

Seafish Briefing Note

Overview of the Outlaw Ocean Investigation into the Chinese seafood sector

Key messages:

- The recent Outlaw Ocean investigation alleges:
 - suspected forced labour, human rights abuses, and other illegal fishing activity in the Chinese distant water fleet, predominantly focused on squid. The size of the fleet means that these abuses are occurring not just on the high seas but in other countries' waters.
 - suspected forced labour abuses of the Uyghur people across 10 processing plants in the Shandong region of China, and that 'thousands of tonnes of seafood' imported from factories using forced labour continue to enter the US, EU, and the UK.¹ The investigation also highlights the illegal use of North Korean labour in the border province of Liaoning, despite a UN prohibition.
- Focus is on seafood but there are wider concerns that China is expanding its reach into the marine, which presents risks for global food security, the marine environment, and the stability of international law.
- Outlaw Ocean suggest that the Chinese government is aware of and is orchestrating these labour abuses, through its labour transfer programmes and poverty alleviation measures.
- Traditional traceability and ethical audit programmes are ineffective in providing supply chain assurance, and that companies should not solely rely on third party audits.
- This is a global issue with over 300 companies and organisations from across the US/EU/UK implicated. As part of the investigation the allegations were shared with the named organisations/businesses and the responses received are published online.
- UK supply chain is implicated in the findings with approx. 30 UK organisations and companies referenced in the investigation.
- Outlaw Ocean is advocating primarily for regulatory change, with the initial focus on strengthening the implementation of the US '*Uyghur Forced Labor Prevention Act.*' Campaigning for UK and EU legislative change is also likely, and the allegations have already been raised with the European Parliament.
- Some US companies have already declared that they will cease purchasing from the Chinese processing plants referenced in the investigation (Lund Fisheries/Albertsons retail).
- According to FAO global fishery production data, China is responsible for 31% of global squid and cephalopod landings in 2021, landing 1.07 million tonnes.
- Seafish trade data highlights that the UK is heavily reliant on Chinese seafood.
 - China accounts for 12.8% of all seafood imported to the UK.
 - In 2022, the UK imported 153,277 live weight tonnes of fish and shellfish from China worth over £238m. This was an increase of 7% compared to 2021, although trade volumes are still below pre-Covid levels.
 - In 2022 half of all squid imports were consigned from China; some of this product will have been caught by the Chinese distant water fleet referenced in the investigation.

¹ The Uyghurs are an ethnic minority from the Xinjiang region in the north west of China. The United Nations, human rights organisations and academic experts agree that since 2018, the Chinese government has systematically subjected Xinjiang's predominantly Muslim ethnic minorities to forced labour across the country via state-sanctioned employment programs. These programs are understood to use coercive methods to enrol workers in processing plants and to obstruct their freedom to terminate their employment.

Purpose:

1. This Briefing Note provides:
 - a. An overview of the Outlaw Ocean Investigation and a summary of key findings.
 - b. A summary of the reaction to the allegations, and a preliminary assessment of their implications. Note these sections will be updated as more information is available.
2. The Briefing Note contains the following sections:
 - a. Section 1: How to navigate the extensive information on the Outlaw Ocean website - [A Fleet Prone to Captive Labor and Plunder | The Outlaw Ocean Project](#)
 - b. Section 2: Key findings from the two investigation reports.
 - [Part 1: Crimes at Sea – A fleet prone to captive labour and plunder](#)
 - [Part 2: Crimes on land – The Uyghurs Forced to Process the World’s Fish](#)
 - c. Section 3: Implications for UK seafood companies.
 - d. Section 4: Reaction to the investigation.
 - e. Section 5: Initial assessment of findings.
 - f. Section 6: Overview of the methodology used by Outlaw Ocean.
 - g. Section 7: How the investigation was funded.
3. In preparing this Briefing Note Seafish has not made any determination on the validity of the allegations contained in the Outlaw Ocean investigation. This version of the Briefing Note is reflective of the status of the issue as of the date of publication (18 October 2023). Further revisions will be provided.

Introduction:

4. In early October 2023 Outlaw Ocean² released the findings of its four year investigation into forced labour abuses in the Chinese seafood sector. The investigation centres on two articles, published initially in the New Yorker (*The Crimes Behind the Seafood You Eat on 9 October 2023*) and then, in considerable detail, on the Outlaw Ocean website. The investigation focuses on:
 - a. labour abuses and illegal activity onboard the Chinese distant water fleet, and in shore-based processing plants, which are linked to forced labour of the Uyghurs (one of China’s ethnic/religious minorities); and
 - b. how seafood produced by these Chinese businesses is part of the US, EU, Asia-Pacific, and UK supply chain.
5. The investigation represents four years of work by a team of investigators, headed up by Ian Urbina, a former journalist who created the journalism non-profit Outlaw Ocean Project.

²Outlaw Ocean is a non-profit journalism organisation that produces marine based investigative stories about human rights and environmental concerns.

Section 1: Navigating the information presented on the Outlaw Ocean website.

6. The website material centres on two investigative articles:
 - a. [Crimes at Sea: A Fleet Prone to Captive Labor and Plunder](#) focusing on the IUU (Illegal, Unreported and Unregulated) fishing conducted by the Chinese distant water fleet and the human rights abuses of foreign and Chinese crew.
 - b. [Crimes on Land: The Uyghurs Forced to Process the Worlds Fish](#) focusing on 10 Chinese processing plants and highlights their link to IUU fishing (mostly squid) and to forced labour of Uyghur and ethnic minority citizens.
7. The Ocean Outlaw website also includes numerous associated documents and interaction tools, as follows:
 - a. [Bait-to-Plate](#) An interactive tool that details the Chinese seafood supply chain - from fishing vessel to Chinese processor to western importer and buyer. The tool provides information on 357 vessels operating in the Chinese distant water fleet, detailing the human rights, labour and environmental abuses associated with each individual vessel. These vessels are then linked to Chinese processing businesses and overseas importers and retail buyers (by country). Businesses from the US/EU/UK are listed.
 - b. [Discussion](#) An interactive tool that presents transcripts of email exchanges between Outlaw Ocean and various named businesses/organisations (fishing businesses, processing companies, retailers, auditors, NGOs, and government agencies). It is possible to search by business name and country.
 - c. [Ubiquity](#) An interactive tool that presents the extent of the global supply of Chinese seafood linked to labour abuses, human rights concerns, and other illegal activity. The tool maps the linkages between processors, importers, and buyers, and details the alleged abuses by processing companies.
 - d. [Videos](#) This section features videos that accompany the investigation.
 - i. *Stories*: Consists of seven videos including how the investigation was conducted, the treatment of Uyghurs in Chinese seafood processing, the rise of China as a seafood superpower, and a case study of the conditions onboard a squid jigger. Videos range from 6 to 20 minutes in duration.
 - ii. *Moments*: Shorter videos produced by investigators in the field presenting different aspects of the investigation, from how they contacted vessel crew, to observing workers onboard. There are 18 short videos.
 - iii. *Documentary*: A video of a fictional narrators view of working onboard a Chinese squid vessel. This was included as part of the report in the New Yorker.
 - e. [Findings](#) provides a summary of the main conclusions reached from the investigation.
 - f. [Methodology](#) details the methods and reporting tactics used in various aspects of the story. Further information is provided in Section 6.
 - g. [Solutions](#) sets out expert led recommendations on how the oversight of the seafood supply chain could be improved. There is a strong focus on US legislative measures.

Section 2: Key findings from the two investigation reports

Part 1: Crimes at Sea – a fleet prone to captive labour and plunder

8. **Summary:** Part 1 of the investigation focuses on the activities of the Chinese distant water fleet. It highlights the poor treatment of foreign and Chinese crew (heavy reliance on Indonesian workers) on Chinese vessels (trafficking, debt bondage, violence, neglect, and death) and the exploitative practices of recruitment agencies (including debt bondage). China claims to have 2,700 distant water fishing vessels, although Outlaw Ocean considers this is an underestimate (their claim is over 6000 vessels, making the Chinese fleet twice the size of its global competitors). The fleet lands five billion pounds of seafood a year (20% of this is squid). Allegations include that (1) the Chinese distant water fleet engages in IUU fishing and in military activities, and that these activities are endorsed or encouraged by the Chinese government, (2) half of the Chinese squid fleet (357 vessels) are associated with human rights abuses and illegal activity.
9. **Treatment of foreign crew:** The treatment of several crew is referenced but the article focuses on the story of Daniel Aritonang, an Indonesian fisherman who worked as a deckhand on the Zhen Fa 7 from September 2019 until his death in 2021. The investigation details his experiences onboard the squid vessel; allegations highlight that it was characterised by poor working conditions, months at sea, abuse and physical beatings, and being unable to leave the vessel or to communicate with his family. He died in a hospital in Montevideo, Uruguay in March 2021. Ocean Outlaw allege that his death was caused by untreated beriberi³ and injuries he sustained while working at sea.
10. **The Chinese distant water fleet:** Ocean Outlaw assert that the Chinese fleet engages in the following illegal activity:
 - a. Vessels turning off transponders when close to territorial waters.
 - b. Overfishing of squid stocks.
 - c. Illegal catching of sharks for their fins.
 - d. Fishing in North Korean waters (in contravention of UN sanctions).
 - e. Falsifying catch records and mislabelling.
11. **Chinese government:** There are allegations that the Chinese government is complicit in this activity.
 - a. Supported the distant water fleet with US\$7bn in subsidies and logistical, security, and intelligence support.
 - b. Provided US\$17m in subsidies to 50 vessels that had engaged in illegal activities or had deaths/injuries onboard.
 - c. Chinese firms operate in and invest in 95 foreign ports (e.g. Hamburg, Germany and Chancay, Peru) as part of its Belt and Road Initiative.⁴ This investment is often used to exert influence on local governments.⁵
 - d. Accused of paying fishing vessels to remain in contested areas (i.e. Taiwanese waters) and to engage in escort and obstruction activities. Also alleges that vessels are used for tracking and surveillance of other ships and goods in surrounding areas.

³ Beriberi is a disease caused by vitamin B1 (thiamine) deficiency. It is lethal if untreated, but easily treated with supplements. It is described as a disease of captivity.

⁴ [Belt and Road Initiative: Is China's trillion-dollar gamble worth it? - BBC News](#)

⁵ Kardon, I.B., and Leutert, W. – Pier Competitor (2022). Available at https://doi.org/10.1162/iec_a_00433

12. **Summary:** Part 2 focuses on the activities of 10 Chinese processing plants in the Shandong Province. Outlaw Ocean allege that forced labour, predominantly of the Uyghur people and other ethnic minorities, is used in processing plants and that the seafood produced is endemic in western seafood supply chains. The report highlights that these abuses are not detected by the social audits that western businesses rely on. While not stated in the article, but noted in the methodology, the ‘employment’ of Uyghur workers from Xinjiang is not illegal in China and is facilitated/encouraged via China’s labour transfer and poverty alleviation measures. However, the use of forced labour through these Chinese government schemes is considered illegal under US law (Uyghur Forced Labor Prevention Act).
13. **Forced Labour:** The investigation details that Chinese labour transfer programmes, such as Xinjiang Aid, have seen Uyghurs and other ethnic minorities moved from Xinjiang to Shandong (seafood processing hub). These labour programmes are branded as poverty alleviation initiatives but are often coercive and are used to meet labour shortages in major processing hubs. The investigation alleges that the 10 seafood processing companies have used more than 1000 Uyghur workers since 2018, and that over the same period 47,000 tonnes of seafood has been shipped to the US from these factories.
14. **Seafood processing:** Ocean Outlaw acknowledge that it is notoriously difficult to penetrate supply chains and access to information is limited in China. Further seafood commingling during shipping and processing can make transparency and tracking difficult. However, the article highlights that (1) the US government is understood to have procured more than US\$200m on seafood from importers linked to forced labour and (2) seafood businesses in 20 countries are associated with these 10 Chinese processing plants. Tesco and Nomad are explicitly named in the article.
15. **Social audits:** The report is critical of the efficacy of social audits in providing assurance that product in supply chains is not associated with forced/exploited labour, or illegal activity. Outlaw Ocean claim that half the Chinese exporters that were associated with Uyghur labour had passed social audits by leading global inspection firms. For example, Haibo Seafood (integrated fishing and processing company⁶) passed a social audit in May 2022, but social media activity (on Douyin⁷) indicates that in 2022 there were up to 170 Uyghurs working in the processing plant. The allegation is that that these audits are falsified. Sedex⁸, whose SMETA assessment tool is used for many of the social audits, has since acknowledged that it is difficult and at times risky for its auditors to identify state endorsed forced labour. The processing plants under investigation are also Marine Stewardship Council (MSC) certified.

⁶ <http://www.haiboseafood.com/index.php>

⁷ Douyin is the Chinese equivalent of Tiktok.

⁸ <https://www.sedex.com/>

Section 3: Implications for UK businesses and organisation

16. While the focus of the investigation to date has been on the US seafood sector, some UK businesses are referenced in the investigative reports. The interactive tools detail the full extent of how UK wholesalers, processors and retailers are impacted. There are approximately 30 UK companies/organisations referenced, including government departments (Defra and the Department of Business and Trade (DBT)) (see Annex 2 for a full list). UK named entities account for approximately 10% of the businesses listed. The implication is that UK businesses are sourcing seafood from Chinese businesses engaged in labour abuses and criminal activity.
17. The Ubiquity Tool lists 81 seafood buyers alleged to be directly associated with human rights abuses and environmental concerns. Four are British companies; Lyons Seafoods, Nomad Group and Youngs (processing), and one retailer, Sainsbury's. Sysco, a food service company operating in the UK is listed but the allegations relate to US imports.
18. The Discussion Tool details the email exchanges between UK companies and organisations and Outlaw Ocean.⁹ Twelve UK businesses responded to the initial Ocean Outlaw email. Key themes in the responses provided are summarised below:
 - a. All companies contacted were clear on the seriousness of the allegations and that forced labour/human rights abuses have no place in their supply chains.
 - b. Retailers advised that own brand products are not linked to the companies under investigation, but that private label brands would need to be contacted directly.
 - c. Some companies advised that there have been no recent purchases from the Chinese processing company referenced in the email, and that they would also remove the company from their supplier list.
 - d. Confirmation that their suppliers have met the requirements of an ethical audit or that they take a business specific approach to managing their suppliers.
 - e. Advised that they will fully investigate the claims or have requested further evidence/information before responding.
19. Other responses from the UK include:
 - a. Sedex advise that it is not an enforcement agency and forced labour, as a criminal activity, can be difficult to detect and identify. It is conducting an internal review of audits, which was still ongoing at the time of publication.
 - b. The MSC advised that they certify on two criteria: fisheries standards and chain of custody, but due to the commercial nature of these audits they cannot be shared.
 - c. British Retail Consortium advised that they encourage retailers to use third parties to research and audit their supply chains.
 - d. The Department of Education advised that it was not possible to determine if seafood from the processing plants under investigation is used in UK schools, and directed Outlaw Ocean to the DBT; the Foreign, Commonwealth and Development Office; and DEFRA.

⁹ The methodology section does indicate that inclusion in the Discussion Tool does not mean that a company has engaged in any illegal activity.

Section 4: Reaction to the investigation

20. Media activity during week 1 (9-17 October) has been primarily US based. There has been some UK coverage in specialist seafood media, and in mainstream EU press. Outlaw Ocean has intimated that it is still investigating aspects of the story and it is possible that there will be further details referencing UK businesses which could prompt further media coverage.

21. Key media articles are as follows:

- a. New Yorker: [The Uyghurs Forced to Process the World's Fish | The New Yorker](#)
- b. Le Monde: [Avec les marins forcés de l'empire chinois de la pêche : « Mes parents doivent récupérer mon corps » \(lemonde.fr\)](#)
- c. Semafor: [U.S. scrutiny of Chinese fishing grows | Semafor](#) (includes responses from US politicians, the Chinese embassy in the US).
- d. Undercurrent News:
 - i. [Report: Chinese plants using forced Uyghur labor supplying major European, US retailers - Undercurrent News](#)
 - ii. [Outlaw ocean reveals 'crimes at sea' aboard Chinese fishing vessels](#)
- e. Guardian: Opinion piece [You may be eating fish caught and processed by Uyghur forced labor | Kenneth Roth | The Guardian](#)
- f. [HRAS opinion piece. MSC: Must change or step away from voluntary standards for human rights protections in seafood supply chains](#)
- g. Intrafish:
 - i. [US lawmakers schedule hearing into Outlaw Ocean Project investigation into use of Chinese forced labor in seafood supply chain.](#)
 - ii. <https://www.intrafish.com/fisheries/several-suppliers-mentioned-in-outlaw-ocean-investigation-have-audited-their-supply-chains-and-found-no-wrongdoing/2-1-1535875>
- h. Seafood Source:
 - i. [Bombshell Outlaw Ocean report finds evidence of seafood processed by forced labor in US supply chain | SeafoodSource](#)
 - ii. [Albertsons drops High Liner products after supplier is implicated in forced labor exposé | SeafoodSource](#)
 - iii. [Lund fisheries, PAFCO cease business with Chinese processors named in Outlaw Ocean report.](#)
 - iv. [Seafood industry cuts ties to Chinese firms accused of using Uyghur labor](#)
 - v. [Social audits for MSC, ASC, BRC certification likely missed evidence of Uyghur forced labor](#)

Section 5: Initial assessment of findings

22. The allegations made in the Outlaw Ocean investigation are not new. There has been extensive media coverage, research, and analysis on issues with Chinese supply chains, and the treatment of Uyghur workers in other sectors (cotton, tomatoes). There have been both regulatory and policy responses, extensive research, and the emergence of NGO groups focused on the matter.^{10 11 12}
23. There has been strong condemnation of the Outlaw Ocean allegations, including political condemnation in the US. The US Congressional Executive Committee on China is scheduling a hearing on 24 October to discuss the implications of the findings. The investigation has also been raised with the European Parliament in the context of ongoing negotiations on the Forced Labour Regulation.
24. From a UK perspective industry engagement on the processing allegations is being supported by the Seafood Ethics Action Alliance (SEAA). Given the complexity of the issue and commercial sensitivities, many businesses will be cautious in sharing how they intend to respond. UK businesses have advised that the focus is on completing due diligence to understand how businesses may be implicated, and what action should or can be taken. In the US the response has been stronger, and a major processor and retailer have already confirmed they will no longer source from Chinese processing plants under investigation.
25. The extent to which the UK supply chain is exposed to Chinese caught squid is still unclear. Trade data indicates that squid imports consigned from China have increased in recent years. What is unclear is if these imports are sourced from the Chinese distant water fleet or caught by other national fleets and shipped to China for processing. Despite IUU measures requiring catch certificates, it is not always possible to analyse returns to link imports to specific vessels. Seafish is investigating if the catch certificate data accompanying squid imports can be analysed.
26. The Sustainable Fisheries Partnership¹³ establishes supply chain round tables to 'serve as a forum for processors, importers, and others that buy directly from specific fishery sectors to work together in a pre-competitive environment to promote improvements throughout the supply chain'. The Global Squid Supply Chain Roundtable (SR) has been operating since March 2017 and has previously acknowledged the risks associated with the Chinese distant water fleet. The SR consists of major European and North American importers and buyers of squid sourced mainly from Asia-Pacific and South American squid fisheries. It is currently renewing its sourcing guidance in response to the Outlaw Ocean allegations. Further updates are expected later in October.
27. The UN Human Rights Commission has formally acknowledged that the Chinese government has systematically subjected Xinjiang's predominantly Muslim ethnic minorities to forced labour across the country, via state-sanctioned employment programs. These programs are understood to use coercive methods to enrol workers in processing plants and to obstruct

¹⁰ [The US Department of Labor has a page dedicated to "Forced Labour in Xinjiang" - Against Their Will: The Situation in Xinjiang](#) which includes details of Goods produced by Forced Labour. Fish was added to this list in relation to China in 2020, though focus is on fishing vessels rather than processing.

¹¹ [Call to Action - Coalition to End Forced Labour in the Uyghur Region](#)

¹² [China responsible for 'serious human rights violations' in Xinjiang province: UN human rights report](#)

¹³ A US based NGO <https://sustainablefish.org/how-we-work/supply-chain-roundtables/>

their freedom to terminate their employment. In its recently published document on options for business, it proposes that in situations with limited mitigation options, businesses should consider responsibly exiting the operating context.

28. Seafish is working with an external consultant to better understand the risks associated with Chinese sourcing. The project findings will be shared with SEAA members in the first instance.

Section 6: Overview of the methodology used by Outlaw Ocean

1. This section provides an overview of the methods that Outlaw Ocean used to gather the information that has formed the basis of its report. A summary is presented below and details on the specific investigate methods used can be found in Annex 1. Seafish has not verified the accuracy/validity of these methods.
2. The investigation highlights that various methods were deployed at different stages of the investigation and multiple sources were used to confirm the details reported on. Allegations are only reported on when they are associated with or subsequently verified by a credible source.
3. There is a reliance on freely available and open-source material. This includes keyword searches on search engines (both inside and outside China), social media and geolocal data for relevant posts, published government reports, company newsletters and documents, and publicly available data (for example, Aiqicha a corporate search tool which provides information on Chinese businesses).
4. Specialist information was provided by the following databases and organisations:
 - a. Marine Traffic and Global Fishing Watch, vessel tracking systems to verify vessel activity,^{14 15}
 - b. Krakken the global fishing vessel database,
 - c. Equasis for details of vessel ownership/management and inspection history;¹⁶ and
 - d. Skylight for information on suspicious vessel behaviour.¹⁷
5. Further evidence and intelligence were gathered from direct contact with Chinese and foreign crew, by recording eyewitness narratives, and through interviewing organisations linked to the seafood industry.

Section 7: How the investigation was funded

6. The investigation is understood to have been funded/supported in part by grants from:
 - a. The Pulitzer Centre <https://pulitzercenter.org/> - to mobilise action through investigative journalism and powerful stories.
 - b. The Judith Neilson Institute - championing quality storytelling and journalism in Australia <https://judithneilsonprojects.com.au/project/jinstitute>
 - c. The Fund for Investigative Journalism - <https://fij.org/about-fij/> Provides grants and support to independent journalists and news organizations to produce high-quality, unbiased, nonpartisan investigative stories that have an impact.
 - d. Humanity United - <https://humanityunited.org/#allow>
7. The total cost of the investigation is unknown, as is the contribution the above organisations have made to Outlaw Ocean.

¹⁴ <https://www.marinetraffic.com/>

¹⁵ <https://globalfishingwatch.org/>

¹⁶ <https://www.equasis.org/EquasisWeb/public/HomePage>

¹⁷ <https://www.skylight.global/>

Annex 1: Specific data gathering, and analysis methods used by Outlaw Ocean

- To investigate practices onboard Chinese fishing vessels the investigation team would approach vessels and seek permission (via radio) to board, often offering gifts of fruit, cigarettes, sweets as an incentive. If they were not permitted to board a vessel, they would throw plastic bottles onboard containing a questionnaire and a pen for crew to complete and then throw back overboard.
- The Daniel Arintonang story used eyewitness testimony, photographs, autopsy reports, satellite tracking of the vessel and information from social media.
- To establish links between fishing vessels and Chinese processing plants, Outlaw Ocean identified transshipments using data from Global Fishing Watch, Krakken and C4ADS¹⁸ to compile a list of Chinese-owned reefers. They then used Skylight to log when a reefer was adjacent to a squid vessel (2 vessels within 250m travelling at same speed). Transfers from reefer vessels to processing plants was confirmed by shore based observations of a vessel's cargo being unloaded, by following trucks to factories, and by capturing images of processors using containers/bags with relevant vessel markings. Corporate network analysis was used to connect fishing vessels to exporters by mapping company structures and ownership to identify beneficial owners.
- On export volumes, Outlaw Ocean used public trade data for each Chinese seafood processing plant under investigation and calculated total tonnage as total gross weight reported in each shipment.
- To assess the number of Uyghurs working in seafood processing plants, Outlaw Ocean sourced user-generated social content posted in the last 12 months that indicated that Xinjiang minorities were working in seafood processing plants. Locations were then verified through mobile phone footage published on Douyin, combined with open-source imagery (company materials, photos in local news, satellite imagery and Baidu Street view). Further analysis used geospatial analysis, comparative analysis, text translation, and user comments. Ocean Outlaw also estimated the minimum number of people transferred from Xinjiang based on state media reports and company material. Where no 'official' figures were available, Outlaw Ocean relied on social media posts that connected users to the seafood processing plant in question.
- To assess which companies in the US, EU and UK were importing implicated seafood, Outlaw Ocean relied on trade data from Chinese customs, private trade analysis, company websites for information on who they supply, and footage from 'Douyin' showing seafood packaging (and brand labels). Outlaw Ocean also used OpenCorporates¹⁹ (provider of legal entity data) to identify ownership structures of US and EU companies. Using the unique importer codes Ocean Outlaw also conducted optical character recognition searches for those codes on product packaging and reviewed product listings on retailer and foodservice distribution websites to identify seafood products produced or sold by importers.
- To identify the presence of Chinese seafood in public procurement, Outlaw Ocean used Government-contract databases (European Union tender database, USASpending.gov) and trade data to identify companies that received procurement contracts. In the UK, framework agreements were used to identify government approved suppliers and then MSC codes were used to link the product back to the Chinese processing plants at the heart of the investigation.

¹⁸ <https://c4ads.org/>

¹⁹ <https://opencorporates.com/>

Annex 2: UK Companies/Organisations referenced in the investigation.

Category	Name
Importers	Fastnet Fish
	Oceanic Seafoods Ltd
	NSF Foods Ltd
	Northcoast Seafoods
	Sea Products International Ltd
	Westbridge Food Group
	Unibond Seafood International Ltd
Processing	Lyons Seafood
	Nomad Foods
	Youngs's Seafood
Retailers & Food Service	Aldi
	Asda
	Bidfresh
	Co-op
	Marks and Spencer (M&S)
	Morrisons
	Ocado
	Sainsbury's
	Tesco
	Waitrose/John Lewis
	HiYou
Other Organisations	British Retail Consortium (BRC)
	Department of Education
	Intertek Group PLC
	Lloyd's Register Quality Assurance (LRQA)
	Marine Stewardship Council
	Supplier Ethical Data Exchange (Sedex)
	Department for Business & Trade
	Department for Environment, Food and Rural Affairs
	Foreign, Commonwealth and Development Office