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POLICY SOLVE
ACHIEVING A BETTER TOMORROW THROUGH
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10 YEAR RETROSPECTIVE:
ADDRESSING FORCED LABOR & HUMAN TRAFFICKING IN THE THAI SEAFOOD AND FISHING INDUSTRIES

EXECUTIVE SUMMARY

September 2025

Acknowledgements

This publication is an independent research study supported with funding from Humanity United and the Freedom Fund. The research team was led by Jewlya Lynn, PolicySolve, LLC, with support from Patporn Phoothong, Roisai Wongsuban, and Kiran Obee. The findings, conclusions, and recommendations presented in this report are those of the authors alone.

The research team expresses sincere appreciation and gratitude for the deep involvement of stakeholders who contributed to this research project, including the migrant leaders and civil society leaders in Thailand who were generous in sharing their time and perspectives and the interviewee and discussion group participants across public, private, and non-profit sectors.

Thank you for the following people for providing feedback on the preliminary study findings:

- Paul Buckley, Independent
- Nuntawun Rujiwong, Thai Royal Frozen Food
- Hnin Wut Yee, Labour Rights Foundation
- Robert Pajkovski, Asia Deputy Regional Program Director, Solidarity Center
- Nichanan Tanthanawit, Greenpeace
- Andrew Wasuwongse, International Justice Mission Thailand
- Min Oo, Foundation for Education and Development
- Dr. Adisorn Promthep, retired civil servant
- Wasurat Homsud, Raks Thai Foundation
- Suthasinee Kaewlekiai, Labour Rights Foundation
- Nattaya Petchrat, Stella Maris Songkhla
- Thitar Oo, Raks Thai Foundation
- Sarah Mount, Independent
- Ame Sagiv, Humanity United
- Havovi Wadia, Freedom Fund
- Srikanth Gopal, Humanity United

Thank you to the following Humanity United team members for their contributions to the process and final product: Emily Risko and Mia Rabkin.

To cite this report, please use:

> Lynn, J. and Phoothong, P. (2025). *10 year retrospective: Addressing forced labor and human trafficking in the Thai seafood and fishing industries. Humanity United.*

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

The study methodology is a combination of descriptive qualitative analysis and causal mapping, deployed to make sense of how, why, and under what conditions change happened in a complex, dynamic environment. Findings are culled from a review of 135 documents (research studies, government studies, media articles, grant reports, and strategy documents, etc.) and interviews, focus groups, and sensemaking sessions with nearly 70 stakeholders across the system, including with migrant worker leaders. The study was deployed in several phases, with periods for stakeholder feedback and validation of findings built in throughout. The findings reflect the perspectives of the stakeholders and the previously documented evidence and do not necessarily represent the view of the study funders or the author.

Front cover image: © Jittrapon Kaicome/The Freedom Fund. Vessel in Samut Sakhon,Thailand.

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

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

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

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

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

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…

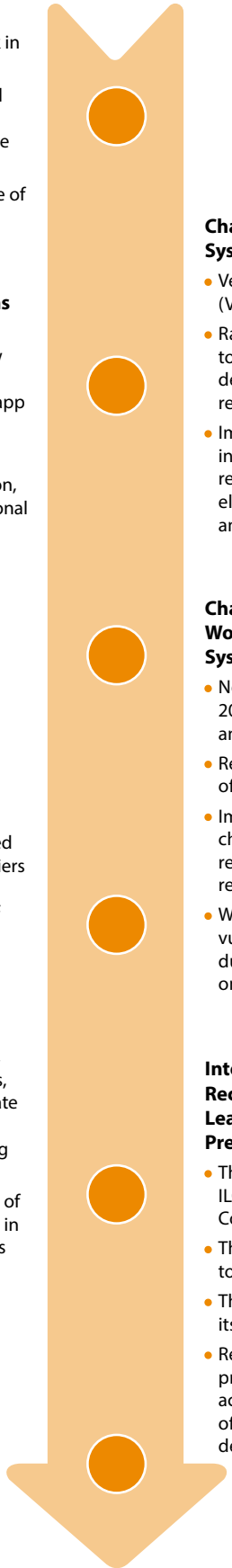
- A new legal framework in Thailand established
- A new Director General of the Department of Fisheries overseeing the regulatory overhaul
- The continued pressure of EU's yellow card

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

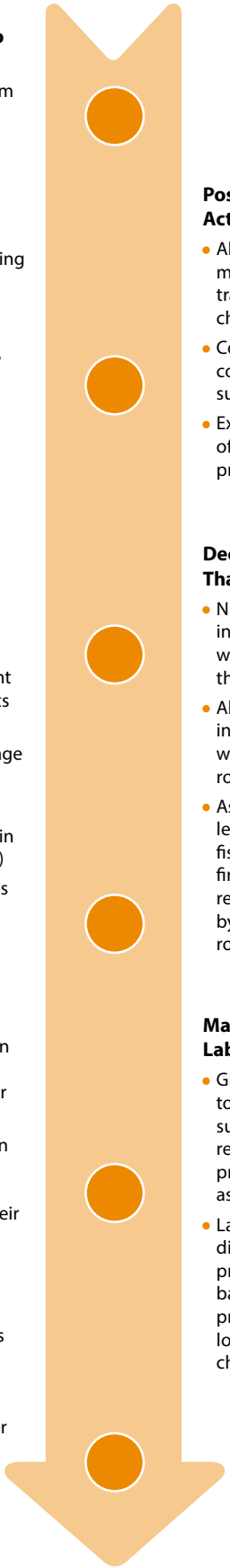
By 2023, Thailand's seafood sector faced a dual reality: **Reforms in processing had made significant progress** and, in many ways, were institutionalized, while fishing continued to show more persistent signs of forced labor. International pressure had eased compared to earlier years, but scrutiny did 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, directively, 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.

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

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.

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.

Endnotes

[1] Human Rights Watch. "Hidden Chains: Rights Abuses and Forced Labor in Thailand's Fishing Industry." Human Rights Watch, 2018. https://www.hrw.org/report/2018/01/23/hidden-chains/rights-abuses-and-forced-labor-thailands-fishing-industry; United Nations Inter-Agency Project on Human Trafficking (UNIAP). "Exploitation of Cambodian Men at Sea: Facts about the Trafficking of Cambodian Men onto Thai Fishing Boats." Bangkok: UNIAP, 2009. PDF.https://www.ilo.org/publications/exploitation-cambodian-men-sea-facts-about-trafficking-cambodian-men-thai; International Labour Organization. "Trafficking of Fishermen in Thailand." Bangkok: ILO, 2011. https://publications.iom.int/system/files/pdf/traffickingoffishermenthailand.pdf; Environmental Justice Foundation. "Thailand's Seafood Slaves: Human Trafficking, Slavery and Murder in Kantang's Fishing Industry." Environmental Justice Foundation, 2015

[2] Endnote 2: United Nations. "Thailand Migration Report 2024." Bangkok, Thailand: United Nations Network on Migration in Thailand, 2024. https://thailand.iom.int/sites/g/files/tmzbdl1371/files/documents/2024-12/thailand-migration-report-2024.pdf; International Transport Workers' Federation (ITF), Fishers' Rights Network (FRN). "ITF-FRN Thailand National Fisher Conditions Survey Results." Bangkok: ITF-FRN, January 2024. https://www.itfglobal.org/en/resources/itf-frn-thailand-national-fisher-condition-survey-results.

HUMANITY UNITED

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

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

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