Ethical Trading Initiative

Shrimp Supply Chains

Making the link between purchasing practices & human rights

Contents

Introduction

This report examines working conditions, including non-compliance with the Ethical Trade Initiative (ETI) Base Code, across global shrimp supply chains. Violations of workers' fundamental rights[1] are not confined to one tier of the supply chain (e.g. fishing) or to one sourcing location (e.g. Thailand). As such, this report examines how the purchasing practices of buyers in the USA, the UK, the 27 member states of the European Union (EU 27) and Australia influence labour standards along the shrimp supply chain.

This report draws on academic research on purchasing practices, an analysis of trade data, and a desk review of reports on working conditions by UN agencies and nongovernmental organisations. It explores the connection between purchasing practices that squeeze suppliers (or that limit their ability to adequately plan production volumes) and poor labour standards along the supply chain.

The report is not an assessment of an individual company's supply chain or purchasing practices. Rather, it seeks to provide an overview of the shrimp industry as a whole. There is limited data available on specific purchasing practices in the seafood industry, including order forecasting, payment terms and contract terms. Therefore, this report draws on research from both the shrimp industry and other food sectors to highlight how more responsible purchasing practices can mitigate human rights risks and support labour rights along the supply chain.

Executive summary

Shrimp supply chains face documented human rights risks across all tiers, including hatcheries, shrimp farms, feed mills, processing facilities and distribution networks. Violations include forced labour, informal employment relations, low wages, unsafe working conditions, limited freedom of association, restricted worker voice and discrimination. Buyers' commercial decisions and purchasing practices are key drivers of these risks, yet they are rarely addressed. Traditional supply chain governance mechanisms – such as audits, traceability and certifications – do not look at these decisions and practices, meaning these tools are insufficient to prevent violations. Responsible purchasing practices (RPP) provide the missing link, helping buyers to shape pricing, order planning, contract terms and payment schedules in ways that reduce pressure on suppliers and support labour rights.

This report explores the connection between buyers' purchasing practices and human rights along the shrimp supply chain. It draws on a desk review of reports on working conditions by UN agencies and nongovernmental organisations, academic research on purchasing practices, and an analysis of trade data to demonstrate that human rights risks are found at all tiers of the shrimp supply chain (see Figure 1).

Figure 1: Summary of risks of non-compliance with the ETI Base Code along the shrimp supply chain

'Governance tools — including audits, certifications, grievance mechanisms, and human rights impact assessments — have limitations in addressing labour risks. Even downstream, their methodology and implementation may not provide full or realistic visibility into working conditions. Within the scope of this report, the focus is on one specific limitation: these tools do not adequately capture the upstream pressures created by buyers' purchasing practices, such as pricing, lead times, order volumes, and contractual terms, which shape working conditions. To ensure respect for human rights, addressing these risks requires extending risk management beyond supplier-level monitoring to include the influence of buyers' business decisions along the supply chain.'

Impact of purchasing practices on human rights risks

The evidence shows that the compounded impacts of individual aspects of purchasing practices amplify financial pressure on suppliers and systematically shifting risk onto workers, particularly those in informal, temporary or piece-rate employment.

Downward price pressure

Over the past decade, the price of shrimp (both frozen and value-added, processed shrimp) has fallen. At the same time, the volume of shrimp sourced from the lowest-price producer countries – Ecuador and India – has soared. Research has shown that downward price pressure impacts labour rights, particularly when employment conditions – such as piece-rate wages and informal work with no set hours – are designed to push the risk of fluctuating market prices onto workers. For example, in Vietnam, research found that 97% of interviewed workers were paid based on yield and market prices, rather than being paid a pre-agreed wage. Contracts between buyers and suppliers may include clauses related to remaining price competitive or enabling buyers to break the contract and source elsewhere if they find a cheaper supplier. Such clauses embed a culture of low-cost production over respect for human rights or environmental protection, with implications for workers along the supply chain.

Sourcing below the cost of production

While the average export price of shrimp has decreased, production costs have not, leading to shrimp being sourced for less than it costs to produce. Sourcing below the cost of production inevitably drives shrimp producers to undertake cost-saving measures to reduce their losses, with labour costs most likely to be squeezed. Research in India, Indonesia and Vietnam found that this had resulted in work days of 9–14 hours and reductions in workers' earnings of 20–60% compared to before the pandemic.

Failure to account for increases in the minimum wage

When buyers threaten to relocate – or actually relocate – when prices increase, it undermines suppliers' ability to incorporate increases in the minimum wage into product pricing. In 2024, the minimum wages in Ecuador, India and Vietnam increased, yet the average export prices of frozen shrimp from Ecuador and India were lower than the average prices in 2023, while the price of Vietnamese shrimp remained unchanged.

Poor forecasting & planning

Poor forecasting and order planning can create uncertainty for suppliers, particularly as shrimp farming is highly sensitive to environmental conditions, cultivation takes three to six months, and crops naturally vary in size. Fluctuating demand and availability of raw materials can directly impact working conditions. When there is too much shrimp available to process, factories and peeling sheds may resort to hiring additional temporary workers or may outsource shrimp peeling to home-based workers. Both have fewer labour rights and no employment security. When demand is too low, informally employed primary processing workers have no work and therefore no income, further exacerbating financial and labour insecurity.

Hyper-flexibility & last-minute changes to orders

Across India, Indonesia, Thailand and Vietnam, intermediaries enable processors to procure the required volume of shrimp to fulfil buyers' orders. However, farmers receive lower prices than when they sell directly to processing factories. This directly impacts workers' earnings, particularly when their income is linked to the market price rather than them receiving a pre-agreed wage. When buyers require hyper-flexibility, including last-minute changes to order volume, it can therefore directly impact the earning potential of shrimp producers and farm workers in the lower tiers.

Delayed payments & long payment terms

Long payment schedules require suppliers to finance production, including by purchasing shrimp and paying workers' wages, prior to being paid by retailers. When retailers and buyers have unfavourable payment terms or apply financial penalties to orders, this can put financial stress on suppliers, particularly when combined with poor forecasting and planning. This financial stress can create highly pressured work environments that undermine occupational safety and health, contribute to harassment from supervisors to meet high production targets, and lead to long hours and unpaid overtime.

Uneven distribution of risk

When shrimp crops fail or farm gate prices crash, shrimp farmers can be pushed into debt they struggle to repay. In contrast, the profits of the companies producing the farm inputs (e.g. shrimp feed) remain more stable, concentrating the risks involved in shrimp farming with shrimp farmers. In Ecuador, India, Indonesia, Thailand and Vietnam, power is concentrated in large, vertically integrated corporations that dominate the feed and processing tiers of the shrimp supply chain. The millions of shrimp farmers and thousands of small-scale primary processing operations have limited power to negotiate when price squeezes are cascaded along the supply chain. Similarly, they have few options when retailers demand large volumes of a single size of shrimp from a naturally size-distributed shrimp harvest.

Failure to incorporate the cost of compliance

Social auditing, certification, sustainability initiatives and compliance with a buyer's code of conduct can entail additional costs for producers. While large, vertically integrated corporations can absorb these costs, they can severely challenge small operations and pose a barrier to market entry for small-scale shrimp farmers. If buyers do not account for these costs in pricing or provide market incentives, compliance may be undermined, reducing accountability for labour standards.

Recommendations for shrimp buyers: the Common Framework for Responsible Purchasing Practices in Food

To address these risks, buyers and retailers should move beyond supply chain governance alone and embed RPP into their commercial decision-making as part of their human rights due diligence under the UNGPs and Organisation for Economic Co-operation and Development's Due Diligence Guidance for Responsible Business Conduct. To this end, the below recommendations are structured according to ETI's Common Framework for Responsible Purchasing Practices in Food.

PRINCIPLE 1:
Internal integration

In order to implement changes to purchasing practices, the company has top leadership buy-in and commitment, along with a thorough understanding of existing suppliers and purchasing systems, and their (possible) negative impact on human rights. It uses this information to decide on priorities that feed into an agreed improvement plan. RPP are integrated into the commercial and other relevant departments of the business.

Recommendations for buyers

- Periodically conduct human rights impact assessments (HRIAs) documenting human rights impacts, including those from purchasing practices, and establish timebound corrective action plans with technical and financial support. This should include ensuring HRIA findings are actively addressed; without implementation, the HRIA is ineffective.
- Establish mechanisms for supply chain stakeholders to provide feedback on both human rights and purchasing practices, ensuring that corrective actions are responsive and sustained over time.
- Provide technical and financial support to suppliers who wish to improve their compliance and progressively work towards paying the living wage, in line with the ETI Base Code.
- Demonstrate loyalty to suppliers that invest in improving working conditions.
- Work with shrimp exporters and processors to more equitably distribute risk along the shrimp supply chain, including by introducing accountability mechanisms for cascading sustainable pricing and commitments to living wages down to small-scale processing operations and shrimp farms.

PRINCIPLE 2:
Equal partnership

The purchasing company and their suppliers respect each other as equal business partners, engage in respectful sourcing dialogue, and pursue win-win situations, with a shared responsibility for improving working conditions.

Recommendations for buyers

- Invest in building long-term, equal partnerships with suppliers that allow for stable sourcing relationships and sufficient time to plan the production process.
- Engage in good-faith contract negotiations with suppliers, ensuring that contractual terms and product pricing do not undermine suppliers' ability to comply with national labour laws, international labour standards or the buyer's code of conduct.

PRINCIPLE 3:
Collaborative production planning

Production planning is done collaboratively between the purchasing company and suppliers. Any changes are mutually agreed and cannot be detrimental to the supplier.

Recommendations for buyers

- Engage in collaborative production planning with suppliers. Provide accurate forecasts of order specifications, frequency, volume, delivery dates and certification requirements, while recognising that shrimp naturally vary in size.
- Engage in regular, ongoing dialogue with suppliers regarding the labour minute costing involved in fulfilling an order – based on reasonable productivity targets that allow for sufficient breaks and fair remuneration in line with national labour laws – and plan lead times accordingly.
- Adopt a partnership approach to communication and problem solving, communicating any changes in orders in a timely manner, with sufficient lead times to deliver on the changes. Ensure that any cost implications arising from changes to an order after a price has been agreed are reimbursed.

PRINCIPLE 4:
Fair payment terms

The purchasing company and suppliers agree on fair and transparent payment terms that include all relevant information regarding the payment procedure and do not place a disproportionate burden on one party. Contractual obligations are honoured at all times. Payments are made in full and on time.

Recommendations for buyers

- Seek to agree on fair and transparent payment terms that enable suppliers to pay workers in a timely manner (e.g. capping payment terms at 30 days from FOB shipment date).
- Make payments on time, based on contractually agreed timelines, and in full with no retrospective or unilateral changes to mutually agreed prices.
- Compensate compliance with buyer-stipulated sustainability requirements through market rewards such as higher order volumes or increased prices.

PRINCIPLE 5:
Sustainable costing

The costing procedures and levels of the purchasing company reflect and support wage increases and sustainable production. Prices cover all costs of production in line with responsible business conduct and allow for a reasonable and maintained supplier profit margin.

Recommendations for buyers

- Commit to ensuring that the price paid for shrimp covers the cost of production, including (at an absolute minimum) paying the legal minimum wage and social security benefits along the supply chain. Stipulate this commitment, along with a set timeframe for periodic reviews of production costs, in buyer–supplier contracts.
- Ensure sustainable costing allows for reasonable and maintainable profit margins for suppliers, to reduce the risk that profit margins will be maintained by violating workers' rights.
- Develop mechanisms to ensure that rising production costs, particularly increases in the minimum wage or in wage rates covered by collective bargaining agreements, are incorporated into product pricing.
- In line with the ETI Base Code, ensure pricing structures progressively allow for increases in wages towards a living wage along the supply chain.
- Understand climate-related risks and support a just transition by proactively working with suppliers to adapt to and mitigate climate impacts, ensuring that the costs of adaptation and transition are not borne disproportionately by workers, farmers or small-scale producers.

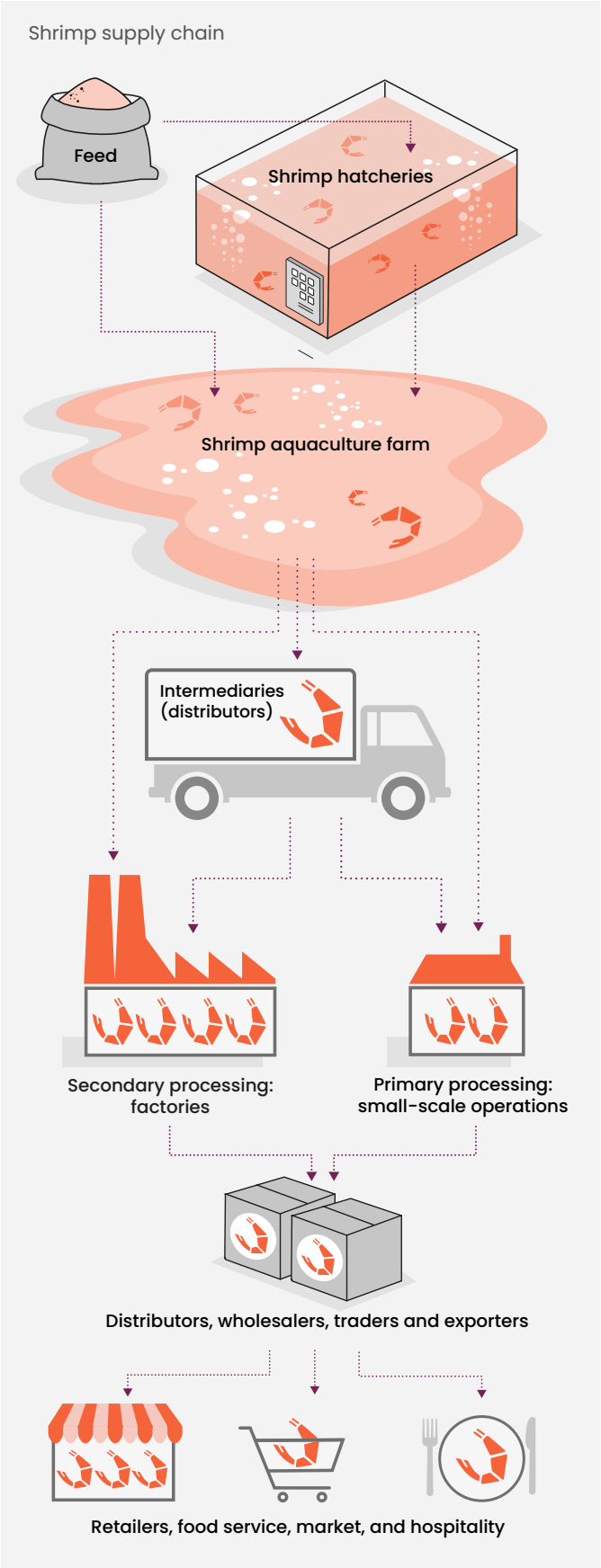
Conclusion

This report shows that purchasing practices are a central factor shaping labour conditions across shrimp supply chains. Downward price pressure, below-cost sourcing, short-term contracts, poor forecasting and delayed payments compound risks for workers, particularly those in informal and temporary employment. To ensure respect for human rights, retailers and food companies must recognise that these commercial practices directly influence suppliers' ability to uphold labour standards.

Ignoring these risks carries growing legal, financial and reputational consequences, particularly under frameworks such as the EU Corporate Sustainability Due Diligence Directive (CSDDD) and the EU Forced Labour Regulation, which heighten expectations on buyers to identify and address adverse impacts linked to their business decisions. While individual companies often struggle to act alone, collective approaches are essential to overcome competitive pressures and misaligned incentives.

ETI's RPP in Shrimp Supply Chains initiative provides a structured way for retailers and food companies to align commercial and sustainability objectives, engage collaboratively with suppliers, and support more sustainable, rights-respecting shrimp supply chains. As regulatory, investor and civil society scrutiny intensifies, companies that engage with RPP now will be better positioned to shape practical solutions, improve conditions for workers and maintain access to key markets. ETI invites all retailers and food companies to join the project and proactively influence how the shrimp supply chain evolves, implementing practices that are practical, responsible and verifiable.'

Overview of the shrimp supply chain and human rights risks



Human rights violations, including violations of the ETI Base Code,[2] have been documented across multiple sourcing locations and tiers of the shrimp supply chain. This section offers an introduction to some of the issues, demonstrating that they are not confined to one tier of the supply chain nor to one producing country.

Shrimp hatcheries

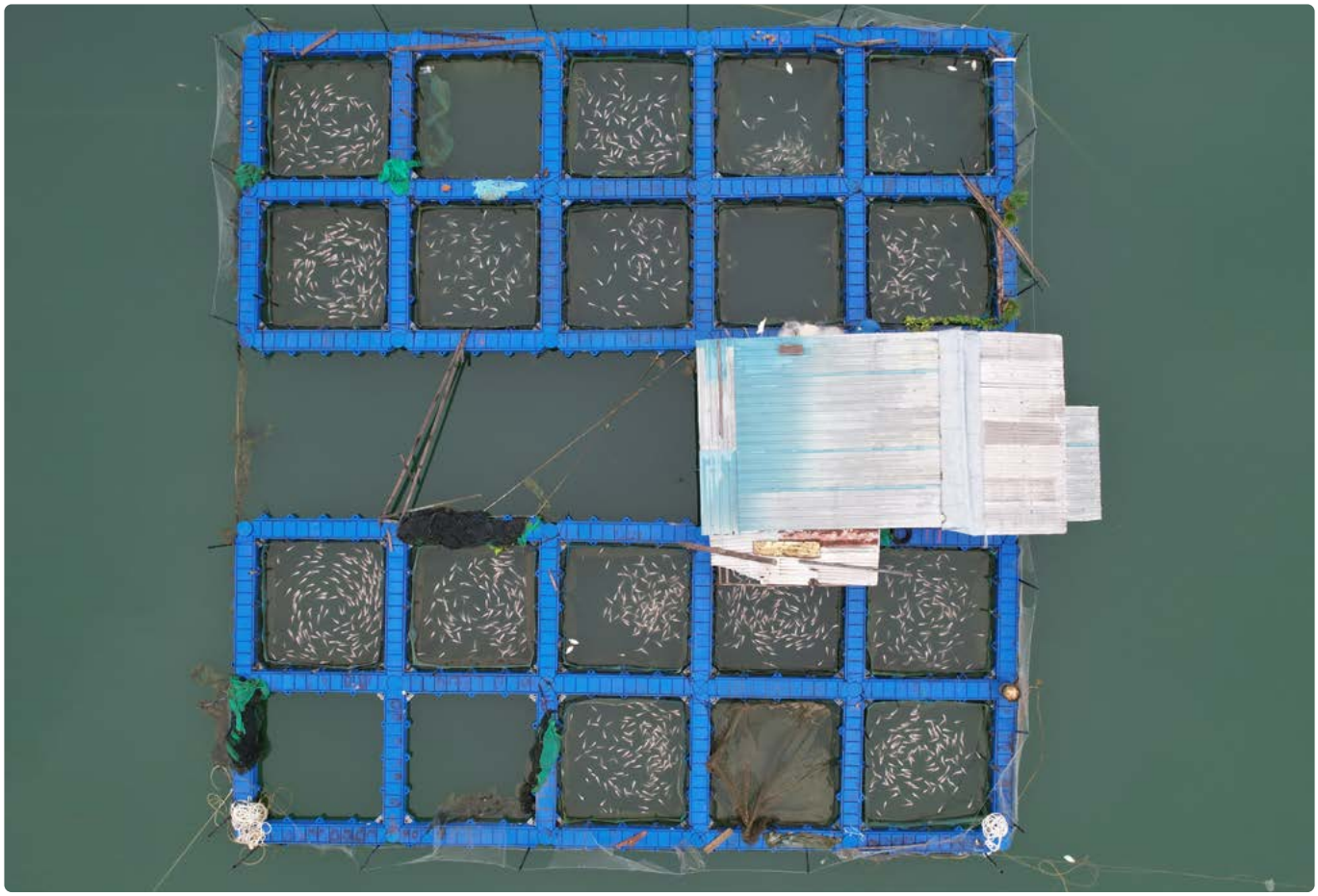
Hatcheries play a key role in producing healthy shrimp larvae for successful shrimp farm crops. To produce shrimp seed, hatcheries select healthy broodstock and carefully manage the environmental conditions of the water, including pH, salinity, oxygen and temperature.[3] Today, large, vertically integrated corporations play a key role in the production of shrimp larvae.

Much of the limited evidence on working conditions in shrimp hatcheries was published in 2024. In Indonesia, researchers found that the role of large corporations in the production of shrimp fry led to more formal employment than in other segments of the supply chain.[4] In Vietnam, research found that hatcheries offered the best working conditions along the shrimp supply chain, yet starting wages were reportedly below minimum wage.[5] In India, however, researchers found that hatchery workers lived in dormitories onsite, were always on call (as hatcheries require round-the-clock monitoring) and earned less than minimum wage.[6] Hatchery waste water was also found to be causing health problems for the local community.[7]

Shrimp aquaculture farms

In Asia, shrimp is primarily farmed on small-scale aquaculture farms. There are an estimated 1.8 million shrimp farmers in Asia, with their farms averaging one hectare in size[8]. Large-scale aquaculture farms are more common in Ecuador, where approximately 3,000 shrimp farms cultivate 250,000 hectares.[9] In high-density, intensive shrimp farms, shrimp ponds are stocked with shrimp seed, while low-density, extensive farms rely on wild shrimp. Shrimp ponds are often stocked between 04:00 and 07:00.[10] Once the ponds are stocked, farm workers feed the shrimp four times per day.[11] Like hatcheries, intensive shrimp ponds require 24-hour monitoring of pond aeration.

Working arrangements are often informal and working hours can be long, with farm workers in India reporting work days of 8–12 hours or more.[12] Workers also generally have low earnings. In Vietnam, shrimp farm workers earn based on yield and market prices, often lacking formal contracts or social security contributions.[13] A study in Indonesia found that shrimp farmers and farm operators (workers) split the profits of the shrimp crop 80:20.[14] Several studies conducted in India found that workers lived onsite, often in huts that lacked adequate sanitation facilities, and remained constantly on call to monitor the ponds.[15] A human rights impact assessment (HRIA) conducted by Impactt in 2022 noted that, in Vietnam, shrimp farm workers similarly lived on the farm. They had to apply for permission to leave the farm when they were not working and during their monthly day off.[16]



Occupational safety and health on shrimp farms remains a significant concern, despite this being a fundamental right at work. Drawing on interviews with 240 shrimp farm workers in India, research found that 55% of the workers had experienced back pain, 51% had fallen or slipped, 51% had been cut, 51% had experienced a skin infection, 44% had experienced an electric shock, 38% had experienced breathing problems and 27% had experienced a fracture.[17] Research has also documented the negative impacts of environmental pollution from shrimp farms on the human rights and livelihoods of local communities.[18]

There is limited evidence regarding working conditions on shrimp farms in Ecuador. However, the Global Rights Index 2025 ranked Bangladesh and Ecuador in the 10 worst countries in the world for workers. It noted that only 1% of workers in Ecuador have access to collective bargaining, largely due to intimidation and restrictive legislation that requires excessively high minimum thresholds. It also observed that workers who attempt to organise face threats, dismissal and even death threats.[19] The Monterey Bay Aquarium notes the lack of evidence specifically on working conditions on Ecuadorian shrimp farms. Nevertheless, it reports that the lucrative nature of the shrimp industry has made it the target of organised crime, as a result of which workers have experienced extortion, threats, theft, assault and murder.[20] It documents that this has led some farmers in remote areas to confiscate workers' phones as a security measure, resulting in increased isolation (an ILO indicator of forced labour).[21]

Shrimp farmers have to contend with high input costs regardless of the farm gate price for shrimp or the success of their crop. Ongoing input costs include shrimp seed, shrimp feed, medication, fuel and labour. The input market, which includes the production of shrimp feed and hatcheries supplying shrimp seed, is highly consolidated in comparison to the large number of shrimp farms. In India, for example, there are an estimated 120,000 shrimp aquaculture farmers, 330 shrimp hatcheries and 38 feed mills.[22] This concentrates power and influence over production costs with the companies dominating the input market.

SPOTLIGHT: shrimp feed production

In addition to shrimp fry, the other major input in semi-intensive and intensive shrimp farming is shrimp feed. Shrimp feed accounts for approximately 40–60% of the cost of production on intensive shrimp farms and therefore greatly influences shrimp farmers' production costs.[23] In 2024 the aquaculture feed market was worth an estimated US$4.3 bn, and it is expected to continue to grow.[24]

Shrimp feed ingredients include fish meal, fish oils, soy and wheat, along with other processed animal proteins. Fish meal constitutes approximately 27.5% of feed for vannamei shrimp, with the IFFO – The Marine Ingredients Organisation estimating that the production of 1kg of crustaceans requires 0.46kg of wild-caught fish.[25]

In 2014, the media shone a spotlight on shrimp feed supply chains. Specifically, it made the link with forced labour on Thai fishing vessels and the 'trash fish' ground into fish meal for use in aquaculture feed. It called attention to the poor working conditions under which the fish were caught.[26] Currently, Peru is by far the biggest producer of fish meal, making up 27.5% of global fish meal exports in 2024.[27] A report published by the US Department of Labor in September 2024 found indicators of forced labour in Peruvian fisheries, including very low or no pay, threats, and abuse of vulnerability.[28]

Studies on working conditions in fish meal mills have been more limited. Research published by the Sustainability Incubator in 2024 nevertheless noted that in Vietnam, fish meal plant workers reported earning lower wages than before the pandemic for the same volume of work.[29]

Retailers may feel that the ingredients used to manufacture shrimp feed are beyond the purview of their shrimp procurement decisions. However, the highly consolidated nature of the shrimp feed industry means that a small number of key corporations exert significant control over the shrimp feed market. The aquaculture feed market is dominated by ADM, BioMar, Cargill, CP Foods, Grobest, Guangdong Evergreen, Guangdong Haid, Skretting (Nutreco), Thai Union and Tongwei.[30] Many of these companies are vertically integrated and also own shrimp hatcheries. Some additionally own processing facilities that export shrimp.

These large corporations thus hold sufficient power to influence both shrimp producers' costs of production and labour standards along the shrimp feed supply chain. Moreover, the vertical integration of the shrimp supply chain means that retailers may already have commercial relationships with the key market actors.

Intermediaries (distributors)

Shrimp farmers sell their harvest either directly to processing businesses or via intermediaries (distributors). These intermediaries can play a role in harvesting shrimp from ponds, sorting and grading shrimp by size, or simply aggregating supply to meet the procurement needs of shrimp processors. The intermediaries then take a cut of the value when selling the shrimp on to shrimp processing companies.

Research from multiple countries has found that intermediaries can offer advances to shrimp farmers to cover some of their input costs. In return, the intermediary gets first call on the sale of the shrimp produced on the farm. Intermediaries can manipulate this relationship of debt and obligation to drive prices down below the farm gate price.[31]

Primary processing: small-scale operations

Primary processing includes shrimp peeling, deveining and freezing. It can be undertaken in small primary processing operations, sometimes referred to as 'peeling sheds'. These are often informal sites with fewer workers and health and safety measures than formal factories. Although they are significantly more numerous than factories, due to their size they typically have low levels of bargaining power. Research has also found home-based workers involved in the primary processing of shrimp in Indonesia and Thailand, often when small operations have an oversupply.[32] As home-based workers sell to small operators or intermediaries, it is unclear whether they sell into global supply chains.

Peeling and deveining shrimp is a labour-intensive process. Yet in many shrimp producing countries primary processing is characterised by informal work, which often excludes workers from legal protection under national labour laws. Informally employed workers lack written contracts, a guaranteed minimum wage, access to paid leave and social security protections. Multiple studies have shown that primary processing workers in India, Indonesia, Thailand and Vietnam typically earn piece-rate wages, where their earning potential is linked to the speed at which they work and the volume of work available. This frequently results in them receiving payments below the minimum wage and working long hours.[33] Research has also shown how primary processing workers are required to pay for their own personal protective gear and face occupational safety and health hazards from using knives to behead, devein, and peel cold, wet shrimp.[34]

Secondary processing: factories

Some factories peel, devein and behead shrimp inhouse and some outsource it to small-scale operations, as described above. Formal factories typically have controlled environments with strict food health and safety protocols. These factories prepare frozen shrimp for export and retail. Depending on the factory and source location, they may also carry out value-adding activities such as marinating, cooking or preserving shrimp.

When it comes to the shrimp supply chain, research has shown that export-oriented seafood-processing factories are the most likely tier to offer formal employment with written contracts and pre-agreed wages.[35] In order to earn minimum wage, however, workers must often meet high production targets. Based on interviews with shrimp processing workers in Indonesia and Thailand in 2017, Oxfam and Sustainable Seafood Alliance Indonesia reported that high production targets result in significant workplace pressure, limiting workers' ability to take bathroom breaks.[36] The Sustainability Incubator reports that these production targets have increased since the Covid-19 pandemic.[37] Cold temperatures involved in shrimp processing can lead to occupational accidents, with workers in India and Thailand reporting cuts and frostbitten fingers.[38]

In India, research and investigative journalism have documented how shrimp processing workers live onsite in company dormitories. Their movements are monitored by security guards and they need permission to leave, meaning that their freedom of movement is restricted.[39] A HRIA of the Indian shrimp supply chain conducted by ELEVATE found that workers living in company dormitories typically work 12-hour days and that some reported feeling unsafe in the dormitories due to physical and sexual violence.[40] In Thailand, where workers in seafood-processing factories are predominantly migrant workers from Cambodia or Myanmar, discrimination and restrictions on the right to organise remain ongoing issues.[41]

Distributors, wholesalers, traders & exporters

Distributors buy from processing factories and sell to retailers. Distributors are often large corporations and can exert influence over shrimp prices due to their size and position within the supply chain. In Ecuador, for example, five export companies are responsible for 43% of shrimp exports.[42] Some large, vertically integrated seafood companies are also involved in distribution.

Violations of the ETI Base Code

Violations of the ETI Base Code, including severe forms of labour abuse, can be found along the shrimp supply chain. These violations are summarised in Figure 1.

Figure 1: Summary of risks of non-compliance with the ETI Base Code along the shrimp supply chain

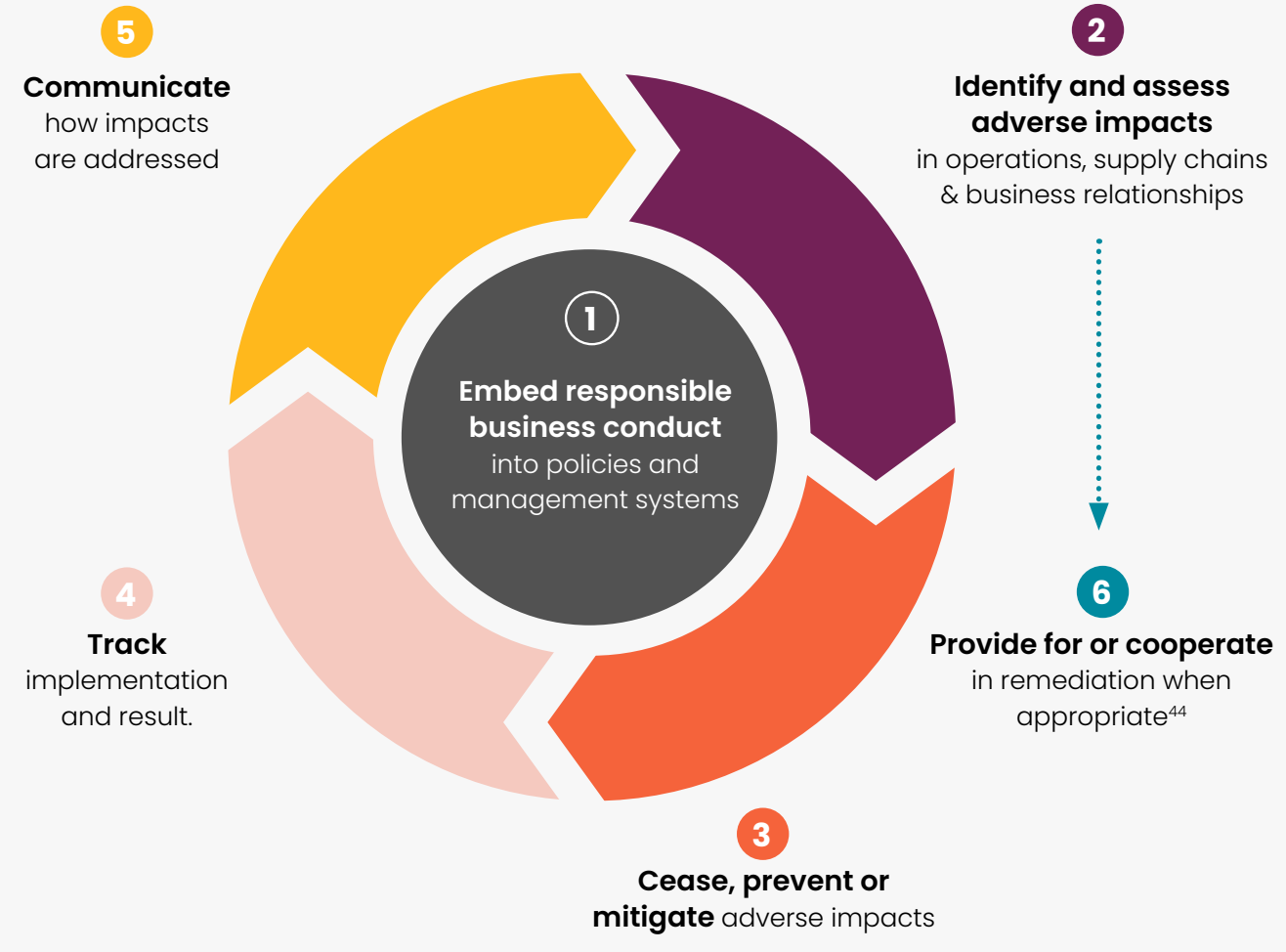
Supply chain governance

The UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct established the expectation that the private sector would play a role in respecting human rights.[43] Supply chain governance is central to embedding social and environmental considerations into business operations, managing risks, and cascading respect for human rights along the shrimp supply chain. This section summarises the key supply chain governance mechanisms buyers and retailers may adopt to meet their obligations to respect human rights, in line with international guidelines. It should be noted that while some companies do use some or all of these governance mechanisms, many do not yet do so.

Human rights & environmental due diligence

Human rights and environmental due diligence is essential for identifying potential risks in the various tiers of the shrimp supply chain. Supply chain due diligence involves assessing risks, identifying actual and potential negative impacts, putting in place a remediation plan, and monitoring the effective implementation of remediation.

The Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Business Conduct sets out a six-step process:



Supply chain policies

Public policies detail retailers' commitments to respecting human rights and their expectations and requirements of suppliers, as detailed in the ETI Base Code. Supply chain policies often include a supplier code of conduct, a human rights policy and (for companies in the shrimp industry) a responsible seafood sourcing policy.

Supplier visits & training suppliers

Embedding supply chain policies, such as a supplier code of conduct, entails training suppliers. This ensures suppliers are aware of the buyer's policies and how to implement them. Buyers' visits can promote continued dialogue with suppliers regarding social and environmental compliance and support inhouse monitoring of implementation. Research conducted in Canada, however, notes that efforts to embed human rights policies in seafood supply chains vary significantly between retailers.[45]

Traceability

Traceability to farm level is important for food safety and compliance. Supply chain mapping to trace suppliers in each tier of the supply chain has become an essential element of buyers' supply chain governance and risk mapping. The Seafood Task Force's membership agreement requires retailers, brands, food service providers, importers and processors to trace their shrimp supply chain back to the feed mill. It requires feed mills to trace back to the fishing vessel.[46]

(Social) auditing & third-party certification

Audits and certification provide external assessments of supplier compliance, supplementing inhouse due diligence and supplier visits. Auditors conduct inspections against a given standard (e.g. ISO 22000, on food safety management systems) and provide a third-party inspection report on compliance. Social auditors assess compliance with standards – such as those offered by Best Aquaculture Practices (BAP) or the Aquaculture Stewardship Council (ASC) – and certify producers. BAP has specific standards for hatcheries, shrimp farms, feed mills and processing factories. ASC has standards for feed mills and shrimp farms, covering environmental considerations, human rights and animal welfare. Upstream practices, including how buyers set prices and contractual terms, are not covered by certifications **yet these practices can place suppliers under strain, ultimately affecting their workers.**[47]

SPOTLIGHT: limitations of certification

Audit-based certification of human rights standards in seafood supply chains has come under increasing scrutiny for the limited role that it can realistically play in addressing labour rights risks. Social audits and certifications were developed to support responsible sourcing and can sometimes help to identify risks. However, evidence across sectors shows that they are often relied upon as proxies for effective oversight despite having inherent constraints.

Social audits capture working conditions at a specific moment in time and are shaped by commercial pressures that limit their depth and reliability. Research and practitioner evidence, including findings from Human Rights Watch, highlight how factors can undermine their ability to uncover systemic or hidden labour abuses.[48] Examples include short audit timeframes, reliance on management-provided information, preannounced inspections and conflicts of interest (particularly where suppliers pay for audits). These limitations reflect the design and

incentive structure of the audit model, rather than isolated instances of supplier dishonesty. While audits can be useful for identifying tangible, observable risks, they are generally ineffective at uncovering serious abuses, such as forced labour or gender-based violence and harassment. As such, certification and audit processes should be seen as one tool within a broader risk management toolbox. They are not a substitute for robust human rights due diligence.[49]

Importantly, audits and certifications do not address structural drivers of labour abuses, including buyer practices such as pricing pressure, short lead times, limited commitment to remediation, and restrictions on freedom of association and collective bargaining. Reliance on audits can obscure the extent to which companies' own sourcing and purchasing decisions contribute to risks. Effective human rights due diligence therefore requires companies to examine their own purchasing practices and to engage meaningfully with workers and communities, rather than relying solely on supplier-focused compliance tools.[50]

Certification also entails additional costs that are unevenly distributed along supply chains. While larger firms may absorb these costs, for small-scale shrimp farmers certification can increase production expenses without guaranteeing financial returns. This limits participation and market access. There are an estimated 1.8 million shrimp farmers in Asia.[51] Yet, as of January 2026, there were a total of 220 ASC-certified shrimp farm operations in India, Indonesia, Thailand and Vietnam, of which 106 were individual farms, 104 were multi-site certifications and 8 were group certifications.[52] This underscores the limited reach of certification schemes.

Social audits and certifications are therefore no substitute for human rights due diligence and should not be treated as evidence of compliance with human rights or environmental standards. More effective approaches require independent public oversight, meaningful engagement with workers and communities, respect for freedom of association and collective bargaining, and accountability for adverse impacts regardless of whether certification has been obtained.[53]

Worker representation

Grievance mechanisms are an essential component of supply chain governance, providing workers and their representatives with safe channels to raise concerns about working conditions. Grievance channels should be designed to be accessible and credible, and linked to meaningful worker representation. When this is the case, they complement broader human rights and environmental due diligence efforts, helping buyers to identify and address harms that might otherwise go unreported.

Meaningful worker representation goes beyond access to grievance mechanisms and entails recognising worker agency. Central to constructive social dialogue is recognising workers as legitimate actors who can participate in shaping solutions, negotiate terms and working conditions, and seek appropriate remediation when issues occur. Effective worker representation integrates workers into decision-making processes and operational practices by engaging in social dialogue and good-faith negotiations. It reinforces accountability and ensures that solutions respond to the realities and priorities of those affected.

SPOTLIGHT: grievance mechanism and worker representation

Access to effective grievance mechanisms is a core component of human rights and environmental due diligence and supply chain governance, as outlined in the UN Guiding Principles on Business and Human Rights (UNGPs).[54] The UNGPs require businesses to provide for or cooperate in remediation where they have caused or contributed to adverse impacts. Operational-level grievance mechanisms are a key means for identifying and remedying harms in supply chains when they meet criteria in areas such as accessibility, legitimacy, predictability and transparency. The process of designing and implementing grievance mechanisms is as important as the mechanism itself. Rightsholders and their representatives should be actively involved from the start to ensure transparency, trust and accessibility.

However, evidence shows that grievance mechanisms in global seafood supply chains often fall short of these expectations. For example, a benchmarking assessment of 30 seafood companies found that while some have mechanisms in place, only a minority provide robust grievance channels for external stakeholders, including workers in supply chains.[55] ETI research on grievance mechanisms in agriculture found that while they exist in theory, in practice grievance mechanisms are often inaccessible. Barriers to effective grievance mechanisms include workers' fear of retaliation from employers, limited knowledge of their rights under labour laws, and language barriers.[56]

In the shrimp supply chain, workers frequently experience informal working arrangements, migration-related vulnerability and job insecurity. These conditions further limit their ability to access or willingness to trust grievance mechanisms. Seafood-specific guidance emphasises the importance of safe, accessible grievance systems that respect worker privacy and dignity and provide clear follow-up and remediation procedures tailored to the realities of aquaculture and processing work.[57]

In a recent study conducted by ETI in the garment industry, suppliers voiced concern that grievance data is more likely to be used against them than to challenge buyer behaviour.[58] Such concerns can create commercial disincentives – among both workers and suppliers – to report adverse human rights outcomes. This dynamic risks discouraging the reporting of harms linked to purchasing practices, pricing, order volatility and other upstream drivers of risk. Companies should therefore see grievances not merely as problems but as valuable insights and opportunities to strengthen relationships with workers, farmers and communities.

Some grievance mechanisms may be used to undermine freedom of association if employers use their existence to avoid supporting trade unions and engaging in good faith collective bargaining.[59] Grievance mechanisms should therefore complement – but not replace – the right to unionise and bargain collectively.

Worker representation and trade union involvement are essential to the effectiveness of grievance mechanisms in the shrimp sector. Effective grievance systems should be designed and implemented with meaningful consultation and engagement with trade unions and worker representatives, as these actors are recognised stakeholders in identifying and addressing human rights risks. Trade unions and worker representatives can help to ensure that grievance processes are independent, credible and accessible, and they should be able to accompany workers through grievance procedures. The absence of worker representation can undermine the legitimacy of grievance systems and limit their ability to tackle systemic issues that go beyond individual workplace incidents.[60] Regular monitoring and continuous learning are essential to ensure mechanisms remain effective and embedded within the organisation's governance structures.

Human rights impact assessments

Human rights impact assessments (HRIAs) are a process for identifying, understanding, assessing and addressing the adverse effects of business activities on rightsholders. These include workers and members of the local community in which the business operates.[61] HRIAs use international human rights standards as benchmarks, adopt a human-rights-based approach, and focus on accountability for respecting human rights along the supply chain.[62] Like social auditing, they offer third-party insights into the conditions workers face, identifying key areas of risk and remediation strategies. However, they do not offer assurances of compliance.

Tesco[63] and Co-op, Sainsbury's and Lyons Seafood (jointly)[64] have published HRIAs of their Vietnam shrimp supply chain, conducted by Impactt. Lidl and Kroger have published an HRIA of their Indian shrimp supply chain, conducted by ELEVATE.[65] However, public HRIA reports of the shrimp supply chain contain limited assessment of the impact of the buyer's purchasing practices on human rights (see Figure 2).[66]

The structural compliance gap

Buyers increasingly rely on codes of conduct, audits, certification schemes and HRIAs to manage human rights risks in their supply chains. However, by focusing on downstream risk, these mechanisms fail to consider – or address – buyers' key commercial decisions, such as pricing, lead times, order volumes and contract duration.

Figure 2: The structural compliance gap in supply chain governance

When purchasing practices place sustained financial and operational pressure on suppliers, they can undermine suppliers' capacity to meet labour and human rights standards. This creates a structural compliance gap in which governance tools focus on monitoring supplier behaviour while the commercial drivers of risk remain unaddressed. Responsible purchasing practices (RPP) aim to address this gap by aligning pricing, order volumes, contract duration and payment terms with suppliers' ability to uphold labour rights. As such, they complement existing governance mechanisms and acknowledge shared responsibility. The remainder of this report seeks to make the case for going beyond supply chain governance to meaningfully address this gap through more RPP.

Sourcing decisions & purchasing practices

Purchasing practices – including technical specifications, forecasting, production planning, contracts, order placement and lead times, price negotiations, and payment terms – shape the relationship between buyer and supplier. This section examines how buyers' purchasing practices influence labour conditions along the shrimp supply chain. Drawing on ETI's Common Framework for Responsible Purchasing Practices in Food,[67] it demonstrates how adopting RPP can reduce risks of non-compliance with the ETI Base Code and support sustainable livelihoods for workers.

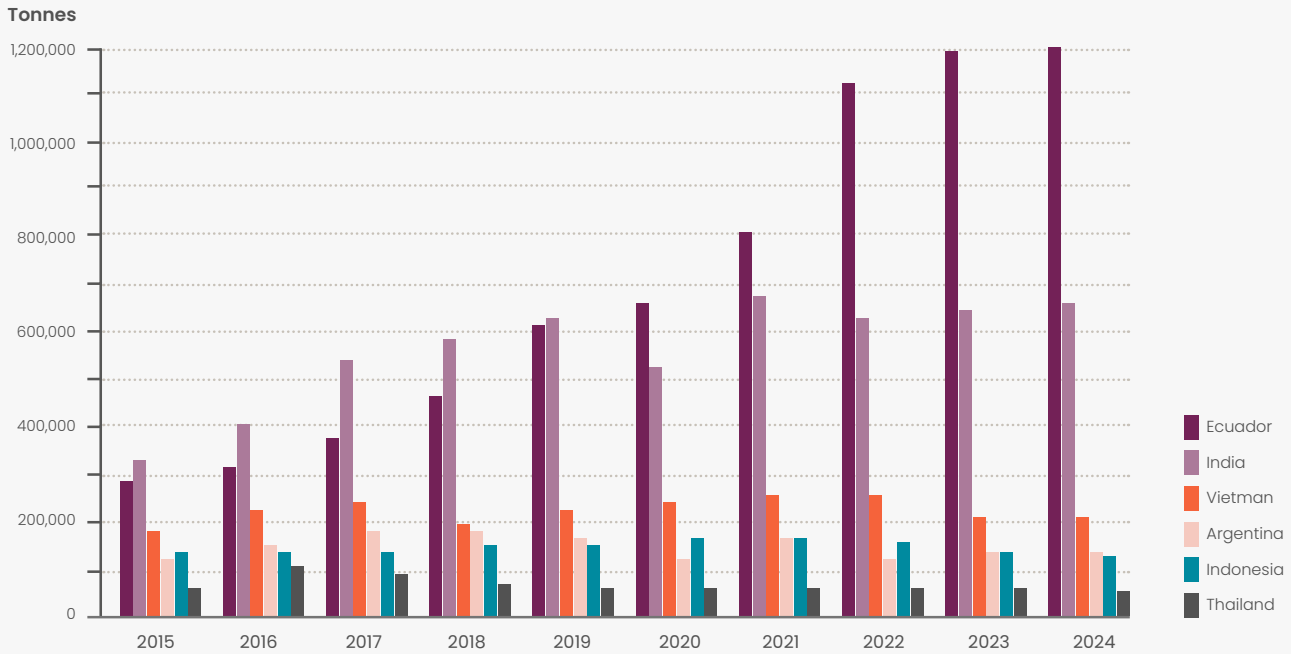
Research specifically on buyers' purchasing practices in the shrimp industry remains relatively limited. The following section thus draws on trade data to highlight key trends in sourcing decisions among buyers in the UK, USA, EU 27 and Australia. It then builds on these sourcing trends and secondary data on working conditions to examine the connection between purchasing practices and human rights violations along the shrimp supply chain.

Overview of sourcing trends

Frozen shrimp

In 2024, US$16.67 bn worth of frozen shrimp was exported, with six countries accounting for 81% of the total volume of shrimp exports. Over the past decade, the volume of global frozen shrimp exports has ballooned, increasing by 78%.[68] This growth has primarily been in two markets: Ecuador and India have grown by 318% and 81% respectively, now accounting for 40% and 22% of global frozen shrimp exports *(see Figure 3)*.

Figure 3: Top six exporters of frozen shrimp (HS 030617) by volume (tonnes), 2015–2024. *Source: ITC Trade Map*



In 2024, the average export prices per kilogram of frozen shrimp exported from Ecuador (US$5.76) and India (US$6.57) were both lower than the global average export price (US$6.59). The low price of frozen shrimp from Ecuador and India compared to other sourcing markets, coupled with the dramatic increase in the volume of shrimp sourced from Ecuador and India, suggests that low price remains a key factor in sourcing decisions *(see Table 1)*.

Table 1:
Market share and average export and import prices (US$/kg) of frozen shrimp (HS 030617) in 2024.

Source: ITC Trade Map

Export market	Share of global exports in 2024	Export volume in 2024 (tonnes)	Average export price in 2024	Ten-year price difference	Change in price, 2015–2024
World		2,997,546	$6.59	-$1.55	-19%
Ecuador	40%	1,194,387	$5.76	-$0.89	-13%
India	22%	666,398	$6.57	-$1.75	-21%
Vietnam	7%	220,750	$8.74	-$0.64	-7%
Argentina	5%	143,904	$6.40	$0.07	1%
Indonesia	5%	135,619	$8.01	-$1.14	-12%
Thailand	2%	56,241	$9.55	$0.39	4%

Import market	Share of global imports in 2024	Import volume in 2024 (tonnes)	Average import price in 2024	Ten-year price difference	Change in price, 2015–2024
World		2,720,508	$6.96	-$1.72	-20%
Ecuador	34%	916,025	$4.97	-$2.48	-33%
India	21%	581,814	$7.99	-$1.49	-16%
Vietnam	15%	411,970	$10.22	$2.27	29%
Argentina	5%	145,708	$8.45	-$2.11	-20%
Indonesia	2%	44,900	$9.04	-$2.35	-21%
Thailand	1%	21,023	$9.68	-$0.42	-4%

While the average export price fluctuates from year to year, the trade data shows that the global average price paid to shrimp production countries fell by 19% between 2015 and 2024. In 2024, the average price of frozen shrimp exported from India was US$1.75/kg less than the average price in 2015, a 21% reduction. In Ecuador the price fell by 13%, or US$0.89/kg, while in Indonesia the price fell by 12%, or US$1.14/kg.

In 2024, the USA imported 581,814 tonnes of frozen shrimp (21% of global production) at an average price of US$7.99. This was US$1.49 less than the average price the country paid for frozen shrimp imports in 2015 (US$9.48). In the UK, the average import price decreased by US$2.35/kg (21%) over the same period.

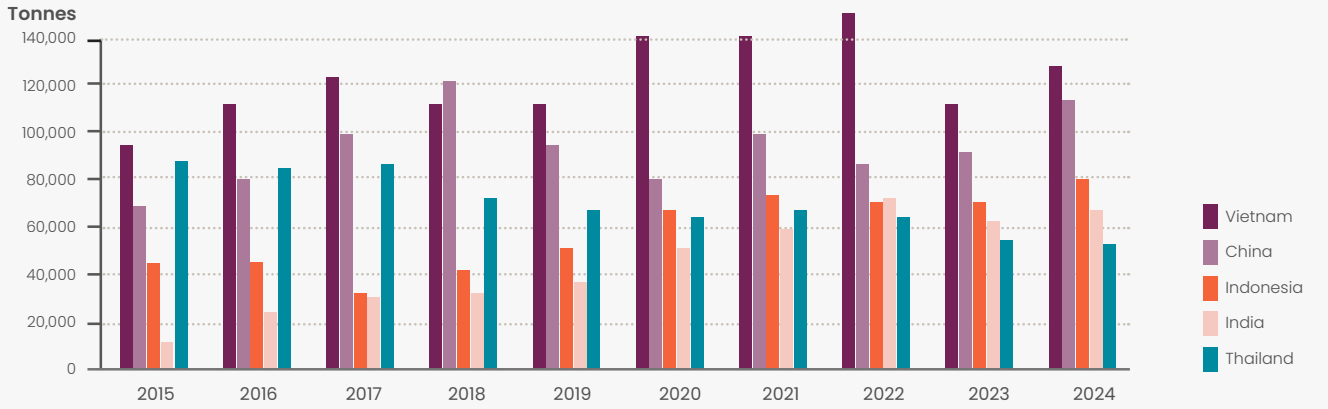
The trade data thus highlights the falling prices producer countries received.

Prepared & preserved shrimp

Vietnam, China, Indonesia, India, and Thailand dominate the global export market for processed shrimp, producing approximately 70% of prepared and preserved shrimp exports in 2024.[69] While the volume of processed shrimp exported from Thailand has declined over the past decade, exports from Vietnam, China, Indonesia and India have grown *(see Figure 4)*. Overall, there was a 45% increase in processed shrimp exports between 2015 and 2024.

Figure 4: Top five exporters of processed shrimp (HS 160521 and HS 160529 combined) by volume (tonnes), 2015–2024.

Source: ITC Trade Map



Similar to frozen shrimp exports, the average export price of processed shrimp declined between 2015 and 2024. The average global export prices of processed shrimp in airtight containers and not in airtight containers fell by 8% and 9% respectively. In 2024, the lowest export prices for processed shrimp were from India and Indonesia, both of which have seen price reductions and growing export volumes over the last decade. Trade data indicates that the average export price from Indonesia of shrimp in airtight containers fell by US$5.90/kg (from US$9.89/kg in 2015 to US$3.99/kg in 2024), a 60% reduction in price. In India, the price of processed shrimp in airtight containers and not in airtight containers fell by US$1.60/kg and US$1.95/kg respectively over the same period. Vietnam, the largest exporter of processed shrimp, has similarly seen a decline in prices, particularly for shrimp in non-airtight containers, which fell by US$1.13/kg, or 10% *(see Table 2)*.

Table 2: Market share and average export prices (US$/kg) of preserved and prepared shrimp in airtight and non-airtight containers (HS 160529 and HS 160521) in 2024.

Source: ITC Trade Map

HS 160529: Processed shrimp and prawns in airtight containers					
Source market	**Share of global exports in 2024**	**Export volume in 2024 (tonnes)**	**Average export price in 2024**	**Ten-year price difference**	**Change in price, 2015–2024**
World		411,787	$10.24	-$0.93	-8%
Vietnam	23%	94,397	$11.91	-$0.28	-2%
China	21%	88,506	$14.38	$3.21	29%
India	14%	56,474	$8.97	-$1.60	-15%
Thailand	8%	33,984	$10.28	-$1.37	-12%
Indonesia	7%	29,341	$3.99	-$5.90	-60%
HS 160521: Processed shrimp and prawns in non-airtight containers					
Source market	**Share of global exports in 2024**	**Export volume in 2024 (tonnes)**	**Average export price in 2024**	**Ten-year price difference**	**Change in price, 2015–2024**
World		215,011	$9.57	-$0.92	-9%
Indonesia	23%	49,061	$8.21	$0.79	11%
Vietnam	15%	32,030	$10.41	-$1.13	-10%
China	12%	25,471	$12.15	$0.84	7%
Thailand	9%	18,736	$10.53	-$0.03	0%
Netherlands	6%	12,350	$10.47	-$0.22	-2%
India	5%	10,276	$7.52	-$1.95	-21%

Combined, the USA and EU 27 imported approximately 51% of global processed shrimp production in 2024.[70] The EU 27 is the largest importer of processed shrimp in airtight containers (HS 160529) while the USA is the largest market for processed shrimp not in airtight containers (HS 160521) *(see Table 3)*.

Table 3: Market share and average import prices (US$/kg) of preserved and prepared shrimp in airtight and non-airtight containers (HS 160529 and HS 160521) in 2024.

Source: ITC Trade Map

HS 160529: Processed shrimp and prawns in airtight containers					
Source market	**Share of global exports in 2024**	**Export volume in 2024 (tonnes)**	**Average export price in 2024**	**Ten-year price difference**	**Change in price, 2015–2024**
World		188,566	$7.21	-$2.56	-26%
EU 27	42%	79,439	$9.45	-$0.56	-6%
UK	7%	13,396	$10.00	-$0.54	-5%
USA	5%	8,685	$12.43	$0.32	3%
Canada	3%	5,581	$9.35	$2.52	37%
Australia	3%	5,028	$8.36	-$0.40	-5%
HS 160521: Processed shrimp and prawns in non-airtight containers					
Source market	**Share of global exports in 2024**	**Export volume in 2024 (tonnes)**	**Average export price in 2024**	**Ten-year price difference**	**Change in price, 2015–2024**
World		386,076	$8.99	-$1.05	-10%
USA	44%	169,161	$9.06	-$0.87	-9%
EU 27	17%	65,442	$8.93	-$1.15	-11%
Japan	16%	61,128	$9.57	-$1.23	-11%
UK	5%	18,414	$10.21	-$2.41	-19%
Australia	2%	8,763	$9.20	-$0.32	-3%

Table 3 demonstrates that, like the frozen shrimp prices, the prices paid for processed shrimp in 2024 were lower than the prices paid in 2015.

SPOTLIGHT: on the UK market

According to Seafish, between 2016 and 2025 the average retail price of warm-water shrimp sold in the UK increased by 18.9%, reaching £17.31/kg.[71]

In the same period, the average price of frozen warm-water shrimp imported by the UK fell by 9%, from £7.78/kg to £7.07/kg, a £0.71kg reduction.[72] For Ecuadorian frozen shrimp, the import price fell by £1.24kg (from £6.58/kg in 2016 to £5.34 in 2024), a 19% reduction. The average import price of Indian frozen shrimp fell by 11% (£0.74/kg), from £6.81/kg in 2016 to £6.07/kg in 2024. The average price of processed shrimp sourced from Indonesia also fell significantly. Between 2016 and 2024, the price of preserved shrimp in airtight containers fell by 41%, a reduction of £2.93/kg, while the price of shrimp not in airtight containers fell by 24%, a reduction of £1.84/kg.[73]

Therefore, while UK retailer shrimp prices increased by 18.9% between 2016 and 2025, for producers in Ecuador, India and Indonesia, prices fell by between 11% and 41%.

As the graph summarising import and retail prices between 2022 and 2025 shows, the average import price fell year on year. Yet the average price paid by consumers in the UK rose year on year.

Impact of purchasing practices on human rights risks

Research has demonstrated that poor purchasing practices – such as downward price pressure and poor forecasting and planning – negatively impact suppliers' ability to plan production. This has knock-on effects for workers and on working conditions (see Figure 5).[74] RPP provide a necessary foundation for credible human rights due diligence, helping to ensure buyers meet international expectations.

The remainder of this report draws on research findings from other sectors, notably the garment industry, to discuss how various elements of purchasing practices influence working conditions along shrimp supply chains. It builds on the Common Framework for Responsible Purchasing Practices in Food to provide recommendations to buyers and retailers on improving their purchasing practices in shrimp supply chains (see Figure 6). Throughout these recommendations, RPP are treated as a core element of effective human rights due diligence.

Figure 5: Summary of risks of non-compliance with the ETI Base Code relating to poor purchasing practices

Figure 6: The five principles of the Common Framework for Responsible Purchasing Practices in Food - Ethical Trading Initiative

PRINCIPLE 1:
Internal Integration

The purchasing company has top leadership buy-in and commitment to RPPs, and through understanding of existing suppliers and purchasing systems, and their potential impact on human rights. This information is used to develop an improvement plan.

RPPs are integrated into buying and other relevant departments of the business.

This includes:
- Internal engagement and responsibilities
- Risk/impact assessment
- Improvement plan
- Internal training
- Cross-functional communication channels
- Integrated strategy and decision making
- Internal accountability and performance evaluation
- Tracking progress
- External reporting

PRINCIPLE 2:
Equal partnership

The purchasing company and their suppliers respect each other as equal business partners, engage in respectful sourcing dialogue, and pursue win-win situations, with a shared responsibility for improving working conditions.

This includes:
- Communicating commitment to RPPs
- Agreement on mutaual responsibilities
- Stable, long term sourcing relationships
- Partnership approach to communication and problem solving
- Effective feedback mechanisms
- Supporting continuous improvement
- Evaluating and insentivising suppliers
- Awareness of leverage and dependancy
- Employing responsible exit strategies

PRINCIPLE 3:
Collabrative production planning

Critical path and production planning are done collaboratively between the purchasing company and suppliers, with a fair distribution of risk and accountability.

This includes:
- Mutually agreed, reasonable lead times
- Critical path adherence
- Providing acurate specifications
- Improving forecasting accuracy and communication
- Mitigating impacts of fluctuating orders
- Balancing orders

PRINCIPLE 4:
Fair payment terms

The purchasing company and suppliers agree on fair and transparent payment terms that do not place a disproportionate burden on one party.

Contractual obligations are honoured. Payments are made in full and on time.

This includes:
- Ensuring payments are made on-time.
- Aiming to improve payment timelines.
- No retrospective changes to mutually agreed prices.
- Mutually agreeing reasonable penalties, considering the cause of any delay in delivery.
- Aiming to reduce penalties.
- Promoting fair payment terms through the supply chain.

PRINCIPLE 5:
Sustainable costing

The costing levels and procedures of the purchasing company support wage increases and sustainable production.

Prices cover all costs of production in line with responsible business conduct and allow for a reasonable and maintained supplier profit margin.

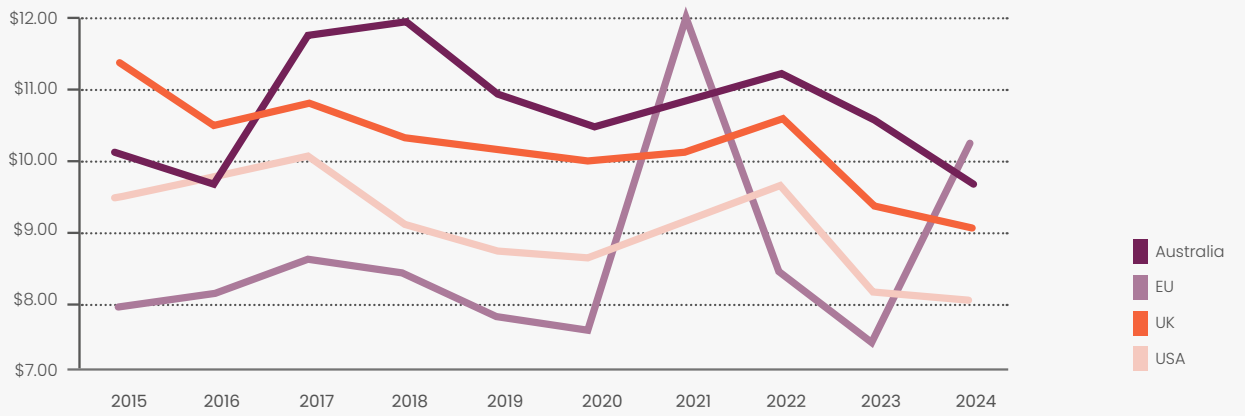
This includes:
- Developing mechanisms to ensure costing allows for all labour costs
- Incorporating wage and cost increases (through national minimum wages and/or collective bargaining).

Advanced practices:
- Pricing allows for wage increases towards living wages

Downward price pressure

Trade data demonstrates how the prices of both frozen and processed (value-add) shrimp have fallen across most key sourcing locations over the past decade (see Figure 7). While an increase in supply to meet growing demand has likely been a factor in pushing down prices, research on shrimp supply chains argues that downward price pressure from buyers is also a significant factor.[75]

Figure 7: Average import prices (US$/kg) of frozen shrimp (HS 030617), 2015–2024. *Source: ITC Trade Map*



Contracts between buyers and suppliers may include clauses related to remaining price competitive or enabling buyers to break the contract and source elsewhere if they find a cheaper supplier. Such clauses embed a culture of low-cost production over respect for human rights or environmental protection along the supply chain, contrary to the expectations articulated in buyers' codes of conduct. This practice is observed in many sectors. However, the growing volume of shrimp being sourced from producer countries with the lowest prices demonstrates to suppliers that the risk of their buyers relocating to cheaper sourcing locations is not an empty threat.

Downward price pressure on suppliers exporting frozen or processed shrimp products to buyers in Australia, the EU 27, the UK and the USA cascades price pressure along the supply chain. This impacts working conditions and labour standards throughout the production process. Research has shown that downward price pressure impacts labour rights in the shrimp sector. This is particularly the case when employment conditions – such as piece-rate wages and informal work with no set hours – are designed to push the risk of fluctuating market prices onto workers.[76] Piece-rate wages in the primary processing of shrimp have been documented in India, Indonesia, Thailand and Vietnam.[77] In Vietnam, research found that 97% of interviewed workers were paid based on yield and market prices, rather than being paid a pre-agreed wage.[78] Indeed, the research found that workers now have to labour harder to increase yield, yet are still earning less than they did before the pandemic.[79] Downward price pressure thus has a direct impact on workers' earnings, as lower market prices mean lower remuneration for workers producing shrimp.

Recommendations for buyers

Ensure contractual terms with suppliers and product pricing support rather than undermine suppliers' ability to comply with national labour laws, international labour standards and the buyer's code of conduct. Align contracts with human rights due diligence principles, establish mutual responsibility for human rights, and provide suppliers with the certainty and resources they need to respect workers' rights and meet social and environmental obligations.

Food Framework principles

2: Equal Partnership **5: Sustainable Costing**

Sourcing below the cost of production

While the average export price of shrimp has decreased, **production costs have not fallen at a corresponding rate.** Indeed, trade data indicates that the average export price of fish meal flour (used for shrimp feed) rose by 8% over the same period.[80] Research in Vietnam found that the cost of shrimp feed increased by 15–25% between 2021 and 2024.[81] The Global Seafood Alliance and RaboResearch, which conduct an annual survey of shrimp farmers, report that producers' biggest concerns are the market price of shrimp and the cost of shrimp feed.[82] Drawing on data collected with 500 workers and 100 producers in India, Indonesia and Vietnam, the Sustainability Incubator demonstrates that downward price pressure in the shrimp supply chain and high input costs are leading to below-cost sourcing.[83] As a result, buyers in the EU 27, UK and USA are sourcing shrimp for less than it costs to produce.

In 2016, an ILO and ETI survey of 1,454 suppliers in 87 countries found that 39% of suppliers had felt compelled to accept an order below its cost of production to keep their competitive advantage and secure future orders. Subsequently, 29% experienced difficulties in paying workers' wages. The research found that prices below the cost of production led to 11% lower wages.[84]

Sourcing below the cost of production will inevitably drive shrimp producers to implement cost-saving measures to reduce their losses. As shrimp farmers have limited control over other input costs, such as shrimp seed, feed, medication and fuel, labour costs are the most likely to be squeezed. In 2024 the Sustainability Incubator found that in India, Indonesia and Vietnam, this had resulted in work days of 9–14 hours for a 20–60% reduction in workers' earnings (across multiple tiers) compared to before the pandemic.[85] Even prior to the pandemic, research in Thailand found that workers were reporting job losses, higher production targets and delayed wage payments. Their employers were also asking them to work harder and wait longer for their wages, reportedly telling them the company was not making a profit.[86]

Recommendations for buyers

Commit to ensuring that the price paid for shrimp covers the full cost of production, including (at an absolute minimum) paying the legal minimum wage and social security benefits along the supply chain. Ensure these efforts are informed by periodic reviews and engagement with stakeholders to understand the true cost of production. Establish internal mechanisms to ensure that price negotiations do not fall below these levels. Ensure costing allows for reasonable and maintainable supplier profit margins, to reduce the risk that profit margins will be maintained by violating workers' rights. Clearly stipulate this commitment, along with concrete requirements, within buyer–supplier contracts.

Food Framework principle 5: Sustainable Costing

Failure to incorporate increases in the minimum wage into pricing

When buyers threaten to relocate – or actually relocate – when prices increase, it undermines suppliers' ability to incorporate increases in the minimum wage into product pricing.

A 2021 survey of 1,000 garment suppliers in Bangladesh found that almost one in five suppliers struggled to pay workers the minimum wage.[87] The survey revealed that small operations were the most likely to struggle to pay workers and to receive below-cost prices.[88] The above-mentioned evidence collected by the Sustainability Incubator, documenting a 20–60% decrease in worker earnings across multiple tiers, suggests that difficulty paying the minimum wage is a significant risk in the shrimp supply chain.

The minimum wages in Ecuador,[89] India[90] and Vietnam[91] increased in 2024, and the minimum wage in Thailand increased on 1 January 2025.[92] Despite these increases, the trade data in Table 4 demonstrates that the 2024 average export prices of frozen shrimp from Ecuador, India and Thailand were lower than the average prices in 2023, while the price of Vietnamese shrimp remained unchanged.

Table 4: Average prices per unit (US$/kg) of frozen shrimp exports (HS 030617) in 2023 and 2024. *Source: ITC Trade Map*

HS 030617: Frozen shrimp and prawns			
	2023	2024	Price difference, 2023–2024
Ecuador	$5.93	$5.76	-$0.17
India	$6.64	$6.57	-$0.07
Vietnam	$8.74	$8.74	$0.00
Indonesia	$7.94	$8.01	$0.07
Thailand	$10.07	$9.55	-$0.52

Recommendations for buyers

Develop mechanisms to ensure that rising production costs, particularly increases in the minimum wage or in wage rates covered by collective bargaining agreements, are incorporated into product pricing. In line with the ETI Base Code, ensure pricing structures progressively allow for increases in wages towards a living wage along the supply chain.

Food Framework principle 5: Sustainable Costing

Poor forecasting & planning

The Better Buying Purchasing Practices Index 2025, in which 1,360 garment suppliers participated, found that suppliers rated sourcing and order placement, and planning and forecasting, as buyers' two weakest areas.[93] The report notes that 'forecasting continues to be a critical area where buyers fall short, causing major instability for suppliers'.[94] The 2016 ILO and ETI survey found that only 17% of suppliers usually had enough lead time to fill orders, with most suppliers reporting that 30–50% of the time they did not have sufficient lead time.[95] As a result, 59% of suppliers reported that insufficient lead time led to overtime work.[96]

It takes three to six months to produce a crop of shrimp on an aquaculture farm, and shrimp are highly sensitive to environmental conditions and changes. Amid growing market demand, producers need accurate forecasts in order to effectively plan the production process (including volume) and develop contingency plans. Fluctuating demand can directly impact working conditions. When there

is too much shrimp available to process, factories and peeling sheds may resort to hiring additional temporary workers. Alternatively, as noted above, they may outsource shrimp peeling to home-based workers. In both cases, the workers have fewer labour rights and no employment security.[97] When there is too little demand or too few shrimp available, informally employed primary processing workers have no work and thus no income.[98]

Recommendations for buyers

Engage in collaborative production planning with suppliers. Provide accurate forecasts of order specifications, frequency, volume, delivery dates and certification requirements, while recognising that shrimp naturally vary in size. Engage in regular, ongoing dialogue with suppliers regarding the labour minute costing involved in fulfilling an order – based on reasonable productivity targets that allow for sufficient breaks and fair remuneration in line with national labour laws – and plan lead times accordingly.

Food Framework principle
3: Collaborative Production Planning

Hyper-flexibility & last-minute changes to orders

Research on other sectors has demonstrated that hyper-flexibility in orders, including last-minute changes to order volume, leads to reliance on a temporary workforce. Such workers are often hired through labour subcontractors, with fewer labour rights and no employment stability, to fulfil fluctuating order volumes.[99] Indeed, the 2016 ILO and ETI survey data from 1,454 suppliers in 87 countries shows that buyers' requirements for hyper-flexibility had led to 6% lower wages. To cope with peaks in demand, 60% of suppliers relied on overtime, 37% on hiring temporary workers and 16% on subcontracting.[100]

Across India, Indonesia, Thailand, and Vietnam, intermediaries enable processors to procure the required volume of shrimp to fulfil buyers' orders. However, farmers receive lower prices than when they sell directly to processing factories. In Vietnam, shrimp farmers and fishing vessel owners report that processors are increasingly requiring them to sell to intermediaries, undermining their ability to obtain the higher prices previously offered directly by factories.[101] As noted above, this directly impacts workers' earnings, particularly when their income is linked to the market price and the volume of shrimp produced or peeled. The flexibility demanded by buyers is thus pushed down the chain, with direct impacts for the earning potential of producers – and thus workers – in the lower tiers.

Recommendations for buyers

Invest in building long-term, equal partnerships with suppliers that allow for stable sourcing relationships and sufficient time to plan the production process. Adopt a partnership approach to communication and problem solving, providing timely notice of any changes in orders and sufficient lead times to implement them. Ensure that any cost implications arising from changes to an order after a price has been agreed are shared fairly between buyers and suppliers, rather than being transferred down the supply chain.

Food Framework principles

2: Equal Partnership **3: Collaborative Production Planning**

Delayed payments & long payment terms

A white paper produced by garment suppliers through the Sustainable Terms of Trade Initiative argues that delayed or long payment schedules mean suppliers often finance buyers' business for several months.[102] Long payment schedules require producers to finance production, including by purchasing raw materials and paying workers' wages, prior to being paid by retailers. When retailers and buyers have unfavourable payment terms or apply financial penalties to orders, this can put financial stress on suppliers, particularly when combined with poor forecasting and planning. As discussed above, this financial stress can create highly pressured work environments that undermine occupational safety and health, contribute to harassment from supervisors to meet high production targets, and lead to long hours and unpaid overtime.

Recommendations for buyers

Agree fair and transparent payment terms with suppliers that do not place a disproportionate burden on one party and that enable suppliers to pay workers in a timely manner. Make payments according to contractually agreed timescales and in full, with no retrospective or unilateral changes to mutually agreed prices. Be mindful of unequal bargaining power when negotiating payment terms and timelines and seek to build equitable partnerships that account for power differentials.

Food Framework principle

4: Fair Payment Terms

Uneven distribution of risk

The Responsible Contracting Project argues that 'risk shifting is not the same thing as risk management. For human rights, effective risk management requires risk sharing and co-operation between the parties, including on matters related to the commercial terms and practices.'[103] The structure of the shrimp supply chain disproportionately concentrates risk with shrimp farmers and small-scale processing operations.

Shrimp farming is impacted by environmental conditions and vulnerable to disease. Climate-change-induced shifts in weather patterns, such as flooding, drought and excess heat, impact the quality and volume of the shrimp harvest. Outbreaks of disease can decimate shrimp crop harvests. When shrimp crops fail or farm gate prices crash, shrimp farmers can be pushed into debt they struggle to repay. In contrast, the profits of the companies producing the farm inputs (e.g. shrimp feed) remain more stable.[104] This concentrates the financial risk – and the subsequent social and environmental risks – involved in shrimp farming with shrimp farmers.

In Ecuador, India, Indonesia, Thailand and Vietnam, the shrimp supply chain is vertically integrated. Large corporations dominate multiple stages of shrimp production, including breeding and hatching, feed milling and production, processing, export, and distribution. This concentrates power in these corporations, limiting the bargaining power of the millions of shrimp farmers and thousands of small-scale primary processing operations. Shrimp farmers and small seafood-processing companies thus have limited power to negotiate when retailer and buyer price squeezes are cascaded along the supply chain. Similarly, they have few options when retailers demand large volumes of a single size of shrimp from a naturally size-distributed harvest.

Recommendations for buyers

Work with shrimp exporters and processors to more equitably distribute risk along the shrimp supply chain. Ensure these efforts include accountability mechanisms for cascading sustainable pricing and commitments to living wages down to small-scale processing operations and shrimp farms. Understand climate-related risks and support a just transition by proactively working with suppliers to adapt to climate impacts, ensuring that the costs of adaptation and transition are not borne disproportionately by workers, farmers or small-scale producers. Periodically assess the human rights impacts of shrimp farming and primary processing on workers and communities, including how buyers' purchasing practices – for example, relating to pricing, order volumes and contract terms – contribute to these risks. Use the findings to establish timebound corrective action plans with technical and financial support for implementation. Create mechanisms for suppliers and other stakeholders to provide feedback on both human rights impacts and purchasing practices, ensuring that commercial decisions actively reduce, rather than exacerbate, risks.

Food Framework principles

1: Internal Integration
2: Equal Partnership
3: Collaborative Production Planning
5: Sustainable Costing

Failure to incorporate the cost of compliance

Sustainability requirements – such as compliance with the buyer's code of conduct or the ETI Base Code, audits and certification, and investments in improving occupational safety and health – come at a cost. Yet research notes that buyers are not yet incorporating these costs into seafood prices or providing other market rewards.[105]

Failure to build buyers' sustainability requirements into product pricing can increase production costs for producers and reduce the incentive for compliance. This can undermine buyers' ability to cascade adherence to their code of conduct or ensure accountability for compliance. In Thailand, export-oriented seafood-processing factories have experienced pressure for social compliance from buyers following media attention to forced labour in shrimp supply chains. However, suppliers report little to no increase in price or market reward.[106] Indeed, trade data shows that companies have reduced the volume of Thai shrimp that they procure, opting to source from Vietnam, Indonesia and India instead. In 2015, Thailand made up 26% (73,234 tonnes) of global exports of prepared and preserved shrimp not in airtight containers, whereas now it exports just 9% (18,736 tonnes).[107] This represents a 74% decrease in the volume of processed shrimp exports from Thailand.

Recommendations for buyers

Demonstrate commitment to suppliers that invest in improving working conditions. Compensate compliance with buyer-stipulated sustainability requirements in a way that is meaningful in business terms. Provide technical and financial support to suppliers that wish to improve compliance and progressively work towards paying a living wage, in line with the ETI Base Code. Seek to ensure that requirements for social auditing and certification do not disproportionately benefit large corporate shrimp farms and operations over the large majority of small-scale shrimp farms. This includes supporting small-scale farmers to meet compliance requirements and reimbursing the cost of social auditing and certification where needed, so as to enable continuous improvement along the supply chain.

Food Framework principles 1: Internal Integration 4: Fair Payment Terms 5: Sustainable Costing

Conclusion

This report shows that purchasing practices are a central factor shaping labour conditions along shrimp supply chains. While further research on shrimp-specific purchasing practices is needed, the evidence presented demonstrates that sustained downward price pressure and other commercial dynamics are contributing to human and labour rights risks in multiple tiers of the supply chain.

Ignoring these risks has tangible consequences. It exposes companies to growing legal, financial and reputational costs. New regulatory frameworks such as the EU Corporate Sustainability Due Diligence Directive (CSDDD) will require companies to identify and mitigate adverse human rights and environmental impact throughout their supply chains, with penalties of up to 5% of net worldwide turnover for non-compliance.[108] The EU Forced Labour Regulation, set to be fully in effect by December 2027, will prohibit the sale or export of goods made with forced labour. It will also allow national authorities to seize and remove noncompliant products from the EU market.[109] Commercial decisions that fail to account for supplier conditions therefore directly increase legal exposure and threaten market access.

Despite these risks, individual companies often struggle to act effectively on their own. Competitive pressures, short-term commercial priorities, and internal misalignment between sustainability and commercial teams can limit voluntary action, leaving labour risks unaddressed. Collective approaches provide a practical way forward: by aligning expectations and practices, companies can reduce shared risks, strengthen supplier relationships and support improvements in labour standards.

To ensure respect for human rights, in line with the UNGPs and OECD Guidelines, retailers and buyers of shrimp must look beyond traditional supply chain governance tools. This requires examining how their purchasing practices and commercial decisions affect suppliers' ability to uphold labour standards and, in turn, the workers involved in producing the shrimp they sell. ETI's shrimp RPP project offers a structured opportunity for retailers and food service companies to engage collectively, reflect on their purchasing practices, and begin implementing changes that support more sustainable and rights-respecting supply chains.

Responsible purchasing practices in shrimp supply chains initiative

An ETI programme

Looking ahead, expectations are shifting. Regulator, investor and civil society scrutiny is intensifying, and companies that engage now will be better positioned to shape workable solutions rather than react to externally imposed requirements. RPP enable retailers and food companies to build stronger, collaborative relationships with suppliers that promote ethical and sustainable production.

ETI is leading a multi-year, multi-stakeholder project bringing together retailers, food companies, farmers, exporters, processors, civil society, trade unions and labour experts to trial and promote practices that reduce labour risks and align with international human rights standards. Through participation companies can:

Align commercial and sustainability teams on responsible sourcing

Pilot purchasing practices that reduce risks and improve worker outcomes

Access shared learning to support wider industry adoption and inform policy

Be Part of the ETI RPP in Shrimp Supply Chain Initiative

ETI invites all retailers and food companies to join the project and proactively influence how the shrimp supply chain evolves, implementing practices that are practical, responsible and verifiable.

How to join

Reach out: Email Melissa Karadana at melissa.karadana@eti.org.uk

Learn more: Get all the details about the project, its goals, and what participation involves.

Get started: Begin contributing your ideas and practices to help create a more sustainable, ethical shrimp supply chain.

End Notes

1 The International Labour Organization (ILO) Fundamental Principles and Rights at Work *are rights workers are entitled to regardless of whether their state has ratified the core ILO conventions. They are:*
- *'freedom of association and the effective recognition of the right to collective bargaining*
- *the elimination of all forms of forced or compulsory labour*
- *the effective abolition of child labour*
- *the elimination of discrimination in respect of employment and occupation*
- *a safe and healthy working environment'. [accessed 20 Jan 2026].*

2 ETI, ETI Base Code *(nd). [accessed 20 Jan 2026].*
3 Worldwide Aquaculture, Shrimp aquaculture: *Why hatchery management is the heart of healthy shrimp farming (16 Jan 2025).[accessed 6 Jan 2026].*
4 Sustainability Incubator, When more means less: *supermarket purchasing power and the decline of producer prices and working conditions in the shrimp sector (2024). [accessed 20 Jan 2026].*
5 Sustainability Incubator, Laboring for less so supermarkets profit more *(2024).*
6 Corporate Accountability Lab (CAL), Hidden harvest: *human rights and environmental abuses in India's shrimp industry (2024). [accessed 20 Jan 2026].*
7 *CAL, Hidden harvest.*
8 *Sustainability Incubator, When more means less.*
9 *Sustainability Incubator, When more means less.*
10 A Sharma et al, Occupational hazards of Indian shrimp farm workers, *All Life, Volume 16, Number 1 (Taylor & Francis, 2023). [accessed 20 Jan 2026].*
11 *Sharma et al, Occupational hazards of Indian shrimp farm workers.*
12 *CAL, Hidden harvest; Sharma et al, Occupational hazards of Indian shrimp farm workers.*
13 *Sustainability Incubator, Laboring for less so supermarkets profit more.*
14 *YE Prasetyo & EP Sari, Final report:* Business and human rights in the fisheries sector: *the role and support of stakeholders in shrimp aquaculture (International NGO Forum on Indonesian Development, 2022). [accessed 20 Jan 2026].*
15 *CAL, Hidden harvest; ELEVATE,* Human rights impact assessment: farmed shrimp in India *(2023). [accessed 20 Jan 2026]; Sharma et al, Occupational hazards of Indian shrimp farm workers.*
16 Impactt, Human rights impact assessment Vietnam prawn supply chain: *public report (2022). [accessed 20 Jan 2026].*
17 *Sharma et al, Occupational hazards of Indian shrimp farm workers.*
18 *CAL, Hidden harvest; P Vandergeest, M Flaherty & P Miller,* A political ecology of shrimp aquaculture in Thailand, Rural Sociology, *Volume 64, Number 4 (Wiley, 2009). [accessed 20 Jan 2026].*
19 International Trade Union Confederation (ITUC), *Global Rights Index 2025 (nd). [accessed 20 Jan 2026].*
20 Monterey Bay Aquarium (MBA), Warmwater shrimp social risk profile: *forced labor, human trafficking, and hazardous child labor risks – Ecuador, aquaculture and processing (Seafood Social Risk Tool V2, 2025). [accessed 20 Jan 2026].*
21 *MBA, Warmwater shrimp social risk profile.*
22 S Mohanty, Indian shrimp farming industry: *a fact sheet (JALAJA Newsletter, 2022), pp11–16. [accessed 20 Jan 2026].*
23 *Sustainability Incubator, When more means less; Vandergeest et al, A political ecology of shrimp aquaculture in Thailand.*
24 Future Market Insights, 'Shrimp feed market size and share forecast outlook 2025 to 2035' *(6 Jul 2025). [accessed 24 Jan 2026].*
25 Seafish, White leg prawn: *Litopenaeus vannamei – feed (nd). [accessed 5 Jan 2026].*
26 *K Hodel, C Kelly & F Lawrence, Revealed:* Asian slave labour producing prawns for supermarkets in US, UK *(The Guardian, 10 June 2014). [accessed 20 Jan 2026].*
27 International Trade Centre (ITC), Trade Map: *HS 230120.*
28 *S Nagavajara et al,* Supply chain study on forced labor and child labor in the fishing industry in Peru *(US Department of Labor, 2024). [accessed 20 Jan 2026].*
29 *Sustainability Incubator, Laboring for less so supermarkets profit more.*
30 Shrimp Insights, The global shrimp feed manufacturing landscape: *a helicopter view (2023). [accessed 20 Jan 2026].*
31 *Sustainability Incubator, When more means less.*
32 ILO, Endline research findings on fishers and seafood workers in Thailand *(2020). [accessed 20 Jan 2026]; International Organization for Migration (IOM),* In the shadow of the ships: Indonesia *(2023). [accessed 20 Jan 2026].*
33 *CAL, Hidden harvest;* IOM, In the shadow of the ships: Indonesia; IOM, In the shadow of the ships: Thailand *(2023). [accessed 20 Jan 2026]; J Stride,* Precarity and the pandemic: a survey of wage issues and Covid-19 impacts among migrant seafood workers in Thailand *(Oxfam & Civil Society Organization Coalition for Ethical and Sustainable Seafood, 2021). [accessed 20 Jan 2026]; Sustainability Incubator, Laboring for less so supermarkets profit more.*
34 *CAL, Hidden harvest; IOM, In the shadow of the ships: Indonesia; Sustainability Incubator, Laboring for less so supermarkets profit more.*
35 *ILO, Endline research findings on fishers and seafood workers in Thailand; Sustainability Incubator, When more means less.*
36 *Oxfam & Sustainable Seafood Alliance Indonesia,* Supermarket responsibilities for supply chain workers' rights: *continuing challenges in seafood supply chains and the case for stronger supermarket action (2018). [accessed 20 Jan 2026].*
37 *Sustainability Incubator, When more means less.*
38 *CAL, Hidden harvest; B Harkins,* Working conditions for migrant workers in Thailand's blue economy, in Thailand Migration Report *(2024), pp142–165. [accessed 20 Jan 2026].*
39 *CAL, Hidden harvest; I Urbina et al,* The whistleblower, in India shrimp: *a growing goliath – the true price of a cheap appetizer (The Outlaw Ocean Project, 2024). [accessed 20 Jan 2026].*
40 *ELEVATE, Human rights impact assessment: farmed shrimp in India.*
41 *Harkins, Working conditions for migrant workers in Thailand's blue economy.*
42 *MBA, Warmwater shrimp social risk profile.*
43 *United Nations,* Guiding Principles on Business and Human Rights *(2011). [accessed 20 Jan 2026]; OECD,* Guidelines for Multinational Enterprises on Responsible Business Conduct *(2023). [accessed 20 Jan 2026].*
44 *Organisation for Economic Co-operation and Development (OECD),* Due Diligence Guidance for Responsible Business Conduct *(2018). [accessed 20 Jan 2026].*
45 *SeaChoice,* Conscious avoidance: *how Canadian retailers steer clear of due diligence on seafood amid growing evidence of abuse (2025). [accessed 20 Jan 2026].*
46 *Seafood Task Force, STF.G.T.001:* STF shrimp traceability protocol *(2020). [accessed 20 Jan 2026].*
47 *A Kashyap,* 'Obsessed with audit tools, missing the goal': *why social audits can't fix labor rights abuses in global supply chains (Human Rights Watch, 2022). [accessed 20 Jan 2026].*
48 *Kashyap, 'Obsessed with audit tools, missing the goal'.*
49 *Ethical Trade Initiative (ETI),* Getting started on leather due diligence: a good practice guide for brands and retailers *(2025). [accessed 20 Jan 2026].*
50 *Kashyap, 'Obsessed with audit tools, missing the goal'.*
51 *Sustainability Incubator, When more means less.*
52 *Data from* https://asc-aqua.org, *13 January 2026.*

53 *Centre for Research on Multinational Corporations (SOMO),* The illusion of assurance: How certification and auditing mask corporate abuse *(2025).*
54 *United Nations,* Guiding Principles on Business and Human Rights *(2011). [accessed 20 Jan 2026].*
55 *World Benchmarking Alliance, 2023* Seafood Stewardship Index: *insights report (2024). [accessed 26 Jan 2026].*
56 *ETI,* Grievance mechanism in agriculture – synthesis report *(2024). [accessed 20 Jan 2026].*
57 *Oxfam,* Emerging good practices on embedding human rights into seafood procurement *(2025). [accessed 20 Jan 2026].*
58 *ETI, Purchasing practices, supplier grievances, and accountability in Bangladesh and Southern India's apparel sector (2026). Available from: URL [accessed DATE].*
59 *ILO, Turning principles into pathways:* The future of the Seafood Good Labour Practices programme *(2022). [accessed 20 Jan 2026].*
60 *ITUC,* ITUC legal guide for setting up an operational-level grievance mechanism for the world of work in the context of business and human rights *(2022). [accessed 20 Jan 2026].*
61 *Danish Institute for Human Rights,* Welcome and introduction: human rights impact assessment guidance and toolbox *(2020). [accessed 20 Jan 2026].*
62 *Danish Institute for Human Rights, Human rights impact assessment guidance and toolbox.*
63 *Impactt, Human rights impact assessment of Tesco's shrimp supply chain in Vietnam (2021). [accessed 20 Jan 2026].*
64 *Impactt, Human rights impact assessment Vietnam prawn supply chain: public report.*
65 *ELEVATE, Human rights impact assessment: farmed shrimp in India.*
66 *L Hayman & I Lorenzoni,* Emerging good practices on embedding human rights into seafood procurement *(Oxfam, 2025). [accessed 20 Jan 2026].*
67 *ETI,* Common Framework for Responsible Purchasing Practices in Food *(2024). [accessed 20 Jan 2026].*
68 *ITC, Trade Map: HS 030617.*
69 *ITC, Trade Map: HS 160521 and HS 160529.*
70 *ITC, Trade Map: HS 160521 and HS 160529.*
71 *R Watson,* Total seafood in multiple retail 2025: a market insight analysis *(Seafish, 2025).*
72 *ITC, Trade Map: HS030617.*
73 *ITC, Trade Map: HS160521 and HS160529.*
74 *M Anner,* Leveraging desperation: *apparel brands' purchasing practices during Covid-19 (Center for Global Workers' Rights, PennState, 2020). [accessed 20 Jan 2026]; M Anner,* Squeezing workers' rights in global supply chains: *purchasing practices in the Bangladesh garment export sector in comparative perspective, Review of International Political Economy, Volume 27, Number 2 (Taylor & Francis, 2020). [accessed 20 Jan 2026]; ILO,* Purchasing practices and working conditions in global supply chains: global survey results, *INWORK Issue Brief No. 10 (2017). [accessed 20 Jan 2026]; MA Islam et al,* Impact of global clothing retailers' unfair practices on Bangladeshi suppliers during Covid-19 *(University of Aberdeen Business School, Centre for Global Development & Transform Trade, 2023). [accessed 20 Jan 2026].*
75 *Sustainability Incubator, When more means less.*
76 *Sustainability Incubator, When more means less.*
77 *CAL, Hidden harvest; IOM, In the shadow of the ships Indonesia; Stride, Precarity and the pandemic; Sustainability Incubator, When more means less.*
78 *Sustainability Incubator, Laboring for less so supermarkets profit more.*
79 *Sustainability Incubator, Laboring for less so supermarkets profit more.*
80 *ITC, Trade Map: HS 230120.*
81 *Sustainability Incubator, Laboring for less so supermarkets profit more.*
82 *D Jory,* Annual farmed shrimp production survey: *a slight decrease in production reduction in 2023 with hopes for renewed growth in 2024 (Global Seafood Alliance, 2023). [accessed 4 Jan 2026].*
83 *Sustainability Incubator, When more means less.*
84 *ILO, Purchasing practices and working conditions in global supply chains.*
85 *Sustainability Incubator, When more means less.*
86 *Praxis Labs,* Tracking progress: assessing business responses to forced labour and human trafficking in the Thai seafood industry *(2019). [accessed 20 Jan 2026].*
87 *Islam et al, Impact of global clothing retailers' unfair practices on Bangladeshi suppliers.*
88 *Islam et al, Impact of global clothing retailers' unfair practices on Bangladeshi suppliers.*
89 *Reuters, Ecuador raises monthly minimum wage to $460 for 2024 (15 Dec 2023). [accessed 20 Jan 2026].*
90 *Indian Ministry of Labour and Employment,* Central government increases minimum wage rates for workers *(26 Sep 2024). [accessed 20 Jan 2026].*
91 *Government of the Socialist Republic of Vietnam, 74/2004 ND-CP:* decree prescribing minimum wage levels applicable to employees working under labor contracts *(30 June 2024). [accessed 20 Jan 2026].*
92 *P Saibua & N Nakhwan,* New minimum daily wage rates in Thailand for 2025 *(GENIE, 10 Jan 2025). [accessed 20 Jan 2026].*
93 *Better Buying, Better Buying Purchasing Practices Index (BBPPI) report, 2025: purchasing practices performance in apparel, footwear, and household textile supply chains (2025). [accessed 20 Jan 2026].*
94 *Better Buying, BBPPI 2025, p32.*
95 *ILO, Purchasing practices and working conditions in global supply chains.*
96 *ILO, Purchasing practices and working conditions in global supply chains.*
97 *IOM, In the shadow of the ships: Indonesia; IOM, In the shadow of the ships: Thailand; K Milward,* Ship to shore rights South East Asia: gender equality and women's empowerment strategy *(ILO, 2022). [accessed 20 Jan 2026].*
98 *IOM, In the shadow of the ships: Indonesia; IOM, In the shadow of the ships: Thailand.*
99 *A Kritzinger, S Barrientos & H Rossouw,* Global production and flexible employment in South African horticulture: experiences of contract workers in fruit exports, *Sociologia Ruralis, Volume 44, Number 1 (Wiley, 2004). [accessed 20 Jan 2026]; J Reinecke et al,* Business models and labour standards: making the connection *(ETI, 2019). [accessed 20 Jan 2026].*
100 *ILO, Purchasing practices and working conditions in global supply chains.*
101 *Sustainability Incubator, Laboring for less so supermarkets profit more.*
102 Sustainable Terms of Trade Initiative, White paper on the definition and application of commercial compliance *(2024). [accessed 20 Jan 2026].*
103 Responsible Contracting Project, Supplier model clauses *(SMCs) 1.0 framing memo (nd), p5. [accessed 20 Jan 2026].*
104 *S Barraclough & A Finger-Stich,* Some ecological and social implications of commercial shrimp farming in Asia *(United Nations Research Institute for Social Development, 1996). [accessed 20 Jan 2026].*
105 *ILO, Turning principles into pathways; H Packer et al, Corporate social responsibility (CSR)* practices of the largest seafood suppliers in the wild capture fisheries sector: from vision to action, *Sustainability, Volume 11, Number 8 (MDPI, 2019). [accessed 20 Jan 2026].*
106 *ILO, Turning principles into pathways.*
107 *ITC, Trade Map: HS160521.*
108 *European Commission,* Corporate sustainability due diligence *(nd). [accessed 20 Jan 2026].*
109 *European Commission,* The forced labour regulation *(nd).*

For human rights, for better business

Ethical Trading Initiative

ETI is a leading alliance of trade unions, NGOs, and companies, working together to advance human rights in global supply chains.

Our vision is a world of work where everyone's human rights are protected and respected.

Ethical Trading Initiative
LHBO4 Kennington Business Park
1-3 Brixton Rd, London SW9 6DE
United Kingdom

+44 (0)20 7841 4350

ethicaltrade.org

info@eti.org.uk

LinkedIn