

U.S. Department of Labor

Bureau of International Labor Affairs
Washington, D.C. 20210



January 25, 2021

John Williams
Southern Shrimp Alliance
955 E. MLK Dr., Suite D
Tarpon Springs, FL 34689

Dear Mr. Williams:

Thank you for the information you provided about forced labor in the production of seafood. We appreciate your comments on this important issue and your interest in the Department of Labor's (DOL) reports.

We carefully reviewed your letter and accompanying materials and consider them a submission under the Procedural Guidelines for the development and maintenance of DOL's *List of Goods Produced by Child Labor or Forced Labor*, also known as the Trafficking Victims Protection Reauthorization Act (TVPRA) List. The Procedural Guidelines can be found here:

<https://www.federalregister.gov/documents/2007/12/27/E7-25036/notice-of-procedural-guidelines-for-the-development-and-maintenance-of-the-list-of-goods-from>. Based on these Guidelines, DOL's Office of Child Labor, Forced Labor, and Human Trafficking (OCFT) accepts public submissions on an ongoing basis regarding the addition of goods to, or removal of goods from, the List. OCFT reviews each submission to determine whether it provides relevant and probative information. Per our standard procedures, submissions are also published on the DOL website. Whenever OCFT makes a determination about an addition to or removal from the List, OCFT publishes a notice in the *Federal Register* and posts the updated List on the DOL website. The most recent List was released September 30, 2020 and can be found at: <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods>.

Section 105(b)(2)(C) of the Trafficking Victims Protection Reauthorization Act of 2005 ("TVPRA of 2005"), 22 U.S.C. 7112(b)(2)(C), directed ILAB to "develop and make available to the public a list of goods from countries that the Bureau of International Labor Affairs has reason to believe are produced by forced labor or child labor in violation of international standards." OCFT must have sufficient evidence to attribute the use of child labor or forced labor in the production of a good to a specific country. It is important to note that OCFT, contrary to the assertion in your submission dated January 13, 2020, did not have a position to exclude seafood harvested in international waters and the high seas or by foreign-flagged vessels in other countries' EEZs.

When reviewing the available evidence on forced labor in distant water fishing fleets, OCFT took into account the information provided in this submission. OCFT has reviewed the available evidence, determined that it meets the criteria in our procedural guidelines, and has included fish produced by Taiwan and China on the 2020 List. Both distant water fishing fleets are known to harvest fish on the high seas and in other countries' EEZs.

OCFT will continue to closely monitor labor conditions in the sector. We welcome further engagement with all stakeholders on this important issue, and any additional information on forced labor in high seas catch.

OCFT recognizes the important role that companies and businesses can play in the reduction of child labor and forced labor. OCFT's *Comply Chain: Business Tools for Compliance in Global Supply Chains* contains best practices guidance for companies on developing social compliance systems to reduce child labor and forced labor in their supply chains. This free resource is available as a mobile app and can be downloaded from the [iTunes and Google Play stores](#). You can also access it on our website at: <https://www.dol.gov/ilab/complychain/>.

Again, thank you for contacting us about these important issues. We look forward to continuing to engage with you as we pursue our common goal of combating forced labor on the high seas and international waters.

Sincerely,



Marcia Eugenio
Director
Office of Child Labor, Forced Labor, and Human Trafficking