

*Testimony of Ame Sagiv
Senior Manager, Investments
Humanity United
Before the House Natural Resources Committee
Subcommittee on Water, Oceans, and Wildlife
United States House of Representatives*

Oversight of NOAA's Report on Illegal, Unreported, and Unregulated Fishing

November 14, 2019

Introduction

Mr. Chairman, Ranking Member McClintock, and distinguished members of the Subcommittee, thank you for holding this hearing on Illegal, Unreported, and Unregulated (IUU) fishing. And thank you for the opportunity to testify on one of the most important issues facing our global food supply today.

It is my pleasure to be here representing Humanity United and our partners around the world who work every day to combat forced labor and human trafficking in the seafood sector. Humanity United is a nonpartisan foundation dedicated to cultivating the conditions that transform human exploitation and violent conflict into enduring freedom and peace. We are part of The Omidyar Group, a diverse collection of organizations united by a common desire to catalyze social impact.

This hearing is an important opportunity to highlight the human cost of IUU fishing, and we welcome this Subcommittee's attention to the *Improving International Fisheries Management 2019 Report to Congress*. We were particularly pleased to see the section of the report on forced labor and human trafficking. Looking forward, we encourage this committee and the National Oceanic and Atmospheric Administration (NOAA) to work together to ensure that indicators of forced labor and human trafficking are incorporated into the country listing criteria for the next report.

In the United States, we are not shielded from the issues of forced labor or human trafficking in our seafood purchases simply because we have advanced, scientifically-supported fisheries management policies and practices. On the contrary, the overwhelming majority of our seafood is imported or reimported after processing—90% by NOAA's own figures¹—with as much as one-third of our wild-caught seafood imports estimated to have been harvested through IUU fishing practices.²

I think it is important to open this discussion with a key point that most Americans are likely not aware of. When we buy seafood that is not caught and processed in the U.S.—a likelihood, given the import number that I just mentioned—it is almost guaranteed that we are consuming seafood produced by IUU or forced labor³ somewhere along that journey from bait to plate or farm to fork. This is not a problem that we are distanced from: *it is in our everyday*.

Since 2010, Humanity United has worked to disrupt the system of exploitation in seafood supply chains, with particular emphasis on Thailand, as one of the world's largest seafood exporters.⁴ During that time, U.S. government attention to this issue has contributed to prompting an overhaul of the legal and regulatory framework in Thailand and a flurry of activity on the part of

¹ <https://www.fisheries.noaa.gov/national/aquaculture/us-aquaculture>

² <https://www.sciencedirect.com/science/article/pii/S0308597X14000918>

³ <https://advances.sciencemag.org/content/4/7/e1701833>

<https://www.nature.com/articles/s41467-018-07118-9>

⁴ <http://www.fao.org/3/I9540EN/i9540en.pdf> (see chart p. 55)

industry to institute better supply chain management practices.⁵ While much remains to be done in Thailand, particularly by way of good implementation, we see these reforms as helpful initial steps towards shifting long-held industry practices.

Through a cross-organizational collaboration with The Freedom Fund⁶ in the U.K., we have continued to focus on Thailand as the geography where we hope to disrupt the pervasive system of human trafficking and forced labor related to seafood production. Together, we provide funding for investigative journalism and research; civil society groups, both in Thailand and internationally; technical assistance to government; capacity building to businesses aiming to improve their practices; and direct advocacy. We engage regularly with government officials, businesses, civil society, technology innovators, academics, and other thought leaders. We also supported my fellow witness, Ian Urbina, in the development of his reporting into a fascinating book, “The Outlaw Ocean,” about the lawlessness taking place out on the oceans, particularly in areas outside the reach of any specific legal jurisdiction.

Environmental and labor abuses in the seafood industry are intractable, complex problems that mutually enable and reinforce one another—they are inextricably intertwined. For too long, the environmental and labor movements operated in silos. In recent years, it has been encouraging to see these two movements begin more regular coordination and collaboration, in recognition of the shared drivers and solutions within both issue areas. Having personally worked in the environmental movement at the Sierra Club and The Nature Conservancy for many years, it has been plain to me that this does not have to be an either/or proposition. In fact, if we do not deal with these twin issues as two sides of the same coin, we are bound to fail on both counts. We must think of the labor and the environmental issues as one complete package. Even in a world that is divided on many issues, we can all agree that we do not want human trafficking in our seafood any more than we want to see our precious marine resources degraded and reduced to nothing.

⁵ <https://www.undercurrentnews.com/2018/01/03/us-bill-would-accelerate-simp-deadline-for-shrimp-imports/>

⁶ Humanity United is one of the three founders of The Freedom Fund, a \$100 million donor collaborative dedicated to identifying and investing in the most effective frontline efforts to end slavery around the world.

Intersection of IUU and Forced Labor/Human Trafficking

The work that this Subcommittee is doing to oversee NOAA's efforts to ensure that our seafood supply chains are free of IUU fishing is of critical importance. Our oceans contain finite resources that are easily subject to overexploitation. Compounding and enabling that problem is the human suffering associated with harvesting and processing the catch. By the same token, it is possible, with good governance and careful scientific measures, to provide decent work and to carefully manage this precious global resource in a manner that allows fish stocks to sustainably provide sustenance to the nearly 4.3 billion of the world's population that rely on seafood as a source of protein.⁷

There is a hidden cost in the seafood supply chain, one that often delinks the mode of production and those who produce it from the end product itself. The labor and working conditions under which seafood is caught and processed directly correlate to facilitating either good practice or bad. The links between environmental and labor issues⁸ cannot be overstated, and we are heartened to see the *Improving International Fisheries Management* report beginning to reckon with this aspect of how seafood arrives on our plates.

Our oceans have changed dramatically since the 1950s. Into the middle of the 20th century, fish stocks were still relatively abundant and fishing methods were fairly traditional. Those in the business turned a fair profit. But a post-war boom enabled rapid industrialization⁹ of the commercial fleet and the deployment of more sophisticated technology—from engines to gear—causing a rush to sea. Over the intervening decades, we have seen overfishing quickly deplete fish stocks, forcing boats to fish further and further from shore, raising their fixed costs, and incentivizing a reliance on illegal practices—both environmental and labor.¹⁰

Regulation and oversight of this rapidly industrialized fleet is made all the more complicated by the fact that seafood supply chains are long, opaque, and highly distributed. As shown in the simplified supply chain map below,¹¹ seafood passes through many hands—and countless aggregators—before it finally arrives at our local grocer. Where industry oversight and governance are low, the ability and incentives to cut corners on ethical labor practices or to overlook environmental abuses are high.¹²

⁷ <http://www.fao.org/news/story/en/item/248479/icode/>

⁸ <https://fishwise.org/wp-content/uploads/2018/03/The-Links-between-IUU-fishing-human-rights-and-traceability.pdf>

⁹ https://www.researchgate.net/publication/315036743_The_Industrialization_of_Commercial_Fishing_1930-2016

<https://www.sciencedaily.com/releases/2019/09/190916160819.htm>

¹⁰ <https://www.sciencedaily.com/releases/2018/11/181107093807.htm>

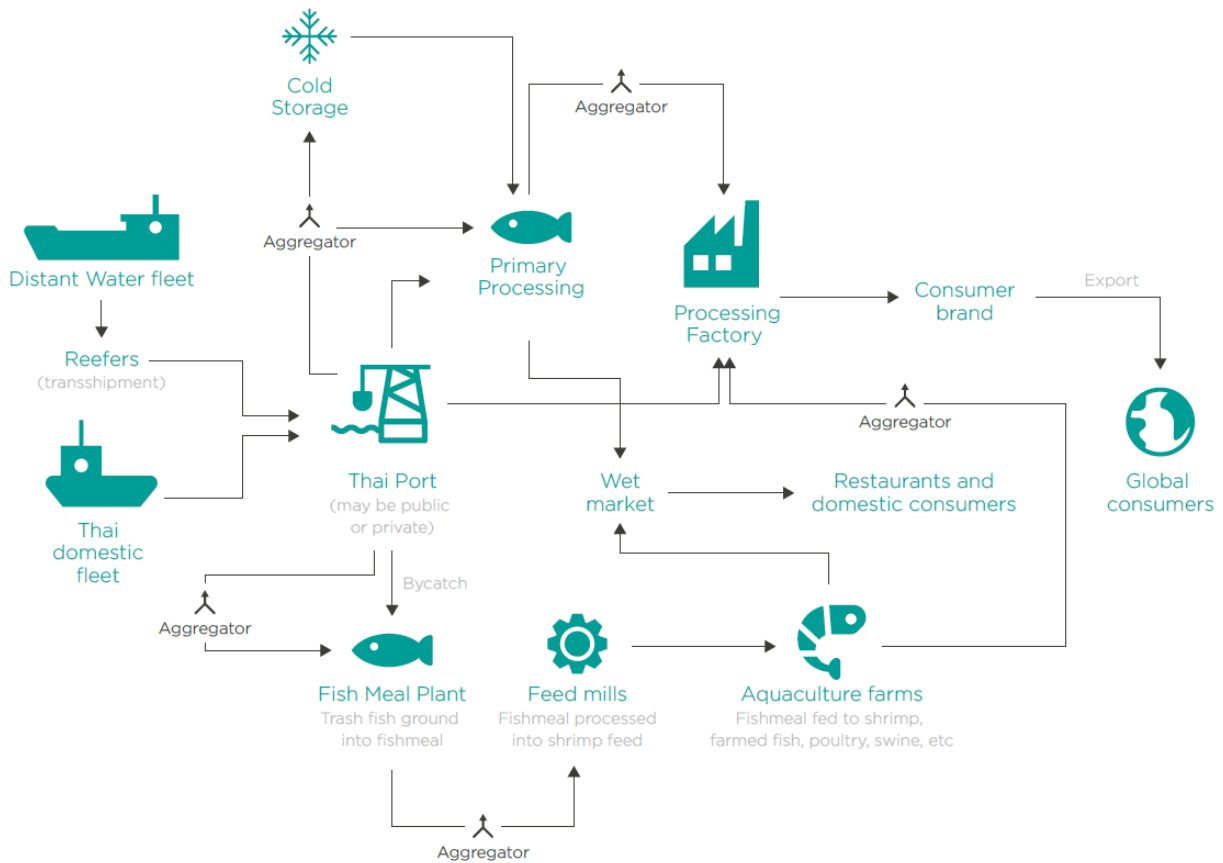
<http://www.fao.org/3/X8002E/x8002e04.htm>

http://www.earth-policy.org/books/pb3/PB3ch5_ss6

¹¹ This map was created for Humanity United as part of a forthcoming publication by Praxis Labs.

¹² <https://www.oceanfdn.org/sites/default/files/SlaveryandtheShrimponYourPlate1.pdf> (see e.g. p. 33)

SEAFOOD SUPPLY CHAIN MAP



Growing demand from Western markets and consumers has further incentivized the production of cheap seafood at scale.¹³ We cannot satisfy this demand via U.S. fisheries alone.¹⁴ As a result we rely on sourcing seafood abroad, particularly from Asia, where 85% of fishers and fish farmers are located and to which 75% of vessels are flagged¹⁵—with China holding the title of top exporter for many years. As American consumers increasingly rely on seafood for healthy dietary protein,¹⁶ it is important that the U.S. provides good import controls and oversight to help safeguard against labor abuses and bring greater transparency to these long and opaque supply chains.

Regulation and penalties, however, can't be limited only to supplying countries or producers if we fundamentally want to shift this dynamic. These problems involve the entire supply chain—

¹³ <https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=24228&LangID=E>

¹⁴ <https://blogs.scientificamerican.com/observations/its-time-to-be-honest-about-seafood/>

¹⁵ <http://www.fao.org/state-of-fisheries-aquaculture>

¹⁶ <https://www.seafoodnutrition.org/seafood-101/news/news-update-u-s-per-capita-seafood-consumption-up-in-2017/>

retail and consumer demand for cheap seafood in the U.S. is *part of* creating producer incentives to engage in IUU and labor abuse.¹⁷ But the onus should not be on consumers to fix—most consumers don’t have sufficient information, resources, or viable alternatives from which to choose.¹⁸ U.S. supermarkets must examine their buying practices and adapt to changes in the supply chain. There are also important trade tools that can help address these issues, protecting American workers and consumers from practices that no one wants to compete against or support in the marketplace.¹⁹

Addressing labor abuses in seafood production is an imperative, as it is pervasive across the industry. In fact, experts argue that forced labor in fishing is *the prevalent norm*, and the standard staffing model for fishing vessels.²⁰ In other words, forced labor is the typical labor condition in fishing. Seafood work in general is a “three-D” job: dirty, dangerous, and difficult. As another witness testified before this committee in May, “the seafood industry provides almost only poorly paid jobs in hazardous working conditions. It has a terrible record of human rights abuses, and there is massive use of child and forced labor.”²¹ Consequently, it is often the most vulnerable workers who are willing to take their chances onboard a fishing vessel in the hopes of lifting their families out of poverty. This is in no way meant to imply that every fisherman is trapped in forced labor—fishing is indeed an honorable, respectable profession. But as the world economy changes, the attractiveness of this industry to next generations²² has dropped and thus the work is falling more and more to vulnerable populations driven by need to take on precarious work.²³ Many of these vulnerable workers also become complicit in serious violations, unwittingly or simply from lack of choice, including shark finning.²⁴

These challenging conditions within the industry have caused ongoing and severe labor shortages. The result is that a large proportion of workers in fishing are migrants—in Thailand,

¹⁷ <https://fas.org/irp/nic/fishing.pdf>

<https://ejfoundation.org/resources/downloads/Blood-water-06-2019-final.pdf>

<https://www.americanprogress.org/issues/green/reports/2016/12/15/295088/seafood-slavery/>

¹⁸ <https://www.npr.org/sections/thesalt/2017/03/15/520023117/i-want-to-eat-fish-responsibly-but-the-seafood-guides-are-so-confusing>

¹⁹ <https://www.iuufishing.noaa.gov/Portals/33/SIMP.FactSheet.Rev2018.pdf?ver=2019-02-07-204941-770>

https://www.iuufishing.noaa.gov/Portals/33/noaa_taskforce_report_final.pdf

²⁰ <https://www.globallslaveryindex.org/2018/findings/importing-risk/fishing/>

²¹ <https://naturalresources.house.gov/imo/media/doc/J.Gearhart%20%20Testimony%20WOW%20v%20Hrg%2005.01.19.pdf>

²² <https://www.opb.org/news/article/oregon-washington-fishing-jobs-next-generation/>

²³ In the most general sense, precarious work is a means for employers to shift risks and responsibilities on to workers. It is work performed in the formal and informal economy and is characterized by variable levels and degrees of objective (legal status) and subjective (feeling) characteristics of uncertainty and insecurity. Although a precarious job can have many faces, it is usually defined by uncertainty as to the duration of employment, multiple possible employers or a disguised or ambiguous employment relationship, a lack of access to social protection and benefits usually associated with employment, low pay, and substantial legal and practical obstacles to joining a trade union and bargaining collectively.

https://www.ilo.org/wcmsp5/groups/public/---ed_dialogue/---actrav/documents/meetingdocument/wcms_179787.pdf

²⁴ <https://globalfishingwatch.org/news-views/an-ocean-with-neither-pirates-nor-slaves/>

<https://www.ft.com/content/de849e6e-b5ae-11e8-b3ef-799c8613f4a1>

that number is estimated to be as high as 82% of the 172,430 fishermen crewing Thai boats.²⁵ These workers, primarily from Myanmar, Cambodia, and Laos, often migrate informally and thus fall outside of the protection of the law.²⁶ The unfortunate fact is that many workers who migrate for work find themselves in trouble even *before* they've left home: it is not uncommon for unethical middlemen to charge workers exploitative fees in order to obtain a job, passing that debt along to the employer so that workers arrive on the job already in a state of heavy debt bondage.²⁷

Moreover, the fisherman's workplace—the vessels—prevent them from seeking help as they are sequestered far out at sea for extended periods of time. This isn't ameliorated when workers are on land: anti-migrant sentiments and language barriers keep workers socially ostracized, entirely unaware and unable to defend their rights, and fearful of police and other officials.²⁸ Lack of union rights, particularly in geographies like Thailand, further erode protections—"workers have no secure means to speak out and no support structure to protect them when they do."²⁹

This creates a perfect storm that enables unscrupulous vessel operators to offset the higher costs associated with overfishing at the expense of their one non-fixed cost: the workforce.³⁰ With low-wage or unpaid labor, vessels are able to go farther on ever-longer trips—and if captains aren't respecting labor laws, chances are they also aren't concerned about respecting environmental rules and restrictions.³¹

The Story of Soe

To better understand how easily vulnerable workers in search of an honest living can suddenly find themselves in a most helpless situation, I want to share the story of one such jobseeker. Soe left his village in Myanmar, hopeful of finding gainful employment in Thailand in order to help his family back home. Tricked and taken far out to sea, Soe was trapped—trafficked onto one of the country's notorious fishing vessels. The Foundation for Education and Development, one of our partners via The Freedom Fund, helped Soe after his escape and assisted him to return home. This is his story.

A few years ago, a broker smuggled Soe into Thailand from Myanmar along with six other friends. Soe thought he was being hired to work at a wood factory, but he didn't know that he'd been tricked. Forced labour and human trafficking are

²⁵ <https://www.ijm.org/documents/studies/IJM-Not-In-The-Same-Boat.pdf>

²⁶ <https://www.verite.org/wp-content/uploads/2019/05/Thailand-Bound-An-Exploration-of-Migration-Infrastructures-in-Cambodia-Myanmar-Lao-PDR-1.pdf>

²⁷ https://44f2713d-a205-4701-bba3-8d419653b4b6.filesusr.com/ugd/5bf36e_4620b33fdea7485382683dd927a97378.pdf

²⁸ https://shiptoshorerights.org/wp-content/uploads/ilo-shiptoshore_A4-EN_2018-02-23_web-v2.pdf (see particularly section 7, p. 39-42)

²⁹ <https://naturalresources.house.gov/imo/media/doc/J.Gearhart%20%20Testimony%20WOW%20ov%20Hrg%2005.01.19.pdf>

³⁰ <https://www.nytimes.com/2015/07/27/world/outlaw-ocean-thailand-fishing-sea-slaves-pets.html>

³¹ https://www.iuufishing.noaa.gov/Portals/33/noaa_taskforce_report_final.pdf
<https://eifoundation.org/resources/downloads/Blood-water-06-2019-final.pdf>

rampant in the Thai fishing industry, where migrant workers are often lured into situations of slavery aboard fishing vessels and in seafood processing plants. Soe was one of them. Freedom Fund partner Foundation for Education and Development (FED) provided him with basic care, shelter and food following his ordeal.

Soe's broker smuggled the young group to Songkhla, Thailand, after having slept overnight in a huge palm oil farm. In Songkhla, Soe and his friends were locked in a house and kept there for three days without being allowed to go outside. The broker had promised them employment at a wood factory making about \$10 per hour. Instead, they were taken to a pier where they were told that they'd be working aboard fishing boats.

Suffering from seasickness and backbreaking labour, Soe and his friends were forced to work on the boat for two years and eight days. During those years Soe wasn't paid, and he wasn't allowed to go ashore. Finally, an opportunity for Soe to escape presented itself when the boat reached Koh Samui, Thailand's second largest island. The boat stopped there to receive fish from another vessel. After loading the fish, Soe's boat anchored near the island. Under the cover of night, he and three other friends jumped off the boat and swam to the island, hiding in a coconut farm until the next day. They then met another Burmese man who worked on a small local fishing boat.

With the help of this man, they travelled back to mainland Thailand where they found employment aboard a different fishing boat. This time they earned money. However, Soe was found by the Thai authorities, and because he was in the country illegally, he was arrested and detained for two months.³²

This is one man's story—but it's important to note that he is one of likely *millions* like him on fishing vessels out there on our seas, catching our food.³³

Thailand: A Case Study

Thailand serves as a good microcosm for understanding how the intersection of human trafficking and environmental abuses plays out in practice in a specific geography. Thailand was, for many years, the third largest exporter of seafood in the world (recently overtaken by Vietnam), with exports valued at more than \$7 billion annually.³⁴ But this profitable industry, providing Americans and Europeans with a ready supply of cheap seafood, came at a high cost to the oceans and to hundreds of thousands of migrant workers.

³² <https://freedomfund.org/blog/soes-story/>

³³ <https://www.globalslaveryindex.org/2018/findings/importing-risk/fishing/>

³⁴ <http://www.fao.org/3/I9540EN/i9540en.pdf> (see chart p. 55)

Thailand's waters were once abundant, teeming with fish.³⁵ But as overfishing by the industrialized fleet³⁶ caused near-shore fish stocks to dwindle, boats were forced to fish further from shore, exacerbating already complex supply chains and increasing the likelihood of illegal fishing.³⁷ Over the course of little more than 50 years, Thailand found that the catch per unit effort—a measure of the kilograms of fish caught per hour—in the Gulf of Thailand had dropped from 297.8 kilograms per hour in 1961 to 18.22 kilograms per hour by 2013—a *drop of approximately 84%*.³⁸

Thailand's bustling seafood industry, including aquaculture and processing, now employs an estimated 650,000 people, with approximately 200,000 on fishing vessels.³⁹ With the industry's terrible reputation and with unemployment in Thailand hovering at less than 1%,⁴⁰ the majority of workers in the seafood industry are migrants, as described above. As far back as 2009, a survey of Cambodian long-haul fishermen conducted by the ILO found that nearly all of those surveyed reported beatings to the head and body, inhumane working hours, and sleep and nutritional deprivation.⁴¹ Another study found that *over half* of fishermen reported witnessing the murder of a crew member by the boat's captain.⁴² Geographically isolated at sea and socially isolated within Thai culture, these workers are extremely vulnerable, with little means for escape or assistance. And this is how labor abuses perpetuate IUU fishing: with an exploitable labor force, Thai vessels were able to continue to fish at the same unsustainable levels as before, maintaining profitability by relying on the de facto subsidy of forced labor.

In the years since the news of human trafficking in Thailand's seafood sector broke, and with this huge economic engine at stake in part due to diplomatic pressures from the US⁴³ and the EU,⁴⁴ the Royal Thai Government made significant changes to the legal and regulatory framework. These changes include:

- Ratification of the International Labour Organization's Protocol 29, Forced Labour Convention⁴⁵ (First country in Asia to ratify.)
- Ratification of the International Labour Organization's Convention 188 Work in Fishing Convention⁴⁶ (First country in Asia to ratify.)

³⁵ <http://www.searoundus.org/doc/publications/wp/2015/Teh-et-al-Thailand.pdf> and <https://www.frontiersin.org/articles/10.3389/fmars.2017.00402/full>

³⁶ <https://www.theguardian.com/environment/2016/jan/19/overfishing-causing-global-catches-to-fall-three-times-faster-than-estimated>

³⁷ <https://www.theguardian.com/environment/2015/apr/21/eu-threatens-thailand-with-trade-ban-over-illegal-fishing>

³⁸ <https://eifoundation.org/resources/downloads/EJF-Thailand-Seafood-Slaves-low-res.pdf>, (see chart p. 27)

³⁹ <https://www.nytimes.com/2014/06/22/opinion/sunday/thai-seafood-is-contaminated-by-human-trafficking.html>

⁴⁰ <https://www.statista.com/statistics/332222/unemployment-rate-in-thailand/>

⁴¹ https://www.ilo.org/global/topics/forced-labour/WCMS_143251/lang--en/index.htm

⁴² <https://eifoundation.org/reports/thailands-seafood-slaves>

⁴³ <https://2009-2017.state.gov/j/tip/rls/tiprpt/countries/2014/226832.htm>

⁴⁴ https://europa.eu/rapid/press-release_IP-15-4806_en.htm

⁴⁵ https://www.ilo.org/global/standards/information-resources-and-publications/news/WCMS_631435/lang--en/index.htm

⁴⁶ https://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS_666581/lang--en/index.htm

- Laws to allow fishers access to the Workmen’s Compensation Fund and social security benefits⁴⁷
- Reform of recruitment and migration management, including a new MOU with Myanmar for recruitment of fishers⁴⁸
- New regimens of Monitoring, Control, and Surveillance (MCS), with Vessel Monitoring Systems (VMS) required on all boats larger than 30 gross tons, and multi-disciplinary teams managing a Port-In/Port-Out system of vessel inspections⁴⁹

Thailand demonstrated great leadership in making these reforms, particularly over the opposition of powerful business interests. Significant challenges remain, however. Strong implementation remains elusive. Dangerous gaps in the legal framework remain, notably the right for migrants to lead and form unions.⁵⁰ This is especially important for a sector that is largely populated by migrant workers, for whom freedom of association and collective bargaining are effectively prohibited.⁵¹ Furthermore, formulation of domestic laws (corollary to ratified ILO conventions) has been met with concern from civil society, which has felt that the legislation was not strong enough and included too many loopholes, vague clauses that do not specify how these mandated rights would be accessed, and inadequate enforcement mechanisms.⁵² There have been unintended consequences of reforms too, most notably an increase in debt to employers in part due to costs associated with regularization of undocumented workers during amnesty periods.⁵³

Important progress has been made in Thailand; cooperation between forward-leaning government officials, industry leaders, and civil society has been key to this progress, and will remain a critical component to ongoing improvements.⁵⁴ Attention to gaps in law and weaknesses in implementation can help Thailand become a model of industry reform, if these issues are prioritized and enabling factors are taken seriously.

How does this all relate back to issues related to IUU fishing and the labor conditions that exacerbate them? There have been prominent examples of IUU and labor issues being addressed in concert, including the use of diplomatic tools that have been quite effective in pushing change at the country level. The EU’s issuance of a yellow card on Thailand, while formally an IUU tool, informally incorporated requests to address the labor issues extant in the industry. Both those advocating for Thailand’s yellow-carding and those subject to the associated threats of exclusion from the lucrative European markets agree: the yellow card was one of the single-most impactful strategies galvanizing change in Thailand—even to this day,

⁴⁷ <http://www.oic.go.th/FILEWEB/CABINFOCENTER2/DRAWER056/GENERAL/DATA0000/00000089.PDF>

⁴⁸ <http://www.mfa.go.th/main/en/news3/6886/95148-Thailand-uses-MOU-system-to-recruit-migrant-worker.html>

⁴⁹ <https://ejfoundation.org/resources/downloads/RTG-policy-recommendations-progress-spring-2019.pdf>

⁵⁰ <https://aflcio.org/2019/10/28/egregious-worker-rights-violations-cause-thailand-lose-trade-benefits>

⁵¹ https://shiptoshorerights.org/wp-content/uploads/ilo-shiptoshore_A4-EN_2018-02-23_web-v2.pdf

⁵² <https://www.reuters.com/article/us-thailand-fishing-lawmaking/warnings-over-new-law-to-protect-workers-in-thai-fishing-industry-idUSKCN1ST1OB>

⁵³ <https://www.reuters.com/article/us-thailand-migrants-slavery/new-rules-new-debts-slavery-fears-rise-for-migrant-workers-in-thailand-idUSKCN1VK006>

⁵⁴ <https://www.reuters.com/article/us-thailand-workers-trafficking/titans-of-thai-fishing-collaborate-to-tackle-slavery-idUSKBN1WP05W>

after the card has been lifted.⁵⁵ This is why the kind of import controls that this Subcommittee oversees and that NOAA implements are so important. When governments and policymakers—U.S., E.U., and Thailand itself—made seafood industry reform a priority, *change occurred*.

Recommendations for next steps

Fortunately, there are plenty of measures that this Subcommittee can take up today to address the problems associated with IUU fishing and labor abuse:

1. Ensure that NOAA: incorporates issues of forced labor and human trafficking in the seafood supply chain into applicable NOAA authorities and related agency authorities; adopts best practices and indicators to detect forced labor and human trafficking; and participates in the interagency process for coordination on forced labor and human trafficking. Require that the agency seeks input from human trafficking survivors, civil society organizations, and experts, and include information on the relation between IUU and human trafficking and forced labor as they develop these processes and practices.
2. The SIMP (Seafood Import Monitoring Program) is an important tool. To achieve its potential, the Administration should work with Congress to ensure that this program is properly resourced. Looking forward, SIMP should be expanded to include all species and to incorporate key data requirements to monitor labor. To realize the potential of expansion, NOAA must make SIMP a priority by devoting capacity and attention to the program and Congress must continue to make SIMP a priority by devoting needed resources and attention to this important area.
3. Clarify IUU definitions to ensure agencies are using the strongest definition possible across the U.S. Government and have the strongest mandate to address human trafficking and forced labor.
4. Amend the Trafficking Victims Protection Act to add the Secretary of Commerce to the President's Interagency Task Force to Monitor and Combat Trafficking.

Conclusion

Environmental and labor issues are inextricably linked: the drivers and solutions to one are intricately bound to the drivers and solutions to the other. For this reason, the issues surrounding forced labor and IUU must be addressed in tandem: otherwise, we will most certainly fail to address either over the long term. Ultimately, solutions to these issues are built on the same scaffolding: some of the same measures required to improve supply chain oversight—traceability, vessel monitoring, supply chain mapping—will bring a level of supply chain transparency that will benefit both environmental and labor conditions. Even the most stalwart environmental organizations now incorporate work on labor issues into their core mandates, recognizing that they must also address the worker exploitation that enables IUU fishing.

⁵⁵ <https://eifoundation.org/news-media/2019/thai-government-pledges-to-protect-reforms-to-keep-country-free-of-illegal-fishing>
<https://www.seafoodsource.com/news/environment-sustainability/despite-pressure-from-domestic-fishing-groups-thailand-pledges-to-continue-reforms-on-iuu-fishing-forced-labor>

It has been extremely encouraging to see examples of civil society, business, and the federal government recognizing the need to tackle these issues together. With the *Improving International Fisheries Management 2019 Report to Congress*, we are seeing NOAA acknowledge the need to address labor abuses and human trafficking in the fishing sector, alongside issues of IUU fishing. As the report also highlights, the Department of Justice has been convening a large interagency task force focused on human trafficking on fishing vessels. We stand ready to deepen the conversation and work with you to ensure that IUU fishing and labor issues are mutually addressed. We very much appreciate the measures that this Subcommittee has taken to exercise oversight of NOAA's report on IUU.

In closing, I want to note that we are all *part* of these supply chains, and this deeper insight into how these systems operate should make us only more acutely attuned also to those who labor within it. We have an opportunity to move these issues forward, towards better practice for people and planet. When we sit down to eat, we cannot forget the millions of workers like Soe who catch and produce our food. We cannot simply brush off the suffering in our supply chains; we can take this as an opening to act to help protect our food supply, not just from IUU fishing but from forced labor—a practice that is also illegal, unreported, and unregulated.

Thank you, Mr. Chairman, and members of the Subcommittee, for all the work you have done to ensure that the U.S. Government continues to be a leader in the fight to end IUU and human trafficking in our food supply and across the globe. And thank you again for the opportunity to testify before you today.