



Fish

Summary of Key Trafficking in Persons Risk Factors in Fish Production

- ✓ Undesirable and Hazardous Work
- ✓ Vulnerable Workforce
 - Child Labor
 - Migrant Labor
- ✓ Presence of Labor Intermediaries
- ✓ Associated Contextual Factors Contributing to TIP Vulnerability
 - Association with Environmental Degradation
 - Association with Organized Crime/Armed Conflict

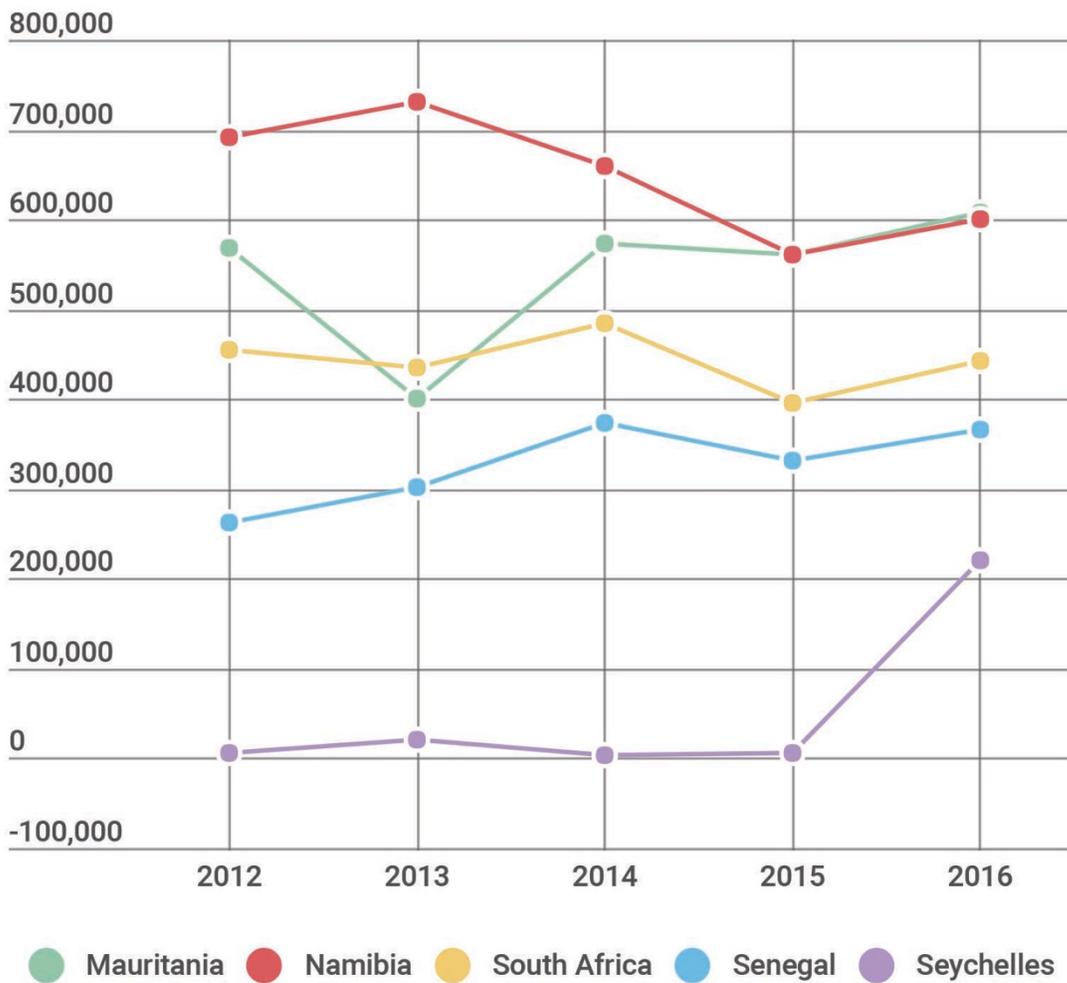
Overview of Fish Production in sub-Saharan Africa

Trade

The top exporters of fish and mollusks from sub-Saharan Africa by value in 2016 were Mauritania, Namibia, South Africa, Seychelles, Senegal and Tanzania.



Top Exporters of Fish and Molluscs (Value USD/Thousands)



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The top importers of seafood from sub-Saharan Africa are Spain, Italy, Japan, Portugal, the Netherlands, and France.²



Features of Production and Supply Chain

Artisanal and industrial marine fishing, as well as inland fishing and aquaculture, are present in sub-Saharan-Africa.³ South and West Africa are home to fish processing industries to support the industrial fishing sectors.⁴ Most fish and seafood products exported from Africa are frozen and minimally processed, although there has been some growth in the seafood processing sector, primarily driven by Chinese company investment. Mauritius, which already has a thriving manufacturing sector, has at least 20 fish meal factories, 50 percent of which are reportedly Chinese-owned.⁵

In West Africa alone, the marine fisheries sector contributes an estimated 10-30 percent of GDP for countries including Mauritania, Senegal, Guinea-Bissau and Sierra Leone. Over three million people are employed in the sector, and fish protein provides over half of nutritional protein requirements for a sizeable percentage of the population.⁶

West Africa is home to bio-diverse and high value species including shrimp, grouper, anchovies, mackerel, and shad, as well as migratory tuna in deep water.⁷ There are significant tuna fisheries in the South Indian Ocean in East African off-shore waters. Nile perch is the primary fish traded from inland fishing on Lake Victoria. A variety of fish are caught in Lake Volta in Ghana, including catfish, carp and Nile perch.⁸ However, much of the fish exported to U.S. and Europe from West Africa is bycatch or so-called trashfish that is ultimately used for animal feed.⁹

In the industrial fisheries sector, which is predominantly for export, vessels are both local and foreign based. Types of industrial vessels include trawlers, purse-seiners, shrimpers, and pole and line tuna boats. Foreign industrial vessels from Japan, South Korea, Russia, Spain, France, Italy and China are all active, with China being the largest foreign fleet operating in the region.¹⁰

The introduction of foreign fishing vessels is having a large impact on West African fish stocks, depriving regional governments of over two billion dollars in revenue. A GreenPeace study of illegal, unreported, and unregulated (IUU) fishing in the region found serious ongoing governance issues of West African fisheries, including a lack of transparency in fishing access agreements with foreign fishing companies; a lack of alignment in national legislation; inadequate implementation of policies; and weak monitoring and surveillance systems.¹¹

A lack of sufficient onshore processing sites is a problem pervasive for all of the top exporters of seafood in sub-Saharan Africa. For example, only a third of fish caught in Senegalese waters is processed domestically. The supply of fish available for domestic processing has declined with the introduction of foreign owned fishing vessels in Senegal's waters.¹²

Selling access to fisheries is a source of income for African governments, although some foreign vessels operate illegally.¹³ A hybrid model is that of "joint ventures," in which foreign companies work with a local company to gain access to the coastal state's vessel flag, thus allowing them increased access and/or looser restrictions on catch.¹⁴



South Africa is an outlier in the African fish processing industry. Most fish processing occurs on the west and south-west coasts of the country, where abalone, crayfish, whitefish, and canning and fishmeal are processed.¹⁵ Companies must have an invitation from the government and a specific permit in order to onshore fish processing in South Africa.¹⁶ Most companies that catch seafood also process it onshore, and have developed cold storage and distribution systems. There are 40 wholesale distributors of domestically processed seafood in South Africa.¹⁷ Namibia also has large scale processing, and foreign fishing ventures are required to process fish in Namibia. Ninety percent of fish processed in Namibia is exported.¹⁸

Key Documented Trafficking in Persons Risk Factors in Fish Production

According to the U.S. Department of State 2016 *Trafficking in Persons Report*, forced labor or forced child labor is reported in the fishing/seafood sector in the following African countries: Burundi, Cameroon, Comoros, Republic of the Congo, Gabon, Ghana, Kenya, Madagascar, Mauritius, Namibia, Seychelles, Sierra Leone, South Africa, Tanzania, and Uganda.¹⁹

Undesirable and Hazardous Work

The ILO identifies fishing as a highly hazardous sector. Fishers routinely face hazards and dangerous conditions of work including rough weather, exposure to sun and salt water without protective clothing, slippery/moving work surfaces, regular use of knives/other sharp objects, inadequate sleeping quarters, inadequate sanitation, and lack of fresh food/water. In addition, the work itself is highly labor intensive. When setting nets or hauling a catch, workers may be required to work around the clock for days without breaks. Workers report high degrees of fatigue, which further increases the risk of accidents. In informal fishing, children are involved in diving for fish, because they are believed to have stronger lungs. These children may dive without any protective gear, putting them at high risk for injury or death. Fish processing, which can take place on board larger vessels or in port cities, carries its own risks. For example, workers who pack fish on ice often report frost bite symptoms in fingers. Few workers are provided adequate health and safety gear. When injuries and illness do occur, medical care is rarely provided. Due to the highly hazardous nature of the work, fishing is generally considered a worst form of child labor.²⁰

Workers aboard fishing vessels are inherently isolated, particularly on larger vessels that can stay at sea for extended periods of time, leaving workers with limited means of escape or avenues to report abuse. Fishing operations take place across national and maritime boundaries, leaving workers under the legal jurisdiction of the country in which the vessel is flagged. In cases where the vessel is using a flag of convenience, workers have severely limited legal protection.²¹



Vulnerable Workforce

Child Labor

The U.S. Department of Labor’s 2016 *List of Goods Produced by Child Labor or Forced Labor* notes that fish/seafood products are produced with child labor in Ghana, Kenya, Tanzania, and Uganda.²²

The most well documented case study of child labor in African fisheries is that of the Lake Volta region in Ghana. The typical trafficking mechanism is a contractual agreement between the children’s parents and a recruiter, often for a multi-year period, with the parents given an advance payment or promised payment at the end of the contract. In many cases, both the parents and children lack awareness of the actual conditions, which are often abusive.²³ About 75 percent of Ghana’s fish production is consumed domestically, so most fish from the Lake Volta region do not enter export supply chains.²⁴

Children are also trafficked in the fishing sector on Lake Victoria. Nile Perch from Lake Victoria are exported to European and Asian markets.²⁵ In one study, children working on Lake Victoria reported widespread abuse and harassment, as well as withholding of wages.²⁶ The presence of labor recruiters and deceptive recruitment practices have also been documented.²⁷

Migrant Labor

The high numbers of foreign fishing vessels operating in African waters has been well documented, but data on the demographics of crew members is harder to come by. Anecdotally, it appears that in many cases, both workers from the vessel’s port-of-origin country, as well as local workers from African nations, may be present. For example, Senegalese workers were documented to be working alongside Chinese workers on a Chinese trawler off the coast of Senegal.²⁸ While salaries are reportedly relatively high, the lack of oversight into conditions on these vessels, particularly when they are operating illegally, may leave both local and foreign workers vulnerable to abuse.

In 2010, the Environmental Justice Foundation documented South Korean, Chinese, Vietnamese, Indonesian and Sierra Leonean workers experiencing indicators of forced labor on board a Korean flagged ship operating off of Sierra Leone. Sierra Leonean workers reported that they were not given contracts and were not paid in cash, but instead were compensated in bycatch that they could sell in markets. They reported that any expression of grievances could result in termination and even abandonment.²⁹

Serious abuses of workers from Southeast Asian countries – Cambodia in particular – have been documented on Thai vessels operating in Indian Ocean waters between Mauritius and Seychelles. The lack of adequate government patrol in the area appeals to “reefer” vessels that may stay in the area for up to 18 months, relying on transshipment for supplies and to offload their catch.³⁰ Trafficked Cambodian workers have also been documented on Taiwanese vessels off the coast of Senegal.³¹



Presence of Labor Intermediaries

A 2016 Greenpeace report documented how Cambodian workers were charged high fees by recruiters and given advances to induce indebtedness. The workers lacked any written employment arrangement but, in some cases, were verbally promised a lump sum of earnings after working for a two-year period. Workers were subject to extreme abuse and health and safety hazards while on board.³²

EJF reported that Chinese and Vietnamese workers had also been recruited by labor brokers in their home countries.³³ There was a documented case of forced labor on tuna fishing vessels in South African waters where the crew – mainly Indonesian and Taiwanese – worked for between three and five years without being paid.³⁴ In another case, Cambodian workers were hired by a labor recruiter and were exploited on foreign fishing vessels off the coast of South Africa.³⁵

In 2013, there was widespread media coverage of a Chinese-owned commercial vessel, MV Leader, which exploited Namibian, Indonesian, and Chinese workers in Namibian waters.³⁶ Media articles noted that workers on MV Leader had been recruited via “labour hire.”³⁷ One potential root cause of this exploitation is, interestingly, the same policies to prevent IUU fishing that have been heralded as a success story in Namibia, where the government requires foreign companies to pay high fees to obtain fishing rights. Some analysts have suggested that these fees may incentivize companies to seek savings through low cost or exploited labor.³⁸

Although recruitment mechanisms for Chinese workers on foreign vessels have not been well documented, given the proliferation of Chinese vessels operating both legally and illegally in African waters,³⁹ these anecdotal reports suggest the potential of more widespread vulnerability.

Contextual Factors Contributing to Trafficking in Persons Vulnerability

Association with Environmental Degradation

Illegal, unregulated and unreported (IUU) fishing is a well-documented issue in African marine fisheries, so much so that approximately 40 percent of the catch in West Africa is estimated to be unreported, and about 50 percent of fishery resources are overfished.⁴⁰ Although exact numbers are unknown due to the nature of the problem, in 2013, the Environmental Justice Foundation stated that “West African waters are estimated to have the highest levels of IUU fishing in the world, representing up to 37 percent of the region’s catch.”⁴¹ Transshipment and the use of reefers is central to many illegal fishing practices, allowing fishing vessels to remain at sea for long periods of time and without port state oversight. An estimated 16 percent of West African fish exports are harvested by vessels that use transshipment.⁴²



Overfishing contributes to livelihood disruptions among artisanal fishermen, and contributes to food insecurity and malnutrition; fish accounts for up to 50 percent of dietary protein in many African countries.⁴³

Association with Organized Crime/Armed Conflict

IUU fishing has been linked to other forms of organized crime. IUU fishing vessels have also been associated with drug trafficking, child labor, and tax evasion. The lack of regulatory infrastructure in the West African fishing industry allows IUU fishing and associated risks to thrive with little interference.⁴⁴

International fishing shipments have also provided a convenient channel for illegal drug trafficking schemes. An increased demand for cocaine in Europe has driven Latin American drug smugglers to utilize West Africa as a port of exit for the drug. The United Nations Office for Drugs and Crime (UNODC) reported that “mother ships” transport cocaine from Latin America to West Africa, where the drug is placed on inconspicuous local fishing vessels. These ships are generally manned by an African crew, but carry a Latin American “controller” on board. The vessels then transport cocaine to Europe.⁴⁵

IUU fishing in Somalia has been reported to be a source of income for the terrorist group al-Shabab, and pirates sometimes associated with the terrorist organization have turned to providing security for illegal foreign vessels to generate income, often firing on unprotected Somali fishermen who are seen as competition.⁴⁶



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Note that this includes workers in forced labor or found to be in conditions of forced labor in recent years both in vessels leaving or docking in a country's ports or active in a country's territorial waters.

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