



**Monterey Bay  
Aquarium**

# **Squid social risk profile**

Forced labor, human trafficking, and hazardous  
child labor risks

China, Fishing and Processing

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SEAFOOD SOCIAL RISK TOOL V2

## **Disclaimer**

The Seafood Social Risk Tool has been prepared for information purposes only, and is not intended to constitute business, legal, market, financial or investment advice. The Seafood Social Risk Tool is designed to serve as an informational resource and does not override legislation or internal policies or procedures. It is recommended that all users of the Seafood Social Risk Tool seek independent legal advice. The Monterey Bay Aquarium Foundation shall not be responsible to any party related to its use or interpretation of the information contained in the Seafood Social Risk Tool.

# Contents

About the Seafood Social Risk Tool.....	3
Overview.....	4
Base risks of forced labor, human trafficking, and hazardous child labor in the country in general.....	4
Adjusted risks of forced labor, human trafficking, and hazardous child labor in the country's seafood supply chain .....	6
Summary of evidence of forced labor, human trafficking, and hazardous child labor in the seafood supply chain.....	8
Summary of factors that affect the likelihood of forced labor, human trafficking, and hazardous child labor in the seafood supply chain .....	9
Fishing .....	12
Processing and Trade.....	13
Due Diligence for Squid in China.....	14
China: Country-level indicators .....	17
China: Seafood industry-level indicators .....	43
China: Fishing indicators .....	70
China: Processing indicators .....	91
References.....	96

# About the Seafood Social Risk Tool

The Seafood Social Risk Tool (SSRT) is a risk assessment tool that assesses the risks of forced labor, human trafficking, and hazardous child labor associated with a seafood product and producing country. The tool includes more than 80 risk indicators that assess evidence of forced labor, human trafficking, and hazardous child labor in seafood supply chains and the underlying drivers of risk associated with these abuses. This information is used to create risk profiles to help businesses and other interested stakeholders to better understand the risk of human rights abuses in seafood supply chains and to focus businesses' due diligence efforts to improve conditions for seafood workers.

To learn more about the SSRT and access the full list of available risk profiles, visit <https://www.seafoodwatch.org/our-projects/seafood-social-risk-tool>.

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## Overview

China is the world's largest squid producer, accounting for almost 35% (nearly one million metric tons, MMT) of global squid production in 2025.<sup>i</sup> China fishes for multiple species of squid in Chinese waters, in the high seas, and in other countries' waters. The main species of squid caught by China is Jumbo flying squid (*Dosidicus gigas*), which comprised nearly 44% of China's total squid fishing production in 2023.<sup>ii</sup> Notably, China possesses the largest distant-water fishing fleet globally, with the majority of its catch being squid.<sup>iii</sup> In 2022, the Chinese Government announced that the expansion of China's squid fleet will be restricted and there will be a limit on the number of boats permitted to operate in specific fishing areas throughout the year; however, the fleet continues to wield considerable influence in the worldwide squid fishing industry. China is also the world's largest squid processing country. According to 2022 data from the China Fisheries Statistics Yearbook, Fujian Province stands out as the leading region in China's marine fisheries production of squid, contributing to 72.7% of squid product output.<sup>iv</sup> In 2023, the main squid fishing and processing hubs were provinces Zhejiang, Shandong, and Fujian, accounting for 86% of total distant water fishery catch.<sup>v</sup> China also imports squid for processing, some of which supplies domestic consumption and some is exported.<sup>vi</sup> Squid is mainly imported and exported in frozen form, complemented by value-added products processed using methods like salting and drying.<sup>vii</sup>

## Base risks of forced labor, human trafficking, and hazardous child labor in the country in general

Overall, the base risks of forced labor, human trafficking, and hazardous child labor in China appear to be high. Factors contributing to an increased risk include inequalities between rural and urban areas of China combined with limited social protections for internal migrants; restrictions on freedom of association and poor enforcement of workers' rights; and a government-led policy of discrimination against minority ethnic and religious groups, including mass detention and state-imposed forced labor in the Xinjiang Uyghur Autonomous Region (Xinjiang or XUAR).

China is categorized as a "high human development" country in the Human Development Index, reflecting rapidly declining numbers of people in poverty and improving health and education rates.<sup>viii</sup> However, the country has high rates of income inequality regionally and between rural and urban areas, which have been worsened by the impacts of the COVID-19 pandemic.<sup>ix</sup> Internal migrants moving from rural to urban areas are especially vulnerable to forced labor due to the national household registry system known as *hukou* (in Chinese: 户口), which restricts the ability of rural inhabitants to legally change their residence and therefore to access social services in their new area of residence.<sup>x</sup> Policy reforms have resulted in improvements to the hukou system over time but further changes are needed to improve access to social services, especially for ethnic minorities.<sup>xi,xii</sup> Meanwhile, an inadequate and partial immigration framework poses a barrier for foreign migrant workers looking to establish themselves in China; restrictive visa policies and inadequate labor rights protection hinder the ability of workers to sustain employment in the country.<sup>xiii</sup> Workers' rights to organize are restricted by law and overall, there is "No guarantee of

rights” for workers in China, according to the International Trade Union Confederation’s 2024 Global Rights Index.<sup>xiv</sup> Anti-union discrimination is permitted in China and striking is prohibited, with examples recorded in 2021 and 2022 respectively, of labor advocates being arrested and detained for organizing workers and police violence against workers protesting over working conditions in Zhengzhou, Henan Province.<sup>xv</sup>

There is a lack of transparency around child labor, forced labor, and human trafficking in China. The country has not published official statistics on child labor.<sup>xvi</sup> Meanwhile, authorities only report limited, incomplete law enforcement data on trafficking cases and report inconsistently on efforts to protect victims.<sup>xvii</sup> While child labor laws appear to be generally enforced, there is evidence to suggest that enforcement of anti-trafficking and forced labor laws is insufficient. China has demonstrated some recent efforts to eliminate human trafficking, for example, through the adoption of a new Action Plan to Combat Trafficking in Persons (2021-2030) in April 2021,<sup>xviii</sup> and the provision of increased funding for training of law enforcement in 2022.<sup>xix</sup> However, trafficking crimes are usually prosecuted under laws relating to other offences that carry lesser penalties and forced labor crimes are sometimes treated as administrative issues.<sup>xx</sup>

There are also concerns about the employment of North Korean workers in China. North Korean overseas labor is alleged to comprise forced labor by the North Korean government.<sup>xxi</sup> A 2024 report by the Office of the United Nations High Commissioner for Human Rights identifies overseas labor as one of several types of forced labor in North Korea. Workers are sent to work overseas either voluntarily or forcibly to earn foreign currency for the state and are subject to strict controls and surveillance to ensure compliance with rules and regulations set by the North Korean government.<sup>xxii</sup> The report connects several indicators of forced labor to North Korean overseas labor including extended working hours under coercion and without proper pay, wage withholding and excessive wage deductions, isolation of workers and restrictions on freedom of movement, threats and intimidation against workers, retention of identity documents, and abusive living conditions without proper food and health care.<sup>xxiii</sup>

Most significantly, the Chinese government has itself been implicated in a pattern of widespread forced labor involving minority ethnic and religious groups in Xinjiang. International concerns over human rights violations in China have increased significantly since evidence emerged on the government’s campaign against Uyghurs, ethnic Kazakhs, ethnic Kyrgyz, and members of other minority groups in Xinjiang.<sup>xxiv</sup> Documented human rights abuses include coercive population control methods, forced labor, and arbitrary detention in internment camps.<sup>xxv</sup> Despite significant international attention on the human rights situation and the cutting of international supply chain links to Xinjiang, the Chinese government denies these accusations and local officials obstruct access for observers, impeding international investigations into the allegations of forced labor in Xinjiang.<sup>xxvi</sup>

# Adjusted risks of forced labor, human trafficking, and hazardous child labor in the country's seafood supply chain

China's seafood industry has been connected to evidence of forced labor and human trafficking, including the alleged use of North Korean labor in the country's distant water fishing (DWF) fleet, which includes squid fishing vessels, and to the alleged use of state-sanctioned Uyghur forced labor and North Korean labor in seafood processing, including potentially in squid processing. No direct evidence was found of hazardous child labor across China's seafood industry or more specifically in squid fishing and processing.

There is substantial evidence connecting China's fishing fleet to fisheries-related crimes, including human rights abuses and illegal fishing. Belhabib and Le Billon (2022) finds that at least 33% of all observed fisheries-related offenses across the world's oceans between 2000 and 2020 are associated with 450 industrial vessels and 20 companies originating from China, the EU, and tax haven jurisdictions. Where companies could be connected to offending vessels, 50% of companies were found to be based in China and accounted for 20% of the offenses.<sup>xxxvii</sup>

Many of China's DWF vessels have been found to harbor serious human rights abuses including conditions indicative of forced labor.<sup>xxxviii</sup> Chinese fishing fleets depend extensively on foreign migrant labor predominantly from Indonesia.<sup>xxxix</sup> Migrant workers are often recruited through employment agencies that incorporate undisclosed expenses and upfront recruitment fees into their contracts, leading to debt bondage.<sup>xxx</sup> This practice increases the vulnerability of migrant workers to exploitation. Deceptive recruitment practices, including false promises about wages and terms of the contract are used to hire fishers.<sup>xxxi</sup> Other reported indicators of forced labor include overwork, underpayment or nonpayment of wages, abusive living conditions, isolation at sea, confiscation of identity documents, verbal abuse and physical violence, sometimes leading to the deaths of workers.<sup>xxxii,xxxiii</sup> In 2021, the US Customs and Border Protection issued a Withhold Release Order on seafood from fishing vessels owned or operated by the Chinese company, Dalian Ocean Fishing Co., Ltd based on an investigation that found all 11 of the International Labour Organization (ILO)'s indicators of forced labor.<sup>xxxiv</sup> In 2025, Environmental Justice Foundation (EJF) also revealed the suspected use of North Korean labor, which could amount to forced labor, onboard Chinese tuna longliners in the DWF fleet.<sup>xxxv</sup>

Squid fishing vessels in China's DWF fleet have been specifically linked to alleged cases of forced labor and indicators of forced labor. In October 2023, The Outlaw Ocean Project published the findings of an investigation into the conditions of China's DWF fleet, with the investigation revealing instances of forced labor on 29 squid fishing vessels and the risk of forced labor on 59 other ships. Documented abuses included wage theft, physical violence, retention of identity documents, deprivation of food and drinking water and restricted access to medical care. At least 24 workers were identified to be suffering from beriberi, a disease caused by malnutrition.<sup>xxxvi</sup> More recently in 2025, an investigation by EJF into the Argentine shortfin squid fishery in the Southwest Atlantic connected Chinese squid fishing vessels to forced labor with interviews with former crew members revealing pervasive issues of physical violence.<sup>xxxvii</sup>

The correlated risks of illegal, unreported, and unregulated (IUU) fishing and transshipment have also been linked to China's DWF fleet. According to The Outlaw Ocean Project, between 2015 and 2019, satellite data and at-sea reporting indicate that a minimum of 170 Chinese squid vessels were involved in illicit, unauthorized, or unregulated fishing in the waters around Yemen and Oman.<sup>xxxviii</sup> Of the 751 Chinese squid vessels studied by The Outlaw Ocean Project's investigation, more than 100 vessels were found to have engaged in IUU fishing.<sup>xxxix</sup> Opaque bilateral agreements with coastal countries and weak regulations enable DWF companies to conduct IUU fishing.<sup>xl</sup> Concerns have been expressed by the international community and fishing observers about China's limited oversight of the DWF fleet, which contributes to an increased risk of forced labor.<sup>xli,xlii,xliii</sup> Ownership of DWF vessels is highly fragmented, with many vessels owned by small or medium-sized enterprises that are potentially acting as subsidiaries of larger corporations, which results in reduced supply chain transparency and accountability.<sup>xliv</sup> Moreover, while China is not designated as a flag of convenience (FOC) by the ITF's fair practices committee, it is recognized for the utilization of foreign vessel registries including FOCs within its DWF fleet. Gutiérrez *et al.* (2020) identified nearly 1,000 Chinese DWF vessels registered in other countries, of which 518 were flagged to African nations and 148 vessels were registered in nations commonly regarded as flags of convenience.<sup>xlv</sup> In 2017, Beijing pledged to limit the DWF fleet to 3,000 vessels under pressure from environmental groups, but this number excludes the growing fleet of Chinese-owned ships registered under other countries' flags.<sup>xlvi</sup> In recent years, China has gained access to restricted fishing areas in regions like South America, Africa, and the Pacific by registering foreign vessels under other countries' flags through business partnerships, allowing them to fish in those waters.<sup>xlvii</sup> For example, EJF used ownership records to estimate that about 54% of licensed squid-jigging vessels in Argentina's exclusive economic zone, all required to fly the Argentine flag, were ultimately controlled by Chinese companies in 2024.<sup>xlviii</sup> Vessels linked to a controlling company have previously been associated with alleged human rights and environmental abuses while operating under the Chinese flag.<sup>xlix</sup>

Nonetheless, some positive legislative changes have been observed in the fishing industry. Most recently, in April 2025 China ratified the Port State Measures Agreement, indicating the country's commitment to combatting IUU fishing, and China is working to amend its legislation to align with the international agreement.<sup>i</sup> To monitor ocean fishery populations and improve supply chain traceability, the Maritime Traffic Safety Law was revised, and the protection of crew's rights was added in this provision for the first time in 2021: a fundamental provision that the State must ensure the safety of labor, occupational health, and legitimate rights and interests of sailors.<sup>ii</sup> It involves several crew rights, including ensuring the seafarers' environment, protecting their interests and health, and providing social insurance. However, due to the characteristics of DWF, enforcement is low, and the regulation is ineffective in solving existing problems. Moreover, shortcomings in the catch verification methodology, loopholes created by the role of transshipment vessels, and a lack of concrete enforcement measures pose significant obstacles.

There is also evidence implicating China's seafood processing industry in the use of Uyghur labor and North Korean labor, which can be considered forced labor. The 2023 investigation by The Outlaw Ocean Project alleges that Uyghur labor and North Korean labor is used in seafood

processing in China, including potentially in squid processing. According to the findings of the investigation, ten major seafood companies in Shandong Province have participated in forced labor transfer programs from Xinjiang since 2018, receiving over a thousand Uyghurs and other Muslim minorities. Notably, processing plants owned by three of these conglomerates have contributed to 17% of all squid exported from China to the United States over the past five years.<sup>lii</sup> In addition, North Korean labor is reportedly being used in seafood processing plants in Liaoning Province, including by seafood processing companies known to have exported seafood including squid to the United States.<sup>liii</sup> The employment of North Korean workers who are mostly women in Chinese seafood processing plants has been linked to reports of physical and sexual abuse, deceptive recruitment practices, workers' identity documents being confiscated, isolation and restricted movement, surveillance, long working hours, unsafe working conditions, debt incurred in North Korea to secure overseas work, discrimination in the form of lower wages than Chinese workers, unpaid overtime, and wage deductions by the North Korean government.<sup>liv,lv</sup> Challenges in implementing effective social audits make it difficult to determine whether processing plants are employing the use of Uyghur labor and North Korean labor.<sup>lvi</sup>

## Summary of evidence of forced labor, human trafficking, and hazardous child labor in the seafood supply chain

### Country-level indicators

- China has been implicated in a state-sponsored campaign of mass detention, human trafficking, and forced labor against Uyghur Muslims and other ethnic and religious minority groups in Xinjiang, with goods produced by forced labor linked to international supply chains.
- In addition, the North Korean government allegedly subjects its people to forced labor in China as part of a revenue generation effort.
- Forced labor occurs in the production of various goods including artificial flowers, Christmas decorations, coal, fish, footwear, and garments products, among others. Goods identified as produced by child labor and forced labor include bricks, cotton, electronics, and fireworks.

### Seafood industry-level indicators

- No direct evidence was found of hazardous child labor in China's seafood industry, but there is evidence of human trafficking and forced labor in the seafood industry.
- 'Fish' from China is identified as a good produced by forced labor by the US Department of Labor's 2024 List of Goods Produced by Child Labor or Forced Labor, with specific reference to China's distant water fishing (DWF) fleet.
- Evidence from an investigation by Environmental Justice Foundation published in 2025 indicates that North Korean labor may have been used on at least 12 Chinese-flagged tuna longliners operating in the Indian Ocean.

- Evidence from investigative journalism reported by The Outlaw Ocean Project in 2023 suggests that state-sanctioned Uyghur forced labor and North Korean labor is used in China’s seafood processing industry.
- The US Department of State’s Trafficking in Persons Report states that Uyghur and other Muslim ethnic minority workers and North Korean overseas workers are subject to conditions of forced labor in seafood processing.

### Fishing indicators

- There is evidence linking China’s DWF fleet, including the squid fishing industry to forced labor and indicators of forced labor.
- ‘Squid’ from China is identified as a good produced by forced labor by the US Department of Labor’s 2024 List of Goods Produced by Child Labor or Forced Labor.
- Documented abuses include wage theft, debt bondage, physical violence, retention of identity documents, deprivation of food and drinking water and restricted access to medical care.

### Processing indicators

- There is evidence linking China’s squid processing industry to forced labor. The 2023 investigation by The Outlaw Ocean Project alleges that Uyghur labor and North Korean labor are used in seafood processing in China, including potentially in squid processing.
- Major seafood companies in Shandong Province, which contributed to 17% of all squid exported from China to the United States over the past five years, have been connected to state-sanctioned forced labor transfer programs from Xinjiang.
- Seafood processing plants in Liaoning Province, which export squid and other seafood products to the United States, have been connected to the use of North Korean labor.

## Summary of factors that affect the likelihood of forced labor, human trafficking, and hazardous child labor in the seafood supply chain

### Factors that increase the likelihood

#### Country-level indicators

- No guarantee of workers’ rights, including restrictions on the right to freedom of association and collective bargaining, and a prohibition on the right to strike.

- An increased migration movement without proper policies that encourage both foreign and internal migrants to adapt to a new environment.
- Inequalities between rural and urban areas affect access for workers to social protections and administrative constraints make it difficult for workers and their families to access social protection, health, and education when relocating from rural to urban areas.
- Non-transparent and insufficient enforcement of anti-trafficking laws, alongside allegations of official complicity in human trafficking.

### **Seafood industry-level indicators**

- The distant water fishing (DWF) fleet is the world's largest and operates with limited oversight.
- Many illegal and unregistered agencies are present and recruit workers from other Asian countries into fishing using false promises with migrant workers leaving the vessel without wages.
- There is insufficient oversight of labor conditions and recruitment agencies in the fishing industry, including a lack of screening for indicators of forced labor among migrant fishers.

### **Fishing indicators**

- Chinese squid fishing vessels spend extended periods of 10 to 12 months at sea and frequently utilize the practice of transshipment.
- There are concerns regarding the sustainability of global squid fisheries.
- Difficulties in monitoring extensive bounds and a vast number of DWF vessels.
- Widespread illegal, unreported, and unregulated (IUU) squid fishing and forcing of crew members to engage in illegal activities on board.
- China's DWF squid fleet frequently uses flags of convenience.
- Chinese squid jiggers have been reported using multiple electronic identities and disabling their mandatory location transponders to evade monitoring and engage in "dark" operations.
- Fishers are often employed via recruitment agencies that charge fees to the workers.
- Deception by recruitment agencies is prevalent, and fishers often suffer from overworking under poor labor conditions.

### **Processing indicators**

- There is limited information about the workforce and employment practices in squid processing but Uyghur laborers and North Korean laborers, who are considered highly vulnerable to forced labor, are thought to be employed in squid processing.

## Factors that decrease the likelihood

### Country-level indicators

- China is primarily a source country for migrant workers rather than a destination country.
- Education and literacy levels in China are high and comparably better than in some neighboring countries.
- China became a Party to the Agreement on Port State Measures (PSMA) in April 2025 to help combat IUU fishing.
- China's State Council published a national Action Plan against Trafficking in Persons (2021–2030) in 2021.

### Seafood industry-level indicators

- Provisions for crew rights were added to the Maritime Traffic Safety Law in 2021 to improve basic labor conditions.
- An overhaul of China's 1986 Fisheries Law was recently conducted to amend the patchy legal framework.
- China's Agriculture Ministry dispatched observers for the first time in 2021 to monitor transshipments and the legality of catches by high seas vessels in the Pacific and Indian oceans.
- China has introduced measures in the past decade to address IUU fishing including improved vessel monitoring, training on regulations, a blacklist for noncompliant DWF skippers and for vessels engaging in IUU fishing or failing to accurately report their positions, and the removal of fuel subsidies for DWF companies and vessels involved in IUU fishing.
- China is committed to including its fishing vessels in the global registry, strengthening cooperation with the International Maritime Organization (IMO), and requiring DWF vessels to obtain IMO identification numbers.

### Fishing indicators

- At least half of China's large fishing vessels (over 24 m) appear to regularly use AIS.
- China is making efforts to reduce its reliance on foreign labor by shifting to recruiting more fishing vessel workers from within China.
- Fishers are employed with written agreements (although these are mostly written in Chinese rather than the language of the worker).

### Processing indicators

- All or most North Korean workers were repatriated back to North Korea in 2023, though investigative reporting suggests that the North Korean government planned to send more workers to China after that.

# Fishing

The seafood industry in China is valued at more than thirty-five billion dollars, constitutes a fifth of global trade, and has played a role in the creation of fifteen million jobs.<sup>lvii</sup> China was responsible for nearly one million metric tons (MMT) of global squid fishing production in 2025, accounting for nearly 35% of global squid production.<sup>lviii</sup> Multiple species of squid are targeted by China's domestic fleet within its exclusive economic zone (EEZ), and by the country's distant water fishing (DWF) fleet in the high seas and in the EEZs of other countries. China's squid fishery operates in various regions including the Pacific, Atlantic, and Indian Oceans, with a concentration of fishing operations in the northwest Pacific, western central Pacific, southeast Pacific, and southwest Atlantic.<sup>lix,lx</sup> Squid species caught by China include Jumbo flying squid (*Dosidicus gigas*), Various Squids Nei (*Loliginidae* and *Ommastrephidae*), and Argentine shortfin squid (*Illex argentinus*).<sup>lxi</sup> The main species caught by China is Jumbo flying squid (*Dosidicus gigas*), which amounted to nearly 44% of China's total squid fishing production in 2025.<sup>lxii</sup> The primary region for harvesting jumbo squid is the Southeast Pacific Ocean.<sup>lxiii</sup>

China's DWF fleet is the largest in the world,<sup>lxiv</sup> and primarily targets squid.<sup>lxv</sup> National reporting indicates that as of 2022, China approved 177 DWF enterprises and 2,551 vessels (including 1,498 high seas fishing vessels), actively engaged in high seas operations across the Pacific, Indian, and Atlantic oceans, along with the seas surrounding Antarctica, and waters under the jurisdiction of cooperating nations.<sup>lxvi</sup> The annual total catch of the DWF reached approximately 2.33 million tonnes in 2022.<sup>lxvii</sup> Fishing gears used by China to target squid include bottom and midwater trawls, gillnets, hook and line, handlines and mechanized lines, lift nets, and purse seine gear.<sup>lxviii</sup> An analysis by ODI suggests that trawls are the most used gear type by the DWF, followed by line gears.<sup>lxix</sup>

Significant international attention has been given to China's DWF fleet and its activities, which have prompted concerns and scrutiny from environmental non-governmental organizations, media, and academia about the size of the fleet, a lack of transparency around its activities, and issues such as unsustainable and illegal, unreported, and unregulated (IUU) fishing.<sup>lxx,lxxi</sup> In response to this international scrutiny, the Chinese government expressed its stance on combating IUU fishing and supporting sustainable fishing for the first time in 2017, but the activities of the DWF fleet continued to raise concerns into 2020 and beyond.<sup>lxxii</sup> In recent years, China has introduced several measures aimed at regulating the extent of its fleet's fishing activities.<sup>lxxiii</sup> This includes setting limits on fishing vessels in Chinese waters in 2021 and implementing restrictions in five squid fishing areas spanning the Pacific and Indian oceans in 2022. Despite these initiatives, environmental organizations have expressed doubt regarding the effectiveness and transparency of China's efforts. Common issues cited include the under-reporting of catches in international waters and suspicions of illegal fishing activities.<sup>lxxiv</sup>

## Processing and Trade

China is a major processing and trade hub in global seafood supply chains, importing and processing seafood for re-export to Europe, Japan, and the United States.<sup>lxxv</sup> The main squid fishing and processing hubs in 2023 were provinces Zhejiang, Shandong, and Fujian.<sup>lxxvi</sup> Rongcheng City in Shandong Province is an important distribution center for marine aquatic products and stands out as China's largest center for squid processing. With an annual squid processing volume surpassing 400,000 tons, it represents about 70% of the squid catch and approximately 50% of the national total.<sup>lxxvii</sup>

In addition to operating a squid fishing industry, China also imports squid for processing, some of which supplies domestic consumption and some is exported.<sup>lxxviii</sup> The primary imported item is frozen squid, making up approximately 93% of the total.<sup>lxxix</sup> Additional products encompass live squid and smoked squid, with significant countries of origin including the Republic of Korea (for live squid) and Vietnam (for smoked and other varieties).<sup>lxxx</sup> China exported 532,988 tonnes of squid and cuttlefish in 2022.<sup>lxxxi</sup> Around 19%, or 100,441 tonnes, went to Japan, 14% (75,614 tonnes) went to Thailand, and 10% (54,281 tonnes) to the Republic of Korea.<sup>lxxxii</sup> China's exports of frozen cuttlefish and squid (HS 03074310) show a consistent downward trend from 2021 to 2025, with the United States, the Philippines, Spain, Thailand, and Chinese Taipei continuing to serve as major destination markets despite declining trade values.<sup>lxxxiii</sup> At the same time, China's imports of frozen cuttlefish and squid have generally increased over the period, with Indonesia remaining the dominant supplier and the United States, Malaysia, India, and Pakistan also contributing significant volumes.<sup>lxxxiv</sup>

The squid processing sector has witnessed significant advancements concurrent with the growth of China's processing industry. Domestic enterprises engaged in squid processing are consistently enhancing their processing equipment and refining production processes to optimize the efficient utilization of their products.<sup>lxxxv</sup> The processing techniques for squid vary depending on the product category. A diverse range of semi-finished squid products, employing different technologies, are available and are primarily categorized into two groups: those undergoing skin treatments and those undergoing peeling treatments.<sup>lxxxvi</sup> Within the peeling treatment category, the products include squid tentacles, squid heads, squid plates, whole beans, frozen squid, among others. In the moulting treatment category, the products consist of peeling squid rings, peeling squid tubes, squid stalks, ear stalks, and similar items.<sup>lxxxvii</sup> Rongcheng is China's largest squid processing hub, handling over 40% of the nation's annual volume, and in the first 11 months of 2025 its squid exports reached 4.334 billion yuan, up 26.5% year-on-year.<sup>lxxxviii</sup>

# Due Diligence for Squid in China

## Important Country-Specific Considerations

- China has imposed a government-led policy of discrimination against minority ethnic and religious groups that has been linked to allegations of mass detention and state-sanctioned forced labor in the Xinjiang Uyghur Autonomous Region (Xinjiang).
- Ineffective enforcement of forced labor laws and a lack of measures to protect workers, as well as official complicity increase the vulnerability of workers to exploitation.
- China's seafood industry has been connected to evidence of human trafficking and forced labor, including the alleged use of North Korean labor in fishing and state-sanctioned Uyghur labor and North Korean labor in processing.
- Illegal, unreported, and unregulated (IUU) fishing, transshipment, and the use of flags of convenience hinder transparency in China's distant water fishing fleet.
- Limited information was found on work in squid processing in China due to a lack of transparency.

## Suggested Due Diligence Priorities & Questions

### Worker demographics

Little information was found on the workforce in squid fishing and processing in China. The employment of vulnerable Uyghurs and other ethnic minorities, as well as migrant workers from North Korea in seafood processing is a forced labor risk.

1. What proportion of squid processing workers are foreign or internal migrant laborers?
2. Where do migrant workers originate from and what languages do they speak?
3. What proportion of squid processing workers are ethnic minorities?
4. What proportion of squid processing workers are considered low-skilled?
5. What is the proportion of temporary and contract workers versus permanent workers employed in squid processing?
6. What is the proportion of women employed in the squid processing workforce?

## **Recruitment**

Migrant laborers in the Distant Water Fishing (DWF) fleet are enlisted through private recruitment agents and intermediaries, leading to significant expenses for the workers. These fees, amounting to several months' wages, cover various costs including travel to the vessel, training, insurance, accommodation, crew certifications, medical exams, and provisions for food and protective work attire.

1. What procedures are in place to manage recruitment agents and intermediaries, including those operating in foreign countries? Are there screening and evaluation processes prior to engaging with recruitment agents?
2. Do you know how recruitment agents comply with the 'Employer Pays Principle', including whether they have a procedure for verifying that workers are not charged fees and a mechanism for workers to report violations?
3. What procedures are in place to ensure workers have unrestricted access to their documents (such as identity documents and work agreements)?
4. Do migrant workers receive training to help understand the terms of their recruitment contracts and safely perform their work?

## **Contracts and Compensation**

Fishers' contracts in the DWF fleet are often written in Chinese, a language unfamiliar to the workers, exposing them to potential exploitation as they lack a complete understanding of the terms. Furthermore, these contracts involve undisclosed expenses and initial recruitment fees, leading to situations of debt bondage. The employment of North Korean workers in Chinese seafood processing plants has been linked to reports of lower wages than Chinese workers, unpaid overtime, and wage deductions by the North Korean government.

1. Are contracts written in a language that workers understand?
2. How are the workers being paid (e.g., piece rate, fixed monthly salary, catch share)?
3. Do workers receive a pay slip and are they able to dispute incorrect payments or wage deductions?

### **Processing activities**

Global squid supply chains are highly complex, with limited transparency and traceability. Chinese DWF vessels use foreign vessel registries to operate under foreign flags including flags of convenience, engage in transshipment, and have been linked to illegal, unreported, and unregulated fishing. Meanwhile, imports of squid for processing and re-export further hinder transparency in the supply chain.

1. Do you know where processing companies are sourcing their squid inputs?
2. Is there traceability back to the fishing vessels including information on vessel flags and fishing areas?
3. Can the ownership of fishing vessels be traced back to the beneficiary?
4. Does the company know what working conditions are like on the fishing vessels?
5. Does the company offer mechanisms that empower suppliers to have greater control or visibility within their supply chain, in cases where the traceability of suppliers' products is uncertain or cannot be assured?

## China: Country-level indicators

Indicator	Description	Sources
Poverty levels in a country	<p>Human Development Index</p> <p>HDI Value (2022): 0.788</p> <p>HDI Rank (2022): 75</p> <p>China's HDI value for 2022 places it in the 'high human development' category and positions it 75<sup>th</sup> out of 193 countries and territories.</p> <p>China's HDI value for 2022 is above the average of 0.766 for countries in East Asia and the Pacific.</p> <p>China shows progress against each of the HDI indicators for income, health, and education from 1990 to 2022. However, when China's HDI value is discounted for inequality, it falls to 0.662, a loss of 16% due to inequality in the distribution of the HDI dimension indices. The average loss due to inequality for high HDI countries is 17.8% and for countries in East Asia and the Pacific it is 16.4%.</p>	<p><a href="#">UNDP Human Development Index</a></p> <p><a href="#">UNDP Country Profile: China</a></p>
	<p>Poverty headcount ratio at national poverty line (% of population): 0% (2020), showing a decrease over 19 years from 49.8% (2000).</p> <p>The poverty headcount ratio is considerably lower in China than that of its neighboring countries:</p> <ul style="list-style-type: none"> <li>• Afghanistan (2016) 54.5%</li> <li>• Bhutan (2012) 12.4%</li> <li>• India (2011) 21.9%</li> <li>• Kazakhstan (2022) 5.2%</li> <li>• Kyrgyz Republic (2021) 33.3%</li> <li>• Lao PDR (2018) 18.3%</li> <li>• Mongolia (2020) 27.8%</li> <li>• Myanmar (2017) 24.8%</li> <li>• Nepal (2010) 25.2%</li> <li>• North Korea (No information available)</li> </ul>	<p><a href="#">World Bank</a></p>

Indicator	Description	Sources
	<ul style="list-style-type: none"> <li>• Pakistan (2018) 21.9%</li> <li>• Russian Federation (2020) 12.1%</li> <li>• Tajikistan (2022) 22.5%</li> <li>• Vietnam (2020) 4.8%</li> </ul>	
	<p>Global Hunger Index (2023): &lt;5</p> <p>China ranks 1-20<sup>th</sup> out of 136 qualifying countries. With a score of less than 5 out of 100, China suffers from a level of hunger that is 'low'.</p> <p>China scores at a lower rate of hunger than neighboring countries, Afghanistan (30.6), India (28.7), Laos (16.3), Myanmar (16.1), Nepal (15.0), Pakistan (26.6), Tajikistan (13.7), and Vietnam (11.4), with a 'moderate' to 'serious' level of hunger. China suffers from a similar level of hunger to neighboring countries, Kazakhstan (5.5), Kyrgyz Republic (7.5), Mongolia (7.5), and the Russian Federation (5.8), with a 'low' level of hunger. Neighboring countries, Bhutan, and North Korea were not listed.</p> <p>Note: GHI is scored on a 100-point GHI Severity Scale, where 0 is the best score (no hunger) and 100 is the worst (where ≥ 50 is 'extremely alarming').</p>	<a href="#">Global Hunger Index (GHI)</a>
<p>Country's position in the regional economic power system</p>	<p>Comparing HDI ranking to other countries in the region</p> <p><b>China</b> HDI Value (2022): 0.788 HDI rank (2022): 75</p> <p>Neighboring Countries:</p> <p><b>Afghanistan</b> HDI Value (2022): 0.462 HDI Rank (2022): 182</p> <p><b>Bhutan</b> HDI Value (2022): 0.681 HDI Rank (2022): 125</p> <p><b>India</b> HDI Value (2022): 0.644 HDI Rank (2022): 134</p> <p><b>Kazakhstan</b> HDI Value (2022): 0.802</p>	<a href="#">UNDP Human Development Index</a>

Indicator	Description	Sources
	<p>HDI Rank (2022): 67  <b>Kyrgyz Republic</b>  HDI Value (2022): 0.701  HDI Rank (2022): 117  <b>Lao PDR</b>  HDI Value (2022): 0.620  HDI Rank (2022): 139  <b>Mongolia</b>  HDI Value (2022): 0.741  HDI Rank (2022): 96  <b>Myanmar</b>  HDI Value (2022): 0.608  HDI Rank (2022): 144  <b>Nepal</b>  HDI Value (2022): 0.601  HDI Rank (2022): 146  <b>North Korea</b>  HDI Value (2022): Not rated  HDI rank (2022): Not rated  <b>Pakistan</b>  HDI Value (2022): 0.540  HDI Rank (2022): 164  <b>Russian Federation</b>  HDI Value (2022): 0.821  HDI Rank (2022): 56  <b>Tajikistan</b>  HDI Value (2022): 0.679  HDI Rank (2022): 126</p>	
	<p>Comparing its recent economic growth to the general economic growth rates in the region</p> <p><b>China</b>  GDP Growth (annual %): 3.0 (2022), compared to 8.4 (2021)</p> <p>Neighboring countries:</p> <p><b>Afghanistan</b>  GDP Growth (annual %): -20.7 (2021), 3.9 (2019)</p> <p><b>Bhutan</b>  GDP Growth (annual %): 4.1 (2021), 5.76 (2019)</p> <p><b>India</b></p>	<p><a href="#">World Bank Databank figures on annual economic growth</a></p>

Indicator	Description	Sources
	<p>GDP Growth (annual %): 7.2 (2022), 3.74 (2019)  <b>Kazakhstan</b>  GDP Growth (annual %): 3.2 (2022), 4.5 (2019)  <b>Kyrgyz Republic</b>  GDP Growth (annual %): 7.0 (2022), 4.6 (2019)  <b>Lao PDR</b>  GDP Growth (annual %): 2.7 (2022), 5.5 (2019)  <b>Mongolia</b>  GDP Growth (annual %): 4.8 (2022), 5.6 (2019)  <b>Myanmar</b>  GDP Growth (annual %): 3.0 (2022), 6.8 (2019)  <b>Nepal</b>  GDP Growth (annual %): 5.6 (2022), 6.7 (2019)  <b>North Korea</b>  GDP Growth (annual %): No Data  <b>Pakistan</b>  GDP Growth (annual %): 6.2 (2022), 2.5 (2019)  <b>Russian Federation</b>  GDP Growth (annual %): -2.1 (2022), 2.2 (2019)  <b>Tajikistan</b>  GDP Growth (annual %): 8.0 (2022), 7.4 (2019)</p>	
	<p>Migration data  The net migration rate (immigrants minus emigrants per 1,000 population) for China is -0.1 (2021).</p>	<p><a href="#">IOM Migration Data Portal: China</a></p>
	<p>Regional migration trends and patterns  China is primarily a source country for migrant workers and to a lesser extent also a destination country. <a href="#">International Organization for Migration, No date</a>  Migration trends in China are largely driven by economic factors, with citizens migrating overseas in search of economic opportunities and internally from rural areas to manufacturing hubs in coastal areas.  According to United Nations estimates, over 10 million Chinese nationals lived abroad in 2020. Chinese nationals typically migrate to Europe and North America for work and family reunification, and</p>	<p><a href="#">International Organization for Migration, No date, 'China'</a>  <a href="#">Migration Policy Institute, 28 January 2022, 'China's Rapid Development Has Transformed Its Migration Trends'</a></p>

Indicator	Description	Sources
	<p>increasingly also for study. Many people migrate internally to other regions, with nearly 376 million people residing somewhere other than their household registration area in 2020.</p> <p>Increasingly, China has attracted foreign migrants, primarily from South Korea, the United States and Japan. In 2020, 1.4 million overseas residents were living in mainland China. This number includes 846,000 foreign nationals and 585,000 residents of Hong Kong, Macao, and Taiwan, but does not count people with irregular status. Around one-third of immigrants reside in the southern province of Guangdong, which is a major manufacturing area. Guangdong province has an especially diverse foreign-born population including people from Africa and South Asia. Foreign migrant workers include foreign experts, investors, and traders.</p> <p>Most recently, China’s migration trends have been affected by the COVID-19 pandemic. China’s “zero-COVID” strategy resulted in strict border restrictions, which significantly limited movement over 2020 and 2021. <a href="#">Migration Policy Institute, 28 January 2022</a></p>	
	<p>Known human trafficking routes</p> <p>China is a source, transit, and destination country for human trafficking. Human traffickers exploit Chinese victims in China and abroad. Traffickers also exploit foreign victims in China and use China as a transit country to traffic foreign victims to other countries in Asia and in international maritime industries. Men from countries in Africa and Asia are subject to conditions indicative of forced labor on Chinese-flagged and Chinese-owned, foreign-flagged fishing vessels operating worldwide in China’s distant water fishing fleet. Women and girls from China are subject to sex trafficking within China and abroad. Women and girls from South Asia, Southeast Asia, and Africa are subject to labor trafficking and sex trafficking in China.</p>	<p><a href="#">US Department of State, 2024, 2024 Trafficking in Persons (TIP) Report</a></p> <p><a href="#">Migration Policy Institute, 28 January 2022, ‘China’s Rapid development Has Transformed Its Migration Trends’</a></p>

Indicator	Description	Sources
	<p>Trafficking for forced labor also occurs within China under the authority of the government. Since 2017, more than one million ethnic Muslims, including Uyghurs, ethnic Kazakhs, and ethnic Kyrgyz among others, have been detained in internment camps to erase ethnoreligious identities. Thousands of people have reportedly been transported to other provinces for forced labor under the premise of poverty alleviation, with thousands more convicted for dubious charges and transported to prisons throughout the country where they are subject to conditions indicative of forced labor. <a href="#">US Department of State, 2024</a></p> <p>Many people remained ineligible to leave China through regular channels. Unmet migration aspirations laid the foundation for a smuggling industry involving transnational networks of Chinese brokers who sometimes demanded steep fees or forced service. However, intense Western media attention on human smuggling from China was arguably disproportionate to the problem's scale. <a href="#">Migration Policy Institute, 28 January 2022</a></p>	
<p>Governance practices and systems in a country (measured through indexes)</p>	<p>WGI (2022) Percentile rank:</p> <ul style="list-style-type: none"> <li>• Voice and Accountability: 6.28</li> <li>• Political Stability and Absence of Violence: 28.30</li> <li>• Government Effectiveness: 68.40</li> <li>• Regulatory Quality: 36.79</li> <li>• Rule of Law: 52.83</li> <li>• Control of Corruption: 55.19</li> </ul> <p>China's percentile ranks range between 6.28 and 68.40. "Voice and Accountability" is the lowest ranked indicator at 6.28 and is ranked significantly less than the regional percentile rank for East Asia and Pacific of 56.82. Its other indicators rank in the mid-percentiles. In general, China scores lower than average for the six indicators compared to</p>	<p><a href="#">World Governance Indicators (WGI)</a></p>

Indicator	Description	Sources
	<p>neighboring countries in the East Asia and Pacific region but higher in the Government Effectiveness category.</p> <p>Note: Percentile rank among all countries ranges from 0 (lowest) to 100 (highest) rank, where the higher the percentiles, the better the governance.</p>	
	<p>Corruption Perception Index (2023):</p> <p>Score: 42/100</p> <p>Rank: 76/180 countries</p> <p>More than two-thirds of countries score below 50 on this year's CPI, with an average score of just 43. China's score of 42 places it around the average and positions it 76<sup>th</sup> out of 180 countries and territories. China performs better than neighboring countries, Afghanistan (20), India (39), Kazakhstan (39), Kyrgyzstan (26), Laos (28), Mongolia (33), Myanmar (20), Nepal (35), North Korea (17), Pakistan (29), Russia (26), Tajikistan (20), and Vietnam (41). China performs worse than neighboring country Bhutan (68). China scores similarly to the regional average of 45 for East Asia and the Pacific.</p> <p>Note: Based on 0 = Highly Corrupt, 100 = Very Clean.</p>	<p><a href="#">Transparency International Corruption Perception Index (CPI)</a></p>
	<p>Basel Anti-Money Laundering Index (2023):</p> <p>Rank: 27/152 countries</p> <p>Overall score: 6.77/10</p> <p>China scores high middle range of the risk scale for Basel AML Index and scores higher than most of its neighboring countries, including Malaysia (5.21), Tajikistan (5.91), Pakistan (5.44), Kyrgyzstan (6.00), Mongolia (5.00), Bhutan (5.89), but lower than Myanmar (8.13). Russia is not scored.</p> <p>Note: Ranking is out of 152 countries; top possible score is 0 (low risk), lowest score is 10 (high risk).</p>	<p><a href="#">Basel Anti-Money Laundering (AML) Index</a></p>
	<p>Global Rights Index (2024):</p> <p>Rating: 5 (No guarantee of rights)</p>	<p><a href="#">International Trade Union Conference</a></p>

Indicator	Description	Sources
	<p>With a rating of 5, China has “No guarantee of rights” for workers. China has a worse rating than the Asia-Pacific region, which is notably the second worst region in the world for workers’ rights, with a rating of 4.13. Rights to freedom of association and collective bargaining are restricted, and the right to strike is prohibited.</p> <p>Note: Countries are ranked from 1 to 5+, where five plus corresponds to “no guarantee of rights due to the breakdown of the law” and 1 corresponds to “sporadic violations of rights”.</p>	<p><a href="#">(ITUC) Global Rights Index (GRI)</a></p>
<p>Education and general literacy levels in a country</p>	<p>Adult literacy rates among the population aged 15 years and older (2020): 97.15%</p> <p>Adult female literacy rate (2020): 95.61%</p> <p>Adult male literacy rate (2020): 98.63%</p> <p>Comparison to neighboring countries:</p> <ul style="list-style-type: none"> <li>• Afghanistan (2021): 37.26%</li> <li>• Bhutan (2022): 72.10%</li> <li>• India (2022): 75.32%</li> <li>• Kazakhstan (2020): 99.80%</li> <li>• Kyrgyz Republic (2019): 99.60%</li> <li>• Lao PDR (202): 87.52%</li> <li>• Mongolia (2020): 99.18%</li> <li>• Myanmar (2020): 89.07%</li> <li>• Nepal (2021): 71.15%</li> <li>• North Korea: (2018): 99.99%</li> <li>• Pakistan (2019): 58.00%</li> <li>• Russian Federation (2021): 99.93%</li> <li>• Tajikistan (2014): 99.80</li> <li>• Vietnam (2019): 95.75%</li> </ul>	<p><a href="#">World Bank Open Data</a></p> <p><a href="#">World Bank Open Data</a></p> <p><a href="#">World Bank Open Data</a></p>

Indicator	Description	Sources
	<p>Primary school completion rates, total (% of relevant age group) (2010): 104.90%</p> <p>Primary completion rates, female (% of relevant age group) (2010): 105.38%</p> <p>Primary completion rates, male (% of relevant age group) (2010): 104.48%</p> <p>Comparison to neighboring countries:</p> <ul style="list-style-type: none"> <li>• Afghanistan (2019): 84.33%</li> <li>• Bhutan (2022): 78.63%</li> <li>• India (2020): Not Available</li> <li>• Kazakhstan (2022): 103.16%</li> <li>• Kyrgyz Republic (2022): 94.39%</li> <li>• Lao PDR (2022): 89.05%</li> <li>• Mongolia (2022): 95.79%</li> <li>• Myanmar (2018): 103.59%</li> <li>• Nepal (2022): 100.82%</li> <li>• North Korea: (2009): 99.28%</li> <li>• Pakistan (2021): 68.23%</li> <li>• Russian Federation (2019): 101.66%</li> <li>• Tajikistan (2017): 90.25%</li> <li>• Vietnam (2022): 115.85%</li> </ul> <p>Note: “There are many reasons why the primary completion rate can exceed 100 percent. The numerator may include late entrants and overage children who have repeated one or more grades of primary education as well as children who entered school early, while the denominator is the number of children at the entrance age for the last grade of primary education.”</p>	<p><a href="#">World Bank Open Data</a></p> <p><a href="#">World Bank Open Data</a></p> <p><a href="#">World Bank Open Data</a></p>
	<p>Lower secondary education completion rates, total (% of relevant age group) (2012): 104.90%</p> <p>Lower secondary completion rates, female (% of relevant age group) (2012): 104.90%</p> <p>Lower secondary completion rates, male (% of relevant age group) (2011): 102.84%</p> <p>Comparison to neighboring countries:</p>	<p><a href="#">World Bank Open Data</a></p> <p><a href="#">World Bank Open Data</a></p> <p><a href="#">World Bank Open Data</a></p>

Indicator	Description	Sources
	<ul style="list-style-type: none"> <li>• Afghanistan (2019): 59.72%</li> <li>• Bhutan (2022): 59.60%</li> <li>• India (2020): 87.24%</li> <li>• Kazakhstan (2022): 92.19%</li> <li>• Kyrgyz Republic (2022): 93.52%</li> <li>• Lao PDR (2022): 58.04%</li> <li>• Mongolia (2022): 95.86%</li> <li>• Myanmar (2018): 72.38%</li> <li>• Nepal (2022): 101.38%</li> <li>• North Korea: N/A</li> <li>• Pakistan (2021): 47.47%</li> <li>• Russian Federation (2019): 100.08%</li> <li>• Tajikistan (2017): 88.34%</li> <li>• Vietnam (2022): 100.27%</li> </ul> <p>Note: “There are many reasons why the rate can exceed 100 percent. The numerator may include late entrants and overage children who have repeated one or more grades of lower secondary education, as well as children who entered school early, while the denominator is the number of children at the entrance age for the last grade of lower secondary education.”</p>	
	<p>School enrolment, tertiary (2022): 71.98% gross  School enrolment, tertiary, female (2022): 78.09%  School enrolment, tertiary, male (2022): 66.74%</p> <p>Comparison to neighboring countries:</p> <ul style="list-style-type: none"> <li>• Afghanistan (2020): 10.86%</li> <li>• Bhutan (2022): 17.53%</li> <li>• India (2022): 31.57%</li> <li>• Kazakhstan (2020): 62.14%</li> <li>• Kyrgyz Republic (2022): 55.92%</li> <li>• Lao PDR (2021): 12.46%</li> <li>• Mongolia (2012): 64.32%</li> <li>• Myanmar (2018): 20.39%</li> <li>• Nepal (2022): 14.00%</li> <li>• North Korea: (2018): 27.21%</li> <li>• Pakistan (2021): 12.60%</li> </ul>	<p><a href="#">World Bank Open Data</a></p> <p><a href="#">World Bank Open Data</a></p> <p><a href="#">World Bank Open Data</a></p>

Indicator	Description	Sources
	<ul style="list-style-type: none"> <li>• Russian Federation (2019): 82.33%</li> <li>• Tajikistan (2017): 31.11%</li> <li>• Vietnam (2012): 42.22%</li> </ul> <p>Note: “There are many reasons why the rate can exceed 100 percent. The numerator may include late entrants and overage children who have repeated one or more grades of lower secondary education, as well as children who entered school early, while the denominator is the number of children at the entrance age for the last grade of lower secondary education.”</p>	
Attitudes towards migrant workers in a country’s population	<p>Migrant Acceptance Index score:</p> <p>China’s score of 5.11 out of 9 (2016) indicates that people in China exhibit a similar acceptance of migrants to other countries in the region and for all countries assessed, with the regional average for East Asia the world score both 5.29/9. China exhibits a higher acceptance of migrants than most neighboring countries.</p> <p>Comparison to neighboring countries:</p> <ul style="list-style-type: none"> <li>• Afghanistan: 2.51/9 (2016) 3.61 (2019)</li> <li>• Bhutan: N/A</li> <li>• India: 4.90/9 (2016) 4.01 (2019)</li> <li>• Kazakhstan: 4.28/9</li> <li>• Kyrgyz Republic: 4.59/9</li> <li>• Lao PDR: N/A</li> <li>• Mongolia: 2.99/9</li> <li>• Myanmar: 2.96/9 (2016) 4.00 (2019)</li> <li>• Nepal: 6.28/9</li> <li>• North Korea: N/A</li> <li>• Pakistan: 2.47/9 (2016) 4.21 (2019)</li> <li>• Russian Federation: 2.60/9</li> <li>• Tajikistan: 4.39/9 (2016) 5.10 (2019)</li> <li>• Vietnam: 6.08/9</li> </ul> <p>Note: Based on 138 countries surveyed in 2016; U.S. surveyed in 2017; and updated in 2019 (data not</p>	<p><a href="#">Gallup Migrant Acceptance Index, 2016</a></p> <p><a href="#">Gallup Migrant Acceptance Index, 2019</a></p>

Indicator	Description	Sources
	publicly available for all countries); top possible score is 9.0.	
Legislation and regulation to protect migrant workers	<p>Coverage of legal provisions under the labor laws</p> <p>China signed the International Covenant on Civil and Political Rights in 1998, which commits States to respect individuals regardless of their nationality and other status under Article 2.1. However, China has not yet ratified the treaty. <a href="#">U.N. Treaty Body Database</a> , <a href="#">International Covenant on Civil and Political Rights</a></p> <p>As of 2022, China has not signed or ratified the United Nations Convention on the Protection of the Rights of All Migrant Workers and Members of their Families. <a href="#">U.N. Treaty Body Database</a></p> <p>There is a lack of legal and institutional frameworks for foreign migration, which is attributed to political sensitivity to international mobility. Immigrants and returning migrants do not receive benefits other than an economic one, and they hardly ever gain permanence residence. Moreover, an ill-suited and incomplete immigration framework becomes an obstacle for migrants settling in China. A restrictive visa and insufficient robust labor rights also prevent workers continue working in China. <a href="#">MPI, 28 January 2022</a></p> <p>The Employment Promotion Law (2007) prohibits discrimination against internal migrant workers who move from rural to urban areas by establishing that they receive the same labor rights as urban workers. <a href="#">Employment Promotion Law (2007)</a></p> <p>The Labor Contract Law (2007) requires that all employers provide and sign labor contracts with all workers, including migrant ones. <a href="#">Labor Contract Law (2007)</a>.</p> <p>Domestic rural migrant workers are often subject to low-paid subcontracting work. There is a pervasive problem of these workers getting delayed payments or unpaid altogether. <a href="#">US Department of State, 2022</a></p>	<p><a href="#">U.N. Treaty Body Database</a></p> <p><a href="#">International Covenant on Civil and Political Rights</a></p> <p><a href="#">Migration Policy Institute (MPI), 28 January 2022, 'China's Rapid Development Has Transformed Its Migration Trends'</a></p> <p><a href="#">Employment Promotion Law (2007)</a></p> <p><a href="#">Labor Contract Law (2007)</a></p> <p><a href="#">'BBC, 2 September 2021, 'China steps in to regulate brutal '996' work culture'</a></p> <p><a href="#">Safeguard Report, 11 January 2022, 'China labor laws: An overview for global employers'</a></p> <p><a href="#">US Department of State, 2022, 2021 Country Reports on Human Rights Practices: China (Includes Hong Kong, Macau, and Tibet)</a></p>

Indicator	Description	Sources
	<p>Access to social protection, health, and education</p> <p>Access to social protection, health, and education is unequal for internal migrants in China, and while policy improvements have been made, barriers to access still exist.</p> <p>Historically, China treated its urban and rural workers unequally regarding social benefits. Urban workers often received secure jobs with comprehensive social benefits, while rural ones did not. Furthermore, in 1999, the Urban Minimum Living Standard program, or Dibao (低保), provided cash subsidies to urban Chinese in need. However, rural workers received little to no social benefits. These differences contributed to many rural workers migrating internally to urban areas. Over time, the Chinese government has created new regulations to provide social welfare to more people. The Dibao program was extended to rural workers in 2007, providing social assistance to poor rural households. <a href="#">Lixiong, Y., June 2018</a></p> <p>Many of China’s migrant workers are internal migrants who have moved from rural communities to urban ones for work. When workers move from one province to another, they often struggle to transfer their social security rights and benefits under the hukou system. This is due to several reasons. China lacks adequate levels of social security funds and administration to handle requests. Additionally, the social security information system across provinces is fragmented, preventing seamless communication for requests, and household registration restrictions prevent individuals from participating in social security in a new place of employment. <a href="#">Yinghua, Z., 2019</a></p> <p>The <i>Social Insurance Law (2010)</i> was introduced and ratified to merge previous and new social security regulations and apply them to all companies and organizations. This law covers all citizens and foreigners. It establishes a social insurance system to provide basic, medical, work injury, unemployment,</p>	<p><a href="#">Lixiong, Y., June 2018, The Social Assistance Reform in China:</a></p> <p><a href="#">Towards a Fair and Inclusive Social Safety Net, United Nations Department of Economic and Social Affairs</a></p> <p><a href="#">Yinghua, Z., 2019, Improving social protection for internal migrant workers in China, International Labour Organization and International Organization for Migration</a></p> <p><a href="#">Social Insurance Law of the Peoples’ Republic of China, 2010</a></p> <p><a href="#">ILO, November 2020, Institutional constraints for the extension of social insurance coverage to informal economy workers in China, Research Brief</a></p> <p><a href="#">Zheng, Y., Ji, Y., Chang, C., and Liverani, M., 2020, The evolution of health policy in China and internal migrants: Continuity,</a></p>

Indicator	Description	Sources
	<p>and maternity insurance to all its citizens, regardless of employment status. Both employers and employees will contribute to the primary medical, work-related, and maternity insurance. The State will contribute to the social insurance system. These insurances are applied to each citizen regardless of where they are in the country. <a href="#">Social Insurance Law of the Peoples' Republic of China, 2010</a></p> <p>Access to social protection still varies by location and form of employment. While China has improved coverage of social insurance schemes for rural and urban workers, as well as those in the informal economy, differences in rural-urban regulations still limit access to social insurance for some workers. <a href="#">ILO, November 2020</a></p> <p>Internal migrants also face barriers to accessing health services although access is improving. In 2009, the government issued a health policy promoting universal access to health services and a Basic Public Health Service has since been established. However, gaps still exist in access to affordable health care for internal migrants. Many internal migrants are employed on informal temporary contracts and lack workplace health benefits such as medical insurance. Additionally, local health departments are funded based on the number of hukou residents. Therefore, areas with large numbers of non-hukou (internal migrant) residents may not have sufficient resources to care for all local residents. <a href="#">Zheng et al., 2020</a></p> <p>Access to education has also been identified as an issue for internal migrants moving from rural to urban areas. Internal migrants' children experience discrimination and are disadvantaged by the household registration system. <a href="#">Zhang and Sargent, 18 September 2020</a></p> <p>Internal migrants' children are entitled to free schooling in urban areas. However, illegal fees are often charged, prompting parents to enroll their children in private migrant schools, which have</p>	<p><a href="#">change, and current implementation challenges. Asia and the Pacific Policy Studies, Vol. 7 (1), pp.81-94</a></p> <p><a href="#">Zhang and Sargent, 18 September 2020, 16 – The Education of Migrant Children in China's Cities. Chapter in Part III – Regional and Country Case Studies on Social Justice for Youth</a></p> <p><a href="#">Stanford University, No date, 'Educational Challenges – Education for Migrant Children'</a></p>

Indicator	Description	Sources
	poorer facilities and fewer resources. <a href="#">Stanford University, No date</a>	
	<p>Bilateral MOUs or other agreements specifically designed to protect migrant workers</p> <p>According to the ILO, China does not generally publish its agreements in the public domain, but there are some bilateral MOUs that protect Chinese migrant workers in nearby countries. <a href="#">ILO, 2015</a></p> <p><i>Employment Permit System (Republic of Korea)</i></p> <p>The Republic of Korea’s Employment Permit System bilateral MOU with China and 14 other countries: This agreement allows the Korean government to coordinate the recruitment, training, and supervision of migrant laborers from 15 countries in an effort to reduce harmful practices by corrupt private recruitment agencies. <a href="#">Andrees et al., 2015</a></p> <p><i>Industrial Training and Technical Internship Program (Japan)</i></p> <p>This Japanese program aims to recruit low-skilled workers and enter them into a training program to transfer Japanese knowledge and skills in industrial technology to developing countries. Foreign nationals enter a traineeship program and then become “technical interns” with the goal of returning to their home countries to use these new skills. Japan has signed this MOU with 15 countries. Most trainees come from China. Participants in the training program are supposed to receive legal residence status for up to three years and have equal protection to national workers.</p> <p>However, this program has faced criticism for accounts of forced labor, illegal recruitment fees, and inadequate enforcement. According to the 2024 Trafficking in Persons Report on China, companies that are a part of the program “have subjected PRC nationals to forced labor, often through debt bondage, in food processing, manufacturing,</p>	<p><a href="#">ILO’s Bilateral Agreements and Memoranda of Understanding on Migration of Low-Skilled Workers: A Review (2015)</a></p> <p><a href="#">Andrees, B., Nasri, A., Swiniarski, P., 2015, Regulating labour recruitment to prevent human trafficking and to foster fair migration: Models, challenges, and opportunities</a></p> <p><a href="#">US Department of State, 2024, 2024 Trafficking in Persons (TIP) Report: China</a></p>

Indicator	Description	Sources
	construction, and fishing.” <a href="#">US Department of State, 2024</a>	
Ratification of relevant international conventions and domestication of conventions into a national legal framework (Forced labor, human trafficking, and hazardous child labor)	Convention No. 29 – Ratified, In Force	<a href="#">Forced Labour Convention, 1930 (No. 29)</a>
	Convention No. 105 – Ratified, In Force	<a href="#">Abolition of Forced Labour Convention, 1957 (No. 105)</a>
	Convention No. 138 – Ratified, In Force	<a href="#">Minimum Age Convention, 1973 (No. 138)</a>
	Convention No. 182 – Ratified, In Force	<a href="#">Worst Forms of Child Labour Convention, 1999 (No. 182)</a>
	Protocol 29 – Not Ratified	<a href="#">Protocol of 2014 to the Forced Labour Convention, 1930 (P29)</a>
	Palermo Protocol – Ratified	<a href="#">Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational</a>

Indicator	Description	Sources
		<a href="#">Organized Crime (the ‘Palermo Protocol’)</a>
	Convention No. 188 – Not Ratified	<a href="#">ILO Convention 188 on Work in Fishing;</a>
	PSMA – Party to the PSMA, entered into force on 16 April 2025	<a href="#">The FAO Port State Measures Agreement (PSMA)</a> <a href="#">FAO, 16 April 2025, ‘China becomes Party to the PSMA’</a>
	<p>Domestication into national legislation</p> <p>Some forms of human trafficking are criminalized by the Criminal Code. Penalties include imprisonment and fines. Labor trafficking is prosecuted under Article 244, with penalties prescribed of three to 10 years’ imprisonment and a fine. <a href="#">US Department of State, 2024</a> , <a href="#">The Criminal Law of the People’s Republic of China</a></p> <p>China has a Compulsory Education Law (2006), which requires children from the ages of 6 or 7 years to receive and complete a nine-year compulsory education. <a href="#">China, Compulsory Education Law, 2006</a></p> <p>Article 2 of the Regulations Banning Child Labor (2002) prohibits the employment of children under the age of 16 years, referring to it as child labor. Employers found to be using child labor can be fined and required to repatriate children to their home under the care of their parents or guardians. <a href="#">China, Regulations Banning Child Labour, 2002</a></p> <p>Article 58 of the Labor Law (2018) states that children between the ages of 16 and 18 years are classed as juvenile workers. Article 64 prohibits juvenile workers from working in certain forms of hazardous work including in mining. <a href="#">US Department of State, 2022</a> , <a href="#">Labor Law of the People’s Republic of China</a></p>	<p><a href="#">US Department of State, 2024, 2024 Trafficking in Persons (TIP) Report: China</a></p> <p><a href="#">The Criminal Law of the People’s Republic of China</a></p> <p><a href="#">Compulsory Education Law of the People’s Republic of China, No. 52, 2006</a></p> <p><a href="#">China, Regulations Banning Child Labour, No. 364, 2002 [English translation]</a></p> <p><a href="#">US Department of State, 2022, 2021 Country Reports on Human Rights Practices: China (Includes Hong Kong, Macau, and Tibet)</a></p>

Indicator	Description	Sources
	<p>There is no national minimum wage. Instead, minimum wage rates are set at a provincial and local level according to standards set by the Ministry of Human Resources and Social Security. <a href="#">US Department of State, 2022</a> , <a href="#">The Regulation of Minimum Wage, Minimum wage standards in regions of the country (as of April 2022)</a></p>	<p><a href="#">Labor Law of the People’s Republic of China, No. 28, 2018</a></p> <p><a href="#">The Regulation of Minimum Wage</a></p> <p><a href="#">Minimum wage standards in regions of the country (as of April 2022)</a></p>
<p>Regulation of recruitment</p>	<p>Country’s government-sanctioned oversight mechanisms (regulations, accreditation schemes, inspection, etc.) of recruitment agents</p> <p><i>Employment Promotion Law of the People’s Republic of China (2007)</i></p> <p>The Employment Promotion Law states that recruitment agencies must provide accurate information about the jobs they are recruiting for. The law also establishes stipulations for recruitment agencies, including requirements for agencies to be licensed and have adequate staffing. Agencies may not keep laborer’s identification cards or charge a deposit to the laborers.</p> <p><a href="#">Employment Promotion Law of the People’s Republic of China (2007)</a></p> <p><i>Labour Contract Law (2007)</i></p> <p>The Labour Contract Law established that workers were granted employment following a contract agreement. The Law provides several workers’ rights. The worker can revoke the contract. The worker also can quit without notice if the employer uses violence, restriction of personal freedoms, or intimidation and if the employer fails to provide appropriate compensation on time. The contract may end if the worker finds that the employer was deceptive during the hiring process. The law also provided a foundation to provide penalties for forcing a person</p>	<p><a href="#">Employment Promotion Law of the People’s Republic of China (2007)</a></p> <p><a href="#">Labour Contract Law of the People’s Republic of China, No. 65, 2007</a></p> <p><a href="#">Global Slavery Index (GSI) (2018)</a></p> <p><a href="#">China Daily, 20 July 2023, 'HR agencies focus of new regulation'</a></p>

Indicator	Description	Sources
	<p>to work using “violence, intimidation, or illegal restriction of personal freedom.”</p> <p><a href="#">Labour Contract Law of the People’s Republic of China, No. 65, 2007</a></p> <p>According to the Global Slavery Index 2018, China does not have any laws to prevent recruitment fees. <a href="#">Global Slavery Index (GSI) (2018)</a></p> <p>In 2023, China introduced its inaugural regulation for the oversight of human resources agencies, aiming to enhance control over their activities and ensure a safer job market for the public. This regulation applies to human resources agencies and organizations operating on the mainland, encompassing those involved in job data collection and publication, providing human resources management consulting, employment or entrepreneurship guidance, as well as those offering labor dispatch services. Consequently, this legislation will encompass the operations of both job boards and staffing firms.</p> <p>Scheduled to come into effect on August 1<sup>st</sup> 2023, the regulation establishes clear legal responsibilities for human resources agencies and organizations. For instance, they are required to establish a job information management system to verify the authenticity and validity of job information provided by employers. They are also mandated to suspend or terminate services when they detect employers involved in unlawful employment practices. Furthermore, HR agencies are prohibited from securing employment for individuals under the age of 16 and are forbidden from arbitrarily transferring or falsifying their licenses or offering job services to employers lacking proper licenses. According to the regulation, human resources agencies must safeguard the privacy and personal information of job seekers to prevent unlawful activities such as information theft and trading. Moreover, these</p>	

Indicator	Description	Sources
	<p>agencies should not disrupt market order through monopolization, unfair competition, or actions that harm the interests of the state and individuals in human resources training. <a href="#">China Daily, 20 July 2023</a></p>	
<p>Enforcement of legislation for forced labor, human trafficking, hazardous child labor, migrant worker protections, recruitment and working conditions</p>	<p>Evidence from US government departments indicates that the enforcement of anti-trafficking and forced labor laws in China is ineffective.</p> <p>The US Department of State’s 2024 Trafficking in Persons (TIP) Report assigns China a ‘Tier 3’ Ranking, stating: “The Government of the People’s Republic of China (PRC) does not fully meet the minimum standards for the elimination of trafficking and is not making significant efforts to do so; therefore the PRC remained on Tier 3.” <a href="#">US Department of State, 2024</a></p> <p>The TIP Report indicates that China has made some efforts, even though not considered significant, to address human trafficking in recent years. For example:</p> <p>In 2022, China adopted the Women’s Rights and Interests Protection Law. In 2021 and 2022, the government reportedly allocated funding for training for law enforcement on prosecuting trafficking cases. Authorities also supported and participated in training organized by international organizations on trafficking prevention and victim protection in 2022 and 2023. Notably the government approved a new Action Plan to Combat Trafficking in Persons (2021-2030) in April 2021 and maintained it into 2023. However, there is almost no mention of forced labor in the new action plan. <a href="#">US Department of State, 2022</a> , <a href="#">US Department of State, 2023</a></p> <p>Most significantly, the government has itself been implicated in a pattern of widespread forced labor involving minority ethnic and religious groups in Xinjiang. The government has strongly denied these allegations. Despite instituting new testing protocols in Xinjiang in an attempt to dispel these allegations of forced labor, observers expressed doubts about</p>	<p><a href="#">US Department of State, 2024, 2024 Trafficking in Persons (TIP) Report: China</a></p> <p><a href="#">US Department of State, 2023, 2023 Trafficking in Persons (TIP) Report: China</a></p> <p><a href="#">US Department of State, 2022, 2022 Trafficking in Persons (TIP) Report: China</a></p> <p><a href="#">ILO, Discrimination (Employment and Occupation ) Convention, 1958 (No.111)–China (Ratification: 2006)</a></p>

Indicator	Description	Sources
	<p>the credibility of the protocols. <a href="#">US Department of State, 2022</a></p> <p>Overall, China’s law enforcement efforts have been maintained at an insufficient level in recent years. Although the Criminal Code criminalizes some forms of sex trafficking and labor trafficking, trafficking crimes are usually prosecuted under laws relating to other offences such as domestic violence, which carry lesser penalties, and cases with indicators of forced labor are mostly handled as administrative issues through the Ministry of Justice. <a href="#">US Department of State, 2024</a></p> <p>Law enforcement data is not collected or reported in a comprehensive way. The authorities have not classified conviction data under relevant criminal law statutes in recent years. Meanwhile, reports of officials facilitating or benefiting from sex trafficking and forced labor continue. In the absence of published data on official complicity, investigation and prosecution efforts are difficult to ascertain.</p> <p>The authorities engage with foreign governments to investigate cases of trafficking in China and abroad. Anti-Trafficking Agreements are in place with several countries in the lower Mekong to jointly address trafficking, and some local governments are working with counterparts in bordering countries. But foreign law enforcement report that their Chinese counterparts are sometimes unresponsive, and China’s complex law enforcement bureaucracy has hampered some joint operations. Efforts to assist and repatriate foreign trafficking victims of forced and fraudulent marriage are hindered by bureaucracy and corruption. <a href="#">US Department of State, 2024</a></p> <p>China’s narrow definitions of trafficking inhibit victim identification among men and boys over 14 years. Inadequate victim identification or referral procedures meant that some trafficking victims may have been arrested for crimes they were forced to</p>	

Indicator	Description	Sources
	<p>commit. No data is reported on the provision of victim services. Victims are not required to testify in court, but some foreign victims are required to stay in the country to assist police in their investigation. Victims are entitled to request criminal prosecution and to seek compensation through civil actions against traffickers, however, the equitable application of these benefits have been questioned by observers. <a href="#">US Department of State, 2024</a></p> <p>In a 2022 submission by the Chinese government to the Committee of Experts, the government outlines China's efforts in implementing laws and regulations regarding forced labor, hazardous child labor, and migrant worker protections. China states that it emphasizes equality in employment and claims compliance with the Convention's requirements through national laws like the Labour Law and Employment Promotion Law. Inspections and judicial actions are taken to ensure adherence, though concerns remain about discrimination, particularly in regions like Xinjiang. The submission also mentions policy frameworks to protect migrant workers and promote decent work, highlighting China's proactive approach to labor rights enforcement. <a href="#">ILO, No date</a></p>	
	<p>Child labor laws</p> <p>According to the US Department of State, the Chinese government enforced child labor laws when there were reports of child labor in the private sector. <a href="#">US Department of State, 2024</a></p> <p>There are still reports of children being forced to produce various goods – bricks, cotton, electronics, and toys – in China, sometimes because of arrangements between schools and factories. <a href="#">US Department of Labor, 2024</a></p>	<p><a href="#">US Department of State, 2024, 2023 Country Reports on Human Rights Practices: China (Includes Hong Kong, Macau, and Tibet)</a></p> <p><a href="#">US Department of Labor, 2024, 2024 List of Goods Produced by Child Labor or Forced Labor</a></p>

Indicator	Description	Sources
	<p>Global Slavery Index (2023):</p> <p>Est. no. of people living in modern slavery: 5,771,000</p> <p>Prevalence Index Rank: 4.0 per 1,000 people</p> <p>Vulnerability to Modern Slavery: 46/100</p> <p>Government Response Score: 40/100</p> <p>The 2023 GSI methodology states the Government Response Rating is “based on data collected on 141 indicators that are relevant to understanding how each government is tracking towards achieving 42 activities organized into five milestones. Each milestone represents an aspect of a strong government response to modern slavery; for example, supporting survivors to exit and remain out of modern slavery”.</p> <p>Note: The GSI ranks government response rating is presented as a percentage. A higher percentage reflects more action being taken and is assumed to mean lower risk by the SSRT.</p>	<p><a href="#">Global Slavery Index’s overall ratings</a></p> <p><a href="#">Global Slavery Index’s methodology</a></p>
	<p>Documentation from national labor inspection and other law enforcement agencies</p> <p>China does not collect or report comprehensive law enforcement data.</p>	<p><a href="#">US Department of State, 2024, 2024 Trafficking in Persons (TIP) Report: China</a></p>
	<p>Comments and observations from the ILO’s Committee of Experts on the Application of Conventions and Recommendations (CEACR)</p> <p>The Committee noted that the definition of discrimination does not cover all aspects of employment and occupation; therefore, the Committee asks the government to clarify the definition of discrimination and to identify to the extent which the Labour Law of 1994 covers. The Committee also noted that an internment programme has expanded since 2017; however, the government asserted that the programme benefits them in various ways. The Committee requested to revise policies of the activities for minorities to develop their abilities with their own aspirations and</p>	<p><a href="#">ILO Committee of Expert on the Application of Conventions and Recommendations</a></p> <p><a href="#">ILO Report of the Committee of Experts on the Application of Conventions and Recommendations (2022)</a></p>

Indicator	Description	Sources
	<p>repeal provisions, which prevent enterprises and trade unions from improving the treatment in employment.</p> <p><a href="#">Discrimination (Employment and Occupation) Convention, 1958 (No.111)</a></p> <p>In 2021, the ILO Committee of Experts noted the Chinese government argued that ILO’s comments on ethnic minority workers in Xinjiang is unreasonable. They also claimed that it contributes to the eradication of poverty. Therefore, the Committee urged the Government of the Chinese to provide detailed updated information on the measures taken or envisaged to ensure that its national employment policy effectively promotes both productive and freely chosen employment and to indicate the manner in which the representatives of these groups have been consulted. The Committee requested various information about minorities to promote employment and job creation for migrant workers, including internal rural migrants.</p> <p><a href="#">Employment Policy Convention, 1964 (No.122)</a></p> <p>The Committee noted that interns working in conditions that do not meet national minimum standards for labor protection is over 50%, and many continued working involuntarily and forcibly. The committee requested the government to take measures to prevent students engaging in involuntary and hazardous work under poor conditions. The Committee also noted the trial measures to strengthen supervision work in labor laws with a focus on child labor in 2021. The Committee urged the Government to take steps to gather and make available sufficient and accurate data on working children as well as detected violations and penalties imposed to improve its transparency.</p> <p><a href="#">Minimum Age Convention, 1973 (No. 138)</a></p> <p>The Committee noted the council issued China’s Plan of Action against Human Trafficking 2021-2030 and</p>	<p><a href="#">ILO Comments adopted by the CEACR: China</a></p> <p><a href="#">Discrimination (Employment and Occupation) Convention, 1958 (No.111)</a></p> <p><a href="#">Employment Policy Convention, 1964 (No.122)</a></p> <p><a href="#">Minimum Age Convention, 1973 (No. 138)</a></p> <p><a href="#">Worst Forms of Child Labour Convention, 1999 (No.182)</a></p> <p><a href="#">Maritime Labour Convention (MLC), 2006)</a></p>

Indicator	Description	Sources
	<p>the Child Development Outline of China for 2011-2020. The Committee requested the government to continue committing to investigations and prosecutions against the child-relevant crime. It also requested the Government continue to monitor the implementation and supervision of the laws to protect child domestic workers.</p> <p><a href="#">Worst Forms of Child Labour Convention, 1999 (No.182)</a></p> <p>The Committee expressed deep concern about the impact of the COVID-19 pandemic on the protection of seafarers’ rights. The Committee also noted that the Regulations of the People’s Republic of China on the Working and Living Conditions of Seafarers (hereinafter, Regulations on seafarers’ conditions) only apply to seafarers working on board Chinese-flagged ships engaged in international navigation, the Committee requested the Government to indicate how it implements various provisions of the Convention regarding seafarers working on ships engaged in national navigation.</p> <p>The Committee also noted that crew service agencies might not charge seafarers who don’t have proper documents for providing employment opportunities, so it requested the Government to provide details on the scope of “other fees”.</p> <p><a href="#">Maritime Labour Convention (MLC), 2006</a></p>	
Evidence of forced labor, human trafficking, and hazardous child labor in the country	<p>General evidence from other sectors</p> <p>The US Department of State’s 2024 Trafficking in Person (TIP) Report outlines allegations against China of state-sponsored forced labor involving the detention of more than one million people from ethnic minorities, including Uyghurs, ethnic Hui, ethnic Kazakhs, ethnic Kyrgyz, ethnic Tajiks, and ethnic Uzbeks in internment camps called Vocational Skills Education and Training Centers, which the report alleges are designed to erase ethnic and religious identities under the pretext of “deradicalization.”. According to the report,</p>	<p><a href="#">US Department of State, 2024, 2024 Trafficking in Persons (TIP) Report: China</a></p> <p><a href="#">US Department of Labor, 2024, 2024 List of Goods Produced by Child Labor or Forced Labor</a></p>

Indicator	Description	Sources
	<p>authorities in China have utilized discriminatory surveillance technologies, including facial recognition and DNA sequencing technology, as well as arbitrary administrative and criminal provisions to detain ethnic minorities in Xinjiang.</p> <p>In addition, the government has reportedly transported at least 80,000 individuals to other provinces for forced labor under the guise of poverty alleviation and industrial aid programs; and have convicted many, potentially thousands, more people, under spurious criminal charges and transferred them to urban prisons throughout the country, where they are subject to conditions of forced labor. The TIP Report also highlights the vulnerabilities of North Korean people to trafficking and forced labor. In addition to North Korean refugees and asylum seekers in China being especially vulnerable to trafficking, reports indicate that the North Korean government subjects its people to forced labor in China as part of a revenue generation effort. <a href="#">US Department of State, 2024</a></p> <p>Human trafficking, forced labor, and child labor have been linked to multiple sectors and goods in China.</p> <p>The Bureau of International Affairs (ILAB) identifies 31 goods made by child labor and/or forced labor or using inputs made by child labor and/or forced labor in China including Bricks, Christmas Decorations, Coal, Cotton, Electronics, Fireworks, Fish, Footwear, Garments, Gloves, Hair Products, Nails, Polysilicon, Textiles, Thread/Yarn, Tomato Products, and Toys, as well as battery and solar-related products that include inputs produced with child labor or forced labor. <a href="#">U.S Department of Labor, 2024</a></p> <p>The US Customs and Border Protection has issued Withhold Release Orders against 35 entities, all of which are at least partially active. Thirteen companies have been added to the list during the past five years and the associated products, including hair products, garments, apparel, cotton, tomatoes, tea, computer parts, downstream products, and</p>	<p><a href="#">U.S Customs and Border Protection: Withhold Release Orders and Finding List</a></p> <p><a href="#">International Labour Organization (ILO), 6 January 2023, 'Child labour in China and Mongolia'</a></p> <p><a href="#">Tang, C., Zhao, L., Zhao, Z., October 2018, Child labor in China, China Economic Review. Vol. 51, pp 149-166</a></p>

Indicator	Description	Sources
	<p>silica-based products. <a href="#">U.S Customs and Border Protection, 2022</a></p> <p>China has not published nor submitted official statistics on child labor. <a href="#">ILO, January 2023</a></p> <p>A 2018 study found that in 2010 about 7.74% of children aged 10 to 15 years were working, and they worked for 6.75 hours per day on average, spending 6.42 hours less per day on study than other children. About 90% of child laborers worked while still in school. <a href="#">Tang et al., 2018</a></p>	

Table 1: China - Country-level indicators

## China: Seafood industry-level indicators

Indicator	Description	Sources
Direct evidence of forced labor, human trafficking, and hazardous child labor	<p>No direct evidence was found of hazardous child labor in China’s seafood industry, but there is evidence of human trafficking and forced labor in the country’s fishing industry including the suspected use of North Korean labor, as well as evidence to suggest that state-sanctioned Uyghur forced labor and North Korean labor is used in China’s seafood processing industry. Evidence relating to these findings is outlined below.</p> <p>The US Department of Labor’s 2024 List of Goods Produced by Child Labor or Forced Labor highlights “Fish” from China as a good produced by Forced labor. According to the findings, adults work in forced labor in China’s distant water fishing (DWF) fleet. Most of the crew are migrant workers, particularly from Indonesia and the Philippines, who are highly susceptible to forced labor. Tens of thousands of workers are reportedly recruited by agencies that mislead them about wages and contract terms, charge recruitment fees, and impose debt contracts. Onboard, workers often have their identity documents confiscated, spend extended periods at sea without port stops, work up to 18-22 hours a day with little rest, and endure inadequate living</p>	<p><a href="#">US Department of Labor, 2024, 2024 List of Goods Produced by Child Labor or Forced Labor</a></p> <p><a href="#">US Department of the Treasury, 9 December 2022, ‘Treasury Targets Serious Human Rights Abuse Aboard Distant Water Fishing Vessels Based in the People’s Republic of China’</a></p> <p><a href="#">Environmental Justice Foundation (EJF), 20 December 2022, ‘USA Sanctions Chinese Vessels Engaged in</a></p>

Indicator	Description	Sources
	<p>conditions, malnutrition, physical abuse, restricted freedom, and unpaid wages. <a href="#">US Department of Labor, 2024</a></p> <p>In December 2022, the US Department of the Treasury placed sanctions on several companies that own Chinese DWF vessels in response to allegations of forced labor and illegal, unreported, and unregulated (IUU) fishing. Over 150 vessels were affected by the sanctions. From interviews, a wide range of alleged human rights abuses were found. Conditions reported by crew members included physical violence, nonpayment, denial of leave, malnutrition and the withholding of food, and health and safety issues, resulting in deaths of multiple workers. <a href="#">US Department of Treasury, 9 December 2022</a> , <a href="#">EJF, 20 December 2022</a> , <a href="#">Seafood Source, 9 December 2022</a></p> <p>Official records reveal that the deaths of two Indonesian crew members in the Chinese fishing fleet were not reported following the uproar over the deaths of four other individuals and accusations of forced labor and illicit fishing. Saleh Anakota, aged 22, passed away on August 10, three months after the deaths of four fellow Indonesians aboard the Long Xing 629, leading to global condemnation. Rudi Ardianto, aged 30, died on August 8 on another vessel, the Tian Xiang 16, within the same fleet. The cause of both deaths, attributed to an unspecified "sickness," is documented in Indonesian Foreign Ministry records reviewed by Mongabay. Additionally, it has been uncovered that another Indonesian crew member lost their life on the Long Xing 629, a Chinese vessel implicated in using forced labor for illegal fishing practices, including shark finning. <a href="#">Basten Gokkon, Philip Jacobson, 2020</a></p> <p>Crews aboard Chinese ships off the coast of Somalia were forced to work in harsh conditions without pay. Indonesian crew who worked on Chinese ships reported experiencing physical abuse, nonpayment of</p>	<p><a href="#">Human Rights Abuses and Illegal Fishing'</a></p> <p><a href="#">Seafood Source, 9 December 2022, 'Pingtan Marine, Dalian Ocean hit with US sanctions'</a></p> <p><a href="#">Basten Gokkon, Philip Jacobson, 2020, Breaking: Deaths of 2 more Indonesian crew uncovered on board Chinese tuna fleet</a></p> <p><a href="#">EJF, 26 October 2021, 'Fisherman Dies Trying to Escape Abuse Aboard Chinese Vessels Fishing Illegally in Somalia'</a></p> <p><a href="#">Business &amp; Human Rights Resource Centre, 8 September 2021, 'China &amp; Japan: NGO uncovers human rights violations and illegal fishing on Chinese ships linked to Japanese supply chains'</a></p> <p><a href="#">Daniels, A., Kohonen, M., Eroni, E., and Thiam, M.,</a></p>

Indicator	Description	Sources
	<p>wages, and other coercive methods of control. Even after the workers’ contracts ended, they were forced to stay on board and work, and one of the crew members drowned while attempting to flee the adverse conditions. In August 2021, EJF was able to help repatriate the crew. The implicated vessels were also found to be fishing illegally in violation of local and Chinese fisheries regulations, with catches of endangered species and shark finning occurring. <a href="#">EJF, 26 October 2021</a></p> <p>Human rights violations and illegal fishing on Chinese vessels that import seafood to Japan were identified by EJF. Interviews with 15 crew working on seven Chinese tuna longline vessels linked to Japanese supply chains revealed excessive wage deductions and nonpayment of wages, physical and verbal abuse, excessive working hours, inadequate access to food and potable water, and industrial-scale illegal shark finning. <a href="#">Business &amp; Human Rights Resource Centre, 8 September 2021</a></p> <p>The November 2023 report “Dark Webs”, published by the Financial Transparency Coalition, found that 26% of industrial and semi-industrial fishing vessels accused of forced labor for which flag data were available were flagged to China. In addition, more than one-third of companies owning vessels accused of using forced labor were Chinese (77 out of 277 companies). Of the main companies found to own vessels accused of using forced labor, 7 out of 10 are from China and some are partly owned by the Chinese government. The seven Chinese companies named by the report are: Zhejiang Hairong Ocean Fisheries Co Ltd, Pingtan Marine Enterprise Ltd., Ocean Star Fujian Pelagic Fishery Co. Ltd., Liaoning Daping Fishery Group Co. Ltd., CNFC–China National Overseas Fisheries Corporation Ltd. (CNFC), Dalian Ocean Fishing Co. Ltd., and Qingdao Haoyang Ocean Fishery Co. Ltd.</p> <p>Evidence connecting fishing vessels owned by these companies to allegations of forced labor has been</p>	<p><a href="#">November 2023, Dark Webs: Uncovering those behind forced labour on commercial fishing fleets</a></p> <p><a href="#">EJF, 07 March 2024, Zhejiang Ocean Family Co. Ltd and its Fishy Business</a></p> <p><a href="#">The Outlaw Ocean Project, October 2023, Crimes at sea: The superpower of seafood – Findings</a></p> <p><a href="#">Urbina, I., 9 October 2023, ‘A Fleet Prone to Captive Labor and Plunder’, The Outlaw Ocean Project</a></p> <p><a href="#">Urbina, I., 9 October 2023, ‘The Uyghurs Forced to Process the World’s Fish’, The Outlaw Ocean Project</a></p> <p><a href="#">Urbina, I., 25 February 2024, ‘Inside North Korea’s Forced-Labor Program’, The New Yorker</a></p> <p><a href="#">Scarlatoiu, G., Committee for Human Rights in North Korea</a></p>

Indicator	Description	Sources
	<p>reported by Greenpeace and some vessels have been sanctioned by the US Government. Conditions of forced labor reported include deception, withholding of wages, abusive living and working conditions, and debt bondage. For example, 18 Indonesian fishermen said they went unpaid for a 20-month period from 2018 to 2020 onboard the vessel Fu Yuan Yu 7883 owned by Pingtan. Additionally, the Fu Yuan Yu 7881, another vessel owned by Pingtan, was reported to have left 24 Filipino fishermen stranded in China for three months without pay and limited access to rusty water. And on another Pingtan vessel, the Fu Yuan Yu 7886, crew were reportedly subjected to physical violence, intimidation, threats, and the withholding of wages. Pingtan is also implicated in forced labor cases involving vessels subcontracted from another company, Fuzhou Honglong Ocean Fishing Co. Ltd. Chinese vessels accused of forced labor have also been implicated in the correlated risk of illegal fishing, specifically, the Tai Hong 1 was intercepted in 2018 carrying shark fins and the captain was accused of denying food and water to 12 Tanzanian fishermen onboard, forcing them to share a confined living space without ventilation. <a href="#">Daniels et al., November 2023</a></p> <p>A March 2024 report published by Environmental Justice Foundation (EJF) links the operations of major Chinese seafood company, Zhejiang Ocean Family Co., Ltd. (ZOF), to human rights abuses and environmental concerns in fishing. The company, which is a significant tuna producer in China, and its subsidiaries have owned or chartered 12 fishing vessels that have been connected to allegations of human trafficking, forced labor, and/or illegal, unreported, and unregulated (IUU) fishing. EJF conducted interviews with 20 crewmembers in Indonesia who worked between January 2018 and September 2022 on 12 XIN SHI JI vessels owned or associated with ZOF. Among the human rights violations identified during interviews, 80% of the 20</p>	<p><a href="#">(HRNK), 24 October 2023, “From Bait to Plate-How Forced Labor in China Taints America’s Seafood Supply Chain”, A Hearing of the Congressional-Executive Commission on China (CECC)</a></p> <p><a href="#">US Department of State, 2024, 2024 Trafficking in Persons (TIP) Report: China</a></p> <p><a href="#">EJF, February 2025, Trapped at sea: exposing North Korean forced labour on China’s Indian Ocean tuna fleet</a></p>

Indicator	Description	Sources
	<p>crewmembers reported having identity documents confiscated, 40% reported having to pay a security deposit of around US\$1,000 guaranteeing they would fulfil their contract, 80% reported excessive overtime working 18 hours to up to 2 days without adequate rest, 35% reported physical abuse, 40% reported verbal abuse, and 50% reported abusive working and living conditions. Workers also experience deception associated with their contracts. Out of the 12 vessels investigated, four stayed at sea for more than 22 months. <a href="#">EJF, 07 March 2024</a></p> <p>In October 2023, The Outlaw Ocean Project published the findings of an investigation into the conditions of China’s DWF fleet and seafood processing industry. These findings corroborate the evidence reported above regarding human trafficking and forced labor in the country’s fishing industry and identify alleged forced labor in seafood processing. Evidence relating to the DWF fleet specifically relates to squid fishing and is therefore discussed further in the fishing indicators.</p> <p>The Outlaw Ocean Project investigation identifies the alleged employment of Uyghurs and other ethnic minorities in forced labor in seafood processing. According to the findings of the investigation, more than 1,000 people have been forcibly transferred by the Chinese government from Xinjiang Province to work for 10 seafood processing companies in Shandong Province since 2018. Five of those seafood processing companies have exported seafood to the United States, despite the United States having prohibited the import of products made by workers from Xinjiang Province under the Uyghur Forced Labor Prevention Act.</p> <p>All 10 of the seafood processing companies connected by the investigation to Uyghur forced labor have been certified by the Marine Stewardship Council (MSC), and four have been certified by the Aquaculture Stewardship Council (ASC), raising concerns raised about the reliability of social audits in</p>	

Indicator	Description	Sources
	<p>the country and industry. <a href="#">The Outlaw Ocean Project, 2023</a></p> <p>The Outlaw Ocean Project investigation used the internet to help identify the apparent employment of Uyghurs at seafood processing plants. Among the evidence reported, videos uploaded to Douyin (Chinese social media) by Uyghurs between February 2021 and April 2023 appear to show Uyghurs at two seafood processing plants in China that export products to major brands throughout the United States, Canada, and Europe. <a href="#">Urbina, 9 October 2023</a></p> <p>The findings also describe the use of North Korean labor in seafood plants in China’s border province Liaoning. North Korean overseas labor in general has been connected to forced labor by the North Korean government. The investigation claims that since 2017, at least 15 seafood Chinese seafood processing plants have employed North Korean labor. Five of the 15 plants investigated were connected to seafood exports to Europe and at least ten of these plants have exported seafood, including clams, pollock, and squid, among other seafood, to importers in the United States, despite a ban by the United States on the import of goods produced with North Korean labor. Five of the 15 plants connected by the investigation with the use of North Korean labor were certified by the MSC. Reports indicate that few social auditors feel safe to enquire about the presence of North Korean or state-sponsored labor during inspections, giving a false sense of the workforce to buyers. In interviews with North Korean workers who had recently left Chinese factories and were mostly women, the workers described experiencing physical and sexual abuse and debt bondage by managers, excessive working hours and receiving only one day off per month. North Korean workers are also subject to isolation and surveillance. <a href="#">The Outlaw Ocean Project, 2023</a></p> <p>North Korean workers reportedly experience wage withholding, typically not receiving their wages until</p>	

Indicator	Description	Sources
	<p>the end of the contract term, and are subject to wage deductions for payments to the state for food and housing etc. In addition, North Korean workers may be paid only a quarter of that of their local counterparts, and they are generally excluded from social security programs. One worker at a seafood factory claimed that managers don't allow the workers to get proper medical treatment when sick due to the costs. Seafood factory workers sleep in locked dormitories, shared with upwards of thirty people, and their movement outside the processing plants is controlled and restricted. While North Korean workers were observed being returned to North Korea in August and September 2023, some North Korean workers remained in China including one interviewed worker who worked for several years at a fish processing factory in Dalian city in Liaoning province. The North Korean government was allegedly planning to dispatch the next group of workers to China. <a href="#">Urbina, 25 February 2024</a></p> <p>According to an October 2023 submission to the Congressional-Executive Commission on China, thousands of North Korean workers have been employed in Chinese seafood processing facilities, often processing seafood imported from North Korea. North Korean seafood products imported into China for domestic consumption or processing and export include squid, croaker, and several species of crab. Seafood processed by North Korean workers includes squid, octopus, shellfish, crab, cod and pollock. The import of seafood processed by North Korean workers in China and/or seafood exported from North Korea to China into the United States violates US laws banning the import of goods made with North Korean labor such as the Countering America's Adversaries Through Sanctions Act (CAATSA).</p> <p>Furthermore, the employment of North Korean workers in Chinese seafood processing plants has been linked to allegations of forced labor and human</p>	

Indicator	Description	Sources
	<p>trafficking, with reports of deceptive recruitment practices, workers' identity documents being confiscated, isolation, long working hours, unsafe working conditions, debt incurred in North Korea to secure overseas work, lower wages than Chinese workers, unpaid overtime, and wage deductions by the North Korean government. In August 2023, all or most North Korean workers were repatriated back to North Korea, with witnesses speculating that North Korean workers will not be used in seafood processing facilities in China again, with China instead building processing plants in North Korea. <a href="#">Scarlatoiu, Committee for Human Rights in North Korea (HRNK), 24 October 2023</a></p> <p>Following the release of The Outlaw Ocean Project's 2023 investigation into China's seafood processing industry, the 2024 Trafficking in Persons Report states that Uyghur workers, other Muslim ethnic minority workers, and North Korean workers are subject to conditions of forced labor in seafood processing. <a href="#">US Department of State, 2024</a></p> <p>In addition to the above allegations about North Korean workers being employed in China's seafood processing industry, an investigation by EJF revealed that North Korean laborers assigned by their government are suspected to have been working aboard Chinese-flagged tuna longliners in the Indian Ocean. The 2025 briefing by EJF reveals the findings of an investigation that included interviews with Indonesian and Filipino crew who had worked on Chinese tuna longliners in the Indian Ocean between March 2019 and June 2024 as well as photo and video evidence. These workers reportedly spend up to a decade at sea under extremely harsh conditions, with most of their earnings remitted directly to Pyongyang. In many cases, they rarely set foot on land because captains transfer them to sister vessels before arriving in port, ostensibly to avoid detection by port authorities. When vessels do dock, other crew members may use mobile phones to contact family,</p>	

Indicator	Description	Sources
	<p>but North Korean workers are denied such means of communication.</p> <p>According to interviews with 19 Indonesian and Filipino shipmates, North Korean crew members—despite having their passports confiscated—are often among the most skilled laborers on board, having accumulated extensive experience at sea. However, they endure demanding work schedules with limited rest, sometimes sleeping only five to six hours per day. Their employment contravenes United Nations sanctions prohibiting member states from hiring North Korean workers, given concerns that the resulting remittances could support the country’s nuclear weapons program. The study identified at least 12 Chinese-flagged tuna longliners using North Korean labor between 2019 and 2022, including four vessels authorized to export fish to Europe and the United Kingdom. It should be noted that there were limitations to the investigation including that EIJF were unable to speak to any North Korean workers suspected of having worked on the vessels to fully corroborate the testimonies collected. <a href="#">EIJF, February 2025</a></p>	
<p>ILO indicators of forced labor and ILO R190 definition of hazardous child labor</p>	<p>Evidence was also found relating to indicators of forced labor in China’s fishing fleet.</p> <p>The 2024 Trafficking in Persons Report states that men from Africa, Asia, and other regions experience conditions indicative of forced labor aboard Chinese-flagged and Chinese-owned, foreign-flagged DWF vessels. Indicators of forced labor include verbal and physical abuse, excessive working hours, poor living conditions, and isolation at sea for extended periods, among others. Crew on DWF vessels are often vulnerable to debt bondage, having been recruited by unlicensed or poorly regulated recruitment brokers in China and overseas and subjected to recruitment fees and other expenses while waiting to be deployed, and required to pay a guarantee to the fishing operators. Some crewmembers are also forced to engage in</p>	<p><a href="#">US Department of State, 2024, 2024 Trafficking in Persons (TIP) Report: China</a></p> <p><a href="#">The Outlaw Ocean Project, October 2023, China: The superpower of seafood – Findings</a></p> <p><a href="#">US Customs and Border Protection, 28 May 2021, ‘CBP issues Withhold Release Order on Chinese fishing fleet</a></p>

Indicator	Description	Sources
	<p>criminal activity in IUU fishing and smuggling. <a href="#">US Department of State, 2024</a></p> <p>This is corroborated by other sources. For instance, the investigation reported by The Outlaw Ocean Project on October 2023 identified the risk of forced labor on 59 Chinese ships. The investigation found that human trafficking is a prevalent issue affecting workers on Chinese fishing vessels, especially those relying on foreign labor, notably from Indonesia. The recruitment process often involves hidden costs and upfront recruitment fees in contracts, leading to debt bondage for the workers. Since the onset of the pandemic, China has reduced its reliance on foreign labor and now targets deckhands through recruitment advertisements aimed at impoverished rural and inland workers in China, as well as individuals facing divorce, indebtedness, or desperate circumstances. Chinese news media and online forums caution against scams, wage theft, and harsh working conditions on these ships. Chinese court records and worker testimonies reveal that mutinies and strikes on these fishing vessels frequently escalate into violent situations. <a href="#">The Outlaw Ocean Project, 2023</a></p> <p>In May 2021, the US Customs and Border Protection (CBP) issued a Withhold Release Order and blocked imports from a Chinese fishing fleet, Dalian Ocean Fishing Co., Ltd., based on maltreatment of the crew. During the investigation, CBP discovered indicators of forced labor: physical violence, withholding of wages, and abusive working and living conditions. Most of the affected workers were Indonesians. The impacted products included tuna, swordfish, canned tuna, and ingredients for pet food. Before this, Withhold Release Orders had not been formally issued against an entire fleet of fishing vessels. <a href="#">US Customs and Border Protection, 28 May 2021</a> , <a href="#">The Washington Post, 28 May 2021</a></p> <p>While not a formal indicator of forced labor, IUU fishing is considered a correlated practice. Chinese</p>	<p><a href="#">US Customs and Border Protection'</a></p> <p><a href="#">The Washington Post, 28 May 2021, 'U.S. bans seafood imports from a Chinese company, accusing it of using forced labor'</a></p> <p><a href="#">Insight Crime, 3 August 2022, 'Plunder and Danger on Argentina's Sea Shelf'</a></p>

Indicator	Description	Sources
	<p>fishing vessels engage in a range of IUU fishing practices. For example, China’s DWF fleet is reported to engage in IUU fishing off Argentina’s Atlantic Coast. A 2021 report by Oceana used satellite data to show that 433 Chinese-flagged vessels fished for 679,067 hours along Argentina’s EEZ border between January 2018 and April 2021, but the vessels often disappeared from tracking systems (referred to as ‘going dark’) by turning off their AIS. In addition, vessels were reported to be manipulating GPS positions and identification numbers. <a href="#">Insight Crime, 3 August 2022</a></p>	
<p>Fishing, aquaculture, and processing regulations and policies</p>	<p>Labor-related fishing legislation</p> <p>The ILO’s NATLEX Database lists three pieces of legislation on fishers in China:</p> <ul style="list-style-type: none"> <li>• The Fisheries Act, 1929</li> <li>• The Fishermen Association Act, 1929</li> <li>• Fisheries Law of the People’s Republic of China (PRC Presidential Order No. 34 of 1986).</li> </ul> <p><a href="#">ILO NATLEX Database</a></p> <p>In addition to environmental management, the Fisheries Act of 1929 is intended to improve fishers’ livelihoods. <a href="#">The Fisheries Act, 1929 (PDF of Act in English as amended to 21/08/2013)</a></p> <p>Among other duties listed by the Fishermen Association Act of 1929, fishermen associations are intended to safeguard fishermen’s rights and interests. <a href="#">The Fishermen Association Act, 1929 (PDF of Act in English as amended to 28/11/2012)</a></p> <p>However, these two Acts are enforceable only in Taiwan and are not applicable under the same jurisdiction as the Fisheries Law of the People’s Republic of China.</p> <p>Article 1 of the <i>Fisheries Law of the People’s Republic of China of 1986</i> states among its purposes “ensuring fishery workers’ lawful rights and interests”. This law</p>	<p><a href="#">ILO NATLEX Database</a></p> <p><a href="#">The Fisheries Act, 1929 (PDF of Act in English as amended to 21/08/2013)</a></p> <p><a href="#">The Fishermen Association Act, 1929 (PDF of Act in English as amended to 28/11/2012)</a></p> <p><a href="#">Fisheries Law of the People’s Republic of China (PRC Presidential Order No. 34 of 1986) (PDF of Law in English as amended to August 28, 2004)</a></p> <p><a href="#">Global Slavery Index (GSI) 2018-- Fishing</a></p> <p><a href="#">Yanan Yu, Marcin Lorenc, and Yude</a></p>

Indicator	Description	Sources
	<p>is meant to establish fishers’ working rights as well as regulate the economic activity in fisheries. It has chapters (Chapters II and III) on fishing and aquaculture. <a href="#">Fisheries Law of the People’s Republic of China (PRC Presidential Order No. 34 of 1986) (PDF of Law in English as amended to August 28, 2004)</a></p> <p>The 2018 Global Slavery Index (GSI) for fishing:</p> <ul style="list-style-type: none"> <li>• National Fisheries Policy (catch outside EEZ, distant water fishing, and subsidies) <ul style="list-style-type: none"> <li>○ High Risk</li> </ul> </li> <li>• Wealth and Institutional Capacity (GDP per capita, value landed per fisher, and unreported landings) <ul style="list-style-type: none"> <li>○ Medium Risk</li> </ul> </li> </ul> <p>In 2021, the <i>Maritime Traffic Safety Law of the People’s Republic of China</i> was revised, and the protection of crew rights was added for the first time.</p> <ul style="list-style-type: none"> <li>• Chapter 1: General Provisions <p>Article 6: The state ensures the working environment of seafarers, the Industrial Commission, and protects the rights and interests of seafarers by the law.</p> </li> <li>• Chapter 2: Modern, Offshore Duty-Free and Seafarers <p>Article 14: The owner, operator, or manager of a Chinese ship shall apply for a maritime labor certificate for a ship on international voyages to the maritime administration. In order to obtain a marine labor certificate, a vessel must meet the following conditions:</p> <p>(2) The shipowner, operator, or manager has ensured that the crew’s working environment, occupational health and safety protection, work and rest time, wages, living conditions,</p> </li> </ul>	<p><a href="#">Shao (2022). Legal Challenges in Protecting the Rights of Cruise Ship Crew at the Post COVID-19 Pandemic Era, MDPI</a></p> <p><a href="#">The Maritime Traffic Safety Law of China (2021)</a></p> <p><a href="#">People’s Republic of China Crew Rules (2020)</a></p> <p><a href="#">China Dialogue Ocean, 2022, China’s five-year plan for fishing focuses on aquaculture</a></p> <p><a href="#">Ministry of Agriculture and Rural Affairs of the People’s Republic of China (2020)</a></p> <p><a href="#">The State Council—The People’s Republic of China, 2023, 中国的远洋渔业发展</a></p> <p><a href="#">The State Council Information Office – The People’s Republic of China, 24 October 2023,</a></p>

Indicator	Description	Sources
	<p>medical conditions, and social insurance comply with relevant national regulations.</p> <ul style="list-style-type: none"> <li>Chapter 9: Liability</li> </ul> <p>Article 97 : If there is a seafarer who works or holds a ship without a seafarer’s license or health certificate, or if the qualification or health certificate does not meet the requirements, the maritime administrative agency imposes a fine on the owner. 10,000--100,000 RMB on the ship's operator or manager; 3,000-- 30,000 RMB on the crew; 30,000-- 300,000 RMB or even more fine on the owner, operator, or manager of the vessel if the circumstances are severe.</p> <p><a href="#">The Maritime Traffic Safety Law of China (2021)</a></p> <p>The People’s Republic of China Crew Rules stipulates the following rights:</p> <ol style="list-style-type: none"> <li>1. The right to get a reward</li> <li>2. The right to claim sickness subsidies</li> <li>3. The repatriation of profit</li> <li>4. The right to leisure</li> <li>5. The right to earn insurance</li> </ol> <p><a href="#">People’s Republic of China Crew Rules (2020)</a></p> <p>China published its Five Year Plan (FYP) for fishery development in January 2022. The 14th FYP for the fishing industry features 12 targets, with two being obligatory and the remaining 10 aspirational. The mandatory objectives involve curbing ocean fishing output and reducing the number of vessels. Additionally, the plan signals China’s commitment to assisting fishermen in transitioning to new careers and providing subsidies to discourage the capture of trash fish, which suggests a further decline in wild catches. Ensuring the plan for the fishing industry encompasses the creation of room for</p>	<p><a href="#">Full text: Development of China's Distant-Water Fisheries</a></p>

Indicator	Description	Sources
	<p>environmentally sustainable aquaculture expansion is a crucial component. Several strategies were highlighted as potential avenues for such growth, including offshore aquaculture and integrating aquaculture with rice cultivation. Concurrently, China is moving towards standardizing the design of aquaculture ponds and promoting eco-friendly practices, such as water recycling and the fusion of aquaculture with rice farming.</p> <p>Notably, the plan introduces limits on veterinary drug residues in seafood, marking the first time China has incorporated such measures into a Five-Year Plan for fisheries. This step will bolster safety and quality oversight. A previous 2021 action plan had already outlined five methods for improving aquaculture, which encompass promoting eco-friendly techniques, effluent treatment, reducing drug usage, replacing “trash fish” (small fish often used as animal feed) with compound feed, and enhancing genetic stock. Trials involving compound feed as a substitute for trash fish have yielded a substantial 77% replacement rate, potentially encouraging nearby aquaculture operations to adopt this approach. <a href="#">China Dialogue Ocean, 2022</a></p> <p>The People’s Republic of China Offshore Fisheries Management Regulations specifies the following rights:</p> <p>Chapter 5 Production Safety</p> <p>Article 28: Distant water fishing (DWF) enterprises are obligated to engage in direct contractual agreements with the fishing crews or the entities employing them, acquire appropriate insurance coverage for the fishing crews, ensure timely payment of wages, and safeguard the legitimate rights and interests of the fishing crews. Moreover, these companies are prohibited from imposing unreasonable fees on the fishing crews.</p>	

Indicator	Description	Sources
	<p>Distant ocean fishery enterprises shall not employ persons who do not possess valid fishery crew certificates for roles as distant ocean fishery crew members.</p> <p>The number of offshore fishery crew members employed shall not exceed the number of crew members approved by the Ministry of Agriculture and Rural Affairs in the offshore fishery project approval document.</p> <p><a href="#">Ministry of Agriculture and Rural Affairs of the People’s Republic of China, 2020</a></p> <p>China is engaging in multilateral fisheries governance under the UN framework to promote a more equitable global system. It is considering joining the Port State Measures Agreement (PSMA) to combat illegal fishing and is researching conventions like the Cape Town Agreement of 2012 on vessel safety. Additionally, China aims to include its high seas fishing vessels in the in the FAO Global Record of Fishing Vessels, Refrigerated Transport Vessels and Supply Vessels, improve cooperation with the International Maritime Organization (IMO), and mandate DWF vessels to register for IMO identification numbers.</p> <p><a href="#">The State Council–The People’s Republic of China, 2023 , The State Council Information Office – The People’s Republic of China, 24 October 2023</a></p> <p><i>Safeguarding the lawful rights and interests of the crew</i></p> <p>As a founding member of the International Labor Organization, China attaches great importance to the protection of workers' rights and interests. By April 2023, it had ratified 28 international labor conventions including seven core conventions such as the Forced Labor Convention, 1930 and the Abolition of Forced Labor Convention, 1957.</p>	

Indicator	Description	Sources
	<p>China prioritizes the protection of the rights and interests of distant-water fishing crew members. Consistent efforts have been made to regulate crew employment and management, enabling DWF companies to assume their full responsibilities, strengthening industry self-discipline and employment supervision, and ensuring satisfactory working conditions and proper remuneration for Chinese and international crew in accordance with the law. Companies are required to respect the following requirements:</p> <ul style="list-style-type: none"> <li>• Pay the crew on time. Arrears of wages without justifiable cause are forbidden.</li> <li>• Arrange reasonable working hours and provide sound living and working conditions for the crew.</li> <li>• Properly handle the legitimate demands of the crew. Companies are required to understand, respect, and maintain an inclusive attitude towards their customs and religious beliefs and cultural differences. Discrimination, abuse or ill-treatment of the crew is strictly prohibited.</li> <li>• Strengthen skills and workplace safety training and raise awareness of safety issues.</li> <li>• Equip vessels with the necessary labor protection equipment and facilities to ensure a safe environment and working conditions.</li> <li>• Equip vessels with essential medicines and rapidly provide all necessary medical treatment and psychological aid to crew members in need. Any illness or injury beyond the handling capacity of the vessel</li> </ul>	

Indicator	Description	Sources
	<p>must be reported promptly to enable treatment.</p> <p><a href="#">The State Council—The People’s Republic of China, 2023</a>, <a href="#">The State Council Information Office – The People’s Republic of China, 24 October 2023</a></p>	
<p>Enforcement and implementation of industry-specific regulations and policies</p>	<p>The 2024 Trafficking in Persons Report recommends that China should increase its oversight of labor conditions in the country’s fishing industry by prohibiting illegal and unregistered recruitment agencies, requiring international vessel registration, enhancing data collection and transparency for fishing vessels and crew lists, conducting unscheduled inspections onboard vessels, and collaborating with port authorities in other countries to investigate and prosecute forced labor on DWF vessels. No measures have been reported to screen or identify indicators of forced labor among migrant crew on China’s coastal offshore and DWF vessels. Chinese fishermen who were victims of forced labor reportedly could not report abuses to local authorities or access protection services when they returned to China. China did not report publicly on whether programs started in previous years to reduce the vulnerability of informally or illegally employed foreign seafarers continued to be implemented. <a href="#">US Department of State, 2024</a></p> <p>Enforcement of fisheries regulations and policies in China is unproductive. Although there are many departmental regulations in China, these regulations tend to regulate the management of crew from an administrative perspective, and the legislative level is low, the content of rights and interests is not explicit, systematic, and incomplete. Unproductive law enforcement increases the possibility of corruption.</p> <p>The legal effect of these regulations is low and cannot fully ensure the rights of the crew. Moreover, the existing labor laws in China do not consider the particularities of offshore work. They are devised for</p>	<p><a href="#">US Department of State, 2024, 2024 Trafficking in Persons (TIP) Report: China</a></p> <p><a href="#">Yu, Y., Lorenc, M., and Shao, Y., 2022. Legal Challenges in Protecting the Rights of Cruise Ship Crew at the Post COVID-19 Pandemic Era, Sustainability, Vol. 14 (6)</a></p> <p><a href="#">Seafood Source, 19 April 2021, ‘Milestone reached as China assigns first on-board observers to distant-water fishing vessel’</a></p> <p><a href="#">Huihui Shen and Shuolin Huang, January 2021. China’s policies and practice on combatting IUU in distant water fisheries,</a></p>

Indicator	Description	Sources
	<p>land-based jobs, leading to a poor working environment for international cruise ships. The low efficiency in protecting crew members' rights is attributed to overlapping functions and a lack of communication mechanisms between the government department, such as market regulation, social security, and human resources. <a href="#">Yu et al. 2022</a></p> <p>In 2021, China sent five government-appointed observers to work on high seas fishing vessels to collate data as part of an effort to ensure that Chinese vessels comply with Regional Fisheries Management Organizations. The observers, appointed by China's Agriculture Ministry, traveled to the Pacific and Indian oceans to monitor the legality of catches. It is the first time that China dispatched observers to monitor transshipments by high seas vessels and showed China's willingness to participate in international ocean governance. The dispatch of Chinese observers aims to prevent illegal fishing activities. Three Agriculture Ministry entities, including the Ocean Fisheries International Compliance Research Center, China Ocean Fisheries Data center, and the Ocean Fisheries Training Center, analyze the data collected during the inspection. <a href="#">Seafood Source, 19 April 2021</a></p> <p>The law for distant water fisheries still doesn't exist, despite having Fisheries Law about illegal fishing. To combat IUU fishing, China's government is conducting several practices. First, all DWF vessels are required to install a satellite-based vessel monitoring system, which should always be in continuous operation at sea. Second, a blacklist of DWF practitioners was issued by the Ministry of Agriculture for the first time in 2017, which sanctioned project managers and skippers involved in noncompliant activities in the DWF industry. Third, the government reduced subsidies by structural reforms in fisheries. Between 2016 and 2021, 78 DWF companies and 264 illegal fishing vessels had their fuel subsidies deducted or suspended. Fourth, the</p>	<p><a href="#">Aquaculture and Fisheries, Vol. 6 (1), Pages 27-34</a></p> <p><a href="#">Congressional Research Service, 2022, China's Role in the Exploitation of Global Fisheries: Issues for Congress</a></p>

Indicator	Description	Sources
	<p>government has improved data collection and reporting. Fifth, an increase in observer coverage with requirements from regional fisheries management organizations ranging from 5 to 10% and even as high as 50% in target fisheries. Lastly, the China Distant Water Fisheries Association and Shanghai Ocean University provide regular training courses for skippers and crew members to develop their awareness of international and domestic fishery laws and regulations. <a href="#">Huihui Shen and Shuolin Huang, January 2021</a></p> <p>The Ministry of Agriculture and Rural Affairs (MARA) and the National People’s Congress, the country’s main legislative body, are making efforts to update administrative measures and laws to discourage IUU fishing and establish stricter management norms in the distant-water fishing sector. In August 2019, MARA released the “Measures for the Supervision and Location Monitoring of Distant Ocean Fishing Vessels” requiring all fishing vessels approved by the Ministry to use location monitoring equipment for offshore fisheries production. These Measures mandate vessels to report their positions multiple times a day to MARA and provincial fishing authorities. The China Fisheries Association is entrusted with equipment maintenance, technical training, and standards setting for implementing the new position monitoring system. To enforce compliance, vessels that falsify location data or remove monitoring equipment improperly will forfeit all policy subsidies for that year.</p> <p>In February 2020, MARA issued additional “Regulations on the Management of Distant Ocean Fisheries”, which includes the provision that vessels engaged in IUU fishing or failing to accurately report their positions could be placed on a blacklist. This blacklist would prohibit violators from applying for fishing licenses for five years. Additionally, in August 2019, MARA published a draft revision of China’s 1986 Fisheries Law, aiming to clarify penalties for IUU</p>	

Indicator	Description	Sources
	<p>fishing, introduce new enforcement mechanisms, and define law enforcement powers and standards for investigating and penalizing IUU violations. The proposed enforcement measures include vessel confiscation, revocation of company fishing licenses, and recording severe violations in China’s Corporate Social Credit databases, which could expose violators to various additional administrative penalties.</p> <p><a href="#">Congressional Research Service, 2022</a></p>	
<p>Access to workplaces for third-party monitors (trade union representatives, on-board observers, etc.)</p>	<p>There is limited information about access to seafood workplaces for third-party monitors. Evidence suggests that even more commonplace activities like the use of fisheries observers for environmental monitoring are limited. In 2021, China dispatched five fisheries observers to high seas vessels operating in the Pacific and Indian oceans to observe transshipment activities for the first time. <a href="#">Seafood Source, 19 April 2021</a></p> <p>China’s squid jigging fishery systematically collects two main types of data: catch information and biological observations. All vessels operate under a standardized logbook system created by the China Distant Water Fisheries Association, which records vessel specifications (such as engine power and lighting capacity) as well as detailed fishing activity, including coordinates, timestamps, and catch volumes. Vessels must also submit weekly reports with estimated catches, fleet size, and operational status. Since 2015, the National Data Centre for Distant-water Fisheries (NDCDF) has overseen data management and introduced an electronic logbook system to improve accuracy and real-time monitoring. In 2024, the fishery submitted verified fishing activity data to the Secretariat. Meanwhile, scientific observers and research vessels collected biological information—such as tissue samples, mantle length, sex ratios, maturity stages, and reproductive traits—and monitored bycatch events involving protected species, as well as any at-sea transshipment activities. <a href="#">SPRFMO, September 2025</a></p>	<p><a href="#">Seafood Source, 19 April 2021, ‘Milestone reached as China assigns first on-board observers to distant-water fishing vessel’</a></p> <p><a href="#">South Pacific Regional Fisheries Management Organisation (SPRFMO), September 2025, Annual Report of China to the Scientific Committee—Squid</a></p>

Indicator	Description	Sources
<p>Worker access to a functional grievance mechanism</p>	<p>The 2023 Trafficking in Persons Report states that Chinese fishers subjected to forced labor were unable to report abuses to local authorities or access protection services when returning to the country. However, the report does not specify the reasons for this. <a href="#">US Department of State, 2024</a></p> <p>The main way to report crew complaints is by phone, and some complaints are received through the director’s mailbox, fax, or letter. Complaints are mainly obtained from the Crew Management Office of the Maritime Safety Administration of the Ministry of Transport, the Crew Management Office of the direct maritime organizations, the Crew Management Office of the shipping branch, and other related channels. Crew complaints have been addressed under the crew management office of the maritime unit. The department resolves major complaints through mediation, and illegal acts are subject to administrative disposition according to the Seafarers Rules.</p> <p>However, the current mechanism is insufficient due to various civil complaints and protection issues of seafarers. Sailors generally have a vague understanding of their rights. In addition, there are problems such as the method of protecting the rights and interests of the infringed is unclear and the effect of protecting the rights and interests is insufficient. The current complaint-handling mechanism faces many problems.</p> <ul style="list-style-type: none"> <li>Protecting seafarers’ rights and interests involves many departments, including maritime, human resources and social security, policing, arbitration, and courts. The cross-management of these related departments is managed with unclear responsibilities, preventing crew members from getting help in a timely manner when they need it. The China Maritime Safety Administration has not</li> </ul>	<p><a href="#">US Department of State, 2024, 2024 Trafficking in Persons (TIP) Report: China</a></p> <p><a href="#">Cao, Y. C., and Tang, S.Y., 2017. Research of Chinese seafarers complaints mechanism, Chinese Journal of Maritime Law</a></p> <p><a href="#">The Outlaw Ocean Project, October 2023, Crimes at sea: The superpower of seafood – Findings</a></p>

Indicator	Description	Sources
	<p>established a department in charge of protecting the rights and interests of seafarers in order to receive seafarers' grievances uniformly as the department in charge of seafarers. In the meantime, insufficient publicity and education activities made seafarers unaware of grievance channels. As a result, the rights and interests of seafarers are infringed, and there is no grievance channel, which becomes an obstacle to the protection of rights and interests.</p> <ul style="list-style-type: none"> <li>• Different departments' geographic locations, jurisdictions, and business responsibilities create barriers to coordinating the department's complaint handling.</li> <li>• In general, the handling of complaints by flight attendants is often handled by staff in the flight attendant management department or other related tasks who do not have a comprehensive understanding of relevant laws to protect the rights and interests of flight attendants. Lack of experience in handling complaints leads to a decrease in work efficiency.</li> <li>• Long waits for grievance feedback seriously impact the crew's willingness to file a complaint and reduce the credibility of competent authorities. The imperfection of these mechanisms results in a lack of oversight over the effectiveness of complaint-handling agencies. In addition, the department is unable to summarize complaint information, identify complaint hotspots and adjust how they are handled in a timely manner.</li> </ul> <p><a href="#">Cao and Tang, 2017</a></p>	

Indicator	Description	Sources
	<p>According to The Outlaw Ocean Project, the Chinese government has taken steps to control labor unrest on board Chinese squid fishing ships by installing satellite video links between squid ships and police departments in Chinese port cities. Though it is unclear from the reporting to what extent this mechanism is intended to control workers versus provide a grievance mechanism for them. <a href="#">The Outlaw Ocean Project, 2023</a></p>	
<p>Access to join a trade union</p>	<p>Unknown.</p> <p>No information was found on access to trade unions for seafood workers. However, there are significant concerns for workers’ rights to freedom of association in general in China.</p> <p>Ethnic and religious minorities are persecuted and subject to mass detentions by the Chinese authorities. These communities are denied a collective voice. There are reports of workers being dismissed for trying to organize and arrested for “gathering a crowd to disturb social order”. Many labor activists have been imprisoned or subject to harassment and surveillance, and the whereabouts of some workers involved in protests is unknown. <a href="#">ITUC, 2022</a></p> <p>According to the US Department of State, the All-China Federation of Trade Unions (ACFTU) is the only trade union recognized by law. Strikes are not supported by law. All China’s Federation of Trade Unions (ACFTU) has not been involved in most disputes and collective actions in the major manufacturing zones where most private business is located and where most of the workers are internal migrant workers. Although the Trade Union Law states that trade union officers at each level should be elected, most officials are appointed. Independent unions are illegal and are viewed as a political threat. Workers do not have the right to strike, but there</p>	<p><a href="#">International Trade Union Conference (ITUC), 2022, Global Rights Index (GRI) 2022</a></p> <p><a href="#">US Department of State, 2022, 2021 Country Reports on Human Rights Practices: China (Includes Hong Kong, Macau, and Tibet)</a></p> <p><a href="#">China Briefing, 2022, China Trade Unions – Considerations for Employers Under New Amended Law</a></p> <p><a href="#">ITUC, No date, Survey of Violations of Trade Union Rights</a></p>

Indicator	Description	Sources
	<p>have been strikes that have led to increased wages or better working conditions in some industries.</p> <p>The ACFTU does not have to represent the interests of the workers in disputes, and all union activity must be approved by the ACFTU. While the official union leaders are meant to be elected, most are selected and approved by regional ACFTU officers and CCP authorities. <a href="#">US Department of State, 2022</a></p> <p>Recent revisions to the Trade Union Law introduce a new clause affirming that trade unions should adapt to changes in company organizational structures, workforce composition, labor relations, and employment formats. This provision aims to safeguard the rights of workers, such as gig workers, to join and organize trade unions in accordance with the law.</p> <p>Although the All-China Federation of Trade Unions (ACFTU) exists, and employees have the legal right to unionize in China, the influence of labor unions is comparatively restricted compared to some other nations. A notable distinction lies in the independence of trade unions in many other countries, where they are not answerable to the government or the company.</p> <p>In China, trade unions also serve a crucial ideological role and function to consolidate support for the Communist Party of China (CPC). This role is explicitly stated in the Trade Union Law, which mandates that trade unions must adhere to the socialist path, the people's democratic dictatorship, and the leadership of the CPC. <a href="#">China Briefing, 2022</a></p> <p>There are multiple reports of workers and labor activists being arrested and detained in relation to trade union activity in recent years. And workers have been dismissed by employers for trying to organize. In addition, human rights lawyers and families of</p>	

Indicator	Description	Sources
	workers involved in organizing and protesting have experienced harassment. <a href="#">ITUC, No date</a>	
Participation in voluntary schemes and implementation of comprehensive corporate policies and strategies to combat forced labor, human trafficking, and hazardous child labor	<p>Voluntary certification schemes for aquaculture have expanded their presence in China over the past decade with the support of local organizations and firms.</p> <p>In 2014, the Global Aquaculture Alliance (GAA) signed a memorandum of understanding (MoU) with the China Aquatic Products Processing and Marketing Alliance (CAPPMA), a national non-profit organization under the Ministry of Agriculture of China, to jointly promote responsible aquaculture in China and worldwide. The two organizations agreed to work collaboratively to advance responsible aquaculture through the exchange of information and research. The agreement between GAA and CAPPMA was formalized during the inaugural China International Aquatic Products Exposition and the sixth International Shrimp Industry Development Forum held in Zhanjiang, China, on June 18. Peter Redmond, VP of market development for GAA's Best Aquaculture Practices (BAP) division, emphasized the significance of the agreement, acknowledging CAPPMA's role in the domestic and export markets. Under the MoU, CAPPMA agreed to assist in identifying and enrolling processors, farms, feed mills, and hatcheries in the BAP certification program to increase the number of BAP-certified facilities in China. In addition, CAPPMA will seek GAA's guidance and expertise in establishing good aquaculture practice standards in China, encompassing areas such as food safety, environmental responsibility, social responsibility, and animal welfare. <a href="#">GSA, June 2014</a></p> <p>In its most recently available Global Impact Report, the Global Seafood Alliance (GSA) reports that GSA's China office held a seminar on March 7 in Nanjing to educate producers and retailers about the BAP farm</p>	<p><a href="#">Global Seafood Alliance (GSA), June 2014, 'GAA Signs MoU with China Aquatic Products Processing and Marketing Alliance'</a></p> <p><a href="#">Global Seafood Alliance (GSA), August 2023, Global Impact Report</a></p> <p><a href="#">Global Seafood Alliance (GSA), No date, BAP Certified Aquaculture Producers</a></p> <p><a href="#">Aquaculture Stewardship Council (ASC), 14 September 2016, ASC announces partnership for development in China</a></p> <p><a href="#">Aquaculture Stewardship Council (ASC), No date, Find a farm</a></p> <p><a href="#">AquaFeed, 27 March 2024, 'ASC to cease operations in China'</a></p> <p><a href="#">Sustainable Fisheries Partnership (SFP), No date, AIP</a></p>

Indicator	Description	Sources
	<p>standard. More than 40 representatives from farms and retailers attended. <a href="#">GSA, August 2023</a></p> <p>As of August 2023, there were 230 BAP-certified facilities in China, of which there are 139 farms producing a variety of species, including 9 shrimp producing farms. <a href="#">GSA, No date</a></p> <p>In 2016, the Aquaculture Stewardship Council (ASC) established a collaboration with Qingdao Tao Ran Environmental Science and Technology (Tao Ran), an environmental firm based in China, to expedite the expansion of the ASC program in China. Tao Ran was commissioned to lead the implementation of strategies and promote the adoption of ASC farm standards. Qing Fang, the aquaculture program leader at Tao Ran, highlighted the benefits of integrating the ASC’s certification and labeling program in China, saying the collaboration could enhance the health of China’s aquatic ecosystems by incentivizing better environmental practices and improved conditions for workers and surrounding communities. <a href="#">ASC, 14 September 2016</a></p> <p>As of August 2023, there were 37 ASC-certified facilities in China, including three certified farms producing whiteleg shrimp. <a href="#">ASC, No date</a></p> <p>However, the ASC announced in March 2024 that it would be phasing out its program in China to focus on investing in other regions, markets and activities where it can have the biggest impact. <a href="#">AquaFeed, 27 March 2024</a></p> <p>One of only a small number of Aquaculture Improvement Project (AIP)s currently operating globally is located in Hainan province, China. The Hainan Tilapia AIP launched in 2014. Participants include farmers and a farmer association, sustainability organizations, Hainan University, and several companies.</p> <p>The AIP program commenced with a total of 10 pilot farms located within Hainan. The primary objective</p>	<p><a href="#">Directory-- Hainan Tilapia</a></p> <p><a href="#">Sustainable Fisheries Partnership (SFP), No date, ‘Success Story Zonal Aquaculture Management in Hainan, China’</a></p> <p><a href="#">MSC, 2021, China’s sustainable seafood movement builds as sixth fishery is MSC certified</a></p> <p><a href="#">MSC, 2015, China’s first longline fishery achieves MSC Certification</a></p> <p><a href="#">Sustainable Fisheries Partnership (SPF), 2024, SUPPLY CHAIN ROUNDTABLE Global Squid</a></p>

Indicator	Description	Sources
	<p>was to address issues pertaining to sustainability, environmental impact mitigation, and disease control through the implementation of zonal management strategies.</p> <p>Since then, several of the farms have become BAP-certified and pilot farms are operating the Hainan Tilapia Sustainability Alliance (HTSA)'s Code of Good Practice. More than 500 farmers have undergone comprehensive technical and institutional training provided by the Association. <a href="#">SFP, No Date</a>, <a href="#">SFP No Date</a></p> <p>Similar programs and voluntary certification schemes are in place for fisheries.</p> <p>Situated in the China Yellow Sea, the Yalu Estuary Manila clam fishery successfully transitioned from a multi-stakeholder Fishery Improvement Project (FIP) to achieving full certification within three years in 2021. The establishment of the FIP was driven by demand from Japanese seafood retailers for sustainable clams, influencing the fishery's entry into the MSC program. Funding for the FIP was provided by WWF Japan, Industry Partner Nichirei Japan, and Global Fishery Funds. While approximately 10,000 tons of the anticipated 200,000 tons of MSC certified clams are destined for export to Japan, the remainder will contribute to expanding the market for MSC-labeled products in China and fostering new market opportunities in Europe. <a href="#">MSC, 2021</a></p> <p>In 2015, Liancheng Overseas Fishery (Shenzhen) Co. Ltd (SZLC) became China's first longline fishery to attain MSC Certification. The fishery targets tuna. <a href="#">MSC, 2015</a></p> <p>There is also an example of an industry initiative relevant to China's fisheries: the Global Squid Supply Chain Roundtable (GS SR), which comprises a group of European and North American importers and buyers of squid from Asian-Pacific and South American fisheries, working in collaboration to</p>	

Indicator	Description	Sources
	support sustainable improvements to squid fisheries. In 2023, the GS SR adopted a new strategy to address the risks of IUU fishing and human rights abuses in squid fisheries and global supply chains. The SR participants will focus on four key working areas in 2024: governance and participation, transparency and traceability, science-based management, and human rights due diligence. <a href="#">SFP, 2024</a>	

Table 2: China-- Seafood industry-level indicators

## China: Fishing indicators

Indicator	Description	Sources
Direct evidence of forced labor, human trafficking, and hazardous child labor	<p>There is direct evidence of forced labor in China’s squid fishing industry.</p> <p>In October 2023, The Ocean Outlaw Project published the findings of an investigation into the conditions of China’s distant water fishing fleet. The investigation identified forced labor on 29 squid fishing vessels and the risk of forced labor on 59 other ships. Documented abuses included wage theft, physical violence, retention of identity documents, deprivation of food and drinking water and restricted access to medical care. At least 24 workers were identified to be suffering from beriberi, a disease caused by malnutrition likely caused by excessive time at sea with limited access to fresh fruit and vegetables or vitamin supplements, of which at least 15 workers died. <a href="#">The Outlaw Ocean Project, 2023</a></p> <p>Aboard one Chinese squid jigger operating near the Falkland Islands, on which the Outlaw Ocean Project investigators were able to talk with crew, a Chinese deckhand is quoted as saying that many of the crew were being held on the vessel against their will. He reportedly said, “It’s impossible to be happy...We don’t want to be here, but we are forced to stay.” He estimated that around eighty percent of the other crew members would leave if given the choice and</p>	<p><a href="#">The Outlaw Ocean Project, October 2023, Crimes at sea: The superpower of seafood – Findings</a></p> <p><a href="#">Urbina, I., 9 October 2023, ‘A Fleet Prone to Captive Labor and Plunder’, The Outlaw Ocean Project</a></p> <p><a href="#">Urbina, I., Mckenzie, P., and Schvartzman, M., August 2024, Taking Over From the Inside: China’s Growing Reach Into Local Waters</a></p> <p><a href="#">artisOnal, 2023, Beyond Fishing: Dire Labor Conditions in the Southeast</a></p>

Indicator	Description	Sources
	<p>likened the experience to being isolated from the world and far removed from modern life. A second deckhand claimed to have had their passports confiscated. <a href="#">Urbina, 9 October 2023</a></p> <p>A later article published by The Outlaw Ocean Project in August 2024 describes several instances of abuses toward workers onboard Chinese squid fishing vessels.</p> <p>In January 2019, during a four-year investigation, reporters from The Outlaw Ocean Project boarded a Chilean fishing vessel in Punta Arenas, where the crew described witnessing a Chinese captain on a nearby squid ship physically assaulting deckhands.</p> <p>Over the past decade, an average of one dead body has been dropped off every two months at the port of Montevideo, Uruguay, mostly from Chinese squid ships. Many of these deaths have been attributed to beriberi, a preventable form of malnutrition caused by a B1 vitamin deficiency, often resulting from a diet of white rice or instant noodles. Experts consider this a warning sign of criminal neglect.</p> <p>In the spring of 2021, an Argentinian crew member, Manuel Quiquinte, contracted Covid while working aboard the squid jigger Xin Shi Ji 89. The vessel, owned by a Chinese company but flagged to Argentina, was operating in Argentinian waters with a mixed crew of Argentinian and Chinese workers. After Quiquinte fell ill, the Argentine captain contacted the ship's Chinese owners to request permission to dock in Argentina for medical treatment, but the company denied the request and instructed the crew to continue fishing. Quiquinte passed away on the ship shortly after, in May.</p> <p>In February 2022, reporters boarded a Chinese squid vessel near the Falkland Islands, where an 18-year-old Chinese worker begged for rescue, saying crew passports were confiscated. Later, the team visited</p>	<p><a href="#">Pacific Ocean Squid Fishery</a></p> <p><a href="#">Sea Shepherd, 2021, Sea Shepherd Tracks Down and Exposes Notorious Chinese Squid Fishing Fleet off the Galapagos Islands</a></p> <p><a href="#">US Department of Labor, 2024, 2024 List of Goods Produced by Child Labor or Forced Labor</a></p>

Indicator	Description	Sources
	<p>another ship near the Galapagos Islands, finding a crew exhausted from working 15-hour days, 6 days per week in poor conditions. In June 2023, Uruguayan authorities sought help after a message in a bottle claiming to be from a crew member of a Chinese squid ship claimed the worker had been locked up. Also, in 2021, a crew member on another Chinese squid jigger died after contracting COVID-19 when the vessel he was on was denied the opportunity to go to shore to seek medical care by company officials. <a href="#">Urbina, Mckenzie, and Schwartzman, August 2024</a></p> <p>One of the distant-water squid vessels suspected of forced labor was the Chinese-flagged CHANG TAI 802, from which an Indonesian crew shouted from the stern, "I WANT TO GO HOME." But the vessel continued fishing for squid for another year until it arrived at port in mid-August 2022. <a href="#">artisOnal, 2023</a></p> <p>In 2021, an investigation was carried out by journalists onboard a Sea Shepherd vessel observing Chinese squid fishing vessels in the high seas south-west of the Galapagos. Among the 29 documented squid jiggers, 24 were found to have a background involving either: allegations of forced labor; previous convictions for illegal fishing; a pattern of using multiple electronic identities to evade monitoring organizations; or engaging in "dark" operations by disabling their mandatory location transponders. In an interview with an Indonesian fisher on board the squid jigger, Chang Tai 802, the fisher said, "I'm stuck here" and "I want to go home". <a href="#">Sea Shepherd, 2021</a></p> <p>Following the reported allegations from The Outlaw Ocean Project, the US Department of Labor notably began listing squid as a good produced by forced labor in China's distant water fishing fleet in its 2024 List of Goods Produced by Child Labor or Forced Labor. <a href="#">US Department of Labor, 2024</a></p>	

Indicator	Description	Sources
<p>ILO indicators of forced labor and ILO R190 definition of hazardous child labor</p>	<p>Employment on Chinese fishing vessels poses significant risks.</p> <p>Findings from research carried out by EJF in 2025, which included interviews with crew on Chinese squid jiggers in the Southwest Atlantic, reveal that human rights and labor abuses violations and forced labor appear to be common across the high-seas squid-jigging fleet, with such abuses reported especially frequently on vessels flying the Chinese flag.</p> <p>The findings indicate a high risk of forced labor. Physical violence, one of the strongest indicators of forced labor, was found to be widespread on squid-jigging vessels operating in the Southwest Atlantic. Among the 56 interviewed workers who had served on Chinese-flagged jiggers, half said they had either experienced or witnessed physical force being used to intimidate or punish crew. Such abuse was reported on 56.5% of Chinese vessels, compared with 30.8% of Taiwanese and 16.0% of South Korean vessels included in the interviews. Officers were said to hit, punch, kick, or slap workers for reasons ranging from struggling to learn tasks, arriving late, being ill, or making mistakes when sorting the catch. Reports indicated that abuse was especially common on vessels owned by Qingdao Haoyang Fisheries, a subsidiary of the Shandong Bodelong Group. These exploitative conditions often occur alongside illegal fishing and wildlife harm, exacerbated by the general lack of transparency and oversight in the high-seas squid fleet. A crew member from a Chinese-flagged vessel reported being frequently kicked and struck on the head. A different worker described how a drunk deputy foreman assaulted him for not having the proper jacket required for work in the cargo hold. <a href="#">EJF, 17 September 2025</a></p> <p>Specific fishing vessels have also been linked to indicators of forced labor. The vessels Ning Tai 52, 57, and 6 have all shown signs of forced labor, and the latter two reportedly left injured and deceased crew</p>	<p><a href="#">EJF, 17 September 2025, BRIGHT LIGHTS, DIM PROSPECTS, EJF, September, 2025</a></p> <p><a href="#">C4ADS, June 2025, KEEPING THE LIGHTS ON— Uncovering the Networks Enabling the Distant Water Squid Fleet</a></p> <p><a href="#">The Outlaw Ocean Project, 2023, Findings</a></p> <p><a href="#">artisOnal, 2023, Beyond Fishing: Dire Labor Conditions in the Southeast Pacific Ocean Squid Fishery</a></p> <p><a href="#">EJF, 07 March 2024, Zhejiang Ocean Family Co. Ltd and its Fishy Business</a></p>

Indicator	Description	Sources
	<p>members in Callao, Peru. In 2020, a crew member from the Ning Tai 52 filed an official complaint with Greenpeace, reporting eight International Labour Organization indicators of forced labor, including restricted movement, physical and sexual abuse, excessive working hours, and the nonpayment of wages. <a href="#">C4ADS, June 2025</a></p> <p>The Outlaw Ocean Project investigation found that between 2013 and 2022, the remains of 43 deceased crew members were removed from 37 Chinese squid jiggers. In addition to 29 identified cases of forced labor, the risk of forced labor existed on an additional 59 ships. Abuses recorded included wage theft, acts of violence, the seizure of passports, and the withholding of food and water.</p> <p>Chinese fishing ships heavily depend on foreign workers, primarily from Indonesia, who are often recruited through employment agencies. These agencies incorporate concealed expenses and initial recruitment fees into the contracts, leading to situations of debt bondage. It also found that the Chinese fleet uses transshipment more than any other fleet, which is considered an associated risk to forced labor. <a href="#">The Outlaw Ocean Project, 2023</a></p> <p>Prior to the issuance of the new port regulations by the Peruvian government, foreign squid vessels typically operated at sea for an average of 10 to 12 months, involving at least one entry into Peruvian ports each year. Following the implementation of new port regulations by Peru, the standard duration of fishing trips was extended to 18 to 24 months. In some instances, there were even cases where vessels spent over two years at sea without the crew setting foot on the mainland. This prolonged time at sea posed almost inhumane conditions, particularly concerning given the fishing fleet's history of forced labor. They also suggest that a dramatic increase in forced arrivals may reflect the dire conditions of the crew. The traces left by this vessel and the entire</p>	

Indicator	Description	Sources
	<p>squid fleet on publicly accessible databases reveal the stark truth about crew members who might be involuntarily serving in the industrial squid fishing sector. <a href="#">artisOnal, 2023</a></p> <p>As described in the seafood industry-level indicators, a March 2024 report published by Environmental Justice Foundation (EJF) links some operations of major Chinese seafood company, Zhejiang Ocean Family Co., Ltd. (ZOF), to human rights abuses and environmental concerns. The company and its subsidiaries have owned or chartered 12 fishing vessels that have been connected to allegations of human trafficking, forced labor, and/or illegal, unreported, and unregulated (IUU) fishing. While the report focuses on tuna, noting ZOF is a significant tuna producer in China, the company also owns 13 squid jiggers flagged to Argentina. This raises concerns about similar issues potentially occurring on squid fishing vessels associated with the company. <a href="#">EJF, 07 March 2024</a></p>	
Fishing Characteristics	<p>Thirty or more days at sea</p> <p>Squid vessels fishing in the Southeast Pacific typically spend approximately 10 to 12 months at sea, making at least one port entry per year. After Peru enacted new port regulations in 2020, the usual duration of fishing expeditions increased to 18 to 24 months. There were instances where vessels remained at sea for over two years without the crew disembarking on the mainland. <a href="#">artisOnal, 2023</a></p>	<a href="#">artisOnal, 2023, Beyond Fishing: Dire Labor Conditions in the Southeast Pacific Ocean Squid Fishery</a>
	<p>Targeting overexploited stocks</p> <p>There are concerns regarding the sustainability of squid fisheries. A 2021 assessment by Sustainable Fisheries Partnership estimates that only 19.5% of global squid production is sustainable or improving. <a href="#">SFP, 2021</a></p>	<a href="#">Sustainable Fisheries Partnership (SFP), 2021, 2021 Sector Sustainability Update: Squid</a>

Indicator	Description	Sources
	<p>FishSource scores for squid caught by Chinese flagged vessels indicate poor or unrated (sometimes due to data deficiency) squid stock health:</p> <ul style="list-style-type: none"> <li>• Japanese flying squid – East China Sea, Yellow Sea, Sea of Japan and NW Pacific Ocean <ul style="list-style-type: none"> <li>○ Current Health - <math>\geq 6</math></li> <li>○ Future Health - <math>&lt; 6</math></li> </ul> </li> <li>• Neon flying squid – Western winter spring <ul style="list-style-type: none"> <li>○ Current Health - <math>\geq 6</math></li> <li>○ Future Health - Not Yet Scored</li> </ul> </li> <li>• Jumbo flying squid – SE Pacific <ul style="list-style-type: none"> <li>○ Current Health - Data deficient</li> <li>○ Future Health - Data deficient</li> </ul> </li> <li>• Argentine shortfin squid – SW Atlantic <ul style="list-style-type: none"> <li>○ Current Health - Data deficient</li> <li>○ Future Health - Data deficient</li> </ul> </li> <li>• Indian squid – Chinese waters <ul style="list-style-type: none"> <li>○ Current Health - Not Yet Scored</li> <li>○ Future Health - Not Yet Scored</li> </ul> </li> <li>• Mitre squid and Inshore squids nei – China <ul style="list-style-type: none"> <li>○ Current Health - <math>&lt; 6</math></li> <li>○ Future Health - <math>&lt; 6</math></li> </ul> </li> </ul> <p>Seafood Watch recommendations:</p> <p>According to data from 2023, 46.8% of China’s squid production is rated as Good Alternative by Seafood Watch, encompassing jumbo flying squid. Additionally, 35.1% is rated Avoid, encompassing Argentine shortfin squid, Various squids nei, Common squids nei, and Japanese flying squid. An additional 18% of China’s squid catch is not yet rated, encompassing numerous squid species caught in small volumes. <a href="#">Certification and Ratings Collaboration, 2023</a></p> <p>Squid caught in the Northwest Pacific Ocean, the Western Central Pacific Ocean, the Indian Ocean, and the Southwest Atlantic Ocean is rated by Seafood</p>	<p><a href="#">FishSource</a></p> <p><a href="#">Certification and Ratings Collaboration, 2023, Data Tool: Environmental Performance</a></p> <p><a href="#">Seafood Watch, 2024, Seafood Recommendations</a></p>

Indicator	Description	Sources
	<p>Watch as Avoid. Jumbo flying squid caught in the Southeast Pacific Ocean is rated by Seafood Watch as a Good Alternative. <a href="#">Seafood Watch, 2024</a></p>	
<p>Evidence of correlated practices</p>	<p>IUU fishing</p> <p>There are serious concerns regarding IUU fishing in China’s fishing industry including in relation to the country’s distant water squid fishing fleet.</p> <p>The IUU Fishing Index ranks China 1<sup>st</sup> out of 20 Asia countries, and 1<sup>st</sup> out of 20 Western Pacific countries. Of the three categories assessed (Vulnerability, Prevalence, and Response), China scores worst against indicators under the flag score and port score.</p> <ul style="list-style-type: none"> <li>• IUU Fishing Risk Index 2023 score: 3.69 (1 is the best, and 5 the worst)</li> <li>• IUU Fishing Risk Index 2023 rank: 1/152 countries</li> </ul> <p>(Higher scores and ranks closer to 1 indicate worse performance). <a href="#">IUU Fishing Risk Index 2023</a></p> <p>In the 2023 Report to Congress by NOAA Fisheries, the PRC received negative certifications for failing to take actions to remedy their reported activities. The National Marine Fisheries Service (NMFS) identified China in 2020, 2021, and 2022 for having vessels that violated conservation and management measures adopted by several regional fisheries management organizations and for failing to take appropriate corrective actions. Among them were violations of shark, turtle, and transshipment-related conservation measures. <a href="#">NOAA Fisheries, August 2023</a></p> <p>Of the 751 Chinese squid vessels studied by The Outlaw Ocean Project’s investigation, more than 100 vessels were found to have engaged in IUU fishing activities, including targeting protected species, operating without proper licenses, and discarding excess fish into the sea. Other environmental and</p>	<p><a href="#">IUU Fishing Index 2023</a></p> <p><a href="#">European Commission, Overview of existing procedures as regards third countries</a></p> <p><a href="#">NOAA Fisheries, August 2023, 2023 Report to Congress Improving International Fisheries Management</a></p> <p><a href="#">The Outlaw Ocean Project, 2023, Findings</a></p> <p><a href="#">Urbina, I., 25 February 2024, ‘Inside North Korea’s Forced-Labor Program’, The New Yorker</a></p> <p><a href="#">Seto, K.L., Miller, N.A., Kroodsmā, D., Miyahara, M., Saito, R., Boerder, K., Tsuda, M., Oozeki, Y., and Urrutia S., O., 2023. Fishing through the cracks: The unregulated</a></p>

Indicator	Description	Sources
	<p>fishing-related offenses and risk indicators that were recorded include Chinese ships unlawfully entering the waters of other nations, disabling locational transponders in violation of Chinese law, breaching U.N. sanctions prohibiting foreign fishing in North Korean waters, employing deceptive practices like transmitting dual identities, engaging in shark finning of protected species, fishing without licenses, and using prohibited fishing gear.</p> <p>The most prevalent environmental violation was found to be Chinese ships fishing in the waters of other countries. Chinese fishing vessels are alleged to have engaged in IUU fishing in the waters of several countries including North Korea, Russia, Argentina, Ecuador, Peru, Chile, Taiwan, Yemen, Oman, Ghana, and Sierra Leone.</p> <p>For example:</p> <p>At least 11 Chinese squid vessels suspected of illegal fishing in Argentinian waters have been pursued by local naval authorities since 2010, according to the government. Notably, some of these ships were owned by the company China National Fisheries Corporation, which sells calamari in the United States, Canada, and Europe.</p> <p>At least eight Chinese vessels have been sanctioned by Peru since 2018 for illegal fishing inside the country's waters.</p> <p>Satellite data and at-sea reporting indicate that at least 170 Chinese squid vessels were involved in IUU fishing activities in and around Yemeni and Omani waters between 2015 and 2019. <a href="#">The Outlaw Ocean Project, 2023</a></p> <p>The Outlaw Ocean Project also identified a risk of Chinese fishing companies buying fish from North Korean fishing vessels at sea. A leaked North Korean letter from 2022 proposed selling 10,000 tons of</p>	<p><a href="#">nature of global squid fisheries. Science Advances, Vol.9 (10).</a></p> <p><a href="#">Associated Press, November 1 2022, China fishing fleet defied U.S. in standoff on the high seas</a></p> <p><a href="#">Associated Press, September 24 2021, Great Wall of Lights: China's sea power on Darwin's doorstep</a></p> <p><a href="#">Gutiérrez, M., Daniels, A., Jobbins, G., Almazor, G. G., and Montenegro, C., 2020. China's distant-water fishing fleet: Scale, impact and governance. ODI.</a></p> <p><a href="#">Urbina, I., Mckenzie, P., and Schwartzman, M., August 2024, Taking Over From the Inside: China's Growing Reach Into Local Waters</a></p> <p><a href="#">EJF, 2022, The Ever-Widening Net: Mapping the scale, nature and</a></p>

Indicator	Description	Sources
	<p>squid to a Chinese company in return for more than eighteen million dollars and five hundred tons of diesel fuel. <a href="#">Urbina, 25 February 2024</a></p> <p>In August 2022, a US Coast Guard vessel attempted to inspect a fleet of Chinese squid fishing boats near Ecuador’s Galapagos Islands for signs of IUU fishing. But, the Chinese captains of several fishing boats sped away, with one reportedly turning aggressively toward the Coast Guard vessel and forcing it to take evasive action. <a href="#">Associated Press, November 1 2022</a></p> <p>In 2021, the Associated Press (AP) joined a voyage to observe the Chinese DWF fleet in the high seas off South America. The AP observed 30 vessels up close, of which it reports, 24 had a history of labor abuse accusations, past convictions for illegal fishing, or showed signs of possibly violating maritime law. <a href="#">Associated Press, September 24 2021</a></p> <p>Gutiérrez <i>et al.</i> (2020) identifies 183 Chinese DWF vessels connected with IUU fishing activities, including vessels on public IUU registries, reports of suspected IUU vessels, and vessels convicted for IUU fishing. <a href="#">Gutiérrez et al., 2020</a></p> <p>On March 14, 2016, a Chinese squid jigger, the Lu Yan Yuan Yu 10, was observed fishing illegally in Argentine waters off the coast of Patagonia. When spotted by an Argentine coast guard, the ship was ordered to stop but instead attempted to flee. After warning shots were fired, the jigger tried to ram the coast-guard vessel, prompting the coast guard to fire directly at the ship, leading to its eventual sinking. Since 2010, the Argentine navy has chased at least 11 Chinese squid vessels from Argentine waters due to suspected illegal fishing activities, according to government reports. <a href="#">Urbina, Mckenzie, and Schwartzman, August 2024</a></p> <p>Between 2015 and 2019, IUU fishing incidents involving the Chinese DWF fleet were largely</p>	<p><a href="#">corporate structures of illegal, unreported and unregulated fishing by Chinese distant-water fleet.</a></p> <p><a href="#">EJF, 17 September 2025, BRIGHT LIGHTS, DIM PROSPECTS, EJF, September, 2025</a></p> <p><a href="#">Straight Arrow News (SAN), February 2025, Argentina deploys naval patrols to counter foreign fishing activity</a></p> <p><a href="#">C4ADS, June 2025, KEEPING THE LIGHTS ON— Uncovering the Networks Enabling the Distant Water Squid Fleet</a></p>

Indicator	Description	Sources
	<p>attributed to squid jiggers (20%), accounting for 20% of these cases. Squid jigger vessels were involved in 69 IUU incidents, with most occurring within Argentina’s Exclusive Economic Zone (EEZ) (61%), followed by areas under the SPRFMO jurisdiction (16%) and other high seas (6%). <a href="#">EJF, 2022</a></p> <p>Much of the fishing pressure on Argentine shortfin squid occurs just outside Argentina’s Exclusive Economic Zone, in the high-seas area known as “Mile 201,” which has become one of the world’s largest unregulated squid fisheries. With virtually no regional oversight, scientific assessment, or harvest controls, fishing effort there is largely unmonitored and frequently goes unreported. The unregulated nature of this zone attracts a large distant-water fleet dominated by foreign-flagged squid-jigging vessels—primarily from China, which accounts for nearly three-quarters of the fleet, followed by Taiwan and South Korea. These vessels collectively conduct most of the fishing activity in the area, with Chinese-flagged vessels alone responsible for roughly 91% of observed fishing effort. Because they operate in an unmanaged high-seas region and often fail to report catches, their activities contribute significantly to IUU risks, threatening both the sustainability of <i>Illex</i> stocks and the broader ecological stability of the Southwest Atlantic.</p> <p>According to findings from research carried out by EJF in 2025, which included interviews with crew on Chinese squid jiggers in the Southwest Atlantic, crew members on Chinese vessels reported that ship names and identification numbers were purposefully concealed to evade monitoring, a practice that violates China’s own maritime regulations. Additionally, Chinese vessels were also implicated in the capture of sharks, seabirds, and marine mammals including endangered species. Argentina has intensified its maritime enforcement efforts to combat IUU fishing, particularly targeting China’s distant-water fleet, which is suspected of entering its</p>	

Indicator	Description	Sources
	<p>Exclusive Economic Zone undetected by switching off tracking systems. <a href="#">EJF, 17 September 2025</a></p> <p>Argentina has a history of confronting illegal fishing, notably sinking a Chinese trawler in 2016 after it was caught illegally fishing and attempted to flee. Since then, surveillance operations have intensified, especially during peak fishing seasons. <a href="#">SAN, February, 2025</a></p> <p>Analysis of AIS data from Global Fishing Watch indicates that fishing vessels owned by the Chinese fishing company Pingtan Marine Enterprise continue to operate in the Southwest Atlantic despite the company, its leaders, and affiliated companies being sanctioned by the US Department of the Treasury in December 2022 for human rights abuses and IUU fishing. According to C4ADS, the company has not only continued its operations but also expanded them, highlighting concerns about enforcement. <a href="#">C4ADS, June 2025</a></p>	
	<p>Transshipment</p> <p>There is evidence of transshipment frequently being used by Chinese squid fishing vessels.</p> <p>A large part of the business model for operating high seas fleets like the Southeast Pacific squid fleet involves the support provided by refrigerated cargo vessels, referred to as carrier vessels, and fuel tankers known as bunkering vessels. Carrier vessels engage in at-sea transshipment, transferring the catch from fishing vessels and transporting it to port. Additionally, carrier vessels facilitate crew changes and resupply fishing vessels with essential provisions. Bunkering vessels offer a fuel bunkering service while at sea. These at-sea services aim to enable fishing vessels to extend their fishing duration without the need to return to port.</p>	<p><a href="#">Global Fishing Watch, 2022, Analysis of the Southeast Pacific Distant Water Squid Fleet</a></p> <p><a href="#">Stop illegal fishing, 2020, China flagged vessels target unregulated North West Indian Ocean squid fishery</a></p> <p><a href="#">Pulitzer Center, 2023, They Catch Squid for the World's Table. But Deckhands on</a></p>

Indicator	Description	Sources
	<p>Analysis of AIS data showing the Southeast Pacific squid fleet’s fishing activity in 2021 identified 46 support vessels operating within the area, comprising 40 carrier vessels and 6 bunker vessels, with a total of 2,511 encounters with squid fishing vessels in the Southeast Pacific region. Out of the 46 support vessels, 15 were flagged to China and 17.9% of encounters were carried out by Chinese-flagged carriers. Notably, the Chinese fleet accounts for 17.9% of these encounters followed by Panama (72.2%). <a href="#">Global Fishing Watch, 2022</a></p> <p>Several refrigerated cargo vessels, commonly known as reefers, have been monitored in the northwest Indian Ocean, suggesting the occurrence of at-sea transshipment. Due to the absence of a regulatory framework governing this fishery, the transshipment remains unmonitored, including the offloading of squid from the reefers in Chinese ports. <a href="#">Stop illegal fishing, 2020</a></p> <p>In the report by The Outlaw Ocean Project, a squid jigger, He Bei 8599, engages in transshipment with a larger carrier vessel, Hai Feng 718, on the high seas in the South Atlantic. They claimed that transshipment enables fishing ships to travel farther from shore and remain at sea for longer periods of time, heightening the risk that workers will contract beriberi. <a href="#">Pulitzer Center, 2023</a></p> <p>An observer program in the Southeast Pacific was implemented in 2024 to monitor the jumbo flying squid fishery and collect scientific and biological data on jumbo flying squid. Fourteen observers and five research vessels participated in the program. In total, observers documented 1,308 active fishing days and monitored 28 transshipment events throughout the 2024 season. <a href="#">SPRFMO, September 2025</a></p> <p>AIS records show that from December 2021 to December 2024, about 89% of high-seas transshipment events involving the distant-water</p>	<p><a href="#">Chinese Ships Pay a Deadly Price</a></p> <p><a href="#">SPRFMO, September 2025, Annual Report of China to the Scientific Committee—Squid</a></p> <p><a href="#">C4ADS, June 2025, KEEPING THE LIGHTS ON—Uncovering the Networks Enabling the Distant Water Squid Fleet</a></p>

Indicator	Description	Sources
	<p>squid fleet were carried out by reefers that are ultimately owned by Chinese interests. Only 15 reefers were responsible for 72% of all AIS-linked transshipments with the squid fleet, and these same vessels were involved in 70% of transshipments with vessels of interest (VOI) –vessels known or suspected to have engaged in high-risk or illicit activities. The vessels Ning Tai 52, 57, and 6 were involved in numerous transshipment operations with Wei Fong reefers. In total, 22 Ningtai vessels appear on this report’s list of VOIs because of their suspected involvement in high-risk or illicit activities. Together, these Ningtai vessels carried out 140 likely transshipments with Wei Fong reefers, with seven of them meeting the reefers more than ten times over the study period. <a href="#">C4ADS, June 2025</a></p>	
	<p>Suspect or illegal flagging practices</p> <p>China is not listed as a flag of convenience (FOC) by the ITF’s fair practices committee but is known for its use of foreign vessel registries including flags of convenience by its distant water fishing fleet.</p> <p>Gutiérrez et al. (2020) identified a total of 16,966 Chinese DWF vessels, of which nearly 1,000 vessels were registered in other countries, including 518 flagged to African nations and 148 vessels registered in nations commonly regarded as flags of convenience (Panama, Cambodia, Belize, Vanuatu, St Vincent, Honduras, and Liberia). The five most frequently recorded flags states other than China were Ghana, Mauritania, Côte d’Ivoire, Fiji, and Panama. <a href="#">Gutiérrez et al., 2020</a></p> <p>The EJF report “OFF THE HOOK” delves into the exploitation of Africa’s fisheries by large industrial trawlers, notably those from China, highlighting the issue of flags of convenience in ongoing talks on ending harmful fishery subsidies at the World Trade Organization. The report uncovers extensive involvement of Chinese interests in Ghana’s trawl</p>	<p>International Transport Worker’s Federation (ITF) <a href="#">Flag of Convenience FOC countries</a></p> <p><a href="#">Gutiérrez, M., Daniels, A., Jobbins, G., Almazor, G. G., and Montenegro, C., 2020. China’s distant-water fishing fleet: Scale, impact and governance. ODI.</a></p> <p><a href="#">Environmental Justice Foundation (EJF), 2020, OFF THE HOOK– how flags of convenience let illegal fishing go unpunished</a></p>

Indicator	Description	Sources
	<p>sector, with Chinese companies utilizing Ghanaian front entities for vessel registration. Although officially documented as Ghanaian-owned, around 90-95% of the trawl fleet in Ghana is connected to Chinese interests, with eight Chinese companies beneficially owning approximately 75% of the fleet. These arrangements, marked by opacity, often involve hire purchase agreements. A separate investigation reveals that 35 trawlers across Ghana, Sierra Leone, and Guinea are ultimately owned by a Chinese state enterprise, Dalian Mengxin Ocean Fisheries, which has been involved in numerous illegal fishing offenses in Ghana since 2016, including transshipments at sea and capturing juveniles. <a href="#">EJF, 2020</a></p> <p>Mongabay Latam and Bloomberg Línea conducted an analysis of data provided by the Aquatic Resources Authority of Panama (ARAP) that listed Panamanian-flagged vessels that were sanctioned in the last 10 years. They found that nearly all the vessels subjected to sanctions from 2019 to 2021, totaling 28 out of 32, are not fishing vessels but refrigerated cargo vessels (reefers), and all of them are owned by foreign companies, particularly from China. During the examined period of 2019 to 2021, a total of 13 Panamanian-flagged reefer vessels were involved in unreported transshipments. And another seven vessels, including four reefers, faced sanctions for engaging in illegal fishing activities. <a href="#">Mongabay, 2022</a></p> <p>The report titled "Dark Webs" found that companies from five countries – China, Taiwan, Thailand, South Korea, and Spain – possess nearly two-thirds of the vessels accused of forced labor, based on available legal ownership data. Over 40% of industrial and semi-industrial fishing vessels implicated in forced labor were operating in Asia, followed by Africa (21%), Europe (14%), and LAC (11%). Additionally, a quarter of the accused vessels were flagged to China. <a href="#">Daniels et al., November 2023</a></p>	<p><a href="#">Mary Triny Zea, Michelle Carrere, 2022, Panama: A 'flag of convenience' for illegal fishing and lack of control at sea, Mongabay</a></p> <p><a href="#">Financial Transparency Coalition, 15 November 2023, 1 in 4 fishing vessels accused of forced labour owned by European companies, a quarter flagged to China</a></p> <p><a href="#">Daniels, A., Kohonen, M., Eroni, E., and Thiam, M., November 2023, Dark Webs: Uncovering those behind forced labour on commercial fishing fleets</a></p> <p><a href="#">Combined IUU Vessels List</a></p> <p><a href="#">Urbina, I., Mckenzie, P., and Schwartzman, M., August 2024, Taking Over From the Inside: China's</a></p>

Indicator	Description	Sources
	<p>Interpol lists 12 vessels flagged to China:</p> <ol style="list-style-type: none"> <li>1. LU RONG SHUI 158m 鲁荣水 158</li> <li>2. ZHOU YU 808, 809, 舟渔 808, 809</li> <li>3. ZHOU YU 657</li> <li>4. ZHEXIANG YU 23029</li> <li>5. YUANDA 6,8</li> <li>6. SHUN CHANG NO. 3, SHUN CHANG 3, 顺昌 3 号</li> <li>7. LU RONG YUAN YU YUN 958</li> <li>8. LU RONG YUAN YU 812, LURONGYUANYU812</li> <li>9. LU RONG YUAN YU 797, 787</li> <li>10. LU RONG YUAN YU 109, 108, 106, 105, 102, 101,</li> <li>11. LU RONG YU 612,</li> <li>12. LU RONG SHUI 158, 鲁荣水 158</li> </ol> <p><a href="#">Combined IUU Vessels List</a></p> <p>According to The Outlaw Ocean Project, Chinese companies now control at least 62 industrial fishing vessels operating under the Argentine flag, including a large portion of Argentina's squid fleet. Many of these companies have allegedly been linked to illegal activities such as dumping fish at sea, disabling transponders, and committing tax evasion and fraud. <a href="#">Urbina, Mckenzie, and Schvartzman, August 2024</a></p> <p>Chinese companies also control a significant portion of the reefer vessels linked to transshipments with the distant water squid fleet. Although none of the reefers operate under the Chinese flag, corporate documents reveal that all 15 reefer vessels identified by C4ADS as operating in the 2021-2024 period are owned by Chinese companies or individuals through entities registered in Hong Kong or Liberia. <a href="#">C4ADS, June 2025</a></p>	<p><a href="#">Growing Reach Into Local Waters</a></p> <p><a href="#">C4ADS, June 2025, KEEPING THE LIGHTS ON— Uncovering the Networks Enabling the Distant Water Squid Fleet</a></p> <p><a href="#">Straight Arrow News (SAN), February 2025, Argentina deploys naval patrols to counter foreign fishing activity</a></p> <p><a href="#">EJF, 17 September 2025, BRIGHT LIGHTS, DIM PROSPECTS, EJF, September, 2025</a></p>

Indicator	Description	Sources
	<p>China has sought to expand its presence in the South Atlantic region through legal means, such as forming partnerships with local fishers or operating under foreign-flagged vessels to bypass fishing restrictions. <a href="#">SAN, February, 2025</a></p> <p>In mid-2024, Argentina had 80 licensed squid-jigging vessels operating within its Exclusive Economic Zone (EEZ), all flying the Argentine flag as required by national regulations. Despite these requirements, ownership data indicate that approximately 43 vessels—around 54% of the fleet, were ultimately controlled by Chinese parent companies. Qingdao Haoyang Fisheries, a subsidiary of China’s Shandong Bodelong Group, expanded its presence in Argentina through “flagging-in” arrangements, acquiring local companies and replacing older vessels with Chinese-built jiggers while retaining existing quotas. By 2024, Shandong Bodelong controlled at least nine Argentine-licensed vessels through local subsidiaries, demonstrating the significant role of foreign ownership in the sector. Vessels previously linked to the group have been associated with allegations of labor abuses, unsafe medical evacuation practices, and environmental violations while operating under the Chinese flag. Investigations by environmental organizations have documented patterns of forced labor and worker mistreatment in the regional distant-water fleet, raising concerns about compliance with Argentine law, maritime safety standards, and the broader impacts of IUU fishing. <a href="#">EJF, 17 September 2025</a></p>	
	<p>AIS dark spots to conceal criminal activities</p> <p>A 2019 review of AIS-based fishing activity did not find any AIS regulations for China. However, China has the region’s largest fleet, with almost 250,000 total motorized fishing vessels and just over 35,000 vessels over 24 m. At least half of these large vessels</p>	<p><a href="#">FAO, 2019, Global Atlas of AIS-based fishing activity—challenges and opportunities</a></p>

Indicator	Description	Sources
	<p>appear to regularly use AIS. However, AIS usage among the remaining motorized fishing vessels is low. Very few of the vessels under 24 m appear to broadcast AIS. <a href="#">FAO, 2019</a></p> <p>Global Fishing Watch has consistently highlighted concerns over anomalies in the vessel tracking systems of Chinese squid jiggers. These concerns encompass instances of vessels concurrently employing multiple electronic identities, multiple vessels sharing a single identity, and suspicions of manipulating onboard transceivers to broadcast false positions. <a href="#">Sea Shepherd, 2021</a></p> <p>In 2021, the Associated Press (AP) joined a voyage to observe the Chinese DWF fleet in the high seas off South America. The AP observed 30 vessels up close, of which it reports 16 vessels had turned off their mandatory safety transponders, broadcast multiple electronic identities, or transmitted information that didn't match the vessel's listed name or location. <a href="#">Associated Press, September 24 2021</a></p> <p>In certain cases, vessels may transmit an AIS position beyond the reception range of the receiving satellite. The erroneous AIS positions create the illusion that the vessel is situated in a different location than its actual position. This discrepancy can arise due to data corruption or intentional tampering with the system, aiming to conceal the vessel's true location. Investigative action by relevant authorities is necessary to determine the cause of such discrepancies. Global Fishing Watch has developed a method to rectify this offset, wherein a vessel's track is adjusted within the satellite's reception range, utilizing stationary objects like coastlines and ports to identify the most probable accurate positions. Ten vessels were identified with AIS positions beyond the satellite's footprint, and these instances were brought to the attention of China. The false AIS</p>	<p><a href="#">Sea Shepherd, 2021, Sea Shepherd Tracks Down and Exposes Notorious Chinese Squid Fishing Fleet off the Galapagos Islands</a></p> <p><a href="#">Associated Press, September 24 2021, Great Wall of Lights: China's sea power on Darwin's doorstep</a></p> <p><a href="#">Global Fishing Watch, 2022, Analysis of the Southeast Pacific Distant Water Squid Fleet</a></p> <p><a href="#">Environmental Justice Foundation (EJF), 2022, The Ever-Widening Net: Mapping the scale, nature and corporate structures of illegal, unreported and unregulated fishing by Chinese distant-water fleet</a></p>

Indicator	Description	Sources
	<p>positions gave the impression that the vessels were operating in the southwest Pacific.</p> <p>Instances of vessels using multiple MMSI numbers occur when a vessel transmits its AIS location using two distinct MMSI numbers. Each vessel should have a unique MMSI number assigned by the flag State, making the use of different numbers irregular and potentially in violation of IMO regulations and flag State rules concerning maritime radio licensing. In 2021, twenty-one squid vessels were observed utilizing multiple AIS devices with different MMSI numbers, collectively operating 42 MMSI numbers within the AOI (Figure 5 and 6). These fishing vessels, all authorized by the SPRFMO, were flagged to China. It remains unclear whether the disparities in MMSI numbers are a result of using different broadcasting devices, satellite signal detection errors, or human errors in managing the AIS device. The exact reason for vessels employing multiple AIS devices with different MMSI and identity information is not clearly understood. <a href="#">Global Fishing Watch, 2022</a></p> <p>Chinese fishing vessels have been known to evade monitoring by deactivating their AIS transmitters. <a href="#">Environmental Justice Foundation, 2022</a></p>	
Workforce Characteristics	<p>The proportion of fishers that are migrant workers</p> <p>Migrant workers are employed in China’s DWF squid fishery, but the current proportion of fishers that are migrant workers is unknown.</p> <p>According to the report “Dark Webs”, fishers employed in the squid DWF fleet operating in the high seas off South America are mostly from China with some crew from Indonesia, the Philippines, and countries in Africa. The fleet comprises mostly Chinese vessels in the Pacific and Chinese, Taiwanese,</p>	<p><a href="#">Daniels, A., Kohonen, M., Eroni, E., and Thiam, M., November 2023, Dark Webs: Uncovering those behind forced labour on commercial fishing fleets</a></p> <p><a href="#">The Outlaw Ocean Project, October</a></p>

Indicator	Description	Sources
	<p>South Korean, and Spanish vessels in the Atlantic. <a href="#">Daniels et al., November 2023</a></p> <p>The Outlaw Ocean Project said that Chinese fishing vessels previously depended heavily on foreign labor, especially from Indonesia but have since shifted to recruiting more workers from within China following the COVID-19 pandemic. <a href="#">The Outlaw Ocean Project, 2023</a></p> <p>The regulations outlined in the “Measures for the Management of the Fishery Crew of PRC” (Crew Management Measures) stipulate a maximum of 30% foreign crew members on Chinese vessels. Nevertheless, based on interviews conducted by EJF with crew members working on Chinese vessels, the actual percentage of foreign crew members frequently exceeds this limit, ranging between 57% and 61%. According to EJF, the Chinese regulations governing the hiring of foreigners remain strict, particularly for fishers and sailors categorized as “low-skilled workers” However, this 2022 report states that there is a growing demand for foreign crew members on Chinese fishing vessels, which contrasts with the more recent evidence outlined above from The Outlaw Ocean Project stating that there has been a shift away from the use of foreign crew. <a href="#">EJF, 2022</a></p>	<p><a href="#">2023, Crimes at sea: The superpower of seafood – Findings</a></p> <p><a href="#">EJF, 2022, Murky Waters: Analysis of the regulatory framework governing the distant water fishing fleet of the People’s Republic of China</a></p>
	<p>A high proportion of fishers from ethnic minority and other marginalized groups</p> <p>Unknown.</p>	
Recruitment and Contracts	<p>Use of recruitment agents</p> <p>There is evidence of recruitment agents being used to hire workers on Chinese fishing vessels. According to an online news report from Shandong Television in April 2015, deckhands are frequently enticed to port cities with the prospect of well-paying contracts, only to realize that securing a job involves paying a series</p>	<p><a href="#">Urbina et al., 07 November 2023, ‘Trapped on Chinese squid-fishing ships, crews face beatings,</a></p>

Indicator	Description	Sources
	<p>of fees. Typically, these fees are paid upfront or through loans obtained from agents who recruit workers for maritime positions. The fees, equivalent to several months' wages, encompass various expenses such as travel to the ship, job training, insurance, bedding, crew certifications, medical examinations, as well as provisions for food and protective workwear. <a href="#">Urbina et al., 07 November 2023</a></p>	<p><a href="#">malnutrition and more', L.A Times</a></p>
	<p>Contract-and compensation- related regulations and practices</p> <p>According to the report “Dark Webs”, fishers employed in the squid DWF fleet operating in the high seas off South America sign employment contracts valid for one to two years. Most of these contracts are written in Chinese rather than the language of the workers and the terms are not necessarily understood by the workers, leaving them vulnerable to exploitation. <a href="#">Daniels et al., November 2023</a></p> <p>According to The Outlaw Ocean Project, workers are frequently recruited to work on Chinese fishing vessels by employment agencies that include undisclosed expenses and upfront recruitment fees into their contracts, resulting in debt bondage. <a href="#">The Outlaw Ocean Project, 2023</a></p> <p>To receive their full payment, crew members on Chinese fishing vessels typically need to fulfill the entirety of their contractual terms, which frequently involve significant financial penalties for attempting to depart before the designated contract period concludes. <a href="#">Urbina et al., 07 November 2023</a></p> <p>Article 28 of the DWF Regulations outlines the responsibilities of DWF companies in safeguarding the rights and safety of workers aboard Chinese DWF vessels. These obligations seem to be applicable to both Chinese and foreign workers on these vessels and include: (I) Entering into a contract directly with</p>	<p><a href="#">Daniels, A., Kohonen, M., Eroni, E., and Thiam, M., November 2023, Dark Webs: Uncovering those behind forced labour on commercial fishing fleets</a></p> <p><a href="#">The Outlaw Ocean Project, October 2023, Crimes at sea: The superpower of seafood – Findings</a></p> <p><a href="#">Urbina et al., 07 November 2023, 'Trapped on Chinese squid-fishing ships, crews face beatings, malnutrition and more', L.A Times</a></p> <p><a href="#">EJF, 2022, Murky Waters: Analysis of the regulatory framework governing the distant water</a></p>

Indicator	Description	Sources
	the employed crew member or the entity where they work. (II) Procuring appropriate insurance for the crew members. (III) Ensuring timely payment of wages. (IV) Protecting their lawful rights and interests. <a href="#">EJF, 2022</a>	<a href="#">fishing fleet of the People’s Republic of China</a>

Table 3: China-- Fishing indicators

## China: Processing indicators

Indicator	Description	Sources
Direct evidence of forced labor, human trafficking, and hazardous child labor	<p>Since 2018, ten major seafood companies in Shandong have participated in forced labor transfer programs from Xinjiang, receiving over a thousand Uyghurs and other Muslim minorities. Among these companies, five have exported more than 47,000 tons of seafood to numerous importers in the United States during this period. Notably, processing plants owned by three of these conglomerates have contributed to 17% of all squid exported from China to the United States. over the past five years. The report also identifies the use of North Korean labor in seafood processing in Liaoning Province and identifies squid among the products exported to the United States by processing plants implicated in using North Korean labor. <a href="#">The Outlaw Ocean Project, 2023</a></p> <p>According to a 2023 submission to the Congressional-Executive Commission on China, seafood processed by North Korean workers includes squid among other species. The employment of North Korean workers in Chinese seafood processing plants has been linked to allegations of forced labor and human trafficking, with reports of deceptive recruitment practices, workers’ identity documents being confiscated, isolation, long working hours, unsafe working conditions, debt incurred in North Korea to secure overseas work, lower wages than Chinese workers, unpaid overtime, and wage deductions by the North Korean government. In August 2023, all or most North Korean workers were repatriated back to North Korea, with witnesses</p>	<p><a href="#">The Outlaw Ocean Project, October 2023, Crimes at sea: The superpower of seafood – Findings</a></p> <p><a href="#">Scarlatoiu, G., Committee for Human Rights in North Korea (HRNK), 24 October 2023, “From Bait to Plate-How Forced Labor in China Taints America’s Seafood Supply Chain”, A Hearing of the Congressional-Executive Commission on China (CECC)</a></p> <p><a href="#">US Department of Labor, 2024, 2024 List of Goods Produced by Child</a></p>

	<p>speculating that North Korean workers will not be used in seafood processing facilities in China again, with China instead building processing plants in North Korea. <a href="#">Scarlatoiu, Committee for Human Rights in North Korea (HRNK), 24 October 2023</a></p> <p>Following the reported allegations from The Outlaw Ocean Project, the US Department of Labor notably began listing squid as a good produced by forced labor in China’s squid processing industry in Shandong Province in its 2024 List of Goods Produced by Child Labor or Forced Labor. <a href="#">US Department of Labor, 2024</a></p>	<a href="#">Labor or Forced Labor</a>
ILO indicators of forced labor and ILO R190 definition of hazardous child labor	None found.	
Processing Characteristics	<p>Processing stage</p> <p>The squid processing technology is adapted according to the product category. Currently, the market offers various types of semi-finished squid products, primarily falling into two categories: skin treatment and peeling treatment. Under the peeling treatment category, products include squid tentacles, squid heads, squid plates, whole beans, frozen squid, and more. In the moulting treatment category, products encompass peeling squid rings, peeling squid tubes, squid stalks, ear stalks, etc. These two major product categories involve the use of distinct processing methods. <a href="#">Zhihu, 2023</a></p>	<a href="#">Zhihu, 2023, Shandong Squid Processing</a>
	<p>Consolidation and vertical integration</p> <p>The first level of the squid industry chain primarily includes squid resources, fishing boats, and various raw materials and equipment. China primarily sources squid from inshore and offshore fishing operations. Next, the squid industry chain predominantly involves direct sales to customers through various channels such as food processing plants, distribution and retail outlets, foreign trade exports, and other sales channels. Processed squid products reach the catering market or</p>	<a href="#">Hunan Province, 2023, 一文深度了解2023年中国鱿鱼行业市场规模、产业链及前景趋势——智研咨询发布</a>

	consumers through avenues like supermarkets, wholesale markets, brand stores, bazaars, and similar channels. <a href="#">Hunan Province, 2023</a>	
	<p>Domestic versus export</p> <p>According to a report by Huajing Intelligence Network, China's squid production in 2021 was 640,000 tons, accounting for 28.49% of the total production, up 6.03% from the previous year, and the catch of tuna and squid accounted for more than 40% of the total catch.</p> <p>According to the investment prospectus of Ocean Family (Zhejiang) Co., Ltd., the world's annual squid consumption is more than 2.7 million tons, and China's squid consumption reaches 800,000 to 900,000 tons, accounting for one-third of the world's squid production every year. <a href="#">Jiemian Media, October 2023</a></p> <p>In 2022, China exported approximately 104,600 tons of squid-related products, indicating a decrease of 22,200 tons compared to the previous year (2021). However, the export revenue for 2022 amounted to \$1.316 billion, marking an increase of \$231 million compared to the figures from 2021. <a href="#">Shuxue qing, September, 2023</a></p>	<p><a href="#">Jiemian Media, October 2023, 中国每年远洋捕捞230万吨海产品，中国消费者每年要吃掉全球鱿鱼产量的三分之一</a></p> <p><a href="#">Shuxue qing, September, 2023, 智研咨询报告：2023年中国鱿鱼行业市场现状及未来发展趋势分析</a></p>
Workforce Characteristics	<p>Skilled versus low-skilled</p> <p>In the past few years, with the growth in squid production and advancements in the domestic seafood processing industry, there has been a noticeable improvement in squid processing. Domestic squid processing companies are consistently enhancing their processing equipment and refining production processes to ensure the efficient utilization of products. Notably, the Weihai Science and Technology Bureau has implemented an 'open listing system' to address prevalent key technical challenges in squid and other seafood processing. <a href="#">Xianjichina, 2023</a></p>	<p><a href="#">Xianjichina, 2023, 国内的鱿鱼加工企业不断升级设备和工艺，一企业生产效率提升40%以上</a></p>
	The proportion of women in the workforce	

	Unknown.	
	<p>The proportion of migrant versus local workers</p> <p>Unknown.</p> <p>Internal migrant workers are known to be employed in squid processing, but the proportion of migrant workers is unknown. <a href="#">Urbina, I., 9 October 2023</a></p>	<p><a href="#">Urbina, I., 9 October 2023, 'The Uyghurs Forced to Process the World's Fish', The Outlaw Ocean Project</a></p>
	<p>The proportion of minority or indigenous workers</p> <p>Unknown.</p>	
	<p>The proportion of temporary and contract versus permanent workers</p> <p>Unknown.</p>	
	<p>Workers' origins</p> <p>Between 2014 and 2019, as per government statistics, Chinese authorities relocated more than 10% of Xinjiang's population annually, equivalent to over two and a half million people, through labor transfers. Approximately twenty-five thousand people were sent out of the region each year. Shandong Province on the eastern coast of China serves as a significant seafood-processing center. Since 2018, at least a thousand Uyghurs have been dispatched to work in seafood-processing factories in Shandong. This process is described as "door-to-door," involving the direct delivery of individuals from collection points in Xinjiang to the respective factories, as highlighted by Zenz. <a href="#">Urbina, I., 9 October 2023</a></p> <p>There is some evidence to suggest that internal migrant workers from Xinjiang, as well as foreign migrant workers from North Korea, are employed in seafood processing plants that export squid to the United States. <a href="#">The Outlaw Ocean Project, 2023</a></p>	<p><a href="#">Urbina, I., 9 October 2023, 'The Uyghurs Forced to Process the World's Fish', The Outlaw Ocean Project</a></p> <p><a href="#">The Outlaw Ocean Project, October 2023, Crimes at sea: The superpower of seafood – Findings</a></p>
	<p>Migrant worker language (vs. dominant language in the industry)</p>	

	Unknown.	
	GDP per capita of processing country and main worker source country  Unknown.	
	Legal presence (regularity) of migrant workers  Unknown.	
	The ability of migrant workers to change jobs  Unknown.	
Recruitment and Contracts	Use of contractors and recruitment agents  Unknown.	
	Compensation method  Unknown. The minimum wages in squid processing are unknown.	

Table 4: China - Processing indicators

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