

Warmwater shrimp social risk profile

Forced labor, human trafficking, and hazardous
child labor risks

Bangladesh, Aquaculture and Processing

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SEAFOOD SOCIAL RISK TOOL V2

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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.

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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

Bangladesh is the world's second largest exporter of giant tiger shrimp (*Penaeus monodon*) after Vietnam. Giant tiger shrimp comprises over 51% of Bangladesh's annual shrimp production and 70% of the country's total shrimp and prawn exports.^{0Fⁱ} The South Asian country mainly exports giant tiger shrimp in peeled form. Seventy-five percent of Bangladeshi giant tiger exports are sent to Europe.^{1Fⁱⁱ} Besides giant tiger shrimp, the country produces and exports giant river prawn (*Macrobrachium rosenbergii*) and several other species. Shrimp and prawn production predominantly takes place in the Khulna Division in southwest Bangladesh and supplies processing factories in the major seaport cities and main processing clusters in the Khulna Division and the Chittagong Division, primarily the Khulna, Satkhira, and Jessore districts and Chittagong and Cox's Bazar districts, respectively.^{2Fⁱⁱⁱ} The shrimp and prawn supply chain is characterized as long and complex and while sources vary on exact numbers, there are estimated to be between 600,000 people involved directly supporting 3.5 million dependents^{3F^{iv}} to 8.5 million people living in the coastal area who depend on the sector for their livelihood.^{4F^v} Shrimp and prawn exports are Bangladesh's second largest export product after textiles and the sector is responsible for 70% of Bangladesh's total agricultural exports.^{5F^{vi}}

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

The overall assessment based on the SSRT country level indicators is that the base risk of forced labor, human trafficking, and hazardous child labor in Bangladesh remains high despite national efforts to address this systemic problem. Increasing awareness and political commitment to combatting forced labor, human trafficking, and hazardous child labor in combination with pressure from global markets and international brand image will have positive effects on the levels of risk in Bangladesh. But the systemic and prevalent nature of the problems means that eradication is a long-term goal and process. Factors that contribute to an increased risk of forced labor and human trafficking include poverty, gender discrimination, and climate induced displacement.^{6F^{vii}},^{7F^{viii}} Specifically for child labor, additional factors include unaffordable costs of education such as stationary, uniforms etc. and the inability to work and attend school at the same time, a large rural population where households are mainly reliant on income from agriculture, and the cultural acceptance of children supporting their parents in agricultural work.^{8F^{ix}},^{9F^x} In addition, Bangladesh has a large population of Rohingya refugees, who are especially vulnerable to human trafficking as they lack sufficient protections and are denied access to schooling and working legally.^{10F^{xi}},^{11F^{xii}} Crises such as the COVID-19 pandemic and climate-induced disasters disproportionately affect the most vulnerable individuals in society, making these people more susceptible to exploitation.^{12F^{xiii}}

Bangladesh has made advances toward eliminating child labor, forced labor, and human trafficking by ratifying the Minimum Age Convention (C138) and the Protocol of 2014 to the Forced Labour Convention (P029) in 2022, but gaps in legislation and barriers to its effective implementation remain. The legal minimum age for work does not meet international standards and the definition of hazardous work does not cover all sectors with dangerous working conditions. Labor laws do not cover the informal sector, which employs most of the country's working population, including child laborers. Additionally, there is a lack of legal provisions and oversight to protect vulnerable groups such as migrant workers and refugees from exploitative practices. As Bangladesh is primarily a sending country for migrants, legal protections for migrant workers are focused on Bangladeshis working overseas rather than foreign migrant workers residing in Bangladesh.^{13F^{xiv}}

Workers have limited mechanisms to address exploitative conditions through freedom of association. The 2023 Global Rights Index considers Bangladesh to be one of the ten worst countries in the world for working people.^{14F^{xv}} The presence of regressive laws and obstacles to forming unions are some of the reasons for this ranking. Additionally, intimidation, corruption, and violence have suppressed union organizing, and attempts to unionize have led in some cases to mass dismissals of workers, who also risk becoming blacklisted in their sector.^{15F^{xvi}, 16F^{xvii}} Worker strikes are sometimes met by brutal repression by the industrial police, a specialized police unit that operates in Bangladesh's industrial zones, which has resulted in numerous deaths of protestors in the last couple of years.^{17F^{xviii}, 18F^{xix}} There have also been examples of union leaders being beaten, sometimes resulting in death, instilling a climate of fear that deters activist from forming unions.^{19F^{xx}, 20F^{xxi}, 21F^{xxii}} Through organizations such as International Accord steps are being taken to improve collective bargaining and working conditions, specifically in the textile sector.^{22F^{xxiii}}

Furthermore, there are barriers in place to the effective enforcement of labor laws and the protection of victims. Insufficient resources for labor inspections, a lack of authority to file child labor cases to criminal court, and official complicity in human trafficking and trafficking-related corruption are serious concerns that hinder law enforcement.^{23F^{xxiv}} There is still much work to be done to identify and care for trafficking victims and there are large gaps in protections for child laborers as there is no system to get children that are removed from factories into social services and support programs.

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

Bangladesh's seafood industry has been linked to human rights and labor rights violations, including human trafficking, forced labor, and hazardous child labor, in fishing and shrimp and dried fish production. While progress has been made over the last decade to reduce child labor in

seafood processing, there is still a high risk of human rights and labor rights violations occurring in different parts of the country's seafood industry.

The rapid expansion of the shrimp industry since the 1980's was backed by the Bangladeshi government to capitalize on the international demand for cheap shrimp products. The conversion of rice paddies to aquaculture ponds was considered by development agencies as a smart adaptation to increasing salination and climate change as well as to lift communities out of poverty.^{24F^{xxxv}} However, the development of the shrimp sector was not accompanied by the development of appropriate regulation and oversight, and expansion often occurred illegally due to corruption and weak governance structures.^{25F^{xxvi}} The expansion of shrimp ponds led to tensions and deadly conflicts, with reported incidents over the period of 1980-2000 of intimidation and violence, murder, rape, false imprisonment, land seizures and community displacement, and sabotaging land through inundating rice paddies with saline water.^{26F^{xxvii},27F^{xxviii}}

Significant regulatory gaps remain and most of the shrimp sector is unregistered and informal.^{28F^{xxix}} Gaps in national child labor laws affect the seafood industry, including shrimp production. The Bangladesh Labor Act does not apply to the informal sector, such as shrimp fry catching and small-scale shrimp farming. As a result, laws governing the minimum age for work are not implemented and enforced, thus failing to protect children engaged in informal activities.^{29F^{xxx}} There is widespread social and cultural acceptance of children supporting their family's economic activities, to an extent that it may deteriorate into child labor (e.g., children performing hazardous tasks in agriculture or the household).^{30F^{xxxi}} In addition, activities such as wild shrimp fry collection and drying fish are not included in the official list of hazardous work. Many children continue to work in wild fry catching where they are at risk from drowning, attack by predators, and waterborne diseases.^{31F^{xxxii}} Although Bangladesh banned the practice of wild fry catching in 2006, the ban has proven to be ineffective as thousands of children, women, and other vulnerable workers still engage in the practice. Fry catchers are considered the most vulnerable actors in the shrimp industry, with some lacking permanent shelter, some being landless, and often indebted.^{32F^{xxxiii},33F^{xxxiv}} Wild fry is in higher demand than hatchery grown fry and fetches a higher price and therefore wild fry collection remains prevalent. However, now the practice is illegal it carries an increased risk of corruption, coercion, and extortion.^{34F^{xxxv}} Eradicating child labor in the wild fry catching sector is not prioritized as the activity is not officially considered hazardous, is sometimes overlooked as part of the formal shrimp supply chain, and the number of children employed in it are low compared to other sectors.^{35F^{xxxvi}} But, there are some recent news articles indicating the need to set up public-private initiatives to address this.^{36F^{xxxvii}}

Most wild fry collection and shrimp production takes place in rural areas where there are limited options for livelihood diversification and where it is common for children to be engaged in farm work with their parents. The seasonality of shrimp production, including fry catching, shrimp farming, and processing, drives the risk of debt bondage and is linked to a high presence of

contract labor arrangements, the latter of which is especially well documented in the processing industry. Most processing workers, who are predominantly female, are deprived of labor benefits that permanent contracts would provide. There are reports, albeit somewhat outdated, linking shrimp processing to underpayment and delay of payment, sexual abuse and harassment, excessive working hours and overtime, and hazardous working conditions.^{37F^{xxxviii}, 38F^{xxxix}} Combined, this evidence indicates that shrimp processing workers are vulnerable to forced labor. Restrictions on workers' ability to form labor or trade unions and the risk of job termination when expressing grievances, limit mechanisms for workers to address exploitative conditions.

The Bangladesh shrimp supply chain is long and complex with low levels of vertical integration and high levels of informality. The low productivity of shrimp farms means that many producers are needed to generate adequate volumes to supply processing plants. The involvement of many producers, in combination with multiple supply chain routes and shrimp product changing ownership several times, means that product traceability is nearly impossible. As a result, it is difficult to establish in individual supply chains whether and where forced labor, human trafficking, and hazardous child labor has occurred and to what extent.

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

Country-level indicators

- Human trafficking, forced labor, and hazardous child labor occurs in several industries in Bangladesh, including agriculture, garments and textiles, and manufacturing, among others.

Seafood industry-level Indicators

- Bangladesh's seafood industry has been linked within the past five years to human trafficking, forced labor, and hazardous child labor, including in fishing, aquaculture, and processing.

Aquaculture indicators

- There is evidence of human trafficking and forced labor on Bangladeshi shrimp farms: according to the 2022 Trafficking in Persons Report, traffickers use coercive debts to force Bangladeshi families and Indian migrants to work in shrimp farming.
- In addition, multiple indicators of forced labor have been identified in shrimp fry catching and shrimp farming in Bangladesh, including debt bondage, sexual violence, abuse and harassment, withholding of wages, excessive overtime, and hazardous working conditions. For farm workers, additional indicators included limited freedom

of movement and communication, and threats of dismissal or exclusion from future employment.

- There is also evidence linking shrimp aquaculture to hazardous child labor in wild fry catching, where hazards include risk of waterborne diseases due to long periods spent standing in water, predator attacks, and drowning.

Processing indicators

- There is evidence that human traffickers exploit adults and children in forced labor in shrimp processing.
- Investigations by non-governmental organizations found evidence of forced labor in shrimp processing in the form of excessive working hours without rest, involuntary overtime, late and underpayment of wages, hazardous working conditions, sexual violence, and abuse and harassment. Further reports indicate that women face violence and sexual abuse and unequal pay.
- Reports indicate that the use of child labor in shrimp processing has decreased significantly over the past decade, however, evidence suggests that children as young as 14 years are still engaged as contract or temporary workers in shrimp processing factories and informal pre-processing work although it is not clear whether this work constitutes (hazardous) child 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

- Poor living standards and household poverty in combination with costs associated with education (such as stationary, uniforms, notebooks) increase the risk of children getting involved in child labor.
- Bangladesh has a significant rural population where children working with their parents is more prevalent and culturally accepted, which can extend into what could be considered child labor or hazardous child labor.
- Bangladesh hosts a large population of Rohingya refugees who are especially vulnerable to exploitation. They are prevented from working legally and their movement is restricted. Access to education for Rohingya children remains limited.
- Bangladesh performs poorly against the indices for governance and corruption.

- Respect for workers' rights is poor, with Bangladesh ranked as one of the ten worst countries in the world for workers by the Global Rights Index.
- Lack of legal provisions and oversight to protect vulnerable workers like migrants and refugees.
- Official complicity in human trafficking and trafficking-related corruption hinders law enforcement. Political connections enable some traffickers to operate with impunity.
- Authorities sometimes penalize potential trafficking victims for offenses such as commercial sex or failing to carry a passport without screening for trafficking indicators.

Seafood industry-level indicators

- Most workers in the seafood industry are employed in the informal sector, which is not covered by the Bangladesh Labor Act.
- Limited information was found about access to seafood workplaces for third-party monitors.
- No recent evidence was found regarding worker access to grievance mechanisms in the seafood industry but a 2009 survey of workers in the shrimp sector found that workers were reluctant to express grievances due to fear of dismissal or exclusion from future work.
- Although some evidence was found of the presence of trade unions in the seafood industry, access to trade unions is restricted in general and impeded by anti-union discrimination.

Aquaculture indicators

- Wild shrimp fry catching is banned and is not considered a formal part of the shrimp supply chain, hence there is limited oversight and weak enforcement of the law.
- Seasonality of fry catching and farming work increases the risk of debt bondage as workers may take out loans from intermediaries during the low season to survive.
- Fry catching is not formally recognized as hazardous work and is therefore not considered a priority area to be addressed by the government.
- Wild shrimp fry is in high demand and preferred over hatchery fry, hence many people remain engaged in this practice.
- A lack of alternative livelihoods means that shrimp farm workers are less likely to report grievances for fear of dismissal since they depend on the work to support their families.
- Household poverty, indebtedness of family, and economic shocks are reasons why children have been forced to take up work along with their family in wild fry catching, shrimp farming or other areas of the shrimp supply chain.
- There is a social and cultural acceptance of children working in the agriculture sector, including the shrimp sector, and subsequently a lack of adequate social protection services and awareness about the long-term effects of child labor.

- The independent nature and availability of work, and desire to earn money for personal wishes have been listed as reasons for child labor in shrimp supply chain.
- Children are a cheaper workforce and more vulnerable to exploitation.
- Gender-based wage gaps have been observed in fry catching and shrimp farming.

Processing indicators

- Most processing workers work on a contract basis due to the seasonality of the work and are hired indirectly through labor contractors, meaning they are not afforded the same benefits and making them particularly vulnerable to labor exploitation.
- A lack of alternative livelihoods means that shrimp processing workers are less likely to report grievances for fear of dismissal since they depend on the work to support their families.
- The shrimp supply chain is characterized by complex supply chain linkages and many actors.
- Work in the intermediary stages between farming and processing plants (collection, trade, and pre-processing at *arats* (*wholesale markets*) and depots) is not considered hazardous and the number of children involved is thought to be small, therefore these stages are not prioritized for inspection.

Factors that decrease the likelihood

Country-level indicators

- Bangladesh has made significant progress in reducing its national poverty rate since the 1990's and shows progress against development indicators for income, health, and education.
- Bangladesh is a source country rather than a destination country for foreign migrant workers, who represent a more vulnerable part of the global workforce.
- Recent ratification of the Minimum Age Convention (C138) and the Protocol of 2014 to the Forced Labour Convention (P029) in 2022.
- Increased efforts by the government to eliminate human trafficking, including an increase in trafficking-related investigations, prosecutions, and convictions.
- There have been positive developments in the textile sector to improve collective bargaining and working conditions.

Seafood industry-level indicators

- Local initiatives with industry actors are present.
- Third-party certification schemes for farmed seafood are present in Bangladesh, with a small number of shrimp farms and processors having achieved certification to date.

Aquaculture indicators

- Most workers in fry collecting and shrimp farming appear to be Bangladeshi people that are local or internally migrant from other districts.

Processing indicators

- Most processing workers are Bangladeshi nationals from the local area or other sub-districts or nearby districts.
- Shrimp is predominantly produced for export, offering a point of leverage for buyers to drive improvement efforts.

Aquaculture

Over 17 million people are directly or indirectly involved in the Bangladeshi seafood industry including capture fisheries, of which 1.4 million people are women.^{39F^{xi}} Government and international aid and development agencies have encouraged the growth of the shrimp industry over the years to provide both a food source and income for poor rural communities.^{40F^{xli}} Reports on the number of people involved in shrimp aquaculture differ significantly, with one report stating that over 600,000 people are employed directly in shrimp aquaculture, which supports an additional 3.5 million people with side activities.^{41F^{xlii}} Other studies indicate involvement of 8.5 million people in the overall sector.^{42F^{xliii}}

Shrimp is almost entirely produced in larger sized former rice fields (locally known as *ghers*) using traditional and extensive production methods, both monoculture and polyculture with fish. Shrimp production is characterized by low lying ponds, low stocking densities, with generally no use of feed and fertilizer inputs and overall poor water quality management.^{43F^{xliv}} There are estimated to be 300,000 shrimp farmers in Bangladesh.^{44F^{xlv}} Estimates of farm sizes vary. One source reports a range from about 4.5 hectares (ha) for small-scale farms to 135 ha for the larger-scale farms.^{45F^{xlvi}} Another source estimates that more than half of the shrimp farms are smaller than a hectare and that 75% of shrimp farms in Bangladesh are small.^{46F^{xlvii}} The Bangladesh Department of Fisheries is also supporting the expansion of (semi-)intensive shrimp farms as part of the Shrimp National Action Plan and the World Bank loan program to increase the cultivation area under semi-intensive production to 10,500 ha by 2030.^{47F^{xlviii}} Currently around 5% of shrimp production comes from semi-intensive systems.^{48F^{xlix}} Around 830 ha of land is used for semi-intensive shrimp production in Southwest Bangladesh, with 40 ha are in Bagerhat, 540 ha in Khulna and 250 ha in Satkira.^{49Fⁱ}

According to the Yearbook of Fishery Statistics Bangladesh, an estimated area of 262,980 ha is used for shrimp and prawn culture in 2021-2022 and 84% of total shrimp and prawn production

volume is produced in the Khulna division. Giant tiger shrimp (*Peneaus monodon*), locally known as *Bagda*, represents 51% of total shrimp production, and giant river prawn (*Macrobrachium rosenbergii*), locally known as *Golda* or *Galda* represents 40% of total shrimp production.^{50F^{li}} Both species are mostly cultivated in the months of May/June to September/October.^{51F^{liii}},^{52F^{liii}} The remaining 9% constitutes other shrimp species including speckled shrimp (*Metapeneaus monoceros*) locally known as *Harina*, and Indian prawn (*Fenneropenaeus indicus*) locally known as *Chaka*.^{53F^{liv}}

Giant tiger shrimp is cultured in southern coastal districts for its dependency on brackish water. Its production covers an area of about 191,057 ha. It is predominantly cultured in the districts Satkhira, Bagerhat, and Khulna, which are the most southwestern coastal districts in Bangladesh. These three districts constitute 75% of total giant tiger shrimp production area and are responsible for around 77% of the country's total giant tiger shrimp production volume. In 2021-2022, total production reached 70,2187 Metric tonnes (Mt).^{54F^{lv}} Giant tiger shrimp is more commonly grown at approximately 270,000 shrimp farms^{55F^{lvi}}, but yields are low. Based on the figures provided in the Yearbook of Fishery Statistics the average annual productivity is 368 kilograms per hectare (kg/ha), although other sources report a much lower yield of around 120-150 kg/ha, or a yield up to 300 kg/ha when biosecurity is maintained, and shrimp are fed.^{56F^{lvii}} Giant river prawn has a production area of 71,923 ha. Bagerhat, Khulna, and Jessore are the main production districts, representing 76% of the total production area and are responsible for around 74% of total production volume.^{57F^{lviii}} As giant river prawn is a freshwater species, it is cultured in the more central parts of the districts using freshwater systems. In 2021-2022, 54,354 Mt of giant river prawn was produced. The exact number of prawn farmers involved in giant river prawn production is unknown, but with an average productivity of 756 kg/ha the productivity is about twice as high compared to giant tiger shrimp.^{58F^{lix}}

Shrimp fry used for production are sourced either through wild capture or hatcheries. The Bangladesh Shrimp and Fish Foundation reports that there are 92 shrimp hatcheries in Bangladesh^{59F^{lix}}, although not all are active and the number operating at one time depends on the season and demand. The Yearbook of Fishery Statistics Bangladesh reports that 39 prawn and 50 shrimp hatcheries were operational in 2021-2022.^{60F^{lxi}} According to a 2022 Financial Express article, currently 52 shrimp and 25 prawn hatcheries are active.^{61F^{lxii}} Current information on the location of hatcheries was not found but a 2006 article states that most hatcheries are located along the high salinity coast of Cox's Bazaar.^{62F^{lxiii}} Only three shrimp hatcheries produce Specific Pathogen-Free (SPF) post-larvae (PL) using imported SPF brood stock and SPF parent post larvae (PPL).^{63F^{lxiv}} The Bangladeshi government reinstated their earlier imposed ban on wild shrimp fry catching in 2006 to address the environmental impact of this practice and to promote hatchery production.^{64F^{lxv}} However, it has been reported that shrimp farmers in Southwest Bangladesh prefer to use wild-caught shrimp fry because there are few local hatcheries and wild fry are considered more resilient, have better survival rates, and are of higher quality than hatchery fry. As

such, wild fry is also more expensive than hatchery fry. Because of this, hatchery fry is more commonly bought by small scale farmers.^{65F^{lxvi},66F^{lxvii}} Wild fry catching and catchers, however, are sometimes overlooked as part of the formal supply chain.^{67F^{lxviii}} Since 2020 the Bangladeshi government has allowed a limited number of hatcheries to cultivate whiteleg shrimp (*Litopenaeus vannamei*) and approved commercial cultivation of the species on 29th of March 2023.^{68F^{lxix},69F^{lxx}}

The shrimp supply chain is characterized by high complexity and low levels of vertical integration. There are many supply chain actors operating at various levels and activities. On the production level, this includes hatcheries, fry and broodstock fishing, fry trading through fry *faria's* (small scale fry traders or intermediaries), fry *aratdars* (large scale fry traders or intermediaries) and fry commission agents (*bepari*), as well as private nurseries and ultimately shrimp farms.^{70F^{lxxi}}

Processing and Trade

Due to the small volumes produced by individual farms, product ownership changes many times after harvest. While formal processing takes place in the processing plant, there are several stages in the supply chain where forms of pre-processing can occur. These include individual people's households, shrimp *faria's* (small scale shrimp traders or intermediaries), shrimp *aratdar* (large scale fry traders or intermediaries), and depots and commission agents (*bepari*). Shrimp ultimately end up with suppliers/commission agents that work for processing plants or processing plants that export themselves or use an exporting company (that doesn't process).^{71F^{lxxii}}

Shrimp products constitutes around 70% of Bangladesh's total agricultural exports and is the country's second largest export product after textiles.^{72F^{lxxiii}} The majority of workers in shrimp processing are women.^{73F^{lxxiv}} According to the 2016 International Trade Union Confederation (IUTC) report, there are 146 seafood processing plants located in Bangladesh, although the number that is operational at any one time is dependent on supply and demand.^{74F^{lxxv}} A more recent online news article states that of 105 shrimp processing companies, only 30 to 35 were currently operational and exporting.^{75F^{lxxvi}} The EU Information Management System for Official Controls lists 76 seafood processing plants with an EU export approval in August 2022.^{76F^{lxxvii}}

Both giant tiger shrimp and giant river prawn are predominantly grown for export. According to the Yearbook of Fishery Statistics Bangladesh in 2021-2022, 21,403 Mt giant tiger shrimp, 5,772 Mt giant river prawn Mt, and 3,395 Mt of other shrimp species were exported, with giant tiger shrimp exports worth a reported value of US\$233.5 million.^{77F^{lxxviii}} In 2019, around 75% of giant tiger shrimp exports were sent to the EU, with the Netherlands, Belgium, and Germany accounting for 50% of the total Bangladesh exports.^{78F^{lxxix}} In the same year, around US\$15 million was exported to the United States, but this increased to US\$40 million in 2021.^{79F^{lxxx}}

The long and fragmented supply chain is one of Bangladesh's major challenges. Lack of proper product handling and cold chain, and time between harvest to formal processing reduces product quality, which may make it ineligible for Head-On Shell-On (HOSO) and Headless Shell-On (HLSO) products. While significant investments have been made to improve the supply chain and product quality, the current market perception in combination with lack of a coordinated marketing campaign, as well as an absence of market leaders, keeps Bangladesh extremely dependent on peeled giant tiger shrimp product.^{80F^{lxxx}i}

Due Diligence for Warmwater shrimp in Bangladesh

Important Country-Specific Considerations

- Bangladesh is primarily a source country for foreign migrant workers rather than a destination country, but internal migration is increasing, and Bangladesh has received large numbers of vulnerable Rohingya refugees from Myanmar since 2017.
- Gaps in labor legislation mean that vulnerable workers including children, foreign migrants and refugees, and other workers in the informal sector, are not adequately protected. Child labor laws do not align with international standards regarding the minimum age of work, nor do they include all known hazardous occupations.

Suggested Due Diligence Priorities & Questions

Company and Supplier Policies

The Bangladesh shrimp supply chain is long and complex, with limited oversight of wild fry collection and pre-processing stages, and limited traceability overall.

1. Has the company conducted a supply chain mapping exercise for their supply chain (aquaculture) to identify possible critical areas where forced labor, human trafficking and hazardous child labor can occur?
 - a. Does the exercise consider all supply chain stages (formal and informal, such as wild fry catching, port/transportation, pre- and formal processing)?
 - b. Does the exercise identify possible strategies and preventative actions that could be taken to reduce the prevalence of forced labor, human trafficking, and hazardous child labor through company actions?
2. Are suppliers required to conduct a risk assessment of their supply chains in relation to forced labor, human trafficking, and hazardous child labor?
3. Does the company know where processing companies/suppliers are sourcing their shrimp inputs? Is there traceability back to the farm and their fry origin? Does the company know what working conditions are like on the farm?
4. Do processing companies have conditions / agreements with raw material suppliers on topics like:
 - a. only sourcing raw material from registered aquaculture operations?
 - b. only sourcing raw material from hatchery grown PL?
5. In situations where suppliers' product traceability is likely to be obscure or cannot be guaranteed, does the company provide mechanisms to enable

suppliers to have more control / insight over their supply chain? Are implementing these mechanisms a prerequisite for supplier approval?

Aquaculture production

Gaps in child labor laws affect informal shrimp production meaning there is limited oversight, with risks heightened by a general cultural acceptance of children working and a lack of clarity among farmers and government officials about what constitutes child labor on family farms.

1. Does the company require a remediation strategy from its suppliers in case child labor is found at the production level?
 - a. Is this requirement formalized as part of the contract agreement with your suppliers?
 - b. Are the verification plan and data requirements of the remediation strategy established in consultation with the supplier and possibly raw material providers?
 - c. Does the company monitor effective implementation of the remediation strategy?
2. In cases where raw material is sourced from family run operations, does the company and/or its suppliers engage in any project or activity to support education for farmer's children?

Contracts and compensation

Most shrimp processing workers are hired as contract workers rather than permanent workers due to the seasonal nature of production and are hired informally by labor contractors. These contractors often control workers' wages to the workers' disadvantage, with evidence of wages paid below the legal minimum wage and underpayment of wages using an unfair piece-rate system.

1. What is the proportion of temporary and contract workers versus permanent workers in shrimp processing?

2. Are processing workers employed using a formal contract written in a language that they understand?
 - a. Is the content of the contract explained to them in a language that they can understand?
 - b. Can workers demonstrate an understanding of the content and conditions of the contract?
3. Do you know if processing workers in your supply chain are paid at least the national minimum wage?
4. Do you know how processing workers are paid? What payment structure is used to compensate them (e.g., piece rate, fixed monthly salary)?

Complaint's mechanisms

Mechanisms for workers to address grievances may be limited. In general, access to trade unions in Bangladesh is restricted and is hindered by anti-union discrimination. Evidence from a 2009 survey of workers in the shrimp sector found that workers were reluctant to express grievances due to fear of dismissal or exclusion from future work, exacerbated by a lack of alternative livelihoods for shrimp farm workers who are therefore less likely to report grievances since they depend on the work to support their families.

1. Do workers in your operation/supply chain have access to third party monitors such as trade union representatives?
2. Do workers in your operation/supply chain have access to a complaint mechanism?
3. Are there procedures to document, track, and resolve workplace complaints?

Bangladesh: Country-level indicators

Indicator	Description	Sources
Poverty levels in a country	<p>Human Development Index</p> <p>HDI Value (2021): 0.661</p> <p>HDI Rank (2021): 129</p> <p>Bangladesh’s HDI value for 2021 places it in the ‘medium human development’ category and positions it at 129th out of 191 countries and territories. Bangladesh’s HDI value for 2021 is above the average of 0.636 for countries in the medium human development group and above the average of 0.632 for countries in South Asia.</p> <p>Bangladesh shows progress against each of the HDI indicators for income, health, and education from 1990 to 2021. However, when Bangladesh’s HDI value is discounted for inequality, it falls to 0.503, a loss of 23.9% due to inequality in the distribution of the HDI dimension indices. The average loss due to inequality for medium HDI countries is 24.4% and for South Asia it is 24.7%.</p>	<p>UNDP Human Development Index (HDI)</p> <p>UNDP Global Human Development Indicators Country Profile: Bangladesh</p>
	<p>Poverty headcount ratio at national poverty line (% of population): 24.3% (2016), showing a decline over the past six years from 31.5% (2010).</p> <p>The poverty headcount ratio is higher than neighboring countries India, China, and Bhutan, and lower than neighboring countries Nepal and Myanmar:</p> <ul style="list-style-type: none"> • India (2011) 21.9% • China (2020) 0% • Bhutan (2017) 8.2% • Nepal (2010) 25.2% • Myanmar (2017) 24.8% 	<p>World Bank</p>

Indicator	Description	Sources
	<p>Global Hunger Index (2022): 19.6</p> <p>Bangladesh ranks 84th out of 121 qualifying countries. With a score of 19.6 out of 100, Bangladesh suffers from a level of hunger that is ‘moderate’.</p> <p>Bangladesh performs better than neighboring country India, and worse than China and Myanmar, while sharing a similar score to Nepal. Bhutan was not rated:</p> <ul style="list-style-type: none"> • India: 29.1 • China: <5 • Myanmar: 15.6 • Nepal: 19.1 • Bhutan: not assessed. <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>	<p>Global Hunger Index (GHI)</p>
<p>Country’s position in the regional economic power system</p>	<p>Comparing HDI ranking to other countries in the region</p> <p>Bangladesh</p> <ul style="list-style-type: none"> • HDI Value (2021): 0.661 • HDI Rank (2021): 129 (medium human development) <p>Neighboring Countries:</p> <p>India HDI Value (2021): 0.633 HDI Rank (2021): 132</p> <p>Nepal HDI Value (2021): 0.602 HDI Rank (2021): 143</p> <p>China</p>	<p>UNDP Human Development Index (HDI)</p> <p>UNDP Global Human Development Indicators Country Profile: Bangladesh</p>

Indicator	Description	Sources
	<p>HDI Value (2021): 0.768 HDI Rank (2021): 79</p> <p>Myanmar HDI Value (2021): 0.585 HDI Rank (2021): 149</p> <p>Bhutan HDI Value (2021): 0.666 HDI Rank (2021): 127</p>	
	<p>Comparing its recent economic growth to the general economic growth rates in the region</p> <p>Bangladesh's GDP growth is higher than that of its neighboring countries India, Nepal, China, Myanmar, and Bhutan.</p> <p>Bangladesh GDP Growth (annual %): 7.1 (2022)</p> <p>Neighboring countries:</p> <p>India GDP Growth (annual %): 7.0 (2022)</p> <p>Nepal GDP Growth (annual %): 5.6 (2022)</p> <p>China GDP Growth (annual %): 3.0 (2022)</p> <p>Myanmar GDP Growth (annual %): 3 (2022)</p> <p>Bhutan GDP Growth (annual %): 4.1 (2021)</p>	<p>World Bank Databank figures on annual economic growth</p>

Indicator	Description	Sources
	<p>Migration data</p> <p>Net migration rate (immigrants minus emigrants per 1,000 population) for Bangladesh is -1 (2021)</p> <p>Migration inflows (Year): not available</p>	<p>IOM Migration Data Portal.</p>
	<p>Regional migration trends and patterns</p> <p>Bangladesh is primarily a source country for migrants. Of the total population, 4.5% of people are living and working abroad all throughout Europe and especially in the Gulf Cooperation Council (GCC) region, which includes countries such as Saudi Arabia, Oman, Qatar, Malaysia, Kuwait, Singapore, Bahrain, and Jordan. A significant number of migrant workers are living in other countries around Europe and the Southern Asia region. Migration Policy Institute, October 2017</p> <p>Bangladesh's economy relies on wages sent home from workers abroad, consisting of around 8% of the country's GDP. The government relies on trading human capital as an economic strategy, the most well-off people in the rural areas had at least one person working abroad and sending money back to their family in Bangladesh. Migration Policy Institute, October 2017</p> <p>According to estimates from the United Nations' Population Division, Bangladesh has one of the largest emigrant populations at 8 million individuals. Their income overseas has been a major contributor to Bangladesh's overall growth. However, due to the COVID-19 pandemic, many of these emigrants have suddenly lost their income, sending the country once more into poverty. Migration Policy Institute, July 2020</p>	<p>IOM Migration Data Portal</p> <p>Migration Policy Institute, October 2017, 'Chasing the Dubai Dream in Italy: Bangladeshi Migration to Europe'</p> <p>Migration Policy Institute, December 2017, 'Surge in Violence Against Myanmar's Rohingya Spurs World's Fastest-Growing Refugee Crisis'</p> <p>Migration Policy Institute, 2020, 'COVID -19 Pandemic Profoundly Affects Bangladeshi Workers Abroad with Consequences for Origin Communities'</p>

Indicator	Description	Sources
	<p>While not a significant destination for foreign migrant workers, Bangladesh has received large numbers of vulnerable refugees. Myanmar Rohingya Muslim refugees fleeing from the army travel to Bangladesh and Thailand. In 2017, there were more than a recorded 630,000 Rohingya refugees fleeing Myanmar to Bangladesh, which raised concerns on their ability to handle the uptick in population. Migration Policy Institute, December 2017</p> <p>In 2021, a military coup took place in Myanmar, and the impact on the Rohingya refugees has yet to be determined in their home country. Bangladesh's efforts to repatriate the refugees have been met with reluctance on the part of the refugees who are anxious about returning to Myanmar. Instead, thousands of Rohingya have been detained on a remote island in the Bay of Bengal, with reports of cruel and inhuman treatment. Further thousands of people are crowded into refugee camps around Cox's Bazar. Bangladesh is not party to the 1951 Refugee Convention and is therefore not equipped to protect the refugees. Migration Policy Institute, March 2021</p> <p>Internal migration from rural to urban areas has also increased in response to less demand for farm labor and more need for workers in urban areas. Workers are targets for recruitment agents. Migration Policy Institute, October 2017</p>	<p>Migration Policy Institute, March 2021, 'Stateless and Persecuted: What Next for the Rohingya?'</p>
	<p>Known human trafficking routes</p> <p>The Freedom Collaborative Victim Journeys Map identifies trafficking routes from Bangladesh to Malaysia, India, Thailand, Kyrgyzstan, and Indonesia, and within Bangladesh. In addition, there are routes from Myanmar and Nepal, with 41.2% reported to end</p>	<p>Freedom Collaborative, No date, Victim Journeys Map</p> <p>US Department of State, 2023, 2023 Trafficking in</p>

Indicator	Description	Sources
	<p>up in the Agriculture/Forestry/Fishing sector. Freedom Collaborative, No date</p> <p>The US Department of State’s 2023 Trafficking in Persons (TIP) Report identifies the Middle East, particularly Saudi Arabia, Southern and East Africa, South and Southeast Asia, Europe and the United States as destinations for trafficked Bangladeshi workers. Additionally, the report notes that Bangladesh is a destination for Rohingya refugees from Myanmar. The report also states that Bangladesh is the world’s sixth largest migrant-sending country and the world’s eighth largest receiving country. US Department of State, 2023</p>	<p>Persons (TIP) Report</p>
<p>Governance practices and systems in a country (measured through indexes)</p>	<p>WGI (2021) Percentile Rank:</p> <ul style="list-style-type: none"> • Voice and Accountability: 28.02 • Political Stability and Absence of Violence: 16.04 • Government Effectiveness: 28.85 • Regulatory Quality: 20.67 • Rule of Law: 28.85 • Control of Corruption: 18.27 <p>Bangladesh ranks in the lower percentiles for all six indicators. Bangladesh ranks closely to the regional average for South Asia except in ‘Control of Corruption’, which it ranks lower.</p> <p>Note: Percentile rank among all countries ranges from 0 (lowest) to 100 (highest) rank, where the higher the score, the better the governance.</p>	<p>World Governance Indicators (WGI)</p>
	<p>Corruption Perception Index (2022):</p> <p>Score: 25/100</p> <p>Rank: 147/180 countries</p>	<p>Transparency International Corruption Perception Index (CPI)</p>

Indicator	Description	Sources
	<p>More than two-thirds of countries score below 50 on this year's CPI, with an average score of just 43. Bangladesh's score of 25 places it below the average and positions it 147th out of 180 countries and territories. Bangladesh scores worse than all neighboring countries except for Myanmar which is ranked at 157. Bangladesh scores less than the regional average for the Asia Pacific.</p> <p>Note: Based on 0 = Highly Corrupt, 100 = Very Clean.</p>	
	<p>Basel Anti-Money Laundering Index (2022):</p> <p>Rank: 41/128 countries</p> <p>Overall score: 5.75/10</p> <p>Bangladesh performs better in the Basel AML index than all assessed neighboring countries.</p> <p>Neighboring countries</p> <ul style="list-style-type: none"> • India: not assessed in 2021. • Nepal: not assessed in 2021. • China: 6.69 • Myanmar: 7.78 • Bhutan: 6.15 <p>Note: Ranking is out of [total] countries; top possible score is 0 (low risk,), lowest score is 10 (high risk).</p>	<p>Basel Anti-Money Laundering (AML) Index</p>
	<p>Global Rights Index (2023):</p> <p>Rating: 5 (No guarantee of rights)</p> <p>The ITUC's 2023 Global Rights Index ranks Bangladesh among the ten worst countries for workers in the world and places the country below the regional average ranking of 4.18 for the Asia-Pacific region, which is rated as the second worst region in the world for workers, behind the Middle</p>	<p>International Trade Union Conference (ITUC) Global Rights Index (GRI)</p> <p>ITUC Global Rights Index 2023 Report: Bangladesh</p>

Indicator	Description	Sources
	<p>East and North Africa. Bangladesh performs worse in the GRI than neighboring country Nepal, shares the same score with India and China, and performs better than Myanmar.</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>Education and general literacy levels in a country</p>	<p>Adult literacy rates, among the population aged 15 years and older (2020): 75%</p> <p>Adult female literacy rate (2020): 72%</p> <p>Adult male literacy rate (2020): 78%</p> <p>Comparison to neighboring countries:</p> <ul style="list-style-type: none"> • India (2018): 74% • Nepal (2021): 71% • China (2020): 97% • Myanmar (2019): 89% • Bhutan (2021): 71% 	<p>World Bank Open Data</p>
	<p>Primary school completion rates, total (% of relevant age group) (2021): 122%</p> <p>Primary completion rates, female (% of relevant age group) (2021): 125%</p> <p>Primary completion rates, male (% of relevant age group) (2021): 119%</p> <p>Comparison to neighboring countries:</p> <ul style="list-style-type: none"> • India (2021): 97% • Nepal (2022): 106% • China (2009): 98% • Myanmar (2018): 95% • Bhutan (2021): 90% 	<p>World Bank Open Data</p>

Indicator	Description	Sources
	<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>Lower secondary education completion rates, total (% of relevant age group) (2018): 88%</p> <p>Lower secondary completion rates, female (% of relevant age group) (2021): 87.8%</p> <p>Lower secondary completion rates, male (% of relevant age group) (2021): 84.0%</p> <p>Comparison to neighboring countries:</p> <ul style="list-style-type: none"> • India (2021): 85.8% • Nepal (2022): 102.8% • China (2011): 99.5% • Myanmar (2018): 64.8% • Bhutan (2021): 85.2% <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>World Bank Open Data</p>
	<p>School enrolment, tertiary (2021): 25% gross</p> <p>School enrolment, tertiary, female (2021): 23%</p> <p>School enrolment, tertiary, male (2021): 27%</p>	<p>World Bank Open Data</p>

Indicator	Description	Sources
	<p>Comparison to neighboring countries:</p> <ul style="list-style-type: none"> • India (2021): 31% • Nepal (2022): 17% • China (2021): 64% • Myanmar (2018): 19% • Bhutan (2021): 23% <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>Attitudes towards migrant workers in a country’s population</p>	<p>Migrant Acceptance Index score: 7.45/9</p> <p>Comparison to neighboring countries:</p> <ul style="list-style-type: none"> • India: 4.90/9 (2016), 4.01/9 (2020) • Nepal: 6.28/9 • China: 5.11/9 • Myanmar: 2.96/9 (2016), 4.00/9 (2020) • Bhutan: no data <p>Bangladesh’s score of 7.45 out of 9 indicates that people in Bangladesh are more accepting of migrants than on average for all countries assessed, with a world score of 5.29/9.</p> <p>Bangladesh’s score is also higher than that of nearby countries and higher than the average score for South Asia, which is 4.88/9.</p> <p>Note: Based on 138 countries surveyed in 2016; U.S. surveyed in 2017; top possible score is 9.0. The Index was updated in 2020. However, the publicly</p>	<p><u>Gallup Migrant Acceptance Index</u></p>

Indicator	Description	Sources
	accessible 2020 data do not include updates to Bangladesh's score.	
Legislation and regulation to protect migrant workers	<p>Coverage of legal provisions under the labor laws</p> <p>Bangladesh ratified the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families in 2011. UN Treaty Body Database</p> <p>The country's first report to the Committee on the Protection of the Rights of All Migrant Workers and Members of Their Families on the measures taken to implement the Convention, due in 2012, was submitted in 2015. Since, Bangladesh is predominantly a country of origin for migrants, the report notes that legal provisions relating to migrant workers are focused on those from Bangladesh and working overseas rather than protection for migrant workers residing in Bangladesh. Committee on the Protection of the Rights of All Migrant Workers and Members of Their Families, 29 February 2016</p> <p>As Bangladesh is increasingly becoming a destination and transit country for migrants, more efforts are needed to ensure the protection of foreign migrant workers in Bangladesh. Committee on the Protection of the Rights of All Migrant Workers and Members of Their Families, 22 May 2017</p>	<p>UN Treaty Body Database</p> <p>Committee on the Protection of the Rights of All Migrant Workers and Members of Their Families, 29 February 2016, Consideration of reports submitted by States parties under article 73 of the Convention, Initial reports of States parties due in 2012 Bangladesh, CMW/C/BGD/1</p> <p>Committee on the Protection of the Rights of All Migrant Workers and Members of Their Families, 22 May 2017, Concluding observations on the initial report of Bangladesh, CMW/C/BGD/CO/1</p>
	Access to social protection, health, and education	US Department of State, 2023, 2023 Trafficking in

Indicator	Description	Sources
	<p>Bangladesh registers Rohingya refugees and allows for outside aid for them from international organizations. However, there is restriction on movement for non-legal residents and there are no established legal reporting mechanisms within refugee camps, which impedes access to formal criminal justice systems and social services. The Bangladeshi government continues to deny access to schooling and legal employment This has increased their vulnerability to being trafficked. US Department of State, 2023</p>	<p>Persons (TIP) Report</p>
	<p>Bilateral MOUs or other agreements specifically designed to protect migrant workers</p> <p>Bangladesh has a bilateral agreement with many of their destination countries such as Saudi Arabia, Oman, Qatar, Malaysia, Kuwait, Singapore, Bahrain, Jordan and other countries around Europe and the Southern Asia region, but those countries have not ratified the Convention. UN OHCHR, 04 April 2017</p>	<p>UN Office of the High Commissioner for Human Rights (OCHR), 04 April 2017, 'Committee on the Protection of the Rights of Migrant Workers considers initial report of Bangladesh'</p>
<p>Ratification of relevant international conventions and domestication of conventions into a national legal framework (Forced labor, human trafficking, and hazardous child labor)</p>	<p>Convention No. 29 - In Force</p>	<p>Forced Labour Convention, 1930 (No. 29)</p>

Indicator	Description	Sources
	Convention No. 105 - In Force	<u>Abolition of Forced Labour Convention, 1957 (No. 105)</u>
	Convention No. 138 – Ratified, entered into force for Bangladesh on 22 Mar 2023.	<u>Minimum Age Convention, 1973 (No. 138)</u>
	Convention No. 182 - In Force	<u>Worst Forms of Child Labour Convention, 1999 (No. 182)</u>
	Protocol 29 - In Force	<u>Protocol of 2014 to the Forced Labour Convention, 1930 (P29)</u>
	Palermo Protocol - Ratified	<u>Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime (the ‘Palermo Protocol’)</u>
	Convention No. 188 – Not Ratified	<u>ILO Convention 188 on Work in Fishing;</u>
	PSMA – Party to the PSMA	<u>The FAO Port State Measures Agreement (PSMA)</u>

Indicator	Description	Sources
	<p>Domestication into national legislation</p> <p>The law prohibits all forms of forced or compulsory labor.</p> <p>The minimum age for work is set at 14 years and the minimum age for hazardous work is 18 years. US Department of State, 2022</p> <p>In 2012, Bangladesh implemented the Prevention and Suppression of Human Trafficking Act (PSHTA) which criminalized sex and labor trafficking. Penalties include imprisonment for five years to life and a minimum fine of no less than 50,000 Bangladeshi Taka (US\$ 476). Bonded labor crimes are treated separately and comes with lesser penalties such as a five to twelve years prison sentence and a minimum fine of no less than 50,000 Bangladeshi Taka (US\$ 476). US Department of State, 2023</p>	<p>US Department of State, 2022, 2022 Country Reports on Human Rights Practices: Bangladesh</p> <p>US Department of State, 2023, 2023 Trafficking in Persons (TIP) Report: Bangladesh</p>
Regulation of recruitment	<p>Country’s government-sanctioned oversight mechanisms (regulations, accreditation schemes, inspection, etc.) of recruitment agents</p> <p>Bangladesh has not ratified the ILO convention ‘C181 - Private Employment Agencies Convention, 1997 (no.181)’, which provides for the regulation of recruitment through private employment agencies for all categories of workers except seafarers. ILO NORMLEX</p> <p>Bangladesh oversees legal recruitment agencies through The Bangladesh Association of International Recruiting Agencies (BAIRA). However, the Ministry of Foreign Affairs recognized the lack of a framework to regulate the deals.</p> <p>Bangladesh implemented the Overseas Employment and Migrants Act (OEMA) in 2013 that criminalized</p>	<p>ILO NORMLEX, Up-to-date Conventions and Protocols not ratified by Bangladesh</p> <p>US Department of State, 2023, 2023 Trafficking in Persons (TIP) Report</p>

Indicator	Description	Sources
	<p>recruitment practices such as fraudulent recruitment and exorbitant fees. The limit for those fees was set at a level that was still high enough to send migrant workers into debt and vulnerable to debt bondage, the equivalent of around \$810 to \$2,500. US Department of State, 2023</p>	
<p>Enforcement of legislation for forced labor, human trafficking, hazardous child labor, migrant worker protections, recruitment and working conditions</p>	<p>TIP Report</p> <p>The US Department of State’s 2023 Trafficking in Persons (TIP) Report assigns Bangladesh a Tier 2 Ranking, stating “The Government of Bangladesh does not fully meet the minimum standards for the elimination of trafficking but is making significant efforts to do so. The government demonstrated overall increasing efforts compared with the previous reporting period, considering the impact of the COVID-19 pandemic, if any, on its anti-trafficking capacity; therefore Bangladesh remained on Tier 2.”. Bangladesh has been assigned a Tier 2 ranking since 2020.</p> <p>The Bangladeshi government has overall made many improvements to their anti-trafficking system including increased trafficking investigations, prosecutions, and convictions, as well as increasing investigations of cases involving Rohingya victims, and lowering recruitment fees of government-run recruitment agencies. The government extended its national anti-trafficking action plan to 2025 and has released its first national report on human trafficking within the country. However, the government fell short in several key areas, including not addressing internal sex trafficking or official complicity, lack of accountability to sub-agents conducting illegal recruitment operations, insufficient victim protection efforts, and the majority of traffickers being sentenced to fines rather than imprisonment.</p>	<p>US Department of State, 2023, 2023 Trafficking in Persons (TIP) Report</p>

Indicator	Description	Sources
	<p>Some officials did not understand the difference between migrant smuggling and human trafficking, and some denied that internal trafficking existed even though child sex trafficking is well documented in the country.</p> <p>Official complicity in human trafficking and trafficking-related corruption is a serious concern that hinders law enforcement and has not been adequately addressed by the government. Allegations includes judges dismissing cases due to political pressure or to maintain case disposal rates, cases of law enforcement, cases of police allegedly requesting and accepting bribes that facilitate incidents of potential human trafficking and government official maintaining close connections to the lucrative foreign recruitment agencies. The Prevention and Suppression of Human Trafficking Act (PSHTA) offers victims the chance to testify over video calls during the pandemic as well as protection such as police security during their cases, however many victims still refuse the offer likely because of the poorly implemented protection. The government did offer free legal counsel and financial support to trafficking victims. US Department of State, 2023</p>	
	<p>Child labor laws</p> <p>The only authority able to file cases of child labor is the Department of Inspection for Factories and Establishments (DIFE). It has implemented a one-year action plan to eliminate hazardous child labor. However, staffing numbers are inadequate and this organization has no inspectors dedicated to child labor, nor do staff receive routine training on child labor. Furthermore, DIFE is not authorized to monitor the informal sector nor conduct unannounced inspections in export processing zones and is only</p>	<p>US Department of State, 2023, 2023 Trafficking in Persons (TIP) Report</p> <p>US Department of Labor, 2022, 2021 Findings on the Worst Forms of Child Labor: Bangladesh</p>

Indicator	Description	Sources
	<p>permitted to file cases with the labor courts and not the criminal courts. US Department of State, 2023</p> <p>As noted above, the number of labor inspectors is insufficient for Bangladesh’s working population. As of 2021, Bangladesh employed only 305 labor inspectors when the number should be closer to 1,745 inspectors for the size of the workforce. Due to the insufficient number of inspectors, a majority of industrial and commercial establishments are not inspected. In addition, routine unannounced audits are not used in all sectors, making it easier for employers to hide child laborers, for example, by moving them to night shifts. Nevertheless, the government reported the removal of over 5,000 children from vulnerable situations through labor inspections between July 2020 to June 2021. But data on its criminal law enforcement efforts related to child labor, including the number of investigations, prosecutions, and convictions, was not released. Penalties for using child labor are not sufficient to deter violations, with employers receiving a warning or minimal fines. There were reports, however, of two cases of abuses against child workers in 2021, one involving the death of child workers in a factory fire and the other involving alleged torture and confinement of child workers, in which the employers were arrested. US Department of Labor, 2022</p>	
	<p>Global Slavery Index (2023):</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</p>	<p>Global Slavery Index’s overall ratings</p>

Indicator	Description	Sources
	<p>example, supporting survivors to exit and remain out of modern slavery”.</p> <p>Est. no. of people living in modern slavery: 1,162,000</p> <p>Prevalence Index Rank: 7.1 per 1,000 people</p> <p>Vulnerability to Modern Slavery: 58/100</p> <p>Government Response Rating: 49/100</p> <p>Note: The GSI government responses to modern slavery is presented as a percentage. Higher percentage reflects more action being taken and a higher percentage on the GSI is assumed to mean lower risk by the SSRT.</p>	
	<p>Documentation from national labor inspection and other law enforcement agencies</p> <p>The government reported the removal of over 5,000 children from vulnerable situations through labor inspections between July 2020 to June 2021. But did not share data on its criminal law enforcement efforts related to child labor.</p>	<p>US Department of Labor, 2022, 2021 Findings on the Worst Forms of Child Labor: Bangladesh</p>
	<p>ILO</p> <p>The 2022 ILO Report on the Application of Conventions states that although the Bangladeshi government implemented more regulations to their existing anti-trafficking laws, and investigations were higher than in previous years, convictions were down in 2022. Out of 7,248 cases, 527 were investigated and 411 offenders were convicted.</p> <p>Refugees fleeing into Bangladesh are susceptible to forced labor and debt bondage, particularly in the garment industry. During the 2019 reporting period, there were 100 reported cases of Rohingya refugees</p>	<p>Report of the Committee of Experts on the Application of Conventions, 2022</p>

Indicator	Description	Sources
	<p>forced into labor. The Committee urged the Bangladeshi government to take a stronger stance in preventing refugees from being abused and exploited. Report of the Committee of Experts on the Application of Conventions, 2022</p>	
<p>Evidence of forced labor, human trafficking, and hazardous child labor in the country</p>	<p>General evidence from other sectors</p> <p>Bangladeshi workers who migrate to other countries through illegal and legal channels are exploited in forced labor. Many workers are subject to high recruitment fees.</p> <p>In addition, domestic and foreign victims are exploited by traffickers in forced labor and sex trafficking in Bangladesh. Rohingya refugees are especially vulnerable, being exploited at an unknown scale. They are recruited to work as shop hands, fishermen, rickshaw pullers and domestic workers in Bangladesh. There are reports of Bangladeshi fishermen exploiting Rohingya men in forced labor via debt-based coercion. US Department of State, 2023</p> <p>The US Department of Labor reports child labor in these industries; hand-rolled cigarettes, bricks, dried fish, footwear, steel furniture, garments, glass, leather, matches, poultry, salt, shrimp, soap, textiles, and jute. There is evidence of forced child labor and forced labor in the dried fish industry. US Department of Labor, 2022</p>	<p>US Department of State, 2023, 2023 Trafficking in Persons (TIP) Report</p> <p>US Department of Labor, 2022, 2021 Findings on the Worst Forms of Child Labor: Bangladesh</p>

Table 1: Bangladesh - Country-level indicators

Bangladesh: Seafood industry-level indicators

Indicator	Description	Sources
<p>Direct evidence of Forced labor, human trafficking, and hazardous child labor</p>	<p>There is evidence connecting Bangladesh’s seafood industry to forced labor, forced child labor, and hazardous child labor.</p> <p>According to the US Department of State’s 2023 Trafficking in Persons Report, Rohingya men are exploited in forced labor by Bangladeshi fishers using debt bondage as a means of coercion. Rohingya children are also recruited from camps into forced labor as fishers. In addition, debt-based coercion is reportedly used as a means by traffickers to exploit adults and children in forced labor in seafood processing (including fish and shrimp – see Processing indicators), and dried fish production. Among the evidence cited, the report states that “approximately 40,000 children are forced to work at dry fish processing units while their parents receive money advances against the children’s salaries”. The 2022 Trafficking in Persons Report also notes that children forced to work at dry fish processing plants can be made to work for nine months. US Department of State, 2023 , US Department of State, 2022</p> <p>Work in the dried fish industry is considered hazardous due to a lack of protective gear and exposure to chemicals, salt, and the sun. US Department of Labor, 2022</p>	<p>US Department of State, 2023, 2023 Trafficking in Persons (TIP) Report</p> <p>US Department of Labor, 2022, 2021 Findings on the Worst Forms of Child Labor: Bangladesh</p> <p>US Department of State, 2022, 2022 Trafficking in Persons Report</p>
<p>ILO indicators of forced labor and ILO R190 definition of hazardous child labor</p>	<p>Debt bondage is identified in shrimp farming (see Aquaculture indicators).</p>	<p>US Department of State, 2023, 2023 Trafficking in Persons (TIP) Report</p>

Indicator	Description	Sources
<p>Fishing, aquaculture and processing regulations and policies</p>	<p>Labor-related fishing legislation</p> <p>Limited information on labor-related legislation for the seafood industry was found. Notably, the Bangladesh Labor Act does not apply to the informal sector, which includes 95% of employment in 'Agriculture, forestry and fishing' according to the country's most recent Labour Force Survey (2016-2017). US Department of Labor, 2022 , Bangladesh Bureau of Statistics, January 2018</p> <p>The main fisheries authority in Bangladesh is the Department of Fisheries (DoF), which sits under the Ministry of Fisheries and Livestock (MoFL). The Department has responsibility for fisheries and aquaculture and its mandate includes, among other items, fisheries conservation and management, policy development, quality control measures and health certificates, and the facilitation of financial support and alternative income generation for seafood workers. Department of Fisheries, June 2022</p> <p>Relevant policies include the National Fisheries Policy, 1998. This includes goals related to poverty alleviation and improved socioeconomic conditions for fisher folk, nutrition, increased access to export markets as well as environmental-oriented goals. FAO Fisheries and Aquaculture Division, No date</p> <p>In addition, the National Shrimp Policy, 2014 includes socioeconomic goals related to health and nutrition, employment generation and poverty alleviation, and increased access to export markets. Shamsuzzaman et al., 2016</p> <p>Risk factors for modern slavery identified by the 2018 Global Slavery Index (GSI) for fishing relate to wealth and institutional capacity rather than policy - Bangladesh:</p>	<p>US Department of Labor, 2022, 2021 Findings on the Worst Forms of Child Labor: Bangladesh</p> <p>Bangladesh Bureau of Statistics, January 2018, Labour Force Survey Bangladesh 2016-2017</p> <p>Department of Fisheries, June 2022, 'About Department of Fisheries'</p> <p>FAO Fisheries and Aquaculture Division, No date, National Aquaculture Legislation Overview. Bangladesh</p> <p>Shamsuzzaman, Md. M., Xiangmin, X., and Islam, M., 2016, Legal status of Bangladesh fisheries: Issues and Responses. Indian Journal of Geo-Marine Sciences.</p>

Indicator	Description	Sources
	<ul style="list-style-type: none"> National Fisheries Policy (catch outside EEZ, distant water fishing, and subsidies) - Low Risk Wealth and Institutional Capacity (GDP per capita, value landed per fisher, and unreported landings) – High Risk <p>Global Slavery Index (GSI) 2018 - Fishing</p>	<p>Vol. 45 (11), pp. 1474-1480.</p> <p>Global Slavery Index (GSI) 2018 - Fishing</p>
Enforcement and implementation of industry-specific regulations and policies	<p>Unknown.</p> <p>There is limited public access to information on fisheries law enforcement in Bangladesh and no public access to information on the enforcement of labor standards in the fisheries sector or the use of sanctions for fisheries law or labor standard offences.</p>	<p>Fisheries Transparency Initiative, 2022, TAKING STOCK: Online Transparency of Fisheries Management Information, People's Republic of Bangladesh, 2021 Summary Assessment Report</p>
Access to workplaces for third-party monitors (trade union representatives, on-board observers, etc.)	<p>Information about access to seafood workplaces for third-party monitors is sparse but a third-party organization that works with independent unions is present. The Solidarity Center, an international workers' rights organization, states that it works with independent unions in the seafood processing sector to advance workers' rights.</p>	<p>Solidarity Center: Bangladesh</p>
Worker access to a functional grievance mechanism	<p>Limited evidence was found regarding worker access to grievance mechanisms in the seafood industry and is now more than 10 years' old so may not reflect the current situation. A 2009 survey of shrimp farm and processing workers in the districts of Satkhira, Khulna, and Bagerhat in Southwestern Bangladesh found that workers in the shrimp sector feared they</p>	<p>Verité, 2012, Research on Indicators of Forced Labor in the Supply Chain of Shrimp in Bangladesh</p>

Indicator	Description	Sources
	<p>would be dismissed or excluded from future work if they expressed grievances. No processing workers felt they had access to a viable grievance mechanism. Verité reports that “Workers rarely felt that they had any grievance mechanism or avenue for recourse.” Pg. 74 Verité, 2012</p>	
<p>Access to join a trade union</p>	<p>The law provides workers in general the right to join trade unions, however there are legal restrictions that limit access and overall, access to workers’ unions in Bangladesh is rated poorly by the Global Rights Index. The informal sector, which makes up 85% of the labor force, is not covered by the law. Additionally, unions are not permitted in Export Processing Zones (EPZ). The process to register trade unions is difficult and attempts are often rejected by the government. Workers are sometimes subject to mass dismissals for attempts to unionize and may be blacklisted in their sector. The police have sometimes interfered in trade union activities and trade union leaders have been subject to criminal prosecutions. Striking workers are sometimes arrested and have been subject to police violence. There have been multiple instances where workers have been killed by police while attempting to disperse the workers. US Department of State, 2022 , ITUC, 2023</p> <p>Trade Unions are officially allowed in the shrimp processing industries. There were 13 registered trade unions of which 8-9 are active, but most of them are new and inactive in addressing issues of the workers in workplaces. Global March, March 2021</p>	<p>US Department of State, 2022 Country Reports on Human Rights Practices: Bangladesh</p> <p>ITUC, 2023, Global Rights Index 2023</p> <p>Global March Against Child Labor, March 2021, Mapping and Analysis of Child Labor and Associated Stakeholders in Shrimp Fry Collection in Targeted Upazilas of Bangladesh</p>
<p>Participation in voluntary schemes and implementation of</p>	<p>During the annual 65-day fishing ban in Bangladesh, rural and artisanal fishers were suffering from not having a source of income during that time. Due to a study facilitated by the Danish Institute for Human Rights allowed them to receive aid during the bans.</p>	<p>The Danish Institute for Human Rights, Enhancing the livelihoods of small-</p>

Indicator	Description	Sources
<p>comprehensive corporate policies and strategies to combat forced labor, human trafficking, and hazardous child labor</p>	<p>This study also opened new avenues for the Boat Owner’s Association and the Fisher’s Union to compensate fisher’s families due to injury or death at sea. The Danish Institute is currently pushing for further innovations. The Danish Institute for Human Rights</p> <p>Third-party certification schemes for seafood are present in Bangladesh to a limited degree.</p> <p>Currently, two companies have achieved certification to the Aquaculture Stewardship Council (ASC) Shrimp Standard for farming giant tiger shrimp and giant river prawn. The Standard includes requirements relating to the minimum age of work, use of contract agreements, freedom to leave the workplace and to terminate employment, among others. ASC, 2023</p> <p>In addition, several shrimp farms (3) and processors (5) producing giant tiger shrimp, giant river prawn, and speckled shrimp are certified to Best Aquaculture Practices (BAP) Standards, which include requirements relating to social accountability and more specifically child labor, forced labor, and human trafficking. BAP, 2023</p>	<p>scale fishers in Bangladesh</p> <p>Aquaculture Stewardship Council (ASC), 2023, ‘Find a Farm’</p> <p>Best Aquaculture Practices (BAP), 2023, ‘Find BAP-Certified Producers’</p>

Table 2: Bangladesh - Seafood industry-level indicators

Bangladesh: Aquaculture Indicators

Indicator	Description	Sources
<p>Direct evidence of Forced labor, human trafficking, and hazardous child labor</p>	<p>Shrimp farming in Bangladesh has been connected to forced labor and hazardous child labor.</p> <p><u>Forced labor and human trafficking</u></p> <p>While the 2022 Trafficking in Persons Report states that traffickers use coercive debts to force Bangladeshi families and Indian migrant workers to work in shrimp farming, this is not specifically mentioned in the 2023 report. US Department of State, 2022 , US Department of State, 2023</p> <p><u>Hazardous child labor</u></p> <p>Children primarily work in wild fry catching, which, although not formally recognized, is considered hazardous work as children are subjected to health hazards including waterborne illnesses due to long staying in the water, drowning and attack of crocodiles and tigers. Global March, 2021 The estimated ratio of people involved in fry catching are: 40% men, 30% women and 30% children. Verité, 2012</p>	<p>US Department of State, 2022, 2022 Trafficking in Persons Report</p> <p>US Department of State, 2023, 2023 Trafficking in Persons (TIP) Report</p> <p>Global March Against Child Labor, March 2021, Mapping and Analysis of Child Labor and Associated Stakeholders in Shrimp Fry Collection in Targeted Upazilas of Bangladesh</p> <p>Verité, 2012, Research on Indicators of Forced Labor in the Supply Chain of Shrimp in Bangladesh</p>
<p>ILO indicators of forced labor and ILO R190 definition of</p>	<p><u>Forced labor</u></p> <p>There is evidence of debt bondage in shrimp farming dating back over the past decade.</p>	<p>Verité, 2012, Research on Indicators of Forced Labor in the Supply</p>

Indicator	Description	Sources
hazardous child labor	<p>Verité (2012) found several indicators of forced labor in fry catching and farming. These included sexual harassment and violence against women working as fry catchers or on farms, abuse and harassment, indebtedness, low wages, withholding of wages, overtime, and health hazards. In addition, specifically for fry catchers there was engagement in illegal activities as the practice has been banned by the government. For farmers, there were additional indicators in relation to limited freedom of movement and communication, dismissal, or exclusion from future employment, and forced work for employer’s private home or family for farm workers. Verité, 2012</p> <p>Violence and abuse against women at farm level are also reported. Global March, 2021</p> <p>The International Trade Union Confederation (ITUC) reported in 2016 that bonded labor was prevalent throughout the Bangladeshi shrimp industry, with fry catchers and farmers reporting regular debt bondage to intermediaries. According to the report, conditional loans are taken as supplementary income in the low season and as start-up capital. Their debts rise through interest, and forces fry catchers and shrimp farmers to sell their product at a fixed price to these intermediaries. ITUC, 2016</p> <p>Fry collectors may never escape debt cycles and spend most of their lives as bonded laborers. EJF, 2014</p> <p>The risk of fry catchers becoming debt bonded to middlemen was also previously highlighted by the now outdated 2012 publication from Verité on the indicators of forced labor in Bangladesh’s shrimp farming industry, which noted that if the fry catchers</p>	<p>Chain of Shrimp in Bangladesh</p> <p>Global March Against Child Labor, March 2021, Mapping and Analysis of Child Labor and Associated Stakeholders in Shrimp Fry Collection in Targeted Upazilas of Bangladesh, 2021</p> <p>International Trade Union Confederation (ITUC), Precarious Work in the Asian Seafood Global Value Chain, 2016</p> <p>Environmental Justice Foundation (EJF), 2014, Impossibly Cheap: Abuse and Injustice in Bangladesh's Shrimp Industry</p> <p>US Department of Labor, 2022, 2021 Findings on the Worst Forms of Child Labor: Bangladesh</p>

Indicator	Description	Sources
	<p>did not meet their requirements, they risked being beaten. Verité, 2012</p> <p>Wild shrimp fry catchers are considered the most vulnerable workers in the supply chain, with some not having permanent shelter, some being landless, poor, and often indebted. Global March, 2021</p> <p><u>Child labor</u></p> <p>According to the US Department of Labor’s 2021 Findings on the Worst Forms of Child Labor, Bangladesh’s shrimp industry is a product of child labor in both harvesting and processing shrimp. US Department of Labor, 2022</p> <p>Child labor remains common in the Bangladeshi shrimp industry, especially in shrimp fry collection. Children become involved to support their family’s low income. The work threatens their safety, with risks of wild animal attacks and drowning in the Bangladeshi Sundarbans area. International Trade Union Confederation (ITUC), 2016</p> <p>This is supported by a more recent report by Global March Against Child Labor on ‘Mapping and Analysis of Child Labor and Associated Stakeholders in Shrimp Fry Collection in Targeted Upazilas of Bangladesh’ that identified child labor in the following levels:</p> <p>Fry catching: The reports indicates that, while the actual number of children involved are disputed, all approached stakeholders for the study, ranging from local NGO’s, government officials, confirmed involvement of children in shrimp fry catching activities. While the work is not listed as hazardous by national-level policymakers and government officials and therefore not a priority target to address, it can be considered hazardous through risks of attack by</p>	

Indicator	Description	Sources
	<p>predators (crocodiles, tigers, snakes and even by sharks), and of waterborne diseases through long staying in the water.</p> <p>Farming – small scale: Children are engaged along with their parents and other family members to provide support to the family initiatives.</p> <p>Farming – medium and large scale: Local NGOs indicated that many children, aged 10-12 years, are engaged as workers and work alongside their mothers in <i>ghers</i>. Work included building/repairing embankments, pulling the nets, riding boats, feeding the shrimps, cleaning moss etc.</p> <p>Notably, the Global March 2021 report describes a situation where the different stakeholders that were interviewed, including government officials, were undecided whether children helping their family can be considered as child labor and that there is an overall cultural acceptance of children working. Global March, March 2021</p>	
Labor supply in the domestic market	<p>The overall Bangladeshi labor force was reported to be about 69.8 million in 2021, comprising of people aged 15 and older who supply labor for the production of goods and services. The World Bank, 2022</p> <p>Most of the shrimp production, referring here mainly to giant tiger shrimp, takes place in the coastal districts, where alternative livelihoods are lacking. According to EJF, (2014), workers that were interviewed stated that the reason they work on shrimp farms is because this was the only job accessible to them. EJF, 2014</p> <p>The NGO Bangladesh Shrimp and Fish Foundation estimates that over 600,000 people are employed directly in shrimp aquaculture production, which in</p>	<p>The World Bank – Labor Force, total – Bangladesh, accessed on 28 October 2022</p> <p>Environmental Justice Foundation (EJF), 2014, Impossibly Cheap: Abuse and Injustice in Bangladesh's Shrimp Industry</p> <p>Global March Against Child Labor,</p>

Indicator	Description	Sources
	<p>turn supports approximately 3.5 million dependents. Global March, March 2021</p> <p>In the fry catching stage, EJF (2014) reports that more than 400,000 people are involved in collection of shrimp fry, consisting mainly women and children. EJF, 2014 The IUTC 2016 report states while there are no exact numbers, it is estimated that several hundred thousand people are involved in wild fry collection along the coast and estuaries. ITUC, 2016</p> <p>At the farming stage, there are estimated to be around 300,000 shrimp farmers (Global Seafood Alliance, 18 March 2019), of which 75% can be considered small-scale. EJF (2014) reports that about 80% of farms are operated by the farm owners, while 20% are leased by tenant farmers from landowners. It further estimates that about 10 people are dependent directly on each shrimp farm. EJF, 2014 Only a few women own shrimp farms in Bangladesh.</p>	<p>March 2021, Mapping and Analysis of Child Labor and Associated Stakeholders in Shrimp Fry Collection in Targeted Upazilas of Bangladesh</p> <p>International Trade Union Confederation (ITUC), 2016, Precarious Work in the Asian Seafood Global Value Chain</p> <p>Global Seafood Alliance, 18 March 2019, 'Bangladesh seeks more buck for its 'bagda''</p>
Aquaculture Characteristics	<p>Isolation of the site</p> <p>While the actual isolation of the shrimp farming sites is not known, most shrimp farming area is concentrated in south-western Bangladesh. The farms employ rural workers where they have essentially no other option for work. Verité, 2012</p> <p>With approximately 90% of its total workforce confined to the poorest sections of the coastal communities, making the sector extremely susceptible to labor and human rights abuses. In terms of registration, the Bangladesh's shrimp supply chain is largely unregistered. Fry catching is an</p>	<p>Verité, 2012, Research on Indicators of Forced Labor in the Supply Chain of Shrimp in Bangladesh</p> <p>Environmental Justice Foundation (EJF), 2014, Impossibly Cheap: Abuse and Injustice</p>

Indicator	Description	Sources
	<p>unregistered activity, with workers not required to provide or receive any documentation for their transactions, which tends to be carried out through intermediaries. EFJ, 2014</p> <p>The EFJ report details that according to a 2010 survey by the Coastal Development Partnership (CDP), more than 90% of shrimp farms were unregistered. A more recent article from 2021 however, states 206,000 shrimp farms are registered as part of traceability efforts to register and license all shrimp farms. Business Inspection, 16 June 2021</p> <p>While registration could provide benefits, for example by addressing child labor as labor laws do not apply to children working in the informal sector, it is however unlikely at this stage that farms will be subjected to labor inspections due to difficulty of accessing locations and by resource constraints.</p>	<p>in Bangladesh's Shrimp Industry</p> <p>Business Inspection, 16 June 2021, 'Shrimp Farming in Bangladesh: Why Shrimp Sector is Lagging Behind?'</p>
	<p>Child-adult ratio in aquaculture communities</p> <p>No information was found specifically on child-adult ration in aquaculture communities. The Bangladesh average fertility rate has seen a significant reduction from 6.3 in 1980, to 4.6 in 1990, to 1.979 in 2021. Macrotrends, 2022</p> <p>However, fertility rates are likely still higher for poor families in rural areas (where most aquaculture production occurs). D+C, 16 June 2018</p>	<p>Macrotrends, Bangladesh Fertility Rate 1950-2022, accessed on 28 October 2022</p> <p>D+C, 16 June 2018, 'Motherhood: Health Change'</p>
Workforce Characteristics	<p>The proportion of low-skilled migrant workers</p> <p>Verité conducted various case studies, and in one such case study of a shrimp farm in Thana, 78% of the workers were local to that region. However, the majority of all the workers in that study were either illiterate or had completed primary school. Less than</p>	<p>Verité, 2012, Research on Indicators of Forced Labor in the Supply Chain of Shrimp in Bangladesh</p>

Indicator	Description	Sources
	<p>10 workers interviewed completed secondary school. Verité, 2012</p> <p>An NGO in the Global March report states there is a very low level of education among child fry catchers and children engaged in farming, trading, etc. as workers. Almost all the children are enrolled in primary schools but do not attend regularly. Global March, March 2021</p>	<p>Global March Against Child Labor, March 2021, Mapping and Analysis of Child Labor and Associated Stakeholders in Shrimp Fry Collection in Targeted Upazilas of Bangladesh</p>
	<p>Legal presence/regularity of migrant workers</p> <p>There is little information known on the legal presence or regularity of migrant workers.</p> <p>Most workers in fry collecting or farming appear to be Bangladeshi people that are local or internally migrant from other districts. The 2022 Trafficking in Persons Report stated that there was evidence of Indian migrant workers being forced to work in shrimp farming, however this is not further mentioned in the 2023 report. US Department of State, 2022</p> <p>Given that work on shrimp farms is seasonal, it draws local and migrant Bangladeshi labor. IUTC, 2016</p> <p>Some fry catchers are reported to internally migrant from other sub-districts or neighboring districts, because of climate induced natural disasters. Verité, 2012</p> <p>There are no administrative restrictions for internal migration. Alam & Mamun, 2022</p>	<p>US Department of State, 2022, 2022 Trafficking in Persons Report</p> <p>International Trade Union Confederation (ITUC), Precarious Work in the Asian Seafood Global Value Chain, 2016</p> <p>Verité, 2012, Research on Indicators of Forced Labor in the Supply Chain of Shrimp in Bangladesh</p> <p>Alam, M. Z., & Mamun, A. A., 2022. Dynamics of internal migration in Bangladesh: Trends,</p>

Indicator	Description	Sources
		patterns, determinants, and causes. PloS one, 17(2), e0263878.
<p>Recruitment and Contracts</p>	<p>Use of recruitment agents</p> <p>There is little information available about the use of recruitment agents in shrimp aquaculture. Fry catching is an informal and unregulated practice and is unlikely to involve the use of recruitment agents, although the INCIDIN 2019 case study reported that 24% of the surveyed children said that they are engaged by others for fry collecting.</p> <p>Farming, especially small-scale family farms, is conducted by farm owners and their family members. Medium and large-scale farms may be using recruitment agents to hire workers, given the seasonality of aquaculture production would require short-term labor, for example, during harvest, which generally involves recruitment agents.</p>	<p>INCIDIN Bangladesh, Study on Child Labour in Hazardous Sectors in Bangladesh, 2019 -cited in Global March Against Child Labor, Mapping and Analysis of Child Labor and Associated Stakeholders in Shrimp Fry Collection in Targeted Upazilas of Bangladesh, 2021</p>
	<p>Contract-and compensation- related regulations and practices</p> <p>Worker compensation varies significantly between men, women, and children.</p> <p>The Global March report indicated, in the case of fry catching, the difference in wage between an adult and child reported by one NGO was 500 takas (USD 4.93) versus 80 takas per day (USD 0.79), with children sometimes paid only with food. The INCIDIN Bangladesh case study additionally revealed that there appears to be a gender-based wage gap between children shrimp fry catchers as well, with</p>	<p>Global March Against Child Labor, March 2021, Mapping and Analysis of Child Labor and Associated Stakeholders in Shrimp Fry Collection in Targeted Upazilas of Bangladesh</p> <p>INCIDIN Bangladesh, Study on Child Labour in</p>

Indicator	Description	Sources
	<p>girls earning 1487 taka (USD 14) and boys 2134 takas (USD 20) a month.</p> <p>For shrimp farming, women were reported to receive less than men with 300 takas (USD 3.96) compared to 250 takas (USD 2.47). In most cases, women and children contribute unpaid labor as part of family farming. Global March, March 2021 Or they work as contract laborers on medium to large scale farms.</p> <p>There is little information on contract regulation for fry catching and shrimp farming. Given that fry catching is officially forbidden, fry catchers do not have official contracts and are subjected to corruption, coercion, and extortion or forced to sell their fry to their debtors in cases where they have taken out loans. Indebted farmers may also be obliged to sell their product at a fixed price to traders that have provided funds. EJF, 2014</p> <p>The IUTC 2016 report elaborates that financial pressure on farmers can be extreme, as according to a 2012 study, farmers typically support a six-member family with a daily income of 350-taka equivalent to USD 0.83 per family member per day. As such, a lot of farmers are locked in debt cycles with limited options for livelihood diversification.</p> <p>The report further goes on to state that the Bangladesh Frozen Foods Exporters Association (BFEEA), holds a monopoly over the national market by uniting about two-thirds of the processing factories in Bangladesh. There are claims about prices being fixed below the value of shrimp farmers' product and lengthy delays in payment, with some reports of delays for more than a year. While processing plants receive subsidy payments in cases where shipments are cancelled or rejected, such</p>	<p>Hazardous Sectors in Bangladesh, 2019 -cited in Global March Against Child Labor, Mapping and Analysis of Child Labor and Associated Stakeholders in Shrimp Fry Collection in Targeted Upazilas of Bangladesh, 2021</p> <p>Environmental Justice Foundation (EJF), 2014, Impossibly Cheap: Abuse and Injustice in Bangladesh's Shrimp Industry</p> <p>International Trade Union Confederation (ITUC), 2016, Precarious Work in the Asian Seafood Global Value Chain</p>

Indicator	Description	Sources
	benefits are rarely passed on to shrimp farmers and depot owners. ITUC, 2016	

Table 3: Bangladesh - Aquaculture Indicators

Bangladesh: Processing indicators

Indicator	Description	Sources
<p>Direct evidence of forced labor, human trafficking, and hazardous child labor</p>	<p>The 2023 Trafficking in Persons Report states that traffickers force Bangladeshi families and Indian migrants by means of coercive debts to work in the shrimp and fish processing industries. US Department of State, 2023</p>	<p>US Department of State, 2023, 2023 Trafficking in Persons (TIP) Report</p>
<p>ILO indicators of forced labor and ILO R190 definition of hazardous child labor</p>	<p><u>Forced labor</u></p> <p>Conditions identified in shrimp processing amount to indications of forced labor with evidence of involuntariness (excessive overtime) and menace of penalty (abusive working conditions, violence, intimidation and threats, and withholding of wages). But note that much of the evidence found is from reports that are over five years old.</p> <p>The Verité report listed as other concerns in processing factories, labor contractors, gender segregation of job tasks, and wages. Contracted workers can come from local communities and migrant workers, the latter being extremely poor and vulnerable. Contractors hold a lot of power over the workers they supply, see indicator below ‘The proportion of temporary and contract versus permanent workers’.</p> <p>Work is divided based on a gendered perception, with men more likely to be involved in loading/unloading the shrimp from trucks, as well as grading the shrimp, and women in de-heading shrimp. This gendered approach implicates wage benefits, as women’s roles earn less.</p> <p>In addition, the report identifies indicators such as forced overtime, with the most common working hours ranging from 11-15 hours a day. A few workers</p>	<p>Verité, 2012, Research on Indicators of Forced Labor in the Supply Chain of Shrimp in Bangladesh</p> <p>Environmental Justice Foundation (EJF), 2014, Impossibly Cheap: Abuse and Injustice in Bangladesh's Shrimp Industry</p> <p>Global March Against Child Labor, March 2021, Mapping and Analysis of Child Labor and Associated Stakeholders in Shrimp Fry Collection in Targeted Upazilas of Bangladesh</p>

	<p>indicated having to work an average of 21-24 hours shifts, which are likely more common during peak periods, where workers will work in excess of 24-hour shifts. Peak production occurs twice per month. While workers mentioned it is voluntary and allows them to earn more money, there are indications that refusing overtime could threaten workers' jobs. Over 80% of the workers, both contract and permanent, worked 7 days a week.</p> <p>Furthermore, Verité reports incidences of verbal abuse and sexual harassment. If any grievances were issued about working conditions, like overtime, sexual harassment, hazardous conditions, or verbal abuse, it could result in dismissal. Verité, 2012</p> <p>The 2014 EJF report details the following evidence derived from worker testimonies, like restricted union activities. The activity of labor unions is severely restricted. While unions are legally permitted to act on behalf of workers, government activity makes the formation of new trade unions extremely difficult, particularly in the garment and shrimp sectors.</p> <p>Workers are reported to work excessive hours without rest and experience delays in payment and underpayment. In addition, few workers are provided with protective equipment that would prevent many of the common injuries or illnesses encountered when processing shrimp, because they are considered to slow down the workers. Reports of cuts, fungal infections, arthritis, urinary tract infections, repetitive strain injury and diarrhea are widely reported illnesses in the processing industry. Also, processing workers having their hands constantly submerged in icy water can result in numbness, skin irritation, skin infections, fever, and even partial paralysis. EJF, 2014</p>	
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	<p>The Global March 2021 report also mentions women facing violence and abuse in processing factories. Global March, March 2021</p> <p><u>Child labor</u></p> <p>Verité reports that children aged 10-15 years were engaged in processing work and workers indicating that they would bring children with them to their jobs. Verité, 2012</p> <p>The later issued Global March 2021 report suggests that the shrimp processing industry is almost free of child labor. Children could still be seen during peak season as contractual workers, but numbers are significantly reduced from what they were 10 to 12 years ago. It is reported that children are still involved in processing work done at the arat (large traders) and depot level after farming but before formal processing, where it is reported they are only engaged for a short period of time and only do light work. There are issues of restricted access to the processing factories and a lack of adequate research on the present situation of compliance with relevant national and international labor standards. Given that the number of children involved is deemed to be small, these intermediary stages between farming and processing plants are not prioritized for inspection. Global March, March 2021</p>	
Processing Characteristics	<p>Processing stage</p> <p>While formal processing takes place at processing plants, prior to arrival the product may be pre-processed. Preprocessing can occur at several levels, like at a household where shrimp is delivered to be size graded. At the <i>faria</i> (small-scale traders), <i>aratdar</i> (large-scale traders) and depots. Because the shrimp value chain is long and does not have a secure cold chain, shrimp don't stay long at each stage.</p>	<p>Global March Against Child Labor, March 2021, Mapping and Analysis of Child Labor and Associated Stakeholders in Shrimp Fry Collection in</p>

		Targeted Upazilas of Bangladesh
	<p>Consolidation and vertical integration</p> <p>The Bangladeshi shrimp supply chain is characterized by poor consolidation and vertical integration, with complex supply chain linkages and many actors that could be involved at different levels. There are numerous possible supply chain routes that shrimp product could travel and due to the small harvest volumes of small-scale farmers, especially for giant tiger shrimp production, product ownership changes multiple times before it reaches the factory. Shrimp Insights, 16 December 2020</p> <p>Besides this, low productivity also means that for a 15 Mt container to be filled with shrimp product for export, harvests of numerous farms would be needed. These two factors make traceability of product near impossible and without product traceability, it is difficult to determine whether product purchased comes from a supply chain route in which forced labor, human trafficking, and hazardous child labor has occurred, at which stage and to what extent.</p>	Shrimp Insights, 16 December 2020, Black Tiger Shrimp: Mainstream Turned Niche
	<p>Domestic versus export</p> <p>As shrimp intended for export fetches a higher price than at the domestic market, shrimp is predominantly produced for export. Approximately 80% of shrimp product is exported, while the remainder is sold on the domestic market. Global March, March 2021</p>	Global March Against Child Labor, March 2021, Mapping and Analysis of Child Labor and Associated Stakeholders in Shrimp Fry Collection in Targeted Upazilas of Bangladesh

<p>Workforce Characteristics</p>	<p>Skilled versus low-skilled</p> <p>Recent data was not found. Outdated evidence suggests that education levels among processing workers are low, with one third of interviewed workers describing themselves as illiterate, around half completing primary school, and remainder completing secondary (13.5%) or high secondary school education (2.3 %). Verité, 2012</p>	<p>Verité, 2012, Research on Indicators of Forced Labor in the Supply Chain of Shrimp in Bangladesh</p>
	<p>The proportion of women in the workforce</p> <p>While women are engaged in the informal pre-processing stages, they are predominantly operating in formal processing plants. It is estimated that 70% of the workforce at processing plants are women. Stereotyped beliefs about gendered roles of women result in women being mainly involved in factory roles as workers responsible for de-heading, cleaning, and bagging of shrimp. Global March, March 2021 , Verité, 2012</p> <p>The FAO and World Fish report mentions that men get better positions and salaries in the factories. There were some cases where women given ‘supervisory positions’, because female supervisor are more effective to handle the large number of female workers. However, these women are usually just supervisors in name, and only have the responsibility of dealing with “women’s issues” and overseeing women. FAO and World Fish, 2017</p> <p>Women are mainly employed as contract workers, outsourced by third party contractors. Many young girls take up contract work in the factories from the age of 14 and study at the same time. Global March, March 2021 , FAO and World Fish, 2017</p>	<p>Global March Against Child Labor, March 2021, Mapping and Analysis of Child Labor and Associated Stakeholders in Shrimp Fry Collection in Targeted Upazilas of Bangladesh</p> <p>Verité, 2012, Research on Indicators of Forced Labor in the Supply Chain of Shrimp in Bangladesh</p> <p>FAO and World Fish, 2017, Women’s empowerment in aquaculture: Two case studies from Bangladesh</p>
	<p>The proportion of migrant versus local workers</p>	<p>US Department of State, 2023, 2023</p>

	<p>The 2023 Trafficking in Person Report references Indian migrant workers forced to work in the shrimp processing industry, but the proportion and extent is not clear. US Department of State, 2023</p> <p>Other recent data was not found. Outdated evidence suggests that some internal migrant labor is used. The Verité report indicates that 18.8% of the workers that were interviewed had migrated domestically to work in the shrimp sector. The report further indicated that a wage difference applied between local and migrant workers. Local workers had an average wage of 2,319 Taka (USD 21) per month, while those who migrated reported an average wage of only 1,919 Taka (USD 18) per month. Verité, 2012</p>	<p>Trafficking in Persons (TIP) Report</p> <p>Verité, 2012, Research on Indicators of Forced Labor in the Supply Chain of Shrimp in Bangladesh</p>
	<p>The proportion of minority or indigenous workers</p> <p>Unknown.</p> <p>No specific mentionings or references were found regarding the inclusion or proportion of minority and indigenous workers.</p>	
	<p>The proportion of temporary and contract versus permanent workers</p> <p>No recent evidence was found.</p> <p>A study conducted in 2014 on Rights, Benefits and Social Justice: Status of Women Workers Engaged in the Shrimp Processing Industries of Bangladesh estimated that between 70-80% of the workforce are contract laborers. The reason given is because of the seasonality of the work, and therefore wanting to keep permanent labor to a minimum to keep costs at a minimum. As a result, large sections of the workforce are deprived of labor benefits under the pretext of periodic supply of shrimp products. In addition,</p>	<p>Nuruzzaman, M., Selim, S.U.M., Miah, M.H., 2014, Rights, Benefits and Social Justice: Status of Women Workers Engaged in the Shrimp Processing Industries of Bangladesh. Asian Fisheries Science, Vol. 27, pp. 151-163.</p> <p>Verité, 2012, Research on Indicators of Forced Labor in the Supply</p>

	<p>contract labor tends to be underreported to hide this aspect. Nuruzzaman et al., 2014</p> <p>Verité 2012, corroborates this deprivation of benefits and further states that workers categorized as “contract” employees do not have actual contracts with the employers and that contract workers are predominantly female. Contractors are used because it allows factory access to a highly flexible labor pool and to avoid any direct employment relationship with these workers. Factories may work with several contractors to provide workers. Contractors may act as their workers' supervisors within the facility allowing them to enforce disciplinary measures or fire workers. Expressing grievances could lose workers' their job.</p> <p>Contractors also control workers' wages, often to the workers' disadvantage, for example, using the piece-rate system as discussed in the ‘Compensation Method’ below. Verité, 2012</p>	<p>Chain of Shrimp in Bangladesh</p>
	<p>Workers’ origins</p> <p>Workers are local to the district where the processing plants are located or migrated to these districts from other sub-districts or neighboring districts.</p> <p>Some reports specifically describe the origin of women. According to these reports, three types of women are involved in processing plants: widows or separated women, married and unmarried young women. Most of them are internal migrants from other sub-districts or nearby districts, fleeing from natural disasters. They do not hold power like the local inhabitants of the subdistrict, making them easy to exploit. The workers are mostly from poor and moderate poor socio-economic backgrounds. Most of them follow the religion of Islam, with only a few</p>	<p>Global March Against Child Labor, March 2021, Mapping and Analysis of Child Labor and Associated Stakeholders in Shrimp Fry Collection in Targeted Upazilas of Bangladesh</p> <p>Verité, 2012, Research on Indicators of Forced Labor in the Supply</p>

	Hindus. Global March, March 2021 , FAO and World Fish 2017	Chain of Shrimp in Bangladesh FAO and World Fish, 2017, Women's empowerment in aquaculture: Two case studies from Bangladesh
	Migrant worker language (vs. dominant language in the industry) Workers are predominantly internal migrants from other subdistricts or neighboring districts. The national and most common spoken language is Bengali which is spoken by 98% of the population. There are regional dialects and other languages spoken, but a very high percentage of the population can speak the same language. World Atlas, 2023	World Atlas, accessed on 26 March 2023
	GDP per capita of processing country and main worker source country The main workers are from Bangladesh, so Bangladesh GDP per capita applies.	
	Legal presence (regularity) of migrant workers Most workers are internal migrants from other subdistricts or neighboring districts. There are no administrative restrictions for internal migration. No information was found on external migrants. Alam & Mamun, 2022	Alam, M. Z., & Mamun, A. A., 2022. Dynamics of internal migration in Bangladesh: Trends, patterns, determinants, and causes. PloS one, 17(2), e0263878.

	<p>The ability of migrant workers to change jobs</p> <p>No specific information was found on the ability of migrant workers to change jobs. Given that most processing factory workers are contract workers, job security could be a concern during low season. Global March, March 2021</p>	<p>Global March Against Child Labor, March 2021, Mapping and Analysis of Child Labor and Associated Stakeholders in Shrimp Fry Collection in Targeted Upazilas of Bangladesh</p>
Recruitment and Contracts	<p>Use of contractors and recruitment agents</p> <p>During peak season (April to December for giant tiger shrimp and September to December for giant river prawn) farms hire contract workers via contractors. Permanent workers are hired by the company throughout the year. FAO and World Fish, 2017</p>	<p>FAO and World Fish, 2017, Women’s empowerment in aquaculture: Two case studies from Bangladesh</p>
	<p>Compensation method</p> <p>The compensation methods used in factories depends on the type of employment. Permanent workers are paid monthly, while contract workers are paid via a piece-rate system. Through employing a piece rate system, where employees are paid a fixed rate for each unit of production processed, processing plants can reduce labor costs. The Global March 2021 report mentions that while wage discrimination was denied, discussion revealed that men earned 300 takas (US\$ 2.77) whereas women would receive 250 takas (US\$ 2.30) for the same work. Global March, March 2021 , FAO and World Fish, 2017 , EJF, 2014</p> <p>Although outdated, the 2012 SAFE report indicates that almost three-quarters of contract workers receive less than the national established minimum</p>	<p>Global March Against Child Labor, March 2021, Mapping and Analysis of Child Labor and Associated Stakeholders in Shrimp Fry Collection in Targeted Upazilas of Bangladesh</p> <p>FAO and World Fish, 2017, Women’s empowerment in aquaculture: Two</p>

	<p>wage and that half of the permanent workers receive their payments late. It reports that the nationally established minimum wage for the shrimp-processing industry is 2,645 taka per month, but wages can vary significantly between 1,800–5,500 taka (US\$ 23 - \$ 70.50) per month and contract workers between 1,500-4,000 takas (US\$ 19.20 - \$ 51). At the time of the report, pay records were virtually non-existent. SAFE, 2012</p> <p>The 2014 EJF report details evidence of underpaying for work completed, where quantity of shrimp processed is measured by baskets instead of weight with employers underestimating the capacity of the baskets.</p> <p>Furthermore, both contract and permanent workers regularly worked 12-hour days but were not paid overtime, were not given holidays, and many worked seven days a week. Some workers reported not receiving lunch or toilet breaks. There are statements from workers who encountered verbal abuse when not working fast enough.</p> <p>Worker testimonies further indicate that processing factories are committing labor violations by not providing payment when it is due and underpaying for work completed. It also reported that workers are punished for absence due to illness. EJF, 2014</p> <p>The FAO and World Fish 2017 study reports some slight positive developments, with a minimum wage of 4,419 takas per month (US\$ 53) being established for permanent workers in 50% of the companies in 2014 and working 8-to-12-hour shifts. Contract workers paid through the piece rate system were reportedly paid around 5 taka (US\$ 0.06) per basket token, but on some occasions could be up to 10 takas (US\$ 0.13). Permanent workers officially are to receive appointment letters, ID cards, maternity leave, a two-</p>	<p>case studies from Bangladesh</p> <p>Environmental Justice Foundation (EJF), 2014, Impossibly Cheap: Abuse and Injustice in Bangladesh's Shrimp Industry</p> <p>Solidarity Center and Social Activities For Environment (SAFE), 2012, The Plight of Shrimp-Processing Workers of Southwestern Bangladesh</p>
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	<p>day per month holiday, annual leave, rest breaks, festival bonuses, medical facilities, and PPE, while contract workers just receive some ointments for cuts and PPE. However, not all factories provide these benefits. FAO and World Fish, 2017</p>	
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Table 4: Bangladesh - Processing indicators

References

- ⁱ Department of Fisheries, Bangladesh, December 2022, Yearbook of Fishery Statistics 2021-2022. Available at <http://fisheries.portal.gov.bd/site/download/42836060-aa5e-491d-8309-cf750886813b> [Accessed on 23 July 2023].
- ⁱⁱ Shrimp Insights, 16 December 2020, 'Black Tiger Shrimp: Mainstream Turned Niche'. Available at <https://shrimpsights.com/blog/black-tiger-shrimp-mainstream-turned-niche> [Accessed on 17 March 2023].
- ⁱⁱⁱ LightCastle Partners, 2022, Bangladesh Shrimp Sector: Transitioning Towards Sustainable Growth. Available at <https://www.lightcastlebd.com/insights/2022/08/bangladesh-shrimp-sector-transitioning-towards-sustainable-growth/>
- ^{iv} Global March, 2021, Mapping and Analysis of Child Labour and Associated Stakeholders in Shrimp Fry Collection in Targeted Upazilas of Bangladesh. Available at <https://globalmarch.org/mapping-and-analysis-of-child-labour-and-associated-stakeholders-in-shrimp-fry-collection-in-targeted-upazilas-of-bangladesh/> [Accessed on 28 March 2023].
- ^v Washim, M.R., Siddiky, M., Islam, S., and Ahmed, S., 2020, Improved extensive shrimp farming uplifted yield of coastal ghers in southwest Bangladesh. International Journal of Science: Basic and Applied Research, Vol.52 (1), pp. 78-87. Available at <https://core.ac.uk/download/pdf/337387648.pdf#:~:text=Shrimp%20is%20known%20as%20the%20white%20gold%20of,improving%20the%20management%20practices%20in%20extensive%20shrimp%20ghers> [Accessed on 28 March 2023].
- ^{vi} Business Inspection BD, 16 June 2021, 'Shrimp Farming in Bangladesh: Why Shrimp Sector is Lagging Behind?'. Available at <https://businessinspection.com.bd/why-the-shrimp-sector-of-bangladesh-is-lagging-behind/> [Accessed on 30 November 2022].
- ^{vii} United Nations Office on Drugs and Crime (UNODC), No date, 'Bangladesh: Interview with Prof. Zakir Hossain on Human Trafficking'. Available at https://www.unodc.org/southasia/frontpage/2009/September/bangladesh_-interview-with-prof.-zakir-hossain-on-human-trafficking-.html [Accessed on 02 September 2023].
- ^{viii} US Department of State, 2023, 2023 Trafficking in Persons Report: Bangladesh. Available at <https://www.state.gov/reports/2023-trafficking-in-persons-report/bangladesh/> [Accessed on 02 September 2023].
- ^{ix} Eurasian Research Institute (ERI), No date, 'The Causes of Child Labor in Bangladesh'. Available at <https://www.eurasian-research.org/publication/the-causes-of-child-labor-in-bangladesh/> [Accessed on 30 January 2023].
- ^x United Nations Office on Drugs and Crime (UNODC), No date, 'Bangladesh: Interview with Prof. Zakir Hossain on Human Trafficking'. Available at https://www.unodc.org/southasia/frontpage/2009/September/bangladesh_-interview-with-prof.-zakir-hossain-on-human-trafficking-.html [Accessed on 30 January 2023].
- ^{xi} Migration Policy Institute, 18 March 2021, 'Stateless and Persecuted: What Next for the Rohingya?'. Available at <https://www.migrationpolicy.org/article/stateless-persecuted-rohingya> [Accessed on 30 January 2023].
- ^{xii} US Department of State, 2023, 2023 Trafficking in Persons Report: Bangladesh. Available at <https://www.state.gov/reports/2023-trafficking-in-persons-report/bangladesh/> [Accessed on 06 August 2023].
- ^{xiii} US Department of State, 2023, 2023 Trafficking in Persons Report: Bangladesh. Available at <https://www.state.gov/reports/2023-trafficking-in-persons-report/bangladesh/> [Accessed on 06 August 2023].
- ^{xiv} Committee on the Protection of the Rights of All Migrant Workers and Members of Their Families, 29 February 2016, Consideration of reports submitted by States parties under article 73 of the Convention, Initial reports of States parties due in 2012 Bangladesh, CMW/C/BGD/1. Available at https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolNo=CMW%2FC%2FBGD%2F1&Lang=en [Accessed on 28 March 2023].
- ^{xv} International Trade Union Confederation (ITUC), 2023, Global Rights Index 2023. Available at <https://www.globalrightsindex.org/en/2023> [Accessed on 06 August 2023].

-
- ^{xvi} US Department of State, 2022, 2022 Country Reports on Human Rights Practices: Bangladesh. Available at <https://www.state.gov/reports/2022-country-reports-on-human-rights-practices/bangladesh/> [Accessed on 06 August 2023].
- ^{xvii} International Trade Union Confederation (ITUC), 2023, Global Rights Index 2023. Available at <https://www.globalrightsindex.org/en/2023> [Accessed on 06 August 2023].
- ^{xviii} International Trade Union Confederation (ITUC), 2023, Global Rights Index 2023. Available at <https://www.globalrightsindex.org/en/2023> [Accessed on 06 August 2023].
- ^{xix} International Trade Union Confederation (ITUC), 2023, Global Rights Index 2023. Available at <https://www.globalrightsindex.org/en/2023> [Accessed on 06 August 2023].
- ^{xx} The Guardian, 28 June 2023, 'Bangladeshi labour leader beaten to death while trying to resolve dispute'. Available at <https://www.theguardian.com/global-development/2023/jun/28/shahidul-islam-bangladeshi-labour-leader-shahidul-islam-beaten-to-death-wages-dispute> [Accessed on 23 July 2023].
- ^{xxi} Solidarity Center, 28 June 2023, 'Solidarity Center condemns murders of union leaders in Bangladesh, Honduras'. Available at <https://www.solidaritycenter.org/solidarity-center-condemns-murders-of-garment-union-leaders-in-bangladesh-honduras/> [Accessed on 23 July 2023].
- ^{xxii} Fashion United, 29 June 2023, 'A Bangladeshi garment union leader was killed after a pay dispute'. Available at <https://fashionunited.uk/news/people/a-bangladeshi-garment-union-leader-was-killed-after-a-pay-dispute/2023062970274> [Accessed on 23 July 2023]
- ^{xxiii} International Accord for Health and Safety in the Textile and Garment Industry, no date. Available at <https://internationalaccord.org/> [Accessed on 20 August 2023].
- ^{xxiv} US Department of State, 2023, 2023 Trafficking in Persons Report: Bangladesh. Available at <https://www.state.gov/reports/2023-trafficking-in-persons-report/bangladesh/> [Accessed on 06 August 2023].
- ^{xxv} The Guardian, 30 June 2022, 'White gold': why shrimp aquaculture is a solution that caused a huge problem'. Available at <https://www.theguardian.com/environment/2022/jun/30/shrimp-aquaculture-bangladesh-solution-that-caused-huge-problem> [Accessed on 03 January 2023].
- ^{xxvi} Environmental Justice Foundation (EJF), 2003. Smash & Grab: Conflict, Corruption and Human Rights Abuses in the Shrimp Farming Industry. Environmental Justice Foundation, London, UK. Available at https://ejfoundation.org/resources/downloads/smash_and_grab.pdf [Accessed on 28 March 2023].
- ^{xxvii} EJF, 2003. Smash & Grab: Conflict, Corruption and Human Rights Abuses in the Shrimp Farming Industry. Environmental Justice Foundation, London, UK. Available at https://ejfoundation.org/resources/downloads/smash_and_grab.pdf [Accessed on 28 March 2023].
- ^{xxviii} The Guardian, 30 June 2022, 'White gold': why shrimp aquaculture is a solution that caused a huge problem'. Available at <https://www.theguardian.com/environment/2022/jun/30/shrimp-aquaculture-bangladesh-solution-that-caused-huge-problem> [Accessed on 03 January 2023].
- ^{xxix} EJF, 2014, Impossibly Cheap: Abuse and Injustice in Bangladesh's Shrimp Industry. Environmental Justice Foundation, London, UK Available at https://ejfoundation.org/resources/downloads/Impossibly_Cheap_Web.pdf [Accessed on 28 March 2023].
- ^{xxx} Global March, 2021, Mapping and Analysis of Child Labour and Associated Stakeholders in Shrimp Fry Collection in Targeted Upazilas of Bangladesh. Available at <https://globalmarch.org/mapping-and-analysis-of-child-labour-and-associated-stakeholders-in-shrimp-fry-collection-in-targeted-upazilas-of-bangladesh/> [Accessed on 28 March 2023].
- ^{xxxi} Global March, 2021, Mapping and Analysis of Child Labour and Associated Stakeholders in Shrimp Fry Collection in Targeted Upazilas of Bangladesh. Available at <https://globalmarch.org/mapping-and-analysis-of-child-labour-and-associated-stakeholders-in-shrimp-fry-collection-in-targeted-upazilas-of-bangladesh/> [Accessed on 28 March 2023].
- ^{xxxii} Global March, 2021, Mapping and Analysis of Child Labour and Associated Stakeholders in Shrimp Fry Collection in Targeted Upazilas of Bangladesh. Available at <https://globalmarch.org/mapping-and-analysis-of-child-labour-and-associated-stakeholders-in-shrimp-fry-collection-in-targeted-upazilas-of-bangladesh/> [Accessed on 28 March 2023].
- ^{xxxiii} Verite, 2012, Research on Indicators of Forced Labor in the Supply Chain of Shrimp in Bangladesh. Available at <https://core.ac.uk/download/pdf/19957706.pdf> [Accessed on 28 March 2023].

-
- ^{xxxiv} EJF, 2014, Impossibly Cheap: Abuse and Injustice in Bangladesh's Shrimp Industry. Environmental Justice Foundation, London, UK Available at https://ejfoundation.org/resources/downloads/Impossibly_Cheap_Web.pdf [Accessed on 28 March 2023].
- ^{xxxv} Verite, 2012, Research on Indicators of Forced Labor in the Supply Chain of Shrimp in Bangladesh. Available at <https://core.ac.uk/download/pdf/19957706.pdf> [Accessed on 28 March 2023].
- ^{xxxvi} Global March, 2021, Mapping and Analysis of Child Labour and Associated Stakeholders in Shrimp Fry Collection in Targeted Upazilas of Bangladesh. Available at <https://globalmarch.org/mapping-and-analysis-of-child-labour-and-associated-stakeholders-in-shrimp-fry-collection-in-targeted-upazilas-of-bangladesh/> [Accessed on 28 March 2023].
- ^{xxxvii} NEWAGE Bangladesh, 01 June 2022, 'Public-private initiatives stressed for ending child labour in shrimp industry'. Available at <https://www.newagebd.net/article/172139/public-private-initiatives-stressed-for-ending-child-labour-in-shrimp-industry> [Accessed on 28 October 2022].
- ^{xxxviii} Verite, 2012, Research on Indicators of Forced Labor in the Supply Chain of Shrimp in Bangladesh. Available at <https://core.ac.uk/download/pdf/19957706.pdf> [Accessed on 2 September 2023].
- ^{xxxix} EJF, 2014, Impossibly Cheap: Abuse and Injustice in Bangladesh's Shrimp Industry. Environmental Justice Foundation, London, UK Available at https://ejfoundation.org/resources/downloads/Impossibly_Cheap_Web.pdf [Accessed on 2 September 2023].
- ^{xl} Asia and Pacific Commission on Aquacultural Statistics (APCAS), 2016. Fisheries statistics in Bangladesh: Issues, challenges, plans. Bangladesh Department of Fisheries and FAO. Available at https://www.fao.org/fileadmin/templates/ess/documents/apcas26/presentations/APCAS-16-6.3.2_-_Bangladesh_-_Fisheries_Statistics_in_Bangladesh.pdf [Accessed on 29 August 2023].
- ^{xli} Verite, 2012, Research on Indicators of Forced Labor in the Supply Chain of Shrimp in Bangladesh. Available at <https://core.ac.uk/download/pdf/19957706.pdf> [Accessed on 28 March 2023].
- ^{xlii} Global March, 2021, Mapping and Analysis of Child Labour and Associated Stakeholders in Shrimp Fry Collection in Targeted Upazilas of Bangladesh. Available at <https://globalmarch.org/mapping-and-analysis-of-child-labour-and-associated-stakeholders-in-shrimp-fry-collection-in-targeted-upazilas-of-bangladesh/> [Accessed on 28 March 2023].
- ^{xliiii} Washim, M.R., Siddiky, M., Islam, S., and Ahmmed, S., 2020, Improved extensive shrimp farming uplifted yield of coastal ghers in southwest Bangladesh. International Journal of Science: Basic and Applied Research, Vol.52 (1), pp. 78-87. Available at <https://core.ac.uk/download/pdf/337387648.pdf#:~:text=Shrimp%20is%20known%20as%20the%20white%20gold%20of,improving%20the%20management%20practices%20in%20extensive%20shrimp%20ghers> [Accessed on 28 March 2023].
- ^{xliiii} Washim, M.R., Siddiky, M., Islam, S., and Ahmmed, S., 2020, Improved extensive shrimp farming uplifted yield of coastal ghers in southwest Bangladesh. International Journal of Science: Basic and Applied Research, Vol.52 (1), pp. 78-87. Available at <https://core.ac.uk/download/pdf/337387648.pdf#:~:text=Shrimp%20is%20known%20as%20the%20white%20gold%20of,improving%20the%20management%20practices%20in%20extensive%20shrimp%20ghers> [Accessed on 28 March 2023].
- ^{xliv} Global Seafood Alliance, 18 March 2019, 'Bangladesh seeks more buck for its 'bagda''. Available at <https://www.globalseafood.org/advocate/bangladesh-seeks-more-buck-for-its-bagda/> [accessed on 25 March 2023]
- ^{xlvi} ITUC, 2016, Precarious Work in the Asian Seafood Global Value Chain. Available at https://www.ituc-csi.org/IMG/pdf/precarious_work_in_the_asian_seafood_global_value_chain.pdf [Accessed on 28 March 2023].
- ^{xlvii} EJF, 2014, Impossibly Cheap: Abuse and Injustice in Bangladesh's Shrimp Industry. Environmental Justice Foundation, London, UK. Available at https://ejfoundation.org/resources/downloads/Impossibly_Cheap_Web.pdf [Accessed on 28 March 2023].
- ^{xlviii} Larive International, 2021, Aquaculture sector study Bangladesh. Available at <https://www.larive.com/wp-content/uploads/2021/06/Aquaculture-Sector-Study-Bangladesh-Opportunities-in-the-aquaculture-sector-in-Bangladesh-RVO.nl-2021.pdf> [Accessed on 28 March 2023].
- ^{xlix} LightCastle Partners, 2022, Bangladesh Shrimp Sector: Transitioning Towards Sustainable Growth. Available at <https://www.lightcastlebd.com/insights/2022/08/bangladesh-shrimp-sector-transitioning-towards-sustainable-growth/> [Accessed on 28 March 2023].

-
- ⁱ Larive International, 2021, Aquaculture sector study Bangladesh. Available at <https://www.larive.com/wp-content/uploads/2021/06/Aquaculture-Sector-Study-Bangladesh-Opportunities-in-the-aquaculture-sector-in-Bangladesh-RVO.nl-2021.pdf> [Accessed on 28 March 2023].
- ⁱⁱ Department of Fisheries, Bangladesh, December 2022, Yearbook of Fishery Statistics 2021-2022. Available at <http://fisheries.portal.gov.bd/site/download/42836060-aa5e-491d-8309-cf750886813b> [Accessed on 23 July 2023].
- ⁱⁱⁱ LightCastle Partners, 2022, Bangladesh Shrimp Sector: Transitioning Towards Sustainable Growth. Available at <https://www.lightcastlebd.com/insights/2022/08/bangladesh-shrimp-sector-transitioning-towards-sustainable-growth/> [Accessed on 28 March 2023].
- ⁱⁱⁱⁱ Larive International, 2021, Aquaculture sector study Bangladesh. Available at <https://www.larive.com/wp-content/uploads/2021/06/Aquaculture-Sector-Study-Bangladesh-Opportunities-in-the-aquaculture-sector-in-Bangladesh-RVO.nl-2021.pdf> [Accessed on 28 March 2023].
- ^{lv} Yearbook of Fishery Statistics 2021-2022, Department of Fisheries, Ministry of Fisheries and Livestock, Government of the People's Republic of Bangladesh. Available at <http://fisheries.portal.gov.bd/site/download/42836060-aa5e-491d-8309-cf750886813b> [Accessed on 23 July 2023].
- ^{lv} Yearbook of Fishery Statistics 2021-2022, Department of Fisheries, Ministry of Fisheries and Livestock, Government of the People's Republic of Bangladesh. Available at <http://fisheries.portal.gov.bd/site/download/42836060-aa5e-491d-8309-cf750886813b> [Accessed on 23 July 2023].
- ^{lvi} Global March, 2021, Mapping and Analysis of Child Labour and Associated Stakeholders in Shrimp Fry Collection in Targeted Upazilas of Bangladesh. Available at: <https://globalmarch.org/mapping-and-analysis-of-child-labour-and-associated-stakeholders-in-shrimp-fry-collection-in-targeted-upazilas-of-bangladesh/> [Accessed on 28 March 2023].
- ^{lvii} LightCastle Partners, 2022, Bangladesh Shrimp Sector: Transitioning Towards Sustainable Growth. Available at <https://www.lightcastlebd.com/insights/2022/08/bangladesh-shrimp-sector-transitioning-towards-sustainable-growth/> [Accessed on 28 March 2023].
- ^{lviii} Yearbook of Fishery Statistics 2021-2022, Department of Fisheries, Ministry of Fisheries and Livestock, Government of the People's Republic of Bangladesh. Available at <http://fisheries.portal.gov.bd/site/download/42836060-aa5e-491d-8309-cf750886813b> [Accessed on 23 July 2023].
- ^{lix} Yearbook of Fishery Statistics 2021-2022, Department of Fisheries, Ministry of Fisheries and Livestock, Government of the People's Republic of Bangladesh. Available at <http://fisheries.portal.gov.bd/site/download/42836060-aa5e-491d-8309-cf750886813b> [Accessed on 23 July 2023].
- ^{lx} Global March, 2021, Mapping and Analysis of Child Labour and Associated Stakeholders in Shrimp Fry Collection in Targeted Upazilas of Bangladesh. Available at: <https://globalmarch.org/mapping-and-analysis-of-child-labour-and-associated-stakeholders-in-shrimp-fry-collection-in-targeted-upazilas-of-bangladesh/> [Accessed on 28 March 2023].
- ^{lxi} Department of Fisheries, Bangladesh, December 2022, Yearbook of Fishery Statistics 2021-2022. Available at <http://fisheries.portal.gov.bd/site/download/42836060-aa5e-491d-8309-cf750886813b> [Accessed on 23 July 2023].
- ^{lxii} The Financial Express, 07 May 2022, 'Shrimp and prawn prospect in BD'. Available at <https://thefinancialexpress.com.bd/views/analysis/shrimp-and-prawn-prospect-in-bd-1651858490> [Accessed on 25 March 2023].
- ^{lxiii} Global Seafood Alliance, 01 April 2006, 'Shrimp farming in Bangladesh'. Available at <https://www.globalseafood.org/advocate/shrimp-farming-in-bangladesh/> [Accessed on 25 March 2023].
- ^{lxiv} The Financial Express, 07 May 2022, 'Shrimp and prawn prospect in BD'. Available at <https://thefinancialexpress.com.bd/views/analysis/shrimp-and-prawn-prospect-in-bd-1651858490> [Accessed on 25 March 2023].
- ^{lxv} EJF, 2014, Impossibly Cheap: Abuse and Injustice in Bangladesh's Shrimp Industry. Environmental Justice Foundation, London, UK. Available at https://ejfoundation.org/resources/downloads/Impossibly_Cheap_Web.pdf [Accessed on 28 March 2023].
- ^{lxvi} EJF, 2014, Impossibly Cheap: Abuse and Injustice in Bangladesh's Shrimp Industry. Environmental Justice Foundation, London, UK. Available at https://ejfoundation.org/resources/downloads/Impossibly_Cheap_Web.pdf [Accessed on 28 March 2023].
- ^{lxvii} Global March, 2021, Mapping and Analysis of Child Labour and Associated Stakeholders in Shrimp Fry Collection in Targeted Upazilas of Bangladesh. Available at <https://globalmarch.org/mapping-and-analysis-of-child-labour-and-associated-stakeholders-in-shrimp-fry-collection-in-targeted-upazilas-of-bangladesh/> [Accessed on 28 March 2023].

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- ^{lxxviii} Global March, 2021, Mapping and Analysis of Child Labour and Associated Stakeholders in Shrimp Fry Collection in Targeted Upazilas of Bangladesh. Available at <https://globalmarch.org/mapping-and-analysis-of-child-labour-and-associated-stakeholders-in-shrimp-fry-collection-in-targeted-upazilas-of-bangladesh/> [Accessed on 28 March 2023].
- ^{lxxix} Business Inspection, 16 June 2021, 'Shrimp Farming in Bangladesh: Why Shrimp Sector is Lagging Behind?' Available at https://businessinspection.com.bd/why-the-shrimp-sector-of-bangladesh-is-lagging-behind/?utm_content=cmp-true [Accessed on 25 March 2023].
- ^{lxxx} The Daily Observer, 01 April 2023, 'Bangladesh approves commercial cultivation of Vannamee shrimp'. Available at <https://www.observerbd.com/news.php?id=413755> [Accessed on 30 July 2023].
- ^{lxxxi} Global March, 2021, Mapping and Analysis of Child Labour and Associated Stakeholders in Shrimp Fry Collection in Targeted Upazilas of Bangladesh. Available at <https://globalmarch.org/mapping-and-analysis-of-child-labour-and-associated-stakeholders-in-shrimp-fry-collection-in-targeted-upazilas-of-bangladesh/> [Accessed on 28 March 2023].
- ^{lxxxii} Global March, 2021, Mapping and Analysis of Child Labour and Associated Stakeholders in Shrimp Fry Collection in Targeted Upazilas of Bangladesh. Available at <https://globalmarch.org/mapping-and-analysis-of-child-labour-and-associated-stakeholders-in-shrimp-fry-collection-in-targeted-upazilas-of-bangladesh/> [Accessed on 28 March 2023].
- ^{lxxxiii} Business Inspection, 16 June 2021, 'Shrimp Farming in Bangladesh: Why Shrimp Sector is Lagging Behind?' Available at https://businessinspection.com.bd/why-the-shrimp-sector-of-bangladesh-is-lagging-behind/?utm_content=cmp-true [Accessed on 25 March 2023].
- ^{lxxxiv} Global March, 2021, Mapping and Analysis of Child Labour and Associated Stakeholders in Shrimp Fry Collection in Targeted Upazilas of Bangladesh. Available at <https://globalmarch.org/mapping-and-analysis-of-child-labour-and-associated-stakeholders-in-shrimp-fry-collection-in-targeted-upazilas-of-bangladesh/>
- ^{lxxxv} ITUC, 2016, Precarious Work in the Asian Seafood Global Value Chain. Available at https://www.ituc-csi.org/IMG/pdf/precarius_work_in_the_asian_seafood_global_value_chain.pdf [Accessed on 28 March 2023].
- ^{lxxxvi} Business Inspection, 17 April 2022, 'Bangladesh's Shrimp Export Rises After Years of Decline'. Available at https://businessinspection.com.bd/bangladeshs-shrimp-export-rises/?utm_content=cmp-true [Accessed on 09 November 2022].
- ^{lxxxvii} European Commission Information Management System for Official Controls. Available at https://webgate.ec.europa.eu/tracesnt/directory/publication/establishment/index#!/search?classificationSectionId=FISHERY_PRODUCTS&classificationSectionChapter=food&countryCode=BD&sort=country.translation [Accessed on 25 March 2023].
- ^{lxxxviii} Department of Fisheries, Bangladesh, December 2022, Yearbook of Fishery Statistics 2021-2022. Available at <http://fisheries.portal.gov.bd/site/download/42836060-aa5e-491d-8309-cf750886813b> [Accessed on 23 July 2023].
- ^{lxxxix} Shrimp Insights, 16 December 2020, 'Black Tiger Shrimp: Mainstream Turned Niche'. Available at <https://shrimpsights.com/blog/black-tiger-shrimp-mainstream-turned-niche> [Accessed on 17 March 2023].
- ^{lxxxx} United Nations, 2023, UN Comtrade Database, 2023. Available at <https://comtradeplus.un.org/> [Accessed on 25 March 2023].
- ^{lxxxxi} Shrimp Insights, 16 December 2020, 'Black Tiger Shrimp: Mainstream Turned Niche'. Available at: <https://shrimpsights.com/blog/black-tiger-shrimp-mainstream-turned-niche> [Accessed on 17 March 2023].