behaviors have evolved. For a more comprehensive view of the range of policy and practice changes that occurred in the government, private sector, and civil society sectors, see Section 3.

Government Legal and Regulatory Transformation: The Thai government implemented the most comprehensive legal overhaul in the industry's history, doing so rapidly between 2014 and 2019. As documented in *Process of Change A (bold and dramatic early actions)*, the military junta's ability to act unilaterally enabled the rapid passage of sweeping reforms, including the Port-In/Port-Out (PIPO) inspection system, 30-day vessel limits, transshipment bans, electronic traceability systems, and ratification of ILO Convention C188. The government also overhauled foreign worker management laws, established Migrant Worker Assistance Centers, and created new anti-trafficking mechanisms. However, the analysis reveals that *Process of Change E (implementation of change was incomplete, inconsistent, and under-resourced)* characterized the entire decade. The PIPO system, despite conducting tens of thousands of inspections, largely failed to identify forced labor cases due to structural problems, including underfunding, lack of training, language barriers, and corruption. A variety of other reforms also struggled to be implemented successfully, as captured throughout the timeline section.

As noted previously, the rapid reform process also lacked buy-in early on and ongoing from powerful stakeholders, particularly in the fishing industry. These challenges are contributing to the backsliding (or recalibration) that has occurred in the 2023-2024 period. As of December 2024, the democratic government was focused on legislative revisions that allow at-sea transshipment, reduce monitoring requirements, and weaken penalties for IUU fishing.

In addition to the comprehensive changes that directly affected workers in the seafood and fishing industries, **migrant workers more generally benefited from the long period of reform that occurred in response to the storm of media coverage.** The early government actions related to migration from 2014-2019 and later changes during and after COVID ultimately improved migrant workers' access to regularized status, social security, safe working conditions, and other government supports and services. In 2014, an estimated 49% of migrants held irregular status in Thailand, lacking the legal right to live and work in the country.⁵¹⁶ With improved pathways to regularization and other migration policy changes, by 2024 this estimate dropped to 35%, and among those regularized, they had more services, rights, and pathways to remedy harms than they had in 2014.⁵¹⁷

Private Sector Self-Regulation and Market Responses: The private sector response demonstrates how *Condition 6 (market dynamics underlie both the problem and the solutions)* manifested throughout the decade. International retailers and Thai suppliers rapidly adopted new formal requirements following media exposures and government pressure. The Seafood Task Force emerged as a central self-regulation mechanism, exemplifying *Condition 5 (cross-sector collaboration was the norm)*, developing codes of conduct, audit frameworks, and traceability systems. Major companies like Thai Union implemented ethical recruitment policies, eliminated recruitment fees, and established grievance mechanisms. By 2024, STF members demonstrated supply chain traceability and adopted environmental codes of conduct. However, the analysis reveals a fundamental contradiction rooted in Condition 6 (market dynamics) – companies continued demanding the lowest-cost sourcing while imposing compliance requirements, creating impossible conditions for suppliers. This “pushing social compliance initiatives down onto suppliers while sourcing decisions are based on the cheapest price” proved incompatible with eliminating forced labor.

However, the analysis reveals a fundamental contradiction rooted in Condition 6 (market dynamics) – companies continued demanding the lowest-cost sourcing while imposing compliance requirements, creating impossible conditions for suppliers.

Civil Society Capacity and Role Evolution: Thai CSOs were already supporting and advocating for migrant workers in the fishing and seafood industries as of 2014. Yet, they also underwent a significant transformation in capacity, expertise, and roles, directly reflecting *Condition 4 (INGO and CSO organizations had the capacity to support and demand change)*. CSOs have evolved from service providers to advocates, engaging in collaboration and influencing change across various venues. The formation of the CSO Coalition and the Migrant Working Group created formal mechanisms for coordinated action, embodying *Condition 5 (cross-sector collaboration)*. CSOs developed new

expertise in international human rights advocacy, legal strategies, and business engagement. Their formal role expanded to include government policy consultation, private sector partnerships, and serving as third-party grievance mechanisms. **Critically, CSOs became effective “watchdog” organizations, successfully pursuing landmark legal cases that led to policy improvements and holding both government and businesses accountable.** However, the regionalization of philanthropic support has decreased (though not ended) resources for the efforts and raises questions about the sustainability of *Condition 4 (CSO capacity)*, particularly given how *Process of Change D (philanthropic resources were strategically deployed)* enabled much of the expansion of their capacity and roles.

The formal systems changes represent genuine progress in creating legal frameworks and institutional mechanisms to address forced labor. Yet the persistent gap between formal requirements and actual implementation, combined with recent backsliding pressures, reveals how fragile these gains remain without sustained political will and adequate resourcing.

Question 3: Social Systems Changes

How have relevant informal norms, beliefs, perceptions, and commitments shifted?

The informal social systems underlying Thailand’s seafood industry have undergone significant, albeit incomplete, transformation over the past decade. While some deeply entrenched norms have shifted, others have proven remarkably resistant to change, creating a complex landscape where progress coexists with persistent structural barriers rooted in the foundational conditions identified in this analysis.

Evolution of Problem Recognition and Accountability Norms: Perhaps the most significant shift occurred very early in the story: how stakeholders perceive and discuss labor exploitation, directly reflecting *Condition 1 (a common understanding of the problem emerged)*. By 2016, this represented a fundamental change from previous denial or intentional ignorance to widespread acknowledgment that systematic forced labor existed throughout the supply chain. International retailers, Thai suppliers, and government officials moved from claiming ignorance to publicly accepting responsibility for addressing abuses. *Condition 2 (stakeholders generally agreed on a shared solution set)* became embedded in informal expectations – ethical recruitment, worker voice mechanisms, monitoring systems, and legal reforms transformed from optional initiatives to normalized requirements. *Condition 5 (cross-sector collaboration was the norm)* fundamentally altered informal expectations, with partnerships between government, businesses, and civil society viewed as standard practice rather than exceptional arrangements.

Persistent Cultural and Structural Barriers: However, the analysis reveals that *Condition 7 (cultural and political dynamics in Thailand that remained constant)* proved remarkably resistant to change. “Xenophobia and anti-migrant sentiment” continued to permeate Thai society, creating what CSOs described as a “two-tier society that is fully ingrained” that devalues migrant workers’ rights and welfare. These underlying beliefs help explain why *Process of Change E (implementation was incomplete and inconsistent)* characterized the decade – local officials and employers continued operating under informal norms that viewed migrant workers as inherently less deserving of protection, regardless of formal legal requirements.

Local officials and employers continued operating under informal norms that viewed migrant workers as inherently less deserving of protection, regardless of formal legal requirements.

Market Culture and Business Practice Shifts: The private sector experienced notable shifts in informal norms around supply chain responsibility, though *Condition 6 (market dynamics)* remained fundamentally unchanged. Where companies previously operated under assumptions of “plausible deniability,” new informal expectations emerged around due diligence and transparency. *Process of Change B (individual leaders shaped how change happened)* was crucial here, with business leaders incorporating sustainability and human rights considerations into their professional identities. However, the **deeper market culture around pricing remained largely unchanged.** The fundamental business norm of sourcing at the lowest possible cost persisted, creating ongoing tension with compliance expectations and limiting the depth of transformation possible.

Political Will and Governance Culture: The political commitment to reform proved highly volatile, directly reflecting *Process of Change C (change accelerated when pressure was high)*. The military government’s period (2014-2019) established expectations that protecting Thailand’s international reputation required addressing labor abuses. However, the return to democratic governance coincided with shifting these priorities, with NFAT successfully reframing reforms as economically damaging impositions rather than necessary protections. This reveals how shifts

in the political culture around national priorities and industry influence can rapidly undermine formal commitments when external pressure decreases.

The analysis demonstrates that while significant norm and framing shifts occurred around problem recognition, collaboration, and worker agency, deeper structural beliefs about migrant workers' worth and market priorities remained largely intact, explaining both the progress achieved and its current fragility.

Question 4: Drivers of Change

What were the primary drivers of these shifts including the contribution of the approach used by HU, the Freedom Fund, and its partners?

The systemic changes in Thailand's seafood industry over the past decade resulted from the strategic convergence of multiple drivers that created unprecedented pressure for reform while simultaneously building capacity to respond to that pressure. The analysis reveals **how external catalysts, internal system dynamics, and philanthropic interventions combined to create what stakeholders described as a perfect storm that fundamentally altered one of the world's most exploitative industries.**

Media Exposure and International Government Pressure as Primary Catalysts: The most powerful driver of initial change was the combination of investigative media coverage and coordinated international government action that created *Condition 1 (common understanding of the problem)* and triggered *Process of Change A (bold and dramatic early actions)*. The 2014 Guardian "Modern Day Slavery in Focus" exposés, funded strategically by Humanity United, and the journalism in the Associated Press and the New York Times linked forced labor and human trafficking directly to Western consumers' dinner tables, naming specific companies and leaders. This media storm, combined with the US TIP downgrade and EU yellow card threat, created unprecedented reputational and market risks for both Thai suppliers and international retailers. As one business leader explained, "It was the EU yellow card, the U.S. TIP Report, and The Guardian's investigation that triggered massive changes." This external pressure was essential because it motivated *Condition 3 (distinct stakeholder motivations)* – Thai suppliers feared losing export markets, international retailers faced consumer boycotts, and the Thai government risked economic catastrophe. Critically, HU's funding of the Guardian investigation demonstrates how *Process of Change D (philanthropic resources were strategically deployed)* could help to amplify investigative capacity beyond what traditional funding sources provided.

Market Dynamics as Both Barrier and Driver: *Condition 6 (market dynamics underlie both the problem and the solutions)* functioned as the system's most persistent driver, creating both the original incentives for exploitation and the eventual pressure for reform. The global demand for cheap seafood at scale had originally enabled systematic abuse, but the threat of market exclusion through the EU yellow card and U.S. sanctions transformed these same market forces into drivers of change. International retailers' procurement power became a mechanism for cascading reform requirements down supply chains, while Thai suppliers' dependency on export markets motivated their cooperation with reforms they might otherwise have resisted. However, the analysis reveals the fundamental limitation of market-driven change: Companies continued sourcing based on the lowest cost while demanding compliance, creating impossible conditions that served as a key driver of *Process of Change E (implementation remained incomplete)* throughout the decade.

Unique Political Window and Leadership: *Process of Change A (bold and dramatic early actions)* was only possible due to the specific political context of Thailand's military government from 2014-2019. The junta's ability to act unilaterally, without dependency on traditional electoral constituencies or industry lobbying, enabled the rapid legal overhauls that democratic governments had been unable to achieve. *Process of Change B (individual leaders shaped change)* was crucial here – specific private sector leaders acted quickly to create the new collaborative space (the Seafood Task Force) and in their own organizations to make commitments and revise practices.

Civil Society Capacity and Cross-Sector Collaboration: The sustained nature of change depended heavily on *Condition 4 (INGO and CSO capacity)* and *Condition 5 (cross-sector collaboration becoming the norm)*. Thai CSOs have evolved from fragmented service providers into strong advocates, capable of maintaining pressure across political transitions. They provide technical expertise to government and business reforms, support legal advocacy, and facilitate worker organizing, creating bottom-up pressure for continued change. The formation of collaborative mechanisms like the CSO Coalition and their involvement in the Seafood Task Force created institutional spaces where multi-stakeholder problem-solving could occur. **Philanthropy's role was crucial here:** FF's Hotspot model provided the sustained funding and capacity building that enabled CSOs to take on expanded roles and changed how the CSOs worked together, both through a new formal space for collaboration (the CSO Coalition) and increased

partnerships on specific projects. Additionally, HU's support for cross-sector initiatives like OceanMind's work with the government created demonstration models for effective collaboration.

Strategic Philanthropic Intervention at Critical Moments: *Process of Change D (philanthropic resources were strategically deployed)* reveals how HU and FF's approach went beyond traditional grantmaking to become a driver of change itself. Their funding of pressure points – from investigative journalism to critical reports like Praxis Labs 2019 – created moments when *Process of Change C (change accelerated when pressure was high)* could be sustained even as other external pressures declined. Their support for early adopter models and cross-sector partnerships helped demonstrate that alternatives to exploitative practices were viable, addressing industry claims that reform was impossible. Their decade-plus commitment also provided stability that enabled local partners to maintain capacity and pressure through multiple political and economic disruptions.

Environmental-Labor Rights Intersection: *Process of Change F (environmental sustainability intersected with human rights priorities)* proved crucial as a driver of change at key points in time. The EU's yellow card mechanism, originally designed for illegal fishing, became a powerful lever for labor rights by explicitly linking IUU fishing with human trafficking. This intersection enabled advocates to access policy tools and create pressure points that might not have been available through labor rights channels alone, while also expanding the coalition of actors concerned about reform to include environmental organizations and sustainability-focused businesses.

The analysis demonstrates that **no single driver was sufficient to create lasting change**. Rather, the convergence of external pressure (media, government sanctions), internal capacity (CSO development, political leadership), market incentives (export dependency, consumer pressure), and strategic philanthropic intervention created a system-wide momentum (and one might even say a movement) that enabled transformation. However, the recent political shifts and risks of backsliding reveal how fragile this convergence remains – as external pressure decreased and key leaders departed, drivers that had enabled change began operating in reverse, highlighting the ongoing need for sustained pressure and capacity to maintain progress.

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Question 5: Funder Practices

How have HU and Freedom Fund approached their role in catalyzing and supporting systemic changes?

Humanity United and Freedom Fund's approach to catalyzing systemic change in Thailand's seafood industry combines strategic pressure tactics with sustained capacity building through a partnership that leveraged their complementary strengths over more than a decade. Their approach included **deploying approximately \$22 million in U.S. dollars over 10 years** through grants and commissioning studies, focusing first on Thailand specifically and later the larger region. It also included **frequent in-person, in-country engagement by programmatic directors** in both organizations, leading to **long-term relationships across sectors and with many different leading stakeholders**. Their approach directly influenced multiple conditions and processes of change identified in this analysis.

Strategic Systems Convening and Targeted Interventions: HU's approach demonstrated a "systems convenor" role – actively cultivating *Condition 1 (common understanding of the problem)* and *Condition 2 (shared solution set)* through strategic interventions. *Process of Change C (change accelerated when pressure was high)* was directly influenced by HU's funding of key pressure points including the Guardian's investigative journalism that launched the 2014 media storm and the 2019 Praxis Labs report that successfully challenged the private sector to strengthen its practices and contributed to decisions by the Seafood Task Force to adopt a membership model that increased private sector accountability. This strategic approach of "putting in funding where no one else would" addressed system opacity by supporting investigative research into the dark corners where exploitation continued. HU also funded early adopter models, such as the OceanMind vessel monitoring system partnership and Thai Union's ethical recruitment policies, creating demonstration cases by supporting action when the windows for change were present due to *Process of Change A (bold and dramatic early actions)*.

Complementary Top-Down and Bottom-Up Partnership: The HU-FF partnership created a comprehensive strategy

that simultaneously strengthened *Condition 4 (INGO and CSO capacity)* while leveraging *Condition 6 (market dynamics)* and *Condition 3 (stakeholder motivations)*. While HU focused on international pressure, private sector engagement, and government relations, FF's Hotspot model concentrated on strengthening local civil society capacity. This division of labor proved crucial: FF's sustained support enabled Thai CSOs to evolve from fragmented service providers to advocates capable of *Condition 5 (cross-sector collaboration)*, while HU's work ensured external pressures and market incentives remained aligned with local organizing efforts. *Process of Change D (philanthropic resources were strategically deployed)* characterized their entire approach, with regular coordination through quarterly meetings and bi-annual systems sensing sessions, enabling adaptive strategy refinement based on changing conditions.

Adaptive Strategic Evolution: The analysis reveals how HU and FF's approach evolved a sophisticated understanding of how to strengthen *Condition 4 (CSO capacity)* as integral to systems change. Initially viewing CSOs primarily as service providers and evidence gatherers, they progressively recognized CSOs as integral to multiple change processes – policy advocacy, private sector partnerships, government implementation, and worker organizing. By 2020, CSO work was integrated into broader systems change outcomes rather than treated as a separate intervention area. This evolution demonstrates a learning-oriented philanthropic practice that adapted based on field realities rather than imposing predetermined models, directly supporting the cross-sector collaboration that became central to change.

Tension Between Strategic Direction and Local Ownership: However, the analysis also reveals inherent tensions in their approach. The “strategic and systems orientation” that made their interventions effective also created dependency relationships with local partners. As FF's own evaluation noted, they may have “over-engineered” the work, with rapid interventions leaving “insufficient time for partners to organically develop and figure out things together.” The shift to regionalization in 2020, while strategically sound given *Condition 6 (market dynamics)*, reduced support to Thai CSOs at a moment when political backsliding required sustained local capacity, potentially undermining *Condition 4 (CSO Capacity)* just when *Process of Change C (pressure)* was declining.

Market Pressure and Movement Building: HU's critical perspective on voluntary industry self-regulation shaped funding decisions that consistently challenged *Condition 6 (market dynamics)* when market-based solutions proved inadequate. The commissioning of studies that explicitly critiqued MSC certification and businesses' effectiveness demonstrated willingness to confront powerful actors when their approaches proved inadequate. Simultaneously, their support for diverse organizational approaches – from legal advocacy to worker organizing to policy research — created the “powerful movement” that multiple stakeholders credited with driving comprehensive change (*Condition for Change 4, INGO and CSO capacity*), directly enabling *Process of Change B (individual leaders)* and *Process of Change C (pressure)*.

Sustained Commitment Amid System Fragility: Perhaps most significantly, HU and FF's decade-plus commitment provided stability amid volatile political and market conditions. Their continued funding through multiple Thai government transitions, COVID disruptions, and the Myanmar coup enabled local partners to maintain pressure and capacity when other actors withdrew attention. However, the current moment reveals the central philanthropic challenge: Their strategic success in creating systemic change also created ongoing needs for support that may exceed their continued regional presence, particularly given how *Condition 4 (CSO capacity)* and *Process of Change D (strategic philanthropic deployment)* have been central to sustaining progress.

The HU-FF approach demonstrates both the potential and limitations of strategic philanthropic systems leadership – capable of catalyzing dramatic change through well-timed interventions and sustained capacity building, yet ultimately dependent on broader political and market conditions that extend beyond philanthropic influence.

Question 6: Future Needs

What is the evidence of the durability of positive changes in light of continued changes within Thailand and regionally, and what are the remaining needs to decrease forced labor and human trafficking in Thailand?

The durability of positive changes in Thailand's seafood industry presents a complex picture of genuine but fragile progress, with evidence pointing to both embedded improvements and significant vulnerabilities that threaten to reverse hard-won gains. The analysis reveals that while certain changes have proven resilient, others remain dependent on conditions that are actively deteriorating, creating an urgent need for strategic interventions to protect and advance reform.

Evidence of Durable Progress: Several key changes demonstrate genuine embedding within the system that

extends beyond superficial compliance. *Condition 5 (cross-sector collaboration became the norm)* has proven remarkably durable, with partnerships between government agencies, businesses, and CSOs continuing even amid political transitions and reduced external pressure. Thai CSOs maintain strong capacity for legal advocacy, policy engagement, and worker organizing, even if some elements of *Condition 4 (INGO and CSO capacity)* are at risk of not sustaining. For example, the 2023-2024 period shows CSOs successfully negotiating agreements with 52 vessel owners affecting 1,200 fishers and achieving collective bargaining in 12 seafood factories, demonstrating sustained worker organizing capacity independent of external funding. Private sector commitments also show durability – STF members continue demonstrating supply chain traceability, adopting an environmental code, and implementing an audit framework, while major Thai suppliers advocate against government rollbacks that would harm their export competitiveness. Significantly, some businesses now recognize that maintaining competitiveness requires proactive investment in compliance systems, suggesting *Condition 6 (market dynamics)* created durable incentives to sustain certain reforms.

Evidence of Fragility and Backsliding: However, the analysis reveals concerning signs that foundational conditions for change are eroding. *Process of Change C (change accelerated when pressure was high)* operated in reverse from 2019-2024, with declining external pressure enabling political backsliding. The democratic government's passage of legislative revisions allowing some forms of at-sea transshipment, reducing monitoring requirements, and weakening IUU penalties directly contradicts *Condition 2 (shared solution set)* that had emerged earlier. Most troubling, *Condition 7 (cultural and political dynamics that remained constant)* has reasserted itself, with NFAT successfully lobbying for rollbacks by exploiting persistent xenophobia and economic nationalism. The 2024 ILO findings show forced labor among fishers increasing from 10% in 2017 to 18% in 2024, suggesting that *Process of Change E (incomplete implementation)* has allowed regression in worker outcomes even as formal systems appeared to improve.

Regional Dynamics Affecting Durability: The Myanmar coup and COVID-19 pandemic created regional disruptions that fundamentally altered the context supporting reform. The collapse of formal migration channels increased worker vulnerability and employer leverage, while the influx of refugees created a buyer's market for labor that undermined worker bargaining power. Simultaneously, the regionalization strategies adopted by STF, ILO, and philanthropic partners have reduced Thailand-specific pressure just when backsliding risks peaked. The “encircling effect” theory that motivated regional expansion assumes continued progress in Thailand, but evidence suggests that without sustained pressure, gains in one country could be rapidly reversed while attention shifts elsewhere.

Critical Needs for Sustaining Progress: The analysis points to several urgent interventions needed to protect and advance change:

- First, **restoring external pressure through mechanisms like EU trade negotiations and consistent international government attention is essential**, given how Process of Change C (pressure) demonstrates that reform stalls when pressure declines. The EU's adoption of Due Diligence legislation and Free Trade Agreement negotiations represent critical leverage points that need sustained activation.
- Second, **strengthening implementation capacity remains fundamental**, particularly for the PIPO system, which continues to fail in identifying forced labor despite thousands of inspections. This requires not just training and resources – it also requires addressing Condition 7 (corruption and anti-migrant sentiment) that systematically undermines formal protections.
- Third, **protecting and expanding CSO capacity emerges as critical for durability**. The analysis shows CSOs serve as essential watchdogs that maintain accountability across political transitions, yet the regionalization of philanthropic support threatens this capacity just when political backsliding accelerates. This also applies to the INGOs, who maintained pressure on the system and served as technical experts throughout the ten years, supporting government and private sector reforms.
- Fourth, **addressing market contradictions requires continuing to explore how to align pricing with compliance expectations** and make it riskier and ultimately more expensive to purchase from less-regulated, cheaper markets than better-regulated markets. The persistent pattern of companies demanding reforms while sourcing based solely on cost creates impossible conditions that Process of Change E (incomplete implementation) shows leads to incomplete implementation and eventual regression.

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Long-term Structural Needs: Beyond immediate protection of gains, several structural changes remain necessary for sustainable

progress. *Condition 7 (corruption and anti-migrant sentiment)* highlights the need for broader social change regarding migrant workers' status in Thai society, including legal reforms enabling migrant organizing and collective bargaining. Without addressing underlying xenophobia and economic nationalism, the motivations to act on the issue remain vulnerable to political manipulation. Additionally, sustainable change requires *Process of Change D (strategic philanthropic resource deployment)* that builds local ownership rather than dependency – philanthropy's successful systems change paradoxically created ongoing support needs that exceed available resources.

The evidence suggests that while meaningful progress occurred, its durability depends on factors largely beyond the control of any single actor. Protecting these gains requires coordinated action to restore external pressure, strengthen implementation capacity, support local advocacy, and address persistent structural barriers that enable exploitation. Without such intervention, the analysis warns that the current trajectory points toward continued erosion of reforms, potentially returning the industry to conditions resembling those that prompted the initial crisis a decade ago.

Question 7: Thai Civil Society Organizations

How and under what conditions did CSOs in Thailand contribute to changes in the Thai seafood system from 2014-2024 in Thailand? How did the CSOs themselves change over time?

Thai CSOs underwent a fundamental transformation from 2014 to 2024, evolving from fragmented service providers into a more cohesive network functioning as strategic drivers of systemic change in the fishing and seafood industries. This evolution was enabled by specific conditions and processes that amplified their impact while creating new challenges.

Crisis-Driven Evolution

Before 2014, Thai CSOs like the Labour Protection Network, Raks Thai Foundation, and Migrant Workers Rights Network operated independently with limited collaboration, focusing on service provision rather than advocacy. The 2014 media storm and international pressure (*Process C*) created urgency and opportunity, while strategic philanthropic investment (*Process D*) provided unprecedented resources that fundamentally altered the CSO landscape.

Collaborative Capacity Building

The most significant change was the development of collaborative capacity among CSOs. The formation of the Civil Society Organisation Coalition for Ethical and Sustainable Seafood in 2016 represented a watershed moment, enabling coordinated advocacy and unified influence. Additional platforms, like the Migrant Working Group, provided collaborative mechanisms that allowed CSOs to leverage complementary expertise while maintaining specialized focus areas.

This collaborative evolution directly supported Condition 5 (cross-sector collaboration), with CSOs becoming essential partners in government policy development and private sector reform initiatives. Their local knowledge and community relationships made them indispensable to international retailers, government agencies, and INGOs seeking authentic engagement with affected workers.

Strategic Advocacy Impact

CSOs transformed from reactive service providers to proactive advocates capable of influencing policy and implementation. They achieved victories ranging from local changes to national precedents through strategic litigation and direct pressure on government at various levels. Their legal advocacy was also successful in prosecutions, creating visibility that maintained pressure on government and private sector actors to continue reforms.

Adaptive Worker Organizing

Despite legal restrictions preventing traditional union organizing, CSOs developed effective alternative models. They supported workers in forming binding collective agreements when representing 15% of employees and facilitated worker welfare committees in larger workplaces, demonstrating successful navigation of the intersection between *Conditions 4 (CSO capacity)* and *Condition 7 (political constraints in Thailand)*.

Strategic Tensions and Sustainability

CSO partnerships with international NGOs and private sector entities became increasingly sophisticated, but also created tensions as organizations balanced watchdog roles with collaborative relationships. The shift in philanthropic strategies toward regionalization around 2020 disrupted established networks, highlighting sustainability challenges.

By 2024, Thai CSOs had demonstrated remarkable transformation, becoming essential actors in monitoring implementation, supporting worker organizing, and maintaining reform pressure — exemplifying how local organizations can leverage favorable conditions and processes to drive systemic change.

Conclusion

The 10-year story in Thailand began in a very unique way with the confluence of a media storm with shocking stories of violence and abuse; market-disrupting actions of the EU and U.S.; the dependency of the Thai seafood and fishing industry on these export markets; calling out of global brands and even their individual leaders; and the new military government's willingness to act rapidly and with little consideration of negative impacts on the fishing industry.

These major drivers of change were steadily supported by many other smaller actors and moments, from the steady flow of pressure by CSOs and INGOs to the partnership between private, public, and nonprofit stakeholders to the increasing pressure that workers placed on their places of employment. Philanthropy played a role as well, deploying resources in key places and at key times, supporting both market-based reforms and reforms driven by government and workers.

Ultimately, much of the data, both secondary and from this study, suggests that **workers' experiences in the seafood and fishing industries have improved as a result of this storm of action, big and small**. Many of the workers in the fishing industry focus groups reported improvements. Data from ILO and HRW reports suggest significant improvements. Journalist reporting is also qualitatively different in the current times, in terms of the severity of human rights violations being described.

However, the most recent evidence from the ILO and the FRN suggests backsliding has begun, not just in the policies, but also in the outcomes for workers. Workers are more at risk of injury on the job, working longer hours, and for fishery workers, more likely to be in forced labor again. CSOs, INGOs, and others interviewed saw the improvements, but also question whether things have truly improved given the backsliding over the last five years.

“Over the past 10 years, we're still uncertain whether the laws are being truly and consistently enforced, and we don't really know how the government handles large, high-profile cases. As a result, we don't see substantial progress or confidence in how far we've actually come.”

Thai supplier/association discussion group⁵¹⁸

When these same participants are asked whether there are any reforms that need to be protected that are currently helping workers, however, they are able to **name quite a few critical reforms and describe the improvements in the system they wanted to see protected**. It is a system that has a legal framework and private sector investments in new practices that are worth keeping. And, it is an unfinished reform process.

Upon reviewing the findings, it becomes clear that the problem of forced labor remains unresolved in Thailand. It may be that the inconsistent and incomplete implementation of reforms, the dependency on industry self-regulation to advance additional reforms, and the continued abuses that are visible in the system to those on the ground result in a picture of a system that is still deeply flawed, explaining how they describe what is happening on the ground.

However, the data also seems to suggest that through a complex array of government reforms, private sector responses and self-regulation, pressure from CSOs, INGOs, and sometimes the media, and the ongoing visibility of the issue in the global market, **this is a system that has successfully addressed many of the most egregious forms of forced labor and human trafficking and has meaningfully improved conditions on many vessels, in many factories, in the shrimp processing supply chain** (e.g., ending child labor in peeling sheds), and has improved conditions for many workers in migration pathways. It is a system that has made incomplete progress, but progress, nonetheless.



Appendix A: Methods Details

Photo: © Stride, Josh/Humanity United. Sorted catch for market at port in Thailand. 2016.

This independent study's methodology is a combination of descriptive qualitative analysis and causal mapping, drawing on secondary sources and primary data collected in Thailand and with partners in other countries through virtual sessions.

Methodological Approach

Causal mapping is a powerful analytical tool for making sense of how, why, and under what conditions change happened including in complex, dynamic environments. A historical analysis approach was integrated with the causal mapping methodology in order to examine patterns that emerged over time. In this approach, qualitative and secondary data are used first to describe the state of the system, and then causal data are used to understand the process of change.

The study team made the decision to draw data from existing reports along with the primary data from focus groups, interviews, and sensemaking discussion groups focused on the causal findings. Although there is quantitative information available from other sources, such as changes in seafood purchasing from Thailand, many existing reports have already done this type of analysis, and the goal was not to duplicate existing efforts but rather to synthesize across previous work.

Strength of Evidence

The analysis utilized a rubric that helped to assess the strength of evidence for each key finding (Figure C1). Findings were included in the study when they met a minimum of Level 3 on the rubric (multiple stakeholders from multiple perspectives or surfaced during a multi-stakeholder discussion group).

Figure C1: Strength of evidence rubric applied to determine which evidence to include

1	2	3	4	5
No evidence is available to corroborate a specific claim of a causal connection between systems dynamics, the interventions, and observed outcomes.	Evidence from a single source supports this claim	Evidence from multiple sources supports this claim (e.g., more than one document* or more than one interview). However, all sources come from similar perspectives likely to hold similar biases about how change happened. Also includes a single discussion group.	Evidence from multiple sources supports this claim. The multiple sources come from distinctly different perspectives, unlikely to hold similar biases about how change happened.	Evidence from multiple sources supports this claim, at least one of which was a discussion group. The multiple sources come from distinctly different perspectives, unlikely to hold similar biases about how change happened.
Not included	Included only as supporting evidence where aligns with other findings	Included in the analysis; if conflicting evidence was present, both claims are included.		Included and centered in the analysis; if conflicting and Level 3 or 4 evidence was present, this claim is centered.

* Evidence sourced from a report that itself had multiple sources of data was scored at a Level 3. For example, worker outcomes from the ILO studies were identified as Level 3 due to the multiple workers included in their research. Similarly, findings in an academic article that were cited back to multiple other reports were also credited as Level 3.

The evidence rubric was used throughout the study and was particularly relevant during the development of the causal findings that are at the core of this study. A causal map with over 350 distinct "causes" (events, patterns, behavior, or beliefs) and over 350 causal connections between events was developed, with every "cause" and every connection verified through one or more pieces of evidence.

Through this approach, the evidence supporting the main study findings, including processes, conditions, and answers to the seven study questions, was triangulated at the individual fact and perception levels, rather than just the overall findings.

Quality Control

The validity of the causal findings within the generative inference approach described above was strengthened by:

- Transparency of evidence sources, including citing the evidence throughout the report with more than 500 citations representing the primary and secondary data used in the analysis leading to the findings.
- Member-checking critical information through five discussion groups focused on the causal patterns.
- Strengthening cultural sensitivity through partnership with a Thai evaluator who works with migrant communities and has a long relationship with the Burmese community, and partnering with a former Freedom Fund staff member who has relationships throughout the CSO network who could help to identify and approach people respectfully.
- Purposeful sampling of interview and discussion group participants to represent a wide range of perspectives, including sampling to ensure representation across stakeholder groups and solicit involvement from the people most often named in reports and interviews as critical to this work. This collection of interviewees was developed after the initial round of data collection and informed by the in-country stakeholders and program staff. In the end, almost all individual leaders' names that interviewees and discussion group participants regularly mentioned as essential people in the story were interviewed, along with many others who observed or participated in the systems changes.
- Actively seeking and analyzing negative cases or alternative explanations and looking for verifying or conflicting data for findings before including them.

Sources of Data

Scoping Interviews

Five scoping interviews were conducted in November and December of 2024, focused on surfacing the most important events and actors in the system over the last 10 years. A key representative of each major sector was invited to the scoping interviews, including from the CSO community, among INGOs, a Thai government representative, a philanthropic partner on the ground in Thailand, and a private sector representative.

Document Analysis

In total, 135 documents were included in the document analysis. Only eight were fully coded manually by the research team; most were read by the research team and tagged for their core content, and all were included in the AI-assisted analysis. An initial set of documents was identified in partnership with the Freedom Fund team. Additional documents were solicited from discussion groups and interviewees. The research team also identified some documents as additional information was sought to clarify key information in the causal analysis. Information generated by organizations at the center of this 10 year story was included along with peer-reviewed reports and articles were prioritized. Apart from the Freedom Fund and Humanity United's internal reporting, all documents have been shared publicly, though not all are still available online. Appendix B's reference list includes a complete list of the documents utilized.

Deep Dive Interviews

A total of 26 individual interviews were conducted between March and May 2025 with individuals representing many different roles throughout the sector (INGO, government, Thai CSO, Thai suppliers, Thai vessel owners, international retailers, and philanthropy). The interviews used a common format, beginning by letting participants know that the study had already learned about a core set of widely understood and reported changes in the industry and the major drivers, such as the changes to the fisheries laws, the TIP report, media investigations, etc. Then the interviewees were asked to share, from their unique position and perspective in the system, what was happening behind the scenes that could help make sense of not only why these changes happened, but why they happened the way they did. They were also encouraged to share other changes that were an important part of the story. Interviewees were prompted to go deeper, to explore why change happened, the harms that happened, and to share thoughts about the role of philanthropies, while still leaving most of the interview time to draw on the unique vantage point of each interviewee and explore their understanding of how, why, and under what conditions change had happened.

Interviewees in late April through May were strategically selected to help clarify conflicting points of view surfaced in previous discussion groups and interviews. Depending on their position and familiarity with different time periods and parts of the system, specific questions were asked to help understand contradictory change stories.

Focus Groups

Four focus groups were conducted with workers who also serve as organizers and leaders in their workplaces. Two groups were composed of workers in seafood factories and two with workers on vessels. The workers spoke primarily Burmese and an interpreter familiar with the context supported the sessions. The Thai researcher conducted the sessions with participation from the research lead.

CSO Deep Dive

Many of the widely read reports about how change happened in Thailand have been generated by foundations, INGOs, and governments outside of Thailand. Few of the widely referenced reports tell the story from the perspective of the CSOs whose work in-country was critical. Serving as both advocates, service providers, and organizers, they have played a critical role over the last 10 years. The deep dive into that role was conducted by engaging with 10 participants in a two-day sensemaking session, where they explored how change happened, why changes happened, their sector's roles in those changes, and what matters now and in the future. Additional interviews were conducted to further understand the state of the field and its contributions over the last 10 years.

Sensemaking Discussion Groups

Five sensemaking discussion groups were held in March and April 2025. One was part of the larger two-day CSO Deep Dive process, and the other four were two hours each. Each sensemaking group consisted of a small number of participants (up to 10 in person and three virtually) from the same sector, working on similar aspects of the system/issue. They were invited to review the initial set of key events identified from the early data collection and add, remove, and draw connections, refining the causal map. Their visual exploration of a map illustrating how change occurred, combined with the discussion, provided detailed insights into the conditions and impact of these changes. They also weighed which items were the most critical drivers of change, with the prompt to identify those items that fundamentally shifted everything that came after. These discussion groups served as a critical part of the sensemaking process to understand how, why, and under what conditions change happened.

Feedback on Initial Findings

Participants in interviews and discussion groups were invited to review the initial findings related to the conditions, processes, and population outcomes. Their written feedback was analyzed and incorporated into revisions using the same evidence standards as throughout the study for the level of evidence needed for inclusion.

Use of Artificial Intelligence as an Analytical Assist

Multiple artificial intelligence platforms were used at various points in the study to enhance the research team's capacity to manage the vast amounts of qualitative data. AI was used as an assist, but not as a replacement for human engagement with the information. AI was used for two primary purposes: to help with the volume of data available to tell the story, and to help with the complexity of the story, without risking oversimplifying the analysis.

AI as an assist to allow the inclusion of a high volume of existing and new data.

The primary data collected as part of this study and eight secondary sources were read, coded, and analyzed by the research team without use of AI. However, given the additional 130 reports and documents used to tell the story, the AI was a critical assist in sourcing information from across the resources. AI was used to find supporting and conflicting evidence for causal events and causal connections before they were included in the analysis. The researchers created a causal map for analysis purposes, covering 10 years of change and containing over 350 discrete events and their connections. Every event and connection was cited to at least one, and often four or more, specific sources. It was also used to identify other types of information, such as key stakeholders regularly mentioned across many documents and to search for details to flesh out key events.

AI as an assist to hold the complexity of the full story and find alternative explanations in the data.

The sheer volume of data included in this study and the complicated story that needed to be told (many sectors,

many changes, over 10 years) created a very real risk that the analysts would anchor in some themes over others and miss critical patterns. It was critical to challenge the cognitive biases that are inherent in this type of large, complex research process.

To do this, an AI platform functioned as a thought partner that could access all the information, help to test initial themes and patterns found in the data, and propose potential new themes. The use of AI allowed the study to maintain both a 10,000-foot view of the change while capturing and analyzing data at the 1,000-foot level throughout the 10 years.

Managing AI Biases and Hallucinations

In all the uses of AI, researchers involved remained closely connected to the data. For example, when AI was used to pull concrete information from a report (key events, key stakeholders), every fact brought into the analysis was verified by returning to the report to confirm the information before it was used in the full analysis. Additionally, to meet the study's level of evidence requirements, facts sourced by an AI from a single report were classified as Level 2 on the evidence rubric and therefore required verification through additional evidence from other sources.

All AI-generated themes or patterns were checked, using the sources of evidence AI found and continuing the discussion with AI to look for conflicting evidence. Multiple AI platforms were also used to ensure the biases of one platform did not overly influence the analysis.

Managing Data Security

The three AI platforms used for the analysis all utilize adaptations of the CIS Critical Security Controls, which represent an industry best practice for data security. Account levels were selected to ensure the data would not be used for training purposes. Privacy policies were reviewed, and an expert in assessing LLM data security confirmed the appropriateness of the platforms. Primary data was stripped of any identifying information (including when the interviewee or discussion group participant self-disclosed their organization name during the discussion) before being loaded into the one platform, where all data files were included together.

Study Limitations

The research for this report was limited by a variety of factors.

The scope and breadth of events and experiences relevant to the study questions were extensive, and many pieces of the larger story were documented in multiple places, but the overall story was not yet in any one place. The sheer volume of information that needed to be parsed and analyzed was massive. The use of AI enabled far more data to go into this analysis than otherwise would have been possible, but also introduces risks of the researcher missing key information from the sources. While AI hallucinations and biases can be more easily managed through the analysis process, conducting quality control for AI that fails to surface available information in the documents is more challenging. It can be partially mitigated for by the researcher's familiarity with the data and the analyst coding of much of the critical information for the study.

The data collected from workers was not intended to, nor did it demonstrate, the current state of worker outcomes in the system. The worker focus groups were instead used to understand how changes looked on the ground from the experience of workers who were helping to organize other workers and advocate for change. In this way, their perspectives were comparable to those of other stakeholders and represented another key group actively working to influence the system. They were selected for this leadership, rather than being a representative sample of workers across different jobs and geographies. This limited the population-level outcomes to those of other studies already publicly available.

The study was further limited by the limited access to the private sector. We are fortunate to have interviews and discussion group participation by representatives of multiple Thai businesses, including seafood processors, associations, and vessel owners. Thai suppliers also participated in the review of the findings. However, international retailers were less likely to participate, with only two interviews from this perspective and no discussion group participants or reviewers of the preliminary findings.



Appendix B: Sources

Photo: © Stride, Josh/Humanity United. Fishing vessel docked at port in Thailand. 2016.

Primary Sources

Discussion and Focus Groups

Thai Civil Society Organization (CSO) discussion group conducted in Bangkok Thailand in March 2025

International Nonprofit Organization (INGO) discussion group conducted in Bangkok Thailand in March 2025

International Nonprofit Organization (INGO) virtual discussion group conducted online in April 2025 [two groups conducted]

Migrant seafood worker leaders focus group conducted in Pattani Thailand in March 2025

Migrant vessel worker leaders focus group conducted virtually in March 2025

Thai supplier/association discussion group conducted in Bangkok Thailand in March 2025

Interviews

The locations of interviews are not disclosed as it risks revealing participants' identities due to the indication of the sector each interviewee represents and limited numbers of interviewees. Additionally, all interviews are credited as occurring in 2025, however five interviews were conducted in late 2024 (one per sector). The decision to indicate 2025 even for these five was made to protect the identities as the interviewees' participation in the study in November and December is known beyond the research team. Interviews cited include:

Government interview, 2025

INGO interview, 2025

International private sector interview, 2025

Philanthropic interview, 2025

Thai CSO interview, 2025

Thai vessel owner interview, 2025

Stakeholder feedback on findings

Stakeholders were invited to provide feedback on the findings from Sections 1 and 2. Where their feedback led to changes in the report, it is cited by stakeholder type:

Philanthropic feedback on findings

Government feedback on findings

Private sector feedback on findings

INGO feedback on findings

Thai CSO feedback on findings

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San Francisco
456 Montgomery Street
Suite 500
San Francisco, CA 94104
United States
Email: info@humanityunited.org
Tel: +1 (415) 426-6300

Washington D.C.
1875 K Street N.W.
Suite 750
Washington, D.C. 20006
United States
Email: info@humanityunited.org
Tel: +1 (202) 503-3200

www.humanityunited.org



The Freedom Fund (UK)
Lower Ground, Caledonia House
223 Pentonville Rd
London N1 9N
United Kingdom
Email: info@freedomfund.org
Tel: +44 (0) 203 777 2200

The Freedom Fund (US)
315 Flatbush Avenue
#406
Brooklyn, NY 11217
United States
Email: info@freedomfund.org
Tel: +1 (929) 224-2448

www.freedomfund.org



Policy Solve
2633 Galena St
Denver, CO 80238
United States
Email: jewlya@policysolve.com

www.policysolve.com