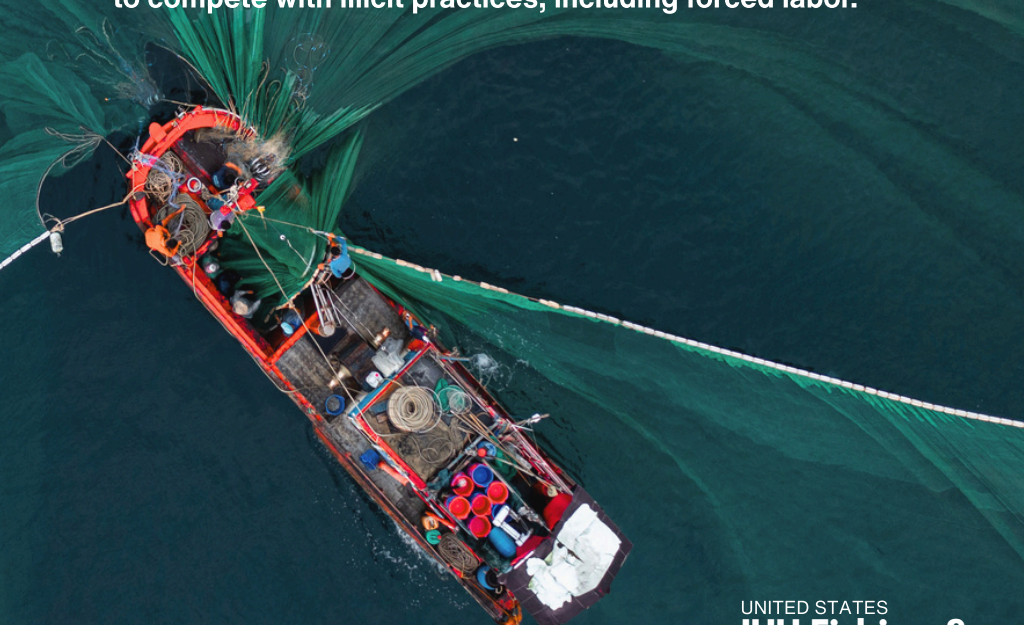


# A SHARED CRISIS AT SEA

## IUU fishing, forced labor, and U.S. policy solutions

### ILLEGAL SEAFOOD FOR DINNER IN THE U.S.

- An estimated **1 in 5 wild-caught fish comes from illegal, unreported, and unregulated (IUU) fishing**—practices that include forced labor—generating up to \$36.4 billion in illegal profits each year [1].
- The U.S. is the single largest country importer of seafood by value, with **imports accounting for up to 90% of U.S. seafood consumption** [2].
- Illegally sourced and fraudulently labeled seafood imports undercut law-abiding U.S. fishing businesses by **forcing them to compete with illicit practices, including forced labor.**



# WHAT IS IUU FISHING?

- **Illegal fishing is any fishing activity that violates laws and regulations, including the use of forced labor.** Violations include fishing without a permit, catching protected species, ignoring catch limits, using prohibited fishing gear, or fishing in closed areas—practices that violate human rights, threaten marine ecosystems and steal fish from legal fishers.
- **Unreported fishing occurs when fishing vessel operators misreport or fail to report their fishing activity and catch to relevant authorities.** This undermines fishery management and enables unsustainable harvest.
- **Unregulated fishing includes fishing for unmanaged species or in unmanaged areas.** It often occurs on the high seas—where regulations or management measures are largely absent.

# FORCED LABOR IN SEAFOOD SUPPLY CHAINS

- Forced labor is a **human rights violation and an unfair trade practice that undercuts law-abiding companies** around the world, including U.S. businesses. Goods made with forced labor are prohibited from being imported into the U.S.
- **At least 128,000 fishermen face forced labor globally** [3]—including an estimated 20% of migrant fishers from Southeast Asia [4]—enduring deception, violence, coercion, and abuse on vessels that remain at sea for up to two years, far from any government oversight.
- **Fishers experience intense isolation while at sea, compounded by lack of access to Wi-Fi**, which undermines their ability to communicate with families, unions, or authorities, to organize and bargain collectively, and to report abuses or seek medical care and remedy for labor violations.

# IUU FISHING AND FORCED LABOR INTERSECT

- IUU fishing and forced labor are deeply intertwined—forced labor is itself illegal, making its use on fishing vessels a form of IUU fishing by definition. The 2025 Trafficking in Persons Report [5] documents how **IUU fishing practices intersect with and fuel forced labor, allowing seafood tainted by abuse to enter global markets.**
- **These issues share key drivers:** insufficient transparency on vessel ownership and catch origins; transboundary operations that create enforcement gaps; weak governance and inconsistent enforcement of existing laws; and a business model where demand for cheap seafood can squeeze prices in ways that put both workers and marine ecosystems under pressure.
- There are **more than 100,000 fishing-related deaths per year**, and IUU fishing practices are a driver of the sector's alarmingly high death rate [6]. Workers aboard vessels that engage in IUU fishing practices often face debt bondage, document confiscation, physical violence, and grueling conditions with no recourse [7].

## NOTES

1. Fiore, Gina, and Peter Horn. 2023. "6 Facts You May Not Know About Illegal, Unreported and Unregulated Fishing." Pew.
2. FAO. 2025. "World Fish Trade Fall in 2024"; NOAA Fisheries. 2025. "International Trade Organizations."
3. ILO, Walk Free, and IOM. 2022. "Global Estimates of Modern Slavery"
4. Harkins, Benjamin, Daniel Lindgren, and Dewi Ratnawulan. 2026. "Toward Fair Seas." ILO.
5. U.S. Department of State. 2025. "2025 Trafficking in Persons Report."
6. Pew. 2022. "More Than 100,000 Fishing-Related Deaths Occur Each Year, Study Finds."
7. U.S. Customs and Border Protection. 2025. "Illegal, Unreported, and Unregulated Fishing."
8. Simeone, John C. 2026. "U.S. Imports of Fish and Seafood: An Evaluation of Coverage under the U.S. Seafood Import Monitoring Program." U.S. IUU Fishing & Labor Rights Coalition.
9. NOAA Fisheries. 2024. "Action Plan to Improve the U.S. Seafood Import Monitoring Program."
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11. In an ongoing case, plaintiffs have sued Bumble Bee Foods alleging forced labor on a fishing vessel. See: Cohen Milstein. 2025. "Bumble Bee Foods Longline Fishing TVPRA Litigation."

# RECOMMENDATIONS

## **Strengthen seafood traceability:**

- Effective enforcement depends on traceability (knowing where seafood comes from and who caught it). NOAA's Seafood Import Monitoring Program (SIMP) only covers 13 species and species groups, representing roughly 40% of U.S. seafood imports [8].
- NOAA Fisheries should fully implement the SIMP Action Plan [9], including expanding species coverage to all seafood, requiring prior notification of SIMP data to enable proactive enforcement, and collecting additional data elements that help detect risks of forced labor and labor abuse.

## **Block imports of seafood derived from IUU fishing and/or forced labor:**

- Section 307 of the Tariff Act prohibits the import of goods made with forced labor and the Uyghur Forced Labor Prevention Act (UFLPA) establishes a rebuttable presumption that goods from China's Xinjiang region are made with forced labor. Seafood is a priority sector for the UFLPA. Customs and Border Protection (CBP) enforces the Section 307 prohibition through Withhold Release Orders (WROs) and Findings that block or seize products at the border.
- Enforcement of both laws remains far short of what the scale of the problem demands. CBP and other relevant agencies should robustly enforce these laws and prioritize investigations that would address the systemic nature of forced labor in seafood.
- NOAA's current definition of IUU fishing leaves significant gaps in the government's ability to act against IUU fishing in other maritime jurisdictions. The U.S. should adopt a comprehensive definition covering all Regional Fisheries Management Organizations, the high seas, labor violations, and all maritime jurisdictions—and enforce import restrictions under the High Seas Driftnet Fishing Moratorium Protection Act against nations repeatedly identified for IUU fishing without taking corrective action.

## **Advance workers' rights:**

- As highlighted by the Department of State [10], effective prevention of forced labor depends on advancing core labor rights, including freedom of association, collective bargaining, access to grievance mechanisms, and the remediation of labor abuses. Ensuring fishers have free and secure Wi-Fi access at sea is essential to enabling them to exercise these rights.
- The State Department annually ranks 188 governments on their efforts to combat human trafficking and forced labor—an important diplomatic tool for advancing core labor rights abroad. The Department's Office to Monitor and Combat Trafficking in Persons must be reauthorized to ensure continued U.S. leadership in combating human trafficking globally.
- The International Labor Affairs Bureau (ILAB) of the Department of Labor publishes a biennial report identifying goods produced with forced labor, including seafood from seven countries. Historically, they have also provided technical assistance to support workers' rights globally. ILAB's programs to fight forced labor globally must continue to be supported and funded.

## **Punish bad actors:**

- The Trafficking Victims Protection Reauthorization Act (TVPRA) establishes criminal and corporate liability for forced labor in supply chains and provides victims with a private right of action [11]. The Department of Justice should use its powers to prosecute labor crimes in U.S. supply chains.
- Global Magnitsky Sanctions allow the Treasury Department to sanction individuals, companies, and entities implicated in corruption or serious human rights abuses. Sanctions were levied against two seafood companies in 2022.

# Protecting Oceans. Standing with Workers.

We are a coalition of civil society organizations working to address the intersection of illegal, unreported, and unregulated (IUU) fishing and labor rights abuses, including forced labor, in seafood supply chains. IUU fishing not only drives labor exploitation, but also contributes to overfishing, destroys essential ecosystems, and threatens global food security.

We leverage U.S. government mechanisms to promote policy change that addresses the dual human rights and environmental implications of IUU fishing. Our Coalition promotes real-time coordination among civil society, government, and the private sector, as well as with major seafood importers and exporters, to tackle the complex, multifaceted, and inherently linked challenges of IUU fishing and labor rights abuses in seafood supply chains. We advocate for strengthening traceability and transparency in seafood supply chains and for the robust enforcement of laws to prevent the U.S. from importing seafood produced with forced labor or other IUU fishing practices. We advance approaches for preventing labor abuse that are worker-centered and rooted in workers' fundamental rights to freedom of association and collective bargaining.

<https://www.iuufishing-laborrights.org>

UNITED STATES  
**IUU Fishing &  
Labor Rights**  
COALITION