

# FAKE MY CATCH



The Unreliable Traceability  
in our Tuna Cans

GREENPEACE

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The Greenpeace ship is in the Western Pacific Ocean.  
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Port of Kaohsiung, Taiwan. © Greenpeace

## EXECUTIVE SUMMARY

US seafood company Bumble Bee, one of the leading companies in the canned tuna market with nearly 90% consumer awareness levels,<sup>1</sup> and its Taiwanese parent company Fong Chun Formosa Fishery Company (hereinafter referred to as FCF), one of the top three global tuna traders, play an important role in the global tuna industry, and thus hold responsibility over the health of our ocean, the treatment of those working in the tuna supply chain and consumer choices. Both companies have policies on sustainability and corporate social responsibility that are supposed to extend through their supply chain, but according to the analysis in this report, neither are meeting their responsibilities.

This report finds that the information on Bumble Bee's "Trace My Catch" website, which enables consumers to track the source of their tuna product from catch to can, is insufficient and in some cases

incorrect. In a number of cases Greenpeace East Asia's analysis found that the company was sourcing fish from vessels that had engaged in or were suspected of illegal, unreported and unregulated (IUU) fishing, forced labor, and/or human rights abuses. Therefore, Bumble Bee may not be fulfilling its responsibility and commitment to environmental sustainability and human rights, and without consumers' knowledge seafood tainted with IUU and forced labor may have already entered the US market.

Based on 73<sup>2</sup> valid Bumble Bee tuna product codes, this report finds that Bumble Bee tuna was sourced from 290 different vessels, almost half of which are Taiwanese-flagged (119) or owned (22) distant water fishing vessels according to the information on Trace My Catch. In addition, some information on their Trace My Catch website contradicts official information from the Taiwan Fisheries Agency about where the supply

vessel was authorized to fish. Verifying the vessel's location against a third data source- Automatic Identification System (AIS) data from Global Fishing Watch, revealed that 28 fishing vessels' fishing area information provided by Bumble Bee's traceability tool was incorrect. In addition, 13 fishing vessels that supplied tuna to Bumble Bee were listed on TFA's website for IUU fishing.

Based on interviews with nine fishers on six Taiwanese vessels that supplied Bumble Bee, it was found that all nine fishers had experienced or observed at least one of the International Labor Organization (ILO) indicators of forced labor,<sup>3</sup> and six out of those nine fishers had experienced or observed four or more of the 11 indicators. All of the fishers interviewed said they have experienced excessive overtime and retention of identity documents, and over two-thirds of them had their wages withheld.

Greenpeace East Asia research found that Bumble Bee canned tuna collected from Harris Teeter (a wholly owned subsidiary of Kroger Co.) in Arlington, Virginia on April 12, 2022 was sourced from DA WANG, a Taiwanese-owned vessel confirmed to use forced labor by US Customs and Border Protection.<sup>4</sup> In April 2022, Taiwanese authorities indicted the

vessel captain, first mate, and seven others for their involvement for forced labor and human trafficking. Bumble Bee's Trace My Catch website lists the source of this tuna as DA WANG on a trip in 2019, during which a fisher was reportedly beaten and died at sea. This leads to strong inference that seafood tainted with forced labor has already been sold in the US market.

On another Taiwanese fishing vessel, DE CHAN NO.116 evidence was revealed from Greenpeace East Asia interviews with fishers as well as Global Fishing Watch AIS data of suspected IUU fishing, including alleged shark finning and illegal transshipment at sea. The alleged illegal activities took place during a period when the ship was supplying tuna to Bumble Bee according to Trace My Catch.

Greenpeace East Asia urges immediate action from Bumble Bee and FCF, including issuing an apology to the exploited fishers, retailers and consumers, removing products suspected of IUU and forced labor-tainted tuna from the market, disclosure of their supplying vessels list, and establishment of an independent investigation committee for the flaw of Trace My Catch, to address issues of sustainability, legality and forced labor in their supply chain.

# INTRODUCTION

The ocean is vital to life-97% of all the water on Earth, and 99% of the habitable space on this planet, is in the ocean.<sup>5</sup> Not only does it provide food and economic benefits to humans, it also functions ecologically for carbon sequestration and oxygen production. However, our ocean is facing a myriad of threats: from climate change, ocean warming and acidification to plastic pollution and overfishing, the destruction and plunder of our ocean and its marine life continues. More than three billion people around the world depend on the ocean for their livelihoods, but since the 1990s, global fish catches have steadily declined,<sup>6</sup> and more than one-third of fish stocks are now overfished.<sup>7</sup> When a stock is considered overfished, it is exploited beyond an explicit limit set to ensure safe reproduction,<sup>8</sup> which puts fish populations and ecosystems at risk.

Research has revealed that decreasing fish stocks are the driving force behind forced labor in the industry. A report from the United States National Oceanic and Atmospheric Administration (NOAA) identified “dependency on distant water fisheries” as one of the factors that increases the vulnerability of the fishing sector to human trafficking, including forced labor.<sup>9</sup> Due to the depletion of fish stocks, vessels venture further out to sea to access profitable fishing grounds, and these distant water fishing vessels inherently isolate workers and provide very limited means to escape or report abuses. In addition, reports and studies revealing forced labor in the fishing industry have been prevalent in recent years.<sup>10,11,12,13</sup>

The depletion of fish populations inevitably impacts the livelihoods of fishers, including migrant fishers working on distant water fishing vessels; and ultimately impacts consumer markets around the world.

The journey of a tuna can is usually long - from fishing at sea to processing on land and then finally to the market for sale - but that should not stop a diligent company from transparency. Without transparent and traceable information, it is hard for consumers to know whether the canned tuna on the shelf of their local supermarket is sustainable or not, whether the fishing vessel that caught it was involved in illegal fishing, or if the workers on board that ship were treated well and fairly, and if a can of tuna can't be clearly traced back through the factory where it was

processed to the ship where it was caught, it is all but impossible for consumers to help prevent the depletion of our ocean and support safe and fair working conditions in the seafood industry.

Fortunately, such problems are gradually gaining attention internationally. To achieve supply chain transparency, a company must know what is happening throughout its supply chain, and must communicate this information both internally and externally. Harvard Business Review reports that one of the main reasons that businesses are paying attention to the concept of supply chain transparency is due to demand from their consumers.<sup>14</sup> A study by the MIT Sloan School of Management also supports this statement, pointing out that consumers are willing to spend 2% to 10% more on products from companies with better supply chain transparency.<sup>15</sup>

Traceability throughout the supply chain is one of the premises of transparency. To achieve traceability, companies must understand the complete path of their products from raw materials to the final product. Seafood traceability is supported by consumers. A 2022 poll shows that almost three-quarters of Americans support traceability, or the ability to track seafood through the supply chain.<sup>16</sup> At present, the world's major fishery import markets, the European Union (EU), the United States (US), and Japan have established legal regulations for the traceability of fish catches, aiming to improve the management and traceability of global catches and combat illegal, unreported and unregulated (IUU) fishing through market forces. The EU took the lead by implementing the Catch Certification System (CCS) in 2010, requiring all imported fish to have a catch certificate improving traceability.<sup>17</sup> The US launched the Seafood Import Monitoring Program (SIMP) in 2016 and revised it in 2018 to manage the import of 13 species groups.<sup>18</sup> Japan passed the *Act on Ensuring the Proper Domestic Distribution and Importation of Specified Aquatic Animals and Plants* (特定水産動植物等の国内流通の適正化等に関する法律), which requires a catch certificate for fish that are at risk of IUU.<sup>19</sup>

In addition, governments around the world have begun to implement legal solutions to address forced labor in supply chains. For example, a *Modern Slavery Act* was passed in the United Kingdom (in 2015)<sup>20</sup> and Australia (in 2018)<sup>21</sup>, requiring qualified companies to

disclose their efforts to eliminate slavery and human trafficking from their supply chains. In the US, the *Tariff Act*<sup>22</sup> prohibits the importation of products produced by forced labor or child labor.

Greenpeace East Asia believes that the problems of overfishing, IUU fishing and forced labor at sea are inextricably linked, and to overcome them we must tackle all three. Given the choice, most people would choose to avoid seafood that came from overfished stocks, was caught illegally, or was caught by enslaved or abused fishers - but without adequate information, they are powerless to make this choice. However, if the seafood supply chain is made more transparent and information is comprehensive, correct and readily available, then seafood brands, retailers and consumers can play an active role and work together to make fisheries sustainable, legal, and fair.

This report examines the supply chain of Taiwanese seafood trader FCF and Bumble Bee, a US canned tuna brand acquired by FCF in 2020. As one of the top three global tuna traders in the world, and with Taiwan being one of the world's biggest fishing entities, FCF and Bumble Bee have significant global impact in the seafood industry. Greenpeace East Asia's investigations revealed suspected IUU fishing and forced labor cases in the company's tuna supply chain. With opaque information and insufficient monitoring of its supply chain, seafood products lacking traceability- and potentially tainted with illegal activities - can enter the US market.

## Methodology

The findings of this report are based on two research methods: supply chain research and interviews with migrant fishing crew.

To investigate Bumble Bee's supply chain, Greenpeace East Asia obtained information from the Trace My Catch system<sup>23</sup> through the code provided on Bumble Bee canned products, in order to further verify whether there were IUU or forced labor cases on fishing vessels that are either Taiwanese flagged or Taiwanese owned but operating under foreign flags. It is noted that all the codes are collected from retailers (e.g. stores and supermarkets) in the US.

Greenpeace East Asia also interviewed migrant fishers who had worked on relevant Taiwanese-flagged or -owned fishing vessels from 2019 to 2021,<sup>24</sup> and cross-checked their statements and related documents, including their contracts, against the International Labor Organization (ILO) forced labor indicators<sup>25</sup> (According to ILO, an United Nation agency that sets labor standards and promotes workers' rights, the indicators represent the most common signs or “clues” that point to the possible existence of a forced labor case. See the definitions and examples in Appendix IX) and related Taiwanese fishery and labor regulations to identify possible violations. All personally identifiable information of the fishers has been redacted for protection, and the fishers' statements from the interviews, their codes, and the corresponding working fishing vessels' names are in Appendix I.

In addition, Greenpeace East Asia used automatic identification system (AIS) data<sup>26</sup> from the fishing vessels to verify the working hours the fishers claimed, and cross-checked this data against the operation of the vessel to find out if labor laws may have been violated, as well as to investigate possible illegal or unauthorized transshipments (transfer of fish from one fishing vessel to another) that fishers claimed had occurred.

# FCF - TAIWAN'S SEAFOOD PRESENCE IN THE US MARKET

2020 Annual turnover:

## USD 2.6 billion

- Annual turnover of USD 1,700 million in 2019. From 2019 to 2020, FCF is the only company with a turnover growth rate over 10% in the top 10 biggest seafood companies globally.
- Taiwan's distant water fishery production value in 2020 is about 863 million USD.

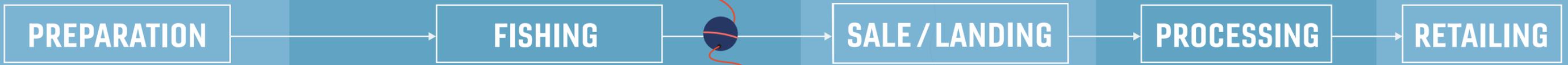
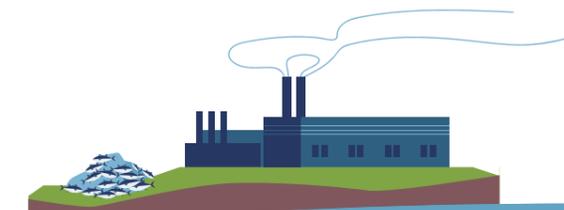
One of the **TOP 3** Tuna traders In the world

**OVER 30** Subsidiaries Globally

Including in Bangkok, Thailand/ Suva, Fiji/ Mahe, Seychelles and other important tuna trading locations

**9th BIGGEST** seafood company in the world

Sourced from **850-900** Taiwanese fishing vessels



- Purchase/ Construct vessel
- Register vessel
- Obtain license
- Obtain quota
- Recruit fishers

**FCF**  
**Services provider, including logistics, crew recruitment, or financing, to fishing vessel operators.**

- Financing
- Fishing license
- Recruit fishers<sup>28</sup>

- Fishing
- Transshipment

**FCF**  
**Provider for transshipment at-sea service and supplies<sup>29</sup>**

- Provision ship
- Transshipment

- Sale and landing
- Customs clearance

**FCF**  
**Trader/Shipping agent**

- Trading
- Cold storage
- Customs clearance

- Primary processing
- Buying and selling
- Secondary processing

**FCF/Bumble Bee**  
**Processor/ Brand**

- Branded Processing
- Products provision

- Import
- Distribution and sale

**Bumble Bee**  
**Importer**

- Customs clearance
- Import tuna product

(Sources: FCF website, ImportGenius, and Undercurrent.)

## FCF's influence from fishing vessels to plates

Bumble Bee was the largest canned tuna brand in the US<sup>30</sup> before its acquisition by FCF in 2020. Though mainly sold in the US, it is also available in Canada. Other brand names include Clover Leaf, Snow's Beach Cliff, Brunswick, and Anova. The headquarters of FCF are located in Kaohsiung City, Taiwan, and FCF is one of the top three tuna traders in the world.<sup>31</sup> FCF doesn't own any fishing vessels; instead, it purchases fish from fishing vessels. In addition to fish trading, FCF's services for its clients (i.e. fishing companies) also include: providing finances for vessel purchase or construction; obtaining licenses, quota and crew; supplying fuel, bait and provisions; and arranging transshipments. The catch traded by FCF is transported to factories for processing into fish filets or canned tuna as the final product. FCF may play a role in all of these various phases including transportation, trading, and customs clearance.

The US, EU and Japan are the main markets for FCF; despite its base, Taiwan has never been the company's main market. After the acquisition of Bumble Bee in 2020, FCF has integrated most phases in the supply chain and started working more closely with the US market. By 2020, FCF

has been ranked the 9th largest seafood company globally, up from 15th in 2019. The company's annual turnover was reportedly up to USD 2.6 billion in 2020,<sup>32</sup> which is three times higher than the annual production value of Taiwan's distant water fisheries of USD 863 million in 2019.<sup>33</sup>

Over recent years, environmental awareness among seafood consumers has increased. To improve competitiveness, seafood companies have been paying more attention to product traceability. In 2015, Bumble Bee launched an online product traceability tool called Trace My Catch, where consumers can enter the code from a Bumble Bee tuna product to get partial information on the origin and supply chain of the tuna it contains.<sup>34</sup> However, despite offering a degree of transparency, the product information on the website is limited, and it depends on the accuracy of the information provided by FCF and its trading partners. If the company deliberately conceals or fails to investigate issues in its supply chain, consumers may still unknowingly purchase products resulting from illegal and unethical behaviors, with the appearance of traceability.

## Obscure and misleading information from Bumble Bee

In early 2022, Greenpeace East Asia and Greenpeace USA collected information from hundreds of Bumble Bee tuna cans from supermarkets in the US. After deducting cans that shared the same code, 76 different codes from various tuna cans were obtained. These codes were then entered into the Trace My Catch system on Bumble Bee's official website to access and record the supply chain information provided, giving information on 452 individual fishing trips,<sup>35</sup> while three codes were found to be invalid. In total, there were 290 fishing vessels that supplied tuna, including albacore and skipjack, to Bumble Bee.

For each fishing trip, the information provided on Trace My Catch includes the corresponding code on the tuna can, the fish species, fishing area, fishing period, fishing method, fishing vessel details (flag state and vessel name in English), and the primary processing and canning location of the product.

From the 290 fishing vessels, Greenpeace East Asia further analyzed 119 Taiwanese flagged vessels using five approaches.<sup>36</sup>

• First, we compared the fishing area information listed on Trace My Catch against information from the Taiwan Fisheries Agency (TFA) to determine

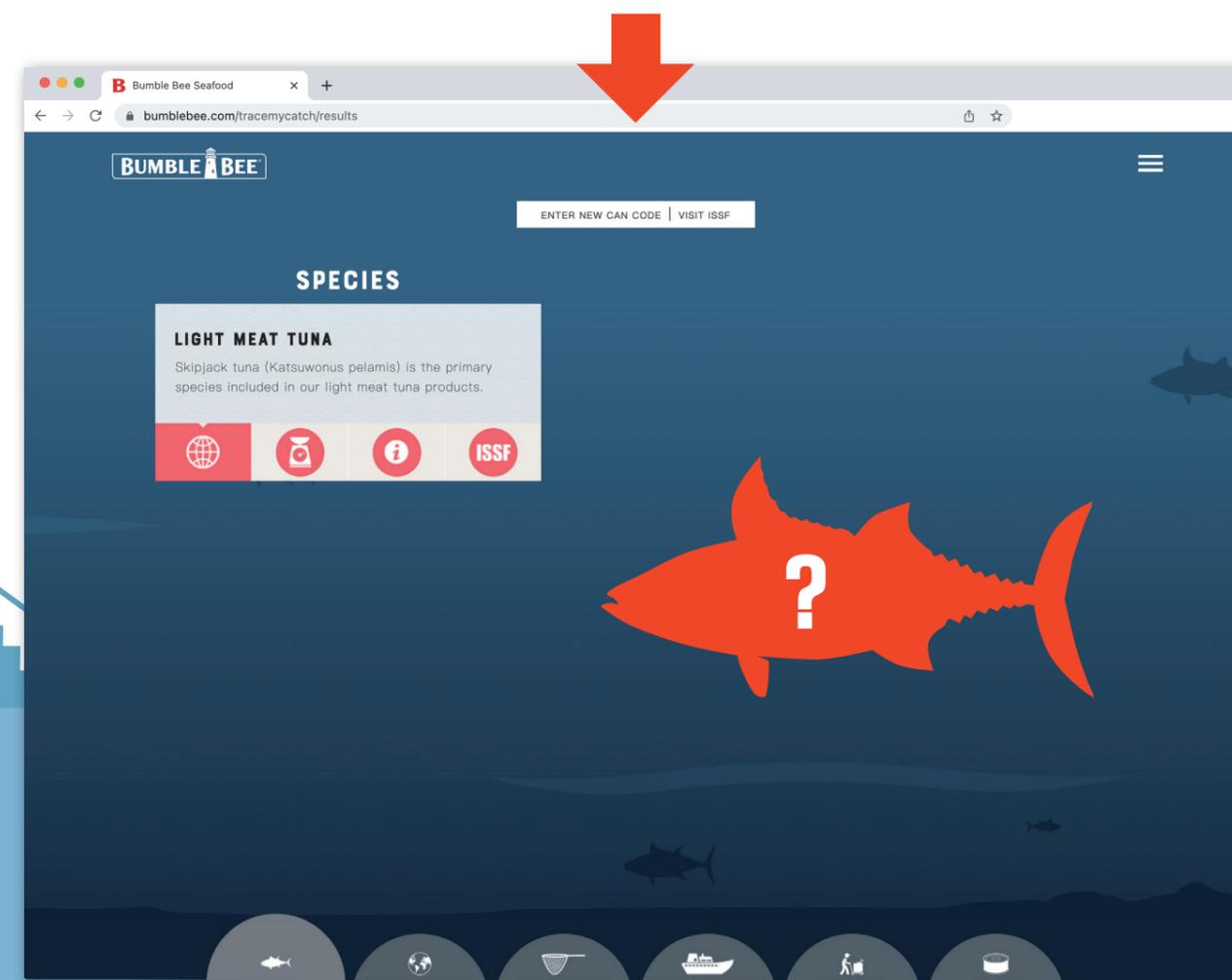
whether the vessel was authorized to fish in that area.

• Second, we checked if the fishing vessel appeared to be involved in unauthorized fishing activities through examining its AIS data and cross-checking its authorized area and period.

• Third, we researched whether the fishing vessel had any history of IUU fishing, including by checking on the publications of Taiwan Fisheries Agency,<sup>37</sup> Trygg Mat Tracking (TMT),<sup>38</sup> and Spyglass.<sup>39</sup>

• Fourth, we cross-checked the time frame of abuses that happened on the fishing vessel DA WANG<sup>40</sup> with the period of time in which the vessel supplied fish to Bumble Bee. The owner and captain of DA WANG were indicted by Taiwanese authorities on charges of involvement in human trafficking.

• Finally, through field investigation and cross-checking the supplying vessels from Trace My Catch, we identified that indicators of forced labor (as defined by the ILO) were reported on six fishing vessels supplying Bumble Bee, in addition to DA WANG.



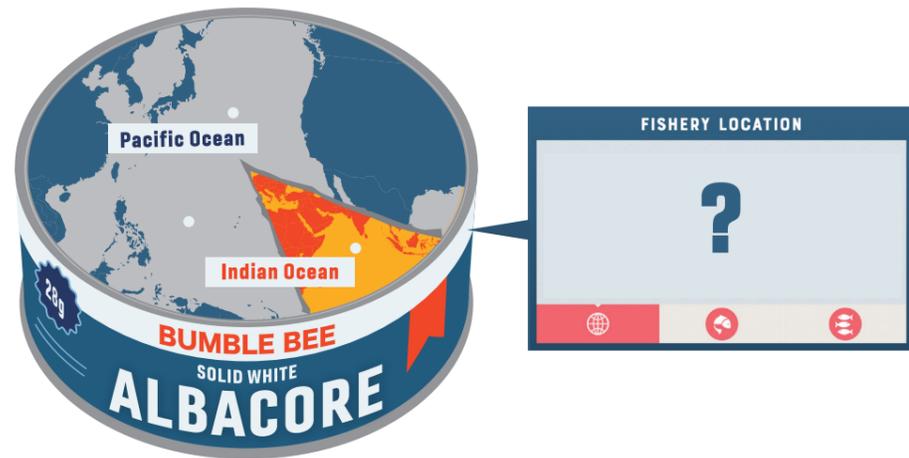
## 1. Inconsistency between information provided by Bumble Bee and that of the Taiwan Fisheries Agency (TFA)

According to the information found on Trace My Catch, the vessels that supplied tuna to Bumble Bee fished in the Pacific and Indian Oceans, targeting skipjack and albacore tuna. The corresponding regional fisheries management organizations (RFMOs) and TFA authorized fishing areas are shown in the table below:

### Corresponding fishing areas from different sources

Fishing areas and target species of vessels that supply Bumble Bee (according to Trace My Catch)	Corresponding RFMO	TFA authorized fishing area
South Pacific Ocean Albacore <sup>41</sup>	Western and Central Pacific Fisheries Commission (WCPFC)	Pacific Ocean
Indian Ocean Albacore	Indian Ocean Tuna Commission (IOTC)	Indian Ocean
Indian Ocean Skipjack	IOTC	Indian Ocean
Western And Central Pacific Ocean Skipjack	WCPFC	Pacific Ocean

The analysis revealed that the fishing area information provided by Bumble Bee for 28 fishing vessels supplying them was different from the fishing areas where they were authorized by the TFA to fish in the corresponding time period. For example, during the period that DER HAE NO.3 fished to supply Bumble Bee (January 1 to February 3, 2020) it was authorized by the TFA for the Indian Ocean fishing area under the Indian Ocean Tuna Commission (IOTC). However, the information regarding its fishing area and species provided on Trace My Catch was "South Pacific Ocean Albacore Stock", indicating that it was fishing in the Pacific Ocean.



For vessels with inconsistent information regarding their fishing areas (such as the example above), AIS data was analyzed to determine their location during the period they fished to supply Bumble Bee. In all such cases, we found their AIS-based trajectories were consistent with the fishing areas authorized by TFA.

The health of tuna stocks may vary significantly between oceans and species, so if Bumble Bee gives incorrect information on the fishing area of a vessel that has caught a particular species, that could mean tuna was sourced from a stock where overfishing is happening. In the example above, AIS data and TFA authorization showed that DER HAE NO.3 was fishing in the Indian Ocean where overfishing of albacore tuna is likely occurring.<sup>43</sup> Meanwhile, Trace My Catch indicated this vessel was catching albacore tuna in the South Pacific, where overfishing of albacore tuna is not occurring. Greenpeace East Asia identified at least eleven cases similar to DER HAE NO.3 in which fishing vessels were fishing in the Indian Ocean according to their AIS-based trajectories while the Trace My Catch website indicated these vessels were fishing in the South Pacific Ocean.

## 2. Fishing vessels on Taiwan's IUU list

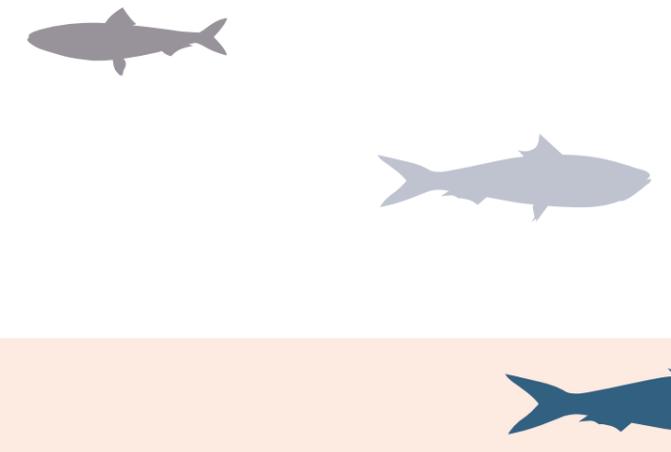
Illegal, Unreported and Unregulated fishing, collectively termed "IUU fishing" are activities that undermine the health of the ocean and management of fish populations, and may also be associated with human rights abuses. Not only does IUU fishing pose a threat to the environment, it is estimated that IUU catches account for one-fifth of the global fish catch, costing the global economy an estimated USD 9 billion to USD 17 billion annually.<sup>44</sup> Therefore, seafood companies, including retailers, brand owners, and traders, have the responsibility to combat such activities by refusing to purchase IUU fish, or from vessels or companies engaged in IUU fishing.

Taiwanese vessels that have engaged in IUU fishing in the past five years are listed by the TFA on its "Combating IUU" web page.<sup>45</sup> After compiling a list of Taiwanese fishing vessels that supplied tuna to Bumble Bee through Trace My Catch, we then compared it with the list of fishing vessels with violations published by TFA in the past five years. This comparison revealed that Bumble Bee had sourced tuna from 13 vessels listed on the TFA's website for IUU fishing (see Appendix II), which means that one in ten (13/119) of the Taiwanese-flagged vessels that we found on Bumble Bee's Trace My Catch website were listed on the TFA list of vessels with recent violations. Their IUU activities included storing sharks' fins without naturally attached to or tied with their bodies, misreporting catch, setting nets near whales, unidentifiable vessel markings and violations of landing notification in-port.<sup>46</sup>

This reveals that tuna sourced from fishing vessels with known IUU records is most likely prevalent in Bumble Bee's supply chain.

Among these IUU records, JIN CHANG NO.17 (current name: JIN WEN NO.99) violated the shark finning related regulation during the fishing trip from May 26, 2019 to March 3, 2020 (see Appendix II). According to Trace My Catch, JIN CHANG NO.17 supplied tuna to Bumble Bee during its trip from September 1 to October 17, 2019, corresponding to the IUU activity period. The IUU fishing not only violated shark finning regulations in Taiwan<sup>47</sup> but also violated Bumble Bee's own shark finning policy that requires sharks be landed with fins naturally attached.<sup>48</sup>

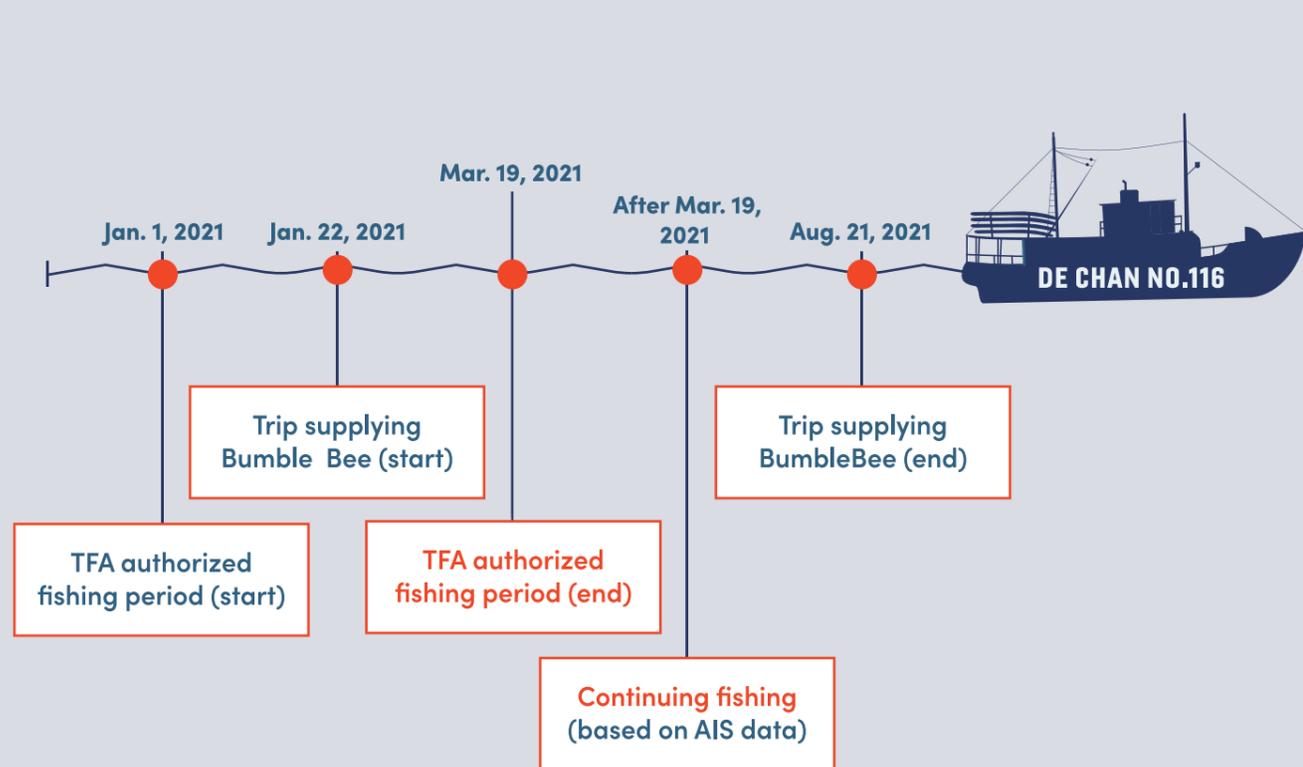
Another Taiwanese fishing vessel DE CHAN NO.116, not listed in TFA IUU list, was suspected violation of shark finning regulations and also supplied tuna to Bumble Bee according to Trace My Catch (the details of which are covered in the next chapter).



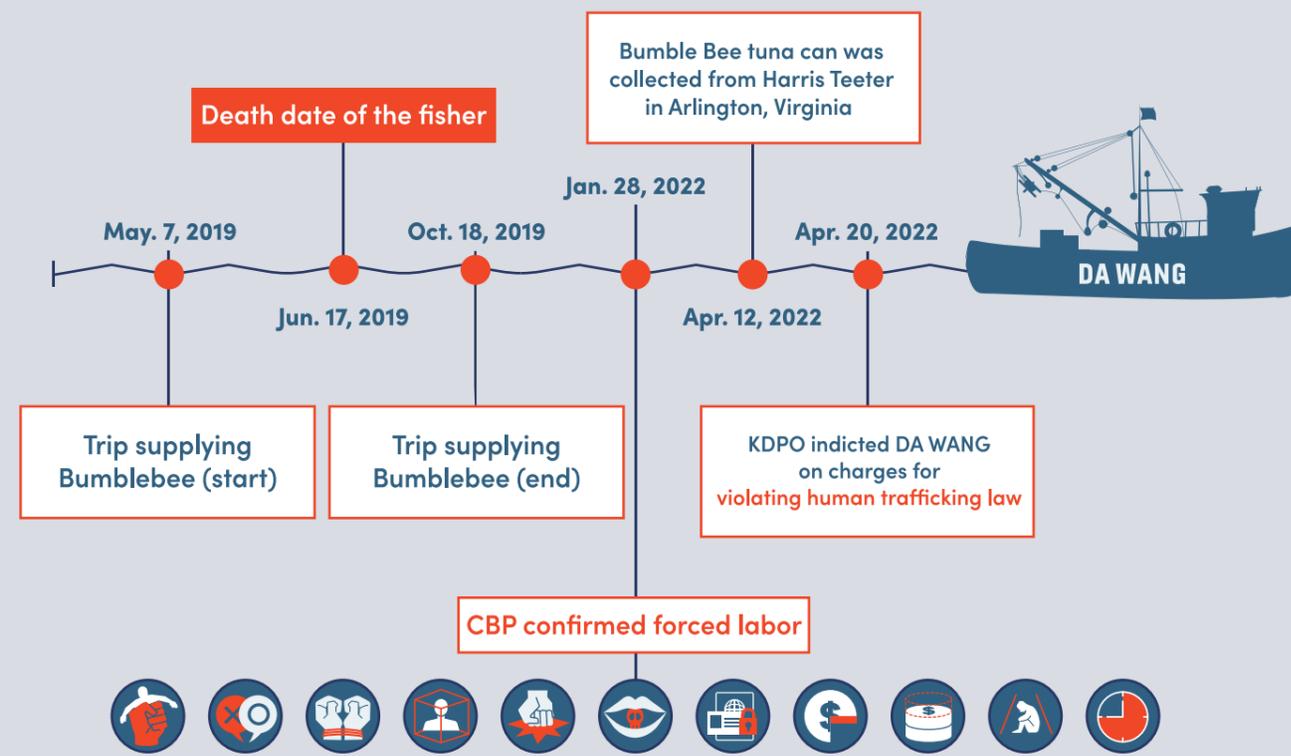
### Taiwanese vessels need to have a "certificate of distant water fisheries permit" to fish

Each Taiwanese tuna fishing vessel can only operate in one ocean area in a given year.<sup>49,50,51</sup> According to the Act for Distant Water Fisheries (hereinafter referred to as the DWF Act), every Taiwanese distant water fishing vessel must have a certificate of distant water fisheries permit (hereinafter referred to as a permit) in order to conduct fishing operations in particular ocean areas. Fishing without a permit is considered IUU fishing by the TFA. Permits are issued once a year, and fishing vessels must obtain a permit to fish in the RFMOs areas. The number of permits authorized by the TFA in the three ocean areas (the Pacific Ocean, Indian Ocean and Atlantic Ocean) is fixed. In other words, a fishing vessel with a permit can only operate in a single authorized fishing area and must not operate in other ocean areas.





The timeline of DE CHAN NO. 116's suspected IUU fishing and its trip supplying to Bumble Bee.



The timeline of DA WANG's reported human trafficking and its trip supplying to Bumble Bee.

### 3. Apparent IUU by a vessel supplying Bumble Bee

IUU fishing - including fishing without the appropriate authorization - is one of the serious violations in the DWF Act in Taiwan.<sup>52</sup> Fishing permits are an important tool to manage fishing effort and prevent stocks from being overfished. Fishing outside the approved period/area, with an expired permit, or in an area without authorization are IUU fishing activities. By verifying the fishing activity of vessels supplying Bumble Bee, this study has found cases of suspected illegal activity, meaning illegally-caught fish may be entering Bumble Bee's supply chain (as shown in the above image).

As described previously, this analysis cross-checked Bumble Bee's reported information on fishing trips against information from the fishing area authorized by the TFA and AIS-based fishing data from Global Fishing Watch (GFW). This revealed evidence of IUU fishing by DE CHAN NO.116,<sup>53</sup> a vessel supplying Bumble Bee. This vessel engaged in a pattern of movement highly indicative of fishing according to AIS well beyond the period it was authorized to fish by the TFA, which ended on March 19, 2021. However information from Bumble Bee's Trace My Catch

website indicated its fishing trip continued until August 21, 2021. Cross-checking against AIS data from the fishing vessel revealed fishing patterns continued when the vessel had no TFA fishing authorization, and also indicated a suspected illegal transshipment at sea during that period, the details of which are covered in the next chapter. Fishing without a valid and current TFA authorization, and transshipment at sea are both serious violations of the DWF Act.

August 18, 2022

Greenpeace East Asia sent a letter to TFA to provide an opportunity to comment. In the letter of reply from TFA, it claimed that on February 26, 2021, the vessel owner of DE CHAN NO.116 requested to extend its certificate of distant water fisheries permit. On March 12, 2021, TFA approved the request and issued the permit to authorize DE CHAN NO.116 to fish from March 20, 2021 to December 31, 2021.

### 4. Bumble Bee selling tuna in the US caught aboard a vessel that has used forced labor

Greenpeace East Asia's investigations also found that Bumble Bee has knowingly sourced tuna from a Taiwanese owned fishing vessel DA WANG, which was involved in forced labor.

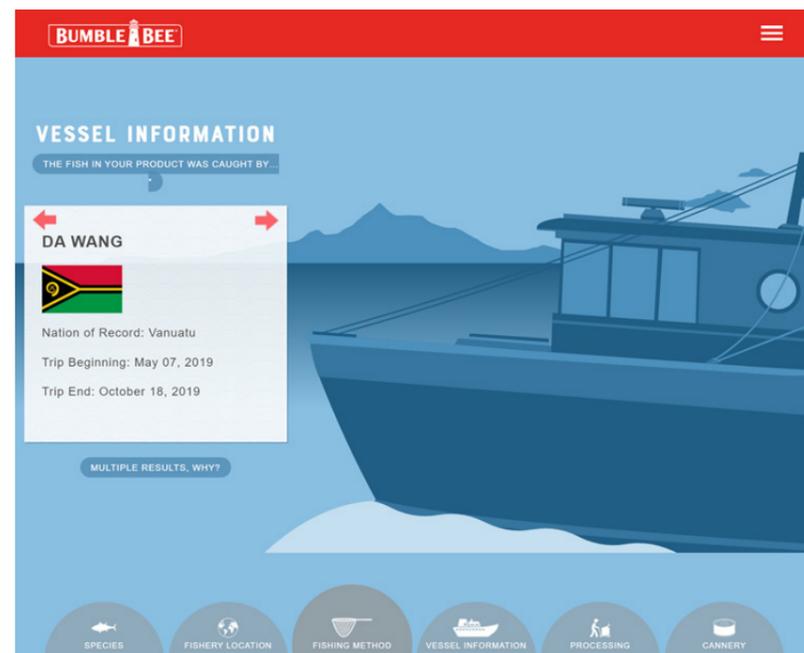
Greenpeace Southeast Asia first revealed suspected forced labor on board DA WANG in its 2019 investigation report "Seabound: The Journey to Modern Slavery on the High Seas,"<sup>54</sup> and provided further detail in its 2021 report "Forced Labor at Sea: The Case of Indonesian Migrant Fishers."<sup>55</sup> In January 2022, US Customs and Border Protection (CBP) confirmed that DA WANG, a vessel owned and operated by the Taiwanese company Yong Feng Fishery Ltd, but flagged to Vanuatu, used forced labor. The CBP found evidence of all 11 of the ILO's forced labor indicators on the vessel, and as a result detained all its catch imported into the US.<sup>56</sup> In April 2022, nine people involved with the vessel, including the vessel owner and the captain of DA WANG, were indicted by the Kaohsiung District Prosecutor's Office (KDPO) in Taiwan on charges including violating the *Human Trafficking Prevention Act* and obstructing freedom.

According to the Prosecutor's Office, DA WANG departed from Taiwan on April 10, 2019. Out at sea, a fisher was reportedly beaten by the first mate during work and died a few days later in June 2019. The fishing vessel returned to shore to bring home the remains of the fisher, but then returned to sea to continue fishing. The following year, another fisher on board was required to continue working after being injured, and later suffered a stroke according to the prosecutor.<sup>57</sup>

Trace My Catch revealed that DA WANG supplied tuna to Bumble Bee during its fishing trip from May 7 to October 18, 2019, during which time a fisher on board was reportedly beaten and later died. US CBP has confirmed DA WANG used forced labor, yet long after Greenpeace East Asia and Greenpeace Southeast Asia had published its evidence and even while the CBP was detaining catch imported from this ship, Bumble Bee already had tuna from DA WANG in its products on US shelves (as shown in the above image).



Greenpeace East Asia research found that a Bumble Bee tuna can purchased from Harris Teeter in Arlington, Virginia on April 12, 2022 was sourced from DA WANG, a Taiwanese-owned fishing vessel that was confirmed to have indicators of forced labor by US Customs and Border Protection. © Tim Aubry / Greenpeace



Bumble Bee's Trace My Catch website shows that the vessel DA WANG provided tuna to Bumble Bee in 2019. During this trip, a crew member was beaten and died at sea according to the prosecutor. Source: Trace My Catch.

## 5. More cases suspected of forced labor within Bumble Bee supply chain

*"It was very cold when we were working, but no raincoat was provided on board."*

The fisher Mr. E working on EAGLE



*"We only had two meals a day, and if we were hungry, we cooked the tail of the tuna to eat."*

The fisher Mr. E working on EAGLE



*"We worked at least 16 hours a day, and sometimes our work started at 1 pm and ended at 5 am the next day."*

The fisher Mr. J working on JUBILEE



**Greenpeace East Asia spoke to additional migrant fishers whose experiences as described met the ILO indicators of forced labor, including but not limited to withholding wages, retention of identity documents and excessive overtime.**

Greenpeace East Asia conducted in-depth interviews with migrant fishers who were or had been working on Taiwanese-flagged or -owned distant water fishing vessels in the past three years (2019 to 2021) to learn about their working and living conditions on board and collect evidence of forced labor practices. We found that six of the fishing vessels from which fishers' interviews revealed conditions and situations that met the ILO descriptions of forced labor indicators have supplied tuna to Bumble Bee according to its Trace My Catch website.

Statements of fishers working on the Taiwanese fishing vessel EAGLE, revealed that the fishers started setting hooks at 4:30 am and worked right through until noon before resting, and then started retrieving hooks and catch at 1:30 pm again. The fishers said

that they typically only got six hours sleep a day, and when there were many fish caught, they could only sleep for around three hours a day. According to the fishers, food on board was also restricted, and they usually only had lunch and dinner each day. If they were hungry, they could only look if there were any tuna tails that they could cook and eat. The living environment was quite harsh.

According to the *Regulations on the Authorization and Management of Overseas Employment of Foreign Crew Members*<sup>58</sup> (hereinafter referred to as the Overseas Employment Regulations), the wages of migrant fishers on Taiwanese distant water fishing vessels must be paid in full. However, migrant fishers' from five vessels that supplied Bumble Bee stated in interviews with Greenpeace East Asia that their wages for work on board these vessels was deducted. They stated that a security deposit of USD 600-800 per trip was deducted from their monthly salaries of only USD 450-500, and was only returned to them if they fulfilled all their duties, including serving the full time of their two-year-long contracts. If these statements are true, this practice likely violates the Overseas Employment Regulations. In addition, the fishers from the six vessels reported that their passports were confiscated and held by the manning agency or the captain on the fishing vessels. According to the fishers, they didn't have access to their own passports at sea, nor when the vessels were in port, depriving them of their basic human rights and freedoms.

Based on the working and living conditions described by the fishers interviewed, Greenpeace East Asia used the ILO forced labor indicators to comprehensively evaluate the six fishing vessels that supplied Bumble Bee and are suspected of being involved in forced labor.

Since distant water fishing vessels usually stay at sea for extended periods and do not return to port frequently, and Bumble Bee has never released a complete list of fishing vessels that supply it, we can only assess from the limited information available how

true they are to their company philosophy of "People, Planet, Product".<sup>60</sup> Based on the fisher's statements from the six vessels, cross-checking data on Trace my Catch and AIS data, and events reportedly leading up to the death of a fisher, it seems clear that Bumble Bee has bought tuna from at least one fishing vessel

using forced labor, and that catch has entered the US through its supply chain. Interviews with fishers from other vessels supplying Bumble Bee indicate this may be only one of many cases of forced labor in the company's supply chain.

### ILO forced labour indicators that were present on board

NO	Vessel Name				 			
	1	2	3	4	1	2	3	4
1	<b>DE CHAN NO.116</b>				●			
	▶	■	✳	👤				
	Jan. 22, 2021	Aug 21, 2021	2020-2022 (2 years)	1				
2	<b>EAGLE<sup>59</sup></b>							
	▶	■	✳	👤				
	Mar. 3, 2020	Jun. 8, 2020	2019-2021 (2 years)	2				
	Dec. 20, 2020	Feb. 14, 2021						
3	<b>JUBILEE</b>							
	▶	■	✳	👤				
	May. 8, 2020	Aug. 7, 2020	2019-2021 (2 years)	1				
4	<b>REN HORNG CHUN NO.168</b>				●			
	▶	■	✳	👤				
	Sep. 16, 2019	Nov. 14, 2019	2019-2021 (2 years)	1				
5	<b>REN HORNG WAY NO.368</b>				●			
	▶	■	✳	👤				
	Jun. 18, 2020	Jul. 21, 2020	2020-2021 (1 year)	3				
6	<b>YI MAN</b>							
	▶	■	✳	👤				
	Dec. 20, 2020	Jun. 21, 2021	2019-2021 (2 years)	1				

      										
5	6	7	8	9	10	11				
		●	●	●	●	●				
		●	●		●	●				
		●	●			●				
		●	●	●		●				
		●				●				

**Note.** vessels are listed in alphabetical order

▶ Trip supplying Bumble Bee (start)

■ Trip supplying Bumble Bee (end)

✳ Working period on board of interviewed fishers

👤 Number of fishers interviewed

## THE GAP BETWEEN POLICY AND PRACTICE: BUMBLE BEE AND FCF

**Bumble Bee's measures are failing to ensure that its tuna products do not involve IUU and forced labor.**

Bumble Bee and its owner company FCF both emphasize the importance of, and their commitment to, environmental sustainability and human rights. However, we found a wide gap between their policies and the reality of their operations.

The sustainability policy of FCF lists the following traceability specifications for tuna products:<sup>61</sup>

- **FCF and its suppliers prohibit sourcing of illegal, unreported and unregulated (IUU) tuna products.**
- **At the primary production level, FCF and its suppliers shall ensure that all tuna products entering its supply chain are fully traceable to the individual fishing vessel trip, with evidence of fishing permit or authorization. FCF is also committed to ensuring this traceability through its product supply chain.**

Regarding human rights issues in the supply chain, Bumble Bee emphasizes on its official website that it is committed to ensuring that all people associated with the company can enjoy safe and fair treatment,<sup>62</sup> and it has also publicly expressed that it prohibits forced labor and human trafficking in its supply chain.<sup>63</sup>

In 2021, Bumble Bee updated its "Supplier Code of Conduct"<sup>64</sup> document, and in the section on forced labor and human trafficking, the company states that it requires its suppliers to agree:

- **Not use any slave labor, prison labor, or permit human trafficking in its supply chain, and will hire workers directly whenever possible.**
- **Its employees will work on a voluntary basis and will not be exploited for forced, bonded, prison, indentured labor, or any sexual purpose.**
- **Its employees will not be prevented from terminating employment.**

- **Its employees will not have their wages manipulated or withheld.**
- **If its employees were hired or recruited through employment agencies or recruiters, they will ensure agents are operating legally, licensed, or certified by competent authority in country of operation, do not extract unreasonable or unlawful fees from employees as a condition of hiring, do not engage in fraudulent recruitment practices that make workers vulnerable to labor exploitation and abuse, and do not deduct or withhold wages from employees.**

In addition, Bumble Bee also requires its suppliers to comply with relevant laws and regulations regarding the working hours, resting hours, compensation and working environment of their employees, including the guarantee of minimum wages and resting hours, allowing employees to refuse to work overtime, and to not be subjected to retaliation or punishment. Last but not least, their suppliers must also agree to be audited by Bumble Bee or a designated third party.<sup>65</sup>

However, according to our analysis and field investigation results, the company's measures are failing to ensure that Bumble Bee tuna products do not involve IUU and forced labor, and provide no guarantee that the fishing vessels that supply it treat their fishers in accordance with the welfare conditions stated in the company's code of conduct. Trace My Catch, which is supposed to serve as a product traceability tool to help consumers buy products with an assurance they come from sustainable and ethical supply chains. However, our investigation reveals that the website provides incomplete information and in some cases inconsistent with other reliable sources that may mislead people to believe that Bumble Bee's products are sourced from fishing operations that respect environmental sustainability, fishery regulations and human rights - when our investigation of the supply chain raises concerns that may be otherwise.

*"We sleep only 3 to 4 hours a day."*

The fisher Mr. D working on DE CHAN NO.116

## FORCED LABOR AND IUU IN TAIWAN'S DISTANT WATER FISHERY

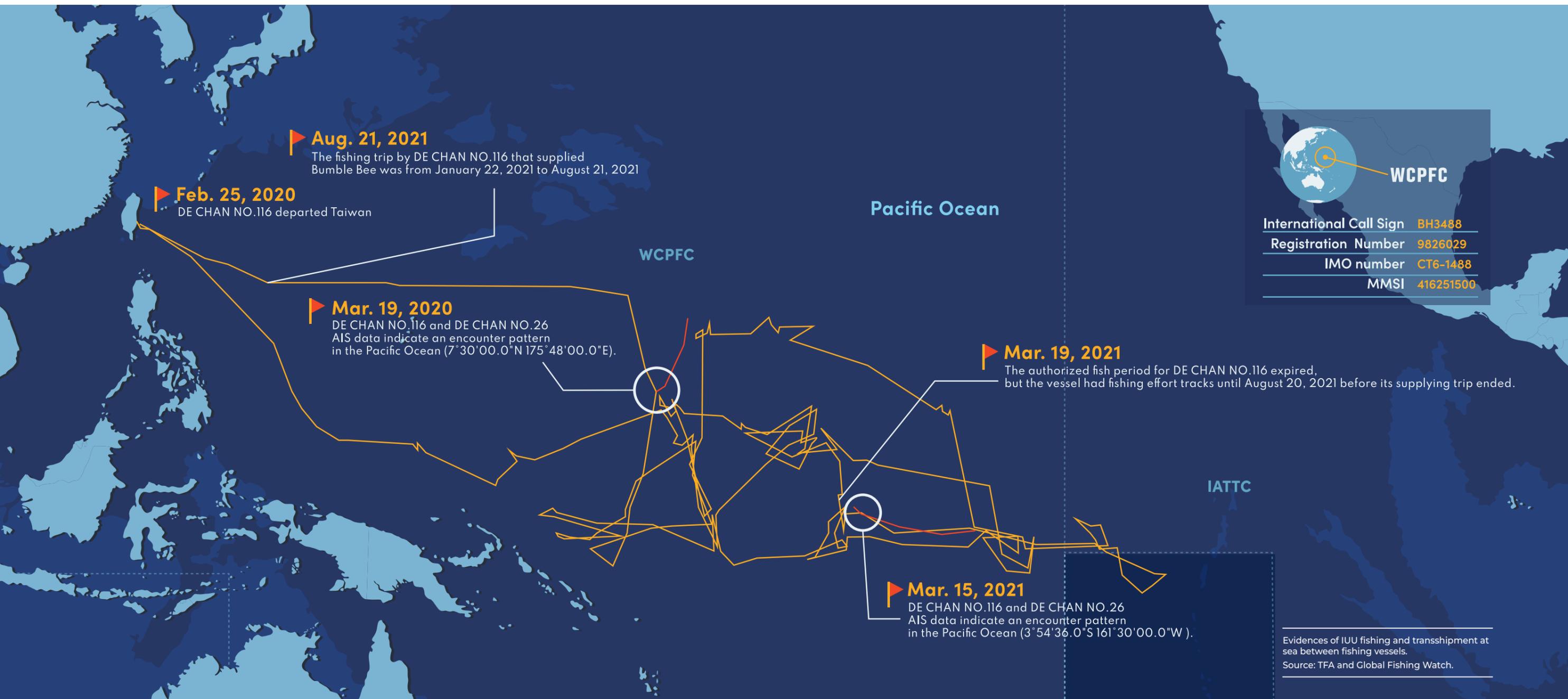
Through our investigation, we found that both Bumble Bee and FCF sourced catch from fishing vessels indicted or suspected of IUU, forced labor and human trafficking, including forcing migrant fishers to work long hours and retaining their passports and wages. From the 290 fishing vessels identified through Trace My Catch as suppliers to Bumble Bee, Taiwanese-related fishing vessels accounted for 141, indicating that Bumble Bee may be receiving close to half of its tuna supplies from Taiwanese-flagged and -owned vessels.

To further understand Taiwan's distant water fishing industry, Greenpeace East Asia interviewed 27 migrant fishers who had worked on 24 Taiwanese-related fishing vessels, including six that were identified via Trace My Catch as supplying Bumble Bee. The interviews found that suspected cases of forced labor and IUU fishing still exist on board Taiwanese distant water fishing vessels.

This chapter presents three case studies to illustrate in more detail the experiences of migrant fishers working on Taiwanese distant water fishing vessels, and the operations and conditions described on these 24 fishing vessels and the suspected instances of forced labor were then compared against the ILO forced labor indicators.

### Case Studies

The following case studies focus on three fishing vessels, DE CHAN NO.116, SHIN JYI WANG NO.6 and JIN WEN NO.99, to better illustrate the harsh working and living conditions on these fishing vessels and their suspected illegal fishing practices. The first of the three vessels is known to supply tuna to Bumble Bee according to Trace My Catch sampling.



## Case 1. DE CHAN NO.116

### Suspected violation of shark finning regulations and company policy

According to the statement of the interviewed fisher, the practice on board DE CHAN NO.116 was for fishers to cut off the heads, gills, tails, and fins of the sharks they caught and store the bodies and fins separately.

This information indicates the vessel violated the shark catch management specifications in Taiwan's *Regulations for Tuna Longline or Purse Seine Fishing Vessels Proceeding to the Pacific Ocean for Fishing Operation*,<sup>66</sup> which requires the bodies and fins of sharks to be kept naturally attached or tied together for storage.

Bumble Bee's own shark finning policy prohibits shark finning and requires sharks be landed with fins naturally attached.<sup>67</sup> However, the Trace My Catch website indicates Bumble Bee purchased tuna caught in 2021 by DE CHAN NO.116, during the time that the interviewed fisher was on board and describes shark finning occurring on the vessel.

It is prohibited to conduct transshipment between any distant water fishing vessels under the *DWF Act*.<sup>68</sup> According to the fisher's statement, DE CHAN NO.116 conducted transshipment at sea with other fishing vessels. Further analysis of the AIS data of the fishing vessel revealed that it showed suspected behavior of transshipment, also known as an encounter pattern.<sup>69</sup> According to its AIS data, during the period from March 2020 to August 2021,

DE CHAN NO.116 had two encounters with DE CHAN NO.26, another Taiwanese vessel that was operating in the Pacific Ocean from November 2019 to August 2021. The first encounter happened not long after DE CHAN NO.116 departed from Taiwan, and took place on the high seas close to the eastern side of Marshall Islands on March 19, 2020, lasting for about 3.5 hours.<sup>70</sup> The second encounter took place a year later, on March 15, 2021, on the high seas near the northern side of the Cook Islands, lasting about 4.5 hours.<sup>71</sup> If these encounters (details are shown in Appendix III) were indeed transshipment activities, then the two fishing vessels would be in violation of the Act and related regulations which prohibit transshipment at sea between fishing vessels.

In addition, we found evidence suggesting that DE CHAN NO.116 was fishing during a period of time it was not authorized to fish. Based on data from TFA, DE CHAN NO.116 was authorized to fish from January 1 to March 19, 2021. However, based on the AIS data of the fishing vessel itself, the vessel showed an apparent fishing pattern in the Pacific Ocean after March 19, 2021 until mid-August when it started its voyage back to Taiwan. The suspected violation was verified through two approaches. First, the supply chain information on Trace My Catch showed that the fishing trip of DE CHAN NO.116 which supplied Bumble Bee was from January 22 to August 21, 2021, exceeding the period of time it was authorized by TFA to fish. Second, based on the AIS data from GFW, DE CHAN NO.116 continued to show fishing patterns

in the high seas of the WCPO after its authorized period ended. These two sources of evidence indicate that the vessel engaged in IUU fishing in violation of the Act, which stipulates that fishing vessels shall not conduct fishing operations without authorization.<sup>72</sup>

#### Seafood entering the US from supply chains suspected of forced labor and IUU fishing

On the basis of evidence suggesting IUU fishing, shark finning and forced labor conditions aboard DE CHAN NO.116, Greenpeace East Asia and Greenpeace USA separately reached out to FCF and Bumble Bee to verify whether they sourced fish from this vessel, yet neither of them respond to our inquiry. However, according to Bumble Bee's Trace My Catch website, the seafood harvested by DE CHAN NO.116 is already being sold in the US. This means seafood consumers in the US are at risk of unknowingly buying tuna caught by a vessel suspected of forced labor, shark finning, and illegal fishing, when they choose Bumble Bee tuna products.

August 18, 2022

In the letter of reply from TFA, TFA stated that according to Fisheries Monitoring Center's record, two encounters between DE CHAN NO.116 and DE CHAN NO.26 were reported to the Fisheries Monitoring Center in advance, and the purpose of the encounters were to exchange or move bait.

#### Transshipment at sea contributes to forced labor and IUU

Transshipment is the transfer of catch from a fishing vessel to a refrigerated cargo vessel or another fishing vessel. Through this practice, a fishing operator can save fuel and time and extend a vessel's time at sea by avoiding port visits for fuel, provisions, fish landings and crew changes. However, illegal fishing vessels may conduct fish laundering through transshipment at sea and allow their catch to enter the market in a seemingly legal manner.<sup>73</sup> According to a study by the Food and Agriculture Organization of the United Nations (FAO),<sup>74</sup> the lack of regulation, monitoring, and control of transshipment at sea increases the risk of IUU fish entering the supply chain, jeopardizing the sustainability and social responsibility of fisheries. Recent studies also identify that transshipment increases the risk of forced labor.<sup>75</sup> As fishing vessels use transshipments to transfer catches and supplies, fishers are isolated at sea for long periods of time, and are unable to escape or report complaints about their working and living conditions.<sup>76</sup>

## Case 2. SHIN JYI WANG NO.6

*"During the year I was on this vessel, I ate uncooked instant noodles for breakfast and lunch, and only got rice to eat at night. The filtered water we drank was sometimes brown, which tasted bad and made us sick."*

*"Many things, including medicines, food, and fruits on the vessel were either expired or moldy, and even the instant noodles provided were expired already."*

The fisher Mr. S working on SHIN JYI WANG NO.6



International Call Sign	BJ4616
Registration Number	8792685
IMO number	CT4-2616
MMSI	416002569



### Reports of harsh working and living conditions on board

According to the statements of two fishers from SHIN JYI WANG NO.6, during their one year at sea on the vessel they had only a single cooked meal each day, which was rice for dinner, while breakfast and lunch consisted only of uncooked instant noodles. The fishers said that the captain kept the galley and the water faucet locked, so they were not able to cook for themselves, and the captain often only distributed food, such as fruit and bread, or medicine to the fishers after it had expired or even gone moldy. Coffee was reportedly limited to one liter per day to all 13 migrant fishers on board. According to the fishers, the vessel's water pipes were old, the drinking water not only had a rusty color but also a salty taste - the fishers wrapped the water pump with gloves as a makeshift filter.

Longline fishing is an extremely labor-intensive operation. The fishers' day typically started with moving the fish in the ship's freezers, then hauling in the vessel's lines and hooks that had been set the day before. Depending on the catch, fishers reported that this task alone could take around 12 hours. After the lines, hooks and catch are retrieved, the fishers said that they continued work to de ploy th e fishing gear again, which could take another 6 hours before they could go to bed. As a result, the fishers reported that they could often only sleep for around 4 hours a day, and even if there were breaks between tasks, they had to go back to work within 10 minutes at most. The fishers reported that all of the migrant fishers slept in the same room, a crowded space with very poor hygiene and bed bugs that bit them as they slept. According to the interview, while the captain had his own bathroom, the 13 fishers had to share one toilet and could only wash themselves on the front deck with a seawater hose. They said this was the same place and hose they used to wash the blood from the fish they caught.

### The ship's long working hours based on AIS data

The fishing operation of longline vessels includes the daily setting of thousands of hooks on the vessel's longline, hauling back the line, removing fish from the hooks, sorting and stowing the catch, and more. The setting out and hauling back of the line and hooks affects the speed and direction of the fishing vessel. Therefore, the fishing hours of the crew can be estimated, or fishers' statements corroborated, by analyzing the trajectory of the fishing vessel. Data from the Vessel Monitoring System (VMS) on Taiwanese distant water fishing vessels are not accessible to the public, so we checked AIS data from GFW to verify if SHIN JYI WANG NO.6 departed Taiwan in March 2020 and returned in March 2021, as per the fishers' statement, and to understand the working hours on board during their year at sea (as shown in the upper image on p. 26).

Using AIS data from GFW,<sup>77</sup> which covers the period up to December 2020, the fishing effort<sup>78</sup> of SHIN JYI WANG NO.6 has been aggregated into hours each month as shown in the right table. Since May 2020, the monthly fishing effort had exceeded 550 hours for three

consecutive months, and in September the same year, the monthly fishing effort was as high as 659 hours, indicating that the average daily fishing time of the vessel could be as high as 22 hours, which presents a very similar picture to the extremely long working hours described by the fishers on board.

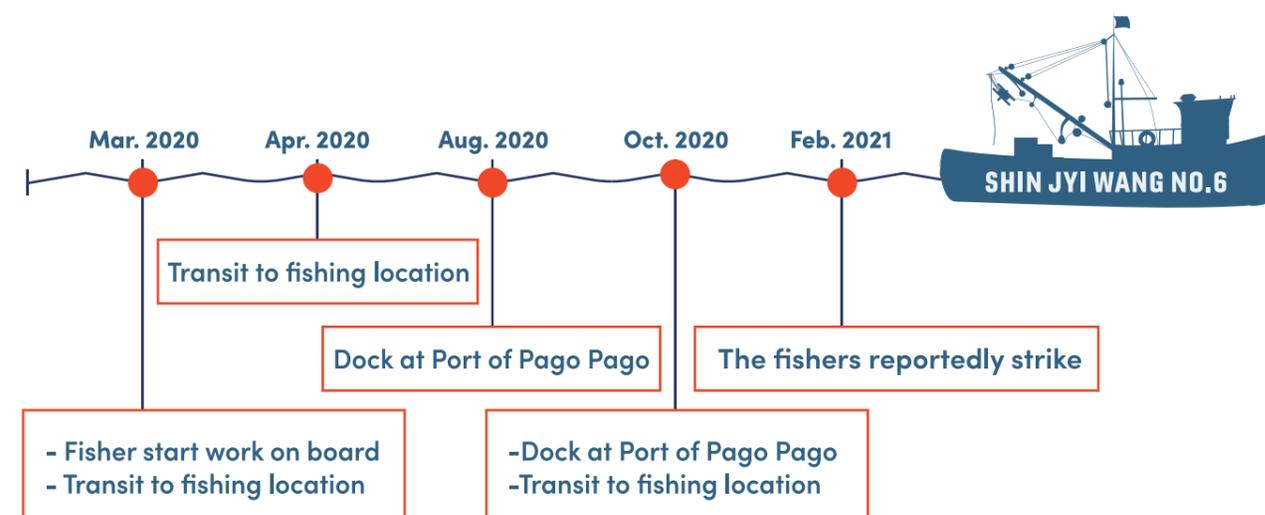
Although there were months with fewer hours of fishing effort,<sup>79</sup> the average number of fishing hours per month was still 473 hours. Furthermore, the AIS pattern of the vessel indicates only the hours spent setting and retrieving lines and hooks from the sea; it is not possible to estimate the time spent on other daily tasks from AIS data, such as sorting the catch and maintaining the basic operations of the fishing vessel.

### Fishers apparently desperate to leave the ship

Nearly a year after SHIN JYI WANG NO.6 left Taiwan in March 2020, the fishers said some of the fishers held a strike in February 2021 coinciding with a transshipment event between the fishing vessel and a carrier to transfer catch and bait. This was one of the few times during the voyage that the fishers had any possibility of leaving the ship. The fishers told the captain that they wanted to leave the vessel and that their working and living conditions needed to be improved. The fishers reported that the captain did not allow them to leave, and he verbally agreed that the vessel would return to Taiwan within 1-2 months, so the fishers resumed work. However, according to the fishers, the food situation on board did not improve for the rest of the trip, except that the galley was no longer kept locked.

### Indicators of abusing the vulnerability of fishers

According to the fishers, when SHIN JYI WANG NO.6 was on the way back to Taiwan, the manning agency called to inquire about the situation on board. The fishers said that the captain didn't allow the fishers to explain the situation to the agency, and told them to wait until they were back in Taiwan. When the vessel arrived in Taiwan, the captain reportedly changed his attitude and story when talking to the manning agency, accusing the fishers of never working, and asked to terminate their employment and repatriate the fishers. The fishers said that some of the fishers were then asked by the manning agency to sign an agreement to terminate their contracts, and without consulting the fishers deducted approx. USD 437 (NTD 13,000) from these fishers' salaries for their flight tickets. Some of them didn't want to leave, and when they proposed to stay in Taiwan to work, the agency said the cancellation fee for refunding the flight ticket was approximately USD 134 (NTD 4,000), and the passport renewal fee was reportedly around USD 300 (NTD 9,000). According to the interview, fishers who never agreed to fly home were forced to pay both a cancellation fee for flight tickets they had not wanted, as well as an inflated passport renewal fee charged by the agency that was more than 12 times the actual cost of around NTD 700.<sup>80</sup>



Month in 2020	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Fishing time (hours)	28	557	595	678	393	659	121	611	623
Fishing hour per day	0.9	18	19.8	22	12.7	22	3.9	20.4	20.1

The timeline of the event onboard and fishing effort analysis table for SHIN JYI WANG NO.6.



Fishers working on-board a Taiwanese fishing vessel. // Confidential source

### Case 3. JIN WEN NO.99

*“By the time we started to move the catch, we hadn't slept for two days. After we were done, we were exhausted. Then the captain demanded us to set the hooks next. Even when we asked if we could sleep first, the captain replied, saying “No, set the hooks!”.”*

*“The captain took out weapons from his room, which were two knives, and the fishers were all scared and hid at the front of the deck. The captain undressed and rubbed those knives against his body. We didn't know what it meant.”*

The fisher Mr. W working on JIN WEN NO.99



WCPFC

Previous Vessel Name	JIN CHANG NO.17
International Call Sign	BH3380
Registration Number	8748737
IMO number	CT6-1380
MMSI	416003647

#### The death of a fisher on board

The AIS data indicates JIN WEN NO.99 fished in the high sea during November 2020 to July 2021. Two fishers from this vessel were interviewed about their time aboard the vessel. They recalled a story of a fellow crew member, Mr. Z, who died following an unknown illness on board the vessel. According to the fishers' statements, the man began to show symptoms of the illness in 2021, initially swelling of his feet, then gradually spreading to his whole body. After being sick for a month, the fisher's illness was noticed by others, who asked the captain to provide medicine. However, the fishers said the symptoms of Mr. Z were not reduced even after medicine was provided, and it was not until the rest of the fishers held a one-day strike that the captain agreed and arranged to send the sick man back to Taiwan for treatment. Until he was sent to shore, the captain still reportedly required Mr. Z to continue assisting the other fishers' with their work. Unfortunately, the fishers said Mr. Z died of his illness after being picked up by another fishing vessel. The fishers did not know the cause of Mr. Z's death.

The living and working conditions on board JIN WEN NO.99 were harsh and unrelenting. Fisher Mr. W said that four months after the vessel left port it was already clear that there was not enough food, and when he complained to the captain, he was told to put up with it. Another fisher, Mr. N, also said there was not enough food on board. According to the fishers, much of the time, the fishers' meals consisted only of white rice with some sauce, and each fisher was given 10 packs of instant noodles every two months. The fishers said working hours

August 18, 2022

In the letter of reply from TFA, TFA stated that on May 22, 2021, JIN WEN NO.99 reported a fisher onboard feeling unwell and he was scheduled to be sent back to Taiwan by another vessel. TFA also responded that according to the autopsy certificate provided by Taiwan Pingtung District Prosecutors Office, the manner of death was natural death and the cause of death included dilated cardiomyopathy with myocardial fibrosis change and pulmonary edema.

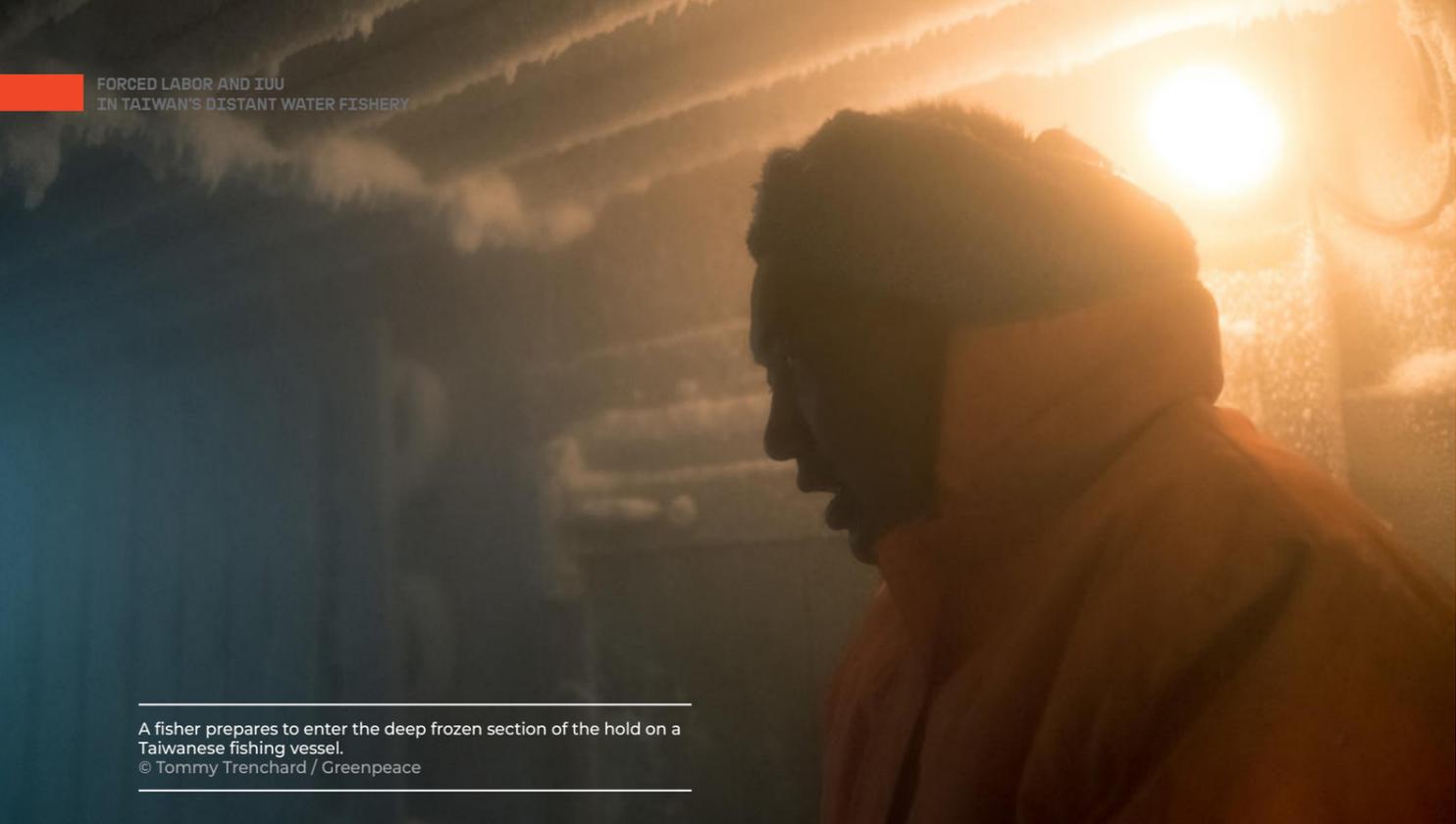
got increasingly tough during the trip: Initially, fishers were able to sleep for around seven hours a day, but after the sick fisher Mr. Z and some other fishers whose contracts had expired left the ship, the remaining fishers could only sleep for two to five hours a day. They reported there were even times when the vessel was transshipping with a carrier that the fishers had to work consecutively for two days without sleep.

#### Allegations of beatings and threats from the captain

According to the interview, on one occasion, after the fishers had worked for two days and nights in a row the captain instructed them to continue working, and the exhausted fishers held a strike to take a short break. However, the fishers said the next day when one of the fishers accidentally let a hooked fish get away, the captain suddenly began assaulting the fisher, and others close by him were also struck. After other fishers separated the captain from the fishers he had assaulted, the captain reportedly went to his cabin and took out two knives, one that was used for cutting shark fins and one for cutting fish. Most fishers were so scared that they ran away from the captain. After the violent incident, the fishers said that all the fishers demanded to terminate their contracts, and the captain reportedly returned to Taiwan after obtaining the fishers' consent to pay them less than their original salaries and also deduct subsequent food expenses from their salaries. After returning to Taiwan, the fishers called the police, and to avoid trouble with the law, the manning agency paid them the amount deducted from their salaries.

August 18, 2022

In the letter of reply from TFA, TFA reported the event of beatings and threats from the captain to the police on August 24, 2021. On September 11, 2021, the National Police Agency of the Ministry of the Interior replied to TFA the investigation result, identifying the fisher not a victim of human trafficking. On June 23, 2022, Fongshan Investigation Branch of Coast Guard Administration under the Ocean Affairs Council also replied to TFA that evidence of human trafficking was not identified. TFA also claimed that two fishers on JIN WEN NO.99 were interviewed on April 21, 2022 and July 7, 2022, and fishers said they did not observe any beating or verbal abuse on the vessel. TFA responded that the fisher's statement was very different from the captain's, so TFA could not make a judgement.



A fisher prepares to enter the deep frozen section of the hold on a Taiwanese fishing vessel.  
© Tommy Trenchard / Greenpeace

## The Exploitative Nature of Distant Water Fishing

The cases presented here may only represent the tip of the iceberg in terms of forced labor, human rights abuses and IUU fishing in Taiwan's distant water fishing industry.

In this study, Greenpeace East Asia investigated a total of 24 Taiwanese or Taiwanese-related distant water fishing vessels through interviews with the fishers on board. The conditions and situations described by individual fishers were then assessed against the 11 ILO forced labour indicators (A description of each indicator and the list of corresponding situations described by the fishers are detailed in Appendix III). Among the fishers interviewed, the most commonly experienced indicators of forced labor were the withholding of wages (indicator 8) and retention of identity documents (indicator 7). These were followed by abuse of vulnerability (indicator 1), excessive overtime (indicator 11) and abusive working and living conditions (indicator 10). In total, five of them were identified with only one ILO indicator while 23 of them were identified with more than four indicators.

### Withholding wages and personal identity documents is still reported to be common practice

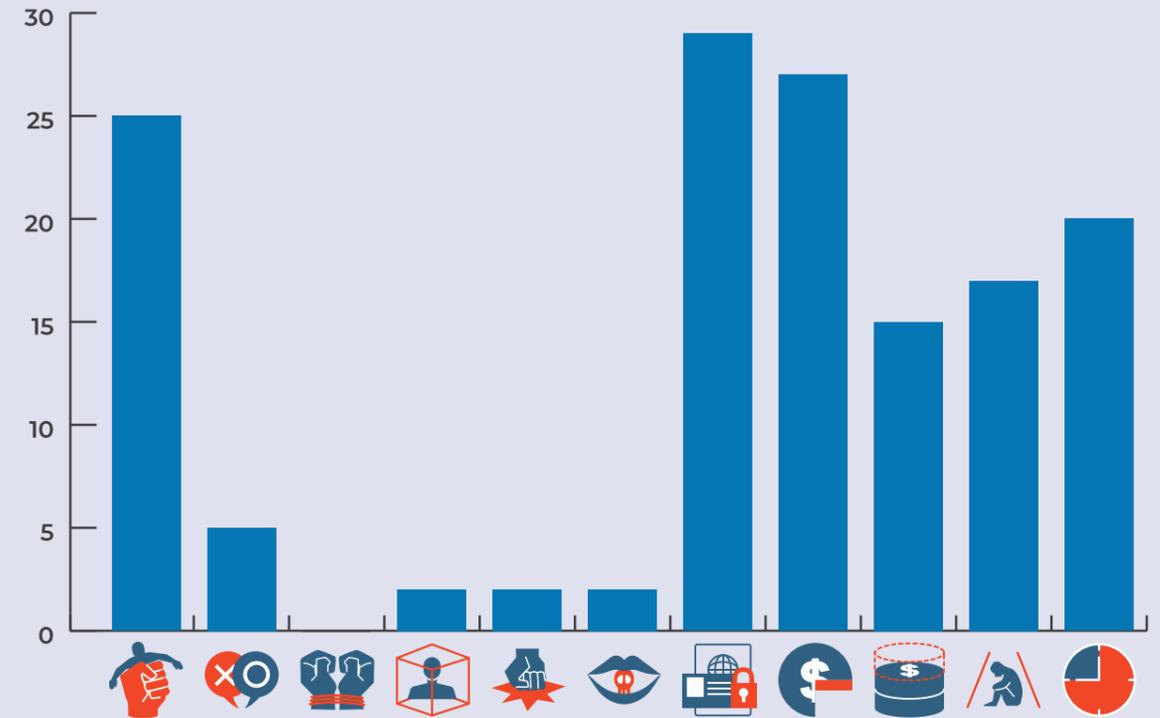
Vessel operators or manning agencies often withhold their wages or confiscate the passports

of fishing crew as means to deter or prevent fishers from terminating their contracts early, or leaving the vessel for better job prospects elsewhere. Both these practices have been identified by the ILO as indicators of forced labor. In this study, we found that these were the two most common forced labor practices that the interviewed fishers faced— withholding wages was reported by 27 of the 37 fishers that were interviewed while confiscating personal identity documents was reported by 26 of the 37 interviewed fishers. The prevalence of these practices is consistent with the findings from Greenpeace East Asia's 2020 report *Choppy Waters*,<sup>81</sup> and Greenpeace Southeast Asia's 2021 report *Forced Labor at Sea*,<sup>82</sup> which also showed that these two practices are rife in the distant water fishing industry.



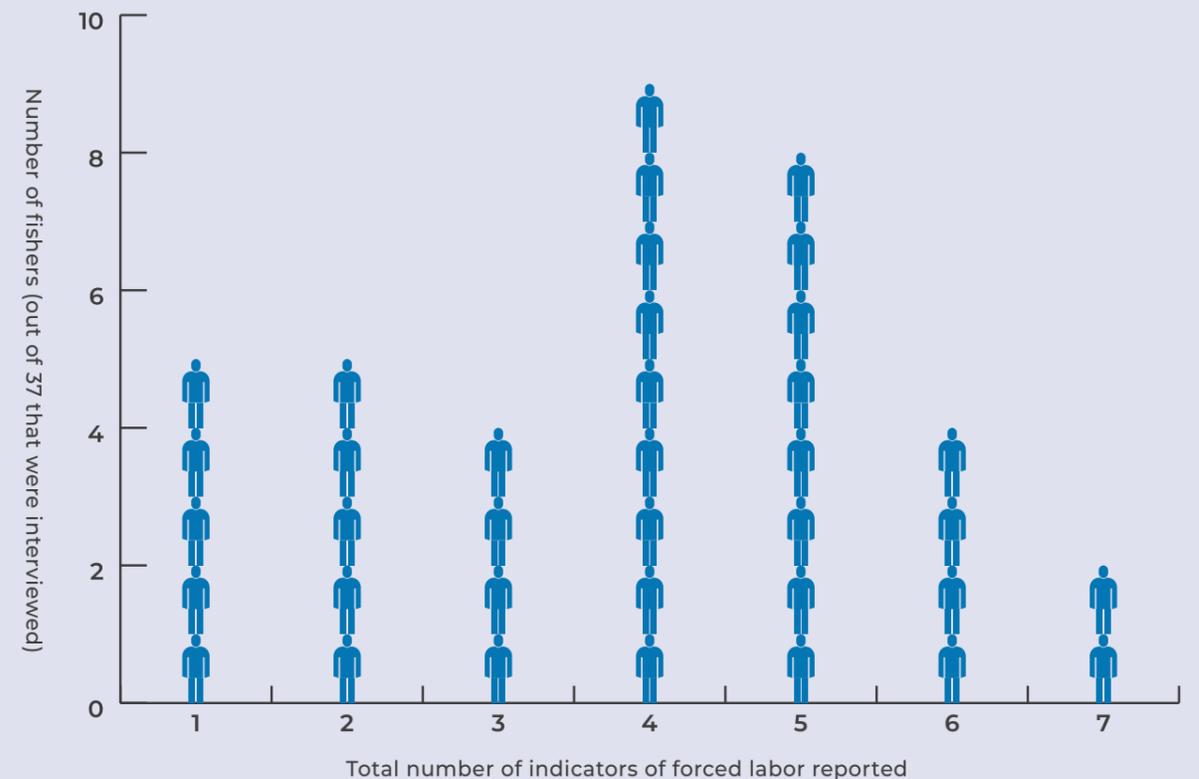
A "squat toilet" on a Taiwanese vessel. © Greenpeace

## The number of each ILO forced labor indicator that interviewed fishers reported having experienced



**Note.** Since the number of fishers interviewed for each fishing vessel ranges from one to five, the frequency of each indicator refers to the number of interviewed fishers that report the experience.

## The number of interviewed fishers that reported experiencing 1-7 ILO indicators of forced labor



## The ILO forced labor indicators that fishers reported having experienced on 24 Taiwanese-related fishing vessels

Vessel Name	Flag	IMO	# of interviewed fishers	supplied tuna to FCF/ Bumble Bee	ILO Indicators 1-4			
					1	2	3	4
CHUN I NO.217	TW	8748842	1					
CHUNG KUO NO.828	PA	8652811	1					
DE CHAN NO.116	TW	9826029	1	V	●			
EAGLE	TW	8780814	2	V				
HUNG HUI NO.112	TW	8430330	2		●			
JIA YU FA	TW	8543694	2					
JIN CHUAN YI	TW	8535491	1		●			
JIN WEN NO.99	TW	8748737	3		●			
JIUN MING SHING NO.21	TW	8557176	1		●			
JUBILEE	TW	9790024	1	V				
MAN CHI FENG	TW	8777790	2		●			
REN HORNG CHUN NO.168	TW	9891969	1	V	●			
REN HORNG WAY NO.368	TW	9822891	4	V	●			
SHANG SHUN NO.622	TW	9198147	1					
SHENG I TSAI NO.313	TW	8540678	2		●			
SHENG I TSAI NO.368	TW	8545410	2		●			
SHENG JYI HUEI NO.16	TW	8541177	1		●			
SHENG YU NO.38	TW	8792477	1					
SHIN JYI WANG NO.6	TW	8792685	2		●			●
SHIN YUA FU NO.111	TW	8540991	1		●			
YI FENG NO.816	TW	8792623	1		●	●		
YI MAN	TW	8777879	1	V				
YU HSING HSIANG NO.168	TW	8674857	5		●	●		
ZHEN FENG NO.8	TW	8530714	1		●			

ILO Indicators 5-11											# of indicators present on vessel
5	6	7	8	9	10	11					
●	●										2
			●								1
		●	●	●	●	●					6
		●	●		●	●					4
		●	●	●							4
					●						1
		●	●	●		●					5
●	●		●	●	●	●					7
											1
		●	●			●					3
		●	●	●	●	●					6
		●	●	●		●					5
		●	●	●		●					5
			●		●	●					3
		●	●	●		●					5
		●	●	●	●	●					6
		●	●		●						4
			●								1
		●	●	●	●	●	●	●	●		7
		●	●	●	●	●					6
		●	●	●							5
		●				●			●		2
		●	●	●	●	●		●	●		6
			●				●				2

**Note.** 1.Vessels are listed in alphabetical order.  
 2.Flag TW refers to Taiwan, and PA refers to Panama.  
 3.The table is organized based on the interviews with fishers and copies of contracts. For those without marking, it means no evidence was found of that indicator being present on board.

4.Greenpeace East Asia and Greenpeace USA had offered FCF, Bumble Bee and owners of the aforementioned 24 fishing vessels opportunities to comment. While FCF, Bumble and owners of CHUN I NO.217, EAGLE, JIN WEN NO.99, JUBILEE, MAN CHI FENG, YI FENG NO.816 and ZHEN FENG NO.8 did not respond to the inquiry until the publication of this report, owners of CHUNG KUO NO.828, REN HORNG CHUN NO.168, REN HORNG WAY NO.368 and YU HSING HSIANG NO.168 said they were not able to verify the allegations. Owners of the remaining 13 fishing vessels denied all allegations.



USA activists head to Bumblebee headquarters in San Diego in 2021 with more than 25,000 consumer petitions demanding protection of human rights and oceans. © Sandy Huffaker Jr. / Greenpeace

## CONCLUSIONS AND RECOMMENDATIONS

Bumble Bee, as a long-established and familiar canned tuna brand in the US, has an estimated quarter share of the US canned tuna market<sup>83</sup>. FCF, the parent company of Bumble Bee, is more than just a tuna supplier. It is also deeply involved in the production of tuna products, and integral to Taiwan's distant water fishing sector<sup>84</sup>. Between them, these two companies hold great power - over the health of our ocean, over the lives of fishers at sea, and over consumer choices in one of the biggest tuna importing countries in the world - the United States.<sup>85</sup> But with great power comes great responsibility, and currently, neither of those companies is meeting its responsibilities.

This investigation has revealed that the information provided by Bumble Bee to its customers is incomplete, in some cases it is inconsistent with our analysis results, and in a number of cases the company's own information shows it was sourcing fish from vessels that had engaged in or were suspected of IUU fishing, forced labor or human rights abuses.

Among 119 Taiwanese-flagged vessels investigated, there were 28 in which information provided by Bumble Bee on the fishing area where its tuna was sourced contradicted official information from the TFA on where the supply vessel was authorized to fish.

In all such cases, verifying the vessel location against a third data source (AIS data from Global Fishing Watch) revealed that it was corroborated the TFA information. In at least eleven cases, this incorrect reporting meant that the product contained tuna caught from a location where overfishing was occurring, but the company claimed it was tuna from a healthier stock.

In several cases, the information shared by Bumble Bee on the Trace My Catch website revealed the company sourced tuna from vessels with published links to IUU fishing and/or forced labor. These cases were identified by cross-checking Bumble Bee's traceability information against readily available sources that Bumble Bee and FCF themselves should have consulted, to uphold their own policies on avoiding IUU and forced labor:

- Information on Trace My Catch showed that Bumble Bee had sourced tuna from a vessel, DA WANG, that Greenpeace Southeast Asia had revealed, US CBP had confirmed, and Taiwanese authorities were prosecuting for forced labor and human trafficking. One of the fishers on board DA WANG was reportedly beaten and died during a 2019 fishing trip supplying Bumble Bee, and even after the US CBP has determined that Da Wang use forced labor in their operations and seized further imports from the vessel,

Bumble Bee cans containing tuna from that ill-fated voyage were for sale on US supermarket shelves.

- The Trace My Catch website also included details of tuna sourced by Bumble Bee from fishing vessels that appear on the official TFA list of vessels with IUU violations ("The Statistics of Infringements and Sanctions of the DWFA") in the past five years. With company policies prohibiting IUU activities, a Taiwanese parent company, and the majority of its supplies sourced from Taiwanese vessels, it should be a fundamental step for Bumble Bee to regularly monitor the TFA's list of violations to avoid sourcing from vessels involved in IUU fishing.

Further investigation, in the form of interviews with fishers working on Taiwanese-flagged and -owned distant water fishing vessels, including six vessels supplying Bumble Bee, revealed evidence of yet

more instances of suspected IUU fishing (including alleged shark finning and illegal transshipment) and forced labor conditions. All 37 cases in this report were identified with at least one of the ILO indicators of forced labor, and over half of the fishers had experienced or observed four or more of the 11 indicators. While most of the fishers interviewed had reported both their wages withheld and identity documents retained, experiencing harsh living and working conditions such as lack of food and sleep was also highly relevant.

Both Bumble Bee<sup>86</sup> and FCF<sup>87</sup> have policies on sustainability and corporate social responsibility that are supposed to extend through their supply chains. However, these findings raise serious doubts about the level of commitment the companies have to their own policies on IUU fishing and forced labor, and their responsibility towards their customers.



**Greenpeace East Asia calls on Bumble Bee and FCF to urgently undertake the following actions to address issues of unsustainable practices, illegality, and forced labor in their supply chains:**

- ★ **Immediately issue an apology to the exploited fishers, retailers and consumers to whom they sold tuna from a vessel even after forced labor and human trafficking was confirmed on its fishing trip.**
- ★ **Immediately remove products involved with vessels suspected of IUU fishing and forced labor revealed in this report from the US market, and temporarily stop trading with those suppliers, pending a full and independent investigation.**
- ★ **Immediately cross-check the full list of supply vessels and companies against official lists of IUU violations and forced labor cases and terminate any existing business with such suppliers, to ensure that no further trade occurs with suppliers that have been found to engage in those illegal practices.**
- ★ **Immediately disclose to the public a complete list of their supplying fishing vessels, carriers, manufacturers, brands and receive third party verification to ensure that customers and consumers have sufficient and accurate information to make their buying decisions.**
- ★ **Immediately establish an independent investigation committee to investigate the flaw of Trace My Catch and disclose to the public within six months the findings and a time-bound plan to phase out IUU and forced labor in their supply chains.**
- ★ **Establish within 90 days an effective at-sea workers' grievance mechanism based on the United Nations Guiding Principles on Business and Human Rights (UNGP), and as a prerequisite to trading with any potential suppliers.**
- ★ **Revise their human rights policies within 90 days to accord with international standards and best practices, including zero recruitment fees and deposits, and regular pay as required under ILO Work in Fishing Convention (ILO C188)<sup>88</sup>, equality and non-discrimination under the ILO Migrant Worker Conventions, and the ILO core labor standards, including the rights to freedom of association and collective bargaining guaranteed under ILO Convention Nos. 87 and 98.<sup>89</sup>**
- ★ **Announce within 90 days a time-bound plan to phase out transshipment at sea, including but not limited to stop procuring fish from fishing vessels that conduct transshipment at sea, and end any contracts with suppliers that do not follow that policy.**

## APPENDIX I.

### CODES USED FOR INTERVIEWED FISHERS AND THE CORRESPONDING FISHING VESSEL

No.	Vessel name	Code of fisher	Quote in this report from the interview
1	DE CHAN NO.116	Mr. D	"We sleep only 3 to 4 hours a day." "Because the freezer of another fishing vessel was smaller, the fish was moved four times at sea."
2	EAGLE	Mr. E	"It was very cold when we were working, but no raincoat was provided on board." "We only had two meals a day, and if we were hungry, we cooked the tail of the tuna to eat."
3	JIN WEN NO.99	Mr. W	"By the time we started to move the catch, we hadn't slept for two days. After we were done, we were exhausted. Then the captain demanded us to set the hooks next. Even when we asked if we could sleep first, the captain replied, saying "No, set the hooks!"." "The captain took out weapons from his room, which were two knives, and the fishers were all scared and hid at the front of the deck. The captain undressed and rubbed those knives against his body. We didn't know what it meant."
		Mr. Z	(The deceased fisher who worked on JIN WEN NO.99.)
4	JUBILEE	Mr. J	"We worked at least 16 hours a day, and sometimes our work started at 1 pm and ended at 5 am the next day."
5	SHIN JYI WANG NO.6	Mr. S	"During the year I was on this vessel, I ate uncooked instant noodles for breakfast and lunch, and only got rice to eat at night. The filtered water we drank was sometimes brown, which tasted bad and made us sick." "Many things, including medicines, food, and fruits on the vessel were either expired or moldy, and even the instant noodles provided were expired already."

(Vessels are listed in alphabetical order.)

## APPENDIX II.

### VIOLATIONS UNDER THE ACT FOR DISTANT WATER FISHERIES BY VESSELS HAVE SUPPLIED BUMBLE BEE

No.	Vessel Name	Flag	Trip supplying Bumblebee (start)	Trip supplying Bumblebee (end)	Penalty charge date	Violations
1	CHIUAN FA CHENG NO.166	Taiwan	Jul. 13, 2020	Sep. 13, 2020	Oct. 15, 2021	Serious misreporting of bigeye tuna catches between Feb. 26 to Apr. 14, 2018.
2	DER HAE NO.3	Taiwan	Mar. 1, 2020 Dec. 29, 2020	May. 23, 2020 Feb. 3, 2021	Jan. 26, 2018	Failed to keep vessel markings identifiable.
3	DER HAE NO.66	Taiwan	Mar. 20, 2020	Jun. 25, 2020	Nov. 29, 2018	Serious misreporting of yellowfin and bigeye tuna catches from Oct. 20, 2017 to Feb. 4, 2018.
4	FAIR WELL NO.707	Taiwan	Nov. 24, 2020 Mar. 9, 2021	Dec. 14, 2020 Apr. 14, 2021	Jun. 28, 2021	Setting nets targeting fishes swimming with sei whales.
5	HUNG FU NO.88	Taiwan	Dec. 24, 2020	Apr. 20, 2021	Feb. 12, 2018	Significant misreporting
6	JIN CHANG NO. 17 (current name: JIN WEN NO.99)	Taiwan	Sep. 1, 2019	Oct. 17, 2019	Apr. 20, 2018 May 13, 2020	Serious misreporting of blue shark catches from Jun. 21, 2017 to Mar. 2, 2019. Storage bodies and fins of sharks without naturally attached or tied from May 26, 2019 to Mar. 3, 2020. <sup>90</sup>
7	JUBILEE	Taiwan	May. 5, 2020	Aug. 7, 2020	Jan. 18, 2018	Conducted unauthorized (by the TFA) landing in port via a carrier. Serious misreporting of yellowfin tuna catches from May 26 to Aug. 24, 2018.
8	LONG WANG SHENG	Taiwan	Dec. 16, 2020	Feb. 9, 2021	May. 27, 2020	Misreporting of yellowfin tuna catches.
9	LONG WANG SHENG NO.7	Taiwan	Dec. 16, 2020	Feb. 10, 2021	May. 27, 2020	Serious misreporting of yellowfin tuna catches.
10	NEW FAIR DISCOVERY NO.707	Taiwan	Mar. 28, 2021	Apr. 13, 2021	Apr. 13, 2021	Misreporting of catches.
11	RUI JIN FA	Taiwan	Nov. 8, 2020	Apr. 24, 2021	Oct. 13, 2020	Serious misreporting of bigeye tuna catches from Mar. 15 to May 7, 2018.
12	SHENG FAN NO.119	Taiwan	Feb. 25, 2020	Aug. 13, 2020	Jun. 29, 2020	Misreporting of bigeye tuna, yellowfin tuna and southern bluefin tuna catches on the e-logbook.
13	YING YONG HSIANG	Taiwan	Dec. 28, 2020 Feb. 10, 2021	Jan. 23, 2021 Apr. 17, 2021	Jul. 8, 2021	Violation of notification for landing in port.

**Note.** 1.Vessels are listed in alphabetical order.

2.The TFA did not reveal the date information in all the violation cases.

## APPENDIX III.

### ENCOUNTER DETAILS OF DE CHAN NO.116 AND DE CHAN NO.26

Date	Mar. 19, 2020	Mar. 15, 2021
Longitude of encounter	175°48'00.0"E	161°30'00.0"W
Latitude of encounter	7°30'00.0"N	3°54'36.0"S
Ocean	Pacific	Pacific
Distance between vessels	Under 500 meters	Under 500 meters
Speed of vessels	Below 2 knots	Below 2 knots
Start time of encounter (UTC)	19:22	05:21
End time of encounter (UTC)	23:00	09:52
Duration	3 hrs and 38 mins	4 hrs and 31 mins

Data source: Global Fishing Watch and Spire

## APPENDIX IX.

### CONDITIONS AND SITUATION REPORTED BY FISHERS THAT MET THE ILO DESCRIPTIONS OF FORCED LABOR INDICATORS

ILO forced labour indicator	ILO's description of that indicator <sup>91</sup>	Experiences or observations reported by fishers in this study
<p>1. Abuse of vulnerability</p> 	<p>People who lack knowledge of the local language or laws, have few livelihood options, belong to a minority religious or ethnic group, have a disability or have other characteristics that set them apart from the majority population are especially vulnerable to abuse and more often found in forced labor.</p> <p>When an employer takes advantage of a worker's vulnerable position, for example, to impose excessive working hours or to withhold wages, a forced labor situation may arise.</p>	<ul style="list-style-type: none"> <li>● Being unfamiliar with relevant Taiwanese laws and regulations and their own rights, the fishers signed work contracts that were in violation of provisions in the Overseas Employment Regulations.</li> <li>● Not being aware of their right to have copies of the labor contracts they signed with the vessel operator and the service contracts they signed with the Taiwanese manning agency, most fishers only had copies of contracts with foreign manning agencies.</li> <li>● Being forced to sign documents in foreign languages that they are not familiar with.</li> <li>● Being charged unreasonably high administrative fees, such as the passport fee and flight cancellation fees for flights they did not request.</li> <li>● Being transferred to another fishing vessel which is owned by the same company without signing a new contract.</li> <li>● Being told they are employed illegally and they should not leave port.</li> </ul>
<p>2. Deception</p> 	<p>Deception relates to the failure to deliver what has been promised to the worker, either verbally or in writing. Victims of forced labor are often recruited with promises of decent, well paid jobs. But once they begin working, the promised conditions of work do not materialize, and workers find themselves trapped in abusive conditions without the ability to escape. In these cases, workers have not given free and informed consent. Had they known the reality, they would never have accepted the job offer.</p>	<ul style="list-style-type: none"> <li>● Being put to work on fishing vessels that were not the same ones as specified on their contracts.</li> <li>● Being promised to change to another job, but instead being sent back to their home countries following accusations by the vessel owners of breaking their contracts.</li> </ul>
<p>3. Restriction of movement</p> 	<p>If workers are not free to enter and exit the work premises, subject to certain restrictions which are considered reasonable, this represents a strong indicator of forced labor.</p>	<ul style="list-style-type: none"> <li>● Not being allowed to leave or get off the vessels when in port. (This situation was not found in the field investigation described in this report, but the situation was identified in the Greenpeace Southeast Asia report Forced Labor at Sea in 2021)</li> </ul>

ILO forced labour indicator	ILO's description of that indicator <sup>91</sup>	Experiences or observations reported by fishers in this study
<p>4. Isolation</p> 	<p>Workers may not know where they are, the worksite may be far from habitation and there may be no means of transportation available. But equally, workers may be isolated even within populated areas, by being kept behind closed doors or having their mobile phones or other means of communication confiscated, to prevent them from having contact with their families and seeking help.</p>	<ul style="list-style-type: none"> <li>● Not being allowed to freely communicate with the manning agency when the latter called to inquire about how the fishers were mistreated on board.</li> </ul>
<p>5. Physical and sexual violence</p> 	<p>Forced laborers, their family members, and close associates may be subjected to actual physical or sexual violence. Violence can include forcing workers to take drugs or alcohol so as to have greater control over them. As violence is not acceptable as a disciplinary measure under any circumstances, it is a very strong indicator of forced labor.</p>	<ul style="list-style-type: none"> <li>● Being physically assaulted by the captain or senior crew on board.</li> </ul>
<p>6. Intimidation and threats</p> 	<p>Victims of forced labor may suffer intimidation and threats when they complain about their conditions or wish to quit their jobs. In addition to threats of physical violence, other common threats used against workers include denunciation to the immigration authorities, loss of wages or access to housing or land, sacking of family members, further worsening of working conditions, or withdrawal of “privileges” such as the right to leave the workplace. Constantly insulting and undermining workers also constitutes a form of psychological coercion, designed to increase their sense of vulnerability.</p>	<ul style="list-style-type: none"> <li>● When requesting the termination of their contract, being told that they are not allowed to go back to their home countries, or will have their deposit withheld.</li> <li>● Witnessing the beating of fellow fisher(s) by the captain and feeling threatened by it.</li> <li>● Having the captain brandish knives to intimidate and scare the crew into compliance.</li> </ul>
<p>7. Retention of identity documents</p> 	<p>The retention by the employer of identity documents or other valuable personal possessions is an element of forced labor if workers are unable to access these items on demand and if they feel that they cannot leave the job without risking their loss. In many cases, without identity documents, the worker will not be able to obtain other jobs or access essential services, and may be afraid to ask for help from authorities or NGOs.</p>	<ul style="list-style-type: none"> <li>● Having their identity documents, such as passports, confiscated by the captains or the manning agencies, and being denied access to those documents.</li> </ul>

ILO forced labour indicator	ILO's description of that indicator <sup>91</sup>	Experiences or observations reported by fishers in this study
<p>8. Withholding of wages</p> 	<p>Workers may be obliged to remain with an abusive employer while waiting for the wages that are owed to them. The fact of irregular or delayed payment of wages does not automatically imply a forced labor situation. But when wages are systematically and deliberately withheld as a means to compel the worker to remain, and deny him or her of the opportunity to change employer, this points to forced labor.</p>	<ul style="list-style-type: none"> <li>● Having part of their wages deducted monthly in the name of a deposit, and if the fishers terminated their contract early, this deposit would not be returned and instead be used for a transportation fee for sending them back home.</li> </ul>
<p>9. Debt bondage</p> 	<p>Forced laborers are often working in an attempt to pay off an incurred or sometimes even inherited debt. The debt can arise from wage advances or loans to cover recruitment or transport costs or from daily living or emergency expenses, such as medical costs. Debt bondage – or bonded labor – reflects an imbalance in power between the worker-debtor and the employer-creditor. It has the effect of binding the worker to the employer for an unspecified period of time, anything from a single season, to years, or even successive generations. It bears no resemblance to taking a “normal” loan from a bank or other independent lender, for repayment on mutually agreed and acceptable terms</p>	<ul style="list-style-type: none"> <li>● Being charged recruitment or transportation fees, requiring the fishers to take loans from the manning agencies and resulting in deductions from their monthly wages.</li> </ul>
<p>10. Abusive working and living conditions</p> 	<p>Forced labor victims are likely to endure living and working conditions that workers would never freely accept. Work may be performed under conditions that are degrading (humiliating or dirty) or hazardous (difficult or dangerous without adequate protective gear), and in severe breach of labor law. Forced laborers may also be subjected to substandard living conditions, such as being made to live in overcrowded and unhealthy conditions without any privacy.</p>	<ul style="list-style-type: none"> <li>● Living in small, crowded, humid, and hot conditions with only curtains but no doors nor air-conditioning.</li> <li>● Only being provided dirty drinking water.</li> <li>● Receiving insufficient, expired and/or moldy food.</li> <li>● Not being given medical resources or treatment.</li> <li>● Not being provided with necessary work-related protective clothing, such as warm clothes for entering the cold storage, rain coats and gloves, or having to pay to use them.</li> <li>● Not having access to a shower room, only being able to shower on the open deck with seawater.</li> <li>● Being required to work even when sick.</li> </ul>
<p>11. Excessive overtime</p> 	<p>Forced laborers may be obliged to work excessive hours or days beyond the limits prescribed by national law or collective agreement. They can be denied breaks and days off, having to take over the shifts and working hours of colleagues who are absent, or by being on call 24 hours a day, 7 days a week.</p>	<ul style="list-style-type: none"> <li>● Being required to work for more than 12-14 hours at a time; some fishers did not get sleep for two consecutive days.</li> <li>● Being only allowed scarce resting hours that were, on average, far below than the minimum 10 hours of rest per day required in the Overseas Employment Regulations.</li> </ul>

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22. P.L. 71-361 (March 13, 1930), §307; 46 Stat. 590, 689, codified as amended at 19 U.S.C. §1307.
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26. AIS was originally developed as a safety precaution to avoid vessel collisions, though its use has evolved to many other applications including detection of illicit activities at sea. The use of AIS for such purposes may be undermined by "AIS spoofing", which is a limitation of the analysis in this report. AIS spoofing is described here: <https://windward.ai/blog/ais-spoofing-new-technologies-for-new-threats/>
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35. Some tuna products with different codes shared the same tuna batch indicating they were supplied from the same fishing trips. These duplications are not included in the total.
36. The authorization date was only obtained for Taiwanese-flagged fishing vessels from the TFA, so the first and second analyses excluded 22 Taiwanese-owned fishing vessels that were flagged in other countries.
37. Taiwan Fisheries Agency. <https://www.fa.gov.tw/>
38. Trygg Mat Tracking. <https://www.tm-tracking.org/>
39. Spyglass, Global Fishing Crimes Map. <https://spyglass.fish/>
40. International Maritime Organization (IMO) vessel number 8996138.
41. According to Trace My Catch, most of the South Pacific Ocean Albacore are caught near the Solomon Islands, Vanuatu and Fiji, with a smaller amount caught near the Cook Islands and Tahiti. Of those fishing areas, only Tahiti is located in the overlapping area under WCPFC and IATTC while the others are located in the area under WCPFC.
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50. Council of Agriculture, Executive Yuan, Taiwan. Regulations for Tuna Longline Fishing Vessels Proceeding to the Indian Ocean for Fishing Operation. <https://law.moj.gov.tw/LawClass/LawAll.aspx?pcode=M0050059>
51. Council of Agriculture, Executive Yuan, Taiwan. Regulations for Tuna Longline Fishing Vessels Proceeding to the Atlantic Ocean for Fishing Operation. <https://law.moj.gov.tw/LawClass/LawAll.aspx?pcode=M0050057>
52. Article 13 of DWF Act: "Any person with the nationality of the Republic of China shall not conduct any of the following serious infringements: (1) Conducting distant water fisheries without the fishing license or the distant water fisheries permit referred to in Article 6, paragraph 1, or conducting distant water fisheries during the period of the execution of suspension of the fishing license...and (3) Conducting transshipment at-sea, in-port or landing in-port without the authorization of the competent authority, in violation of Article 11, paragraph 1..." <https://law.moj.gov.tw/ENG/LawClass/LawAll.aspx?pcode=M0050051>
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