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

In 2025, Humanity United and the Freedom Fund commissioned a study by PolicySolve to understand how, why, and under what conditions change happened over a ten-year period related to forced labor and human trafficking in the Thai seafood industry. Using a rigorous, causal-mapping methodology and engaging over 60 stakeholders and 130 reports, a story emerged about what enabled (and sometimes disabled) changes in Thailand and globally to protect workers on vessels and in processing. This paper contains key findings. The full report is available at:

[www.pollicysolve.com/resources/retrospective](http://www.pollicysolve.com/resources/retrospective)

### Where do we go from here?

Ten years of reform have produced genuine but fragile progress. The most recent data reveal a concerning pattern: forced labor among fishers has increased from 10% in 2017 to 18% in 2024, indicating a reversal in labor outcomes. This reversal comes despite meaningful improvements in seafood processing, where only 1% of workers now meet the definition of forced labor, and despite significant reductions in the most egregious violence and abuse. The divergent trajectories indicate a system in which some changes are deeply embedded, **while others remain dangerously dependent on deteriorating conditions.**

For funders, suppliers, buyers, and advocates working to eliminate forced labor in global supply chains, understanding what is durable, what remains fragile, and what interventions can protect progress is essential to preventing a return to crisis conditions.

**Evidence of Durable Progress:** Several key changes demonstrate genuine, systemic change that extends beyond mere compliance. Cross-sector collaboration has been in place for over ten years. It has become the norm in the system, with partnerships among government agencies, businesses, and CSOs continuing even amid political transitions and reduced external pressure. Thai CSOs maintain strong capacity for legal advocacy and policy engagement. They also support critical organizing work, as evidenced by their recent success in helping workers negotiate with 52 vessel owners and secure collective bargaining in 12 seafood factories.



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Private-sector commitments also demonstrate durability: Seafood Task Force members continue to demonstrate supply-chain traceability, adopt an environmental code, and implement an audit framework. At the same time, major Thai suppliers have opposed government rollbacks that would harm their export competitiveness. Significantly, some businesses now recognize that maintaining competitiveness requires proactive investment in compliance systems.

### Why Gains Are Eroding

Despite these durable changes, three interconnected dynamics are driving backsliding. First, the **external pressure that sustained reform from 2014-2019 has declined dramatically**. When the European Commission lifted the IUU yellow card in early 2019, it removed a critical lever compelling government action. The regionalization of philanthropic and international focus on addressing the issue reduced Thailand-specific attention precisely when political conditions became more permissive of rollbacks. The Myanmar coup and COVID-19 pandemic further shifted attention away, allowing the democratic government that was focused on reviving the struggling economy to pass 2024 legislative revisions that weaken monitoring requirements, allow some at-sea transshipment, and reduce IUU penalties.

Second, **market contradictions create impossible conditions**. International buyers demand compliance while making sourcing decisions based solely on cost, undermining the business case for reform. Thai suppliers face intense pressure to both meet rising labor standards and compete with lower-cost producers. As they lose market share, they lose the market incentive to maintain reforms.

Third, **political and cultural barriers continue and, in some ways, are gaining strength**. The National Fisheries Association of Thailand has successfully lobbied for rollbacks by exploiting persistent xenophobia and economic nationalism. Corruption at multiple government levels continues to undermine formal protections and weaken implementation, while anti-migrant sentiment limits political will to address structural vulnerabilities affecting primarily non-Thai workers.

### Critical Interventions Needed Now

Four urgent interventions emerge as necessary to protect progress.

First, **external pressure must be restored from outside of Thailand**. International government attention, such as through the U.S. Trafficking in Persons report or the EU's Free Trade Agreement negotiations, needs to be utilized steadily. The pattern is clear: reform stalls when pressure declines.

Second, **implementation capacity requires fundamental strengthening**, particularly within government monitoring practices, including the PIPO inspection system. This extends beyond training and resources to address corruption and anti-migrant sentiment that systematically undermine formal protections.

Third, **the capacity of Thai civil society organizations and international non-governmental organizations operating in Thailand must be protected and expanded**. These organizations serve as essential watchdogs, maintaining accountability during political transitions by providing critical technical expertise, exerting pressure on both the private sector and the Thai government, and supporting workers and organizing efforts.

Fourth, market contradictions must be addressed through fundamental changes in buyer sourcing approaches. **Aligning pricing with compliance expectations requires making purchases from less-regulated markets riskier and more expensive**. This means buyers either accept higher costs or develop pricing models that distribute compliance costs across supply chains rather than imposing them entirely on suppliers. Demanding high standards while making purchasing decisions based solely on the lowest cost creates incentives and resources to only partially implement required changes, enabling exploitation to persist beneath formal compliance.

## The Path Forward

The durability of meaningful progress depends on factors largely beyond any single actor's control. Protecting these gains requires coordinated action to restore external pressure, strengthen implementation capacity, support local advocacy, and address persistent structural barriers. Without intervention, the current trajectory points toward continued erosion and growing harms to workers.

For those working to eliminate forced labor in global supply chains, the Thai seafood case offers warning and guidance. Meaningful change is possible through coordinated action across government, business, and civil society. But that change remains fragile, dependent on continued attention, resources, and pressure.

The question facing funders, advocates, suppliers, and buyers is whether to accept erosion as inevitable or to mobilize the coordinated intervention that evidence suggests can protect and advance reform.