



Summary Report: A study into the implementation of responsible recruitment practices and the Employer Pays Principle (EPP) in the global tuna processing sector.

April 2025

Version 2

1. Purpose and scope of study

The global tuna industry is heavily reliant on migrant labour at every stage of production. However, the journey to employment for many of these workers is fraught with risks, particularly in the recruitment process. Many migrant workers, especially those in tuna processing, incur significant recruitment fees and related costs¹, including payments to brokers or expenses for travel and visas. These financial burdens can lead to debt, rendering migrant workers vulnerable to exploitation.

Despite international standards that advocate for the Employer Pays Principle (EPP)—stating that employers should bear these costs—the “worker pays” model continues to dominate in source countries. And despite major seafood buyers and industry associations publicly committing to the EPP or endorsing it, migrant workers in seafood supply chains continue to pay fees to secure a job. British Retail Consortium (BRC), Food Network for Ethical Trade (FNET), Global Tuna Alliance (GTA), SeaBOS, Seafood Ethics Action Alliance (SEA Alliance) (referred to as “participating organisations”), and other contributing partners² have commissioned this study to understand the current state of EPP implementation in the sector, identify the barriers to responsible recruitment and EPP implementation³ and generate practical recommendations for how supply chain stakeholders can work together to overcome these challenges.

This summary report provides a concise overview of the key information and findings from the full-length report. For more detailed insights, please refer to the complete unabridged version.

2. Methodology & Limitations

This study incorporates perspectives from all levels of the supply chain, including buyers, their industry associations, and suppliers, while also capturing the viewpoints of external stakeholders such as civil society organizations, international bodies, and government agencies. Data was collected primarily through informant interviews, document review, and desktop research. A specific set of criteria was developed to evaluate EPP commitments and their implementation. The study included three buyers and five processing sites, which are anonymized using a numbering system (e.g., “buyer 1” or “processing site 2”). Please note

¹ See: https://publications.iom.int/system/files/pdf/MWG-Tool-3-%20guidance-notes_0.pdf

² Marks & Spencer, Co-op, Tri Marine, Sainsbury's, SeaBOS, World Wise Foods, Princes, Waitrose, Asda Caterers Choice Ltd

³ This report alludes to both responsible recruitment and EPP. For the purposes of this report, the distinction between the two terms is as follows:

- **Responsible recruitment** refers to the broad range of measures taken by companies to promote fair and ethical practices throughout the recruitment process, encompassing policies, due diligence, and remediation efforts.
- **EPP** goes a step further and specifically entail commitments by companies to ensure that no worker within their supply chain bears the financial burden of any recruitment fees and related costs, in accordance with the ILO's definition.³

that the terms "supplier" and "processing site" are used interchangeably throughout this summary report. Please see the full-length report for an overview of the study's limitations.

3. EPP – Why does it matter?

Key principles governing responsible recruitment are rooted in international standards.⁴ In addition, there are several current and forthcoming legislations pertaining to human rights and forced labour at regional and country levels, which relate to responsible recruitment. Legislation across the UK, EU, and US is tightening to require greater levels of human rights due diligence, with greater penalties for non-compliance. Adopting responsible recruitment practices is vital for companies to align with these regulations and uphold labour rights throughout their operations and supply chains.

The legal frameworks of the five countries analysed in this study⁵ show varying strengths across key areas relevant to responsible recruitment, including alignment with Employer Pays Principle (EPP) standards, protections for migrant workers, regulation of recruitment agencies, and access to state-based remedy. These variations can play an important role in enabling or hindering the effective implementation of responsible recruitment practices. Across all five countries, adequate enforcement was identified as a key challenge.

While the legal frameworks in source countries for migrant workers are also important, they were outside the scope of this study.

4. What are the barriers to implementation

Despite policies outlining commitments to EPP, tuna buyers and suppliers face significant obstacles in implementing responsible recruitment in practice. Many of these obstacles are financial. Implementing EPP carries significant costs and burdens for suppliers, who often operate in a market plagued by thin margins, with buyers unwilling or unable to share the financial burden. Implementation is also hindered by the complex nature of seafood supply chains, with buyers lacking sufficient oversight and leverage to encourage their suppliers to adopt EPP. Recruitment agencies similarly confront obstacles, grappling with limited financial resources and expertise, while navigating government corruption, weak labour laws, and unscrupulous labour intermediaries. Buyers and suppliers also highlighted the challenges of understanding the "true" cost of recruitment, which is critical to ensuring that responsible recruitment is embedded as a cost of doing business.

The study revealed a lack of sufficient commercial or regulatory pressure or incentives for

⁴Please see: [The UN Guiding Principles on Business and Human Rights \(UNGPs\)](#) ; [ILO General Principles and Operational Guidelines for Fair Recruitment](#); [OHCHR International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families](#); [OECD Guidelines for Multinational Enterprises \(2011 Edition\)](#).

⁵ The Seychelles, Mauritius, the Maldives, Thailand, and the Philippines.

many actors in the supply chain to fully commit the resources necessary to full implementation. The industry associations in scope of this study do not have enforceable standards or commitments in place around responsible recruitment or EPP, and as a result, there are no processes in place within any of these associations to conduct due diligence checks on members in these areas.

Interview respondents also expressed a slight degree of scepticism in the fundamental principle of the EPP. Some buyers and suppliers expressed concerns that implementing the Employer Pays Principle (EPP) could have unintended negative consequences. For example, one supplier raised the issue that migrant workers might abscond after companies have covered their recruitment costs, resulting in financial losses for the employer. Additionally, they worried that introducing a remediation policy could lead to a surge in fraudulent claims. Similarly, a Mauritian export association voiced concerns that remediating illegal fees, particularly those paid as bribes to home country agents, might inadvertently perpetuate unethical practices, effectively "feeding the monster" rather than eliminating the root of the problem.

5. What are the ingredients for success?

Buyers' perspective

The study identified a number of positive practices being implemented at various levels of the tuna supply chain to drive the implementation of more responsible recruitment practices. Impactt has also presented possible solutions areas based on its own experience of working with various clients to address these issues. At the buyer level, this included:

- **Establishing a system to monitor supplier's performance:** One buyer (Company 3) tied KPIs to suppliers' efforts in implementing responsible recruitment rather than on fixed targets on the elimination of recruitment fees, acknowledging the long-term nature of EPP implementation.
- **Implementing accessible grievance channels:** Many buyers have grievance mechanisms in place for their direct employees, but ensuring accessible and effective grievance channels for workers across supply chains remains a challenge. One approach companies in the sector have used is partnering with independent worker voice organisations to improve visibility into recruitment and working conditions. For example, the Issara Institute has worked with companies in the seafood sector to establish independent worker voice channels, allowing migrant workers and job seekers to report recruitment and labour issues confidentially. Through initiatives like the Issara Partner Supplier Dashboard, companies gain direct access to worker-reported data on recruitment and working conditions in their supply chains.
- **Embedding responsible recruitment into procurement decisions:** One key approach involves integrating responsible recruitment criteria into tender evaluations and assigning weight to suppliers' policies and initiatives in this area. In high-risk sectors such as seafood, companies have incorporated specific responsible recruitment

requirements into their supplier selection processes. By prioritising suppliers with demonstrable commitments and engaging in discussions with suppliers' commercial teams to address associated risks, companies ensure that responsible recruitment remains a critical factor in procurement decisions.

- **Conducting risk scoping identify and respond to risks:** One buyer (Company 1) buyer implements an Online Recruitment of Agency Workers Questionnaire to gather additional information on the due diligence processes carried out by both suppliers and recruitment agencies when hiring workers. This initiative has enhanced the buyer's ability to oversee and monitor potential risks related to recruitment, enabling them to identify ways to better support suppliers in this regard moving forward.
- **Building the capacity of suppliers on the topic of responsible recruitment:** A best practice observed in our work is the development of comprehensive guidance that breaks down responsible recruitment into clear, actionable steps. This approach equips suppliers with essential knowledge, practical tools, case studies, and resources to help them strengthen their recruitment systems. A roadmap approach can be particularly effective in these programmes, given that suppliers have varying levels of expertise and capacity.

Suppliers' perspective

Suppliers also shared a number of best practices to overcome barriers to implementation, e.g.:

- **Recruitment agency selection:** Processing site 3 and processing site 4 stated that they would only work with a maximum of one recruitment agency per source country. The companies stated that this has increased their visibility over the recruitment process in these countries.
- **Operationalising recruitment policies:** Processing site 5 in Mauritius has a very comprehensive Ethical & Migrant Worker Policy which is 10 pages long that helps them to embed responsible recruitment in their management systems by outlining the vulnerabilities faced by migrants workers, stipulating the responsibilities for sub-suppliers to report on risks and conduct due diligence on its agencies, and suggesting checks(e.g., during agency selection worker onboarding, agency monitoring, etc.) for sub-suppliers who use migrant or contract workers.
- **Use of service agreements:** Processing sites 2 and 4 demonstrated good management systems for monitoring the payment of recruitment fees by migrant workers: Both companies have service agreements in place with their agencies, which clearly break down the cost of recruitment borne by migrant workers at various stages of the recruitment process, and which fees are to be borne by the agency, and which are to be covered by the buyer. The contracts stipulate that the agencies are to refund workers for any fees charged by the agency of scope of service agreement.
- **Mapping the true cost of recruitment:** The Thai Tuna Industry Association (TTIA) and Verité are about to conduct a pilot to map out the cost of recruitment fees for workers migrating from source countries in Southeast Asia (e.g., Myanmar) to go work in tuna processing sites in Thailand. The objective of the pilot is to increase

transparency on recruitment costs in these migration corridors, and on this based, come up with a model of how these costs can be shared between supply chain actors (recruitment agencies, tuna suppliers, international buyers).

Industry associations' perspective

The study found that industry associations and pre-competitive alliances (whether they represent the interests of tuna buyers or the food retail sector, more generally), can play an important role in promoting responsible recruitment. These organisations have different remits and can be grouped under the following categories (for more information on which associations in scope of this study belong to which category, please see the full report):

- **Standard-setters:** These associations play a pivotal role in establishing and communicating strict expectations regarding responsible recruitment and the Employer Pays Principle (EPP) to their members. They often set industry standards and criteria, ensuring that members comply with these guidelines to promote responsible recruitment practices.
- **Knowledge Sharers:** These associations focus on disseminating knowledge and resources related to responsible recruitment and EPP implementation without enforcing rigid compliance measures. They are not standard setters, but provide platforms for sharing best practices, tools, and information to empower their members to adopt responsible recruitment practices voluntarily.
- **Conveners:** Conveners serve as forums for industry stakeholders to engage in discussions, share experiences, and address issues related to recruitment practices and EPP. While they may lack strict expectations or expertise on the topic, they facilitate dialogue among members and promote collective engagement in addressing ethical challenges.
- **Others:** Industry bodies can also encourage members to adopt commitments related to ethical standards by providing them with a voluntary set of standards and tools to measure their own progress.

How can they help?

Industry bodies can help promote responsible recruitment in a number of different ways:

- **Outline strong expectations** for their members to adopt specific measures related to human rights. For example, SEA Alliance requires that members to implement a human rights due diligence approach, in line with the UN Guiding Principles, as appropriate for their operations and supply chains.
- **Build the capacity of members** on specific topics related to EPP and responsible recruitment. To give an example, SEA Alliance has developed trainings and tools on human rights and labour standards in seafood supply chains, covering topics such as Decent Work at Sea, Responsible Recruitment, Grievance Mechanisms, Information Gathering and Risk Assessment, and Purchasing Practices.

- **Provide members with tools to measure progress.** For example, the Global Tuna Alliance (GTA) has created KPIs to enabling members to track progress against human rights risks at processor and vessel level. Additionally, FNET benchmarks the progress of its members in the of their EPP commitments to assess their status.
- **Share information to identify shared risk:** Buyers can share information on their tuna supply chain (e.g., on key suppliers used in different markets, the source countries of migrant workers employed by key suppliers, the recruitment agencies used by these suppliers, the breakdown of recruitment costs in relevant migration corridors, and key recruitment-related risks identified) to identify and address shared risks within their supply chains.
- **Fund or provide financial support to responsible recruitment projects,** e.g., specific projects and initiatives on remediation, capacity building, or improving recruitment processes.
- **Convene stakeholders within the industry** to discuss shared challenges and opportunities. For example, SeaBOS has extensive science and academic capacity and expertise on best practices and global regulatory frameworks and has leveraged these to convene stakeholders around the topic of “Reducing IUU fishing and eliminating modern slavery” (one of SeaBOS’ task forces and two of SeaBOS’ commitments to deliver outcomes on).

6. Thinking Ahead: Road to implementation

Several recommendations and actions have been set out in this report for each stakeholder group (see definition).⁶ These have been summarised below but are outlined in more detail in the recommendations section of the complete report.

Industry associations

1. Continue to work together to commission and fund projects and joint initiatives on the topic of responsible recruitment (including through joint initiatives with other associations, where appropriate). This may include
 - Enabling joint investigations or HRDD initiative to identify and address shared risks.
 - Advocating for the strengthening of laws on responsible recruitment in source

⁶ Definitions:

- **Industry Association:** Any UK-based association or platform through which retailers, buyers and importers share information and best practices and work to address common issues. These associations may or may not be seafood focused.
- **Buyer:** Any entity that purchases seafood from a third party in one of the five source countries. This includes supermarket retailers as well as importers like World Wide Foods, which are considered buyers for the purposes of this study, as they buy tuna from third parties.
- **Supplier:** Companies that process tuna in the source countries and sell it to importers or buyers.

and destination countries.

- Supporting members by equipping them with knowledge and tools to tackle common barriers and risks.
- Hosting a working group dedicated to implementing a cost-sharing pilot, defining 'remedy', etc.). for the tuna industry
- Commissioning research and a global map on high-risk labour migration corridors on fair recruitment.

2. All associations should review their governance structure to ensure that their association is action-oriented when it comes to EPP and includes measurable targets or KPIs.

Buyers

1. Collaborate with other buyers to launch a pilot initiative that explores how the costs of responsible recruitment can be equitably shared across the supply chain, from suppliers to end consumers. For example, retailers could increase the retail price of tuna by a few cents, using the additional revenue to pay a higher price to suppliers, who would then allocate these funds towards implementing responsible recruitment practices.
2. Share non-commercially sensitive information with other buyers to identify shared risk where their supply chains overlap and potential areas for collective action; this might include data on perceived recruitment risk, and the true cost of recruitment in common migration corridors.
3. Work with procurement to integrate ethical considerations into supplier selection criteria.
4. Incentivise EPP-conformant suppliers, e.g., through longer-terms contracts, increased orders, or financial contributions.
5. Ensure that policies prohibiting bribery and corruption within the company's supply chain are integrated into responsible recruitment policies and commitments.
6. Collaborate with source and destination countries to advocate for the strengthening laws on responsible recruitment and agency regulation.
7. Work together to establish clear criteria on what constitutes "effective" remedy.

Suppliers

1. Work with buyers to calculate the true cost of recruitment.
2. Reduce the number of actors in the labour supply chain.
3. Choose agencies who are committed to deliver zero fee recruitment.
4. The contract between agency and employer should require zero fee recruitment.
5. Monitor responsible recruitment in person in source countries and via an effective grievance channel at all stages of recruitment and in employment.
6. Enforce consequences for breaches and ensure that contractual mechanisms are in place with agencies to ringfence funds for remediation.
7. Set up regular lessons learned sessions (at least annually) between the supplier and agency to build knowledge of problems and challenges and collaborate on solutions.

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