Warmwater shrimp social risk profile

Forced labor, human trafficking, and hazardous child labor risks

Indonesia, Aquaculture and Processing

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SEAFOOD SOCIAL RISK TOOL V2

Contents

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

Indonesia was the fourth largest producer of shrimp and prawn in 2024[i], and is one of the top shrimp exporting countries by volume alongside Ecuador, India, and Vietnam.[ii] Indonesia produces a variety of aquaculture commodities. Shrimp is the main aquaculture commodity by production value[iii] and seaweed is the main commodity by production volume.[iv] Other significant aquaculture commodities include tilapia, catfish, and milkfish.[v,vi] Domestic demand for shrimp accounts for around 40% of total production.[vii] Nevertheless, shrimp is one of the country's leading export products, contributing approximately 40% to Indonesia's seafood export value. In 2022, over half of the shrimp export volume was exported to the United States, followed by Japan, China, and Malaysia, which jointly comprised more than 30% of the export volume, with the remainder made up by other ASEAN countries and the European Union.[viii,ix] An estimated 3.3 million people were directly involved in aquaculture in Indonesia in 2019[x] and this figure has been projected to increase up to 8.9 million by the 2030's.[xi]

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

The overall context in Indonesia is not favorable toward the protection of workers. Significant risk factors include a regulatory focus on protecting Indonesian workers overseas that overlooks vulnerable workers in Indonesia, gaps in the legal framework addressing child labor and forced labor, limited capacity for enforcement combined with the remoteness of some areas and a high level of informal employment in the workforce, and barriers to workers organizing.

Indonesia is primarily a source rather than a destination country for migrant workers, and the Indonesian government has focused its efforts to address human trafficking and forced labor on protecting Indonesian workers abroad.[xii] However, internal migration is significant and Indonesia is playing an increasingly greater role as a transit and destination country for foreign migrant workers.[xiii,xiv] While there are some protections in place for foreign migrant workers, who are technically afforded equal rights without discrimination[xv], discrimination persists and public acceptance of foreign migrant workers in Indonesia is poor.[xvi,xvii] Less attention has been given to protecting foreign migrant workers in Indonesia[xviii], and Indonesian workers who are vulnerable to forced labor within Indonesia, such as domestic workers, home workers, plantation workers, and fishers, have been overlooked.[xix] The International Labour Organization recommends that the government consider ratifying the Protocol to the Forced Labour Convention, 1930 (PO29) to increase protections for local workers.[xx]

Gaps in Indonesia's legal framework undermine protections for children from the worst forms of child labor and overall, enforcement of child labor, forced labor, and anti-trafficking laws is ineffective.[xxi, xxii] As noted above, Indonesia has not yet ratified P029. Forced labor is not criminalized as a specific offence unless it is part of a human trafficking prosecution. As a result, forced labor abuses are often managed through dispute settlement systems and perpetrators go unpunished.[xxiii] Enforcement is hampered by limited resources, including an insufficient number of labor inspectors for the size of the total workforce.[xxiv] The limited capacity within the labor inspectorate is likely further affected by the remoteness of some regions. Workers employed in the informal sector, which is estimated to include 57% of the labor force, lack formal contracts and do not receive the same protections and benefits compared to workers in the formal sector.[xxv] Furthermore, corruption and official complicity in human trafficking crimes remains a serious concern.[xxvi] More generally, official corruption is perceived to be widespread. Bribes and extortion are used to influence civil and criminal cases, and efforts to address corruption are undermined by others in the justice system.[xxvii]

While the law provides for workers' rights to join unions, conduct legal strikes, and bargain collectively, in practice, these rights are restricted and are not respected.[xxviii,xxix] Workers are subject to anti-union discrimination, and in some cases, intimidation in the form of dismissal, transfer, and even seemingly unjust criminal charges.[xxx,xxxi] Judicial corruption in workers' disputes has also been reported.[xxxii]

Since 2020, changes to national legislation have prompted further concerns regarding protections for workers, while demonstrating the collective power of Indonesian trade unions to influence labor legislation. In October 2020, Law No. 11 of 2020 on Job Creation known as the "Omnibus Law" was passed to widespread criticism for its potential impacts on business, labor, and environmental legislation, prompting mass demonstrations around the country.[xxxiii] The law included provisions that would affect wages and other working conditions and worker protections, as well as environmental standards for business. Among others, the International Trade Union Confederation, and its Indonesian affiliates, KSBSI and KSPI, strongly opposed the new law, calling it an "assault on the UN Sustainable Development Goals (SDGs) by the Indonesian Government".[xxxiv,xxxv] The Omnibus Law was declared unconstitutional in November 2021 by the Indonesian Constitutional Court, which suspended its most harmful provisions immediately and gave the Indonesian government two years to repair it.[xxxvi] However, in December 2022 the President signed an emergency regulation replacing the Omnibus Law,[xxxvii] which passed into law in March 2023.[xxxviii] The new Law No. 6 of 2023 effectively resurrected the 2020 Omnibus Law as it contained similar provisions.[xxxix] This prompted further opposition by Indonesian trade unions who filed a judicial review petition that called for amendments to the law. In October 2024, the Indonesian Constitutional Court partially upheld the petition and ruled that the government must develop a new employment law.[xl] Developments are expected to be reported by ITUC Asia Pacific.

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

The narrative around human trafficking and forced labor in fishing in Indonesia is dominated by human rights abuses conducted on foreign fishing vessels operating in Indonesian waters or against Indonesian migrant fishers working on foreign vessels overseas. In contrast, limited information is available about human rights abuses in Indonesia's seafood industry, though there is some evidence linking the country's fishing and seafood processing industries to forced labor and hazardous child labor. No direct evidence of forced labor, human trafficking, or hazardous child labor was found in shrimp production and processing. However, evidence indicative of forced labor was found in both shrimp aquaculture and processing that highlights the risk of forced labor in these sectors. In addition, there are some concerns about recent national policy developments that could affect traditional shrimp farmers as well as shrimp farmers' apparent dependence on intermediaries. Risks related to production of shrimp aquaculture feed inputs are outside the scope of this assessment.

The risks of forced labor, human trafficking, and hazardous child labor in Indonesia's seafood industry are documented in detail in the SSRT's tropical tuna risk profile[xli]. Indonesia's seafood industry is characterized by high levels of informality in recruitment practices and contracting, and low levels of unionization and awareness of workers' rights, which increase the risk of forced labor.[xlii] Risk factors identified in Indonesia's tropical tuna industry include the recruitment of fishers by intermediary labor brokers who charge fishers excessive fees and provide cash advances, which has the potential to result in debt bondage.[xliii] Risk factors identified in tropical tuna processing include the use of precarious short, fixed-term contracts and payment of wages below the minimum legal wage for processing workers.[xliv] In March 2025, four Indonesian tuna fishers filed a suit in California against a US seafood company claiming to have been subjected to human trafficking and forced labor on fishing vessels linked to the company's supply chain. This represents the first time a case has been brought against a US seafood company for forced labor on fishing vessels.[xlv] Conditions identified in tropical tuna supply chains and other parts of the seafood industry, particularly in fishing, are not necessarily an indication that similar abuses occur in shrimp aquaculture, but they do indicate a heightened risk in the country's seafood industry overall.

Historically, the development of the shrimp farming industry in Indonesia was associated with reports of human rights abuses such as child labor, land conflicts and seizures, and other negative socioeconomic impacts.[xlvi] The Nucleus Estate Smallholder's Scheme, which involved companies establishing loan agreements with smallholders led to farmers becoming trapped in cycles of poverty and debt because of unfavorable price-setting by the companies.[xlvii] In addition, smallholders' movements were restricted by the companies who only allowed the smallholders to

leave their farm for a few days per year, with the smallholders at risk of penalties for late returns.[xlviii] The scheme prompted conflicts between smallholders and companies, with protests by shrimp farmers resulting in imprisonment and death.[xlix,l] It is unclear whether the scheme is still being used in Indonesia's shrimp industry, but there is some evidence indicating that in certain shrimp farming areas there is a dependence on companies by smallholder farms.[li] However, similar malpractices have not been reported. In 2021, the media reported on the Ministry of Maritime Affairs and Fisheries (MMAF) launching the "nucleus estate scheme", which involves shrimp clusters and farming programs for young entrepreneurs, aiming to improve raw materials supplies to processing plants.[lii] Articles suggest that the new scheme will differ from the earlier Nucleus Estate Smallholder's Scheme[liii], although there are also concerns about how this will impact traditional farmers as well as natural and rehabilitated coastal environments.[liv]

The shrimp supply chain is spread throughout the archipelago, resulting in a high dependency on intermediaries and limited traceability. Shrimp farmers rely strongly on intermediaries for access to financial capital, which leaves them at risk of unsustainable debt situations in case of crop failures. A 2020 report by the International Labour Organization and Monterey Bay Aquarium indicates no evidence of structural debt bondage was found, as shrimp farmers can sell their harvest to the buyer of their choice. However, a 2024 report by three Indonesian non-government organizations alleges the presence of several indicators of forced labor on shrimp farms and in shrimp peeling, including debt bondage linked to loan providers.[lv, lvi]

Other reported indicators of forced labor in the shrimp industry include abuse of vulnerability, deception in recruitment processes, withholding of wages, restriction of movement, isolation and excessive overtime, and threats and intimidation, including against workers expressing grievances through a trade union.[lvii] In addition, children aged between 10-15 years have been reported to assist with shrimp feeding and peeling activities.[lviii] Separately, there have been reports of exploitative practices in the seafood and shrimp processing industries, involving workers being subjected to excessive working hours, involuntary and unpaid overtime, and pregnancy tests among others.[lix,lx,lxi] Women, who make up the majority of shrimp processing workers, are reported to be vulnerable and exposed to unsafe working conditions and health hazards.[lxii]

The Indonesian government is involved in improving conditions in the aquaculture industry through projects such as the 'Infrastructure Improvement for Shrimp Aquaculture Project'.[lxiii] This project includes operational priorities on topics such as addressing poverty and reducing inequality, gender equality, and rural development and food security, and aims to increase the contribution of the fisheries industry to the national economy under the national Medium-Term National Development Plan 2020-2024.[lxiv,lxv]

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

Country-level indicators
• Men, women, and children are exploited by traffickers across Indonesia in several industries including domestic' servitude, agriculture, construction, mining, and manufacturing. Women and girls are also exploited by sex traffickers. • Goods identified as produced by child labor or forced labor include gold, nickel, palm fruit, rubber, sandals, tin, and tobacco. In addition, multiple palm oil products are thought to be made with palm fruit produced using child labor or forced labor.
Seafood industry-level Indicators
• Labor traffickers exploit workers in fishing and fish processing in Indonesia. • Fish from Indonesia is identified as a good produced by child labor and forced labor. • Fishing and fish processing in Indonesia have also been linked to hazardous child labor and forced child labor. • Indonesia is the main destination of almost half of the migrant fishers trafficked from Thailand, Cambodia, and Vietnam. • In addition to the evidence summarized above of human trafficking, forced labor and hazardous child labor in Indonesia's seafood industry, there are many reports documenting the abuse of Indonesian migrant workers on foreign fishing vessels operating overseas as well as foreign and Indonesian fishers working on board foreign fishing vessels operating in Indonesian waters.
Aquaculture indicators
• No evidence was found linking Indonesia's shrimp aquaculture industry directly to forced labor, hazardous child labor, and human trafficking or to indicators of forced labor and hazardous child labor. • However, indicators of forced labor in shrimp aquaculture were found by a 2024 study by Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM that reported abuse of vulnerability, deception in recruitment processes, withholding of wages, debt bondage, restriction of movement, isolation and excessive overtime, and threats and intimidation. • In addition, there is evidence of potentially hazardous child labor wherein workers' children aged between 10-15 years have been reported helping with shrimp feeding activities.

Processing indicators

- No evidence was found linking Indonesia's shrimp processing industry directly to human trafficking, or hazardous child labor.
- However, there are indicators of forced labor in the shrimp processing industry, including excessive working hours, wage withholding, and verbal abuse, but some of this evidence is from 2018.
- More recent evidence published in 2024 is potentially indicative of abusive working conditions, wherein processing workers are exposed to occupational health and safety concerns and in some facilities must purchase their own protective gear.
- There is also evidence of potentially hazardous child labor, wherein workers' children aged between 10-15 years have been reported to assist with shrimp peeling activities.

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 performance against the SSRT indicators for governance practices and systems, particularly for corruption.
- Low respect for workers' rights and frequent reports of union-busting measures and systematic dismissal of workers attempting to form a union.
- An increasing role as a transit and destination country for vulnerable, displaced people and asylum seekers over the last several decades.
- Government efforts are focused on protecting Indonesian migrant workers overseas, with less emphasis on protecting foreign and internal migrant workers in Indonesia.
- The October 2020 "Omnibus Law" and subsequent efforts by the government to resurrect it have been widely criticized for jeopardizing labor rights. Following a ruling in October 2024 by the Indonesian Constitutional Court, the government must develop a new employment law, the impact of which is yet to be seen.
- Enforcement of human trafficking, forced labor, and child labor laws is ineffective.
- Forced or compulsory labor as a specific offence is not criminalized unless it is prosecuted as human trafficking.
- Forced labor violations are often managed through dispute settlement systems, leaving perpetrators unpunished.

Seafood industry-level indicators

- Difficulties in monitoring and enforcing fisheries regulations across Indonesia's extensive coastline and remote islands.
- Weakened efforts to address the parallel issue of illegal, unreported, and unregulated fishing following changes in fisheries governance in 2019.
- Limited implementation and enforcement of the legal framework to protect fishers and seafood processing workers.
- Low levels of organization of workers in the seafood industry and limited access to grievance mechanisms, coupled with anti-union discrimination.
- Forced labor concerns for domestic commercial fishers tend to be overlooked as the focus is on Indonesian migrant fishers overseas.
- Regulatory protections for fishers working in Indonesian waters and on vessels flagged to Indonesia need to be strengthened.
- The capability of the Ministry of Marine Affairs and Fisheries and the Ministry of Manpower to carry out joint labor inspections on fishing vessels needs to be improved.

Aquaculture indicators

- There is a high dependency on supply chain intermediaries that could put farmers at risk of indebtedness.
- Data on working conditions in the shrimp aquaculture industry is limited, although a recent 2024 report by Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM suggests high levels of informal employment arrangements, which increases the risk of labor abuse.
- Low wages expose workers to the risk of debt bondage through either through taking out loans from banks or "loan sharks" or asking for advanced payments.

Processing indicators

- Most of the shrimp supply chain is not vertically integrated and relies on intermediaries to provide raw material inputs to processing plants.
- Most workers in shrimp processing are women and gender-based discrimination has been reported as well as the use of mandatory pregnancy tests.
- A 2024 study by Freedom Fund on 60 seafood processing workers in Indonesia, including workers in shrimp processing facilities, found that workers have low levels of education, are employed informally on a piece-rate basis, and lack access to benefits like subsidized accident and health insurance.
- Workplace safety is a concern with frequent reports of hand injuries, and in some facilities, workers had to purchase their own personal protective equipment.
- Workers are reported to have to work overtime to meet minimum wage levels.

Factors that decrease the likelihood

Country-level indicators
• Declining poverty rate over the last decade and progress against indicators for health and education. • Party to the Port State Measures Agreement, which targets illegal, unreported, and unregulated fishing. • Foreign workers are entitled to change their employer or occupation. • Foreign workers and their families are afforded access to social protection, health care, and education. • Establishment of the National Action Plan for Human Rights 2021–2025, which is in line with the United Nations' Sustainable Development Goals. • The Indonesian government has made significant efforts over the past decades to eliminate child labor through implementing policies, capacity building initiatives, direct interventions and collaborations.
Seafood industry-level indicators
• Indonesia has made significant efforts to tackle illegal, unregulated, and unreported fishing by foreign vessels since 2014. • Indonesia is among a handful of countries to have implemented vessel transparency by publishing Vessel Monitoring System (VMS) data showing the activity of its commercial fleet on the public online platform Global Fishing Watch. • Indonesian flagged vessels operating in Indonesian waters are prohibited from hiring foreign nationals as captain or crew. • Indonesia has established several regulations intended to help protect fishers, including Ministerial Regulation No.42/2016 on work agreements and Ministerial Regulation No. 2/2017, which establishes a certification mechanism for human rights on fishing boats. • Over the past eight to ten years there has been a significant increase in both direct and indirect external funding supporting fishers through programs such as the Safe Seas Project, the ILO's Ship to Shore Rights Project, and the Freedom Fund providing training support, legal assistance, and organizational capacity building supporting organization of fishers. • Third party certifications for farmed and wild-caught seafood containing social components to various degrees are present in Indonesia. Schemes present include Aquaculture Stewardship Council, Best Aquaculture Practices, and Fairtrade USA.

Aquaculture indicators
• Most of the Indonesian shrimp aquaculture industry are small-scale family operated businesses, where hired labor is low. • A 2020 report by the International Labour Organization and Monterey Bay Aquarium suggests that while there is a dependency on intermediaries for access to financial capital, farmers retain the ability to choose their own buyer and are not forced to sell to the loan provider.
Processing indicators
• A large share of shrimp is produced for export, offering a point of leverage for buyers to drive improvements in production. • A 2024 report by Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM found that workers in the final processing/exporters segment had formal employment arrangements, such as contracts, and were covered by government labor laws and social security.

Aquaculture

An estimated 3.3 million people were directly involved in fish and shrimp aquaculture in Indonesia in 2019, with most of these farmers being small holder family businesses.[lxvi] Aquaculture production is primarily conducted by men. The August 2021 National Statistics shows that out of 409,939 aquaculture business account (*KUSUKA*) owners surveyed, 57,102 (13.9%) were women and 352,737 (86.1%) were men.[lxvii] According to national aquaculture production statistics on volume and value, seaweed is the main commodity by volume, accounting for 62% (9 million tons) of total aquaculture production volume in 2022.[lxviii] Shrimp, which only constitutes 6% of total aquaculture production volume, is the main commodity by value accounting for 29% (US$8.07 billion) of aquaculture production value in 2022.[lxix] Other important aquaculture commodities beside shrimp and seaweed in Indonesia are tilapia, catfish, milkfish, Eurasian carp, and pangasius among other.[lxx,lxxi]

Shrimp production is spread over 34 provinces throughout the archipelago, with 12 provinces responsible for 93% of total production. According to national statistics, important shrimp-producing provinces are Nusa Tengara West, West Java, and East Java, which were responsible for 18%, 16%, and 11%, respectively, of the total production in 2020.[lxxii] Other sources also mention Sumatra, South Sulawesi, Lampung and Kalimantan.[lxxiii,lxxiv] According to FAO figures, over 941,000 metric tons (Mt) of shrimp was produced in 2021, of which 80% was whiteleg shrimp (*Litopenaeus vannamei*), 15% was giant tiger shrimp (*Penaeus monodon*), and the remainder consisted of *Fenneropenaeus* species and *Metapenaeus* species 'not further identified'.[lxxv] But, shrimp

associations have questioned the accuracy of official production figures for farmed shrimp and industry estimates based on feed usage and the amount of raw material processed are about half the reported volume between 400,000 and 500,000 Mt, .[lxxvi,lxxvii] It is unclear what causes the discrepancy. Whiteleg shrimp is predominantly cultured in semi-intensive to intensive systems, while extensive monoculture and polyculture systems with milkfish or seaweed are used for giant tiger shrimp.[lxxviii,lxxix] An area of approximately 679,448 hectares (ha) is reported to be in use for shrimp production, of which over 90% is used for extensive production[lxxx], although other sources indicate an estimate of 300,000 ha of which 82% is used extensive culture, 15% for semi-intensive and the remainder intensive farms.[lxxxi] Extensive production contributes less than one-fifth to total shrimp production volumes, with semi-intensive and intensive production contributing over 50% and 30% respectively.[lxxxii,lxxxiii] Productivity per production systems is estimated to be 30 tons/ha per year for intensive, 10 tons/ha per year for semi-intensive, and 0.6 tons/ha per year for traditional/extensive systems[lxxxiv], although non-official sources report this to be lower.[lxxxv] The actual number of shrimp farms in operation is not clear as not all are producing on a commercial scale, but the figure is estimated to be between 80,000 to 95,000 farms.[lxxxvi] Around 80% of these farms cultivate giant tiger shrimp.[lxxxvii] It is estimated that 70% of the farms are small holders and 30% are owned by large companies.[lxxxviii]

Shrimp hatcheries are spread over the islands to allow for a stable supply in each region. By law, Indonesian hatcheries must be certified, and the sector is highly regulated. Most post-larvae comes from large and midsize hatcheries that supply around 80% of the farms.[lxxxix] An older source from 2009 indicates that there were 13 giant tiger shrimp backyard hatchery farmers spread over Lampung, Central Java, East Kalimantan, South Sulawesi and East Java and 500 whiteleg shrimp backyard hatchery farmers concentrated in East Java.[xc] It is not clear to what extent backyard hatcheries are still being used. Around 40% to 50% of the hatcheries are controlled by one company (CP Prima).[xci]

In Indonesia's National Medium-Term Development Plan (RPJMN) for 2020–2024, the Indonesian government sought to boost its economy by 5.4% by 2024, and included plans to increase shrimp production, and boost shrimp exports by 250% by 2024 through the Major Farm Revitalization Project in Shrimp and Milkfish Production Hubs.[xcii] According to WorldFish, with the projected growth in aquaculture around 8.9 million full-time jobs in production would be created by 2030.[xciii] The project targets seven provinces, Lampung, Banten, Central Java, East Java, South Sulawesi, Bali and Nangro Aceh Darusalam.[xciv]

As shrimp production is generally not located in major processing hubs, shrimp farmers rely heavily on intermediary actors to connect them with feed mills, hatcheries, and processors.[xcv] Middlemen are reported to take 1.4% to 5% of farmers' profits each.[xcvi]

Processing and Trade

There are only a couple of fully integrated shrimp companies in Indonesia, and some partially integrated companies that own their own farms. Most shrimp processors generally do not have direct access to farmers, and many are reliant on intermediaries to source their raw material.[xcvii] Geography adds complexity and cost to the supply chain as most shrimp processors are located on Java and other big cities in Indonesia, which is far away from the major shrimp production areas and inter-island transportation is not very efficient.[xcviii]

According to the MMAF, there are a total of 773 large and medium seafood processing plants in Indonesia, although this does not include the estimated 62 thousand small scale and micro (home based) seafood processers.[xcix] In terms of shrimp processing, the Indonesia Seafood Processors and Exporters association reports that there are around 100 medium and large shrimp processing plants, with a processing capacity of 500,000 tons of raw material per annum. However, generally processors only work at 60% to 75% of their installed capacity.[c] Up to November 2023, there were 173 fishery product establishments that have approved export licenses to the EU, of which 95 are also approved for aquaculture products.[ci]

Between 2016 to 2020, shrimp accounted for around 35-40% of Indonesia's total fishery export value.[cii] According to the UN Comtrade Database, Indonesia's shrimp exports amounted to 187,000 tons, worth US$ 1.64 billion in 2022[ciii], although other sources report volumes of above 200,000 tons.[civ] The United States is the largest importer of Indonesian shrimp, accounting for 54% of the volumes exported, followed by Japan (14%), China (14%), Malaysia (6%), and other Asian and European countries.[cv] Besides exports, Indonesia also has a large domestic market for shrimp, with multiple sources estimating this to be around 40% of total production.[cvi,cvii]

Due Diligence for Warmwater shrimp in Indonesia

Important Country-Specific Considerations

- Gaps in Indonesia's legal framework, limited resources, including human resources, in the labor inspectorate, official corruption, and the remoteness of some regions hamper the enforcement of child labor, forced labor, and anti-trafficking laws.
- The shrimp supply chain is fragmented and spread across the archipelagic nation. Many farmers are small-scale producers and rely on intermediary supply chain actors.
- A large share of shrimp is produced for export, offering a point of leverage for buyers to drive improvements in production, with around 50% of shrimp exports destined for the US.

Suggested Due Diligence Priorities & Questions

Worker demographics Little information is known about workers in warmwater shrimp aquaculture and processing, other than women appearing to make up most of the workforce in shrimp processing.
1. What proportion of workers are employed in low-skilled, low pay roles in shrimp farming? 2. What is the proportion of young workers (15-18 years old) in the shrimp farming workforce? What protocols are in place to protect young workers from workplace hazards? 3. What is the proportion of temporary and contract workers versus permanent workers employed in shrimp processing?

Complaints mechanisms Unionization levels are low in Indonesia's seafood industry. Workers that try to organize experience anti-union discrimination and risk dismissal resulting in negative perceptions of organizing. Access to formal grievance mechanisms is limited and seafood workers may avoid submitting complaints for fear of repercussions.
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?
4. Are workers who submit complaints protected against adverse repercussions?

Contracts, working hours and compensation

Workers in shrimp production and processing facilities are often employed informally. Compensation has been reported to be below minimum wage, paid on a piece-rate basis (in the case of processing), and workers lack access to benefits from permanent employment like subsidized accident and health insurance. Lack of adequate compensation, piece-rate pay systems, and a lack of health insurance may compel workers to work excessive hours or to work when ill to maintain an adequate income and may encourage children to work to support the family income. Some workers are required to stay onsite during standby periods.

1. Are workers employed using a formal contract written in a language that they understand?
2. Are workers paid at least the minimum wage according to state or sector requirements? Are they required to meet performance targets to earn that minimum wage?
3. How are working hours, overtime, and rest periods monitored for all workers?
4. Do workers receive a pay slip and are they aware of wage-setting mechanisms?
5. Are all workers given social security benefits such as subsidized accident and health insurance?
6. What facilities are available to workers that are required to stay on site during standby periods or who live onsite to communicate externally, for example with their friends and families?

Processing activities

Most of Indonesia's shrimp supply chain is not vertically integrated. The supply chain includes thousands of shrimp farms, with the majority being small-scale producers, that are spread widely over multiple islands and away from major processing hubs. This means that shrimp farmers and processors rely heavily on intermediary actors to connect them and increases the opacity of the supply chain.

1. Is there traceability back to the farm, and does the company know what working conditions are like on the farm?
2. Do processing companies have established agreements with certain intermediaries or agents that purchase or transport shrimp from farms?
3. Do processors include conditions on loans, prices, etc. in their agreements with intermediaries?

Indonesia: Country-level indicators

Indicator	Description	Sources
Poverty levels in a country	Human Development Index HDI Value (2022): 0.713 HDI Rank (2022): 112 Indonesia's HDI value for 2022 places it in the 'high human development' category and positions it at 112 out of 193 countries and territories. Indonesia's HDI value for 2022 is below the average of 0.764 for countries in the high human development group and below the average of 0.766 for countries in East Asia and the Pacific. Indonesia shows progress against each of the HDI indicators for income, health, and education from 1990 to 2022. However, when Indonesia's HDI value is discounted for inequality, it falls to 0.588, a loss of 17.5% due to inequality in the distribution of the HDI dimension indices. The average loss due to inequality for high HDI countries is 17.8% and for East Asia and the Pacific it is 16.4%.	UNDP Human Development Index (HDI) UNDP Global Human Development Indicators Country Profile: Indonesia
	Poverty headcount ratio at national poverty line (% of population): 9.4% (2023), showing decreases from previous years back to 10.0% in 2021. The poverty headcount ratio is lower than neighboring countries Philippines, Papua New Guinea, and Timor-Leste, while being higher than neighboring country Malaysia: • Philippines: 18.1% (2022) • Malaysia: 6.2% (2021) • Papua New Guinea: 39.9% (2009) • Timor-Leste: 41.8% (2014) • Singapore: no data	World Bank

Indicator	Description	Sources
	• Australia: no data	
	Global Hunger Index (2024): Indonesia ranks 77th out of 127 qualifying countries. With a score of 16.9 out of 100, Indonesia suffers from a level of hunger that is 'moderate'. Indonesia performs worse than neighboring countries Malaysia, and the Philippines, while better than Timor-Leste and Papua New Guinea. • Philippines: 14.4 • Malaysia: 12.7 • Singapore: no data • Australia: no data • Papua New Guinea: 28.8 • Timor-Leste: 27.0 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').	Global Hunger Index (GHI)
Country's position in the regional economic power system	Comparing HDI ranking to other countries in the region **Indonesia** • HDI Value (2022): 0.713 • HDI Rank (2022): 112 (high human development) Indonesia's HDI is lower than neighboring countries Malaysia, Singapore, and Australia, but higher than Papua New Guinea, Philippines and Timor-Leste. Neighboring Countries: **Malaysia** HDI Value (2022): 0.807 HDI rank (2022): 63	UNDP Human Development Index (HDI) UNDP Global Human Development Indicators Country Profile:

Indicator	Description	Sources
	The Philippines HDI Value (2022): 0.710 HDI rank (2022): 113 **Singapore** HDI Value (2022): 0.949 HDI rank (2022): 9 **Australia** HDI Value (2022): 0.946 HDI rank (2022): 10 **Papua New Guinea** HDI Value (2022): 0.568 HDI rank (2022): 154 **Timor-Leste** HDI Value (2022): 0.566 HDI rank (2022): 155	
	Comparing its recent economic growth to the general economic growth rates in the region In July 2020, the World Bank assigned Indonesia to a higher income group, moving the country from the lower-middle income category to the upper-middle income category. **Indonesia** GDP Growth (annual %): 5.3 (2022) Indonesia's GDP growth is higher than neighboring countries, Australia, Singapore, Timor-Leste and Papua New Guinea, but lower than neighboring countries Malaysia, and the Philippines. Neighboring countries: **The Philippines**	World Bank Databank figures on annual economic growth

Indicator	Description	Sources
	GDP Growth (annual %): 7.6 (2022) **Malaysia** GDP Growth (annual %): 8.7 (2022) **Australia** GDP Growth (annual %): 4.3 (2022) **Singapore** GDP Growth (annual %): 3.6 (2022) **Papua New Guinea** GDP Growth (annual %): 5.2 (2022) **Timor-Leste** GDP Growth (annual %): -20.5 (2022)	
	Migration data Net migration rate (immigrants minus emigrants per 1,000 population) for Indonesia is: 0.1 (2021).	IOM Migration Data Portal.
	Regional migration trends and patterns Indonesia has primarily been a source country for migrant workers, with workers migrating to countries within the Asia-Pacific and beyond. Nevertheless, Indonesia has also played an increasingly greater role as a transit and destination country for migrant workers in recent years. Migration Policy Institute, 2018 Internal migration plays a significant role in Indonesian migration patterns, with the country spanning some 17,000 islands. Labor migration to other countries has also grown in importance, when the Indonesian government started to actively encourage overseas labor migration in the 1970's. An estimated 7% of the Indonesian labor force worked overseas in 2016. True numbers of labor emigrants	Migration Policy Institute, 2018, 'Indonesia: A Country Grappling with Migrant Protection at Home and Abroad' OECD, 2022, A Review of Indonesian Emigrants, Talent Abroad, OECD Publishing, Paris ILO, 2024, New PROTECT project supports women

Indicator	Description	Sources
	are unknown due to the lack of a central authority to compile data and the irregular employment of many workers. Historically, the Indonesian Government failed to set up workers to expect good treatment in overseas employment, but it has taken progressively stronger action to protect overseas workers in the last two decades, even suspending recruitment to some countries where workers have experienced poor treatment. Migration Policy Institute, 2018 Outward migration has been characterized by temporary low-skilled labor migration to countries in Southeast Asia and the Middle East. The annual number of Indonesian migrant workers working overseas declined significantly from 645,000 in 2008 to 276,500 in 2019. This decline was mainly caused by bans imposed by the Indonesian government in the early 2010s on sending migrant workers to Middle Eastern countries following concerns about labor exploitation of Indonesian migrant women in those countries. Women accounted for 70% of Indonesian migrant workers overseas in 2019. The number of Indonesian migrant workers placed overseas decreased further to 113,000 in 2020 because of the COVID-19 pandemic. OECD, 2022 The number of registered placements of Indonesian migrant workers reached 274,965 in 2023, which is the same level as before the COVID 19 pandemic. IOM Indonesia, 2024 Nearly two-thirds (61%) of these migrant workers are women working in informal sectors. These women seek employment in domestic work, care work, agriculture, plantation and manufacturing industries in Hong Kong, Taiwan, and Malaysia. Particularly in Malaysia, a considerable number of Indonesian migrants are migrating through irregular channels. Women migrant workers are more likely to end up in informal sectors. ILO, 2024	migrant workers and children in Indonesia United Nations Indonesia, 2024, Two Years of Progress: Indonesia advances Migration Governance for Sustainable Development International Organization for Migration (IOM), 2024, IOM INDONESIA - 2023 YEAR IN REVIEW

Indicator	Description	Sources
	Immigration into Indonesia for work is restricted by government policies that only authorize employment of foreigners in jobs that require skills and qualifications not commonly found in the Indonesian labor force. The top reported countries of origin for migrant workers in 2016 were China, Japan, South Korea, India, and Malaysia, with China representing nearly 30% of immigrants issued with work permits that year. Indonesia also receives unauthorized foreign workers, mainly from China. In 2015, over 1,000 unauthorized workers from countries in South-East Asia were identified after having been trafficked into work in fishing on board foreign-flagged vessels and stranded in remote parts of Indonesia. Indonesia is also a recipient of displaced peoples and asylum seekers. The country's extensive coastline makes unofficial entry into the country easier. Asylum seekers come from countries including Vietnam, Myanmar, and Sri Lanka. Asylum seekers also use Indonesia as a transit point for Australia, although the number of people attempting the journey between the countries has declined since 2013 because of policies put in place by Australia to deter asylum seekers. Migration Policy Institute, 2018 In 2023 there was a surge in Rohingya refugees arriving in Indonesia and a concerning increase in numbers of individuals becoming victim to trafficking in persons through online scams. IOM Indonesia, 2024	
	Known human trafficking routes The Freedom Collaborative Victim Journeys Map identifies known human trafficking routes within Indonesia as well as Indonesia to Malaysia, Singapore, Saudia Arabia, Taiwan, Hongkong, United Arab	Freedom Collaborative, No date, Mapping Risky Migration Journeys Globally

Indicator	Description	Sources
	Emirates, Brunei, Turkey and South Africa. Freedom Collaborative According to the US Department of State's 2024 Trafficking in Persons Report, each of Indonesia's provinces is a source and destination of trafficking. Traffickers exploit Indonesian and foreign victims in Indonesia, and Indonesians abroad. Foreign victims include workers from China and North Korea, and Rohingya refugees. The report identifies Asia and the Middle East as destinations for trafficked Indonesian workers. Additionally, Indonesian workers are trafficked onto fishing vessels. US Department of State, 2024	US Department of State, 2024 Trafficking in Persons (TIP) Report
Governance practices and systems in a country (measured through indexes)	WGI (2023) Percentile rank: • Voice and Accountability: 52.45 • Political Stability and Absence of Violence: 28.91 • Government Effectiveness: 69.81 • Regulatory Quality: 60.85 • Rule of Law: 46.70 • Control of Corruption: 36.32 Indonesia ranks in the lower percentiles for three indicators, 'Political Stability and Absence of Violence', 'Rule of Law' and 'Control of Corruption'. Indonesia ranks closely to the regional average for East Asia and Pacific for most of the indicators but ranks considerably lower than the regional average for 'Political Stability and Absence of Violence/Terrorism', for which East Asia and Pacific has a percentile rank of 68.59. Note: Percentile rank among all countries ranges from 0 (lowest) to 100 (highest) rank, where the higher the percentiles, the better the governance.	World Governance Indicators (WGI)

Indicator	Description	Sources
	Corruption Perception Index (2023): Score: 34/100 Rank: 115/180 countries More than two-thirds of countries score below 50 in the 2023 index, with an average score of just 43. Indonesia's score of 34 and positions it 115th out of 180 countries and territories. Indonesia scores less than the regional average for Asia Pacific. **Neighboring countries** • Malaysia: 50/100 • Singapore: 83/100 • Philippines: 34/100 • Australia: 75/100 • Papua New Guinea: 29/100 • Timor-Leste: 43/100 Average score for the Asia Pacific region: 45/100 Note: Based on 0 = Highly Corrupt, 100 = Very Clean.	Transparency International Corruption Perception Index (CPI)
	Basel Anti-Money Laundering Index (2024): Rank: 78/164 countries Overall score: 5.33/10 Indonesia is among the middle scoring countries in the East Asia and Pacific region. Indonesia scores worse in the Basel AML index than neighboring country Singapore, and Australia, but better than neighboring countries Malaysia and the Philippines. **Neighboring countries** • Malaysia: 5.50/10 • Singapore: 4.70/10 • Philippines: 5.84/10	Basel Anti-Money Laundering (AML) Index

Indicator	Description	Sources
	• Australia: 4.04/10 • Papua New Guinea: no data • Timor-Leste: no data World average: 5.31/10 Note: Ranking is out of 164 countries; top possible score is 0 (low risk), lowest score is 10 (high risk).	
	Global Rights Index (2024): Rating: 5 (No guarantee of rights) The ITUC Global Rights Index places Indonesia below the regional average ranking of 4.13 for the Asia-Pacific region, which is rated as the second worst region in the world for workers, behind the Middle East and North Africa. Indonesia performs worse in the GRI than neighboring country Singapore, and Australia, and shares the same rating as Philippines and Malaysia. **Neighboring countries** • Malaysia: 5 • Singapore: 2 • Philippines: 5 • Australia: 3 • Papua New Guinea: no data • Timor-Leste: no data 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". Unions campaigned against the Omnibus Law, which contains provisions that would have removed minimum wage protections for workers. ITUC, 2024	International Trade Union Conference (ITUC) Global Rights Index (GRI) 2024 Reuters, 30 December 2022, "Indonesia issues emergency regulation to replace jobs law" Reuters, 21 March 2023, "Indonesia passes jobs decree into law, easing investment uncertainty" ITUC Asia-Pacific, 5 November 2024, "Indonesian workers celebrate landmark victory as Constitutional Court orders crafting new labour legislation"

Indicator	Description	Sources
	In December 2022, the President signed an emergency regulation replacing the Omnibus Law, which passed into law in March 2023. Reuters, 30 December 2022 , Reuters, 21 March 2023 As a result, Indonesian trade unions filed a judicial review petition that called for amendments to the law. In October 2024, the Indonesian Constitutional Court partially upheld the petition and ruled that the government must develop a new employment law. ITUC Asia-Pacific, 5 November 2024	
Education and general literacy levels in a country	Adult literacy rates, among the population aged 15 years and older (2020): 95.999% Adult female literacy rate (2020): 94.552% Adult male literacy rate (2020): 97.449% Comparison to neighboring countries: • Malaysia (2019): 94.971% • Singapore (2020): 97.585% • Philippines (2019): 96.278% • Australia: no data • Papua New Guinea (2010): 61.6% • Timor-Leste (2020): 69.900%	World Bank Open Data
	Primary school completion rates, total (% of relevant age group) (2022): 103% Primary completion rates, female (% of relevant age group) (2022): 102% Primary completion rates, male (% of relevant age group) (2022): 104% Comparison to neighboring countries: • Malaysia (2022): 95% • Singapore (2021): 101% • Philippines (2022): 88%	World Bank Open Data

Indicator	Description	Sources
	• Australia: no data • Papua New Guinea (2016): 77% • Timor-Leste (2020): 101% 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."	
	Lower secondary education completion rates, total (% of relevant age group) (2022): 102.4% Lower secondary completion rates, female (% of relevant age group) (2022): 101.9% Lower secondary completion rates, male (% of relevant age group) (2022): 102.9% Comparison to neighboring countries: • Malaysia (2022): 83.1% • Singapore (2021): 97.8% • Philippines (2022): 97.9% • Australia: no data • Papua New Guinea (2018): 35.2% • Timor-Leste (2020): 88.9% 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."	World Bank Open Data

Indicator	Description	Sources
	School enrolment, tertiary (2022): 42% gross School enrolment, tertiary, female (2022): 47% gross School enrolment, tertiary, male (2022): 39% gross Comparison to neighboring countries: • Malaysia (2022): 40% • Singapore (2021): 97% • Philippines (2021): 35% • Australia: (2021): 113% • Papua New Guinea (1999): 2% • Timor-Leste (2010): 18% 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."	World Bank Open Data
Attitudes towards migrant workers in a country's population	Migrant Acceptance Index score: 3.93/9 Indonesia's score of 3.93 out of 9 indicates that people in Indonesia are less accepting of migrants than on average for all countries assessed, with a world score of 5.29/9. Indonesia's score is also lower than that of nearby countries and lower than the average score for South-East Asia, which is 4.48/9. Comparison to neighboring countries: • Malaysia: no data • Singapore: 5.21/9 • Philippines: 6.77/9 • Australia: 7.98/9 • Papua New Guinea: no data	Gallup Migrant Acceptance Index

Indicator	Description	Sources
	• Timor-Leste: no data • Southeast Asia average: 4.48/9 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 accessible 2020 data do not include updates to Indonesia's score.	
Legislation and regulation to protect migrant workers	Coverage of legal provisions under the labor laws Indonesia signed the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families in 2004 and ratified it in May 2012. Indonesia has since reported on its efforts to implement the regulations of the convention. The country's next report was initially due in 2022 but is not yet available. UN Human Rights Office of the High Commissioner, 2019 Indonesia's ratification of the Convention appears to have been driven primarily by its intention to enhance protections for Indonesian migrant workers and much of the information provided in Indonesia's initial report to the Committee on the Protection of the Rights of All Migrant Workers and Members of Their Families is focused on work done to support Indonesian migrant workers, with fewer references to efforts to protect foreign migrant workers in Indonesia. Committee on the Protection of the Rights of All Migrant Workers and Members of Their Families, May 2017 This analysis is supported by the Committee's concluding observations, which state "The Committee recognizes that Indonesia, predominantly a country of origin, has made some progress in protecting the rights of its migrant workers abroad, although numerous challenges remain. The	UN Human Rights Office of the High Commissioner, 2019, UN Treaty Body Database Committee on the Protection of the Rights of All Migrant Workers and Members of Their Families, May 2017, 'Consideration of reports submitted by States parties under article 73 of the Convention pursuant to the simplified reporting procedure Initial reports of States parties due in 2013: Indonesia', CMW/C/IDN/1 Committee on the Protection of the Rights of All Migrant Workers

Indicator	Description	Sources
	Committee notes that the State party is increasingly becoming a country of transit and destination and efforts are thus needed to ensure the protection of migrant workers' rights in the State party." (Pg. 1) Committee on the Protection of the Rights of All Migrant Workers and Members of Their Families, October 2017 Indonesia's 1945 Constitution forms the basis for the protection of human rights, on top of which, Law 39 Year 1999 on Human Rights defines "discrimination" and states that "every person has the rights to the protection of human rights and fundamental freedom, without discrimination." Committee on the Protection of the Rights of All Migrant Workers and Members of Their Families, May 2017 Under President Regulation No. 20 of 2018 on the employment of foreign workers, Indonesia only allows foreign workers into the country to perform work that requires skills not available nationally. Other legislation relevant to foreign workers in Indonesia includes: • Law No.21/2007 on the Criminal Act of Trafficking in Persons criminalizes forced labor that covers the elements of trafficking, and its regulatory focus is on migrant workers. Law No. 13 Year 2003 on Manpower which includes the provisions from the foundation, principles and objectives for the development of manpower, including employment of migrant workers. • Minister of Manpower and Transmigration Regulation No. 02/MEN/XII/2004 on Social Security Program for Foreign Workers • Minister of Manpower Regulation No. 10 of 2018 on the Procedure of the Employment of Foreign Workers	and Members of Their Families, October 2017, Concluding observations on the initial report of Indonesia*, CMW/C/IDN/CO/1 ILO, 2023, The alignment of Indonesian laws, policies, and their enforcement with the ILO international labour standards on forced labour : a situation and gap analysis. Presidential Decree no. 20 of 2018 Migration Policy Institute, 2018, 'Indonesia: A Country Grappling with Migrant Protection at Home and Abroad' Overseas Indonesian Students' Association Alliance & BRIN Publishing Iberahim, 2022, Living on the borders: Social

Indicator	Description	Sources
	• Minister of Law and Human Rights Regulation No. 27 Year 2014 on Technical Procedure on the Grant, Extension, Refusal, Cancellation, and the Termination of Visit, Temporary, Permanent, and the Exemption of Residency Permit. • Minister of Law and Human Rights Regulation No. 16 of 2018 on the Procedure of the Grant of Visa and Residency Permit of Foreign Workers ILO, 2023 Foreign workers are not prohibited from forming workers' unions. Committee on the Protection of the Rights of All Migrant Workers and Members of Their Families, May 2017 Employment of foreign workers is only authorized for positions that require qualifications, skills and experience not readily found in Indonesia. Presidential Decree no. 20 of 2018 ; Migration Policy Institute, 2018 Foreign workers, including seasonal workers, are entitled to change their employer or occupation. Committee on the Protection of the Rights of All Migrant Workers and Members of Their Families, May 2017 The Migrant Workers Protection Law, by means of Presidential Instruction No 90/2019, replaces BNP2TKI and establishes the National Board for the Placement and Protection of Indonesian Migrant Workers (Badan Perlindungan Pekerja Migran Indonesia/BP2MI). The adoption of the term 'migrant worker' in its institutional name signifies a deliberate choice to distance itself from the degrading term 'tenaga kerja' that reduces migrant workers to mere	protection for Indonesian migrant workers during COVID-19 pandemic Global Forum on Migration & Development, 2019, Law on Protection of Indonesian Migrant Workers ILO, May 2024, 'New PROTECT project supports women migrant workers and children in Indonesia'

Indicator	Description	Sources
	commodities. Overseas Indonesian Students' Association Alliance & BRIN Publishing Iberahim, 2022 In 2017, Indonesia implemented a new legislation, known as Law No 18/2017, aimed at safeguarding Indonesian migrant workers. This law replaced an older one and emphasizes comprehensive protection for overseas workers throughout the entire recruitment process. The new law encompasses various measures to ensure the well-being of Indonesian migrant workers. First, it provides holistic protection (covering socio-economic and legal aspects) for migrant workers from the pre-recruitment stage until after their return. Third, it implements skill improvement programs for migrant workers. Fourth, it enhances the role of a public agency responsible for the recruitment of migrant workers, which falls under the National Agency for the Protection and Placement of International Migrant Workers. Meanwhile, the involvement of the private sector is limited to placement rather than recruitment. These measures aim to promote ethical recruitment practices. Lastly, it establishes a social security system specifically designed for Indonesian migrant workers. Second it offers integrated services for migrant workers at all levels of governance, ranging from local to central government. Global Forum on Migration & Development, 2019 The European Union (EU), together with the International Labour Organization (ILO) and the United Nations Office on Drugs and Crime (UNODC), is introducing a new initiative named 'PROTECT'. This program is designed to enhance the rights of women	

Indicator	Description	Sources
	migrant workers, children, and vulnerable groups in Indonesia. Over the course of three years, the PROTECT project will aim to promote fair employment practices and reduce the risks faced by vulnerable individuals. It will focus on safeguarding labor rights and taking measures to prevent and address violence against women and children, human trafficking, and the smuggling of migrants. ILO, May 2024	
	Access to social protection, health, and education Foreign workers in Indonesia are required to have insurance coverage with an insurance company operating in Indonesia. Foreign workers that stay in the country for more than six months are required to be enrolled in Indonesia's National Social Security System. The government provides Manpower Social Security Schemes and a National Health Insurance Scheme, that are applicable to foreign migrant workers and members of their families who have worked in Indonesia for at least six months. The children of foreign workers are eligible to attend school in Indonesia after registering with the Ministry of Education and Culture. Initial reports of States parties due in 2013: Indonesia' Social safeguards, which encompass the availability of healthcare services and insurance benefits, can safeguard and enhance the rights of Indonesian female migrant laborers. Nevertheless, a significant proportion of these workers lack sufficient access to social protection. Nonetheless, numerous Indonesian female migrant workers remain without insurance coverage. Various challenges they encounter include	Committee on the Protection of the Rights of All Migrant Workers and Members of Their Families, May 2017, 'Consideration of reports submitted by States parties under article 73 of the Convention pursuant to the simplified reporting procedure Initial reports of States parties due in 2013: Indonesia', CMW/C/IDN/1 ISTIANAH, Istianah; HEKMATYAR, Versanudin. INSURANCE AS A FORM OF SOCIAL PROTECTION FOR WOMEN INDONESIAN

Indicator	Description	Sources
	restricted accessibility, exorbitant fees, insufficient knowledge regarding insurance advantages, and apprehensions about complicated claims processes. Istianah and Hekmatyar, 2023	MIGRANT WORKERS. Indonesian Journal of Social Work, 2023, 6.2.
	Bilateral MOUs or other agreements specifically designed to protect migrant workers Indonesia holds bilateral agreements related to the protection and placement of migrant workers with thirteen countries including Saudi Arabia, Malaysia, and Kuwait. Initial reports of States parties due in 2013: Indonesia' In April 2022, Indonesia signed a memorandum of understanding (MoU) with Malaysia aimed at enhancing the protection of domestic migrant workers. This MoU between the addresses concerns regarding the safety of migrant workers, particularly in light of instances of mistreatment experienced by Indonesian domestic workers in Malaysian households. The primary objective of the MoU is to establish a system that facilitates the matching of Indonesian domestic workers with suitable employers. It is part of a broader initiative that includes the development of applications to strengthen wage protection and complaint mechanisms. Reuters, 2022 Indonesian migrant fishers in Taiwan have organized and sought to collaborate with unions in Indonesia to advocate for a bilateral labor migration agreement between Indonesia and Taiwan. Gearhart and Moynihan, 2025	Committee on the Protection of the Rights of All Migrant Workers and Members of Their Families, May 2017, 'Consideration of reports submitted by States parties under article 73 of the Convention pursuant to the simplified reporting procedure Initial reports of States parties due in 2013: Indonesia', CMW/C/IDN/1 Reuters, 2022, Indonesia, Malaysia sign agreement on protection of migrant workers Gearhart, J, and Moynihan, C., 2025, Upwelling: Fishers Organizing for their Rights and Sustainable Fisheries.

Indicator	Description	Sources
		Accountability Research Center. Accountability Working Paper 19
Ratification of relevant international conventions and domestication of conventions into a national legal framework (Forced labor, human trafficking, and hazardous child labor)	Convention No. 29 – In Force	Forced Labour Convention, 1930 (No. 29)
	Convention No. 105 – In Force	Abolition of Forced Labour Convention, 1957 (No. 105)
	Convention No. 138 – In Force	Minimum Age Convention, 1973 (No. 138)
	Convention No. 182 – In Force	Worst Forms of Child Labour Convention, 1999 (No. 182)
	Protocol 29 – Not Ratified	Protocol of 2014 to the Forced Labour Convention, 1930 (P29)
	Palermo Protocol - Ratified	Protocol to Prevent, Suppress and

Indicator	Description	Sources
		Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime (the 'Palermo Protocol')
	Convention No. 188 – Not Ratified	ILO Convention 188 on Work in Fishing;
	PSMA – Party of the PSMA	The FAO Port State Measures Agreement (PSMA)
	Domestication into national legislation Indonesia's Constitution from 1945 states in Article 27 Paragraph (2) that "every citizen has the right to work and a life worthy of humanity." The 1945 Constitution of the Republic of Indonesia The primary regulatory framework for addressing forced labor and human trafficking in Indonesia are the 2007 Human Trafficking Law and Presidential Regulation No. 22/2021 on the Amendments to Presidential Regulation No. 69/2008 on Task Force for the Prevention and Handling of Human Trafficking Crime. The Human Trafficking law criminalizes all forms of labor trafficking and sex trafficking of adults and prescribes penalties of up to 15 years' imprisonment. Yet forced labor as a specific offence is not officially criminalized unless it is prosecuted as human trafficking. Otherwise, the case	The 1945 Constitution of the Republic of Indonesia ILO, 2023, The Alignment of Indonesian laws, policies, and their enforcement with the ILO international labour standards on forced labour: a Situation and gap analysis, Jakarta: International Labour Office

Indicator	Description	Sources
	is treated as a civil matter. ILO, 2023, US Department of State, 2024 Law No.13/2003 on Manpower covers respect of human rights in the workplace, and includes the foundation, principles and objectives of the development of manpower, including fair opportunities and treatment and worker's protection basic rights, but does not clearly address forced labor. ILO, 2023 The minimum age for work is set at 15 years, as regulated by Article 69 of the Manpower Act and the Law on the Ratification of ILO C. 138. US Department of Labor, 2024 The minimum age for hazardous work, as laid out in Article 74 of the Manpower Act and Article 2 of Ministerial Decree No. 235, is set at 18 years. US Department of Labor, 2024 Children are protected under laws such as Law No. 23/2002 on Child Protection, Law No. 21/2007 on the Eradication of the Criminal Act of Trafficking in Persons, and Law No.13/2003 on Manpower, which prohibits the trafficking and exploitation of children, both economic and sexual. Regardless of the above-mentioned regulatory frameworks, Indonesia national statistics agency estimated 940,000 people aged between 10 - 17 years to be child laborer and gaps remain to adequately protect children from the worst of child labor, including prohibitions against human trafficking of children. In addition, Law No. 21/2007 requires a demonstration of force, fraud, or coercion to constitute a child sex trafficking crime and therefore fails to effectively criminalize all forms of child sex trafficking. ILO, 2023 , US Department of Labor, 2024 , US Department of State, 2024	US Department of State, 2024, 2024 Trafficking in Persons (TIP) Report: Indonesia US Department of Labor, 2024, 2023 Findings on the Worst Forms of Child Labor: Indonesia

Indicator	Description	Sources
	In 2021, Indonesia's president signed Presidential Regulations No.35/2021 on the National Action Plan for Human Rights 2021–2025, which actions are closely aligned with the United Nations' Sustainable Development Goals. However, the lack of enforcement tools makes monitoring compliance difficult. ILO, 2023	
Regulation of recruitment	Country's government-sanctioned oversight mechanisms (regulations, accreditation schemes, inspection, etc.) of recruitment agents Regulations on the provisions of recruitment are covered in Law No.13/2003 on Manpower, Law No. 39/2004 on Placement and Protection of Indonesian Workers Overseas and Law No. 18/2017 on the Protection of Indonesian Migrant Workers. The clarification section of the latter specifically covers protection of Indonesian migrant workers against treatment that violates human rights. ILO, 2023 In addition, placement of Indonesian migrant workers abroad is regulated by the Indonesian Migrant Worker Protection Agency Regulation No. 10 of 2020 concerning Procedures for Placement of Indonesian Migrant Workers, and the Ministry of Manpower Regulation No. 9 of 2019 concerning Procedures for Placement of Indonesian Migrant Workers. IOM, 2023 In relation to government-sanctioned oversight mechanisms (regulations, accreditation schemes, inspection, etc.) of recruitment agents, Indonesia 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	ILO, 2023, The Alignment of Indonesian laws, policies, and their enforcement with the ILO international labour standards on forced labour: a Situation and gap analysis, Jakarta: International Labour Office International Organization for Migration (IOM), 2023. Navigating Indonesian Migrant Fishers: a study on the recruitment and placement process of Indonesian migrant fishers in the Republic of Korea ILO NORMLEX, 'C181 - Private Employment

Indicator	Description	Sources
	categories of workers except seafarers. ILO NORMLEX There are no specific regulations on recruitment in Indonesia's fishing industry. Jones *et al.*, 2019	Agencies Convention, 1997 (No. 181) Jones, K., Visser, D., Humolong Prasetya, J., & Nuriyati, D. (2019). Fish for Export: Working in the wild capture seafood industry in Indonesia. Centre for Trust, Peace and Social Relations, Coventry University
Enforcement of legislation for forced labor, human trafficking, hazardous child labor, migrant worker protections, recruitment and working conditions	TIP Report The US Department of State's 2024 TIP Report assigns Indonesia a Tier 2 TIP Ranking, stating "The Government of Indonesia 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; therefore Indonesia remained on Tier 2." Reliable evidence indicates that Indonesia is making efforts to enforce anti-trafficking, forced labor, and child labor laws but is not always effective in doing so. Concerns continue to be highlighted by observers about a lack of capacity for and awareness by authorities to implement and enforce laws, including ineffective coordination, identification and reporting, lack of staffing, and official complicity. Efforts reported include increased investigations, prosecutions, and convictions for suspected trafficking crimes, as well as investigation into labor	US Department of State, 2024, 2024 Trafficking in Persons (TIP) Report

Indicator	Description	Sources
	trafficking cases in the fishery sector and support for the increased number trafficking victims including those exploited in online scam operations. There has been cooperation with foreign government to address one scam operation based in Indonesia. Nevertheless, while the government reported investigations in labor trafficking cases in fisheries, only two labor trafficking victims were identified and there continued to be a lack of prioritization of staffing and funding for effective oversight on the fishing industry. There were also limited efforts made to investigate alleged exploitation in People's Republic of China affiliated industrial parks. Corruption and official complicity in trafficking continued to impede anti-trafficking efforts and the lack of national Standard Operating Procedures to identify trafficking victims in all sectors continued to limit proactive victim identification, especially for men and boys. Most potential trafficking cases involving Indonesian migrant workers were continued to be administratively mediated, which did not provide for criminal liability or act as an adequate deterrent for traffickers. The 2007 anti-trafficking law did not prohibit all forms of trafficking, as it required a demonstration of force, fraud, or coercion to constitute a child sex trafficking crime. The Indonesian National Police's Criminal Investigative Division was the lead agency for investigating trafficking crimes involving multiple jurisdictions; provincial and district-level police investigated all other trafficking cases. However, ineffective coordination among agencies and a lack of a centralized database hampers law enforcement anti-trafficking efforts as well as comprehensive data collection. In addition, concerns remain on endemic corruption and official complicity in trafficking crime	

Indicator	Description	Sources
	particularly in the palm oil, fishing, and extractive industries.	
	Child labor laws Evidence of enforcement of child labor laws from US Department of Labor There are gaps in Indonesia's legal framework for child labor and, overall, enforcement is not effective. Enforcement of child labor laws is hindered by a lack of capacity within the relevant authorities and a lack of comprehensive and reliable enforcement data. Agencies that are responsible for enforcement are the Ministry of Manpower (MOM) and the Indonesian National Police. Whilst the MOM increased the budget for the labor inspectorate from US$15.1 million in 2022 to US$22.7 million in 2023 to conduct inspections and investigation as well as building labor inspector capacity, there continued to be lack of resources and personnel needed to effectively enforce child labor laws. The US Department of Labor states that the number of Indonesia's labor inspectors increased to a total of 1,467 against their recommended 9,047 to be able to cover the full work force. Between January 2023 and September 2023 these labor inspectors conducted 14,458 worksite inspections, but the number of child labor violations found remains unknown. It is also not clear whether investigations into suspected cases of the worst forms of child labor had been conducted, if prosecutions were initiated, and if perpetrators got convicted. A lack of sufficient funds means that anti-trafficking task forces at the national, provincial, and local levels were unable to carry out investigations and their	US Department of Labor, 2024, 2023 Findings on the Worst Forms of Child Labor: Indonesia

Indicator	Description	Sources
	mandate according to the government's anti-trafficking in persons policies and regulations. The government lacks a centralized system for collecting and consolidating information on criminal law enforcement related to child labor and its worst forms, and it does not have the necessary resources to compile this data into a central database. The decentralized structure of criminal law enforcement data and the voluntary nature of reporting by precincts may have led to the underreporting of information related to the worst forms of child labor. US Department of Labor, 2024	
	Global Slavery Index (2023): The 2023 GSI methodology states the Government Response Rating is "based on data collected on 141 indicators that are relevant to understanding how each government is tracking towards achieving 42 activities organized into five milestones. Each milestone represents an aspect of a strong government response to modern slavery; for example, supporting survivors to exit and remain out of modern slavery". Est. no. of people living in modern slavery: 1,800,000 Prevalence Index Rank: 6.7 per 1,000 people Vulnerability to Modern Slavery: 49/100 Government Response Rating: 50/100 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	Global Slavery Index's overall ratings

Indicator	Description	Sources
	government response to modern slavery; for example, supporting survivors to exit and remain out of modern slavery". 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.	
	Documentation from national labor inspection and other law enforcement agencies There is some information available regarding the number of worksite inspections and trafficking related investigations. Between January 2023 and September 2023, over 14,400 worksite inspections were conducted. US Department of Labor, 2024 The government reported investigating 1,061 trafficking cases in 2023, including 370 for sex trafficking, 603 for labor trafficking, and 88 for unspecified forms of trafficking. US Department of State, 2024 However, there is a lack of reliable and comprehensive data on labor law enforcement. Poor coordination between agencies and the lack of a centralized database hindered data collection, therefore reported data were incomplete and likely duplicative. US Department of Labor, 2024 , US Department of State, 2024	US Department of Labor, 2024, 2023 Findings on the Worst Forms of Child Labor: Indonesia US Department of State, 2024, 2024 Trafficking in Persons (TIP) Report
	ILO Between 2022 and 2024, 15 Observations and Direct requests were adopted by the ILO's Committee of Experts on the Application of Conventions and	NORMLEX, Information System on International Labour Standards -

Indicator	Description	Sources
	Recommendations (CEACR) on numerous relevant conventions in relation to forced labor, the worst forms of child labor, and human trafficking, indicating areas where the supervisory bodies have asked for more action or information on the implementation of obligations set out by the conventions. An overview of the most recent Observations and Direct Requests are provided below: The most recent direct requests to the Indonesian government in relation to forced labor and child labor revolved around providing details on i) the practical application of certain sections of Law No. 9 of 1998 related to freedom of expression in public and penalties (including compulsory labor) applied for expressing views opposed to the political, social or economic system, ii) enforcement measures and detected violations related to the regulation of light work for children aged 13 and 14 years under section 69(2) of the Manpower Act, iii) updates and detailed information on the measures taken to address the worst forms of child labor, including progress in education access, trafficking prevention, hazardous work in fisheries, and protections for migrant children. 2024 • Observation on Convention no. 87: Freedom of Association and Protection of the Right to Organise Convention • Observation on Convention no. 98: Right to Organise and Collective Bargaining Convention 2023 • Observation on Convention no. 105: Abolition of Forced Labour Convention.	Search comments by the supervisory bodies ILO, 2013, Eliminating Child Labour in Indonesia: 20 Years of Support ILO, 2021, Indonesia is committed to eliminate child labour in the country

Indicator	Description	Sources
	• Observation on Convention no. 98: Right to Organise and Collective Bargaining Convention • Direct Request in relation to the Maritime Labour Convention • Observation on Convention no. 29: Forced Labour Convention • Direct Request in relation to Convention no. 105: Abolition of Forced Labour Convention 2022 • Direct Request in relation to Convention no. 81: Labour Inspection Convention • Observation on Convention no. 81: Labour Inspection Convention • Observation on Convention no. 98: Right to Organise and Collective Bargaining Convention • Observation on Convention no. 87: Freedom of Association and Protection of the Right to Organise Convention • Observation on Convention no. 138: Minimum Age Convention • Direct Request in relation to Convention no. 138: Minimum Age Convention • Observation on Convention no. 182: Worst Forms of Child Labour Convention • Direct Request in relation to Convention no. 182: Worst Forms of Child Labour Convention The Indonesian government has been working together with the ILO for several decades to eliminate child labor and has made significant progress in policy development, stakeholder engagement, education access, and targeted interventions. The country set out as its goal to eradicate the Worst Forms of Child Labor by 2022. ILO, 2013 Indonesia was the first country in Asia to ratify the ILO's core Conventions, including the child labor	

Indicator	Description	Sources
	Conventions No. 138 The Minimum Age Convention and No. 182 The Elimination of the Worst Forms of Child Labour. However, the country still faces challenges to eliminate child labor such as fragmented child labor data and updates, the dissolution of the National Committee on the Elimination of the Worst Forms of Child Labor in 2014, and lack of policies prioritizing child labor eradication at provincial and local levels. The COVID-19 pandemic also worsened conditions. ILO, 2021	
Evidence of forced labor, human trafficking, and hazardous child labor in the country	General evidence from other sectors According to the US Department of State's 2024 Trafficking in Persons report, each of Indonesia's 38 provinces is a source and destination for trafficked persons. Men, women, and children are exploited abroad through forced or debt-based coercion in domestic work, factories, construction, and manufacturing; on Malaysian oil palm plantations; and on fishing vessels. Women and girls are exploited by sex traffickers across Indonesia. Within Indonesia, traffickers exploit men, women and children in fishing, fish processing, construction, mining, manufacturing, and on palm oil and other plantations. The US Department of Labor's 2024 List of Goods or Inputs Produced by Child Labor or Forced Labor explicitly identifies fish, sandals, gold, oleochemicals, palm oil and fruit products, rubber, oleochemicals, nickel, tin, and tobacco as goods produced by child labor and / or forced labor. US Department of Labor, 2024 Categorical Worst Forms of Child labor include commercial sexual exploitation, forced domestic work, fishing and mining, and engagement in illicit	US Department of State, 2024, 2024 Trafficking in Persons (TIP) Report US Department of Labor, September 2024, 2024 List of Goods Produced by Child Labor or Forced Labor US Department of Labor, 2024, 2023, Findings on the Worst Forms of Child Labor - Indonesia ILO, 2023, The Alignment of Indonesian laws, policies, and their enforcement with the ILO international labour standards on forced

Indicator	Description	Sources
	activities such as sale, production, and trafficking of drugs. US Department of Labor, 2024 According to a 2023 report by the ILO, the Indonesian Migrant Worker Protection Agency (BP2MI) recorded 1,853 violations of worker rights in 2022 including unpaid wages, illegal recruitment and the withholding of documents, which are indicators of forced labor. Out of these 1,853 complaints, 54 were classified as human trafficking cases. BP2MI also logged complaints of forced labor, including 101 unpaid wage cases, 108 illegal recruitment cases and 47 cases of document withholding. ILO, 2023	labour: a Situation and gap analysis, Jakarta: International Labour Office

Table 1: Indonesia - Country-level indicators

Indonesia: Seafood industry-level indicators

Indicator	Description	Sources
Direct evidence of forced labor, human trafficking, and hazardous child labor	Indonesia's seafood industry has been linked to human trafficking, forced labor, and hazardous child labor. The US Department of State's 2024 Trafficking in Persons (TIP) report states "Within Indonesia, traffickers exploit men, women and children in fishing, fish processing, construction, mining, and manufacturing, and on palm oil and other plantations." US Department of State, 2024 Additionally, fish from Indonesia is listed in the US Department of Labor's 2023 List of Goods Produced by Child Labor and Forced Labor as produced by child labor and forced labor. US Department of Labor, September 2024 The US Department of Labor's 2023 Findings on the Worst Forms of Child Labor identifies hazardous child labor in seafood production, including work on fishing vessels and offshore platforms, and in processing facilities. Evidence sources cited include reporting by the US Embassy in Jakarta, the 2022 Trafficking in Persons Report, an ILO CEACR Observation concerning the Worst Forms of Child Labour Convention 1999 (No. 182), and a March 2021 news report by The Straits Times on the impact of the Covid-19 pandemic on child labor in Indonesia. Public information from those other sources is limited. Most notably, the US Embassy information is unpublished. US Department of Labor, 2024 , The Straits Times, 9 March 2021 <u>Aquaculture</u> Evidence relating to aquaculture is negligible.	US Department of State, 2024, Trafficking in Person Report 2024 US Department of Labor, September 2024, 2024 List of Goods Produced by Child Labor or Forced Labor US Department of Labor, 2024, 2023 Findings on the Worst Forms of Child Labor The Straits Times, 9 March 2021, 'Covid-19 pandemic pushes more into child labour in Indonesia' BPS-Statistics Indonesia and ILO, 2009, Working Children in Indonesia 2009 ILO and National Research and Innovation Agency of Indonesia (BRIN), 2025, Understanding working conditions

Indicator	Description	Sources
	According to a 2009 report on child labor in Indonesia, 57% of children aged between 5-17 years were involved in Agriculture, Forestry, Hunting and Fishery industry. BPS-Statistics Indonesia and ILO, 2009 However, it is unclear how many children were active specifically in fishing or aquaculture and whether these figures are still representative given the age of the report. Fishing There are numerous reports documenting the abuse of Indonesian migrant workers recruited into work on foreign fishing vessels operating overseas as well as foreign and Indonesian fishers working on board foreign fishing vessels operating in Indonesian waters. Given the extensiveness of information, only evidence from 2020 onwards is presented here. For additional information, please see the SSRT tropical tuna profile. Evidence from the 2024 Survey on Decent Work in Marine Fishing among both national and migrant workers on national or foreign flag vessels fishing in Indonesia's Exclusive Economic Zone (EEZ), high seas (international waters) or within the EEZ of another country and docking in Indonesia indicates the presence of forced labor, human trafficking, and child labor. Forced labor was found among workers representing 1.5% of fisher employees in the 18 ports surveyed. Fishing employees reported instances of withholding identity documents, consequences for voicing complaints, including job loss, wage deductions, or physical violence. Respondents indicated to be trapped by debts to vessel owners, captains, or agents and lacked freedom to terminate	of fishers in Indonesia: Evidence from the 2024 Survey on Decent Work in Marine Fishing, Geneva: International Labour Office Greenpeace Southeast Asia, 2024, NETTING PROFITS, RISKING LIVES: The Unresolved Human and Environmental Exploitation at Sea Monga Bay, 20 May 2020, 'Indonesia may bar citizens from working on foreign fishing boats after spate of deaths' BBC News, 11 June 2020, 'The Indonesian fishermen whose bodies were thrown overboard' US Department of State, 2020, Trafficking in Person Report 2020

Indicator	Description	Sources
	work contracts. There were reports of abusive working and living conditions, such unsafe conditions making them fear for their safety and health as well as inadequate food and water provisions. Particularly on large vessels, workers faced deceptive recruitment, unaware they would be working on fishing vessels. Bonded labor affected 0.7% of all fishers (1.1% on large vessels), involving coercion through debt, often under unfair terms and 1.2% of fishers were trafficked for forced labor. Although the survey may not have been fully equipped to capture child labor, 636 children (0.7%) were found working in marine fishing. The survey reported separately on other indicators of forced labor and issues such excessive working hours, hazardous working conditions, withholding payments, lack of written contracts and payment of recruitment fees. ILO and BRIN, 2025 *Indonesian fishers working on foreign vessels overseas* Greenpeace has issued several reports covering labor abuse of Indonesian migrant workers onboard foreign vessels. Their most recent 2024 report created in collaboration with the Indonesian Migrant Workers Union analyzed complaints from Indonesian migrant fishers and follow-up interviews were conducted. It found that all workers interviewed experienced several labor abuse incidents that include menace of penalty and involuntariness and therefore may amount to forced labor. The four most common indicators found were i) deception, including financial deception by recruitment agencies, forging of documents and changing terms of employment, among others ii) retention of identity documents by recruitment agencies or vessel captains iii) abuse of	

Indicator	Description	Sources
	vulnerability as workers were given limited time to go over the contract, and iv) debt bondage through having to pay recruitment fees and other costs, such as applications fees for passports and visas, transportation, medical check-ups, safety training and other "administration costs" charged by recruitment agencies. The recruitment agencies lent this money upfront and withheld a portion of workers' wages during the first three to fourteen months. Six out of the twelve Taiwanese-flagged fishing vessels investigated were associated with activities that are considered indicative of IUU fishing Greenpeace Southeast Asia, 2024 The 2024 TIP report states that Indonesian fishers working on board Chinese, Korean, Vanuatuan, Thai, Malaysian, Italian, UK and Philippines flagged or owned fishing vessels operating in Indonesian, Thai, Sri Lankan, Mauritian, and Indian waters are subject to forced labor. Most Indonesian fishermen are employed on vessels in Taiwan and Korea's secluded distant water fleets. Fishers are recruited by agencies in Myanmar, Indonesia, and Thailand with false promises and then experience little or no payment, document retention, poor living and working conditions, restriction of movement and other abuses including physical and sexual abuse. US Department of State, 2024 After video evidence of the deaths of Indonesian fishers on board Chinese-owned fishing vessels emerged in 2020, media reports in May of the same year stated the Indonesian Government is considering placing a temporary moratorium on Indonesian fishers working on foreign fishing vessels, while they work to improve protections and better coordinate	

Indicator	Description	Sources
	recruitment processes for migrant fishers. MongaBay, 20 May 2020 , BBC News, 11 June 2020 *Foreign and Indonesian fishers working on board foreign fishing vessels operating in Indonesian waters* Migrant fishers from other parts of Asia are also subjected to forced labor on fishing vessels operating in Indonesian waters. According to a study on human trafficking, Indonesia is the main destination of almost half of the migrant fishers trafficked from Thailand, Cambodia, and Vietnam. US Department of State, 2020 For more information on foreign and Indonesian fishers working on board foreign fishing vessels operating in Indonesian waters, please see the SSRT tropical tuna profile.	
ILO indicators of forced labor and ILO R190 definition of hazardous child labor	Aquaculture Evidence of indicators of forced labor and hazardous child labor has been found for the shrimp aquaculture sector, which is covered in the Aquaculture and Processing indicator tables. Work on board Indonesian flagged vessels A 2019 study by Coventry University explored working conditions among fishers and seafood processing workers in Indonesia, focusing on the Indonesian flagged fleet fishing in Indonesian waters primarily. The study found no direct evidence of widespread use of forced labor, human trafficking, or hazardous child labor. But the report documented high levels of informality, widespread use of (informal) labor brokers, the existence of recruitment fees, cases of withholding of ID documents, and generally low levels of organization and awareness of	Jones, K., Visser, D., Humolong Prasetya , J., & Nuriyati, D.,2019, Fish for Export: Working in the wild capture seafood industry in Indonesia. Centre for Trust, Peace and Social Relations, Coventry University Research paper: Study of the impact of intermediaries on environmental and social outcomes and worker vulnerability in small-scale fishing and

Indicator	Description	Sources
	rights among seafood workers (both fishers and factory workers). The report noted that deductions are frequently made from fishers' wages that can leave fishers in a cycle of debt when catches are not good, forcing them to return to the fishing vessel, indicating forced labor. It also found, through interviews with canning factory workers working primarily involved in processing tuna, company representatives, union and NGO staff, and government officials, that some tuna processing workers were falsely employed under the promise that they would be hired on permanent contracts after completing a fixed short-term contract but were then denied this shift to a more secure contract. The research also found evidence of long working hours for piece-rate laborers and denial of leave by some employers. Jones *et al.*, 2019 A 2020 ILO and MBA report studying the effects of intermediaries in fisheries and aquaculture supply chains found that for small scale fishermen there is a higher risk for debt-bondage, suggesting that this is due to them being poor and highly vulnerable in combination with a lack of social safety nets, access to transparent financing, and regulatory oversight on these intermediaries providing finance. ILO and Monterey Bay Aquarium, 2020 There were 338 complaints received of forced labor and human trafficking involving migrant fishers from Indonesia in the period of 2014 to 2020. The complaints involved practices of wage withholding (87% of the complaints), abusive working and living conditions (82% of the complaints), deception (80% of the complaints), and abuse of vulnerability (67% of the complaints). Another 11 complaints concerned cases of Indonesian fishers dying at work due to physical assault and a lack of medical care	aquaculture in Indonesia and Viet Nam, 2020, ILO and Monterey Bay Aquarium Greenpeace and SBMI, 2021, "Forced Labour at Sea: The Case of Indonesian Migrant Fisher SBMI and Greenpeace, 2020, "Data Kasus Pengaduan ABK Meninggal Kepada Serikat Buruh Migran Indonesia (SBMI) Sepanjang 2015-2020" as referenced in ILO, 2023, The Alignment of Indonesian laws, policies, and their enforcement with the ILO international labour standards on forced labour: a Situation and gap analysis, Jakarta: International Labour Office

Indicator	Description	Sources
	Greenpeace and SBMI, 2021; SBMI and Greenpeace, 2020 as referenced in ILO, 2023	
Fishing, aquaculture and processing regulations and policies	Labor-related fishing and aquaculture legislation Aquaculture Regarding aquaculture legislation, there are 28 legal instruments, including laws, government and ministerial regulations, that directly relate to fish farming, although there is no dedicated policy for shrimp farming. INFID, 2022 Shrimp aquaculture workers are typically classified either as agriculture workers or industry workers. Their rights and protections fall under regular labor laws that apply to these categories. Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024 The only legal reference for the social protection of aquaculture workers is the general Labor Law No. 13/2003. No specific laws or more technical ministerial regulations that address the protection of workers in the aquaculture sector exist. Human Rights Law No. 39/1999 and more specifically Law No. 7/2016 focuses on the protection and empowerment of aquaculture farmers, among others. The latter sets out government protection mechanisms, which help to provide certainty of business for shrimp farmers or producers, through empowerment programs, insurance, and others. However, the law has not yet been effectively implemented. INFID, 2022 Fishing The main fisheries authority in Indonesia is the Ministry of Marine Affairs and Fisheries, but the	International NGO Forum on Indonesian Development (INFID), 2022, FINAL REPORT BUSINESS AND HUMAN RIGHTS IN THE FISHERIES SECTOR: The Role and Support of Stakeholders in Shrimp Aquaculture Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024, Net profits, human costs: How supermarkets shape exploitation in shrimp aquaculture ILO NATLEX Database - Fishers ILO and National Research and Innovation Agency of Indonesia (BRIN), 2025, Understanding working conditions of fishers in

Indicator	Description	Sources
	Ministry of Manpower and the Ministry of Transport also hold related responsibilities for labor conditions on fishing vessels. The ILO NATLEX database lists four laws relating specifically to fishers and six regulations. ILO NATLEX Database - Fishers A 2025 report by the ILO and National Research and Innovation Agency of Indonesia (BRIN) identifies five key legislative elements governing decent work in the fishing sector in Indonesia: • Law No. 13/2003 on Manpower which covers general labor regulations applicable to sectors, including fishing. • Law No. 17/2008 on Shipping which applies to all vessels, including fishing vessels and covers basic conditions of employment like salary, working hours and rest periods, accommodation and provisions, health care, and accident insurance. • Law No. 7/2016 on Protection and Empowerment of fishers, fish farms and salt farmers. This law prohibits vessel owners from employing any fishers without a work agreement. • Regulation 3/2019 of the Ministry of Marine Affairs and Fisheries gives detailed guidelines for implementation or specific rules that are covered within the framework of Law No. 7/2016. • Ministerial Regulation of the Minister of Marine Affairs and Fisheries No. 33/2021 on Monitoring, Control and Surveillance (MCS) and Manning of fishing vessels. This regulation provides the basic conditions of employment on board fishing vessels, including the	Indonesia: Evidence from the 2024 Survey on Decent Work in Marine Fishing, Geneva: International Labour Office ILO, 2023, The Alignment of Indonesian laws, policies, and their enforcement with the ILO international labour standards on forced labour: a Situation and gap analysis, Jakarta: International Labour Office Ecolex, Regulation of the Minister of Marine Affairs and Fisheries of the Republic of Indonesia No. 2/PERMEN-KP/2017 concerning Requirement and Mechanism of Human Rights Certification for Fisheries. Foundation for International

Indicator	Description	Sources
	minimum age (18 years old), certification of skills, medical certificate, work agreement, working hours, rest period, remuneration system, leave, occupational safety and health risks, and repatriation. It also legislates that work agreements must be approved by harbormasters. ILO and BRIN, 2025 A 2023 ILO report mentions some additional laws and regulations to the above that provide the legislative basis for catch fisheries' employment standards. These include: • Law No. 31/2004 as amended by Law No. 45/2009 on Fisheries • Presidential Regulation No.18/2019 on the Ratification of Standards of Training, Certification and Watchkeeping for Fishing Vessel Personnel (STCW-F), 1995 • Marine Affairs and Fisheries Ministerial Regulation No.35/2015 on Systems and Certification of Human Rights in Fisheries Businesses • Marine Affairs and Fisheries Ministerial Regulation No.10/2021 on Standards for Business Activities and Products in the Implementation of Licensing Risk-Based Business in the Marine and Fisheries Sector • Government Regulation No.7/2000 on Marine Affairs • Government Regulation No.27/2021 on the Administration of the Marine and Fisheries Sectors • Marine Affairs and Fisheries Ministerial Regulation No.33/2021 on Fishing Logbooks, Monitoring	Human Rights Reporting Standards (FIHRRST), January 2017, 'Indonesia takes action to protect the rights of fishermen' Jones, K., Visser, D., Humolong Prasetya, J., & Nuriyati, D., 2019, Fish for Export: Working in the wild capture seafood industry in Indonesia. Centre for Trust, Peace and Social Relations, Coventry University ILO, 2019a, Indonesia's fisheries human rights certification system: assessment, commentary, and recommendations - Working Paper ILO SEA Fisheries, No date, National Policy and Regulations International Organization for Migration (IOM),

Indicator	Description	Sources
	• Transportation Ministerial Regulation No.59/2021 on Provision of Services Related to Sea Transportation The employment norms for fisheries industry workers tend to be regulated under the Manpower Law, supplemented by a series of specific regulations issued by the Ministry for Marine Affairs and Fisheries for the fishing industry. The Ministry of Manpower heavily depends on the Manpower Law to carry out its tasks and functions, but provisions in the Manpower Law on labor conditions get overridden by more specific regulations for the fishing industry. Most of the provisions that detail protection and employment standards for fishers are incorporated within Marine Affairs and Fisheries ministerial regulations, given that their function is to develop and empower human resources in the marine and fishery sector. The Indonesian Commercial Code, specifically Book 2 Chapter 4 of the Commercial Code on sea-based employment contracts, is used as legal basis for sea-based contracts. As a result, management of Indonesian fishers thus falls under the authority of the Marine Affairs and Fisheries Ministry and not the Manpower Ministry. Nevertheless, the Ministry of Manpower remains the authority to regulate industrial relations in the sector and to assist in the settlement of labor contract disputes for fisheries industry workers. Regulations to protect victims of forced labor in relation to human trafficking primarily focus on migrant workers. For example, Marine Affairs and Fisheries Ministerial Regulation No.33/2021 does not provide for sanctions for violations of sea-based employment agreements. In contrast, Government Regulation No.22/2022 on Placement and Protection of Migrant Seafarers and Migrant Fisher stipulates	2023, Navigating Indonesian Migrant Fishers: a study on the recruitment and placement process of Indonesian migrant fishers in the Republic of Korea Freedom Fund, 2023, Indonesia Hotspot Report ILO, 2019b, Indonesia and the Work in Fishing Convention, 2007 (No. 188): a comparative analysis – Working Paper Ecolex, Law of the R.I. No. 7/2016 on the Protection and Empowerment of Fishermen, Fish Raisers and Salt Farmers ILO, 2020, Study on the recruitment and placement of migrant fishers from Indonesia Database Peraturan,

Indicator	Description	Sources
	sanctions for violations during the recruitment and contracting phase of the migration process for migrant fishers. Stronger regulatory protections are needed for fishers working in Indonesian waters and on vessels flagged to Indonesia. ILO, 2023 In relation to the earlier referenced Regulation of the Minister of Marine Affairs and Fisheries of the Republic of Indonesia No. 35/ PERMEN-KP/ 2015 on Human Rights Systems and Certification in Fisheries Businesses, and Regulation of the Minister of Marine Affairs and Fisheries of the Republic of Indonesia No. 2/PERMEN-KP/2017 concerning Requirement and Mechanism of Human Rights Certification for Fisheries. Ecolex • These regulations establish a certification mechanism for human rights on fishing boats above 30 GT. Requirements include: a human rights policy, a due diligence and remediation system, and a human rights audit. Provisions for monitoring compliance include annual surveillance audits and crew list checks. Under the regulation, companies that do not obtain human rights certification are not allowed to operate in Indonesian waters. FIHRRST, January 2017 • The certification is intended to cover the protections for fishers established in the ILO Work in Fishing Convention (C188). Jones *et al.*, 2019 • Failure to be certified can result in the suspension or cancellation of fishing permits issued by the MMAF. ILO, 2019a Other related laws, regulations and policies include: • BNP2TKI Regulation 3/2013 on Technical Guidance on Placement and Recruitment of	Keputusan Presiden (KEPPRES) No. 59 Tahun 2002

Indicator	Description	Sources
	Fishers on Foreign-flagged Fishing Vessels. ILO SEA Fisheries, no date • Ministry of Manpower, Regulation 9/2019 on Procedures on the Placement of Indonesian Migrant Workers. IOM, 2023 In June 2022, the Indonesia government approved a regulation bolstering protections for migrant fishers, Regulation No. 22/2022 on the Placement and Protection of Migrant Shipping Vessels Crew and Fishing Vessels Crew. The regulation introduced important changes like harmonization of the issuing of permits to private recruitment agencies under the Ministry of Manpower and thus replacing overlapping authorities that existed previously. Another change is better alignment between Indonesia's placement scheme and standards set by ILO Convention 188 on Work in Fishing. Freedom Fund, 2023 Indonesia has yet to ratify ILO Convention No.188 on Work in Fishing. An analysis published by the ILO in 2019 had shown that the country does not yet have sufficient legislation to comply with the requirements of the convention. It stated that Indonesia does not have legislation in place to enable it to carry out inspections of living and working conditions on board foreign flagged fishing vessels in its ports. ILO, 2019b Law of the Protection and Empowerment of Fishermen, Fish Raisers and Salt Farmers (No. 7/2016) Ecolex • Fishers protections not covered by other laws are provided in Law 7 (2016) Protection and Fisherman Empowerment. • Article 28 requires fishing vessel owners to provide workers with a written work agreement.	

Indicator	Description	Sources
	• Other issues covered include the safety of fishers, and access to insurance for occupational accidents and loss of lives. Regulation of Minister of Marine Affairs and Fisheries Number 42 of 2016 on Sea Working Agreement for Fishing Crew • The regulation aims to standardize work contracts for Indonesian fishers. It provides for a standard sea working agreement (PKL) which should set out employment conditions including working hours, wages, and health and life insurance. Jones *et al.*, 2019 Law 18/2017 on Protection of Indonesian Migrant Workers extends protections for migrant workers to fishers and seafarers. ILO, 2019b Regulations in relation to child labor and the seafood industry, there is the Presidential Decree on the National Action Plan for the Elimination of the Worst Forms of Child Labour (No. 59/2002), which identifies 13 kinds of the worst forms of child labor with specifically in relation to seafood: • The employment of children as pearl divers • The employment of children to work at offshore fishing platforms. Database Peraturan, Keputusan Presiden (KEPPRES) No. 59 Tahun 2002 For more fishery related laws, regulations and policies, please see also the SSRT tropical tuna profile.	
Enforcement and implementation	While there is a legal framework in place to protect seafood workers, including fishers and processing	Perkumpulan Migunani lan Mberkahi, AKATIGA

Indicator	Description	Sources
of industry-specific regulations and policies	workers, its implementation and enforcement is poor and does not apply to shrimp farm workers. In relation to aquaculture, government officials at national level and provincial levels indicated confusion during interviews about the responsible agencies for protection of workers in shrimp sectors. Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024 Law No. 7/2016 that covers, among others, the protection and empowerment of aquaculture farmers, has reportedly not yet been effectively implemented. INFID, 2022 Regarding fishing, the US Department of State's 2024 Trafficking in Persons (TIP) report describes that Regulation No. 22 of 2022, as required by the 2017 migrant worker law, prescribes the provision of pre-departure orientation to Indonesian migrant workers in fishing, including information on labor rights and safety at sea. However, this does not apply to domestic fishermen, nor provide post-return training on fishermen's rights or clarity on whether this should be funded and provided by the employer or government. In addition, there continued to be a lack of mechanisms to monitor recruitment agencies registered before 2022 and there was a lack of agreement between the Ministry of Manpower and Ministry of Transport on a clear inspection and enforcement mandate. An NGO reported that labor inspectors failed to interview or screen fishermen for indicators of abuse or trafficking and that due to overlapping government mandates, fishermen were not aware how to report labor abuses. There was also no effective implementation of labor regulations by the government for the fishing sector. An NGO reported indications of debt-based coercion,	and ELSAM, 2024, Net profits, human costs: How supermarkets shape exploitation in shrimp aquaculture. International NGO Forum on Indonesian Development (INFID), 2022, FINAL REPORT BUSINESS AND HUMAN RIGHTS IN THE FISHERIES SECTOR: The Role and Support of Stakeholders in Shrimp Aquaculture US Department of State, 2024, 2024 Trafficking in Person Report ILO, 2023, The Alignment of Indonesian laws, policies, and their enforcement with the ILO international labour standards on forced labour: a Situation and gap analysis, Jakarta:

Indicator	Description	Sources
	deception, intimidation, threats, document retention, withholding of wages, and physical abuse among fishers across numerous recruitment agencies in both the international and domestic fishing sectors. NGOs noted that many Indonesian and migrant fishermen were unaware of their rights. US Department of State, 2024 In catch fisheries, the legal minimum wage is not applied as income of most fishers is calculated through the Profit-Sharing System, where income is determined each month based on the value of the catch. As a result, the work of fishers does not meet the legal definition of employment as it is defined in Law No.13/2003 on Manpower and denies them access to employment and social protections. ILO, 2023 The implementation of labor rights-related regulations in fishing is hindered by a lack of clarity about institutional responsibility. The Ministry of Manpower is technically responsible for all workers, including fishers, but does not take responsibility for fishers due to the informal nature of fishing work in the country. Responsibility for on board audits under the human rights certification mechanism is assigned to the Ministry of Marine Affairs and Fisheries but the certification has not been implemented widely in Indonesia and there is a general lack of knowledge about the regulation for human rights certification among companies, fishing vessel captains, and harbormasters. The Ministry of Transportation and harbor masters also have labor-related responsibilities. Jones *et al.*, 2019 A similar sentiment is portrayed by a 2025 ILO report which indicates that the overlapping jurisdictions among different legislative tools and authorities	International Labour Office Jones, K., Visser, D., Humolong Prasetya, J., & Nuriyati, D., 2019, Fish for Export: Working in the wild capture seafood industry in Indonesia. Centre for Trust, Peace and Social Relations, Coventry University ILO and National Research and Innovation Agency of Indonesia (BRIN), 2025, Understanding working conditions of fishers in Indonesia: Evidence from the 2024 Survey on Decent Work in Marine Fishing, Geneva: International Labour Office ILO, 2020, Study on the recruitment and placement of migrant fishers from Indonesia – Working Paper

Indicator	Description	Sources
	remain a significant challenge as it lacks a coherent and comprehensive legal framework given that protection of worker rights are regulated under labor laws, shipping laws, or fisheries laws. In addition, implementation and enforcement of laws and regulations remains difficult, particularly for small-scale fishing vessels that operate largely informally, and for the distant water fishing fleet. ILO and BRIN, 2025 Nevertheless, improvements have also been reported in tackling the issue of institutional responsibility for fishing vessel inspections. The Ministry of Marine Affairs and Fisheries and the Ministry of Manpower signed a memorandum of understanding in September 2022, which includes scope for promotion of joint inspection. The ministries are working to create stronger inspection protocols for fishing vessels with the support of ILO Indonesia. However, the ILO concludes that a reluctance by government to inspect working conditions on fishing vessels and the lack of a formal mechanism to record cases of forced labor in the fishing industry increased the vulnerability of fishers to forced labor. ILO, 2023 A 2020 ILO report on recruitment and placement of fishers from Indonesia found that there were gaps in the implementation of recruitment regulations and that fishers are recruited by informal/illegal recruitment agents. ILO 2020 The ILO reported in 2019 that although a Human Rights Team (HRT) was established in 2017 with the purpose of appointing an accredited assessment agency and training institute for the certification mechanism, the HRT had yet to meet, thus delaying the accreditation of these organizations. Meanwhile, there is little incentive for industry to comply with the	ILO, 2019, Indonesia's fisheries human rights certification system: assessment, commentary, and recommendations – Working Paper

Indicator	Description	Sources
	human rights certification regulations as it is yet to be widely recognized and does not afford an economic advantage. The threat of revoking fishing permits is also insufficient as it only applies to vessels that are licensed by the MMAF. These comprise vessels over thirty gross tonnes, which account for an estimated 1% of the Indonesian fishing fleet only. Enforcement actions against smaller vessels are limited. ILO, 2019 Requirements about crew documentation and safety training on board fishing vessels seem not to be systematically implemented and outsourcing and temporary contracts are used in seafood processing to short-change workers. Moreover, use of informal labor brokers known as "Calo" undermines implementation of regulations. Jones *et al.*, 2019	
Access to workplaces for third-party monitors (trade union representatives, on-board observers, etc.)	Information about access to seafood workplaces for third-party monitors is limited. Inspections on fishing vessels reportedly focus on equipment and occupational health and safety, and not labor rights. Jones *et al.*, 2019 According to the ILO, Indonesia does not have legislation in place to enable it to carry out inspections of living and working conditions on board foreign flagged fishing vessels in its ports. Additionally, it states that the Ministry of Manpower, which is responsible for labor inspections, has limited access to fishing vessels and fishers. ILO, 2019 No specific information was found for the aquaculture sector. The Directorate General of Labour Inspection Development under the Ministry of Manpower is responsible for labor inspections. ILO, 2017	Jones, K., Visser, D., Humolong Prasetya, J., & Nuriyati, D., 2019, Fish for Export: Working in the wild capture seafood industry in Indonesia. Centre for Trust, Peace and Social Relations, Coventry University ILO, 2019, Indonesia and the Work in Fishing Convention, 2007 (No. 188): a comparative analysis – Working Paper

Indicator	Description	Sources
	It is not clear whether it conducts inspections in the informal sector.	ILO, 2017, Factsheet on Labour Inspection in Indonesia
Worker access to a functional grievance mechanism	According to a study by Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, there is very limited access to grievance mechanisms or unions throughout shrimp supply chains. Except for an international affiliated company in Lampung province, workers were generally found to have limited meaningful and effective platforms to raise concerns. Workers hired through formal working arrangements were better placed to raise concerns compared to informal workers. The ability to engage with grievance mechanisms is further affected by the low awareness among workers of their rights. Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024 Fishers in Indonesia avoid making complaints directly to their employer for fear of repercussions. Trade unions and fishers' associations exist to help fishers make claims about grievances such as unpaid wages. However, a lack of resources and the transient nature of fishers who move from vessel to vessel makes it difficult for these groups to support workers. Access to formal grievance mechanisms in seafood processing factories is limited. Jones *et al.*, 2019	Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024, Net profits, human costs: How supermarkets shape exploitation in shrimp aquaculture. Jones, K., Visser, D., Humolong Prasetya, J., & Nuriyati, D., 2019, Fish for Export: Working in the wild capture seafood industry in Indonesia. Centre for Trust, Peace and Social Relations, Coventry University
Access to join a trade union	Indonesian seafood industry workers have the legal right to form and join trade unions, but the sector poses unique challenges, and the rate of unionization is low. The Law No.13/2003 on Manpower recognizes unions and employer organizations as partners in social dialogue. However, in terms of forced labor	ILO, 2023, The Alignment of Indonesian laws, policies, and their enforcement with the ILO international labour standards on forced

Indicator	Description	Sources
	issues, the Human Trafficking Law and Presidential Regulation No.22/2021 are the primary regulator tools, but these do not position employers' and workers' organizations as social dialogue partners and only indicates a role for community or general society to be included in the effort to eliminate human trafficking. ILO, 2023 The Freedom Fund has written an extensive report on labor rights in Indonesia's seafood sector, including organization of workers and collaboration. The 2024 report states that mainstream unions are absent from the sector, but that there are several membership-based organizations engaging in service provision or, to a lesser extent, in organizing with a focus on either fisher (working in Indonesian waters or overseas) or seafood processing workers. Challenges associated with organizing in the seafood sector consist of low union density and the limited ability of unions to effectively engage with the industrial relations system. Lack of a formal employment relationship of large numbers of workers is also a challenge in challenge in both fishing and seafood processing sectors. Freedom Fund speculates that seafood processing is overlooked by trade unions due to the more isolated locations of processing plants. Next to this, manufacturing unions tend to have a narrow sectoral focus, and the food and beverage unions tend to be relatively weak. Even where unions do exist, a lack of action has led processing workers to perceive them as either passive or aligned with employers rather than advocating for labor rights. For example, there have been instances in Banyuwangi of workers using collective action to fight for their rights who have experienced union-busting and intimidation. This highlights the sometimes-negative perceptions of trade unions by	labour: a Situation and gap analysis, Jakarta: International Labour Office Freedom Fund, February 2024, Labour Rights in Indonesia's Seafood Sector Gearhart, J., and Moynihan, C., 2025. "Upwelling: Fishers Organizing for their Rights and Sustainable Fisheries." Accountability Research Center. Accountability Working Paper 19 Palmer, W., Ford, M., and Hasbiyalloh, B., 2023. "Regulating Recruitment and Contracting of Migrant Fishers from Indonesia." Asian and Pacific Migration Journal 32 (3): 452–74. *Cited in* Gearhart, J., and Moynihan, C., 2025. "Upwelling: Fishers

Indicator	Description	Sources
	seafood processing workers because of the lack of effective action by unions. For fishing, the sea-based nature and high mobility of workers means they are difficult to organize, and work at sea complicates jurisdiction affecting unions' efforts to identify suitable collective bargaining partners and arenas. Due to the characteristics of their employment and the legal frameworks in place, Freedom Fund notes that even local fishers with regular wages have a markedly different standing within Indonesia's industrial relations system compared to other formal sector workers. While the Ministry of Manpower retains oversight of industrial relations and labor dispute resolution within the sector, fishing contracts do not fall under the Manpower Law as their legal foundation. Instead, they are regulated under Marine Affairs and Fisheries Ministerial Regulation No. 33/2021, which covers dispute resolution and gives the Director General of Capture Fisheries authority to facilitate disputes settlement between the fishers and boat owners. Regulations require Indonesian fishers that work abroad to be covered by a collective bargaining agreement (CBA). This offers unions and worker associations an opportunity to engage with fishers before departure and educate them about their rights under both Indonesian law and the law of the flag state. Ship owners or their representatives and seafarers' associations are required to establish a CBA, which must be co-signed by the Ministry of Transportation's Director-General of Sea Transportation, but there is no legal minimum standard for a CBA. Parties can include any clause that does not conflict with the Ministerial Regulation. The CBA model offers leverage in negotiations for unions, a forum for dialogue and representation, and	Organizing for their Rights and Sustainable Fisheries." Accountability Research Center. Accountability Working Paper 19 ILO and National Research and Innovation Agency of Indonesia (BRIN), 2025, Understanding working conditions of fishers in Indonesia: Evidence from the 2024 Survey on Decent Work in Marine Fishing, Geneva: International Labour Office Jones, K., Visser, D., Humolong Prasetya, J., & Nuriyati, D., 2019, Fish for Export: Working in the wild capture seafood industry in Indonesia. Centre for Trust, Peace and Social Relations, Coventry University.

Indicator	Description	Sources
	union financial sustainability. However, there are several issues with CBAs that weaken their effectiveness. CBAs only cover union members and can be used by companies to exert control over unions, especially when advancing member fees. In addition, single agents can hold multiple CBAs with different unions, weaking a union's ability to enforce their agreements and reducing the CBA's effectiveness as an organizing tool. Lastly, if the union that signs the agreement is not trustworthy it may raise concerns of conflicts of interest. Once fishers depart Indonesia, Indonesian based unions have limited channels through which to organize and support them. Options are to engage with the International Transport Workers' Federation (ITF), which is a global union with jurisdiction in the sector, to collaborate with unions in destination countries, or to establish a presence in destination countries. Freedom Fund raises the question whether this can be considered as organizing or servicing. Among Freedom Fund's hotspot partners, member-based organizations that operate most like unions are the Indonesian Fisheries Workers Union (Serikat Pekerja Perikanan Indonesia, SPPI) and the North Sulawesi Fishers Union (Serikat Awak Kapal Perikanan Bersatu Sulawesi Utara, SAKTI Sulut). SPPI was established in 2013 and is considered the strongest registered union that focuses on organizing migrant fishing vessel crews in Indonesia. While its mission statement is to safeguard the welfare by enhancing their working conditions and securing their rights of both local and migrant fishers, until now the focus has been exclusively on migrant fishers. It has a branch office in Pemalang, Central Java, where its activities are concentrated. This includes technical	ITUC Global Rights Index 2020 Report ILO, 2022, ILO Brief—Rough seas: The impact of COVID-19 on fishing workers in South-East Asia Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024, Net profits, human costs: How supermarkets shape exploitation in shrimp aquaculture

Indicator	Description	Sources
	skills training that fishers need to secure a Basic Safety Training certificate, as well as negotiating Collective Bargaining Agreements (CBA's) with manning agencies to ensure fair working conditions and wages. To date, SPPI has negotiated CBAs with 43 agents. Regarding advocacy, it engages in efforts to promote the rights and welfare of fishers through its relationships with various governmental and non-governmental entities, including at local level issues such as fair wage, safe working conditions, safe working conditions, social protection and improved labor rights enforcement. It has approximately 11,000 members. SAKTI Sulut was founded in 2021 and aims to address the challenges faced by fishing crew members and to improve their working conditions, ensure fair wages, and provide legal protection. It operates the most like a mainstream union than any other of Freedom Fund's hotspot partners. It has a clear, time-based mechanism for collecting member dues and establishes clear links between membership and access to union services. Its services include legal assistance, complaints handling and running empowerment programs to support fishing crew members and their families. It coordinated safety training and skills certification programs in collaboration with the City of Bitung Marine and Fisheries Polytechnic and is Freedom Fund's only hotspot partner to pursue local fishers' interests through the formal industrial relations system. In February 2023, it also established a worker association focusing on female seafood processing workers called Srikandi, which had 50 members as of March 2023. In terms of advocacy, SAKTI Sulut collaborates on a local level with the NGO Destructive Fishing Watch (DFW) to engage with provincial-level policymakers and local authorities, which is	

Indicator	Description	Sources
	strengthened at the provincial level by its involvement in DFW's joint inspection. It also actively communicates the concerns of fishing crew members to the public through local and social media. Additional Freedom Fund hotspot organizations include the Indonesian Fishing Workers Association (Asosiasi Pekerja Perikanan and Indonesia, AP2I) and Migrant Workers Union of Indonesia (Serikat Buruh Migran Indonesia, SBMI), both mainly focused on migrant fishers. Their servicing work focuses on educating prospective migrant fishers about essential documents required to work on an international fishing vessel and provide knowledge and skills to advocate for their well-being. Unlike AP2I, SBMI does not engage in CBA negotiations. Both engage in advocacy, but at different levels. NGOs, such as Freedom Fund's hotspot partners like DFW, Indonesia Ocean Justice Initiative and the Surabaya Labour Solidarity Institute (Institut Solidaritas Buruh Surabaya, ISBS) also play an important role in advocacy and service provision in the sector, and in some cases support efforts to organize. Other member-based organizations in the sector that are mentioned by Freedom Fund include: • Federation of Food, Beverage, Tourism, Restaurant, Hotel and Tobacco Workers (Federasi Serikat Buruh Makanan Minuman Pariwisata Restoran Hotel dan Tembakau, KAMIPARHO) • the Indonesian Seafarers' Union (Kesatuan Pelaut Indonesia, KPI) • the Federation of Indonesian Metalworkers Unions (Federasi Serikat Pekerja Metal Indonesia, FSPMI)	

Indicator	Description	Sources
	• the Indonesian Association of Seafarers and Fishers (Kesatuan Pelaut dan Pekerja Perikanan Indonesia, KP3I) • the Indonesian Seafarers' Transportation Union (Serikat Awak Kapal Transportasi Indonesia, SAKTI) • the North Sulawesi Seafarers' Union (Serikat Pelaut Sulawesi Utara, SPSU), and • Transparency House (Rumoh Transparansi). Of these, KAMIPARHO has member unions in seafood processing in North Jakarta, Bitung and the Aru Islands, and has been working with the ILO to promote women workers' rights in the sector. One of the sectoral unions within FSPMI, known as the Shipping and Maritime Services Workers Union (Serikat Pekerja Perkapalan dan Jasa Maritim, SPPJM), claims to have an emerging interest in organizing fishers, having expanded its initial focus from dock and shipbuilding and repair workers to include crews on various kinds of ships, including fishing vessels, as well as aquaculture workers in 2021. However, Freedom Fund notes that its progress has been hindered by limited internal resources and difficulties organizing new worker groups amid the pandemic. Freedom Fund, February 2024 The May 2025 Accountability Working Paper on Upwelling: Fishers Organizing for their Rights and Sustainable Fisheries also includes Indonesia and mentions the three registered trade unions covered by Freedom Fund (SAKTI Sulut, SBMI and SPPI) describing their activities in a similar way. The paper highlights that over the past eight to ten years, Indonesian fishers have gained from a significant increase in both direct and indirect external funding through programs such as the Safe Seas Project (funded by the US Department of Labor), the ILO's	

Indicator	Description	Sources
	Ship to Shore Rights Project, and the Freedom Fund and that beneficiaries include trade unions. The report states that unions' differences in approaches to support fishers make it hard to build collective power and effectively challenge employers. Strong democratic structures and the capacity to represent fishers are needed, which is difficult due to limited contact with migrant fishers outside of pre-departure training or grievance support. At present, union collaboration is focused on specific advocacy goals. There is an interest by some unions in becoming affiliated with the ITF, which could strengthen their internal organization and ability to negotiate with employers. Other issues reported to affect organization of Indonesian fishers in the industrial sector include migration policy incoherence, policy contradictions in domestic fisher protections and lack of port-based protections. Recently, a group of NGOs and fisher unions came together to form a coalition to advocate for Indonesia's ratification of ILO Convention 188 on work in fishing. This process could both advance the Convention and strengthen collaboration across the expanding network of fisher organizations. Additionally, the report notes that fisher unions are focused on improving regulations of Indonesian recruitment agencies but engagement with the direct employers is limited. Indonesian recruitment agencies link fishers to international recruitment agencies, which then assign them to foreign vessels (Palmer, Ford, and Hasbiyalloh, 2023). Fishers are often unaware until a couple of days in advance which flag they will depart under. This lack of transparency in recruitment and the supply chain makes it difficult to hold buyers and retailers accountable.	

Indicator	Description	Sources
	Gearhart and Moynihan, 2025 Other reports also highlight the low unionization rates and issues surrounding union busting and intimidation. A 2024 survey among 3,500 fishing workers found a low union membership rate, averaging at 10%. Membership rates are lower for fishers working on medium vessels (8.6%) and large vessels (9.6%), as they are typically internal migrant workers come from areas outside the port region and lack connections with local unions. Union membership rates are highest for workers on small vessels at 12.6%, although this rate is still low, with those workers found to be more inclined to participate in fisher associations. Reported reasons for low unionization rates included the fishers' lack of time to participate and low awareness regarding the benefits of trade union membership, an unwillingness to pay membership dues, or simply a lack of interest. ILO, 2025 Although trade unions exist, fishers in Indonesia are rarely unionized, while processing workers are somewhat better organized. In either case, unionization levels are considered low. Discrimination against workers trying to organize occurs; evidence was found from one seafood processing factory in East Java of workers being dismissed after trying to organize. Jones *et al.*, 2019 In May 2019, Reni Desmiria, secretary of the SPBMI (BMI Workers' Union) and a contract worker at a seafood processing plant in Lampung, was arrested and later imprisoned for allegedly using a false education certificate to get her job at the plant. Most workers at the factory were employed on	

Indicator	Description	Sources
	nonpermanent contracts and did not have social security or healthcare coverage. The arrest notably occurred after she had enrolled many workers in the government's mandatory health insurance scheme. After the arrest, she was told that she would be released if she quit her position at the company, but she refused and went on to be sentenced to four months imprisonment. ITUC Global Rights Index 2020 Report Union representation among commercial fishermen in Asia is notably scarce. Migrant fishermen, though theoretically allowed to form associations in most nations, encounter substantial practical impediments to their engagement with worker organizations. These obstacles include unspoken legal bans, restrictions in the operational scope and capabilities of unions, negative attitudes toward migrant workers, employer suppression, and the absence of legal recognition. For instance, in Indonesia, the extensive coastal fishing sector sees limited organization of fishermen who are affiliated with Kesatuan Pelaut Indonesia, the Indonesian Seafarer's Union. While they engage in tripartite policy discussions, they have not yet achieved collective bargaining agreements with employers. ILO, 2022 Shrimp farm workers in Lampung who were raising grievances through the trade union were reportedly explicitly intimidated by the company, which threatened to dissolve the trade unions. Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024	
Participation in voluntary schemes and implementation	In relation to aquaculture and processing, there are several shrimp producers, producer groups and processors involved in voluntary certification schemes such as Best Aquaculture Practices (BAP)	BAP, BAP Certified Aquaculture Producers

Indicator	Description	Sources
of comprehensive corporate policies and strategies to combat forced labor, human trafficking, and hazardous child labor	and Aquaculture Stewardship Council (ASC), which address human rights issues issues including forced labor, human trafficking, and hazardous child labor within the program Standards on both the production and processing level. As of 1st of April 2025, there were: • 50 BAP-certified farms of which 46 produced shrimp, three produced tilapia farms, and one produced barramundi. • 13 ASC Farm certificates, including three multi-sites and one group certificate, representing a total of 583 farm sites. Two certificates (five sites) concerned tilapia, while the remainder concerned shrimp farms. Two shrimp farms are in assessment for certification. BAP , ASC As of 1st of April 2025, there were also two completed ASC Aquaculture Improvement Projects for two farms and one project for two farm sites in process. All projects concerned shrimp farms. ASC, Find an AIP There is a shrimp producer group that has received Fair Trade certification. However, it is unclear whether this producer group still holds this certification. Seafood Source, 2022 The OXFAM Gender Transformative & Responsible Business Investment in South East Asia (GRAISEA II) project in Indonesia seeks to enhance the standard of living and resilience of shrimp farmers in the coastal areas of South Sulawesi and East Java. The initiative focuses on supporting small-scale shrimp farmers to participate and benefit equitably from economic opportunities in the agricultural and seafood value chain through an inclusive business model. OXFAM	ASC, Find an ASC certified farm ASC, Find an AIP Seafood Source, 2022, Indonesian shrimp cooperative gets Fair Trade certification OXFAM Indonesia, n.d., GRAISEA II - Investment for women's development and responsible agriculture BEAM Exchange, 2022, Programme profile GRAISEA 2: Gender Transformative & Responsible Business Investment in South East Asia The Freedom Fund, 2023, Indonesia Hotspot report

Indicator	Description	Sources
	Indonesia, n.d. The project (GRAISEA II) concluded in 2023. Reported results include, among others, improving the capacity of 29 new and existing shrimp producer groups and cooperatives to serve members, and three major buyers providing producer groups with technical and financial support. BEAM Exchange, 2022 However, it is unclear how many of these concerned Indonesian farmers. In relation to fisheries, multiple initiatives and organizations exist as well as participation in voluntary certification schemes. These include fishery associations, corporate efforts and third-party certification and improvement projects, for which more information can be found in the SSRT's tropical tuna risk profile. The Hotspot Indonesia initiative, collaboratively executed by Humanity United and the Freedom Fund, focusses on addressing incidents and risks of forced labor and related labor abuses in Indonesia's domestic wild capture fisheries, its processing sector and Indonesian migrant fishers abroad. Up until April 2023, the initiative and its partners delivered social and legal support services to 710 workers and offered support to 14 worker groups, networks, or unions, benefiting around 300 workers and assisting with 140 legal cases. The Freedom Fund, 2023	

Table 2: Indonesia - Seafood industry-level indicators

Indonesia: Aquaculture Indicators

Indicator	Description	Sources
Direct evidence of Forced labor, human trafficking, and hazardous child labor	No direct evidence was found for forced labor, human trafficking, and hazardous child labor specifically in shrimp aquaculture.	
ILO indicators of forced labor and ILO R190 definition of hazardous child labor	No indicators of hazardous child labor were identified for shrimp aquaculture. However, a study conducted by Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM in 2024, which included visits to 12 shrimp farms in the provinces West Java, South Sulawesi, East Java, Lampung, NTB, and Bali, and interviews with 49 workers, asserts the presence of several indicators of forced labor. The study identifies abuse of vulnerability as an overall finding for all supply chain segments, through informal hiring practices. This deprives workers of labor protection policies and social benefits such as minimum wage, insurance, and freedom of association. Many shrimp farm workers (including extensive, semi-intensive, and intensive farms) were found to be employed as daily gig workers. Other indicators of forced labor identified for shrimp farms included: • Deception during the recruitment processes by falsely promising certain income and employment status. This was found to be most pronounced for internal migrant workers from other provinces in Indonesia. In some cases, where workers were recruited with promises of permanent and directly hired jobs, they were	Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024, Net profits, human costs: How supermarkets shape exploitation in shrimp aquaculture

Indicator	Description	Sources
	instead hired by an outsourcing company, engaged as contract workers, or seasonal workers and performance-based workers. • The withholding of wages, restriction of movement, isolation and excessive overtime. While most of the interviewed workers were able to leave or change jobs, workers are directly or indirectly restricted to doing so through withholding bonuses, and in some cases wages as well. Bonuses were found to be used across all sites as a primary retention tool, which suggests that the bonus system is an integral part of the compensation structure, and forces workers to stay, anticipating this additional income despite potentially challenging conditions. This may suggest that basic wages are not sufficient to meet workers' needs and make the bonus a crucial part of their income. In addition, certain tasks or responsibilities bind workers to stay onsite. For example, standard operating procedures require feeders to remain on standby 24 hours a day during production, restricting their freedom of movement. This leads to isolation, especially for workers living in the company's compound/complex or where they are required to stay overnight on the farm during production season. • Debt bondage affected workers at almost all sites. Interviewed workers reported to be indebted to "loan sharks" or banks, preventing them quitting their jobs. These loan sharks operate outside the law and offer loans at extremely high or even illegal interest rates with strict terms of collection, with repayment	

Indicator	Description	Sources
	enforced generally through threats of violence or other illegal, aggressive, and extortionate actions. Workers are forced to seek alternative sources of income when wages are extremely low. By turning to moneylenders, they become trapped in a cycle where they must continue to work at the peeling sites to repay their loans, with no other viable livelihood options available. This situation was prevalent in most interviews with workers at traditional and semi-intensive farms. In some regions workers requested advance payments of wages due to limited disposable income. • Instances of threats and intimidation. Examples are given in the report from a company in Lampung where workers who were raising grievances through the trade union were intimidated and the company threatened to dissolve the trade union. Another example is from a company which is informally backed by state-apparatus that allegedly organized "character-building sessions" with Indonesian armed forces personnel as the mentor, though further information on what this entailed is not reported. The report further states that on traditional family farms, workers' children aged 10-15 years were found to be assisting with feeding, with work usually performed in the afternoon for about two to four hours. The report does not indicate whether the work is considered hazardous. It also refers to two cases where a migrant shrimp farm worker and a migrant workers' child died. While the deaths are not a result of workplace accidents or maltreatment, conditions such as abusive working	

Indicator	Description	Sources
	and living environment, financial constraints, and lack of social protection may have exacerbated the situation. Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024	
Labor supply in the domestic market	An estimated 3.9 million people were directly involved in aquaculture in 2016, although no distinction was made between fish and shrimp production. Based on national statistics, shrimp only forms a quarter of the total shrimp and fish production volumes. Women are estimated to account for only 1% of the workforce in shrimp aquaculture. The projected growth in aquaculture is expected to create 8.9 million full-time jobs by 2030. Infrastructure Improvement for Shrimp Aquaculture Project: Poverty, Gender Equality, and Social Impact Assessment, 2022	Poverty, Gender Equality, and Social Impact Assessment - Infrastructure Improvement for Shrimp Aquaculture Project, 2022
Aquaculture Characteristics	Isolation of the site Indonesia shrimp farms are spread over the country's multiple islands. As a result, the farms tend to be isolated in terms of access to hatcheries, feed mills and processors, and are therefore highly dependent on intermediaries. Boston Consulting Group, 2019 There are also some evidence sources that touch upon the issue of limited and disruptive power supply, which could lead to clashes between farm operations and community electrical energy needs, which can be linked to isolation of farm sites. Boston Consulting Group, 2019 , INFID, 2022 Although not directly commenting on site isolation itself, workers have been described to be isolated by being restricted in their freedom of movement. This was reportedly the case for workers living on the company's compounds or those required to stay overnight on the farm during the production season.	A Strategic Approach to Sustainable Shrimp Production in Indonesia, 2019, Boston Consulting Group INFID, 2022, FINAL REPORT BUSINESS AND HUMAN RIGHTS IN THE FISHERIES SECTOR: The Role and Support of Stakeholders in Shrimp Aquaculture Perkumpulan Migunani lan

Indicator	Description	Sources
	Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024	Mberkahi, AKATIGA and ELSAM, 2024, Net profits, human costs: How supermarkets shape exploitation in shrimp aquaculture
	Child-adult ratio in aquaculture communities Shrimp aquaculture is a male dominated sector, where women and children participate in roles such as feeding and harvesting for household consumption. In cases where women are literate and financially capable, they may be in involved in management of farm records and finances. In intensive systems, the roles of women may also include weighing shrimp feed, measuring water quality and temperature and laboratory testing. Overall, women do less physical and technical tasks but are involved in pricing and selling products at local markets. Some companies hire female technicians and managers. Infrastructure Improvement for Shrimp Aquaculture Project: Poverty, Gender Equality, and Social Impact Assessment, 2022 A 2022 report by the International NGO Forum on Indonesian Development (INFID) highlights the lack of recognition of women's involvement in shrimp aquaculture activities, including being actual shrimp farmers, by both the state and society. INFID, 2022 According to a study by Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM in 2024, which included visits to 12 shrimp farms in the provinces West Java, South Sulawesi, East Java, Lampung, NTB, Bali, men dominate the shrimp farming sector. Farm workers and technicians were found to be men	Poverty, Gender Equality, and Social Impact Assessment - Infrastructure Improvement for Shrimp Aquaculture Project, 2022 INFID, 2022, FINAL REPORT BUSINESS AND HUMAN RIGHTS IN THE FISHERIES SECTOR: The Role and Support of Stakeholders in Shrimp Aquaculture Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024, Net profits, human costs: How supermarkets shape exploitation in shrimp aquaculture

Indicator	Description	Sources
	around 20-50 years old. Women on the farm were restricted to cooking. In the traditional, family-managed farm, female family members and children may help with feeding. Children between the ages of 10-15 years were reportedly found to be assisting with feeding. Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024	
Workforce Characteristics	The proportion of low-skilled migrant workers Little information was found on the presence of low-skilled migrant workers. In general, the "lowest level" of workers such as feeders at shrimp farms reportedly hold a lower level of education ranging from elementary up to junior/senior high school . Workers employed at the technician or administrative level holddiplomas or university degrees or junior high school degrees plus more experience. Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024 According to Accenture, for intensive production, farm owners hire experienced technical staff from other parts of Indonesia or from abroad, leaving only low-skilled jobs, such as harvesting and watchmen, for local people. Accenture, 2013 The use of hired labor in small-scale family operated businesses is low. A study in several provinces in Indonesia found that in Lampung, some farm owners that grow whiteleg shrimp in semi-intensive systems that have more than three ponds employ workers for the day-to-day farm operations. In South Sulawesi, where giant tiger shrimp was cultured in extensive ponds, one worker is needed to take care of one pond	Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024, Net profits, human costs: How supermarkets shape exploitation in shrimp aquaculture. Exploitative Labor Practices in the Global Shrimp Industry, 2013, Accenture Research paper: Study of the impact of intermediaries on environmental and social outcomes and worker vulnerability in small-scale fishing and aquaculture in Indonesia and Viet Nam, 2020, ILO and Monterey Bay Aquarium

Indicator	Description	Sources
	with an average size of 10 hectares. ILO and MBA, 2020 A Wageningen University thesis study found that most traditional, low-input shrimp farms do not hire workers, while semi-intensive and intensive farmers recruit from 1 up to 20 workers between the ages 17 to 50 years. Fitriani, 2018	Sustainable Supply Chain Analysis of Shrimp in Indonesia to meet European Market Demand, 2018, M. Fitriani
	Legal presence/regularity of migrant workers There is some evidence of internal migrant workers being employed in the shrimp supply chain. A study by Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM in 2024, which included visits to 12 shrimp farms in the provinces West Java, South Sulawesi, East Java, Lampung, NTB, and Bali, indicates the presence of internal migrants. According to the study, 14% of workers interviewed on shrimp farms and in peeling shed were internal migrant workers, having been recruited from a distant province. Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024	Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024, Net profits, human costs: How supermarkets shape exploitation in shrimp aquaculture
Recruitment and Contracts	Use of recruitment agents Limited information was found but indicates that shrimp farm workers are mainly recruited informally via word of mouth. Among most of their research sites, farm workers tended to be recruited from the same district where the farms were located, which was attributed to local government's requirement or demand from the local informal authorities. In total, 86% of interviewed shrimp farm workers were hired locally. Shrimp feeders were often recruited by word-of-mouth. There generally is no formal contract, and workers	Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024, Net profits, human costs: How supermarkets shape exploitation in shrimp aquaculture

Indicator	Description	Sources
	were relatively free to leave the job and rejoin between seasons if they remained in good standing with their employer. In these cases, the researchers did not find evidence of debt bondage. According to the report, there are examples where local governments facilitate the recruitment of farm workers and skilled labor positions are sometimes advertised. Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024	
	Contract-and compensation- related regulations and practices According to a study by ILO and Monterey Bay Aquarium in different provinces in Indonesia, farm workers in Lampung were reported to get paid IDR2 million a month on average plus a fee/share of IDR500 per kilogram of harvest. In South Sulawesi, workers were paid IDR125,000 a month and receive a share of 10% of the gross value of the harvest once a year. Here the work is considered part-time work and averaged two hours per day (extensive production). In both study groups, the workers did not have official contracts in place, only agreements on payment and fees. Farmers in certain areas in Indonesia were also reported to get financial support from '*pembinas*' to cover operational costs in exchange for proportional payment for every kg of harvested shrimp. The study found no indication of debt bondage, as farmers were free to sell to the highest bidder of their choice, and debt was not driven by the *pembina* created loan system or price setting but rather crop failures. ILO and MBA, 2020 According to a study conducted by Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM which	Research paper: Study of the impact of intermediaries on environmental and social outcomes and worker vulnerability in small-scale fishing and aquaculture in Indonesia and Viet Nam, 2020, ILO and Monterey Bay Aquarium Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024, Net profits, human costs: How supermarkets shape exploitation in shrimp aquaculture

Indicator	Description	Sources
	visited 12 shrimp farms in six provinces, all these shrimp farms used gig workers and informal employment practices, wherein workers were hired for daily positions. Workers are hired without formal contracts and experience little transparency on payment rate and unpaid overtime. The report alleges that informal farm workers receive inadequate compensation for their labor, leading to financial struggles. Feeders' monthly wages were found to be below the local minimum wage in most locations, because of their informal status, and rarely received harvest time bonuses. For 10-12 hours of work gig workers, most likely referring to temporary workers, receive around USD $3.75 per day. Workers are at risk of debt bondage because of low wages as they would take out loans from banks or "loan sharks" or asking advanced salary payments due to limited disposable income. Workers that work under formal employment contracts are reported to earn wages at least equal to the minimum wage in their respective provinces. Perkumpulan Migunani Ian Mberkahi, AKATIGA and ELSAM, 2024	

Table 3: Indonesia - Aquaculture Indicators

Indonesia: Processing indicators

Indicator	Description	Sources
Direct evidence of forced labor, human trafficking, and hazardous child labor	No direct evidence of forced labor, human trafficking, and hazardous child labor in shrimp processing was found.	
ILO indicators of forced labor and ILO R190 definition of hazardous child labor	There is evidence describing indicators of forced labor and potentially hazardous child labor in shrimp processing. Oxfam International has reported practices in shrimp processing facilities in Indonesia that are indicators of forced labor such as inadequate provision or denial of water and/or toilet breaks, too high daily quota's forcing workers to skip breaks, needing to work overtime to be paid minimum wage, unpaid overtime, mandatory pregnancy tests, verbal abuse, and access to effective trade unions limited. Oxfam, 2018 A study by the Freedom Fund conducted among 60 seafood processing workers in Indonesia, which included shrimp processing facilities, found there was little oversight of workplace safety and frequent reports of hand injuries due to inadequate safety precautions. In some facilities, workers had to purchase their own personal protective items. Workers on short-term contracts tended to lack access to subsidized accident and health insurance by the employer under the national insurance scheme. This condition compels workers to work while ill to maintain their income. As the study covered more than just shrimp facilities and did not give any distinction between types of processing facilities, it is not clear to	Oxfam, 2018, Ripe for Change: Ending human suffering in supermarket supply chains Freedom Fund, February 2024, Labour Rights in Indonesia's Seafood Sector INFID, 2022, FINAL REPORT BUSINESS AND HUMAN RIGHTS IN THE FISHERIES SECTOR: The Role and Support of Stakeholders in Shrimp Aquaculture Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024, Net profits, human costs: How supermarkets shape

	what extent this applies to shrimp processing. Freedom Fund, February 2024 A report by the International NGO Forum on Indonesian Development (INFID) identifies women as a vulnerable group in the shrimp supply chain, citing an Oxfam study from 2018 (reference not provided), which found that women working in shrimp processing units were denied rights by not receiving proper protective equipment or adequate sanitation. They were also subjected to long working hours as work targets were set high. INFID, 2022 According to a study conducted by Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM in 2024, which included eight cold storage/final processing and exporters segments within the shrimp supply chain in Bali, South Sulawesi, East Java, Banten, and Lampung and interviews with 16 staff and five managers, workers reported to work long hours of 10 to 14 hours a day in order to meet their targets. Children aged between 10-15 have been reported to assist with peeling activities, usually performed in the afternoon for about two to four hours of their day. The report does not mention whether the work is considered hazardous but indicates that children may indirectly feel compelled to help their parents meet production targets. Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024	exploitation in shrimp aquaculture
Processing Characteristics	Processing stage Most of Indonesian shrimp export consists of raw frozen product, including Head-Less Shell On (HLSO) whiteleg shrimp, including easy peel (EZP), and value-added product, including cooked and breaded. Shrimp Insights, 2024 The study by Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM in 2024, indicates the presence	Shrimp Trade Data Update | May 2024, Shrimp Insights 2024 Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024, Net profits, human

	of shrimp peeling sites and distinguishes between early processing/shrimp peeling (typically referred to as pre-processing) and final/export processing. Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024	costs: How supermarkets shape exploitation in shrimp aquaculture
	Consolidation and vertical integration The level of consolidation and vertical integration varies in the Indonesian shrimp supply chain. There are just a few vertically integrated companies that have their own feed mills, hatcheries, farms, processors, and export facilities, and mid-size players that own farming, processing and export facilities and in some cases hatcheries. Most of the supply chain, however, is not integrated, and there is a high dependence on middlemen to provide raw material inputs to processing plants. Boston Consulting Group, 2019 The study by Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM in 2024, indicates the presence of shrimp peeling sites and makes a distinction between early processing/peeling and final/export processing. Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024	A Strategic Approach to Sustainable Shrimp Production in Indonesia, 2019, Boston Consulting Group Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024, Net profits, human costs: How supermarkets shape exploitation in shrimp aquaculture
	Domestic versus export According to the Boston Consulting Group, domestic demand for shrimp is around 40% of the total production. Boston Consulting Group, 2019 Indonesia's average yearly consumption of fresh shrimp was reported to be 0.676 kg per capita in 2018. CEIC	A Strategic Approach to Sustainable Shrimp Production in Indonesia, 2019, Boston Consulting Group Indonesia Average Weekly Consumption per Capita: Fish: Fresh Shrimps: Shrimp, CEIC Data

Workforce Characteristics	Skilled versus low-skilled A study by the Freedom Fund conducted amongst 60 seafood processing workers, which included shrimp processing workers although the exact amount is not clear, found that a significant number of workers have low levels of education, limiting their employment opportunities. Several women interviewed had not completed primary school. All that is needed to work as a shrimp peeler in North Jakarta is a national identity card. Freedom Fund, February 2024 Peelers in processing reportedly have received lower level of education such as junior/senior high school and in some cases just elementary school. Workers at the technician or administrative level have some diploma or university degree. Workers with a junior high school degrees and more experience can also be found at this level. Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024	Freedom Fund, February 2024, Labour Rights in Indonesia's Seafood Sector Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024, Net profits, human costs: How supermarkets shape exploitation in shrimp aquaculture.
	The proportion of women in the workforce A 2018 Oxfam report uses secondary sources to estimate that between 80-90% of workers in seafood processing plants that were contracted through outsourcing companies are women. Oxfam, 2018 A later study on poverty, gender equality, and social impact assessment undertaken during the preparation and design of the Infrastructure Improvement for Shrimp Aquaculture Project that mentions that there are 1.7 times more women in shrimp processing than men. Infrastructure Improvement for Shrimp Aquaculture Project: Poverty, Gender Equality, and Social Impact Assessment, 2022 Shrimp peeling is female dominated according to the study by Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM. It further reports that peeling workers in Lampung are mostly married and unmarried	Supermarket responsibilities for supply chain workers' rights, 2018, Oxfam Poverty, Gender Equality, and Social Impact Assessment - Infrastructure Improvement for Shrimp Aquaculture Project, 2022 Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024, Net profits, human

	women between 20-40 years. Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024	costs: How supermarkets shape exploitation in shrimp aquaculture
	The proportion of migrant versus local workers Limited information was found. A study by Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM in 2024, indicates presence of internal migrants in shrimp peeling. The study states that 14% of workers interviewed on shrimp farms and peeling sheds were recruited from a distant province. Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024	Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024, Net profits, human costs: How supermarkets shape exploitation in shrimp aquaculture.
	The proportion of minority or indigenous workers Unknown.	
	The proportion of temporary and contract versus permanent workers A study conducted by the Freedom Fund which involved 60 seafood processing workers including shrimp processing, found that a lot of seafood processing workers are employed on an informal basis and are paid on the amount of shrimp processed. As the study covered more than just shrimp facilities and did not give any distinction between types of processing facilities, it is not clear to what extent this applies to shrimp processing. Freedom Fund, February 2024 An earlier study conducted by Oxfam among primarily women workers at a few of the largest shrimp and other seafood exporters in Indonesia - although exact composition is not clear, had interviewees reporting that another processing company structurally gave workers a series of short-term contracts of around	Freedom Fund, February 2024, Labour Rights in Indonesia's Seafood Sector Supermarket responsibilities for supply chain workers' rights, 2018, Oxfam Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024, Net profits, human costs: How supermarkets shape

	two months, which is in violation of Indonesian labor laws, leaving workers vulnerable and at risk of losing their job at any time. By using temporary contracts women were effectively denied access to trade union representation and do not have benefits such as severance pay. Oxfam, 2018 According to a study conducted by Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM in 2024, which included interviews with 16 staff and five managers at eight facilities in the cold storage/final processing and exporters segment in five provinces, at least 25% of the workers were seasonal workers. Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024	exploitation in shrimp aquaculture
	Workers' origins Little information has been found. Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM reports that in their study that 86% of workers interviewed in shrimp farms and peeling sites were hired locally, and that the remaining 14% of shrimp farm workers and peeling shed workers were internal migrant workers recruited from a distant province. Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024	Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024, Net profits, human costs: How supermarkets shape exploitation in shrimp aquaculture
	Migrant worker language (vs. dominant language in the industry) Unknown. Internal migrant workers were reported to be from a distant province. Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024 While Bahasa Indonesia is the official national language, most Indonesians speak other languages, such as Javanese and Sudanese, as their native language. World Atlas, 2017	Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024, Net profits, human costs: How supermarkets shape exploitation in shrimp aquaculture World Atlas, What Languages Are

		Spoken In Indonesia?, 2017
	GDP per capita of processing country and main worker source country Unknown.	
	Legal presence (regularity) of migrant workers Unknown. Internal migrants from a distant province were identified in some peeling sheds. Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024 No information was found on whether foreign migrant workers are employed in shrimp processing plants. Indonesia's constitution guarantees freedom of movement for its citizens, and there are no formal legal barriers preventing people from relocating within the country. World Intellectual Property Organization, n.d.	Migunani lan Mberkahi, AKATIGA and ELSAM, 2024, Net profits, human costs: How supermarkets shape exploitation in shrimp aquaculture World Intellectual Property Organization (WIPO), The 1945 Constitution of the Republic of Indonesia, Department of Information, Republic of Indonesia 1989
	The ability of migrant workers to change jobs Unknown. No information was found on whether shrimp processing plants workers include foreign migrant workers, and subsequently what their ability is to change jobs. However, as indicated in the 'Skilled versus low-skilled' indicator there is evidence indicating that shrimp processing workers have low	

	levels of education limiting their employment opportunities.	
Recruitment and Contracts	Use of contractors and recruitment agents A study conducted by Oxfam among 100 primarily women workers at a few of the largest shrimp and other seafood exporters from Thailand and Indonesia – although exact composition is not clear, encountered the use of subcontractors and cases of sub-contracted employment and informal or temporary contracts, which limits the company responsibility to these workers and violates Indonesian laws on outsourcing. Oxfam, 2018 Although workers in large seafood processing factories should benefit from labor regulations that bans repeated short contracts, a study conducted by the Freedom Fund which involved 60 seafood processing workers including shrimp processing, found that most workers have little protection. Many seafood processing workers, including workers in shrimp processing facilities, are employed on an informal basis and are paid according to the quantity of shrimp processed. Workers with more formal arrangements tend to be employed on rolling short-term contracts and therefore miss out on benefits afforded to permanent employees, regardless of them doing the same work for a decade or more. Some women are reported to prefer piecework because it allows them to respond to unanticipated events such as sickness or childcare in the household. As the study covered more than just shrimp facilities and did not distinguish between types of processing facilities in the findings, it is not clear to what extent this applies to shrimp processing. Freedom Fund, February 2024 According to a study conducted by Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM in 2024, which included interviews with 16 staff and five	Supermarket responsibilities for supply chain workers' rights, 2018, Oxfam Freedom Fund, February 2024, Labour Rights in Indonesia's Seafood Sector Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024, Net profits, human costs: How supermarkets shape exploitation in shrimp aquaculture

	managers at eight facilities in the cold storage/final processing and exporters segment across five provinces, at least 25% of the workers were sourced from traditional or informal middlemen for seasonal jobs. While the study did not further investigate whether the middlemen charged recruitment fees, an anecdotal comment from a former worker indicated that they had to give money to the local strongmen after receiving their pay. Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024	
	Compensation method There are reports, albeit more than five years' old from women in Indonesian shrimp processing plants of working unpaid hours to meet their 19kg/hour target to earn the minimum wage. Oxfam, 2018 The 2024 Freedom Fund report appears to suggest that most of the processing workers are paid through a piece rate system, which could result in similar concerns to those highlighted by the 2018 Oxfam study above. As the Freedom Fund study covered more than just shrimp facilities and did not distinguish between types of processing facilities, it is not clear to what extent this applies to shrimp processing. Freedom Fund, February 2024 The study conducted by Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM reports that most of the workers in the processing/export stage had formal employment arrangements and their field work indicated that all workers under formal employment contracts reported receiving wages at least equal to the minimum wage in their respective provinces. In processing/peeling the payment scheme is a performance-based fee. However, to earn the minimum wage, workers reported having to work more than the standard eight-hour workday, commonly at least 12 hours and sometimes up to 14	Supermarket responsibilities for supply chain workers' rights, 2018, Oxfam Freedom Fund, February 2024, Labour Rights in Indonesia's Seafood Sector Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024, Net profits, human costs: How supermarkets shape exploitation in shrimp aquaculture

	hours per day, to meet their performance targets and are not compensated for additional hours worked. The report although mentions “loyalty hours”, where workers work unpaid overtime as proof of loyalty to the employer. Perkumpulan Migunani lan Mberkahi, AKATIGA and ELSAM, 2024	

Table 4: Indonesia - Processing indicators

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