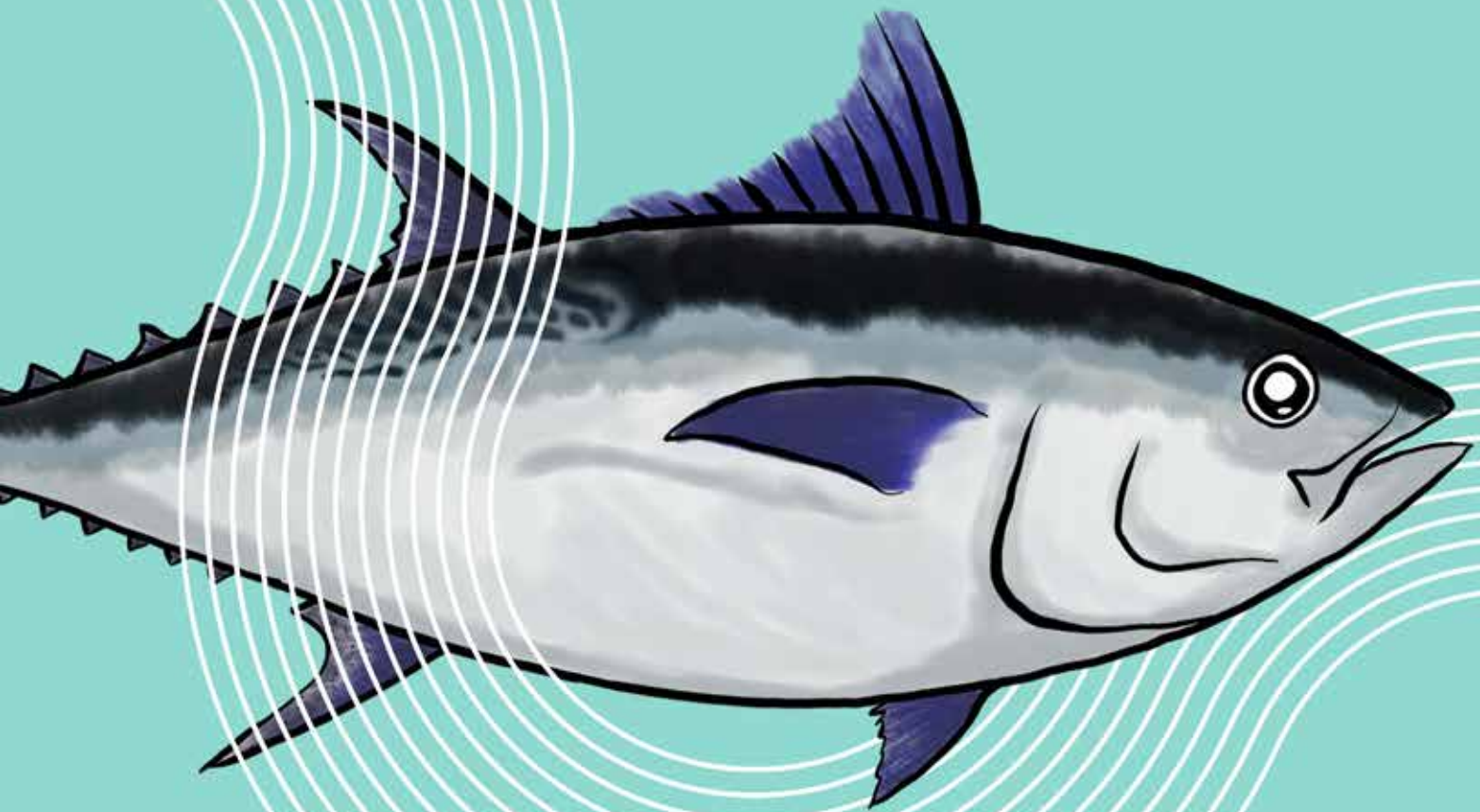


2020 EDITION
SOUTHEAST ASIA CANNED TUNA RANKING

SUSTAINABILITY
AND JUSTICE
ON THE HIGH SEAS



GREENPEACE



ACKNOWLEDGEMENTS

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EXECUTIVE SUMMARY

In the fourth edition of Greenpeace Southeast Asia’s Tuna Cannery Ranking, we evaluated nine canned tuna brands in Thailand, five tuna canneries in Indonesia, and six tuna canneries in the Philippines. In a span of five years, considerable progress has been made by these companies in working towards a more traceable and sustainable sourcing of tuna.

However, measures towards a worker-friendly canned tuna industry that is free of abuse are in desperate need of verifiable time-bound commitments. An intolerably high number of documented incidents of labor abuse continue to plague Southeast Asia’s tuna industry¹ and the East Asian tuna fisheries² that supply many of Southeast Asia’s tuna canneries. This has forced Greenpeace to reassess how it fits human rights and labor issues into the existing scoring framework, to ensure that both labor abuse and environmental sustainability are given a fair accounting (see more in Methodology).

As with prior reports, Greenpeace Southeast Asia laments the continued “double standard” that exists wherein responsibly-sourced and highly traceable tuna from the Southeast Asia region is typically more accessible to customers in North America or Europe than to customers based right here in the region. Nowhere is this more evident than with Thai tuna brands; many consumer-facing brands profiled in this report are owned by parent companies that source the lion’s share of the tuna for foreign tuna brands (often with higher standards).

Globally, tuna stocks continue to experience intense pressure from destructive fishing practices, overfishing, and Illegal, Unreported and Unregulated fishing (IUU). Modern slavery at sea and other egregious human rights abuses are rampant in distant water fishing fleets found in every part of the world. Notably, having supplier codes of conduct and protective language in company policies that address labor are not enough, nor are “desktop-level” third party audits. **Companies must perform due diligence on human rights and sustainability beyond what is necessary in other sectors, because tuna fishing remains an exceptionally high risk industry.** Representative worker organizations and labor unions provide the strongest protections to workers and companies should create enabling conditions for fishers, especially migrant fishers, to form and lead their own unions. To ensure effective due diligence, companies should inform their mitigation measures and remediation based on robust engagement with these groups. Also, on-the-water audits and anonymous, widely available whistleblower tools (such as easily-accessible worker hotlines) as part of effective non-judicial grievance mechanisms can also root out any possible environmental violations and labor abuse in the supply chain.

KEY FINDINGS

As in prior rankings, Greenpeace uses a seven point criteria to rate companies on their tuna sourcing practices. Each criterion is given weight indicating relevant importance. The criteria include:

- Sustainability (20%)
- Legality (20%)
- Sourcing Policy (20%)
- Traceability (15%)
- Driving Change (10%)
- Transparency and Customer Information (10%)
- Equity (5%)

Their scores in each of these seven categories are then calculated to establish an overall rating, which is either Good (green, 70-100%), Fair (yellow, 40-69%), or Poor (red, 0-39%). This year, a total of 17 companies participated in the Greenpeace-provided survey, and 3 non-participating companies were scored based on publicly available information.

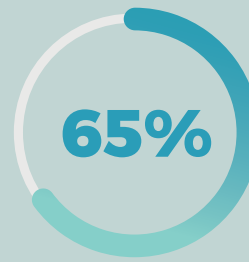
Companies with an overall Good (green) rating are **P.T. Citraraja Ampat Canning** (Indonesia), **Super C Chef** (Thailand), **Alliance Select Foods International** (Philippines) and **P.T. Samudra Mandiri Sentosa** (Indonesia).

The top performers for **Traceability** with scores ranging from 90 - 100% are **Super C Chef**, **Aro**, and **Nautilus** from Thailand, **General Tuna Corp.**, **Ocean Canning Corp.**, **Seatrade Canning Corp.** from the Philippines, and **PT. Citraraja Ampat Canning** from Indonesia.

For **Sustainability of current sourcing**, the top companies with scores ranging from 90 - 100% are **Aro** from Thailand, **Alliance Select Foods International** from the Philippines, and **PT. Citraraja Ampat Canning**, **Samudra Mandiri Sentosa**, **PT. Deho Canning Co.**, and **PT. Sinar Pure Foods International** from Indonesia.

Only one company, **Alliance Select Foods International**, is in the green zone for **Legality and Labor**. For this criteria, we asked brands and canneries questions relating to elimination of forced labor at sea. See right infographic.

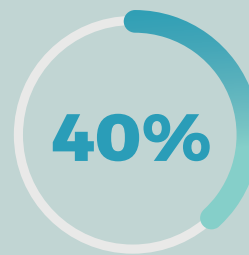
For the **Equity** criteria, only three companies from the Philippines had a green score: **Alliance Select Foods International**, **General Tuna Corp.**, and **Celebes Canning Corp.**



13 of the 20 companies publicly support the ILO C-188⁵ by supporting advocacy efforts and its full implementation.



11 of the 20 companies have established measures for the early detection and prevention of modern slavery at sea.



8 of the 20 companies refuse to source tuna from vessels that collect guarantee deposits from its crew.



7 of the 20 companies require fishing crew manifests.



A paltry 4 of the 20 companies have whistleblower and anonymous hotlines or email where affected migrant fishers can file complaints. It remains unclear how many people file complaints or whether these complaints are fairly resolved.

In the **Sourcing Policy** category, companies can learn from the examples set by **PT. Samudra Mandiri Sentosa** and **PT. Citraraja Ampat Canning** from Indonesia.

In the **Transparency and Customer Information** category, the top performers with green scores are **Super C Chef** and **Tops** from Thailand.

In the **Driving Change** category, more progressive and proactive work is desperately needed, as no company has yet reached the green mark.

In general, most of the companies sourcing from purse seiners are shifting procurement to require their tuna to come from FAD-free purse seine operations, or from handline and pole and line fishing, which are more sustainable. Nine companies source from pole and line vessels, while another twelve source from FAD-free fishing vessels. Only six companies source handline-caught tuna. Fourteen companies are still procuring from purse seine fishing vessels with no FAD-free requirements, and one company is sourcing from longline.

In terms of species procured, twenty companies source skipjack, sixteen companies source yellowfin, five source bigeye, three companies source tonggol, and four companies source albacore.

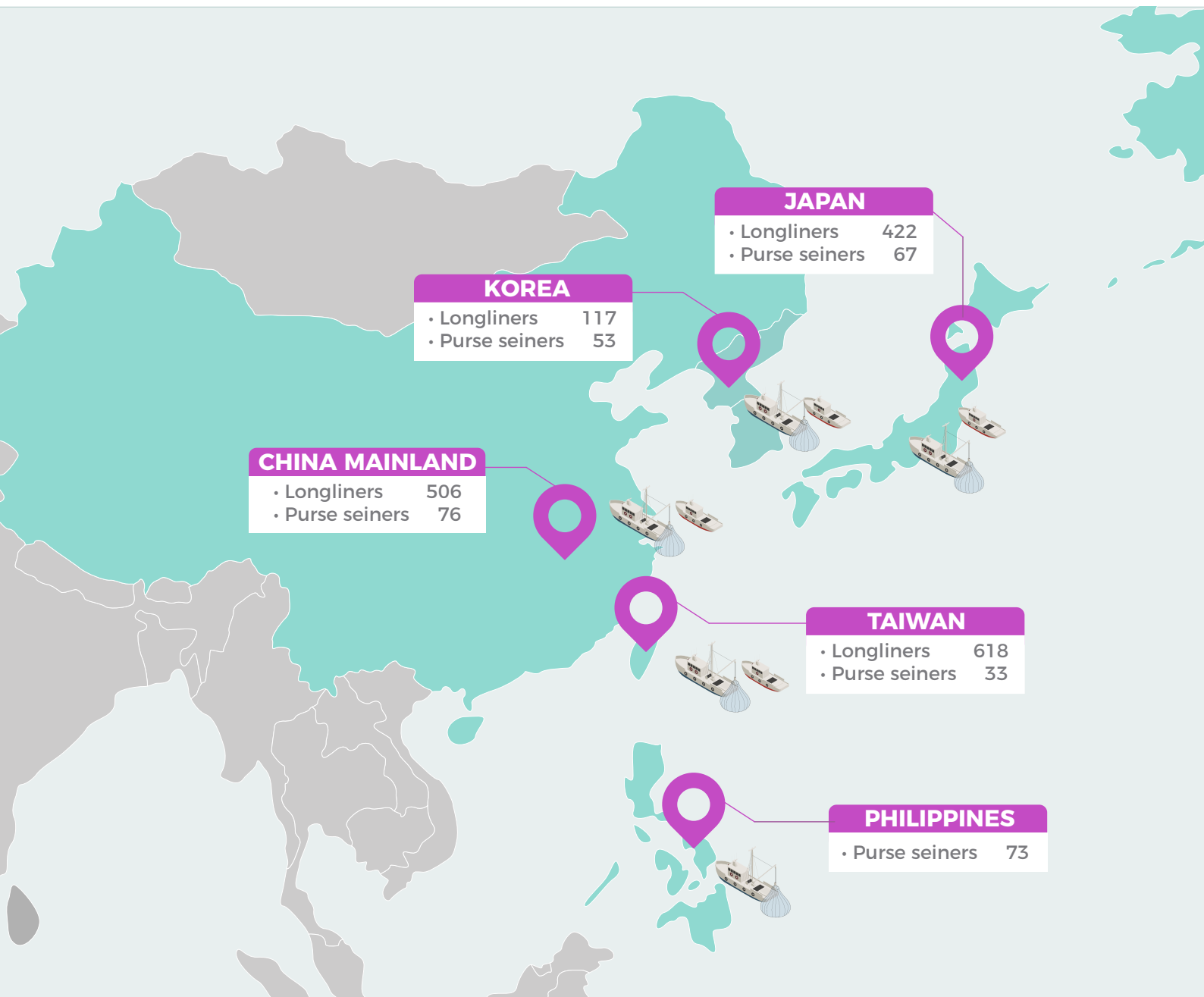
However, some companies are also procuring from Taiwanese longline fishing vessels where some fishing fleets have been involved in forced labor at sea. Companies are urged to take swift action to review and reform their supply chains, as one case of human rights abuse on any fishing vessel is one too many.






INTRODUCTION

Tuna is among the most economically valuable fish in the world as well as an important predator species in marine ecosystems.⁴ The tuna industry provides tens of thousands of jobs in the catching, processing, and trading sector worldwide, including in many developing coastal states, and generates significant revenues in terms of fishing access fees. All told, it generates \$42 billion, with 65.67% coming from the Pacific Ocean,⁵ and about \$5 billion from pole and line fishing alone.⁶ According to FAO, the total production of tuna increased from 6.658 million metric tons (mmt) in 2017 to 6.841 mmt in 2018.⁷ In 2018, total export value of fresh, frozen, chilled and processed tuna was USD 12.42 billion, with canned tuna products worth USD 7.779 billion.⁸




LONGLINE AND PURSE SEINE IN WESTERN CENTRAL PACIFIC OCEAN

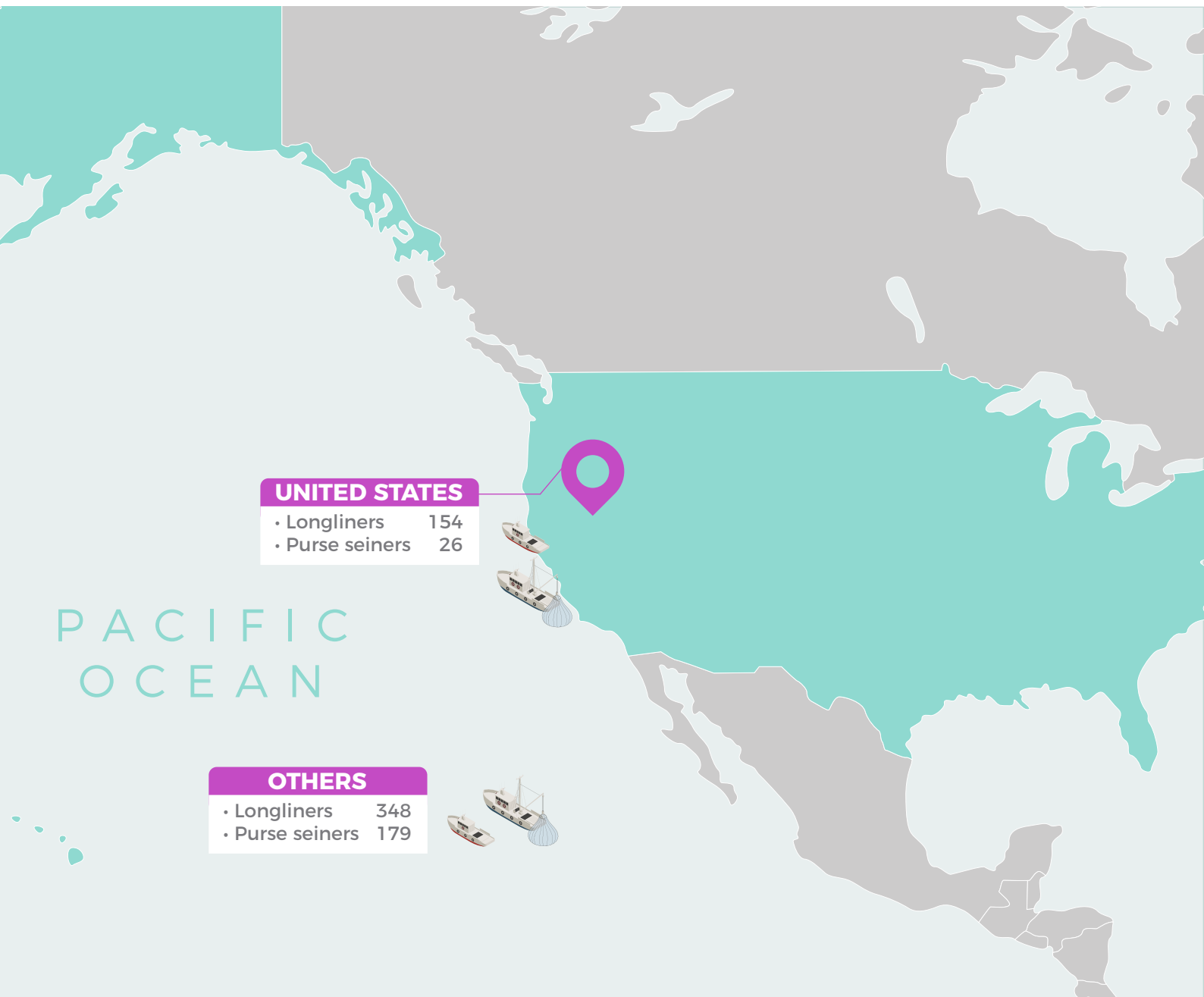
**TOTAL
LONGLINERS**
2,165



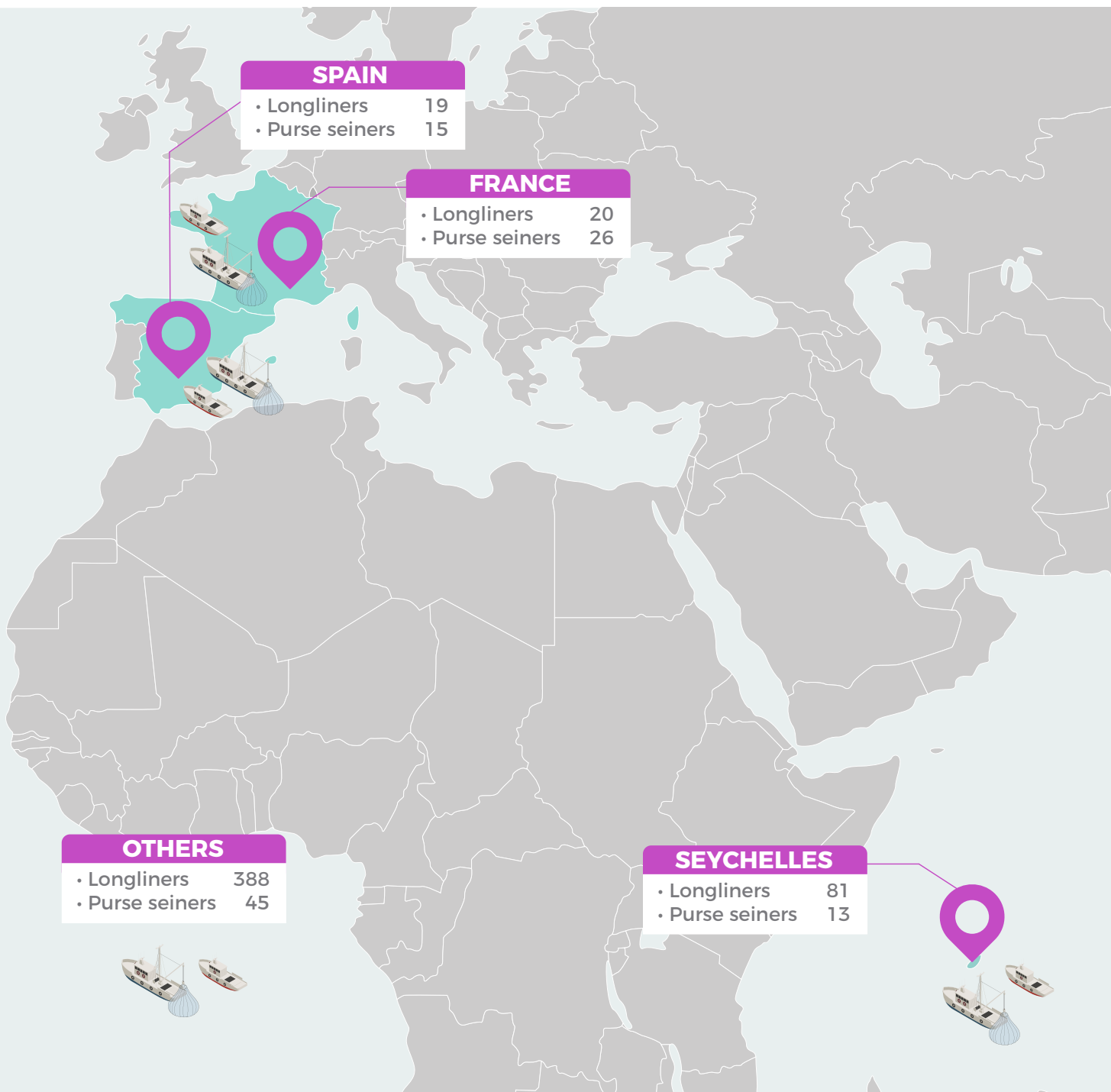
**TOTAL
PURSE SEINERS**
481



Source: WCPFC as of 5 June 2020



Thailand is still the top tuna exporting country in Southeast Asia in 2018, exporting USD 2.256 billion worth of processed tuna. Indonesia, Philippines, and Vietnam are also among the top 10 exporters of processed canned tuna. These four countries combined made up USD 3.245 billion, or 42% of all canned tuna exports in 2018. The top 10 importers of processed canned tuna are the United States of America, Italy, Spain, France, United Kingdom, Germany, Japan, Australia, Netherlands, and Saudi Arabia.⁹ These ten countries combined made up 64% of the total USD 8.28 billion worth of processed tuna imports in 2018.



LONGLINE AND PURSE SEINE IN INDIAN OCEAN

TOTAL LONGLINERS

including Taiwan



1,385

TOTAL PURSE SEINERS



251

Source: IOTC as of 5 June 2020

Based on TW Fisheries Agency, as TW vessels are not included in the IOTC fishing vessel record



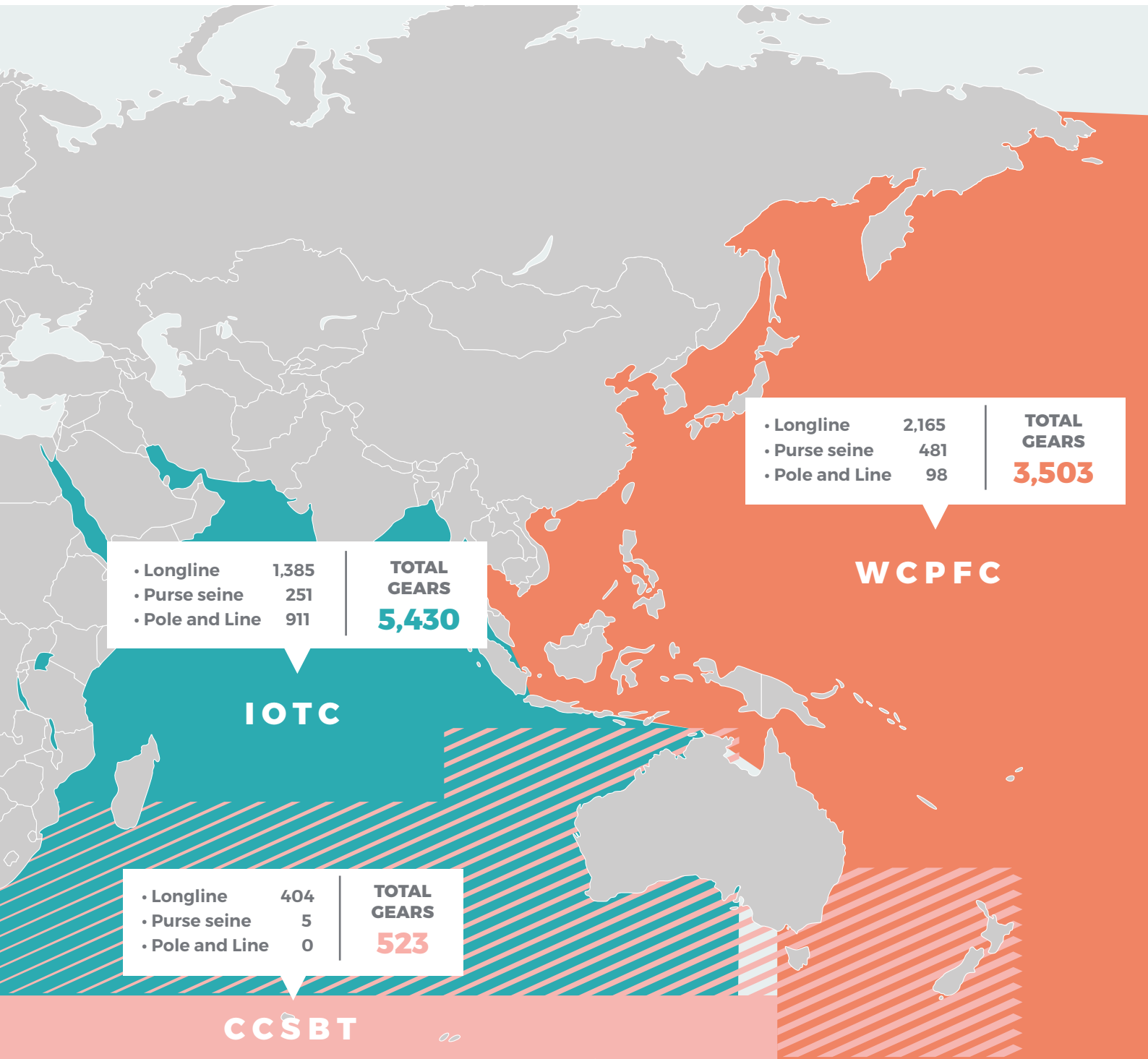
IOTC: Indian Ocean Tuna Commission

WCPFC: Western and Central Pacific Fisheries Commission

IATTC: Inter American Tropical Tuna Commission

ICCAT: International Commission for the Conservation of Atlantic Tunas

CCSBT: Commission for The Conservation of Southern Bluefin Tuna



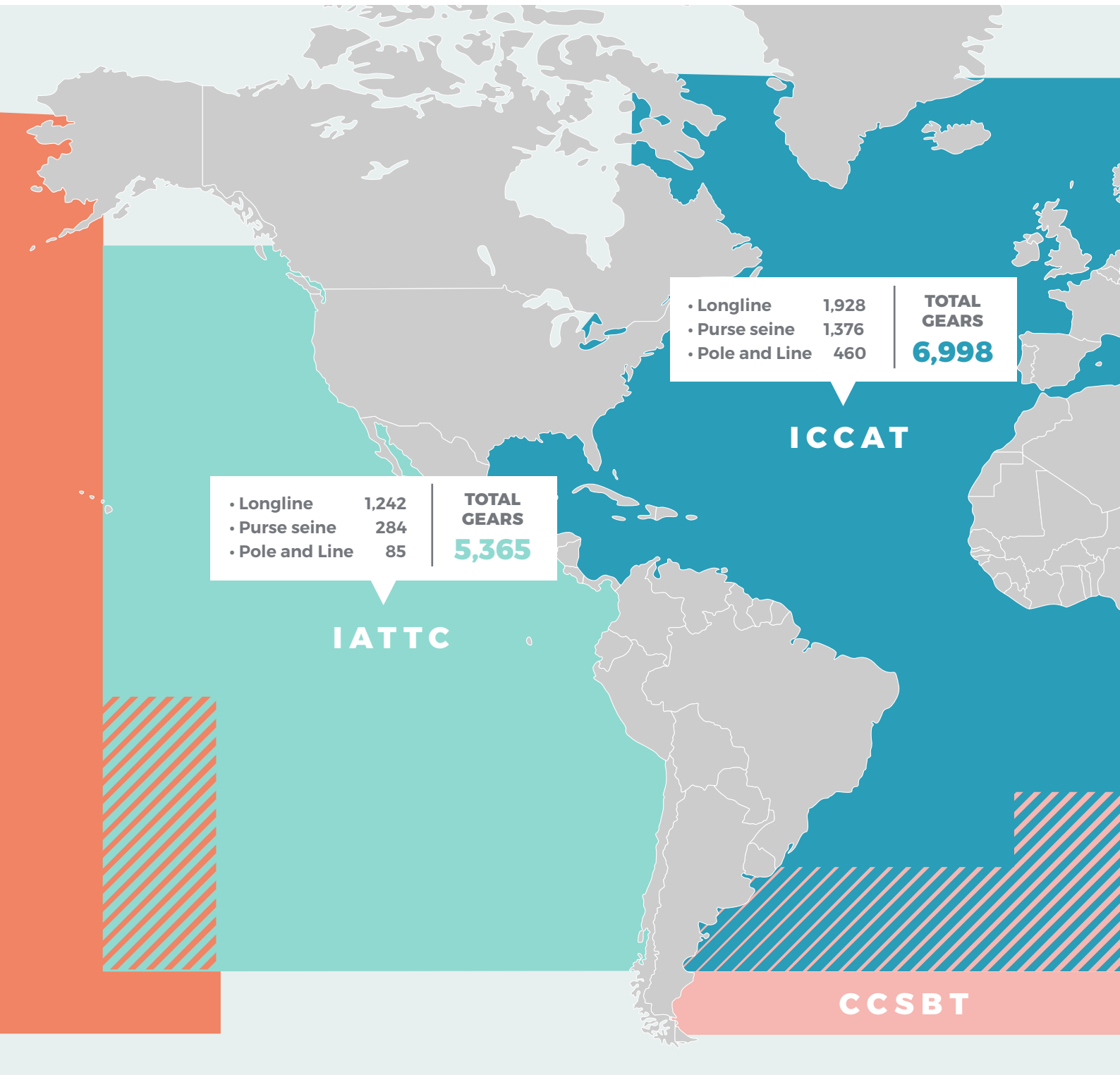
**TOTAL
LONGLINE**
7,124

**TOTAL
PURSE SEINE**
2,397

**TOTAL
POLE AND LINE**
1,554

**TOTAL
GEAR**
21,819

Source: Various RFMO database as of 12 June 2020



FORCED LABOR AND HUMAN RIGHTS ABUSES IN GLOBAL TUNA AND SEAFOOD INDUSTRIES



As documented in the December 2019 Greenpeace Southeast Asia report *Seabound*, when companies prioritize profit above all other considerations, this can spur operators to exploit workers during fishing operations and in the recruitment process. Overexploitation of coastal water resources and dwindling fish populations incentivize company decision-makers to focus on increasing “fishing effort” on the high seas, which costs more. These higher operating costs and nearly non-existent enforcement significantly increase the odds that migrant fishers will be exploited.¹¹ Simply put, forced labor reduces fishing costs.¹² Workers are largely recruited by manning agencies in developing countries, where they may be made false promises of compensation. There are also many cases of migrants being robbed of their documents, and sold into conditions that constitute slavery.¹³ Indeed, in the *Seabound* report, Greenpeace Southeast Asia partnered with SBMI (Indonesian Migrant Workers Union) to document 13 suspected foreign fishing vessels where 34 Indonesian migrant fishers reported conditions suggesting either forced labor or other serious human rights abuse.¹⁴

Several recent investigations have gathered evidence of a myriad of abuses to Southeast Asian workers on Southeast Asian and East Asian fleets,¹⁵ from the 2019 *Human Rights at Sea* report on the Taiwanese distant water fishing (DWF) fleet,¹⁶ the 2019 Environmental Justice Foundation study detailing IUU fishing and child labor in the Vietnamese fishing fleet,¹⁷ and the 2019 Praxis report that studied the Thai seafood industry.¹⁸ After having conducted several hundreds of interviews ranging from representatives of the private sector, government, CSOs, and foreign migrant workers, the Praxis report concluded:

“Despite publicly committing to change in Thailand, the business model remains unchanged. Few seafood buyers are building social and environmental compliance into the buying price of an order, which undermines efforts to promote labour rights.”¹⁹

An International Labour Organization report from this year, entitled *Endline research findings on fishers and seafood workers in Thailand*, tracked progress made over the past few years by the Thai government.²⁰ While reforms have been made, such as the country’s ratification of the ILO Work in Fishing Convention (No. 188) and the Protocol of 2014 to the Forced Labour Convention (P029), as well as training labor inspectors in the country, the situation remains highly problematic.

The report states that 67% of fishers “lack full control over their ATM cards and hence, pay;” almost half of all workers surveyed “cannot recall signing a work contract;” and that “illegal wage deductions for food and accommodation stand at 16 per cent among fishers surveyed and 18 per cent for seafood workers.”²¹ ILO employed new methodology in the 2020 report to assess the Thai seafood industry’s modern slavery problem, and found that 7% of seafood processing workers and 14% of fishers experienced forced labor.²²

This is highly alarming, as some of the world’s largest tuna companies hail from Thailand, and are featured in this report. This is also a key reason why our methodology was reformed slightly this year, particularly in reference to the legality section. Simply put, commercial tuna fishing remains a high-risk industry, and true due diligence requires that companies go beyond simply having a labor rights policy in place and signed supplier codes of conduct. Indeed, the aforementioned 2019 Praxis report recommended, among other things, that companies in Thailand should develop direct buying relationships with vessel owners,²³ and that “multiple sources of data are required” to “triangulate audit findings,” as “social compliance audits and certifications struggle to sustain oversight and do not properly engage workers.”²⁴ The report advises that companies adopt “worker-driven social responsibility models based on binding agreements with workers’ representatives, to implement worker-led monitoring and enforcement mechanisms that could better guard against labor abuses.”²⁵

An Indonesian-focused study run by universities based in the UK and in Indonesia examined “the labour conditions of fishers and factory workers processing wild catch for export,” in order to provide “evidence-driven recommendations to help brand-owners, buyers and suppliers based in the EU and U.S. to better understand where and how they can address any labour abuse risks within their supply chains in Indonesia.”²⁶ The study

**Unfortunately,
as of May 2020,
“complaints of labour
abuses and slavery on Thai
fishing boats are routinely
going unreported by the
authorities,”
according to a Thomson
Reuters Foundation analysis.²⁸**

**The study found
“a large discrepancy
between the official number
of complaints and those
recorded by four leading
charities that advocate for
fishermen.”²⁹**

**Thai labor officials frequently
preferred to settle cases off
the books instead of logging
official complaints and
that activists believed that
mediation merely encourages
employers to commit
repeated offences and that
fishermen feared retribution
from employers.**

issued a number of recommendations to the Indonesian government based on its findings. A few examples include that the government should require companies to inform crew of their rights under existing legal authority with a written work agreement, protect the right of crew to organize (indeed, some employers have fired all fishers for such attempts), and set up a multi-stakeholder working group to bring all companies into compliance on paying minimum wage and legally required health and life insurance.²⁷



STRATEGIES TO IMPROVE HUMAN RIGHTS STANDARDS IN THE SUPPLY CHAIN

Fortunately, an international response is slowly but surely gathering traction. Two points of intervention can be categorized as (a) a regulatory response and (b) a civil society / technological effort to increase transparency, by (in part) aiding seafood buyers and end customers in finding responsible companies.

A new regulatory landscape is coming, and the following examples are just a few of many. The EU is planning to draft legislation to mandate human rights and environmental due diligence in supply chains.³⁰ Policy makers are exploring how to develop an International Legally Binding Instrument on Transnational Corporations and other Business Enterprises with respect to human rights. In Switzerland, the Responsible Business Initiative is gaining traction; it is an effort to introduce human rights and environmental due diligence obligations into the Swiss Constitution. It is up for a referendum in late 2020, with the support of 78% of voters as well as major Swiss retailers and 90 multinationals.³¹ The UN Food and Agriculture Organization is developing new international guidelines to confront substandard working conditions in the seafood industry.³² And finally, more frequent bilateral trade disruptions are anticipated, a recent example being the U.S. seeking to suspend \$1.3 billion in trade preferences for Thailand, citing a failure to adequately protect workers' freedom of association and right to collective bargaining.³³ In May 2020, the U.S. Customs and Border Protection issued a detention order for all seafood, including tuna, caught by a Taiwanese-flagged fishing vessel for suspected forced labor.³⁴

Civil society organizations have also actively sought to bypass the perceived sluggishness on the part of regulatory bodies by providing analyses and tools to connect buyers with responsible players in the industry and help them to avoid illegally or unethically sourced tuna. One strategy has been to track the movement of fishing vessels on the high seas, and amass all court records and alleged complaints lodged against fishing vessels, whether for environmental or labor-based infractions. Some examples of these organizations include Global Fishing Watch³⁵ (which had recently partnered with Indonesia to display all AIS and VMS vessel tracking data in Indonesian waters – for free);³⁶ Spyglass,³⁷ which relies on the Combined IUU Fishing Vessel List maintained by Trygg Mat Tracking to identify fishing vessels that violate the law;³⁸ and IUU Fishing Index, which benchmarks countries' vulnerability, prevalence and response to IUU fishing, based on 40 criteria.³⁹

A related strategy has been to aid businesses and consumers in identifying leaders and laggards through company rankings. Greenpeace Southeast Asia is the leader in this space in terms of scope and applicability to the Southeast Asian tuna industry, and this is the fourth update of tuna company rankings since 2015. While Thai Union (the largest publicly-held seafood company in the world) and Greenpeace reached an agreement in mid July 2017⁴⁰ in response to the company's poor track record on labor abuses and sustainability, a review into its progress shows how the seafood giant is advancing in some key areas but has work to do in order to fully meet its suite of environmental and human rights commitments to Greenpeace and its customers.⁴¹

Other organizations have sought to present their own rankings. Corporate Human Rights Benchmark ranks global companies⁴² but does not directly

profile or rank any companies directly involved in the tuna trade anywhere in the supply chain, save for a few U.S. and U.K based supermarkets. (For a more direct evaluation of U.S. supermarkets' performance on seafood sustainability, please see Greenpeace USA's Carting Away the Oceans 10 from 2018.)⁴³

The World Benchmarking Alliance created a Seafood Stewardship Index⁴⁴ (SSI) to evaluate 30 major seafood companies according to how well they are meeting the United Nations Sustainable Development Goals (SDGs). Unsurprisingly, it could not identify any industry champions in this space, and simply found their performance ranging between poor and mediocre. (Our rankings in this report found similar levels of performance among the larger tuna companies, though the positive news is that a select group of smaller boutique tuna companies are performing well in the region.) Oxfam's Behind the Barcodes project evaluates U.S. and European supermarkets based on whether workers are exploited in the food supply chain.⁴⁵ Similarly, it found dismal levels of performance among all major brands.

FishChoice has taken an important step forward by issuing a draft social policy⁴⁶ on the protection of human rights in Fishery Improvement Projects (FIPs) listed on FisheryProgress, and is accepting multi-stakeholder feedback on its draft standards as of the writing of this report.⁴⁷ While the draft standards already exceed the Marine Stewardship Council policy on forced labor and child labor, there is still ample room for improvement to ensure businesses sourcing from FIPs comply with international standards and best practice on human and labor rights in fisheries. It is critical that FishChoice strengthen its draft standards based on stakeholder feedback.

TRANSSHIPMENT AT SEA

A common thread woven throughout the tuna industry’s standard practices is the problematic issue of transshipment-at-sea, a method of transferring cargo, humans, or supplies in a way that can evade enforcement and “launder” any illegally caught fish.⁴⁸

Human trafficking, forced labor,⁴⁹ and other human rights abuses can be facilitated by transshipment at sea because it allows fishing boats to stay out at sea for much longer periods of time, and to avoid detection by law enforcement. This decreases the frequency of inspections, contributes to overcapacity by facilitating more time spent fishing, and deprives developing coastal states of much needed revenue from the use of their port infrastructure.

One study⁵⁰ concluded that “a moratorium on transshipment at sea would provide the best ecological and social outcome for high seas fisheries.” It further elaborated that a “total ban on transshipment at sea is a primary way to ensure that human trafficking can be combated alongside preventing the laundering of Illegal, Unreported and Unregulated (IUU) catch.” For these reasons, Greenpeace advocates that at-sea transshipments be phased out urgently and that transshipments be conducted only at port under strict scrutiny.⁵¹





SEAFOOD AND COVID-19

From fishing vessel to processor, the seafood supply chain was already beset with potential forced labor abuses. Now companies and regulatory bodies must contend with significant worker health issues related to the COVID-19 global pandemic. Several coronavirus cases have been reported at seafood processing plants. *Thai Union* reported COVID-19 outbreaks in its plants in Ghana⁵² and Portugal.⁵³ There were also outbreaks involving Chilean salmon processors *Blumar*⁵⁴ and *Camanchaca*,⁵⁵ and a Norwegian salmon group *Leroy Seafood*.⁵⁶ In the United States, there were five companies affected by COVID-19: *High Liner Foods*,⁵⁷ *Trident Seafoods*,⁵⁸ *Ocean Beauty Seafoods*,⁵⁹ *Pacific Seafood*,⁶⁰ *Bornstein Seafoods*,⁶¹ and *Blue Harvest Fisheries*⁶² have all had employees test positive.

Companies should anticipate and plan for an expected increase in COVID-19 cases aboard fishing vessels if they fail to implement effective social distancing measures and provide crew with PPE. The American Seafoods Group reported 86 cases of COVID-19 on board its American Dynasty factory trawler.⁶³ In the Philippines, the number of COVID-19 cases in the province of Negros Oriental jumped from just two to eleven overnight after 170 fishermen returned from a nearby island and at least nine of them tested positive - and all transmissions were found to have occurred on the vessel.⁶⁴ Protocol to prevent and mitigate the

spread of COVID-19 among workers must immediately be in place and enforced for the benefit and safety of all workers in the supply chain. Measures should include social distancing, wearing of face masks, employer-paid testing for all crew before embarking and disembarking from fishing vessels, a mandatory 14-day quarantine (with pay) at port for workers with symptoms or who tested positive, and provisions for disembarking to the nearest port in cases of medical emergency. Oxfam assessed the situation in Thailand and issued several recommendations for seafood companies and vessel owners, including a full training of all staff on COVID-19 prevention measures, providing PPE, helping workers access state benefits, and empowering workers to organize amongst themselves without fear of retaliation.⁶⁵ Oxfam also recommended that companies communicate critical health and prevention information to workers in their own language, provide paid sick leave, and report any positive cases to the relevant governmental authorities.⁶⁶

The Western Central Pacific Fisheries Commission has modified some Conservation Management Measures in response to COVID-19. These include suspension of human observer coverage on purse seine vessels, allowing at sea transshipment for purse seiners under certain conditions, and suspension of at sea transshipment observers under certain conditions. These measures are in effect until July 31, 2020.⁶⁷

ENVIRONMENTAL IMPACTS

As highlighted in prior reports, the global tuna industry continues to wreak havoc on marine ecosystems (including non target fish, sharks, rays, turtles, and birds) and the health and resilience of the targeted tuna stocks as well.

Destructive fishing practices remain the norm, whether they include FAD-caught purse seine or longline-caught; the latter method featuring a higher incidence of slavery and other human rights abuses. Fortunately, some smaller tuna fishing companies are taking responsibility and minimizing the impacts of their resource extraction by fishing more selectively (e.g., pole and line caught tuna). Prior years' versions of this report detail estimated bycatch rates and ecosystem impacts of the most common tuna fishing methods.⁶⁸

Overfishing is brought about by overcapacity - meaning there are too many big boats catching too much fish.⁶⁹ In the high seas, or waters beyond national jurisdiction, only five fishing powers dominate (Mainland China, Spain, Taiwan, Japan and South Korea), accounting for over 85% of observed fishing activity.⁷⁰ Greenpeace and other global organizations are campaigning for the establishment of ocean sanctuaries to encompass 30% of the oceans by 2030 through a UN Oceans Treaty.⁷¹

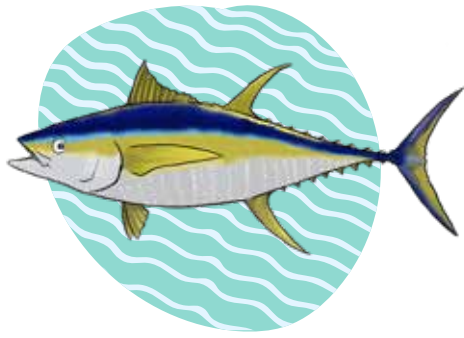
Fleets continue to increase in size. As of June 2020, 5 RFMOs listed 7,125 longliners and 2,398 purse seiners.⁷² The Pacific Ocean is the largest source of tuna having supplied roughly 69% or 4.6 million metric tons of tuna in 2017.⁷³ For the same year, the second largest source of tuna was the Indian ocean, supplying about 22% or 2.46 million metric tons for the same year.⁷⁴

To characterise which fishing gear types catch which species of fish, Infographics (pages 22 & 23) shows the 2018 species caught in metric tons per fishing gear in the Western Central Pacific Ocean.⁷⁵



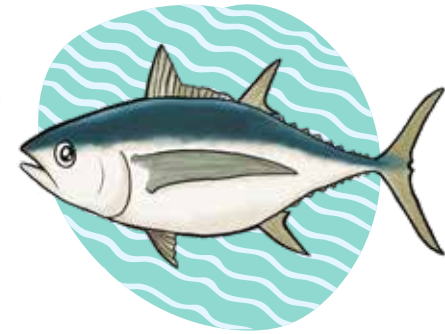
SKIPJACK

• Longline	4,144 mt
• Pole and Line	172,036 mt
• Purse seine	1,459,442 mt
• Troll	2,363 mt
• Others**	204,162 mt



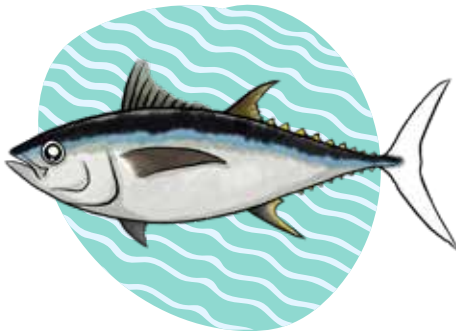
YELLOWFIN

• Longline	97,548 mt
• Pole and Line	25,503 mt
• Purse seine	369,571 mt
• Troll	2,718 mt
• Others**	194,867 mt



ALBACORE

• Longline	79,009 mt
• Pole and Line	0 mt
• Purse seine	0 mt
• Troll	2,731 mt
• Others**	396 mt



BIGEYE

• Longline	68,518 mt
• Pole and Line	4,174 mt
• Purse seine	63,836 mt
• Troll	175 mt
• Others**	11,282 mt

Source: WCPFC (2019)⁷⁶

** Other fishing gears Includes troller, fishery research vessel, multi purpose vessel, driftnets, gillnets, harpoons, hook and lines, handliner, fishing vessel not specified, liner, jigging line, lift netter, mother ship, seiner, trawler-drifter, stern trawler, trawler, tuna mothership, fishery training vessel.

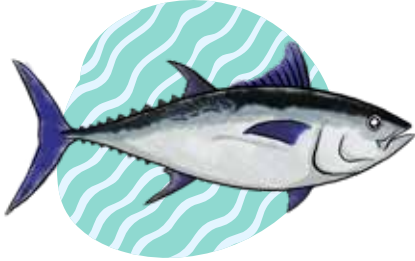
SPECIES STATUS ON IUCN RED LIST, IOTC AND WCPFC

The International Union for Conservation of Nature's (IUCN) Red List⁷⁷ has listed global populations of both albacore (*Thunnus alalunga*) and yellowfin (*T. albacares*) as "Near Threatened," and with populations decreasing,^{78 79} bigeye (*T. obesus*) as "Vulnerable," and with populations decreasing.^{80 81} Some companies in this report are catching one or more of these species of tuna. skipjack (*Katsuwonus pelamis*) and kawakawa (*Euthynnus affinis*) are

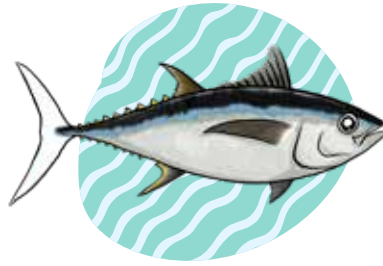
of least concern and with a stable population,^{82 83} while an assessment has yet to be made for longtail tuna (*T. tonggol*).⁸⁴ It is important to note that tuna stock status varies across oceans.

According to Indian Ocean Tuna Commission (IOTC), albacore, skipjack and bigeye are not overfished compared with yellowfin, which is being overfished.⁸⁵ In the Western Central Pacific Fisheries Commission, recent studies indicate that albacore, skipjack, yellowfin and bigeye are not overfished.⁸⁶

SPECIES CAUGHT



1 OUT OF 20
COMPANIES
USE KAWAKAWA



4 OUT OF 20
COMPANIES
USE BIGEYE



1 OUT OF 20
COMPANIES
USES BONITO

GEARS USED

ALL 20
COMPANIES
SOURCE FROM
THE WESTERN
CENTRAL PACIFIC
OCEAN

4 COMPANIES
SOURCE FROM THE
INDIAN OCEAN



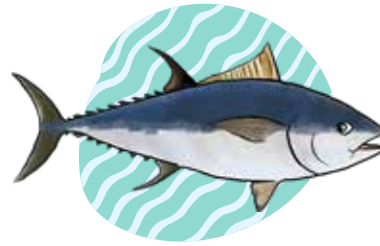
12 OUT OF 20 COMPANIES
SOURCE FROM FAD-FREE
PURSE SEINE FISHING



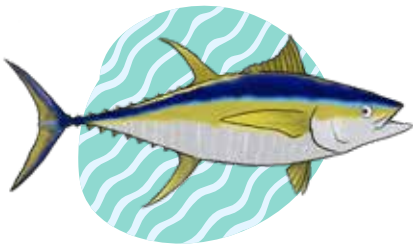
1 OUT OF 20
COMPANIES SOURCE
FROM LONGLINE



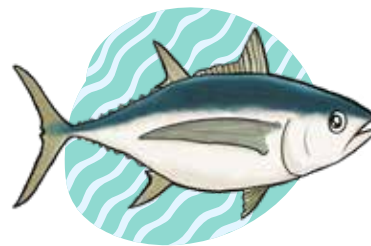
**ALL 20
COMPANIES
USE SKIPJACK**



**3 OUT OF 20
COMPANIES
USE TONGGOL**



**15 OUT OF 20
COMPANIES
USE
YELLOWFIN**



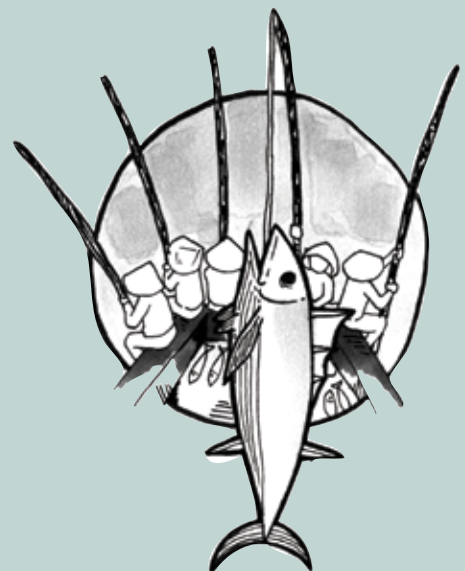
**2 OUT OF 20
COMPANIES
USE ALBACORE**



**6 OUT OF 20
COMPANIES SOURCE
FROM HANDLINE**



**14 OUT OF 20
COMPANIES SOURCE
FROM PURSE SEINERS**



**9 OUT OF 20 COMPANIES
SOURCE FROM POLE AND
LINE**

METHODOLOGY

Greenpeace Southeast Asia contacted the top nine tuna brands from Thailand, the top five tuna canneries from Indonesia, and the top six canneries from the Philippines.

Greenpeace Southeast Asia requested that the companies participate in this year's survey process, and offered to help each company to accurately complete the questionnaires. It is important to note that all surveys were distributed and answered prior to nearly all of the global COVID-19 shutdowns, and that the performance period evaluated was 2019.

In Thailand, the brands included make up almost 100% of the domestic canned tuna market, with Nautilus and Sealect comprising 85%. In the Philippines, nearly all of the canneries are based in General Santos, the tuna capital of the Philippines, and they supply international and domestic markets. In Indonesia, the participants are all members of the Indonesian Pole and Handline Fisheries Association (AP2HI), which also supplies international and domestic markets.

While two brands in Thailand (Sealect and TCB) decided not to complete the survey, Greenpeace Southeast Asia was able to profile and score based on publicly available information.

SCORING AND UPDATES FOR 2020

This year's rankings rely on the same scoring methodology of prior years to ensure consistency across time. However, there have been changes in the weighing for all criteria except for driving change, which remains at 10%. Traceability has been increased from 10% to 15%. Sustainability has been reduced from 30% to 20%. In order to better capture the frightening amount of labor abuse and the slavery-like situation that remains in the industry, we have increased the significance of the legality category by increasing it from 10% to 20%, while downplaying the significance of the equity category⁸⁷ by reducing it from 7.5% to 5%. Specifically in the legality section, additional and revised sub-questions have been added to directly examine what companies are doing to prevent IUU and labor abuse-tainted seafood from entering their supply chains. Finally, the sourcing policy category has been reduced from 25% to 20%, and the transparency and customer information category has increased from 7.5% to 10%.



An underlying current throughout is a higher burden of proof and documentation required from companies to obtain full scores in areas of traceability, legality, and sustainability. In other words, where a more lenient approach may have been given in prior assessments, Greenpeace Southeast Asia assessors have employed a stricter lens in determining whether documentation supports company claims surrounding auditing practices, traceability, procurement, certifications, and other items.

This year, Greenpeace Southeast Asia held a series of workshops in the Philippines, Indonesia, and Thailand to present the survey once again, walk companies through the process in a step-by-step

fashion, and answer any questions.

Greenpeace Southeast Asia invited companies to voluntarily participate in this survey. While laws in Indonesia, the Philippines, and Thailand do not oblige companies to participate in this survey or disclose corporate information to the public, Greenpeace Southeast Asia believes that greater company transparency is the first step towards a traceable, sustainable, and worker-friendly tuna supply chain that would allow the public to make more informed purchasing decisions. Greenpeace Southeast Asia does not disclose confidential business information, but rather only salient information which could help customers make an informed choice on which brands source most responsibly.

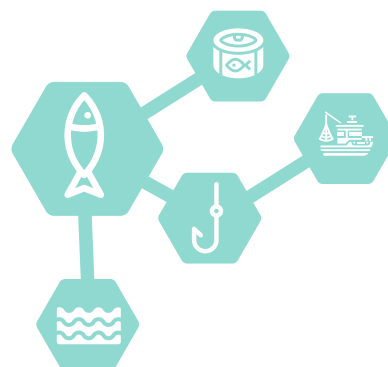
GREENPEACE ASSESSED COMPANY PERFORMANCE AGAINST A SEVEN- POINT CRITERIA

Here are some examples of questions that are asked in each of the seven categories:

15%

TRACEABILITY

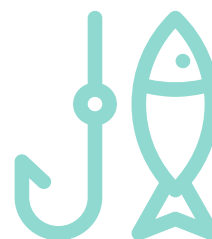
Is the tuna traceable from sea to shelf? Does the company have annual audits conducted by a credible, independent, and reputable third party auditor? Does the audit include where a specific tuna came from, the fishing ground, fishing vessel, and fishing method?



20%

SUSTAINABILITY OF CURRENT SOURCING

Did the tuna come from stocks that are healthy, and not overfished or experiencing overfishing? Was the tuna caught using fishing methods that avoid catching other marine life like sharks, turtles, or baby tuna (e.g. using pole and line)? Or was it caught using indiscriminate and irresponsible fishing methods, such as longline or purse seine fishing that relies upon fish aggregating devices (FADs)?



20%

LEGALITY AND LABOR CONCERNS

Are tuna fishing vessels involved in illegal, unreported, or unregulated (IUU) fishing? Does the tuna brand/cannery take measures to proactively verify that it is not sourcing from vessels or fishing companies that have been involved in IUU fishing? Does the company support and promote the ratification of ILO Work in Fishing Convention (C-188)? Does it promote decent work for the workers who fish, process and produce seafood, and advocate for the elimination of fundamental human and labour rights abuses? Does it have a system where migrant fishers can anonymously and safely report forced labor issues on board distant water fishing fleets?



5%

EQUITY/SOCIAL RESPONSIBILITY

Does the company ensure the protection of local workers and communities while a fair return of profits?



20%

SOURCING POLICY

Does the company show commitments and time bound implementation on sustainability? Does the company source from fishing vessels involved in at-sea transshipments?



10%

TRANSPARENCY AND CUSTOMER INFORMATION

Does the company demonstrate transparency and promote informed customer choices? Does the company website inform consumers about procurement policies as well as details on - for example - species of tuna used, fishing area, fishing method, and fishing vessel?











































10%

DRIVING CHANGE

Does the company support or invest in the development of more sustainable and equitable fishing? Does the company support comprehensive Fisheries Improvement Projects? Does it collaborate towards developing measures to reduce if not eliminate modern slavery at sea and support global advocacy efforts to ratify the Work in Fishing Convention?




RANKING BY CRITERIA


NO	COUNTRY	NAME OF CANNERY	2020 SCORING	TRACEABILITY
01		PT. Citra Raja Ampat Canning	73.40	
02		Super C Chef brand of Sea Value PLC	72.48	
03		Alliance Select Foods International	71.57	
04		PT. Samudra Mandiri Sentosa	70.56	
05		Aro of Siam Makro manufactured by Pataya	66.12	
06		PT. Sinar Pure Foods International	63.83	
07		Nautilus brand of Pataya Foods	60.84	
08		General Tuna Corporation	59.27	
09		PT. Deho Canning Company	59.16	
10		Tops by Thai Union for Central Food Retail, Co.	58.72	
11		Seatrade Canning Corporation	58.45	
12		PT. Aneka Tuna Indonesia	57.61	
13		RD Manufacturing Group	54.89	
14		Ocean Canning Corporation	54.50	
15		Sealect brand of Thai Union	54.27	
16		Ayam produced by Thai Union	53.77	
17		Tesco produced for Tesco Lotus by Unicord, Sea Value PLC.	51.21	
18		Celebes Canning Corporation	50.84	
19		TCB brand of Tropical Canning	45.06	
20		Roza brand of Hi-Q Food Products	37.72	

CANNERIES & BRANDS WERE RANKED ON A SCALE OF 1-100





































 0-39 = POOR

 40-69 = FAIR

 70-100 = GOOD

RANKING BY FISHING GEAR AND SPECIES USED

NO	COUNTRY	NAME OF CANNERY	2020 SCORING	POLE & LINE	HANDLINE
01		PT. Citra Raja Ampat Canning	73.40		
02		Super C Chef brand of Sea Value PLC	72.48		
03		Alliance Select Foods International	71.57		
04		PT. Samudra Mandiri Sentosa	70.56		
05		Aro of Siam Makro manufactured by Pataya	66.12		
06		PT. Sinar Pure Foods International	63.83		
07		Nautilus brand of Pataya Foods	60.84		
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19		TCB brand of Tropical Canning	45.06		
20		Roza brand of Hi-Q Food Products	37.72		

CANNERIES & BRANDS WERE RANKED ON A SCALE OF 1-100

FAD FREE PURSE SEINE	PURSE SEINE	LONGLINE	SKIPJACK	YELLOWFIN	BIGEYE	BONITO	TONGGOL	KAWAKAWA	ALBACORE
			🐟	🐟					
			🐟						
🐟	🐟		🐟	🐟	🐟	🐟			
🐟			🐟	🐟					
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	🐟		🐟	🐟					
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🐟	🐟	🐟	🐟	🐟			🐟		🐟
	🐟		🐟	🐟	🐟				

COMPANY PROFILES



PT. CITRARAJA AMPAT CANNING

73.40



INDONESIA

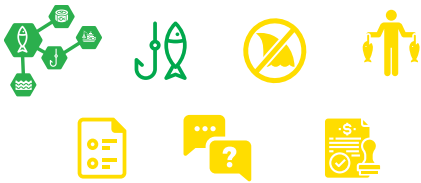
Citaraja Ampat Canning and Deho Canning are two companies under the same management. Citaraja sources 95% skipjack and 5% yellowfin from the Western Central Pacific Ocean, caught exclusively through 70% pole and line and 30% handline. In its sustainability commitment, the company strives to implement traceability, sustainability, and procurement policies that also benefit fishermen. However, Citaraja should either establish its own company website or find another online method to inform the public about its sustainability policy.

The company's tuna achieved an MSC certification in 2018.⁸⁸ Greenpeace Southeast Asia urges Citaraja Ampat to advocate publicly for the ratification in Indonesia of the Work in Fishing Convention. The company should also bolster its due diligence on labor by establishing an effective, anonymous grievance mechanism accessible by fishers from its direct supplier vessels, and by engaging with trade unions or representative workers organizations in the sector.



PT SAMUDRA MANDIRI SENTOSA

70.56



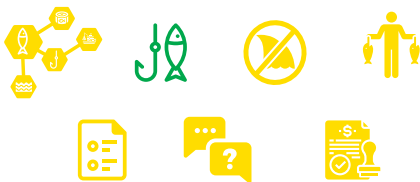
Samudra Mandiri Sentosa’s supply comes from 74% pole and line, 18% FAD free, and 8% handline. It sources from Indonesian pole and line fishermen. The company sources 79% skipjack and 21% yellowfin tuna from the Western Central Pacific Ocean. Pursuant to its sustainability policy, it is working towards its goal of sourcing over 80% pole and line and handline. It contracts with a third-party auditor for traceability and other areas, giving its buyers an extra layer of confidence in the product. The sustainability policy also includes provisions against IUU fishing. It also adheres to the Indonesian Pole and Line and Handline Fishing Association (AP2HI) Code of Conduct.

While the company is sourcing from Indonesian pole and line fishermen - a sector known for few instances of labor abuse - Greenpeace Southeast Asia urges Samudra Mandiri Sentosa to publicly advocate for the ratification of the Work in Fishing Convention not only Indonesia, but in other countries as well. The company should also bolster its due diligence on labor by establishing an effective, anonymous grievance mechanism accessible by fishers from its direct supplier vessels, and by engaging with trade unions or representative workers organizations in the sector.



PT SINAR PURE FOODS INTERNATIONAL

63.83



Sinar Pure Foods (SPF) International is among Indonesian canneries that procure only from sustainable fishing methods, with 40% FAD-free tuna fishing, 14% handline, and 46% pole and line, all coming from the Western Central Pacific Ocean. SPF sources 60% skipjack, 30% yellowfin, and 10% longtail. The company also adheres to the Indonesian Pole and Line and Handline Fishing Association (AP2HI) Code of Conduct. Sinar Pure Foods also encourages vessel owners to join the proactive vessel registry scheme which indicates commitment to traceability. The company should strengthen its procurement policy, as it currently contains several objectives and priorities, which are not as binding as hard requirements. Its policy should also include language in support of marine reserves and should require that all sourcing be derived from vessels and canneries that operate under the International Labor Organization core conventions.

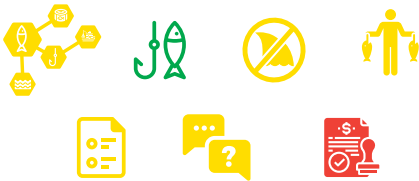
While the company is sourcing from Indonesian pole and line fishermen - a sector known for scant instances of labor abuse - Greenpeace Southeast Asia urges SPF to publicly advocate for the ratification of the Work in Fishing Convention not only in Indonesia, but in other countries as well. The company should also strengthen its due diligence on labor by establishing an effective, anonymous grievance mechanism accessible by fishers from its direct supplier vessels, and by engaging with trade unions or representative workers organizations in the sector.

The company scored poorly in the driving change category because it is doing little in terms of spurring reforms via progressive initiatives or other collaborative efforts. It received credit for its involvement in a comprehensive FIP with AP2HI, but for nothing else. Fortunately, its stellar current sourcing was able to earn it a green score for that category.



PT DEHO CANNING COMPANY

59.16



Citraraja Ampat Canning and Deho Canning are two companies under the same management. Like Citraraja, Deho Canning sources skipjack (80%) and Yellowfin (20%) in the Western Central Pacific Ocean. Deho has drastically shifted from suppliers using purse seine to suppliers fishing with 100% handline. Because of its 100% handline sourcing, the company de facto does not rely on at-sea transshipment at all. Deho Canning has yet to develop its own official website and must immediately publish a publicly-available procurement policy.

While the company is sourcing from Indonesian pole and line fishermen - a sector known for scant instances of labor abuse - Greenpeace Southeast Asia urges Deho to publicly advocate for the ratification of the Work in Fishing Convention not only in Indonesia, but in other countries as well. The company should also bolster its due diligence on labor by establishing an effective, anonymous grievance mechanism accessible by fishers from its direct supplier vessels, and by engaging with trade unions or representative workers organizations in the sector.



PT ANEKA TUNA INDONESIA

57.61



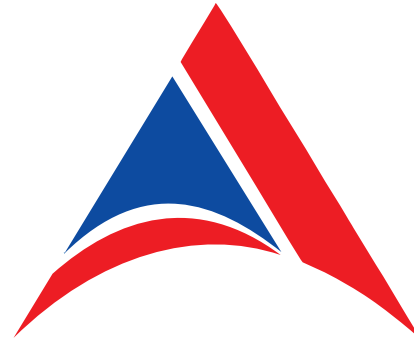
Aneka Tuna Indonesia (sold domestically as Sunbell) procures tuna from a wide variety of fishing gears, including unsustainable purse seine (57%) and more sustainable handline (21%) and pole and line (20%) methods. It also sources a greater variety of tuna species compared to other companies. This includes skipjack (73%), yellowfin (25%) and less than 2% each of albacore and tonggol. It also adheres to the Indonesian Pole and Line and Handline Fishing Association (AP2HI) Code of Conduct. The company's "Tuna Sustainability Policy" has a provision against IUU fishing, the promotion of less aggressive fishing methods, traceability from sea to plate, and transparency. It could improve in its traceability score by employing a third party auditor of its supply chain. 55% of Aneka Tuna's supply comes from the Indian Ocean, while 45% comes from the Western Central Pacific Ocean.

It must publish a public-facing seafood sustainability policy and strengthen it by including provisions in support of marine reserves, as well as goals to transition its purse seine-caught tuna towards vessels that use more sustainable methods. For example, for sustainability reasons it should stop sourcing Yellowfin tuna caught in the Indian Ocean.

While the company is sourcing from Indonesian pole and line fishermen - a sector known for scant instances of labor abuse - Greenpeace Southeast Asia urges Aneka Tuna to publicly advocate for the ratification of the Work in Fishing Convention not only in Indonesia, but in other countries as well. The company should also bolster its due diligence on labor by establishing an effective, anonymous grievance mechanism accessible by fishers from its direct supplier vessels, and by engaging with trade unions or representative workers organizations in the sector.

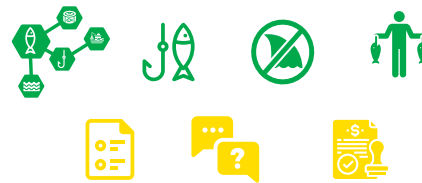


PHILIPPINES



ALLIANCE SELECT FOODS INTERNATIONAL

71.57



Alliance Select, makers of the Bay of Gold brand, has a strong traceability system in place that is reviewed by a third-party auditor. The company is sourcing skipjack (82%), yellowfin (16.9%), bigeye (1%) and bonito (0.10%). Around 85% are caught using the more sustainable FAD-free fishing method, and the remaining 15% are caught by purse seine vessels.

In addition to species and fishing gears used, the company's tuna procurement policy also contains a provision against IUU fishing and transshipment at sea, and provisions which provide for "safe and fair working conditions," "equitable" fishing agreements, ethical fishing methods, and strict human rights standards.

Greenpeace Southeast Asia urges Alliance Select to advocate publicly for the ratification of the Work in Fishing Convention, not only in the Philippines but in the supplying countries as well.

The company needs more work in the Driving Change criteria. We strongly recommend proactive involvement in comprehensive Fisheries Improvement Projects in the Philippines. It should bolster its due diligence on labor by establishing an effective, anonymous grievance mechanism accessible by fishers from its direct supplier vessels, and by engaging with trade unions or representative workers organizations in the sector. D.O. 156-16, passed in 2016,⁸⁹ is a national law governing "Rules and regulations governing the working and living conditions of fishers on board fishing vessels engaged in commercial fishing operation." As it has yet to be fully implemented across the country, we recommend that Alliance Select ensure that Philippine suppliers conform with D.O. 156-16.



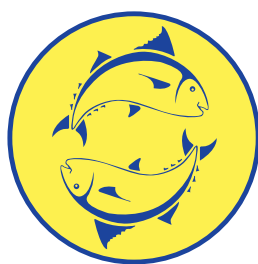
GENERAL TUNA CORPORATION

59.57



General Tuna Corporation, maker of the Century Tuna brand, has a strong traceability policy and system in place, and audited by a third-party. The company supports marine reserves on the high seas and its publicly posted sourcing policy indicates a complete ban on longline and driftnet fishing methods. For Skipjack tuna, (0.096%) is caught using pole and line, (20.8%) caught using FAD free purse seine and (79.104%) using purse seine. For Yellowfin tuna, (1%) is caught by handline, (20.8%) from FAD free and (78.2%) from purse seiners. For bigeye, (20.8%) is caught from FAD free and (79.2%) are caught by purse seiners. We strongly recommend establishing a procurement policy transition from purse seine caught tuna towards a sustainably caught tuna (e.g. FAD free purse, handline and pole and line).

Greenpeace Southeast Asia urges General Tuna to advocate publicly for the ratification of the Work in Fishing Convention, not only in the Philippines but in the supplying countries as well. The companies' recent procurement policy⁹⁰ supports the full implementation of DO 156-16⁹¹ "Rules and regulations governing the working and living conditions of fishers on board fishing vessels engaged in commercial fishing operation." This policy explicitly states that "it will not engage business with fishing companies who are reportedly involved with labor abuses on fishing boats that do not conform with national and international laws on fair working conditions at seas." General Tuna Corporation should also improve its due diligence on labor by establishing an effective, anonymous grievance mechanism accessible by fishers from its direct supplier vessels, and by engaging with trade unions or representative workers organizations in the sector.



SEATRADE CANNING CORPORATION

58.45



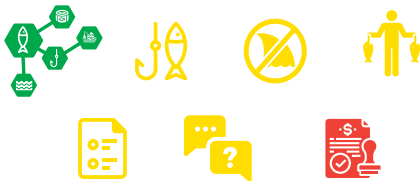
At first glance, Seatrade has an impressive seafood procurement policy. However, while some provisions of this policy promote progressive conservation measures, the policy falls short of explicitly supporting the use of sustainable fishing methods. Seatrade sources skipjack (90%) and yellowfin (10%) from the Western Central Pacific Ocean. While it does rely on FAD-free purse seine fishing for some of its catch, most of its supply comes from regular purse seine vessels. There is also nothing in its policy that addresses human trafficking in the industry. While the company has an official website, it could be further improved by publishing its sustainable tuna policy online for the public to see.

We recommend inclusion of a tuna procurement policy which effectively persuades Philippine flagged vessels to comply with D.O. 156-16⁹² "Rules and regulations governing the working and living conditions of fishers on board fishing vessels engaged in commercial fishing operation". Seatrade should strengthen its due diligence on labor by establishing an effective, anonymous grievance mechanism accessible by fishers from its direct supplier vessels, and by engaging with trade unions or representative workers organizations in the sector.



RD MANUFACTURING GROUP

54.89

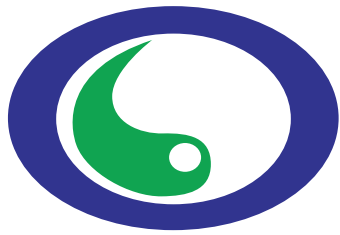


RD Manufacturing Group's (RDMG) profile is based on publicly available but unverified information. For some criteria, Greenpeace Southeast Asia would need an official response and supporting documents to award full credit.

Philbest Canning Corp. is RD Corporation's canned tuna brand in the Philippines. Since its wholly-owned subsidiaries Philbest and RD Tuna Cannery have not responded this year, Greenpeace Southeast Asia has arrived at educated estimates via cross-referencing its 2018 data and information provided on the company website. While it is unsettling that the company chose to not participate this year, the company's website is more transparent than most of its peers when it comes to detailing traceability and sustainability measures. Philbest sources around 70% skipjack and 30% yellowfin. Approximately 75% of its supply is caught by FAD-free purse seine vessels, 15% is caught via purse seine vessels, and 10% is pole and line caught. The RDMG code of conduct for procurement⁹³ includes explicit provisions on responsible fish procurement, protection of the environment, tuna sustainability, human rights, and professional conduct.

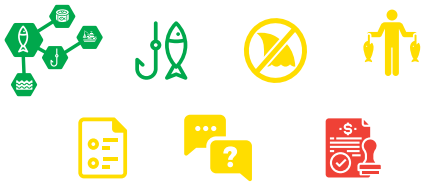
RD Tuna Cannery Ltd. (based in Papua New Guinea), is also owned by the RD Group of Companies. RD Tuna Cannery has an MSC Chain of Custody certification, and a Fish Sustainability Manual which "delineates the guiding principle in handling non-free school (NFS), free school (FS) [FAD-free], and MSC certified raw fish material from the time of purchasing of raw fish material to delivery of the finished products." Both RD Tuna Cannery and Philbest are part of the Business Social Compliance Initiative.⁹⁴

We recommend inclusion of a provision in the RDMG code of conduct for procurement that persuades Philippine flagged vessels to comply with D.O. 156-16⁹⁵ "Rules and regulations governing the working and living conditions of fishers on board fishing vessels engaged in commercial fishing operation". RD Manufacturing should also strengthen its due diligence on labor by establishing an effective, anonymous grievance mechanism accessible by fishers from its direct supplier vessels, and by engaging with trade unions or representative workers organizations in the sector.



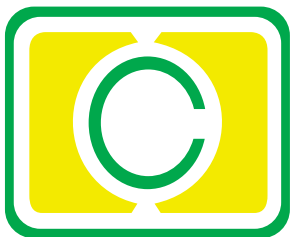
OCEAN CANNING
CORPORATION

54.50



Ocean Canning needs to invest in a more robust traceability program and should consider hiring a third-party auditor. The company is being supplied by Philippine flagged fishing vessels. While it did provide evidence of government inspection from the Bureau of Fisheries and Aquatic Resources, the company has a skeletal procurement policy that is light on details and unclear on level of implementation. Ocean Canning claims to supply 50% FAD-caught and 50% FAD-free tuna, with skipjack (95%) and yellowfin (5%) coming from the Western Central Pacific Ocean. It submitted enough documentation to substantiate most of its sustainability claims. In response to this survey, the company compiled pre-existing practices and new, piecemeal policies into one cohesive tuna sustainability and procurement policy. The company has yet to create its official website, and therefore its procurement policy remains hidden to the public.

As Ocean Canning continues to refine its procurement policy, we strongly recommend inclusion of a provision that persuades Philippine flagged vessels to collaborate with labor groups for the full implementation of D.O. 156-16⁹⁶ "Rules and regulations governing the working and living conditions of fishers on board fishing vessels engaged in commercial fishing operation." Ocean Canning should also strengthen its due diligence on labor by establishing an effective, anonymous grievance mechanism accessible by fishers from its direct supplier vessels, and by engaging with trade unions or representative workers organizations in the sector.



CELEBES
CANNING

50.84



In its supporting documentation, Celebes Canning provided Greenpeace with a German client's label to establish the country of origin, FAO code, and QR code. While it claims to have no FAD-free product in the survey, the company suggested that it does source small quantities according to supplemental documents provided. Celebes sources skipjack (roughly 72%), yellowfin at about 27%, and for bigeye (0.85%). The company has yet to create an official website, making its tuna procurement policy unavailable to the public. Celebes Canning should enable buyers' confidence in its product by hiring a third-party auditor to verify the integrity of its supply chain. Celebes is mostly supplied by Philippine fishing companies for its canned tuna and by one foreign company that supplies frozen tuna.

As with other canneries in General Santos City, we strongly recommend inclusion of a tuna procurement policy that persuades Philippine flagged vessels to collaborate with labor groups for the full implementation of D.O. 156-16⁹⁷ "Rules and regulations governing the working and living conditions of fishers on board fishing vessels engaged in commercial fishing operation". Celebes Canning should also bolster its due diligence on labor by establishing an effective, anonymous grievance mechanism accessible by fishers from its direct supplier vessels, and by engaging with trade unions or representative workers organizations in the sector.



SUPER C CHEF

brand owned and manufactured by **Sea Value PLC**

72.48

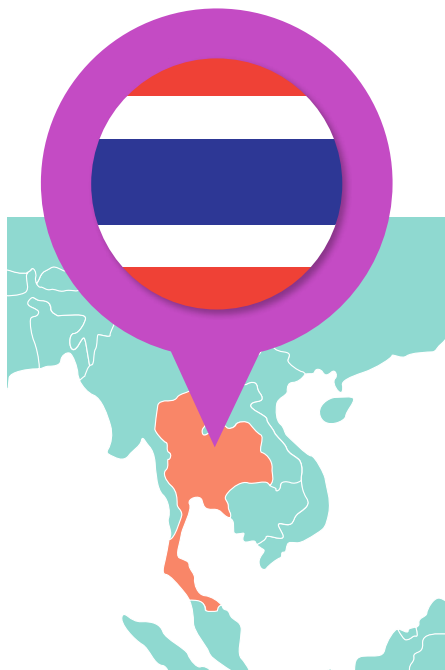


Super C Chef, by Sea Value, leads the pack for the Thai companies, primarily due to its strong traceability and for procuring tuna caught with a very responsible gear type. It has a “Sustainable Seafood Procurement and Processing Policy”⁹⁸ posted on its website.

Super C Chef brand, is manufactured by Unicord Public Co. Ltd., a subsidiary of Sea Value. This manufacturer has an MSC Chain of Custody certificate and Dolphin safe certificate. It sources 100% pole and line-caught Yellowfin tuna caught from the Banda Sea (FAO 71) of the Western Central Pacific Ocean. The company is careful to avoid the problematic practice of at-sea transshipment, by only allowing for the transfer of catch at a port. This is the gold standard that other tuna processors should follow. While pole and line fishing is generally associated with fewer instances of labor abuse, the company could nonetheless improve its performance in this area.

Customers can find additional information regarding the species used, fishing ground, fishing gear, vessel name and flag and the date of fishing using Trace my Catch.⁹⁹ This user-friendly method of transparency is a standard that other brands should follow. Sea Value’s Ethical Trading and Social Policy includes a grievance mechanism where unethical or business practice violations can be reported anonymously. Sea Value should also engage with trade unions or representative workers organizations in the sector.

While *Super C Chef* is a traceable and sustainable brand locally sold in Thailand, ascertaining the status of OEM brands sold and produced by Sea Value and its subsidiaries in Europe falls beyond the scope of this report.



THAILAND



ARO

brand of Siam Makro and
manufactured by
Pataya Food Industries

66.12



Aro is the private label brand for the Siam Makro supermarket chain, and is manufactured by Pataya Food Industries. While the company has a sustainable sourcing policy, explicit language on sourcing from sustainable fishing gears has yet to be included. Fortunately, the company provided enough documentation to establish that its 2018 commitment to prioritize FAD-free caught tuna has manifested into real results.

Makro works closely with its supplier, and sources 100% skipjack tuna from the Western Central Pacific Ocean. 100% of its procured tuna is sourced from FAD-free purse seining, which is a sustainable sourcing method.

Makro's "Human rights and labor practices policy"¹⁰⁰ has established procedures for investigating allegations of human rights violations while ensuring confidentiality for complainants. It should strengthen its own due diligence on labor by establishing an effective, yet anonymous grievance mechanism accessible by fishers from its direct supplier vessels, and by engaging with trade unions or representative workers organizations in the sector. While Makro benefits from Pataya's policy, which forbids procurement of tuna from vessels involved in at sea transshipment, Makro should consider codifying this stance in its own policy, in order to prevent a possible future change in stance by its supplier. Makro should also publicly support marine reserves.

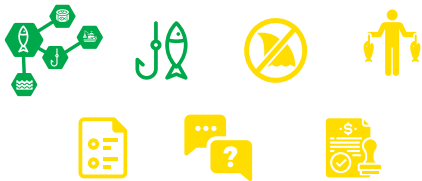
Aro uses iTrace software¹⁰¹ to allow customers to access information about the species, fishing ground and fishing gear used, all via a mobile app. This is an exemplary effort in providing transparency to customers. Siam Marko also engages in Thailand-based mangrove restoration efforts and promotes the development of juvenile "fish banks" for coastal communities, which are unique corporate social responsibility (CSR) efforts towards driving change in the industry overall.



NAUTILUS

brands owned and manufactured
by **Pataya Food Industries**

60.84



Nautilus source skipjack, yellowfin and *Euthynnus affinis* (*kawakawa*) from the Western Central Pacific Ocean and the Indian Ocean. Pataya sources 35% of its tuna from FAD-free purse seine vessels, while 65% were caught using purse seine vessels. Pataya Food Industries has a thorough traceability policy complete with a third-party auditor as well as an MSC Chain of Custody audit.

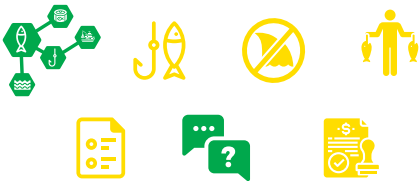
Pataya is the first company to explicitly forbid procurement of tuna from vessels involved in transshipment at sea. This is the gold standard that other tuna processors should follow. It made a strong showing in the legality category; to achieve green, it would need to make additional reforms in due diligence, for example, by establishing an effective, anonymous grievance mechanism accessible by fishers from its direct supplier vessels, and by engaging with trade unions or representative workers organizations in the sector.

Pataya's "Statement of Sustainability" has provisions on procurement and expresses the company's support of research initiatives that reduce bycatch associated with FADs. Pataya's policy should be more explicit in its promotion of equitable sourcing practices and its support of existing and proposed marine reserves. The company should also consider sourcing more supply from sustainable fishing methods like pole and line fishing.



TOPS
SUPERMARKET
 manufactured by **Thai Union**

58.72



Tops Supermarket sources 100% skipjack, wherein over the past two years, 99% was caught by purse seiners and 1% was caught using a FAD free tuna fishing method. This procurement shift from their former sustainable sourcing (as profiled in the 2018 version of this report) had a significant impact on the company's score. Fortunately, *Tops* managers are taking concrete steps towards likely being able to source 100% FAD-free by the end of 2020.

While Greenpeace Southeast Asia welcomes the company's commitment to return to 100% FAD free by the end 2020, we recommend that the company put in place a strong procurement policy where sustainable methods of fishing (e.g. handline, pole and line and FAD free caught tuna) are the preferred supply. Such a policy would prevent future procurement decisions from changing based on market forces that might sideline sustainability and labor concerns. *Tops* should also consider a procurement policy that forbids sourcing from suppliers that engage in at sea transshipment.

To protect people, *Tops* should establish policy measures that would align with ILO C-188 (Work in Fishing Convention). While policy measures should be clearly communicated with suppliers, *Tops* should also conduct due diligence. While *Tops* has taken steps to reduce the odds of sourcing IUU seafood, it could bolster its performance on labor by establishing an effective, anonymous grievance mechanism accessible by fishers from its direct supplier vessels, and by engaging with trade unions or representative workers organizations in the sector



SEALECT

Brand owned and manufactured
by **Thai Union**

54.27



Sealect profile based on publicly available information and official communication from the parent company, Thai Union. For some criteria, Greenpeace Southeast Asia would need an official response and supporting documents to award full credit.

In 2019, *Sealect* controlled 46.5% of the market share value of the canned tuna market in Thailand.¹⁰² For purposes of this report, this profile is an evaluation of Thai Union's Sealect brand for the domestic and regional market, and not an evaluation of Thai Union as a whole or its other wholly-owned brands. Unlike in previous years, Sealect did not participate in the survey process. Instead, the CSR representative of Thai Union provided some input on Thai Union initiatives at the global level. Thai Union claims that commitments made at the global level,¹⁰³¹⁰⁴ apply for Sealect branded tuna as well.

For some of Thai Union's foreign brands, customers can trace each can using an online can tracking tool,¹⁰⁵ and access key traceability information such as species of tuna, fishing gear, and fishing area. This also holds true for Sealect, which reflects positively on the parent company for making this transparency feature apply for its domestic market as well. Thai Union claims that its Sealect brand tuna is 100% purse seine caught Skipjack tuna. The company should source from more sustainable fishing methods, such as either increasing its percentage of pole and line, or shifting to FAD-free purse seine caught tuna. FAD-caught purse seine

fishing is an indiscriminate method that results in bycatch and juvenile tuna being commonly landed.

Greenpeace Southeast Asia acknowledges Thai Union's efforts to ensure that their suppliers are not involved in forced labor. While the Thai Union Group garnered a #1 slot in the World Benchmarking Alliance's Seafood Stewardship Index, its score for the human rights and working condition is only 1.92 out of a perfect score of 5.106 Thai Union's Fishing Vessel Improvement Program and Code of Conduct¹⁰⁷ is a step in the right direction, but the company still needs to show its policies and processes result in fewer human rights abuses and more effective remediation of identified abuses. While there is a detailed procedure for the anonymous submission of complaints,¹⁰⁸¹⁰⁹ questions remain as to whether potential complainants (e.g., itinerant, migrant fishers out at sea) would even have access to smartphones to send their complaints in the first place. To the company's credit, it does provide an email address for complaints: VesselCode@thaiunion.com. Indeed, the company did not answer Greenpeace's question on how many complaints had been received from crew members or others in its supply chain through the channels provided by the company, instead referencing having conducted many interviews with crew as part of its Vessel Code of Conduct. Thai Union also has other channels where complaints can be submitted confidentially, but this is meant for Thai Union employees only.¹¹⁰

On the issue of transshipment, Thai Union's policy¹¹¹ aligns with ISSF measures,¹¹² which fall short of banning transshipment at sea. Thai Union has agreed to refrain from purchasing tuna from transshipment vessels in the territorial waters of Thailand.¹¹³

Pertaining to recruitment fees¹¹⁴ shouldered by migrant fishers, the measures permit legally permissible recruitment fees assessed to the migrant fisher, so long as not "egregious." This critical standard is not defined. Greenpeace Southeast Asia strongly recommends that Thai Union take the lead in collaborating with global suppliers to develop a simple mobile application paired with a strong non-retaliation policy, where migrant fishers can safely and anonymously report issues such as predatory hiring related fees, garnished wages, and forced labor - and that this be made available to crew on all vessels that supply tuna to the company. The company should also engage with trade unions or representative workers organizations in the sector.



AYAM BRAND
manufactured by *Thai Union*

53.77



Ayam Brand is manufactured by Thai Union. On its Sustainability¹¹⁵ webpage, the company clearly outlines its policy on using skipjack, yellowfin and tonggol. It is well informed about tuna stock status, and to the company's credit, it has recognized: "Our area of influence is in the purchasing specifications we provide to the canned tuna manufacturers."¹¹⁶ It is a reminder to all tuna brands that they should not hesitate to have the necessary conversations with their suppliers to ensure sourcing that is protective of both workers and the marine environment. The company sources 53% skipjack, 25% yellowfin and 22% tonggol from the Western Central Pacific Ocean.

Only 2 percent of tuna product is pole and line caught and the remaining 98% is sourced via purse seiners vessels. The company should source from more sustainable fishing methods, such as either increasing its percentage of pole and line, or insisting on FAD-free purse seine caught tuna. FAD-caught purse seine fishing is an indiscriminate method that results in bycatch and juvenile tuna being commonly landed.

Ayam has taken some positive steps towards reducing the odds of sourcing IUU seafood, by focusing on this sector in its ESG report and having a supplier code of conduct. However, like many of its peers, *Ayam* must do more to ensure that there are no labor violations further down its own tuna supply chain by performing due diligence that goes beyond "full compliance"¹¹⁷ with applicable laws on labor. While *Ayam* does have an online anonymous grievance feature¹¹⁸ where complaints are forwarded to an ethics committee, its branding is not on the webpage and so far it has not shared this widely. There is also an implicit assumption that potential complainants have access to computers or smartphones to send their complaints, which is rarely the case with itinerant, migrant fishers out at sea. It is also unclear how grievances would be resolved. Fortunately, company representatives have expressed interest in addressing some of these oversights. They should also be open to engaging with either trade unions or representative workers organizations in the sector.

On a related note, *Ayam* should solidify its own policy in regards to at-sea transshipment by forbidding this practice and instead favoring monitored transshipments at port - and communicating this to its supplier.

Ayam must also provide more information for the customer to help that person make more informed choices, for example by placing key information on the label, such as the common name of the fish species, fishing method, and fishing area.



TESCO-LOTUS

manufactured by **Unicord**,
Sea Value PLC.

51.21



CP group now owns Tesco-Lotus. However, for purposes of this report, it is being evaluated according to its performance in 2019 under parent company Tesco UK. Since Tesco is manufactured by Unicord Public Co. Ltd., a subsidiary of Sea Value, relevant policies of Unicord Public Co. Ltd. apply regarding traceability, sustainability, processing, and ethical trading.

Thai consumers at a Tesco-Lotus supermarket are not provided with the same sustainable tuna options as their Tesco-shopping British counterparts at parent company Tesco UK. In general, Tesco-Lotus of Thailand operates under the same sustainability policies as from Tesco, but the Thailand office does not have the same policy on sourcing tuna. Instead, Tesco-Lotus primarily relies upon Sea Value's (Unicord) policy. This is a notable missed opportunity for the company to develop its own robust tuna procurement policy that is independent from either its parent company or its primary supplier.

Tesco-Lotus sources 100% skipjack, with the vast majority of it from the Western Central Pacific Ocean - but only a paltry three percent of it is caught by FAD-free purse seine vessels, with the remaining 97% caught by regular purse seine vessels. The company should source from more sustainable fishing methods, such as either increasing its percentage of pole and line, or insisting on FAD-free purse seine caught tuna. FAD-caught purse seine fishing is an indiscriminate method that results in bycatch and juvenile tuna being commonly landed.

As Tesco-Lotus is manufactured by Unicord, it has deferred in large part to the Unicord's policy, which avoids the problematic practice of at-sea transshipment by only allowing for the transfer of catch at a port. Tesco also benefits from Sea Value's Ethical Trading and Social Policy, which includes a grievance mechanism wherein unethical or business practice violations can be reported anonymously. The company should also engage with trade unions or representative workers organizations in the sector. Tesco-Lotus needs to dedicate far more energy on its levels of transparency with supermarket shoppers, as well as getting involved in ocean conservation and tuna procurement initiatives more in line with its former parent company Tesco, except at the Thai/regional level.



TCB

Brand owned and manufactured by **Tropical Canning Public Co. Ltd.**

45.06



TCB profile based on publicly available but unverified information. For some criteria, Greenpeace Southeast Asia would need an official response and supporting documents to award full credit.

TCB declined to participate in this year’s survey process. However, Given TCB’s refreshingly high level of transparency online, Greenpeace Southeast Asia was able to find some publicly available documentation. TCB is primarily an OEM that caters to the needs of its affiliates abroad. 96% of the customers are foreign customers, namely in Australia, the United States, and Canada. Based on the more rigorous sustainable tuna procurement policies of some of its affiliates, such as SAFCOL Australia,¹¹⁹ it appears that the bulk of TCB’s responsibly-caught tuna goes abroad, and is not available for Thai customers.¹²⁰

TCB’s Seafood Sustainability Procurement Policy¹²¹ contains text addressing sustainable and responsible sourcing, traceability, accountability, and transparency. However, its commitment to exclusively source from vessels listed under ProActive Vessel Registry (PVR)¹²² is behind schedule. TCB has yet to begin purchasing longline-caught albacore, yellowfin and bigeye tuna from PVR vessels in 2020,¹²³ which leaves questions as to where its current longline-caught product is coming from. However, it should not be sourcing longline-caught tuna at all - PVR or otherwise - as this sector in particular is fraught with environmental and labor concerns.

Greenpeace Southeast Asia strongly recommends adapting the procurement policy of Safcol Australia and applying it to its own Seafood Sustainability Procurement Policy. TCB should also strengthen its due diligence on labor by establishing an effective, anonymous grievance mechanism accessible by fishers from its direct supplier vessels, and by engaging with trade unions or representative workers organizations in the sector.



ROZA

brand of **Hi-Q Food Products Co.**

37.72



Roza claims to source 84% skipjack, 15% yellowfin, and 1% bigeye tuna caught by purse seine vessels fishing in the Western Central Pacific Ocean. The company has yet to demonstrate evidence of a traceability audit by a third-party.

Hi-Q does not have a canned tuna procurement policy. The procurement policy is very important, as it sets out the guidelines on where and how tuna should be sourced, as well as the criteria for selection of suppliers. Such a policy should require a shift to more sustainable methods of fishing such as FAD-free, handline, or pole and line. Its anticipated policy should also have in place serious measures to prevent IUU from entering its chain of custody, and to protect workers along the entire supply chain. In addition to supporting the ILO Core Conventions, it should also prohibit at-sea transshipment.

In terms of customer information, Hi-Q may wish to implement a QR Code for tuna canned products where consumers can get more information about the species of tuna used, fishing gear, and fishing ground. Hi-Q may also wish to get involved in marine conservation programs towards the protection of the ocean and fisheries resources. Greenpeace Southeast Asia strongly recommends working with industry associations and civil society groups towards the full implementation of ILO C-188 in Thailand. To earn the faith of buyers and protect workers, the company should conduct due diligence on labor by establishing an effective, anonymous grievance mechanism accessible by fishers from its direct supplier vessels, and by engaging with trade unions or representative workers organizations in the sector.

ENVISIONING A MORE SUSTAINABLE AND SOCIALLY JUST FISHING INDUSTRY: WHAT YOUR COMPANY CAN DO

Greenpeace seeks a substantial transformation from fisheries production dominated by large-scale, socially and economically unjust, and environmentally destructive methods to prioritise smaller scale, community-based, labour intensive fisheries using ecologically responsible, selective fishing technology, and environmentally sound practices.

International trade in fisheries products should not undermine the legitimate interests of coastal communities, which include protecting fisherfolk's livelihoods, human and labour rights, or negatively impact food security, especially in developing countries. To this end, the fish trading, processing, and retailing industries have a fundamental role to play by reviewing their purchasing policies and practices so that market conditions are created to favour fisheries that comply with strict social and environmental criteria.

IN ORDER TO ACHIEVE THIS, GREENPEACE SOUTHEAST ASIA STRONGLY RECOMMENDS THE FOLLOWING:

20%
**ON SUSTAINABILITY
OF CURRENT
SOURCING**

The company should source from sustainable fishing gears such as pole and line, handline, and FAD free purse seining. For those sourcing from longline, best available by-catch mitigation practices and an implementation plan to reach 100% observer coverage should be required. Companies must avoid sourcing from stocks that have been deemed to be overfished or are experiencing overfishing by the relevant tuna RFMO.

20%
**ON LEGALITY AND
LABOR ISSUES**

Companies should adhere to their corporate responsibility to respect human rights as outlined in the UN Guiding Principles on Business and Human Rights. This includes establishing a robust human rights policy in line with international human and labor rights standards, conducting human rights due diligence, and ensuring effective remediation of human rights abuses. Companies should also support and promote the ratification of ILO Work in Fishing Convention (C-188), promote decent work¹²⁴ for the workers who fish, process and produce seafood, and advocate for the elimination of fundamental human and labour rights abuses. Brands and companies are strongly advised to collaborate with each other to develop a user friendly platform where migrant fishers can anonymously and safely report forced labor and other human rights issues on board distant water fishing fleets. The development of this application should be used by all Southeast Asian canneries which supply local and global canned tuna markets.

20%
**ON SOURCING
POLICY**

Greenpeace advocates that at-sea transshipments be phased out urgently and that transshipments be conducted only at port under strict scrutiny. Companies should consider sourcing from suppliers that are not involved in transshipment at sea and from vessels that only spend a maximum of three months at sea before going to a port, where they allow crew unfettered access to port services for a minimum of 10 days.

15%
ON TRACEABILITY

Companies should perform annual audits conducted by a credible, independent, and reputable third party auditor. The audit should ensure that brands can trace tuna products back to the fishing ground, fishing vessel, and fishing method. We urge the brands and canneries to periodically publish the list of fishing vessels that supply tuna for their products.

10%
**ON TRANSPARENCY
AND CUSTOMER
INFORMATION**

Companies should maintain transparency by making sure that their websites inform consumers about company procurement policies as well as details on species of tuna used, fishing area, fishing method, and fishing vessel. Brands should provide such information on their packaging and retailers should dedicate store signage to highlight more sustainable tuna options for customers.

10%
ON DRIVING CHANGE

Companies are encouraged to support comprehensive Fisheries Improvement Projects, develop measures to eliminate modern slavery at sea, and support global advocacy efforts to ratify Work in Fishing Convention.

5%
ON EQUITY

Companies can support coastal communities by sourcing from locally owned vessels that fish in their respective EEZs, and by using local ports and crews if the vessels are foreign owned. In the case of processed tuna, companies should source tuna from canneries that operate in the region the tuna was caught and are locally owned.

GLOSSARY



BYCATCH OR NON-TARGETED SEA LIFE

Most fishing gears are not selective. This means that as well as the 'target' species of fish it catches, any number of 'non-target' species may also be hauled in. This 'incidental' catch of other species is referred to as 'bycatch'. Globally, it is estimated that a quarter of what is caught is wasted – thrown back into the sea, because it has no commercial value, and ending up as dead. Fishing quotas mean that fishermen targeting a particular species or size of fish will throw back any 'non-target' or 'too small' fish that they catch.¹²⁶

FISH AGGREGATING DEVICE

Fish aggregating devices (FADs), called payao in the Philippines and rumpun in Indonesia, are large floating objects deployed by fishing vessels to attract fish and make easier the task of finding and catching them. FADs work because tuna and a whole range of other fish and marine animals instinctively gather around such floating objects (as they do around floating logs and even megafauna such as whales and whale sharks), for shelter and protection, and to feed on smaller animals already congregating there.

FREE SCHOOL PURSE SEINE

Refers to the use of purse seine without FADs. Also known as "FAD-free." This is preferable to FAD-caught purse seine. Instead of setting a lure (a FAD)

and catching everything there, the vessel pursues a free-swimming school of skipjack, and sets the purse seine net on them. There is a significantly lower bycatch rate with FAD-free purse seine tuna fishing and fewer juvenile tunas (up to 90% less).¹²⁷

HANDLINE FISHING

A selective and generally responsible fishing method in which a line with a hook, usually baited, is lowered into the water from a drifting, anchored or moving boat. Handlining is holding a line in the hand while waiting either actively or passively for a fish to take the bait. If there is a bite and a fish takes the hook, it can then be hauled in by hand.

IUU FISHING

Illegal, unreported and unregulated fishing. Often used interchangeably with a similar term "pirate fishing."

IUCN RED LIST

The world's most comprehensive inventory of the global conservation status of plant and animal species. It is widely considered to be the most objective and authoritative system for classifying species in terms of the risk of extinction. Classification groups are: Data Deficient, Least Concern, Near Threatened, Vulnerable, Endangered, Critically Endangered, Extinct in the Wild, or Extinct.



LOGLINERS

A type of fishing gear consisting of short lines carrying hooks, attached at regular intervals to a longer main line which is laid on the bottom or suspended horizontally with the help of surface floats. Main lines are up to 150 km long and can carry several thousand hooks. Commonly used for tuna.

MARINE RESERVES

Highly protected areas that are off-limits to all extractive and destructive uses, including fishing, and – put simply – are the marine equivalent of national parks on land. Wherever marine reserves have been implemented around the world they have been found to confer a range of conservation benefits and, in many places, benefits to fisheries as well. Greenpeace is advocating for a global treaty for the protection of 30% of the high seas by 2030.¹²⁸

POLE AND LINE

A fishing method in which surface schooling fish are attracted to a vessel and driven into active feeding behaviour by throwing live or dead bait into the water and spraying water onto the sea surface to simulate the escape of small prey. Poles and lines with barbless hooks are used to hook the fish which are pulled on board by manual or powered devices.

Also known as bait-boat fishing, this method is used worldwide to capture surface-schooling tuna such as skipjack and albacore.

PURSE SEINER

A method of fishing in which fish are encircled with a large 'wall' of net, which is then brought together to retain the fish by using a line at the bottom that enables the net to be closed like a purse. Commonly used to catch schooling fish such as tuna, mackerel, and herring.

TRANSSHIPMENT

Fishing vessels at sea transferring fish from one to another, often without any sort of observer coverage. This practice compounds the problem of the seafood chain of custody and makes tracing a product to its source extremely difficult. Progressive companies are abandoning transshipment in favor of more defensible and transparent protocols that allow them to stand behind their product.

TROLL

A trolling line consists of a line with natural or artificial baited hooks and is trailed by a fishing vessel. Several lines are often towed at the same time, by using outriggers to keep the lines away from the wake of the vessel.

ENDNOTES

- 1 Thailand, Indonesia and Philippines
- 2 China Mainland, Korea and Taiwan
- 3 The ILO Work in Fishing Convention No.188 (2007) entered into force in 2017, and boosts global efforts to ensure decent work for the world's 38 million workers in the fishing sector by setting the basic standards of decent work in the fishing industry. See <https://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS_596898/lang--en/index.htm> [Accessed 26 June 2020].
- 4 Galland et al., 2016. Netting billions: a global valuation of tuna. A report from the Pew Charitable Trusts. Pew Charitable Trusts. Available at: <<https://www.pewtrusts.org/en/research-and-analysis/reports/2016/05/netting-billions-a-global-valuation-of-tuna>> [Accessed 20 May 2020].
- 5 Levitt, T. 2016. Overfishing puts \$42bn tuna industry at risk of collapse. *The Guardian*. [online] 2 May. Available at: <<https://www.theguardian.com/sustainable-business/2016/may/02/overfishing-42bn-tuna-industry-risk-collapse>> [Accessed 20 May 2020].
- 6 Holmyard, M. 2016. 'One-by-one' fisheries gaining importance in USD 40 billion global tuna industry. *SeafoodSource*. [online] 28 June. Available at: <<https://www.seafoodsource.com/news/supply-trade/one-by-one-fisheries-gaining-importance-in-usd40-billion-global-tuna-industry>> [Accessed 20 May 2020].
- 7 Data generated using <<http://www.fao.org/fishery/statistics/global-capture-production/query/en>> [Accessed 23 June 2020] Only tunas and bonitos were used in query. Total tuna including mackerels is 7.256 million tons.
- 8 Data generated using Trade Map. 2020. Trade statistics for international business development. <<https://www.trademap.org/>> Accessed 5 February 2020].
- 9 Ibid.
- 10 Taiwan Fisheries Agency. 2020. Authorized Vessel List above 24 meter in IOTC. [online] Available at: <<https://www.fa.gov.tw/upload/437/2020060510031454522.pdf>> [Accessed 26 June 2020].
- 11 Greenpeace Southeast Asia. 2019. *Seabound: the journey to modern slavery in the high seas*. <https://www.greenpeace.org/southeastasia/publication/3428/seabound-the-journey-to-modern-slavery-on-the-high-seas/>
- 12 Simmons, G and C. Stringer. 2014. New Zealand's fisheries management system: Forced labour an ignored or overlooked dimension? In *Marine Policy Vol.50 Part A.December 2014*, pp. 74-80. [online] Available at <<https://www.sciencedirect.com/science/article/pii/S0308597X14001432>> [Accessed 18 May 2020].
- 13 International Labour Organization. 2013. *Caught at Sea: forced Labour and Trafficking in Fisheries International Labor Organization*, Geneva, ILO. http://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS_214522/lang--en/index.htm
- 14 Ibid. Footnote #6. page 3
- 15 Chiang, M. 2019. *Human rights at sea. Baseline study on the awareness and application of human rights in Taiwan's fishing industry*. Taiwan. Human Rights at Sea. [online] Available at: <<https://www.humanrightsatsea.org/2019/10/18/labour-abuse-taiwanese-fisheries-human-rights-baseline-study-published/>> [Accessed 22 June 2020]
- 16 Ibid.
- 17 Chase, C. 2019. EJF study finds child labor, illegal fishing issues within Vietnamese fleet. *SeafoodSource*. [online] 20 November. Available at: <<https://www.seafoodsource.com/news/supply-trade/ejf-study-finds-child-labor-illegal-fishing-issues-within-vietnamese-fleet>> [Accessed 18 May 2020].
- 18 Praxis Labs, 2019. *Tracking progress: assessing business responses to forced labour and human trafficking in the Thai seafood industry*. [pdf] Available at: <http://www.praxis-labs.com/uploads/2/9/7/0/29709145/09_hu_report_final.pdf> Accessed 18 May 2020].
- 19 Ibid. at page 4.
- 20 International Labour Organization. 2020. *Endline research findings on fishers and seafood workers in Thailand..* [pdf] Available at: <https://www.ilo.org/wcmsp5/groups/public/---asia/---ro-bangkok/documents/publication/wcms_738042.pdf> [Accessed 18 May 2020].
- 21 Ibid, at page III.
- 22 Ibid.
- 23 Praxis Labs, *supra* note 19 at page 6.
- 24 Praxis Labs, *supra* note 19 at page 5.
- 25 Praxis Labs, *supra* note 19 at page 5.
- 26 Jones, K., Visser, D., Prasetya, J., Nuriyati, D. (2019) *Fish for Export: Working in the Wild Capture Seafood Industry in Indonesia*, British Academy Tackling Slavery, Human Trafficking and Child Labour in Modern Business final report. Available at: <<https://pureportal.coventry.ac.uk/en/publications/fish-for-export-working-in-the-wild-capture-seafood-industry-in-i>> [Accessed 26 June 2020].
- 27 Ibid.

- 28 Thomson Reuters Foundation. 2020. *Thailand found failing to log fishermen's complaints of abuse and slavery*. 28 May. Available at: <https://news.trust.org/item/20200527231808-eou3r/> [Accessed 1 June 2020].
- 29 *Ibid.*
- 30 European Coalition for Corporate Justice. 2019. *UN Treaty on Business & Human Rights negotiations Day 1 - The round of discussions kicks off with an improved draft*. [online] Available at: <https://corporatejustice.org/news/16786-un-treaty-on-business-human-rights-negotiations-day-1-the-round-of-discussions-kicks-off-with-an-improved-draft> [Accessed 18 May 2020].
- 31 Swiss Coalition for Corporate Justice, 2020. *High Time for Swiss Referendum on the Responsible Business Initiative as Parliament Dumps Compromise Proposal*. [press release] 23 June 2020. Available at: <https://corporatejustice.ch/press-release/high-time-for-swiss-referendum-on-the-responsible-business-initiative-as-parliament-dumps-compromise-proposal/> [Accessed 26 June 2020].
- 32 Orłowski, A. 2019. FAO creating guidelines to combat human rights violations in fishing. *Seafood Source*. [online] 17 October. Available at: <https://www.seafoodsource.com/news/environment-sustainability/fao-creating-guidelines-to-combat-human-rights-violations-in-fishing> [Accessed 18 May 2020].
- 33 Bangkok Post. 2019. Thailand seeks clarity on scrapping of US trade preferences. [online] 26 Oct. Available at: <https://www.bangkokpost.com/business/1780229/trump-suspends-duty-free-trade-for-some-thai-goods> [Accessed 18 May 2020].
- 34 U.S. Customs and Border Protection, 2020. *CBP Issues Detention Order on Seafood Harvested with Forced Labor*. [press release] 11 May 2020. Available at: <https://www.cbp.gov/newsroom/national-media-release/cbp-issues-detention-order--harvested-forced-labor> [Accessed at 26 May 2020].
- 35 Global Fishing Watch <https://globalfishingwatch.org/> [Accessed 18 May 2020].
- 36 Global Fishing Watch. 2017. Joint Statement from the Republic of Indonesia and Global Fishing Watch, Inc. June 2017. Available at <https://globalfishingwatch.org/programs/indonesia-vms/indonesia-vms-joint-statement/> [Accessed 18 May 2020].
- 37 Spyglass - Global Fishing Crimes Map <https://spyglass.fish/> [Accessed 18 May 2020].
- 38 Orłowski, A. 2019. New tool helps fisheries enforcement track criminal fishing around the world. *SeafoodSource*. [online] 19 November. Available at: <https://www.seafoodsource.com/news/environment-sustainability/new-tool-helps-fisheries-enforcement-track-criminal-fishing-around-the-world> [Accessed 18 May 2020].
- 39 Global Initiative Against Transnational Organized Crime. 2019. *The Illegal, Unreported, and Unregulated Fishing Index*. [pdf] Available at: <https://globalinitiative.net/wp-content/uploads/2019/02/IUU-Fishing-Index-Report-web-version.pdf> [Accessed 18 May 2020].
- 40 Thai Union. 2017. *Greenpeace and Thai Union Summary of Agreement*. [pdf] Available at: <https://www.thaiunion.com/files/download/sustainability/policy/Thai-Union-Greenpeace-Summary-of-Agreement.pdf> [Accessed 19 May 2020].
- 41 Greenpeace International, 2020. *Thai Union's audit shows progress, but work still needed on many commitments - Greenpeace*. [press release] 19 May 2020. Available at: <https://www.greenpeace.org/international/press-release/43365/thai-union-audit/> [Accessed 5 June 2020].
- 42 Corporate Human Rights Benchmark. 2019. Available at: <https://www.corporatebenchmark.org/download-benchmark-data> [Accessed 19 May 2020].
- 43 Greenpeace USA. 2018. *Carting away the Oceans 10*. [pdf] Available at: <http://www.greenpeace.org/usa/wp-content/uploads/2018/08/Carting-Away-the-Oceans-10.pdf> [Accessed 19 May 2020].
- 44 World Benchmarking Alliance. 2019. *Seafood Stewardship Index*. Available at: <https://seafood.worldbenchmarkingalliance.org/rankings/> [Accessed 19 May 2020].
- 45 Oxfam, 2020. *Behind the Barcodes* [online]. Available at: <https://www.behindthebarcodes.org/en/> [Accessed 26 May 2020].
- 46 FishChoice, 2020. *Social Policy on the Protection of Human Rights in Fishery Improvement Projects: Draft* [pdf] 18 May 2020. Available at: <https://fisheryprogress.org/sites/default/files/FisheryProgress%20Draft%20Social%20Policy.pdf> [Accessed 26 June 2020].
- 47 FisheryProgress.org, 2020. *Social Policy*. [online] <https://fisheryprogress.org/how-use-site/social-policy> [Accessed 26 June 2020].
- 48 The UN FAO defines transshipment as the "act of transferring the catch from one fishing vessel to either another fishing vessel or to a vessel used solely for the carriage of cargo." See United Nations Food and Agriculture Organization. 1996. *FAO Technical Guidelines for Responsible Fisheries, No. 1*. [pdf] FAO, Rome. Available at: <http://www.fao.org/tempref/docrep/fao/003/W3591e/W3591e00.pdf> [Accessed 18 May 2020].
- 49 The International Labor Convention defines forced labor (or slavery) as "work or service exacted from any person under the menace of penalty and for which the person has not offered himself voluntarily." International Labour Organization. *C029 - Forced Labour Convention, 1930 (No. 29)*. Available at: http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C029 [Accessed 19 May 2020].

- 50 Ewell, E. et al. 2017. Potential ecological and social benefits of a moratorium on transshipment on the high seas. *In Marine Policy*. Vol. 81. July 2017. pp. 293-300. [online] Available at: <https://www.sciencedirect.com/science/article/pii/S0308597X17300623> [Accessed 19 May 2020].
- 51 Where an at-sea transshipment is allowed to occur, all vessels involved should be subject to the most comprehensive monitoring, control and surveillance measures so that it assists in decreasing the incidence of illicit and irregular transshipments. In such cases, Greenpeace advocates the following, though non exhaustive, conditions need to be met:
- No transshipments at sea of catches from overfished stocks
 - Public lists of vessels authorized to transship
 - Centralized Vessel Monitoring System
 - Real-time data reporting
 - Prior notification to relevant regulatory body
 - Observer coverage in both the transport and fishing vessel
 - Full transparency
 - Clear consequences for non-compliance, i.e. losing the authorization to transship in the future.
- 52 Sapin, R. and Cherry, D., 2020. Thai Union plant is source of coronavirus outbreak that sickened over 500, officials say. *IntraFish*, [online] 12 May. Available at: <https://www.intrafish.com/processing/thai-union-plant-is-source-of-coronavirus-outbreak-that-sickened-over-500-officials-say/2-1-807547> [Accessed 26 June 2020].
- 53 Undercurrent News, 2020. Thai Union plant in Portugal sends 200 workers home after COVID case. *Undercurrent News*, [online] 27 May. Available at: <https://www.undercurrentnews.com/2020/05/27/thai-union-plant-in-portugal-sends-200-workers-home-after-covid-case> [Accessed 26 June 2020].
- 54 Intrafish Media, 2020. Blumar confirms first coronavirus case in Chilean salmon processing plant. *Intrafish*, [online] 26 June. Available at: <https://www.intrafish.com/processing/blumar-confirms-first-coronavirus-case-in-chilean-salmon-processing-plant/2-1-784444> [Accessed 26 June 2020].
- 55 Evans, J., 2020. Chile's Camanchaca reports first coronavirus case. *IntraFish*, [online] 4 April. Available at: <https://www.intrafish.com/coronavirus/chiles-camanchaca-reports-first-coronavirus-case/2-1-788169> [Accessed 26 June 2020].
- 56 Aadland, C., 2020. Leroy plant gradually restarting salmon production after small number of workers test positive for coronavirus. *IntraFish*, [online] 22 April. Available at: <https://www.intrafish.com/processing/leroy-plant-gradually-restarting-salmon-production-after-small-number-of-workers-test-positive-for-coronavirus/2-1-795535> [Accessed 26 June 2020].
- 57 Cherry, D., 2020. High Liner suspends production at US plant after COVID-19 cases detected. *IntraFish*, [online] 20 April. Available at: <https://www.intrafish.com/processing/high-liner-suspends-production-at-us-plant-after-covid-19-cases-detected/2-1-794864> [Accessed 26 June 2020].
- 58 Sapin, R., 2020. Trident Seafoods workers test positive for coronavirus in Washington; company rolls out strict new measures for Alaska operations. *IntraFish*, [online] 17 April. Available at: <https://www.intrafish.com/coronavirus/trident-seafoods-workers-test-positive-for-coronavirus-in-washington-company-rolls-out-strict-new-measures-for-alaska-operations/2-1-793921> [Accessed 26 June 2020].
- 59 Mutter, R., 2020. Ocean Beauty worker is first reported case of Covid-19 at Alaska seafood facility. *IntraFish*, [online] 7 May. Available at: <https://www.intrafish.com/processing/ocean-beauty-worker-is-first-reported-case-of-covid-19-at-alaska-seafood-facility/2-1-804262> [Accessed 26 June 2020].
- 60 Fiorillo, J., 2020. Pacific Seafood reopening plant after Covid-19 shutdown. *IntraFish*, [online] 8 May. Available at: <https://www.intrafish.com/processing/pacific-seafood-reopening-plant-after-covid-19-shutdown/2-1-805775> [Accessed 26 June 2020].
- 61 Sapin, R., 2020. Bornstein Seafoods to reopen Oregon plant after coronavirus shutdown. *IntraFish*, [online] 12 May. Available at: <https://www.intrafish.com/processing/bornstein-seafoods-to-reopen-oregon-plant-after-coronavirus-shutdown/2-1-807601> [Accessed 26 June 2020].
- 62 Cherry, D., 2020. Seafood companies should make coronavirus cases public immediately. Here's why. *Intrafish*, [online] 15 May. Available at: <https://www.intrafish.com/opinion/seafood-companies-should-make-coronavirus-cases-public-immediately-heres-why-/2-1-809324> [Accessed 26 June 2020].
- 63 Undercurrent News, 2020. American Seafoods fights COVID-19 outbreak on factory trawler. *Undercurrent News*, [online] 1 June. Available at: <https://www.undercurrentnews.com/2020/06/01/american-seafoods-fights-covid-19-outbreak-on-factory-trawler/> [Accessed 26 June 2020].
- 64 Pal, I., 2020. 9 of 170 fishermen push Negros Oriental's COVID-19 tally from 2 to 11. *Inquirer.net*, [online] 1 June. Available at: <https://newsinfo.inquirer.net/1284479/9-of-170-fishermen-push-negros-orientals-covid-19-tally-from-2-to-11> [Accessed 26 June 2020].
- 65 Oxfam International, 2020. *Impacts of the COVID-19 Pandemic on Small-scale Producers and Workers: Perspectives from Thailand's Seafood Supply Chain*. [pdf] UK: Oxfam International. Available at: <https://www.business-humanrights.org/sites/default/files/documents/bn-impact-covid19-small-scale-producers-workers-220620-en%5B1%5D.pdf> [Accessed 26 June 2020].
- 66 *Ibid.*
- 67 *Western & Central Pacific Fisheries Commission, 2020. Commission Decision to extend the decisions in response to COVID-19 until 31 July 2020*. [online] 28 May. [Accessed 26 June 2020].

- 68 See Greenpeace Southeast Asia. 2018. *From Sea to Can: 2018 Southeast Asia Canned Tuna Ranking Report*. [pdf] Available at: <<https://www.greenpeace.org/southeastasia/publication/638/from-sea-to-can/>> [Accessed 19 May 2020].
- 69 Sala, E. et al. 2018. The economics of fishing in the high seas. In *Science Advances*. Vol. 4, no. 6, eaat2504. Available at: <<https://advances.sciencemag.org/content/4/6/eaat2504>> [Accessed 19 May 2020].
- 70 Kroodsma, D. et al. 2018. Tracking the global footprint of fisheries. In *Science* 359, 904-908. Available at: <<https://science.sciencemag.org/content/359/6378/904>> [Accessed 19 May 2020].
- 71 University of York, University of Oxford, and Greenpeace. 2019. 30x30: a blueprint for ocean protection. [online] Available at: <<https://www.greenpeace.org/international/publication/21604/30x30-a-blueprint-for-ocean-protection/>> [Accessed 19 May 2020].
- 72 Estimates using official 5 RFMO vessel registers: IATTC: <https://www.iattc.org/> CCSBT: <https://www.ccsbt.org/> ICCAT: <https://www.iccat.int/> WCPFC: <https://www.wcpfc.int/> & IOTC: <https://www.iotc.org>.
- 73 FAO. 2018. Global capture production 1950-2018. Available at: <<http://www.fao.org/fishery/statistics/global-capture-production/query/en>> [Accessed 26 June 2020].
- 74 *Ibid.*
- 75 Western & Central Pacific Fisheries Commission. 2019. *The Western and Central Pacific Tuna Fishery: 2018 Overview and Status of Stocks*. 2019 November 27. [online] Available at: <<https://www.wcpfc.int/node/44543>> [Accessed 19 May 2020].
- 76 Western & Central Pacific Fisheries Commission. 2020. *Vessels in the RFV by vessel type*. [online] Available at: <<https://www.wcpfc.int/vessels/charts/types>> [Accessed 27 June 2020].
- 77 IUCN. 2020. The IUCN red list of threatened species. [online] Available at: <<http://www.iucnredlist.org>> [Accessed 19 May 2020].
- 78 Collette, B., et al. 2011. *Thunnus alalunga*. *The IUCN Red List of Threatened Species* 2011: e.T21856A9325450. <https://dx.doi.org/10.2305/IUCN.UK.2011-2.RLTS.T21856A9325450.en>. Downloaded on 19 May 2020.
- 79 Collette, B., et al. 2011. *Thunnus albacares*. *The IUCN Red List of Threatened Species* 2011: e.T21857A9327139. <https://dx.doi.org/10.2305/IUCN.UK.2011-2.RLTS.T21857A9327139.en>. Downloaded on 19 May 2020.
- 80 Collette, B., et al. 2011. *Thunnus obesus*. *The IUCN Red List of Threatened Species* 2011: e.T21859A9329255. <https://dx.doi.org/10.2305/IUCN.UK.2011-2.RLTS.T21859A9329255.en>. Downloaded on 19 May 2020.
- 81 Collette, B., Fox, W., Juan Jorda, M., Nelson, R., Pollard, D., Suzuki, N. & Teo, S. 2014. *Thunnus orientalis*. *The IUCN Red List of Threatened Species* 2014: e.T170341A65166749. <https://dx.doi.org/10.2305/IUCN.UK.2014-3.RLTS.T170341A65166749.en>. Downloaded on 19 May 2020.
- 82 Collette, B., et al. 2011. *Katsuwonus pelamis*. *The IUCN Red List of Threatened Species* 2011: e.T170310A6739812. <https://dx.doi.org/10.2305/IUCN.UK.2011-2.RLTS.T170310A6739812.en>. Downloaded on 19 May 2020.
- 83 Collette, B., Chang, S.-K., Fox, W., Juan Jorda, M., Miyabe, N., Nelson, R. & Uozumi, Y. 2011. *Euthynnus affinis*. *The IUCN Red List of Threatened Species* 2011: e.T170336A6753804. <https://dx.doi.org/10.2305/IUCN.UK.2011-2.RLTS.T170336A6753804.en>. Downloaded on 19 May 2020.
- 84 Collette, B., Di Natale, A., Fox, W., Juan Jorda, M., Miyabe, N., Nelson, R., Sun, C. & Uozumi, Y. 2011. *Thunnus tonggol*. *The IUCN Red List of Threatened Species* 2011: e.T170351A6763691. <https://dx.doi.org/10.2305/IUCN.UK.2011-2.RLTS.T170351A6763691.en>. Downloaded on 19 May 2020.
- 85 Indian Ocean Tuna Commission, 2020. *Status Summary for Species of Tuna and Tuna-Like Species Under the IOTC Mandate, as well as Other Species Impacted by IOTC Fisheries*. [online] Available at: <https://iotc.org/science/status-summary-species-tuna-and-tuna-species-under-iotc-mandate-well-other-species-impacted-iotc> [Accessed 26 June 2020].
- 86 Western & Central Pacific Fisheries Commission, 2020. *Current Stock Status and Advice*. [online] Available at: <<https://www.wcpfc.int/current-stock-status-and-advice>> [Accessed 26 June 2020].
- 87 This category has historically been used to assess issues pertaining to nationality of crew and ownership of fishing vessels in a given State's territorial waters.
- 88 Marine Stewardship Council. Certificates and Traceability. *PT Citraraja Ampat, Sorong pole and line Skipjack and Yellowfin Tuna*. Available at: <<https://fisheries.msc.org/en/fisheries/pt-citraraja-ampat-sorong-pole-and-line-skipjack-and-yellowfin-tuna/@@certificates>> [Accessed 19 May 2020].
- 89 Republic of the Philippines Department of Labor and Employment. D.O. 156-16. 2016. [pdf] Available at: <http://bwc.dole.gov.ph/images/Issuances/DepartmentOrder/DO_156_16_WorkingandLivingConditionsOfFishersonboardFishingvesselsEngaged_Commercial-FishingOperation.pdf> [Accessed 26 June 2020].
- 90 Century Pacific Food Inc. *Purchases Assessment*. Available at: <<https://www.centurypacific.com.ph/sustainability/purchases>> [Accessed 26 June 2020].
- 91 D.O. 156-16., *supra* note 91.
- 92 D.O. 156-16., *supra* note 91.
- 93 Philbest Canning Corporation. *RDMG Code of Conduct for Procurement 2018*. [online]. Available at: <<http://www.philbest.com.ph/>> [Accessed 26 June 2020].
- 94 BSCI is a supply chain management system that supports companies to drive social compliance and improvements within the factories and farms in their global supply chains. See: <<https://www.amfori.org/content/amfori-bsci>>.
- 95 D.O. 156-16., *supra* note 91.
- 96 D.O. 156-16., *supra* note 91.

- 97 D.O. 156-16., *supra* note 91.
- 98 SeaValue. *Sustainable Seafood Procurement and Processing Policy*. [online] Available at: http://www.seavaluegroup.com/Sustainable_seafood_procurement_and_processing.html [Accessed 26 June 2020].
- 99 SeaValue. *Trace My Catch*. Available at: <http://www.seavaluegroup.com/tmc/> [Accessed 26 June 2020].
- 100 Siam Makro Public Limited Company. 2017. Human Rights and Labor Practices Company. [pdf] Available at: https://www.siammakro.co.th/pdf/Human-Rights-and-Labor-Practices-Policy_En.pdf [Accessed on 19 May 2020]
- 101 C.P. Group. 2016. *Force for a Sustainable Life: Sustainability Report 2016* at page 104 [pdf] Available at: https://www.cpgroupglobal.com/portals/0/pdf/CPG_EN_130917.pdf [Accessed 19 May 2020]; Siam Makro Public Limited Company Limited. iTrace. [online] Available at: <https://itrace.siammakro.co.th/itrace/traceinfo.aspx?MAKRO.DRYFD030476P191767MAKRO1041> [Accessed 19 May 2020].
- 102 Thai Union. *Annual Report: 2019*, at page 84. [pdf] Available at: <https://investor.thaiunion.com/misc/ar/20200318-tu-ar2019-en-01.pdf> [Accessed 26 June 2020].
- 103 Thai Union. *SeaChange*. Available at: <https://seachangesustainability.org/> [Accessed 26 June 2020].
- 104 Thai Union. *Sustainability Report and Policy*. Available at: <https://www.thaiunion.com/en/sustainability/policy> [Accessed 26 June 2020].
- 105 See e.g., *Chicken of the Sea* <https://chickenofthesea.com/trace/h5gyt-koh98> [Accessed 19 May 2020]; Sealect http://www.select.co.th/eat_different/can-tracker/ [Accessed 19 May 2020].
- 106 World Benchmarking Alliance. *Thai Union Group*. Available at: <https://seafood.worldbenchmarkingalliance.org/companies/thai-union-group/> [Accessed 26 June 2020].
- 107 Thai Union. 2020. *Guidance to the Thai Union Fishing Vessel Improvement Program and Code of Conduct* [pdf] Available at: <https://www.thaiunion.com/files/download/sustainability/policy/VIP-VCoC-Guidance-EN-01.pdf> [Accessed 26 June 2020].
- 108 *Ibid.* Sec. 10.1
- 109 Thai Union. *Whistleblowing*. Available at: https://investor.thaiunion.com/complaints_handling.rev/print/null.
- 110 Thai Union. *Complaint Channel and Process*. Available at: https://investor.thaiunion.com/complaint_policy.html.
- 111 Thai Union, 2015. *Policy Commitment to Ban Transshipment at Sea*. [pdf] Available at: https://www.thaiunion.com/files/download/sustainability/policy/POLICY_THAI_UNION_TRANSshipment_Sept_2015.pdf [Accessed 26 June 2020].
- 112 See Section 4 of: ISSF. *Conservation Measures & Commitments*. [online] Available at: <https://iss-foundation.org/what-we-do/verification/conservation-measures-commitments/> [Accessed 26 June 2020].
- 113 Thai Union, 2015, *supra* note 114.
- 114 Thai Union, 2020, *supra* note 110, at sections 2.7 & 2.8.
- 115 Ayam Brand. *Is My Ayam Brand Tuna Sustainable?* Available at: <https://www.ayambrand.com.my/about-us/sustainability.html> [Accessed 19 May 2020].
- 116 Denis Asia Pacific, 2018. *Denis Asia Pacific ESG report, Issue 3. July 2018 - June 2019*, at page 84. [pdf] Available at: <http://denisgroup.net/ESG-report/ESG-REPORT-ISSUE-3.pdf> [Accessed 19 May 2020].
- 117 *Ibid* at page 86.
- 118 Denis Group report. Available at: <http://dg-report.net/> [Accessed 19 May 2020].
- 119 SAFCOL Australia. 2018. *SAFCOL Sustainable Tuna Procurement Policy*. [pdf] Available at: <https://www.safcol.com.au/wp-content/uploads/2018/05/SAFCOL-Sustainable-Seafood-Procurement-Policy-2.pdf> [Accessed 20 May 2020].
- 120 Fish Information & Services. nd. Companies Directory - TCB. Available at: https://fis.com/fis/companies/details.asp?l=e&filterby=species=&country_id=&page=7&company_id=74936 [Accessed 21 May 2020].
- 121 Tropical Canning (Thailand) Public Company Limited, 2015. *Seafood Sustainability Policy*. [pdf] Available at: <https://www.tropical.co.th/files/policy/SeafoodsSustainabilityPolicyREV3.pdf> [Accessed 21 May 2020].
- 122 International Seafood Sustainability Foundation. *ProActive Vessel Register. About the PVR*. Available at: <https://iss-foundation.org/knowledge-tools/databases/proactive-vessel-register/> [Accessed 21 May 2020].
- 123 Tropical Canning (Thailand) Public Company Limited. 2020. *ISSF Conservation Measure 7.5 Purchases from PVR Vessels - Longline*. [pdf] 31 March. Available at: <https://www.tropical.co.th/files/policy/ISSFCM75.pdf> [Accessed 21 May 2020].
- 124 As defined by the International Labour Organization. See: <https://www.ilo.org/global/topics/decent-work/lang--en/index.htm> [Accessed 26 June 2020].
- 125 As defined by the International Labour Organization. See: <https://www.ilo.org/global/topics/decent-work/lang--en/index.htm> [Accessed 26 June 2020].
- 126 Greenpeace. *Bycatch – wasteful and destructive fishing*. Available at: <https://www.greenpeace.org.uk/what-we-do/oceans/overfishing/bycatch/> [Accessed 26 June 2020].
- 127 Lawson T (2012). Estimation of the species composition of the catch by purse seiners in the Western and Central Pacific Ocean using grab samples and spill samples collected by observers. Scientific Committee Eighth Regular Session, 7-15 August 2012, Busan, Republic of Korea. WCPFC-SC8-2012 / ST-WP-03 (Rev. 1). Available at: <https://www.wcpfc.int/node/3189> [Accessed 26 June 2020].
- 128 30X30: A Blueprint for Ocean Protection, *supra* note 72.



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