

IMPOSSIBLY CHEAP

Abuse and Injustice in Bangladesh's Shrimp Industry



A report produced by EJP supported by Humanity United



Protecting People and Planet



Protecting People and Planet

The Environmental Justice Foundation is a UK-based environmental and human rights charity registered in England and Wales (1088128).

EJF

1 Amwell Street
London, EC1R 1UL
United Kingdom
www.ejfoundation.org

Comments on the report, requests for further copies or specific queries about EJF should be directed to info@ejfoundation.org

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By thanking Humanity United we in no way imply their endorsement of the report or its findings.

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Cover photo – © Philip Gain/SEHD

OUR MISSION

To Protect People and Planet

EJF believes environmental security is a human right.

EJF strives to:

- Protect the natural environment and the people and wildlife that depend upon it by linking environmental security, human rights and social need
- Create and implement solutions where they are needed most – training local people and communities who are directly affected to investigate, expose and combat environmental degradation and associated human rights abuses
- Provide training in the latest video technologies, research and advocacy skills to document both the problems and solutions, working through the media to create public and political platforms for constructive change
- Raise international awareness of the issues our partners are working locally to resolve

Our Oceans Campaign

EJF's Oceans Campaign aims to eradicate Illegal, Unreported and Unregulated (IUU) or 'pirate' fishing. We are working to create full transparency and traceability within seafood supply chains and markets. We actively promote improvements to policy-making, corporate governance and management of fisheries along with consumer activism and market-driven solutions.

Our ambition is to secure truly sustainable, well-managed fisheries and with this the conservation of marine biodiversity and ecosystems and the protection of human rights.

EJF believes that there must be greater equity in global fisheries to ensure developing countries and vulnerable communities are given fair access and support to sustainably manage their natural marine resources and the right to work in the seafood industry without suffering labour and human rights abuses.

We believe in working collaboratively with all stakeholders to achieve these goals.

For further information visit


www.ejfoundation.org/shrimp

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EXECUTIVE SUMMARY

- The global shrimp industry was worth more than US\$16.7 billion in 2010, making shrimp the most valuable fisheries product in the world, accounting for approximately 15 per cent of the total value of internationally traded seafood products that year.^{1/2}
- In addition to wild caught, shrimp is farmed primarily in Asia and Latin America, with Asian countries representing 78 per cent of global shrimp production in 2009.³
- Bangladesh is among the top 10 exporters of farmed shrimp in the world. Shrimp is its second largest foreign currency earner after the ready-made garment industry.^{4/5}
- Consumer demand in more developed countries has driven the expansion of Bangladesh's shrimp industry, with approximately 97 per cent of shrimp produced for export to foreign markets.⁶ Over two thirds of shrimp exports are imported by the EU, notably by Belgium, the UK and the Netherlands.⁷
- Bangladesh remains one of the poorest countries in the world, with more than 75 per cent of the population (approximately 131.5 million people) living on less than US\$2 a day, while more than 40 per cent live on less than US\$1.25.⁸
- The Environmental Justice Foundation's (EJF) investigations have traced the Bangladesh shrimp supply chain, 'from fry to fork', and this report presents a detailed, step-by-step account of the economic, labour and social issues that plague the industry.
- Through recorded interviews with fry collectors, shrimp farmers, depot owners and processing plant workers, EJF has identified sub-standard or exploitative working conditions at all stages of the supply chain, as well as examples of forced labour as defined by the International Labour Organization (ILO).⁹ These include hazardous working conditions, the use of child labour, bonded labour, withholding of pay, excessively low wages, health and safety violations, restricted union activities, verbal abuse and excessive hours.
- These labour abuses can be linked to global demand – particularly from the EU and US – for a plentiful supply of cheap shrimp and the rapid expansion of the shrimp industry that this demand has driven.
- The industry's development has resulted in significant regulatory gaps – with the majority of the sector unregistered and informal – a lack of transparency in the supply chain and human rights and labour violations frequently reported.¹⁰
- The rapid growth of the industry has also led to the unregulated seizure and conversion of traditional farm land to shrimp aquaculture, putting food security at risk and leaving many of the country's most vulnerable people without alternative livelihoods. Shrimp farming has been described as "good for the rich and bad for the poor", particularly with regard to food security.¹¹
- This report presents evidence that shrimp imported from Bangladesh for distribution and sale within the EU and US has been produced under exploitative conditions.
- EJF's findings contribute to a growing body of evidence detailing labour and human rights abuses in Bangladesh's shrimp industry.^{12/13/14}
- Shrimp can only be exported to the EU or US if it complies with their respective legal requirements. These requirements are almost exclusively concerned with food safety, hygiene and avoiding risk to consumer health, with little consideration made to labour and human rights conditions in the supply chain.
- To bring about the development of socially equitable and environmentally responsible shrimp farming, strategic and long-term commitment is needed across the industry by all stakeholders. Changes to the structure, management and regulation of the industry could allow more of Bangladesh's poor and marginalised communities to share in the prosperity the shrimp industry can bring.
- Greater transparency and accountability across the industry is urgently needed if shrimp is to become the path to development and wealth it has the potential to be.

A person is wading in shallow water, pulling a fishing net. A boat is visible in the background. The scene is set in a body of water with a distant shoreline and trees under a bright sky.

The global shrimp industry was worth more than
US\$16.7 billion
in 2010

Shrimp
accounts for
15%
of the total value
of globally traded
seafood products

INTRODUCTION

Shrimp is the world's most valuable seafood commodity, with the majority of demand coming from European, US and Japanese markets.¹⁵ Its high value has encouraged the growth of aquaculture in order to supplement wild fisheries and gain an increasing share of this \$16.7bn global industry.¹⁶ The majority of expansion in shrimp aquaculture – often referred to as 'The Blue Revolution' – has been primarily concentrated in developing countries, where the sector grew more than seven times faster than in developed countries in the three decades from 1970 to 2000.¹⁷ The 'comparative advantage' provided by factors such as low labour and land costs has resulted in the continued and rapid expansion of shrimp aquaculture throughout Asia and Latin America.¹⁸ This growth has led to the often unregulated seizure and conversion of traditionally agricultural land to shrimp farming, putting food security at risk and leaving many of the country's most vulnerable people without alternative livelihoods. Shrimp farming has been described as "good for the rich and bad for the poor" particularly with regard to food security.¹⁹

In 1990, seven countries – China, Thailand, Vietnam, Indonesia, Ecuador, India and Bangladesh – were responsible for 84 per cent of the 680,255 tonnes of shrimp cultivated worldwide; by 2009, Asian countries alone accounted for 78 per cent of global shrimp production, which exceeded 3.5 million tonnes.²⁰

High demand for shrimp as a cheap, low fat, high protein source of food has driven an industry that has often outpaced the development of environmental and labour standards in producer countries.²¹ Child, forced and bonded labour has been observed in almost all producing countries, along with land grabbing, forceful relocations and torture.^{22/23/24} Shrimp farming has also been associated with significant environmental damage, including the large-scale conversion of ecologically sensitive and important wetland areas and farmland.^{25/26} Land conversion of mangroves for shrimp aquaculture has been publicly condemned by the United Nations Environment Programme (UNEP), which stated that "where vast tracts of mangroves have been cleared for shrimp aquaculture, fast profits often left a legacy of long-term debts and poverty, which are hard to reverse."²⁷

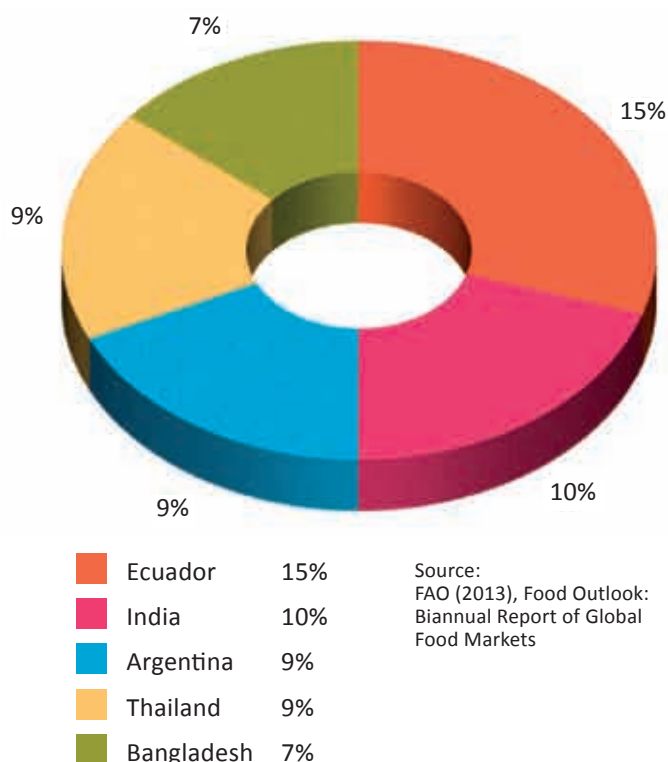
The European Union is the world's most valuable seafood market and a major importer of shrimp with the EU importing more than 590,000 tonnes of shrimp from countries outside of the EU in 2012.²⁸ Newly emerging countries make up the overwhelming majority of shrimp exporters to the EU, including Ecuador (15%), India (10%), Argentina (9%), Thailand (9%) and Bangladesh (7%).²⁹

For some, like Bangladesh, the EU is their single most important market – most notably the UK, Belgium and the Netherlands.³⁰

In 2012, EIJ conducted an in-depth investigation into alleged labour and human rights violations in the Bangladeshi shrimp industry. This report traces the entirety of the shrimp supply chain, from fry collectors through to shrimp farmers and processing factory workers. It documents a detailed, step-by-step account of the economic, labour and social issues that plague the industry. Through recorded interviews with fry collectors, shrimp farmers, depot owners and processing plant workers, EIJ has identified sub-standard or exploitative working conditions at all stages of the supply chain, as well as examples of forced labour as defined by the International Labour Organization (ILO), including indefinite and inter-generational debt bondage.³¹

The findings of this report indicate major institutional failings to protect workers and uphold human rights in Bangladesh's shrimp industry. Despite the profitability of the industry, most of the workers engaged in the shrimp supply chain are poor and are being pushed further into poverty as a result of exploitative and often abusive practices.³² This report makes the case for urgent action to be taken by the Bangladeshi Government, the shrimp industry and the countries whose demand for shrimp is fuelling this market, in particular the EU and US.

Top 5 Shrimp Exporters to the EU





75 % of Bangladesh's
population lives
on less than
US\$ 2 a day

BANGLADESH

★ Dhaka

● Khulna

● Satkhira

● Bagerhat

● Chittagong

Cox's
● Bazar

Bay of Bengal

■ Key shrimp producing areas
in Bangladesh

BANGLADESH'S SHRIMP INDUSTRY

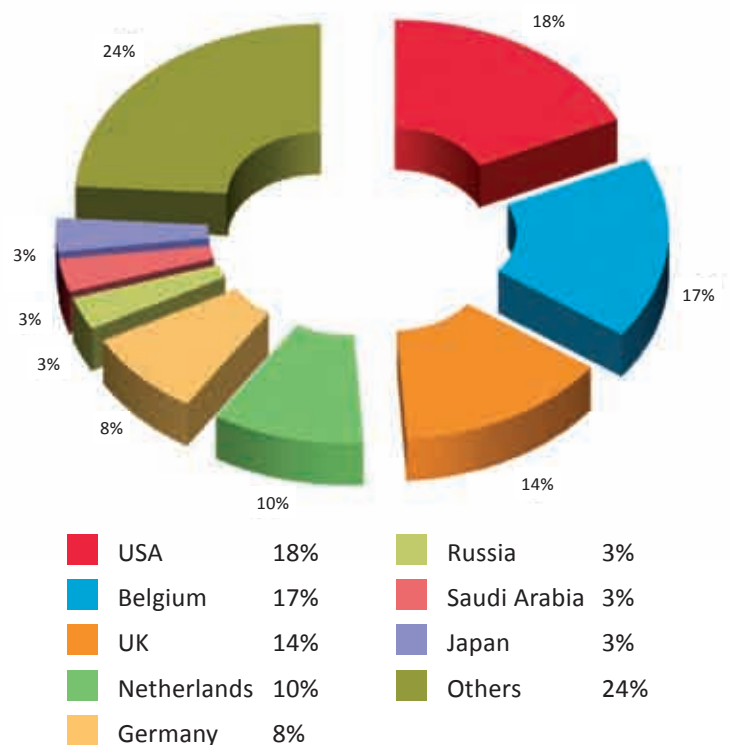
Subsistence shrimp farming, alternated with rice cultivation, had been fundamental to Bangladesh's fisheries sector for hundreds of years; however, the last three to four decades have seen a significant increase in the growth of the industry, with substantial investment and a re-orientation of production towards exports.³³ The transformation of Bangladesh's shrimp industry can be traced back to the period of policy changes incorporated into the Structural Adjustment Programmes (SAPs) implemented in the mid-1980s. SAPs include the economic policy changes imposed by the International Monetary Fund (IMF) or World Bank as conditions for the provision of loans or obtaining lower interest rates on existing loans.^{34/35} The policy changes are designed to encourage the structural adjustment of an economy by, for example, removing "excess" government controls and promoting market competition as part of the World Bank's agenda to increase the development impact of international trade.³⁶

With Bangladesh's combination of plentiful supplies of wild shrimp fry to stock the ponds, low-lying rice fields, a suitable climate, fertile soil and a substantial pool of available labourers, the Government and international policy makers saw the shrimp sector as having a 'comparative advantage' over other industries.³⁷ One of the first areas to see large-scale conversion of land to shrimp farming were the tidal flats of Khulna, Bagerhat and Satkhira districts in the Southwest and the emergence of major shrimp-based aquaculture in the Southeast region of Cox's Bazaar and the Chittagong districts.³⁸

Shrimp farming in Bangladesh takes a variety of forms, largely based on the conditions in a given region. Where freshwater shrimp will thrive, farmers can choose between combined cultivation of shrimp and rice in the same paddy field during monsoon, with an additional rice crop in the dry season (known as 'integrated farming') or alternating between shrimp farming in the monsoon and rice in the dry season.³⁹ Where soil and water salinity is higher due to the presence of brackish waters, combined freshwater shrimp and rice cultivation may not be possible.⁴⁰ Instead, farmers cultivate saltwater shrimp varieties such as bagda (black tiger shrimp), which are highly valued internationally and account for approximately 70 per cent of shrimp aquaculture in Bangladesh.⁴¹

Shrimp is Bangladesh's second largest foreign currency earner after the ready-made garment industry, and a major source of employment in the country.⁴² The total number of workers and dependents involved in the shrimp industry is difficult to quantify. Many work on small, family-owned farms. A high percentage of undocumented workers, unregistered farms and unregulated processing plants means many work beyond the reach of official records.⁴⁵ However, it is estimated that the industry directly provides a livelihood to nearly 1.2 million people, while approximately 4.8 million are indirectly dependent on this sector.⁴⁴

Shrimp Exports from Bangladesh 2010



Source: Bangladesh Frozen Foods Exporters Association (BFEEA)

The structure of shrimp farm ownership has also undergone significant changes. Beginning in the 1980s, wealthy and well-connected urban dwellers combined forces with political leaders and local administrators to illegally access agricultural land, which was often taken over by force and converted into large-scale saltwater ponds suitable for shrimp cultivation.⁴⁵ However, since 1995, outbreaks of White Spot Syndrome, a viral disease, began causing mass mortalities of shrimp in Bangladesh, resulting in a dramatic decline in yields.⁴⁶ Between 1998 and 2002, productivity declined by an average of 31 per cent, while prices suffered a setback of 17 per cent.⁴⁷ As cultivation became less profitable in the early 2000s the majority of large-scale shrimp farmers moved into the processing phase of the industry and began building lucrative businesses exporting frozen shrimp.⁴⁸

This movement has led to a shift from shrimp being almost exclusively exported in frozen block form to the proliferation of value-added products such as individually quick-frozen, peeled and de-veined, butterfly cut, breaded, marinated, cooked and semi-cooked shrimp preferred by Western consumers.⁴⁹ In 2001, these value-added exports made up approximately 25 per cent of total exports.⁵⁰ The primary consequence of this shift was the addition of a processing stage to the shrimp supply chain and a return to small-scale, independent shrimp farms.

FROM FRY TO FORK – A SUPPLY CHAIN OPEN TO ABUSE

Western demand for cheap shrimp has shaped the modern Bangladeshi shrimp industry. Companies have sought to increase their flexibility in production whilst reducing labour costs, in order to maximise their international competitiveness and assert their place in the extremely lucrative international market. The effects of this have been most greatly felt in the lower segments of the chain where poverty, social vulnerability and lack of industry regulation have allowed labour conditions to fall severely behind the pace of industry expansion and sophistication.

Bangladesh's shrimp supply chain is largely unregistered, with around 90 per cent of its total workforce confined to the poorest sections of the coastal communities, making it extremely susceptible to labour and human rights abuses.⁵¹

More than 75 per cent of Bangladesh's population (approximately 131.5 million people) lives on less than US\$2 a day, with over 40 per cent living on less than US\$1.25.⁵² While the shrimp industry contributes approximately four per cent of the country's GDP, at a local level it has done little to reduce poverty and hunger, or foster development.⁵³

It is this large and impoverished workforce that provides the labour for the most dangerous and physically demanding stages of the shrimp supply chain. The three key stages where these workers are concentrated are fry collecting, farming and processing. These are also the stages where abuses appear to be most prevalent.

In 2006, the Bangladesh Labour Act (BLA) was adopted with the intention of promoting and protecting workers' rights; however, this legislation excludes many sectors, including domestic, agricultural labourers and school workers. As a result, the law does not cover the 1.2 million people working in the informal sectors of the shrimp industry, such as fry collectors and small-scale shrimp farmers.⁵⁴ Moreover, implementation and enforcement remain serious challenges, particularly with regard to the aforementioned informal sectors.⁵⁵

The failure to implement and enforce existing labour laws combined with severe restrictions on workers' ability to form unions and engage in collective bargaining has contributed significantly to incidences of labour and human rights abuses. A review of union activities in the processing stage between 2010 and 2011 found that, even when unions were formed successfully, the majority of executive committee members were dismissed without reason or forced to resign.⁵⁶



Abuses reported in Bangladesh's shrimp industry:

Hazardous working conditions, Child labour, Bonded labour, Withholding of pay, Excessively low wages, Restrictions on unionisation, Verbal abuse, Health and safety violations, Extremely long hours

A significant factor related to the continued prevalence of abuses in the shrimp industry is the complexity of the supply chain, which makes it difficult to monitor, report and address many of the alleged abuses occurring at the various stages. Each of the key stages of production – fry collecting, farming and processing – present their own unique challenges. Fry collecting is a predominantly unregistered activity, and workers are not required to provide or receive any documentation for their transactions, which are usually carried out through one or two intermediaries before reaching shrimp farms. The shrimp farms themselves are also largely unregulated, with a 2010 survey by the Coastal Development Partnership (CDP) finding that more than 90 per cent of shrimp farms were unregistered.⁵⁷ In 2013, the Bangladeshi Government appears to have gone some way towards addressing this issue by registering a large number of shrimp farms and promising to develop a National Shrimp Policy.⁵⁸ It remains to be seen what affect this will have on labour issues, with the focus of these measures largely aimed at addressing quality control for export to European and US markets.⁵⁹

WHAT IS FORCED LABOUR?

According to the International Labour Organization (ILO), the following indicators can be used to identify forced labour:

- Restrictions on freedom of movement
- Withholding of wages or identity documents
- Physical or sexual violence
- Threats and intimidation
- Fraudulent debt from which workers cannot escape
- Abusive working and living conditions

Source: ILO (2012), Indicators of Forced Labour



Many of the country's poorest people are involved in collecting and sorting shrimp fry © Philip Gain/SEHD

For fry collectors and shrimp farmers, a lack of financial capital and access to markets further compounds their situation, with many being forced to take loans to cover costs and supplement income in the low season. Poverty and debt expose workers to exploitation and abuse. In the processing plants, approximately 70 per cent of workers are day labourers or contract workers.⁶⁰ They have no set working hours, fixed wages, contracts, appointment letters or employment records. Processing agents may use sub-contractors to hire workers, making monitoring of employment practices even more problematic.⁶¹

Profits from the shrimp industry are primarily limited to a minority at the top of the supply chain, while the real price of 'cheap' shrimp is being paid by some of the Bangladesh's poorest and most vulnerable people. A cycle of debt resulting from low wages, debt bondage and financial insecurity perpetuates the use of bonded and child labour and will remain a problem if urgent action is not taken.

Despite its overall lack of transparency, there is a clear division between the 'winners' and 'losers' in Bangladesh's shrimp industry. Those at the top of the chain are hatchery owners, large-scale shrimp farmers and processing plant owners. Fry collectors, small-scale farmers and processing plant workers rank among the lowest for poverty levels and economic conditions.⁶² The following sections of this report will outline the issues encountered at each of these stages in the supply chain and provide compelling examples of the problems faced by vulnerable individuals working throughout the shrimp industry.

FRY COLLECTING – DIRTY AND DANGEROUS WORK



A female fry collector pulls a net through the water © Philip Gain/SEHD

The shrimp fry (larvae) needed to supply the ponds are sourced from wild stocks or from hatcheries. In Southwest Bangladesh, wild-caught shrimp are preferred because of the lack of local hatcheries and the perception that wild fry is more resilient and of better quality.⁶³ More than 400,000 people, mainly women and children, collect shrimp fry and represent the most vulnerable section in the supply chain.⁶⁴ Typically poor and landless, their work is seasonal and their livelihoods are highly dependent on the availability of fry.⁶⁵

The high season for wild shrimp fry collection is from March until August. During that period, collectors spend between six and 10 hours a day catching fry in local rivers and estuaries.⁶⁶ For the rest of the year, most collectors sustain themselves and their families by borrowing money and working as day labourers, honey collectors and in other temporary occupations.⁶⁷

In 2006 the Bangladeshi Government reinstated a ban on wild fry collection as a result of environmental concerns and a desire to promote hatchery production.⁶⁸ This had a devastating effect on some of the country's poorest people who, already laden with debts incurred in order to purchase nets and other equipment, now faced a reduction or even complete loss of their income.⁶⁹ However, the ban has done little to curb wild fry collection, instead making fry catchers more vulnerable as a result of the necessity to pay bribes to local law enforcement officials in order to continue their work.⁷⁰ Research conducted by US-based labour rights group Verité found that the ban had made fry collectors more vulnerable to exploitation and harassment, with 16 per cent of those interviewed claiming to have been the victim of extortion by local authorities and paramilitaries, while 11 per cent reported experiencing credible threats of violence.⁷¹

CHILD LABOUR

Bangladesh has ratified a number of international conventions relating to the use of child labour, including the ILO Worst Forms of Child Labour Convention (C182) and the UN Convention on the Rights of the Child.

In addition to these conventions, Bangladesh's Ministry of Labour and Employment adopted a National Child Labour Elimination Policy in 2010, which provides a framework to eradicate all forms of child labour by 2015.⁷² Despite this, child labour remains commonplace in the Bangladeshi shrimp industry, particularly at the fry collecting stage.

Poverty is a major contributor to the use of child labour in the shrimp industry, with children frequently becoming involved in fry collection to help supplement their family's low income.⁷³ By the age of 10, many young people have begun work as fry collectors, pushing nets through the river, working on the boats or sifting through the catch.⁷⁴ Evidence gathered by EJF demonstrates the continued use of child labour in shrimp fry collection in Bangladesh.

WHAT IS CHILD LABOUR?

- Work for more than five hours per day.
- Work that creates undue pressure on his/her physical and psychological health and social status.
- Work in an insecure and unhealthy environment.
- Work without wage or with irregular payment or for low wages.
- Work or duties disproportionate to the child's capacity.
- Work that hinders the child's education.
- Forced labour.
- Work which demeans human dignity.
- Work where the child is the victim of physical and/or mental torture and sexual exploitation.
- Work where there is no opportunity for leisure or recreation.

Source: Bangladesh Ministry of Labour Employment,
National Child Labour Elimination Policy



Features of child labour:

Pressure on physical and psychological health, Insecure and unhealthy environment, Work without wage, Forced labour, Physical or mental torture and sexual exploitation

**By the age
of 10,
many young people
have begun
work as fry
collectors**



A young fry collector gathers shrimp larvae – child labour is still commonplace among fry collectors in Bangladesh © Philip Gain/SEHD



CASE STUDY

Asma Ulhusna, 10

"My parents cannot afford to pay for my school stuff, for example pens or notebooks, so I get money from this to buy all that. When all the people go and do six hours, I go too, maybe two days or three days a week. When we go to collect shrimp fry, I don't go to school, but the rest of the days I go. I want to do something else. I want to become successful after finishing my studies."

(Transcript of interview with EJF)

Asma Ulhusna, a ten-year-old fry collector working in Chokbara, Gabura Union, works six hour days and as many as 18 hours a week. This means she only goes to school for two or three days a week. The dangerous and unhealthy environment and low wages associated with shrimp fry collection constitute 'hazardous and demeaning' work under the National Child Labour Elimination Policy of Bangladesh and are therefore illegal. This corroborates findings by others that indicate a failure to protect the right to education and uphold Article 17 of the Constitution, which ensures that "the state shall adopt effective measures for the purpose of establishing a uniform, mass-oriented and universal system of education and extending free and compulsory education to all children to such stage as may be determined by law." In Bangladesh, this age is stated as 12 years old.

Source: The Constitution of the People's Republic of Bangladesh, Article 17

BONDED LABOUR

Bonded labour is prevalent throughout the Bangladeshi shrimp industry, often in the form of the debt bondage of fry collectors and shrimp farmers to intermediaries.⁷⁵ Poor and marginalised fry collectors and farmers can be tied to intermediaries through conditional loans, or *dadan*, which are borrowed as start up capital; for example, to buy nets for fry collection, establish a shrimp farm or even as supplementary income in the low season.⁷⁶ As well as accruing interest, *dadan* obliges farmers and collectors to sell their produce at a fixed price to intermediaries.

Wild fry of bagda shrimp is available for nine months a year, with the peak period from March to August.⁷⁷ Most shrimp fry collectors already live in poverty and, as household incomes decline during the low period, many are forced to take out loans to survive. Fry collectors may never escape the cycle of debt and can spend most of their lives as bonded labourers. Each fry season begins with an attempt to repay their debt, but even if that is successful, it is most likely that the collector will need to renew their debt during the low season. If they fail to pay the middlemen they may be subjected to intimidation and violence and have their nets, the lifeline of their income, taken away.⁷⁸

“

For three, four or even five months a year there is no season, no fry in the river. In those times, they have to basically borrow money from middlemen to sustain their living. The terms for that are that you won't be able to sell, except to this person, and there is interest as well.

They don't pay money – they pay by giving them all the fish they catch. What we see here is that a shrimp fry collector becomes indebted to the middlemen. It works as a vicious cycle, because they will always be indebted one way or another. And then his next generation will have to take that burden.”

”

Biblop Sarker, field officer with Shushilan, a Bangladeshi NGO working to uphold human rights and gender equity

WHAT IS BONDED LABOUR?

- A widespread form of forced labour in many developing countries.
- Often originates with a poor and illiterate individual pledging labour services to work off a debt.
- Obligation may pass from one family member to another.
- Labour service is rarely defined.
- Workers often become dependent on the creditor and labour in slave-like conditions.
- Violence or other penalties for failing to work constitutes forced labour.

Source: ILO, 'Elimination of all forms of forced or compulsory labour'



A depot owner sorts shrimp fry for sale to farmers © EJF

DANGEROUS WORKING CONDITIONS

In addition to long hours and other labour violations already discussed, shrimp fry collectors in Bangladesh also face further threats to their safety as a result of the environment they work in. Bangladesh's Sundarbans represent the largest continuous area of salt-tolerant mangrove forest in the world. A complex network of tidal waterways, mudflats and small islands of mangroves make the area a perfect habitat for a variety of fauna, including the estuarine crocodile, bull shark and the Bengal tiger.⁷⁹

The Sundarbans is also one of the poorest and most densely populated regions of South Asia, with an estimated eight million people directly dependent on its fragile ecosystem.⁸⁰ This combination of high dependency on the Sundarbans' natural resources and habitat destruction as a result of a large, rapidly expanding population has brought humans into ever-increasing contact with the dangerous wild animals living there. According to the National Center for Biotechnology Information (NCBI) "tiger attacks are rising in the Sundarban and causing fatality [sic] on both sides" as a result of habitat destruction, depletion of food sources and increasing numbers of people venturing further into the forest to gather food, fire wood and other resources.⁸¹ The NCBI also claims that corruption and mismanagement of protected areas – including allowing the poaching of spotted deer, wild boar and other key tiger prey – has forced tigers into more regular contact with humans in search of food.⁸²

A study of two villages by the NCBI found that wild animals had killed 111 people, with fry collectors representing nearly 25 per cent of all recorded animal attack victims; in cases involving women, fry collectors represented half of all animal attacks.⁸³ However, according to Bikash Sasmal, Convener of Bangladeshi Aila-affected People's Committee, "crocodile, shark

attacks and snakebites are never reported as it does not carry compensation," making it hard to measure the scale of the risk facing shrimp fry collectors.⁸⁴ Working in waist-deep river water, fry collectors are also particularly susceptible to crocodile and shark attacks.⁸⁵

Snakes also pose a danger for Bangladeshi shrimp fry collectors. An estimated 710,159 episodes of snakebites occur annually in rural Bangladesh with around 6,041 fatalities.⁸⁶ The highest incidences of bites have been observed in Southwestern coastal Barisal division, followed by Khulna division. More than half of victims are bitten while working either in agricultural fields or in water. Only three per cent of victims are able to get medical attention and there are high fatality rates for those who are not treated with anti-venom.⁸⁷

Drowning is another serious and common danger for fry collectors, a leading cause of death among children, as the same tidal currents that provide the brackish water for shrimp farms also exacerbate the threat.⁸⁸ The risk is much higher for women and children because of their clothing, swimming abilities, and levels of strength and endurance.⁸⁹ Shrimp fry collectors are also at higher risk because fishing is at its peak around full moons, when larvae concentration in surface waters is at its highest and river levels and flow increase.⁹⁰

The water itself also presents its own perils, as prolonged immersion in brackish river water puts shrimp fry collectors at risk of severe health and sanitary problems. This is compounded by the fact that many have no access to medical facilities. Negative health impacts resulting from prolonged exposure to brackish water, include waterborne diseases, skin infections, urinary tract infections, diarrhoea, cholera and dysentery.^{91/92}



*There are a lot of dangerous animals,
I mean species, in the water, like crocodiles.
And there are also nights when you have to
work through the entire night.
Basically, it's difficult to work in the dark
because you really have to focus on the task,
and it's difficult and it puts a lot
of pressure on my eyes.*

Morzina Khatum, shrimp fry collector



CASE STUDY

RIHANNA AKHTAR, 32

"We have to pay. If we don't, he'll take away our net, boats, and then he won't let us into the river. It has happened many times. If I find it difficult to pay back, our net was taken away, he's threatened us that we cannot do this anymore, it really happened, it happened quite often"

(Transcript of interview with EJF)

Rihanna Akhtar, 32-year-old shrimp fry collector from Dumuria, Gabura Union, started collecting fry 25 years ago around the time the shrimp industry in Bangladesh began rapidly expanding. Expecting that the job would help lift her from poverty and pay off her debts, she found instead that her debt spiralled and she constantly owed more than she was able to earn. In order to buy nets as well as covering the costs of schooling and medical care for her children, she was forced to take out more and more loans, and now owes around 12,000 taka (\$154), or three times her monthly wage.

As a result, she is forced to sell her catch for a fixed price to her debtors, creating a spiral of debt that is almost impossible to escape. If she is unwilling or unable to re-pay her debts she faces having her net taken away and being denied access to the river. In extreme cases, this has led to threats of physical violence and even threats on the lives of indebted fry collectors.

SYNOPSIS

Throughout the investigation EJF identified a number of extremely concerning issues associated with the fry collection stage of the shrimp supply chain in Bangladesh. With around 90 per cent of the workforce drawn from the poorest sections of coastal communities, workers are extremely vulnerable to labour and human rights abuses. The informal nature of many of the activities involved in fry collection, as well as a lack of regulation, further expose workers to abuse and ill treatment.

Poverty and disempowerment frequently force fry collectors to borrow money through unofficial channels, which is then paid back by selling their catch at prices below market value. As a result, workers require further loans to meet expenses, such as school and medical treatment. This begins a cycle of debt that is almost impossible to escape and, as EJF discovered, leads to threats against the workers.

Poverty is also a key factor in the use of child labour, of which EJF found substantial evidence. In order to help their families, children as young as 10 are involved in shrimp fry collection, regularly missing school and putting themselves in significant danger of drowning.

In addition to the vulnerability of workers to exploitation and abuse, the nature of the work itself poses considerable risks to the safety of the fry collectors.

Drowning is a serious danger, particularly during the full moon, which brings both high concentrations of larvae as well as higher tides and stronger currents. The Sundarbans are home to some of the world's most dangerous animals, including tigers, crocodiles, sharks and snakes. Collecting fry in deep water and in close proximity to these animals' habitats leaves workers particularly vulnerable to attack.

Bangladesh's shrimp industry is highly profitable and continues to grow, yet the abuses EJF observed at the fry collecting stage of production are largely the result of a lack of registration and regulation of the industry. While Bangladesh's labour law includes provisions to address many of these issues, the informal nature of the industry and a lack of enforcement results in the continuation of unacceptable working conditions. Unless urgent action is taken to address the structural and regulatory shortcomings involved in shrimp fry collection, these abuses are likely to continue.



A farmer casts a net to harvest shrimp from his ponds © EJF

SHRIMP FARMING – A CYCLE OF DEBT

Shrimp farming is the second major stage in Bangladesh's shrimp industry supply chain. Fry collectors sell their produce to middlemen or, occasionally, directly to markets, where it is bought by farmers. Once the shrimp has been raised in the ponds over the course of three to six months, the farmers sell the shrimp to depot owners. As well as being plagued by many of the same labour and human rights abuses that characterise fry collecting and other stages of the supply chain, shrimp farming also presents its own unique issues and is arguably the most environmentally damaging stage of the production process.

Over the past few decades Bangladesh has seen a significant shift in farm ownership. Today, approximately 80 per cent of farms are operated by the people who own them, with the remaining 20 per cent operated by tenant farmers leasing land from local owners of private land.⁹³ Small shrimp farms outnumber large farms by three to one and of the approximately 250,000 shrimp farms, 50 per cent are smaller than half a hectare.^{94/95} On average, 10 people depend directly on each shrimp farm.⁹⁶

Demographically, the typical small-scale shrimp farm owner is a middle aged, married Bengali man who did not enter secondary school education. He takes care of six family members with a daily income of Taka 350, which is equivalent to US\$0.83 per family member per day. Shrimp is usually not the family's only occupation, with the majority involved in other income-generating activities, including farming and fishing. However, shrimp farming provides approximately 85 per cent of the family's income.⁹⁷

Few shrimp farmers have direct market access to processing factories or foreign trade, with most separated by layers of intermediaries. In a survey of farmers in the Southwest, approximately half were found to sell to depots while a third of farmers sold to local middlemen. Only one in 14 farmers sold directly to shrimp processing factories.⁹⁸ Like fry collectors, the majority of farmers lack access to credit, transport and infrastructure and remain under the control of the middlemen and buyers higher up the supply chain.⁹⁹

The financial pressures put on farmers and shrimp fry collectors by this system can be extreme. Testimonies documented by EJP reveal that many are locked into cycles of debt and dependence, making them increasingly vulnerable to poverty and hunger. With no opportunities for livelihood diversification or financial support, the future is often bleak. It has been reported that these challenges are sometimes seen as insurmountable, leading some to take their own lives.¹⁰⁰

“

The majority of the farmers who get into this debt cycle can never get out. And we have an example in Rampal where a farmer committed suicide because of that, because of not being able to pay back and having to borrow more money again.

”

Kamrul Hassan Bablu, CDP Volunteer Researcher and former shrimp farmer, Khulna



PRICE FIXING



A shrimp farmer displays his catch © EJF

The common practice of price fixing means that farmers are regularly paid well under the true value of their produce, leading them to take loans and get into debt to cover costs and other expenses. Farmers have reported that the price of shrimp has dropped in recent years following an increase in supply and the syndication of many shrimp processing plants.¹⁰¹

Prices on today's market are largely dictated by the Bangladesh Frozen Foods Exporters Association (BFFEA), which holds a monopoly over the national market, uniting 96 of the country's 145 processing factories.¹⁰² In Khulna, all factories certified for export to EU markets are members of the BFFEA.

Occupying the lower end of the supply chain, farmers feel a disproportionate impact of this monopolisation. A lack of competition between processing factories coupled with an inability to access other markets means that farmers, sub-suppliers and depot owners have very little choice about where they sell their shrimp. It is no surprise that some farmers see themselves as the 'losers' in Bangladesh's shrimp industry.¹⁰³



**1 shrimp farmer
typically supports
6 family members
with a daily
income of just
US\$ 0.83
per family member
per day**



CASE STUDY

MOLAI BASHWASH, 38

"The companies can take loans from the Government, from banks and from others. Sometimes when they default, they are not held accountable. But then look at us; we are the loser in every way. Last year we sold our shrimp for much higher rate, and now we have to sell it for half the price. How will we survive?"

(Transcript of interview with EJF)

Molai Bashwash is a small-scale shrimp farmer who has been farming shrimp for five years. After a few years of success, the unfair financial pressures placed on farmers, rises in the cost of fry, price fixing by the bigger companies and withholding of payments mean he is now losing his business. As a result of price fixing by large companies, the amount he is paid for his shrimp has been halved over the course of one year. At the same time, the price of shrimp fry is on the rise and the depot owners who sell his shrimp for him owe him half of his profit from last year. The depot owners, in turn, are waiting to be paid by the large processing and export companies who often claim that shipments are rejected or cancelled and refuse to pay those further down the chain, despite receiving significant Government subsidies. As a consequence of this combination of factors, Molai has been forced to take further loans from CARITAS and BRAC, on top of the 12,000 taka (\$154) he already owes to others. With his revenues decreasing, costs rising and an increasing level of debt, Molai is uncertain about how he and his family will cope.

WITHHOLDING PAYMENT

The withholding of payment is common in Bangladesh's shrimp supply chain. The reasons can be various and even unintentional, but it is those at the bottom of the supply chain who feel the effects most acutely. When a depot owner is owed payment by the processing factory, he is unable to pay the farmer whose shrimp he has sold, who is in turn unable to pay the fry collector who provided the fry. With debts to pay and families to support, their already desperate situation can force them to take further loans and fall deeper into debt.

As a general practice, each processing factory places an order with intermediaries for a large delivery of shrimp, who in turn collect from numerous unregistered small-scale farmers. The factory usually provides around 20 per cent of the total price upfront and promises the rest once the shipment has been completed.¹⁰⁴ Loans are repaid when shrimp are successfully exported and processing plants are able to pay depot owners and sub-suppliers through their agents. In turn, depot owners and sub-suppliers will then pay the shrimp farmers. Repayment can be slow and fragmented, paid through instalments, allowing farmers as well as depot owners to cancel only part of their debts.

“

Yes, the depot owners have paid me back, but there is still some money that they haven't paid me back – 2-3,000 Taka [US\$24-37]. They don't actually pay back the full amount; they've paid me back in instalments. I mean, with the market price of the shrimp and the price that went up of the shrimp fry, my guess is I will also have to borrow a lot of money from the bank in the future.

”

Alamin, shrimp farmer in Vacotmari Upazila, Orka Union, Kampal



Shrimp is weighed at a depot before being sold to processing factories © EJF

Bangladesh's shrimp industry is heavily supported by the Government through credit and export subsidies, which disproportionately benefit the large processing plants and exporting companies.¹⁰⁵ These companies receive the payments even if an order is cancelled or rejected; however they rarely pass this on to depot owners or farmers. Therefore, when a shipment is cancelled or rejected or the processing plant delays a shipment to fill a quota, farmers may find themselves waiting for more than a year to be paid.

“

*It's right: sometimes
when a farmer sells the shrimp to us
we cannot instantly pay
the money back. We have to borrow
loans to pay them back because
we only get paid 20-30% from
the companies.
And for the rest of the money
we have to borrow or
we have to tell them,
'wait, we will pay you back.'*

”

Mollik Monirujaman, depot owner in Fila Fish Market, Bagerhat



The Farmer – Shushanto Ray, 42

*“We have to organise
ourselves to protest against
this exploitation.
Only then will the Government
realise that there's a problem.”*

(Transcript of interview with EJP)

Shushanto Ray is a small-scale shrimp farmer, typical of the vast majority of shrimp farmers in Bangladesh. A lack of capital and access to the market mean he is forced to sell his shrimp through a depot at the price that is set by the larger processing companies higher up the supply-chain.

In addition to regularly receiving below market prices for his shrimp he also lives in an almost perpetual state of being owed money for his produce, which he in turn owes to others as loan repayments.

In order to cover costs and repay some of his debts, Shushanto is often forced to take out more loans, leading to a cycle of debt that is increasingly difficult to escape.

SURVIVING ON LOANS

A lack of access to capital through fair and legitimate loans is one of the major factors contributing to shrimp farmers becoming trapped in a cycle of debt and poverty. As with fry collectors, poor and marginalised farmers can be tied to intermediaries through conditional loans, which are often borrowed as start-up capital for shrimp farms and as supplementary income in the low season. As well as accruing interest, these loans oblige farmers and fry collectors to sell their produce at a fixed price to intermediaries. Bangladesh's shrimp industry is heavily subsidised by the Government; however, the vast majority of this money goes to processing plants, depots or other middlemen, leaving small-scale farmers to cover all of the costs of production.

In rural Bangladesh, middlemen have traditionally held a position of power as traders and moneylenders and it is common to borrow from family members and neighbours. Lending is informal with interest rates and payback schemes depending almost entirely on personal negotiations.¹⁰⁶

Middlemen can loan cash to farmers without any interest, though on the condition that farmers sell their shrimp to them at a rate below the market price. Sub-suppliers and middlemen may not in fact be solvent themselves and need to take loans from depot owners or processing plant agents, agreeing to sell their shrimp to repay the loans.¹⁰⁷

While the formalisation of the microcredit system has seen the relative dominance of middlemen begin to decline, there are still a number of serious issues that plague the system. There are now four main types of institutions recognised to carry out microfinance activities: the Grameen Bank, NGO Microfinance Institutions (MFI), commercial and specialised banks and Government sponsored microfinance programmes.¹⁰⁸

According to S. Masum, Executive Director at the Coastal Development Partnership (CDP), farmers generally prefer to take loans from NGOs for two key reasons. The first is that few truly small-scale shrimp farmers, who make up the majority of shrimp producers, have the collateral required for larger loans from commercial banks. The second is that, with NGO interest rates around 30 per cent, they offer a much more attractive choice for farmers than local middlemen, who regularly charge between 75-100 per cent interest or require farmers to sell their produce for below market rates.¹⁰⁹

However, though formal micro-lending has been praised for its capacity to alleviate poverty, it often only provides an alternative to, and not a catalyst for, the creation of socially equitable supply chains. Shrimp farmers who are unable to sustain themselves because they do not receive a price for their produce are regularly forced to take microcredit loans. Farmers carry on borrowing, paying relatively high interest, receiving unfair prices and continuing the cycle of debt.



The true cost of cheap shrimp is being paid by the rural poor in producer countries © EJF

It is clear that NGO loans are not providing a comprehensive solution for breaking the cycle of debt these producers are trapped in. The strict weekly payment system means that farmers have to take loans from four to five NGOs at the same time in order to be able to repay on time.¹¹⁰ According to Mr Masum, there have been no detectable changes in the standard of living or livelihoods of shrimp farmers over the past few years.¹¹¹

“
*Sometimes, when I'm desperate,
I have to take loans from local
neighbours. When I borrow money
from NGOs, if I take Taka 20,000
I have to start paying back the
following week. There are 52-week
instalments with a 12.5% interest rate.
If I borrow from the middlemen, I also
have to pay them back, but in one
instalment or maybe two.*

”
Shushanto Ray, shrimp farmer, Vacotmari Upazila,
Orka Union, Rampal

SYNOPSIS

Following EJF's interviews with a variety of stakeholders at the farming stage of the Bangladeshi shrimp supply chain – from small-scale farmers to depot owners and middlemen – it is clear that the lack of regulation of this largely informal industry is pushing shrimp farmers deeper into a cycle of debt.

The monopolisation of the national markets by a syndicate of large-scale operators renders small-scale farmers almost entirely powerless. Without regulation, these operators are able to fix the market prices for shrimp as they see fit, with little relation to the cost of production or the true market value of the produce. This leaves farmers with an unstable and variable income that regularly fails to meet their costs and forces them to take loans to survive.

Despite a processing and export industry that is heavily subsidised by the government, these much larger companies regularly withhold payment from those further down the supply chain, citing delayed, cancelled or rejected orders. Though these companies receive subsidy payment regardless of cancellation or rejection, they rarely pass these benefits on to farmers and depot owners. The withholding of payment to workers living in poverty further exacerbates their already precarious financial situation. The instability this creates forces farmers and depot owners to take out loans to cover living expenses, pushing them further into debt.

While improvements have been made within Bangladesh's microfinance system – predominantly favoured by vulnerable workers at the lower end of the supply chain – they have fallen short of addressing the fundamental and systemic issues that make the need for loans so commonplace.

Urgent action is required to implement fair and equitable regulation of the industry and ensure that farmers are paid a fair price for their produce and the money they are owed to prevent the need for further loans. It is also vital that Government subsidies are distributed equally to ensure the entire industry can benefit.

Pushing the poorest further into poverty and debt leaves them extremely vulnerable to exploitation, as well as hunger, sickness and abuse. For the true potential of the shrimp industry to be realised across Bangladeshi society, these issues must be addressed.

LABOUR VIOLATIONS IN SHRIMP PROCESSING

An estimated 30,000 workers are employed in the 145 shore-based processing plants in Bangladesh – more than two thirds of whom are women.^{112/113} EJF's investigation revealed clear violations of the 2006 Bangladesh Labour Act (BLA) in the country's shrimp-processing industry, including substandard pay, excessive working hours, unpaid overtime, and delayed payments.¹¹⁴ While EJF's findings represent a snapshot of the industry, the evidence gathered during the investigation is consistent with a number of recent reports into Bangladesh's shrimp sector.^{115/116/117}

Compared to the global average, factory labour in Bangladesh is cheap, with the nationally established minimum wage for the shrimp-processing industry at 2,645 taka per month (\$34), one of the lowest in Asia.^{118/119} However, a field survey by the Solidarity Center found that wages can vary considerably across different types of workers, with permanent workers receiving between 1,800–5,500 taka (\$23–\$70.50) per month and contract workers between 1,500–4,000 taka (\$19.20–\$51).¹²⁰ The survey also found that 73 per cent of contract workers received less than the nationally established minimum wage, while approximately half of permanent workers reported regularly receiving their wages late.¹²¹

A large proportion of workers operate on a piece rate 'results-based' payment system, where an employee is paid a fixed rate for each unit of production. By requiring workers to work 'piece rate' and sub-contracting large numbers of temporary and contingent 'contract' workers, processing plants are able to further reduce labour costs. However, EJF received reports from workers that their production was consistently undervalued and that they were routinely underpaid. Piece rate work is associated with a number of social and economic problems and is particularly common amongst contract workers, who make up 70-80 percent of the processing labour force.¹²² Contract workers regularly receive payment significantly below the equivalent rate for permanent workers and can suffer from a lack of economic or social security, as they are unlikely to receive healthcare, childcare, holiday or maternity leave entitlements.¹²³ According to a Solidarity Center report entitled *The Plight of Shrimp-Processing Workers of Southwestern Bangladesh*, "interviews with workers reveal that BLA 2006 is far from fully implemented."¹²⁴

While doing work where my hands are wet for long hours, I get swollen fingers, or sometimes infection and fever.

Rowshan Aran, contract processing worker

RESTRICTED UNION ACTIVITIES

The activity of labour unions is severely curbed in Bangladesh's processing factories. According to the International Trade Union Confederation, independent unions have been formed and collective bargaining demands have been submitted in some of the largest processing factories.¹²⁵

Trade unions were able to conduct their normal activities such as collective bargaining, but Government action made it nearly impossible to form new trade unions in many sectors, for example, in the ready-made garment and shrimp industries.

US Department of State (2012)

However, a review of union activities between 2010 and 2011 observed that, shortly following the formation of unions, the majority of executive committee members were dismissed without cause or were forced to resign.¹²⁶ These factories included Organic Shrimp Export (Pvt) Ltd., Jahanabad Seafoods Ltd., Modern Seafood Industries Ltd., Southfield Fisheries Industries Ltd. and Southern Food Industries.¹²⁷ Similarly, the US Department of State reports that, while unions are legally permitted to act on behalf of workers, Government activity makes the formation of new trade unions extremely difficult, particularly in the garment and shrimp sectors.¹²⁸



Bangladesh's large exporting companies sit at the top of an inequitable supply chain © EJF

ABUSE OF PROCESSING PLANT WORKERS

EJF's investigation recorded testimonies from workers who had personally encountered verbal abuse. The most common form was 'rough' language being used against workers when their supervisors felt they were not working fast enough. However, there is a spectrum of inappropriate treatment and one worker described her treatment by her employers as "unspeakable".¹²⁹ Another, a permanent worker at Jahanabad Seafood Ltd, reported "very rough" treatment when he was tired and that he was sworn at if he fell behind in his work. He felt he had no job security and said "if that [rough treatment and swearing] doesn't work they'll throw me out. They threatened to throw people out. Sack people."¹³⁰

“

My monthly salary is 3,200 Taka, there's no extra bonus whatsoever [...] there's no holiday for me, every month I have to work every day, and I work 12 hours. I start work at 8am and I finish work at 8pm.

”

Shahidul, permanent factory worker at Jahanabad Seafood Ltd

“

I only get a break two or three times, during the day and if I ask for more, for a toilet break, they say no, you cannot go, wait for your lunch break. I only get one lunch break during the day and that is 30 minutes but when there's a lot of work to do, I get maybe 10 or 15 minutes. A 15 minute break is more regular.

”

Amina, permanent factory worker at Jalalabad Seafood Ltd

EXCESSIVE HOURS

According to testimonies from processing plant workers documented by EJF, both contract and permanent workers regularly complete 12-hour days and are not paid overtime.¹³¹ These constitute violations of Bangladeshi law, particularly Articles 100, 101 and 108 of the 2006 Labour Act.¹³² Workers reported that they were not given holidays, with many working seven days a week. Bangladeshi law mandates that workers should have an hour off each day for lunch, yet EJF found no evidence that processing plant workers were given this time. A number of workers also reported they were unable to take toilet breaks when needed.

Evidence gathered by EJF demonstrates routine and systematic flouting of the Labour Act throughout Bangladesh's shrimp supply chain.

LABOUR ACT, 2006

100. Daily hours: No adult worker shall ordinarily be required or allowed to work in an establishment for more than eight hours in any day:

... any such worker may work in an establishment not exceeding ten hours in any day.

102. Weekly hours: (1) No adult worker shall ordinarily be required or allowed to work in an establishment for more than forty-eight hours in any week.

(2) Subject to the provisions of section 108, an adult worker may work for more than forty-eight hours in a week:

Provided that the total hours of work of an adult worker shall not exceed sixty hours in any week and on the average fifty-six hours per week in any year.

Source: Bangladesh Labour Act 2006 (English)

CASE STUDY

Amina, 20

"In the Jalalabad Seafood Company, a union was established in the past year for our welfare. It was really helpful for us, but after a while the owners basically dismantled the union and we don't have a union anymore. I want that union to be reestablished, because it helps us. They fired the union leader, and basically sent thugs to beat him. Then he had to leave his area, he had to leave his home."

(Transcript of interview with EJF)

Amina is a 20-year-old permanent worker at Jalalabad Seafood Ltd shrimp-processing factory, where she has worked for five years and is paid 3,200 taka (\$41) per month. She works 12 hours a day, seven days a week and says that her supervisors become angry if employees request a day off. When her daughter was born, her employers, who required that she show a doctor's certificate, gave her one-week maternity leave. Working long hours with their hands submerged in water, Amina says that many processing workers get swollen fingers, infections and fever; however, if they are absent for two days or more due to illness, they are not paid for the entire week. Conditions began to improve following the establishment of a union at the factory, though the company quickly broke this up, with the organisers fired, beaten and threatened. Amina told EJF of her desire to see the union reestablished and standards improved.





CASE STUDY

TASLIMA, 20

"The way they treat me is really unspeakable. They don't treat us as human beings, and the language they use - it's really derogatory. It's not dignified at all. For example, when we go to ask for our wages they say, 'Go to the street and beg instead, why are you here?' That really upsets me a lot."

"I don't wear any gloves. My hands get swollen while working, and sometimes my fingers bleed. If they had a first aid box, it would have been ok for us, it would have helped, but they don't have any and we have to buy our own medicine. [...] When I come out from work my fingers are still swollen, I cannot touch anything, it's painful."

(Transcript of interview with EJF)

Taslina is a 20-year-old contract worker at Saint Martin Seafood Ltd shrimp-processing factory, where she has worked for eight years and is paid approximately 100 taka (\$1.20) per day. However, she says she is often forced to wait 15-20 days to be paid. Aside from low and late pay, Taslima also spoke of enduring 'unspeakable' treatment and being verbally abused while at work, as well as health and safety standards in violation of Bangladeshi labour law. Workers at Saint Martin Seafood are not provided with gloves or first aid equipment, which can lead to swollen, cut and painful hands.

WITHHOLDING PAYMENT

Testimonies collected by EJP indicate that processing plants are committing labour violations by failing to provide payment to workers when it is due as well as underpaying for work completed. One contract worker reported that as much as a third of her daily work spent de-heading shrimp, the equivalent of 20-30 kilos, is unpaid by her employers.¹³³ Her wages are based on the quantity of shrimp she processes, which is measured by baskets rather than weight, and she argues her employers are underestimating the full capacity of each basket. Contract workers in other plants have reported that wages are due at the end of each working week, but getting their pay can be difficult, and that employers have ‘punished’ workers for absence due to illness by rounding up the number of days off to the nearest week.

“

They don't pay me every day, after a week of work, they are supposed to pay me but then they delay a lot. They don't pay easily.

”

Taslima, contract worker in Saint Martin Seafood Ltd

“

A basket holds 30 kilos of shrimp, but they tell me it's 20 kilos and the extra 10 kilos I have to do for free. They pay me 40 taka (\$0.51) per basket. Everyday I do two to three baskets; they make me work for three baskets and pay me for two.

”

Kanta, Contract worker in Shannewaz Seafood Ltd

POOR HEALTH AND SAFETY

“

[My work] is very tiring, I work 12 hours a day... We only get breaks twice a day to go to the toilet. There's no freedom on that. And the excuse they give is that 'You had a 30 minute break on your lunch, why would you need to go to the toilet again, what is your problem?'

”

Nilufar, permanent worker at Salam Seafood Ltd

Shrimp processing workers perform repetitive tasks, often standing for long periods in damp conditions. Few workers are provided with protective clothing, including gloves, that would prevent many common injuries or illnesses associated with the work because they are thought to slow workers down.

Cuts, fungal infections, arthritis, urinary tract infections, repetitive strain and diarrhoea are widely reported illnesses in the processing industry.^{134/135/136} Occasionally, the skin infections on the hands of processing plant workers are so severe that they are unable to eat their meals with their hands.¹³⁷ The Department of Labour is responsible for checking health and safety standards. However, a researcher was told by the Department of Labour in Khulna that the department does not have any doctors to assist in this process.¹³⁸

For processing plant workers, peeling and de-heading shrimp in 12-hour shifts with their hands constantly submerged in icy water often results in numbness, skin irritation, infections, fever and even partial paralysis. A 25 year old contract worker at Saint Martin Seafood Ltd told how she uses her bare hands to de-head shrimp, often causing her hands to bleed. This problem is compounded by the fact that her employer does not provide a first-aid kit and requires workers to purchase their own medicine, despite the injuries being the result of poor health and safety standards at work. Not only is this an example of hazardous working conditions, but the failure to provide first aid facilities is also a violation of Bangladeshi law.





CONCLUSION

Bangladesh's shrimp industry has emerged from a murky past, one tainted by land grabbing, marginalisation and social and environmental abuses. Despite efforts at a national level, research suggests that abuses remain; at least partially enabled by the industry's complex and opaque supply chain. Today it is a growing and profitable sector that has become a key component of the national economy, providing employment to millions of people.

However, like many of the fisheries and aquaculture sectors across the world, the industry has failed to facilitate an equitable rate of social and economic development for all stakeholders. The poorest and most vulnerable groups within the supply chain have remained in poverty, with their livelihoods and environmental security increasingly under threat.

This report provides evidence that sub-standard and exploitative working conditions exist at all levels of the shrimp supply chain, from fry collection to the processing factories, and has documented examples of forced labour, including debt bondage.

Shrimp produced under exploitative and abusive conditions is entering EU and US markets and being sold to consumers who are largely unaware of the true cost being paid for their shrimp by some of the Bangladesh's most vulnerable people. This is made possible partly by the lack of scrutiny required by EU and US import regulations, which focus almost exclusively on food safety and product quality, to the detriment of labour and human rights standards.

The shrimp industry that links Bangladesh with countries including the US and EU Member States is almost exclusively export-driven and controlled by a few large exporting companies. For this reason, the necessary improvement and change will largely be top-down, consumer-led and Government supported. In particular, there is urgent need for greater transparency and accountability. Retailers, buyers and distributors should demand that their suppliers prove the shrimp they export is produced under fair working conditions. Consumers should challenge retailers and restaurants to ensure their shrimp is socially responsible and environmentally sustainable.

The Government of Bangladesh must work closely with national industry representatives and farmers' associations to formalise employment throughout the supply chain. A compromise must be found that enables the industry to remain profitable while allowing it to address the many serious social and environmental abuses throughout the supply chain and deliver far better employment terms for workers and producers.

RECOMMENDATIONS

The Bangladeshi shrimp industry must:

- Work with Government to improve labour conditions and ensure the fair payment of wages for all employees in the shrimp industry.
- Allow and encourage unrestricted access for independent and unannounced third-party audits and monitoring of all aspects of shrimp production to enhance transparency.
- Support initiatives to register and approve all producers who adhere to credible third-party certification schemes on labour standards.
- Improve oversight of all stages of the supply chain, with particular regard for billing and payment of suppliers. Ensure that full and fair payment to suppliers is made within a reasonably agreed time frame and that payment is not affected by rejected or cancelled shipments at the exporting phase.
- Commit to ensuring that all fry collectors, farmers, farm workers and factory workers are aware of their labour rights and all new employees are made aware of their rights on commencement of employment.
- Ensure that, in both policy and practice, all workers have the right to join or form trade unions of their own choosing and to bargain collectively without fear of intimidation and violence. Employers must not in any way prohibit or hinder the formation of trade unions.
- Support arbitration processes to address complaints and resolve disputes for workers.

The Government of Bangladesh should:

- Work actively towards the full implementation of the already ratified thirty-three Conventions of the International Labour Organization (ILO) and the 2006 Bangladesh Labour Act within the relevant areas of the shrimp industry.
- Publicise, review and implement the National Shrimp Policy-2013 outlined by the Department of Fisheries in the summer of 2013. Ensure this Policy adequately addresses the serious labour issues involved in Bangladesh's shrimp industry, as well as health and safety considerations for export.
- Ensure that employers adhere to the 2006 Bangladesh Labour Act and conform to relevant International Labour Organization (ILO) standards.
- Develop a more effective and comprehensive system for the registration of communities and individuals involved in shrimp fry collection.
- Strive to eliminate child labour in the shrimp supply chain with special regard to hazardous work, such as fry collection, full time work on shrimp farms and work in processing factories.
- Work closely with national industry representatives and farmers' associations to formalise employment throughout the supply chain.

The international community should:

- Develop trade-related instruments to promote practical improvements in the way shrimp is produced and processed in Bangladesh.
- Ensure import regulations consider both the health and safety conditions of an imported product as well as the social and environmental circumstances in which it has been produced.
- Work with the Government of Bangladesh to facilitate effective implementation and enforcement of the 2006 Bangladesh Labour Act throughout the country.
- The European Union should employ the Generalised System of Preferences (GSP) arrangements to reinforce incentives for the respect of core human and labour rights, environmental and good governance standards.

Shrimp importers and retailers should:

- Require traceability of Bangladeshi shrimp and transparency through third-party monitoring throughout the supply chain.
- Commit to demonstrate that their supply chains are free from labour and human rights violations.
- Provide information to consumers on the origin of all fisheries products and the actions taken to guarantee that they are not connected to human rights or labour abuses.
- Support the development of independent, third party certification and labelling regarding environmental and labour standards.
- Support the development and implementation of fair trade standards for shrimp production to promote greater equity and help alleviate poverty.
- Support independent monitoring and reporting by civil society.

The donor and development community should:

- Support research to investigate the viability of 'group certification', where groups of shrimp producers pool resources to apply for a single producer certificate.
- Provide financial assistance directly to improve governance and regulation of the shrimp industry.
- Support the development and implementation of fair trade standards for shrimp production to promote greater equity and help alleviate poverty.
- Support independent monitoring and reporting by civil society.

Consumers should:

- Demand retailers commit to ensuring all shrimp is produced sustainably and without forced, bonded or child labour.
- Call for retailers to provide customers with information on monitoring, traceability and other steps taken to help eradicate human rights abuses from their supply chain.



Sunset over shrimp farms in Bangladesh © EJF

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*“My parents cannot afford to pay for my school stuff,
for example pens or notebooks, so I get money from this
to buy all that. When all the people go and do six hours,
I go too, maybe two days or three days a week.
When we go to collect shrimp fry, I don’t go to school,
but the rest of the days I go.*

*I want to do something else.
I want to become successful after finishing my studies.”*