

Seafood Watch, Liberty Asia & Sustainable Fisheries Partnership: Seafood Slavery Risk Tool

Fishery Profile Data Analysis

January 24, 2018

Revised February 28, 2018 – **The Seafood Slavery Risk Tool’s country criteria has been revised. The revision does not change the risk rating for this fishery.**

Revised August 22, **2018: In the 2018 U.S. Department of State’s Trafficking in Persons Report (TIP), Thailand was upgraded from Tier 2 Watch List to Tier 2.** The TIP rating change does not change the CRITICAL RISK rating for Thailand fishmeal fishery.

Profile Name¹ and Risk Rating

Species ²	Country ³	Risk rating
Fishmeal, Multiple Species	Thailand	CRITICAL

1. Profile names denote species name and country.
2. The Seafood Slavery Risk Tool uses the [Food and Agriculture Organization’s](#) (FAO) species names. For scientific and other species names, please see below.
3. “Country” refers to the flag state of vessels and/or the country where the catch is landed. The Seafood Slavery Risk Tool uses [FAO data](#) as its primary source for determining this information.

Profile Fishery Information

Other species names	Biomass, “trash fish,” feed fish
Risk rating	CRITICAL
Location	Multiple Exclusive Economic Zones (EEZs)/territorial waters, including Thai, Indonesia, Mauritius, Papua New Guinea (PNG) EEZs; High Seas

Fishmeal, Multiple Species, Thailand

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Legal Disclaimer: The profiles and ratings(s) provided in the Seafood Slavery Risk Tool are for information purposes only and do not constitute business, legal, market, financial, or investment advice. Users of the Risk Tool, the profiles, and the ratings must seek separate advice and guidance.

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FAO fishing area(s)

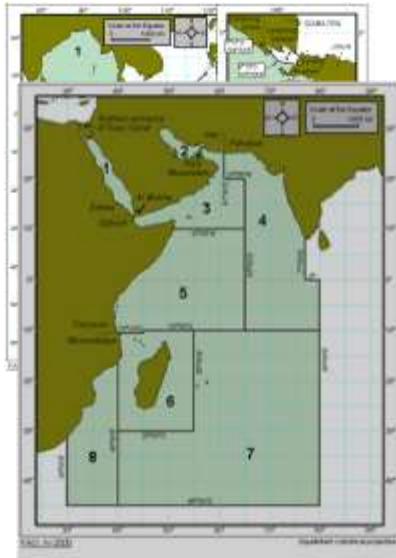
Major Fishing Area 71 includes the Gulf of Thailand, Indonesian waters, Malaysian waters, and the Dog Leg Bank.



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FAO Major Fishing Areas. PACIFIC, WESTERN CENTRAL (Major Fishing Area 71). CWP Data Collection. In: FAO Fisheries and Aquaculture Department [online]. Rome. Updated October 1, 2004. [Cited January 23, 2018].

Major Fishing Area 57 includes, among others, the Andaman Sea and Eastern Indian Ocean.



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FAO Major Fishing Areas. INDIAN OCEAN, EASTERN (Major Fishing Area 57). CWP Data Collection. In: FAO Fisheries and Aquaculture Department [online]. Rome. Updated October 1, 2004. [Cited January 23, 2018].

Major Fishing Area 51 includes Saya de Malha Bank.

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FAO Major Fishing Areas. INDIAN OCEAN, WESTERN (Major Fishing Area 51). CWP Data

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	Collection. In: FAO Fisheries and Aquaculture Department [online]. Rome. Updated October 1, 2004. [Cited January 23, 2018]. To view all FAO Major Fishing Areas, see http://www.fao.org/fishery/area/search/en .
Governance	<p>RFMOs include:</p> <p>Asia Pacific Fisheries Commission (APFIC) http://www.fao.org/figis/geoserver/factsheets/rfbs.html</p> <p>Commission for the Conservation of Southern Bluefin Tuna (CCSBT) http://www.fao.org/figis/geoserver/factsheets/rfbs.html</p> <p>Southern Indian Ocean Fisheries Agreement (SIOFA) http://www.fao.org/figis/geoserver/factsheets/rfbs.html</p> <p>The Thai fleet targeting multiple species for fishmeal is mobile and may operate in more EEZs and RFMO areas than listed here. Of the listed RFMOs, Thailand is party to the APFIC and SIOFA.</p>
Flag state	<p>Thailand</p> <p>Vessels under flags other than Thai may also supply inputs to the fishmeal production in Thailand. This profile focused on Thai flagged vessels.*</p>
Method	<p>Single and twin trawl, purse seine</p> <p>For more information, see FAO Fishing Gear Types.</p>

* There are reports of “ghost ships” in the Thai fleet, which are vessels with no flags or multiple vessels with the same name. For example, see: <https://www.theguardian.com/global-development/2016/dec/15/thai-fishing-industry-human-rights-abuses-continue-in-unpoliced-waters-greenpeace-claims>

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Decision Tree/Evidence

Is there credible evidence of forced labor, human trafficking, or hazardous child labor in the profile fishery?

YES

Source URL	Source type	Year published	Summary of findings	Any remarks on the credibility of this source?
Guardian (2014)	Media: The Guardian	2014	<p>“Base article” from an extensive Guardian investigative series on slavery on board Thai vessels. (For a summary of the series, please refer to the 2016 summary article in the following table.)</p> <p>The article is based on the journalists’ 6-month investigation. It documents specific cases of Myanmar slaves on board Thai vessels that land “trash fish” in Thai ports for processing into fishmeal in Thai factories.</p>	The Guardian is internationally recognized for high-quality investigative journalism.
EJF (2015)	NGO report: Environmental Justice Foundation	2015	This report documents the use of forced labor on board vessels from Kantang that fish for “trash fish” for fishmeal production.	In-depth field research, which includes documented cases that directly link forced labor to fishing for “trash fish” used in Thai fishmeal.
Verité (2015)	NGO report: Verité	2015	This report documents cases of forced labor on board Thai vessels supplying to fishmeal facilities in Thailand.	Verité report commissioned by Nestlé, based on field research in selected ports and facilities in Thailand. Thoroughly researched report with the methodology described in the report.

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The Thai fishmeal fishery is assessed as critical risk based on the above-listed evidence. The following is included for information.

INTERPOL has issued a Purple Notice on [Human trafficking and modern slavery in the fisheries sector in Southeast Asia and the Pacific Islands](#). “INTERPOL Notices are international requests for cooperation or alerts allowing police in member countries to share critical crime-related information.” Purple Notices “seek or provide information on modus operandi, objects, devices and concealment methods used by criminals.” The notice states:

“The crimes of human trafficking and modern slavery in the fisheries sector are facilitated by a unique combination of economic, labour, trade, legislative, regulatory and enforcement conditions, occurring within the context of complex and lucrative global supply chains. This Purple Notice describes some of the structures and methods used by criminal networks to enable, protect and prolong their activities within this environment, and makes recommendations to assist law enforcement agencies to identify and disrupt these activities. While this notice focuses on Southeast Asia and the Pacific Islands, it is likely (but unconfirmed) that the modus operandi described here also occurs in other parts of the world.”

Is there credible evidence of forced labor, human trafficking, or hazardous child labor in the fishing industry of the country? YES

Source URL	Source type	Year published	Summary of findings	Any remarks on the credibility of this source?
Guardian (2014)	Media: The Guardian	2014	The Guardian’s “Modern-day slavery in focus” series, which includes multiple articles documenting slavery on board Thai fishing vessels (some of which are also cited separately in this profile).	
AP (2015)	Media: Associated Press (AP)	2015	One of multiple, extensive articles by the AP, based on substantial investigative journalism. Very thorough documentation of slavery/forced labor/human trafficking on board Thai vessels docking in Indonesia.	Part of an award-winning investigative journalism series.
HRW (2018)	NGO report:	2018	“Hidden Chains Rights Abuses and Forced Labor in Thailand’s Fishing	HRW interviewed 246

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Source URL	Source type	Year published	Summary of findings	Any remarks on the credibility of this source?
	Human Rights Watch (HRW)		Industry"" documents persistent abuse and exploitation in Thailand's fishing industry, including pervasive forced labor and human trafficking, despite reforms.	fishermen between 2016 and 2018, including 95 individuals who were identified by Thai authorities as victims of forced labor for the report.
IJM and II (2017)	NGO report: International Justice Mission and Issara Institute	2017	<p>"Not In The Same Boat: Prevalence and Patterns of Labour Abuse across Thailand's Diverse Fishing Industry." This study documents the experiences of Burmese and Cambodian fishermen living in Thailand and finds extensive exploitation, including overwork and underpay. In addition:</p> <ul style="list-style-type: none"> • "18.1% of fishermen interviewed reported experiencing physical violence while working on the fishing vessels; this abuse was three times more likely to occur on boats that transshipped catch at sea; further, 100% of fishermen on boats that transshipped crew suffered physical abuse; • 76% of fishermen interviewed had been indebt bondage; • 37.9% of fishermen interviewed were clearly trafficked, while an additional 49.2% were possibly trafficked; 12.9% of the sample reported fair labour conditions at sea and experiencing no exploitative recruitment;" 	The research team interviewed 260 fishermen to find out if they have been trafficked, abused or witness to abuse, or experienced debt bondage by employers, brokers, or supervisors.
ILO (2017)	International organization: International Labour	2017	In 2016, the International Transport Workers' Federation (ITF) complained to the ILO's supervisory mechanism that the Thai Government's efforts to protect fishermen from forced labor and trafficking are insufficient and that forced labor and human trafficking	Official report of the Committee of Experts on Application of Standards.

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Source URL	Source type	Year published	Summary of findings	Any remarks on the credibility of this source?
	Organization (ILO)		is still rampant. In March 2017, the ILO's Committee of Experts concluded that the Government has taken important steps, but that more action is required to fully protect fishermen, acknowledging that forced labor and trafficking still occurs on Thai fishing vessels.	
ILO (2013)	International organization: ILO	2013	In-depth research on working conditions among migrant fishermen in the Thai fishing fleet. This report documents abusive and exploitative conditions, including forced labor, on board Thai vessels in detail.	Rigorous research methodology described in the report.
2016 USDOL TVPRA	Government report: US Department of Labor (USDOL)	2016	The 2016 USDOL TVPRA list cites Thailand for forced labor in fish and forced labor and child labor in shrimp.	
DOS (2017)	Government report: US Department of State (USDOS)	2017	The 2017 USDOS Trafficking in Persons (TIP) Report cites Thailand for human trafficking in fishing as a significant concern.	
RTG (2015)	Government report: Government of Thailand	2015	A 2015 Government of Thailand report on counter-trafficking initiatives that documents the continued existence of human trafficking and forced labor in fishing and describes efforts to curb it.	
Greenpeace (2016)	NGO report: Greenpeace	2016	Thorough documentation of forced labor and human trafficking in the Thai long-distance fleet. targeting tuna and species used to produce	The report is based on systematic and rigorous

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Source URL	Source type	Year published	Summary of findings	Any remarks on the credibility of this source?
			Surimi documented. Also, the report maps supply chains and documents the link between “trash fish” and Thai fishmeal, though the report does not include specific cases from vessels targeting mixed species trash fish. The report does present evidence of continued widespread abuse in the fishing industry in general and also links the “trash fish” to fishing for high value species.	research.
UNODC (2017)	International Organization: UN Office on Drugs and Crime (UNODC)	2017	Report on trafficking in persons from Cambodia, Lao PDR, and Myanmar to Thailand with information on the nature of trafficking in persons within the fishery, fishery-related and seafood sector in Thailand (<i>e.g.</i> , estimates on number of victims, working conditions, salaries, and wage deductions).	UNODC’s Regional Office for Southeast Asia and the Pacific has a mandate to monitor implementation according to the Palermo Protocol, and the Thailand Institute of Justice produced this report as part of their project to improve evidence-based knowledge on trafficking in the region.

A substantial amount of evidence is available. The above is NOT an exhaustive list of sources.

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Is there credible evidence that forced labor, human trafficking, or hazardous child labor exists in a related fishery* OR in unspecified fisheries? YES

Source URL	Source type	Year published	Related fishery: Y/N Summary of findings Fishery name, if available	Any remarks on the credibility of this source?
Greenpeace (2016)	NGO report: Greenpeace	2016	Yes, high-value species, tuna, Surimi.	

Refer to the table above on evidence of human trafficking and forced labor in the Thai fishing industry.

* In related fisheries, species are commonly caught together, species occur together in space and time (species assemblages), and/or species are caught in the same area with similar gear.

Does the country meet the Seafood Slavery Risk Tool's country criteria? NO

Note: When a critical risk has been determined, adherence to the Seafood Slavery Risk Tool's country criteria is not factored in the fishery rating. The following is provided for information.

Criteria	Sources	Description
Is this country ranked Tier 1 or Tier 2 on the U.S. Department of State Trafficking in Persons report?	U.S. Department of State Trafficking in Persons Report (USDOS TIP Report)	Yes. Tier 2 (2018). (See pp. 414-418) In 2018, Thailand was upgraded from Tier 2 Watch List to Tier 2.
Has the country ratified the	United Nations (UN) Treaty	Yes.

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Criteria	Sources	Description
Palermo Protocol (on human trafficking)?	Collections: Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime	
Has the country ratified the International Labour Organization's (ILO) conventions on forced and child labor (ILO 29, 105, 138, 182)?	International Labour Organization's (ILO) NORMLEX Database	Yes.
Has the country ratified the Port State Measures Agreement?	FAO: Port State Measures Agreement	Yes.
The country is NOT cited with a yellow or red card for inaction on illegal, unreported, or unregulated fishing by the European Union (EU).	EU Rules to Combat Illegal Fishing (IUU)	No. Thailand was first cited with an EU yellow card in 2015.
Does the country have legislation that criminalizes forced labor, slavery, human	ILO NATLEX Database USDOS TIP Report	Yes. Thailand has significantly changed and improved its legislation and enforcement

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Criteria	Sources	Description
<p>trafficking; and protects children from hazardous child labor?</p>	<p>Trafficking in Persons Report 2015: The Royal Thai Government's Response</p> <p>ILO Asia-Pacific Working Paper Series: Insights into the Thai seafood sector</p> <p>Sixth Supplementary Report: Report of the Committee set up to examine the representation alleging non-observance by Thailand of the Forced Labour Convention, 1930 (No. 29)</p> <p>Observer Onboard Program in Thailand Under the National Policy for Marine Fisheries Management</p> <p>Turn the Tide: Human Rights Abuses and Illegal Fishing in Thailand's Overseas Fishing Industry</p>	<p>regimes since 2014. See the following sources for details:</p> <p>USDOS 2018 TIP Report</p> <p>ILO Asia-Pacific Working Paper Series: Insights into the Thai seafood sector (2016)</p> <p>ILO Committee of Experts (2017): Sixth Supplementary Report: Report of the Committee set up to examine the representation alleging non-observance by Thailand of the Forced Labour Convention, 1930 (No. 29)</p> <p>The December 2015 changes to Ministerial Regulation Number 10 (under the Employment Act) prohibits work on vessels below 18 years, determines rest periods, stipulates written contracts, requires reporting to Ministry of Labor by employers and other measures to protect fishermen and onboard observers. See the following sources for details:</p> <p>ILO Asia-Pacific Working Paper Series: Insights into the Thai seafood sector (2016)</p> <p>Deep Sea Fishery Technology Research and Development Institute, Department of Fisheries, Thailand (2016): Observer Onboard Program in Thailand Under the National Policy for Marine Fisheries Management</p> <p>However, there is some evidence that the legislation is still not sufficiently developed to fully protect fishermen. See, for example:</p>

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Criteria	Sources	Description
		<p>Greenpeace (2016): Turn the Tide: Human Rights Abuses and Illegal Fishing in Thailand's Overseas Fishing Industry</p> <p>ILO Committee of Experts (2017): Sixth Supplementary Report: Report of the Committee set up to examine the representation alleging non-observance by Thailand of the Forced Labour Convention, 1930 (No. 29)</p>
<p>If the country has not ratified any of the ILO conventions listed above, the Palermo Protocol, and/or the PSMA, has equivalent national legislation been enacted and put into force for all non-ratified instruments?*</p>	<p>ILO NORMLEX Database: Committee of Experts on the Application of Conventions and Recommendations (CEACR)</p> <p>USDOS TIP Report</p> <p>The Global Slavery Index 2018</p>	<p>Not applicable.</p>
<p>Is there credible evidence of effective enforcement of national legislation and obligations under international conventions?***</p>	<p>ILO NORMLEX Database: Committee of Experts on the Application of Conventions and Recommendations (CEACR)</p> <p>Direct Request (CEACR) - adopted 2017, published 107th ILC session (2018) Forced Labour Convention, 1930 (No. 29)</p>	<p>No. While Thailand has significantly changed and improved its legislation and enforcement regimes since 2014, there is substantial inter-governmental, nongovernmental, and media evidence that anti-trafficking laws and regulations enacted to protect fishermen are still not adequately enforced. In addition, corruption continues to impede improvement efforts and is still cited as a major concern in the USDOS 2018 Trafficking in Persons Report, even though Thailand's ranking from Tier 2 Watch List to Tier 2. (p. 415)</p> <p>The ILO Committee of Experts has published multiple Observations and Direct Requests that raise concerns and encourage the Thai Government to enhance enforcement relating to forced labor, human trafficking, and hazardous child labor.</p>

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Criteria	Sources	Description
	<p>Observation (CEACR) - adopted 2017, published 107th ILC session (2018) Minimum Age Convention, 1973 (No. 138)</p> <p>Observation (CEACR) - adopted 2017, published 107th ILC session (2018) Forced Labour Convention, 1930 (No. 29)</p> <p>UN Office of the High Commissioner</p> <p>Concluding Observations (2017) CCPR/C/THA/CO/2</p> <p>USDOS TIP Report</p> <p>The Global Slavery Index 2018</p> <p>Hidden Chains: Rights Abuses and Forced Labour in Thailand's Fishing Industry</p> <p>Not in the Same Boat: Prevalence &</p>	<p>See, for example:</p> <p>Direct Request (CEACR) - adopted 2017, published 107th ILC session (2018) Forced Labour Convention, 1930 (No. 29) – This Direct Request encourages the Thai Government to enhance the capacity of law enforcement to identify victims of human trafficking.</p> <p>Observation (CEACR) - adopted 2017, published 107th ILC session (2018) Minimum Age Convention, 1973 (No. 138) – This Observation requests the Thai Government to take stronger action to combat child labor. It states, “The Committee also requests the Government to provide information on the number and nature of violations detected and penalties applied in child labour cases, focused on detection in agricultural plantations, fisheries, restaurants, markets, construction sites, and other occupational sectors where large numbers of children are employed.”</p> <p>Observation (CEACR) - adopted 2017, published 107th ILC session (2018) Forced Labour Convention, 1930 (No. 29) – This Observation speaks directly on the issues of human rights abuses in Thai fisheries, corruption increasing labor inspections, and providing justice and assistance to victims.</p> <p>Go to http://www.ilo.org/dyn/normlex/en/f?p=1000:20010:::NO:: for additional documents relating to Thailand’s implementation of ILO Conventions 29, 105, 138, and 182.</p> <p>In April 2017, the Human Rights Committee observed in Concluding Observations (2017) CCPR/C/THA/CO/2</p>

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Criteria	Sources	Description
	<p>Patterns of Labour Abuse Across Thailand's Diverse Fishing Industry</p>	<p>Trafficking and forced labour</p> <p>23. While taking note of the significant efforts undertaken to address trafficking and forced labour, the Committee remains concerned that trafficking in persons and forced labour remain and give rise to significant problems, particularly regarding sexual exploitation, fishing, agriculture and domestic work. It is concerned about reports on child labour and the exploitation of vulnerable people, such as irregular migrants and indigenous peoples. It is further concerned about reports of victims of trafficking being deported without being effectively screened for an assessment of their protection needs, and about the premature collection of their testimonies in order to facilitate prompt deportation (arts. 7-8 and 24).</p> <p>According to the 2018 USDOP TIP Report, the government increased prosecution, prevention and protection efforts. However, “the government reported investigating significantly fewer cases of labor trafficking in the fishing industry in 2017; it investigated seven cases in 2017 (43 in 2016).” (p. 414) In addition, “corruption and official complicity in trafficking crimes continued to impede anti-trafficking efforts,” but “the government has increased efforts to address complicity.” (p. 415).</p> <p>The 2018 Global Slavery Index (GSI) includes a new Fisheries analysis, which concludes that Thailand’s fishing industry has a high risk for modern slavery.¹</p> <p>Like in 2016, the 2018 GSI rates the Government Response B, which indicates, “The</p>

¹ “Fishing” (The Global Slavery Index, 2018), <https://www.globalslaveryindex.org/2018/findings/importing-risk/fishing/>.

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Criteria	Sources	Description
		<p>government has introduced a response to modern slavery, with limited victim support services, a criminal justice framework that criminalises some forms of modern slavery (or has recently amended inadequate legislation and policies), a body or mechanisms that coordinate the response, and has policies that provide some protection for those vulnerable to modern slavery..." For the full explanation of this rating, see GSI: How Did We Measure Government Responses? A 2018 Human Rights Watch report, Hidden Chains: Rights Abuses and Forced Labour in Thailand's Fishing Industry, documents persistent abuse and exploitation and links it with inadequate enforcement of regulations:</p> <p>"This report documents forced labor and other human rights abuses in the Thai fishing sector. It identifies poor working conditions, recruitment processes, terms of employment, and industry practices that put already vulnerable migrant workers into abusive situations—and often keep them there. It assesses government efforts to address labor rights violations and other mistreatment of migrant fishers. It also highlights improvements and shortcomings in Thai law and the operational practice of frontline agencies that allow victims of forced labor to fall through gaps in existing prevention and protection frameworks.</p> <p>...These reforms have focused primarily on establishing control over fishing operations and tackling IUU fishing. Yet they have had little effect on human rights abuses that workers face at the hands of ship owners, senior crew, brokers, and police officers. Meanwhile, the impact of stronger regulatory controls on improving conditions of work at sea has been limited as a result of poor implementation and enforcement.</p> <p>In some respects, the situation has gotten worse. For instance, the</p>

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Criteria	Sources	Description
		<p>government’s ‘pink card’ registration scheme, introduced in 2014 in an effort to reduce the number of undocumented migrants working in Thailand, has tied fishers’ legal status to specific locations and employers whose permission they need to change jobs, creating an environment ripe for abuse. The pink card scheme, as well as practices where migrant workers are not informed about or provided copies of required employment contracts, has become means through which unscrupulous actors conceal coercion and deception behind a veneer of compliance. In this way, routine rights abuses go unchecked as officials are content to rely on paper records submitted by fishing companies and the government employs labor inspection frameworks that fail to closely examine actual labor practices at sea.”</p> <p>A 2017 International Justice Mission study, Not in the Same Boat: Prevalence & Patterns of Labour Abuse Across Thailand’s Diverse Fishing Industry, also documents that enforcement of legislation is still challenging and overwork, underpayment, debt bonding, violence, etc. are still common experiences among migrant fishermen on Thai vessels.</p> <p>Thailand’s first conviction of a business owner for forced labor in fishing was handed down in 2017.²</p>

² Ryn Jirenuwat and Russell Golfman. “Dozens Found Guilty in Thailand in Human-Trafficking Case.” The New York Times, July 19, 2017, sec. Asia Pacific. <https://www.nytimes.com/2017/07/19/world/asia/thailand-human-trafficking-case.html?mcubz=0%20and%20see%20the%202017%20TIP%20report%20for%20evidence%20of%20first%20conviction%20for%20forced%20labour%20in%20fish%20ing>.

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* It may be acceptable where a State has not ratified any of the convention(s) listed above, that a State has passed and brought into effect wholly and fully legislation and relevant accompanying regulation, where needed to implement legislation, that is at least materially identical in substance, intent, effect and spirit to the provisions of the relevant convention(s). It is expected that relevant legislation and regulation will include provisions that are suitably onerous and comprehensive in nature and intent to provide for its full and proper enforcement. Where this is the case, the country may be assessed as fulfilling the country criteria, despite the non-ratification(s).

** The assessment of a country's enforcement relies primarily on comments by the Committee of Experts on the Application of Conventions and Recommendations, which supervise the application of ILO conventions, and the U.S. Department of State's Trafficking in Persons Report. Both sources are credible, global in scope, and publicly available. Additional, credible sources may also be used. This assessment does not constitute a full and complete analysis of law enforcement in any country.

Is there credible evidence of forced labor, human trafficking, or hazardous child labor in seafood processing, agriculture, forestry, or aquaculture in the country?* N/A

Source URL	Source type	Year published	Sector / Industry	Summary of findings	Any remarks on the credibility of this source?
Not applicable when the profile fishery is rated critical risk.					

* Evidence of forced labor, human trafficking, or hazardous child labor in a country's seafood processing, forestry, agriculture, and aquaculture industries may be examined as *indicators* of risk for the at sea portion of a fishery. See the Seafood Slavery Risk Tool's conceptual model to view which pathways trigger an examination of related or similar renewable resource industries.


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Summary of Risk Rating

The Thai fishmeal fishery is rated CRITICAL RISK based on multiple sources documenting a direct link between the use of forced labor on board Thai-flagged vessels off-loading “trash fish” in Thai ports that is then used in the production of fishmeal (for feed) at Thai fishmeal facilities. There is also substantial evidence that forced labor and human trafficking are pervasive on a systemic scale in the Thai fishing industry. Forced labor and human trafficking are associated, in particular, with long-distance, deep-sea vessels, often using transshipment. Some of these vessels have been documented to fish for “trash fish” (mixed species) for fishmeal production in Thailand. Other evidence relates to higher value species or “fishing” in general. When a critical risk has been established, adherence to the **Seafood Slavery Risk Tool’s country criteria and other mitigating** circumstances are not factored in the fishery rating. However, it is important to note that more recent evidence from 2017-18 shows that the risk of forced labor and human trafficking remains high in Thailand’s fisheries even though the government is making significant progress to combat human rights abuse in the industry. Nevertheless, enforcement of regulations still **presents a major challenge as evidenced in the European Union’s (EU) renewal of a yellow card for inaction on illegal fishing**. Thailand was first cited with an EU yellow card in 2015. While the U.S. Department of State’s 2018 Trafficking in Persons report upgrades Thailand’s rating from Tier 2 Watch List to Tier 2 in recognition of the Government’s substantial efforts, it also states that significant challenges remain in the fishing industry. In addition, the 2018 Global Slavery Index’s new Fisheries analysis rates Thailand’s fishing industry as having a high risk of modern slavery. The Risk Tool team will continue to monitor reform and enforcement efforts in Thailand and encourages Risk Tool users to evaluate current information when conducting their due diligence.

Conceptual Model Path

Critical Risk	There is credible evidence of human rights abuses in the profile fishery	 <pre> graph TD A[Slavery in fishery?] --> B((Y)) B --> C[CRITICAL] </pre>
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