Statement of Support from:

- **Alaska Longline Fishermen's Association;**
- **Catfish Farmers of America;**
- **Hawaii Longline Association;**
- **Fishing Communities Coalition;**
- **Maine Coast Fishermen's Association;**
- **Midwater Trawlers Cooperative;**
- **New England Young Fishermen's Alliance;**
- **North Carolina Fisheries Association;**
- **Southeastern Fisheries Association; and**
- **Southern Shrimp Alliance**

November 12, 2026

Chairman Brett W. Doyle
U.S. International Trade Commission
Office of International Trade Commission
500 E Street SW
Washington, D.C. 20436

Re: Letter in Support of Section 337 Complaint – Docket No. 3945

Dear Chairman Doyle,

We, the undersigned, are organizations representing the interests of U.S. seafood producers, as well as American commercial fishermen and members of the American seafood industry. As active participants in the U.S. seafood market, we believe it is both possible and necessary to source seafood produced without forced labor.

We have an interest in this matter because as seafood producers in the United States, we are at a competitive disadvantage with respect to competing for sales in the U.S. and global market against supply chains corrupted by forced labor practices. An overwhelming majority – with the FDA estimating a market share of 94 percent – of the seafood sold in the U.S. market is sourced from foreign industries. Concerns with the proliferation of forced labor practices within foreign seafood supply chains are widespread as numerous seafood products (fish, dried fish, Nile perch, shellfish, shrimp) from a wide variety of countries are currently identified by the U.S. Department of Labor as goods produced through forced and/or child labor.

The higher production costs associated with compliance with U.S. regulations and international human rights norms require domestic producers (and the ethical foreign industries participating in this market) to sell our seafood at higher prices. Our profitability is significantly impaired when pricing is suppressed by imports that are produced under noncompliant labor conditions.

Because the U.S. International Trade Commission ("ITC") can impose remedies under Section 337 that will help immensely in the effort to eradicate foreign labor abuses that are linked to unfair competition in the U.S. seafood market, and because the federal agency has the opportunity to do so as a result of the complaint filed by U.S. shrimpers against certain imports of Indian shrimp, we urge the ITC to institute an investigation into the allegations raised in that complaint.

We believe it is of vital importance that the ITC institute this investigation and conduct the first Section 337 investigation into allegations of human rights abuses in a U.S.-facing seafood supply chain. The ITC should not permit the U.S. market to be inundated with seafood imports sourced from farms, vessels, fisheries, processors, and other companies within the seafood supply chain that fail to observe basic, internationally recognized norms and rights, including the prohibition against forced labor. Among other things, such unfair competition is extremely harmful to the commercial interests of all U.S. seafood producers.

We respectfully request that the ITC institute the investigation into shrimp produced through forced labor.

Sincerely,

/s/ Linda Behnken **Alaska Longline Fishermens Association** Linda Behnken, Executive Director	*/s/ Heather Munro Mann* **Midwater Trawlers Cooperative** Heather Munro Mann, Executive Director
/s/ Chad Causey **Catfish Farmers of America** Chad Causey, Executive Vice President	*/s/ Andrea S. Tomlinson* **New England Young Fishermen's Alliance** Andrea S. Tomlinson, Executive Director
/s/ Dr. Eric Kingma **Hawaii Longline Association** Dr. Eric Kingma, Executive Director	*/s/ Glenn Skinner* **North Carolina Fisheries Association** Glenn Skinner, Executive Director
/s/ Noah Oppenheim **Fishing Communities Coalition** Noah Oppenheim, Coordinator	*/s/ Capt. Bob Zales, II* **Southeastern Fisheries Association** Capt. Bob Zales, II, Executive Director
/s/ Ben Martens **Maine Coast Fishermen's Association** Ben Martens, Executive Director	*/s/ Blake Price* **Southern Shrimp Alliance** Blake Price, Executive Director

Statement of Support from:

American Shrimp Processors Association

SCHAGRIN ASSOCIATES
900 SEVENTH STREET, N.W. - SUITE 500 - WASHINGTON, D.C. 20001
P: (202) 223-1700 E: EDRAKE@SCHAGRINASSOCIATES.COM

November 11, 2026

Docket No. 3945
PUBLIC DOCUMENT

FILED BY EDIS
Secretary Lisa R. Barton
U.S. International Trade Commission

Re: Public Interest Comments in the Section 337 Investigation of Certain Shrimp and Products Containing Same

Dear Secretary Barton:

On behalf of the American Shrimp Processors Association ("ASPA"), a trade association the majority of whose members produce frozen warmwater shrimp in the United States, we respond to the request of the International Trade Commission ("Commission") for comments on the complaint entitled *Certain Shrimp and Products Containing Same*.[1] ASPA urges the Commission to initiate this investigation, as banning imports made with forced labor is clearly in the public interest. These comments focus on issues (iii), (iv), and (v) in the Commission's request, addressing the domestic industry's capacity to replace the volume of Nekkanti's product and the impact on U.S. consumers.

ASPA has 24 member companies that process frozen warmwater shrimp in the United States. ASPA was formed in 1964 to promote the interests of the domestic, U.S. wild-caught, warmwater shrimp processing industry along the Gulf Coast. Its members span Texas, Louisiana, Mississippi, North Carolina, Alabama, and Florida. Many ASPA members are small, family-owned companies that have been processing domestic shrimp for generations. ASPA and its members stand ready and willing to draw on unused capacity and draw down inventories to fully replace any excluded imports.

Recent Commission investigations conducted under Sections 701 and 731 of the Act provide valuable data showing that the domestic industry produces articles directly competitive with Nekkanti's and has ample capacity to meet any consumer demand currently met by Nekkanti. As

[1] *See Notice of Receipt of Complaint; Solicitation of Comments Relating to the Public Interest*, 91 Fed. Reg. 211 (U.S. Int'l Trade Comm'n Nov. 3, 2026).

complainants note, Nekkanti's total annual shrimp production is estimated at 32,000 MT.[2] Available bill of lading data show that Nekkanti serves sizeable markets in not only the United States, but also a number of different European and Asian markets, as demonstrated in the following chart:

Nekkanti Global Exports: January 2024 – February 2026		
Africa	$	244,525.00
Asia Pacific	$	60,466,735.06
Eastern Europe and Middle East	$	2,155,351.71
Other North America	$	7,742,276.09
United States	$	233,937,881.34
Western Europe	$	5,855,067.55

Advertisements on Indian wholesaler websites show that Nekkanti also serves the domestic Indian market.[3] Thus, the requested relief would impact well below 32,000 MT of imports per year.

The U.S. shrimp industry possesses ample capacity to replace this supply. There is abundant supply of both fresh, wild-caught shrimp from the domestic shrimp fishery, and processed, frozen shrimp from domestic shrimp processors. Together, the industry could easily replace Nekkanti's volume, and it could do so in a very short period of time using existing equipment and personnel.

In its recent investigations on frozen warmwater shrimp from Ecuador, India, Indonesia, and Vietnam, the Commission found no support for claims of some undefined, hypothetical biological limit on the population of shrimp in U.S. waters constraining domestic supply.[4] The Commission also reported that most U.S. processors, importers, and purchasers had not experienced supply constraints during the period of investigation.[5] The National Oceanic and Atmospheric Administration

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[2] *See* Letter from Picard, Kentz & Rowe to Sec'y Barton re: Certain Shrimp and Products Containing Same (October 28, 2026) ("Complaint") at 9.

[3] *See, e.g.,* TradeIndia, Nekkanti Sea Foods Ltd. – Company Profile, available at https://www.tradeindia.com/nekkanti-sea-foods-ltd-28552380/ (advertising Nekkanti's products on an Indian B2B marketplace); *and see* Justdial, *Nekkanti Raw Breaded Tailon*, *JD Mart*, available at https://www.justdial.com/jdmart/Visakhapatnam/Nekkanti-Raw-Breaded-Tailon/, (advertising several Nekkanti products on a second Indian B2B marketplace).

[4] *Frozen Warmwater Shrimp from Ecuador, India, Indonesia, and Vietnam*, Inv. Nos. 701-TA-699-700 and 731-TA-1660 (Final), USITC Pub. 5566 (December 2024) ("Final Publication, Ecuador et al. Investigation"), at 78.

[5] *Id.* at II-9.

("NOAA") and Department of Commerce have both similarly found ample supply in the stock of U.S. shrimp to increase wild-caught landings.[6] A March 2026 report from NOAA demonstrates the ample capacity of the national shrimp fleet to increase its harvest should economics allow, because "{e}ach year a number of federally-permitted Gulf shrimp vessels stay tied up to the dock and do not shrimp" due to low-priced import competition.[7] News reports of fishing vessels being tied up due to this pricing pressure are abundant.[8] These fishermen would have every incentive to intensify fishing efforts and increase domestic landings if unfairly-produced imports from Nekkanti are excluded from the market.

In addition to ample available supply from U.S. shrimp fishermen, data from the Commission's recent investigations further establish that domestic shrimp processing capacity far exceeds Nekkanti's total annual production capacity. Specifically, the Commission found that domestic processors' capacity utilization rate fell from an already low 47.2 percent in 2021 to just 36.9 percent in 2023.[9] In 2023, the 20 responding domestic processors reported having processed 104

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[6] NOAA Fisheries, NOAA Fisheries Report Reveals Dire State of Gulf Shrimp Fishery, available at https://www.fisheries.noaa.gov/feature-story/noaa-fisheries-report-reveals-dire-state-gulf-shrimp-fishery, (noting that, "shrimp populations have remained stable and are not undergoing overfishing" despite declining landings); *see also* Letter from Dep't Commerce to Governor Edwards (November 2, 2023), available at https://www.fisheries.noaa.gov/s3/2023-11/DOC-Response-LA-Shrimp.pdf, (declaring that, "the resource {i.e. shrimp} exists and is accessible, and the decision not to fish (i.e., not to access the resource) is based on economic factors, rather than inaccessibility of the resource).

[7] Christopher Liese et al., Snapshot: Economics of the Gulf of America Federal Shrimp Fishery, NOAA Technical Memorandum NMFS-SEFSC-795 (Mar. 2026), available at https://www.fisheries.noaa.gov/s3/2026-03/Gulf-Shrimp-Economic-Snapshot-Report-Final-NMFS-SEFSC-795.pdf, at 8.

[8] *See, e.g.*, Gaige Davila, *Texas Shrimpers Look to Feds for Help as Imports Threaten the Gulf Shrimp Industry*, Texas Standard (Sept. 25, 2023), available at https://texasstandard.org/stories/texas-gulf-coast-shrimpers-shrimp-industry-imports-government/ (reporting that only 20 of Port Isabel's 41 boats participated in the July opener for the 2023 fishing season); *High Diesel Prices Squeeze Gulf Shrimpers, Marketplace* (Sept. 29, 2026), available at https://www.marketplace.org/story/2026/09/29/high-diesel-prices-squeeze-gulf-shrimpers (reporting that high diesel prices have forced Gulf shrimpers to stay docked); Paula Levihn-Coon, *Disaster Declared for Texas Shrimp*, Texas Observer (Nov. 15, 2023), available at https://www.texasobserver.org/texas-shrimp-disaster-imports/ (reporting tied up boats in Galveston, Texas); *"The Boats Are Just Sitting There": Area Shrimpers Struggling Amidst Imports*, Port Arthur News (July 16, 2024), available at https://panews.com/2024/07/16/the-boats-are-just-sitting-there-area-shrimpers-struggling-amidst-imports/ (reporting tied up boats in Port Arthur); Ana Campbell, *The Texas Shrimping Industry Is on Its Deathbed. Will a New Law Help?, Texas Public Radio* (Sept. 4, 2025), available at https://www.tpr.org/news/2025-09-04/texas-shrimp-new-law-south-padre-island (reporting that fewer than 100 of 450 boats in the Port of Brownsville left the port in 2025).

[9] Final Publication, Ecuador et al. Investigation at 73.

million pounds, or about 47,173 ("MT") of frozen warmwater shrimp, leaving 177 million pounds, or about 80,286 MT, of unused capacity.[10] These numbers were estimated to reflect only 80 percent of domestic production,[11] implying the domestic industry's true unused processing capacity would be closer to around 100,000 MT.

Finally, inventory data from the Commission's recent investigations demonstrates that the U.S. industry's end-of-period inventories of frozen warmwater shrimp had increased by nearly 70 percent between 2021 and 2023.[12] Indeed, by the end of 2023, the inventories reported by U.S. processors totaled about 36.6 million pounds (approximately 16,600 MT), or about half of Nekkanti's total annual production. These inventories have remained so elevated that the U.S. Department of Agriculture announced a purchase of frozen warmwater shrimp under Section 32 in August of this year.[13]

Taken collectively, these data demonstrate that the domestic shrimp industry possesses ample capacity to rapidly replace the supply currently provided by Nekkanti to the U.S. market.

Finally, ASPA notes that the requested relief would provide a meaningful benefit to U.S. consumers by enhancing the legal remedies to protect them from goods produced with forced labor. Substantial resources are expended each year by American consumers, by companies participating in voluntary compliance initiatives, and by civil society organizations to ensure American consumers are able to avoid unwittingly purchasing goods produced through the forced labor. Opinion polls demonstrate that American consumers are willing to spend more for products made without forced labor; indeed, one study found nearly 80 percent of American consumers polled would refuse to

[10] *Id.* at C-4.
[11] *Id.* at 4.
[12] *Id.* at III-22.
[13] U.S. Department of Agriculture, *Agricultural Marketing Service, Announcement for Section 32 Purchase of Canned Peaches, Concord Grape Juice, Fresh Mandarins, Pork, Prunes, Raisins, Walnuts, and Wild-Caught Shrimp* (Aug. 24, 2026), available at https://www.ams.usda.gov/content/announcement-section-32-purchase-canned-peaches-concord-grape-juice-fresh-mandarins-pork. One of the purposes of Section 32 is to divert surpluses of domestically produced agricultural goods and promote their domestic use. *See* 7 U.S.C. § 612c.

purchase certain brands altogether if they knew those brands sold products made using forced labor.[14] The mechanisms underlying such labels on imported goods often fail to provide consumers the surety they desire that certified goods are in fact produced according to the claimed ethical standards.[15]

Additionally, though Section 307 provides consumers some protection from tainted products, the rebuttable presumption created by the Uyghur Forced Labor Prevention Act does not apply to products such as shrimp from India,[16] leaving consumers more exposed to goods produced with forced labor outside the Uyghur region. As Complainants note, Section 307 has resulted in only a small number of withhold release orders.[17] Compared to the substantial forced labor risks that impact the American supply chain,[18] these low numbers leave consumers woefully exposed. Consumers cannot and should not be expected to bear the burden of sifting through a dizzying array of voluntary fair-trade labels to avoid products tainted with such egregious and fundamental rights violations.

For all these reasons, ASPA urges the Commission to initiate this investigation and to take action against this patently unfair competition. Please contact the undersigned with any questions.

Respectfully submitted,

/s/ Elizabeth J. Drake
Roger B. Schagrin
Elizabeth J. Drake
Amanda G. Swenson
SCHAGRIN ASSOCIATES
900 Seventh Street NW, Suite 500
Washington, D.C. 20001
(202) 223-1700
Counsel to the American Shrimp Processors Association

[14] Ipsos Public Affairs, *Majority (55%) of Americans Willing to Pay More for Clothing Not Made Using Child Labor* (July 18, 2013), available at https://www.ipsos.com/en-us/majority-55-americans-willing-pay-more-clothing-not-made-using-child-labor.

[15] MSI Integrity, *Not Fit-for-Purpose: The Grand Experiment of Multi-Stakeholder Initiatives in Corporate Accountability, Human Rights and Global Governance* (2020), available at https://www.msi-integrity.org/not-fit-for-purpose/.

[16] 22 U.S.C. § 6901.

[17] Complaint at 20.

[18] *See, e.g.,* Walk Free, *New Report Links Compounding Global Crises to Modern Slavery* (June 16, 2023), available at https://www.walkfree.org/news/2023/new-report-links-compounding-global-crises-to-modern-slavery/ (noting that in the 2023 Global Slavery Index, the United States, "was by far the biggest import of at-risk products (US$169.6 billion).")

Statement of Support from:

- **Bibamba Artisan Chocolate;**
- **Love's Ice Cream & Chocolate;**
- **Maverick Chocolate Company;**
- **Potomac Chocolate; and**
- **Xocolatl Chocolate**

U.S. International Trade Commission
Letter in support of Section 337 Complaint, Docket No. 3945

November 4, 2026

Statement of Interest

We are a group of U.S.-based cocoa and chocolate companies who believe that it is both possible and necessary to source cocoa produced without child and forced labor. Together, we have many decades of experience working in the chocolate sector.

We have an interest in this matter because as slave-free cocoa and chocolate companies, we are at a competitive disadvantage with respect to companies that source cheap cocoa produced with forced labor, including forced child labor. Much of the cocoa and chocolate imported into the United States is linked to supply chains that are tainted with this practice. The higher production costs associated with compliance with international human rights norms require us to sell our chocolate at higher prices, and our profitability is impaired when our pricing is suppressed by imports that are produced under noncompliant labor conditions. This is true regardless of whether the imports are of similar quality to our products.

We have thus far had limited success in addressing this scourge. Because the International Trade Commission ("ITC") can impose remedies under Section 337 of the Tariff Act of 1930 that will help immensely in the effort to eradicate foreign labor abuses that are linked to unfair competition in the U.S. market, and it has the opportunity to do so as a result of the complaint filed by U.S. shrimpers against certain imports of Indian shrimp, we urge the ITC to institute an investigation into the allegations raised in that complaint.

As companies that spend time, effort, and money investing in clean supply chains, we believe it is of vital importance that the ITC institute this investigation and conduct the first Section 337 investigation into allegations of forced labor in a U.S.-facing supply chain. We believe that the ITC should not permit the U.S. market to be inundated with imports from an industry that fails to observe basic, internationally recognized norms and rights, including forced labor. It is unfair to companies like ours who have to compete with goods produced with forced labor.

We respectfully request that the ITC institute the investigation.

Sincerely,

Suzanne Strobel
Marketing & Communications Manager
Bibamba Artisan Chocolate

Shawn Askinosie 10/24/26



Chris McKellar
Founder
Love's Ice Cream & Chocolate
Grand Rapids, Michigan



Paul Picton
President
Maverick Chocolate Company
129 W Elder St
Cincinnati, Ohio
513-381-0561



Ben Rasmussen
Owner, Potomac Chocolate



Elaine Read
Xocolatl Chocolate

Statement of Support from:

United Auto Workers (UAW)

Solidarity House
8000 EAST JEFFERSON AVE.
DETROIT, MICHIGAN 48214
PHONE (313) 926-5000

INTERNATIONAL UNION, UNITED AUTOMOBILE, AEROSPACE & AGRICULTURAL IMPLEMENT WORKERS OF AMERICA – UAW

SHAWN FAIN, *PRESIDENT* • BRANDON CAMPBELL, *SECRETARY-TREASURER*
VICE-PRESIDENTS: LAURA DICKERSON • KEVIN GOTINSKY • RYAN HIESTAND

November 12, 2026

U.S. International Trade Commission
500 E Street SW
Washington, DC 20436

Comment in Support Re: Docket No. 3945

The United Auto Workers (UAW) is a major North American labor union representing more than one million active and retired workers across a diverse range of sectors. While originally founded to organize workers in automotive manufacturing, the union's membership also spans aerospace, heavy machinery, agricultural equipment, higher education, healthcare, gaming, and public services.

The UAW supports labor-standard-compliant working conditions around the world. Plainly stated, we are opposed to violations of internationally recognized labor rights, including violations to the rights to freedom of association, collective bargaining, and freedom from forced labor. In fact, these rights are deeply interdependent and, when they are violated in a particular industry, the harm is not limited to that industry or even to the country in which the abuse is occurring. We therefore urge the International Trade Commission (ITC) to institute an investigation of the complaint (Docket No. 3945) filed by U.S. shrimpers alleging imported shrimp from India is produced with forced labor and therefore unfairly competes with their legally harvested products.

This Commission has an opportunity to conduct the first Section 337 investigation into allegations of forced labor in a U.S.-linked supply chain. Issuance of the relief requested will send a resounding message to companies around the world that they can expect accountability from the ITC **if they continue to violate human and labor rights in an effort to obtain commercial advantages in the U.S. market.** This exploitative strategy is not in the interests of public health and welfare, competitive economic conditions in the U.S., U.S. production of like or directly competitive articles, or U.S. consumers.

The ITC should not permit the U.S. market to be inundated with imports from an industry that fails to observe basic and internationally recognized labor rights, which failure centers in this instance on the right to be free of the condition of forced labor. The complaint filed by U.S. shrimpers clearly documents egregious abuses of this right in the Indian shrimp industry and their impact on law-abiding U.S. businesses.

We respectfully encourage the ITC to initiate the investigation raised by the complaint.

Sincerely,

Kristyne Peter
International Affairs Director, UAW

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Statement of Support from:

Verité

U.S. International Trade Commission
Letter in support of Section 337 Complaint - Docket No. 3945
November 6, 2026

Statement of Interest

Verité appreciates the opportunity to submit comments in response to the U.S. International Trade Commission's November 3, 2026, “Notice of Receipt of Complaint and Solicitation of Comments Relating to the Public Interest concerning Certain Shrimp and Products Containing Same.”

Verité is an independent nonprofit organization with more than 30 years of experience working to advance fair labor in global supply chains. We work with companies, governments, civil society organizations, and workers to identify forced labor risks, strengthen labor protections, and develop practical approaches to preventing and addressing exploitation.

We write to encourage the Commission to institute an investigation and address whether, in this instance, the use of forced labor in the production of imported goods constitutes an injurious unfair act or method of competition under Section 337 of the Tariff Act of 1930. In Verité's view, this question merits careful consideration and a substantive determination by the Commission because forced labor is not only a serious violation of fundamental human rights, but also a practice that can distort competition in U.S. markets.

Verité's work has shown that forced labor can become embedded in recruitment and employment systems, particularly in complex global supply chains where workers have limited bargaining power and limited access to remedy. Workers may incur substantial debts to obtain employment, have identity documents withheld, experience restrictions

on their movement, face threats of retaliation, or become unable to leave employment without suffering severe financial or personal consequences, all of which are recognized by the International Labour Organization (ILO) as indicators of forced labor. They are practices that can deprive workers of their freedom and enable employers to extract labor through coercion.

The economic dimensions of forced labor are significant. The International Labour Organization estimates that forced labor generates hundreds of billions of dollars in illegal profits globally each year.[1] Those gains arise in part from the suppression of wages, the shifting of recruitment and employment costs onto workers, the extraction of excessive overtime, and other coercive practices that allow labor costs to be reduced below levels achievable through lawful employment practices. The resulting economic benefit is not simply the product of efficiency, innovation, or legitimate comparative advantage. Rather, it is derived from denying workers rights and freedoms that are recognized under international labor standards.

For this reason, forced labor should also be understood as a market-distorting practice. Businesses that rely on coercive labor arrangements may obtain production costs that are artificially reduced through the unlawful transfer of costs and risks onto workers. These cost advantages can affect pricing, market access, and competitive conditions in ways that responsible businesses cannot and should not be expected to replicate. When goods produced under such conditions enter U.S. commerce, the economic effects extend beyond the workplace and into the competitive marketplace. To the

[1] International Labour Organization, *Profits and Poverty: The Economics of Forced Labour* (2024 rev. ed.), at 13.

extent such advantages materially influence competition in the U.S. market, they raise precisely the type of competitive concerns that Section 337 was designed to address.

We recognize that differences in production costs and wage levels are a normal feature of international trade. The concern here is not that imported products are produced in countries with lower labor costs. Rather, the concern is that some of those costs may be reduced through practices that deprive workers of fundamental rights and freedoms. Businesses should be able to compete on the basis of quality, innovation, productivity, and legitimate efficiencies without facing pressure to tolerate exploitation within their supply chains.

Congress has long recognized the connection between forced labor and the integrity of U.S. commerce. Section 307 of the Tariff Act prohibits the importation of goods produced wholly or in part with forced labor, reflecting a longstanding determination that products made through coercive labor practices should not enter the U.S. market. Congress reinforced that determination when it eliminated the consumptive demand exception in 2015, strengthening the prohibition against the importation of forced labor goods.

The existence of Section 307 should not be viewed as a reason for declining to examine forced labor under Section 337. To the contrary, Congress's decision to prohibit imports made with forced labor underscores the seriousness with which U.S. trade policy views such practices. Section 307 and Section 337 serve distinct but potentially complementary functions. While Section 307 addresses the importation of goods produced with forced labor, Section 337 addresses unfair methods of competition and unfair acts associated with imports. The Commission need not view these authorities as

mutually exclusive where the same underlying conduct both violates workers' rights and confers an improper competitive advantage.

Indeed, the question presented by this complaint is not whether forced labor is unlawful. That question has already been answered by Congress. The question before the Commission is whether the commercial advantages obtained through worker coercion may also constitute an unfair method of competition or unfair act within the meaning of Section 337. Given the significant cost distortions that forced labor may generate, we believe this is an appropriate question for the Commission's consideration.

Verité recognizes that allegations of forced labor require careful factual examination. Determining whether forced labor exists is rarely straightforward, particularly where recruitment systems, labor intermediaries, subcontracting arrangements, and employment relationships are complex or opaque. Credible determinations should be grounded in evidence, informed by internationally recognized indicators and standards, including those developed by the International Labour Organization, and accompanied by appropriate procedural protections for affected parties.

Verité also encourages the Commission to consider the interests of workers in its examination of the public interest. Trade enforcement can play an important role in changing business incentives, but the consequences for workers should not be overlooked. Where forced labor is identified, efforts to address it should support meaningful remediation and encourage businesses to strengthen their due diligence, recruitment practices, and engagement with workers.

The question presented here extends beyond the shrimp industry or the companies named in the complaint. It concerns whether U.S. trade law recognizes the competitive

consequences of forced labor alongside the serious harm it causes workers. For companies investing in responsible labor practices, clarity on this question is also important to maintaining fair conditions of competition.

Verité urges the Commission to recognize that forced labor is fundamentally incompatible with fair competition and to address directly whether the economic advantages derived from worker coercion in this instance are prohibited under Section 337.

Given the significance of that question for workers, responsible businesses, and the integrity of U.S. markets, the issue warrants full consideration in this investigation. We believe this question merits a reasoned determination by the Commission, rather than being left solely to enforcement under other provisions of U.S. trade law.

Thank you for your consideration.

Sincerely,

/s/ Elizabeth C. Fay

Elizabeth C. Fay
Senior Director of Policy Advocacy
Verité

Statement of Support from:

Oxfam America

Letter in support of Section 337 Complaint Docket Number 3945

November 9, 2026

I. Statement of Interest

Oxfam America is a non-profit organization that works to end poverty, inequality, and injustice. We work as part of a global federation operating in 77 countries to provide emergency aid to those fleeing conflict or natural disaster; offer technical advice and grants to help communities secure access to food and water; and advocate that governments and companies respect human rights.

As part of that mission, Oxfam's Private Sector Department works with companies across a variety of industries to encourage the adoption of robust human rights policies. This involves working with agribusiness companies, food traders and retailers to confront forced labor[1] in high-risk supply chains like seafood. Oxfam has developed expertise in understanding the human toll and economic implications not only for those individuals forced into labor, but for a range of stakeholders, including domestic producers playing by the rules. We have an interest in this matter because it is critical for the U.S. government to incentivize companies to respect human rights and to minimize the risk U.S. companies face competitive disadvantage for respecting basic human rights.

II. Market Distortion Stemming from Forced Labor

First, we support the investigation of Docket Number 3945 due to the market distortions generated by forced labor. Companies that produce goods with forced labor gain a substantial advantage over those that

[1] DHS defines forced labor as occurring "when individuals are compelled against their will to provide work or service through the use of force, fraud, or coercion." U.S. Department of Homeland Security, "Blue Campaign: What is Forced Labor?" https://www.dhs.gov/blue-campaign/forced-labor. The ILO Convention No. 29 similarly defines it as "all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily." International Labour Organization, Convention Concerning Forced or Compulsory Labour (No. 29), June 28, 1930, 39 U.N.T.S. 55 (hereinafter ILO 29).

pay their workforce a fair wage.[2] Drastically reducing or even eliminating labor expenses enables these companies to undercut competitors on price,[3] ultimately depressing the sales and profits of more ethical producers. As the U.S. Trade Representative remarked, "[i]n addition to constituting a human rights abuse, forced labor is used to gain a competitive advantage by reducing production costs. For that reason, forced labor not only harms the working people subjected to it, but also companies that do not rely on forced labor to produce their goods."[4] The ILO reports that perpetrators generate a staggering $236 billion USD in profits annually,[5] gains that come at the expense of the workers and ethical companies alike.

This dynamic is particularly pronounced in labor-intensive[6] industries like apparel, mining, and agriculture, where firms using forced labor gain an even larger competitive advantage.[7] Given that seafood production is labor-intensive, U.S. producers paying fair wages not only have to compete with the vastly divergent cost of living between the U.S. and other geographies, but are further disadvantaged when competing against producers that compel their employees to work through force or coercion. These distortions hurt ethical producers and have pernicious ripple effects: because unethical firms can dominate the market through lower pricing strategies, this creates a race to the bottom in which even well-intentioned businesses are pressured to compromise on labor standards in order to survive.[8]

Finally, firms relying on forced labor shift the social and economic burdens onto workers and society as a whole. Those who survive forced labor often suffer from serious health problems, loss of future

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[2] Sarah Lee, The Economics of Forced Labor, Number Analytics, (May 25, 2025), https://www.numberanalytics.com/blog/economics-forced-labor#google_vignette.
[3] A. Crane, G. LeBaron, K. Phung, L. Behbahani, & J. Allain, "Modern slavery in global supply chains: Legal and policy challenges," Journal of Business Ethics, at p. 160(4), 745–761, (2019), *available at* https://doi.org/10.1007/s10551-018-3866-4.
[4] United States Trade Representative, "U.S. Government Trade Strategy to Combat Forced Labor," (Jan. 13, 2025).
[5] International Labor Organization, "Forced Labor, Modern Slavery, and Trafficking in Persons," https://www.ilo.org/topics-and-sectors/forced-labour-modern-slavery-and-trafficking-persons.
[6] Labor intensive industries stand in contrast to capital intensive industries, which can rely more heavily on mechanized production. *See* Investopedia, Capital Intensive: Definition, Examples, and Measurement, (Feb. 20, 2024), https://www.investopedia.com/terms/c/capitalintensive.asp.
[7] *Id. See also* G. LeBaron, Combatting modern slavery: Why labour governance is failing and what we can do about it, (2020), Polity Press.
[8] G. LeBaron & J. Lister, "Benchmarking global supply chains: The power of the "ethical audit" regime," Review of International Studies, p. 41(5), 905–924, (2015), *available at* https://doi.org/10.1017/S0260210515000388.

income opportunities, and lack of transferrable skills — costs that must be absorbed by local communities, governments, or humanitarian organizations.[9] By contrast, companies paying fair wages and providing safe working conditions internalize these costs.[10] Their higher prices more accurately reflect the true cost of ethical production, but this makes them vulnerable to being outcompeted by those engaging in exploitative practices.

Effective accountability mechanisms can level the playing field. They help to ensure that producers think twice before cutting labor costs in ways that are abusive to workers, slow the race to the bottom, and minimize the likelihood that the externalities of forced labor will cost everyone in society except the perpetrators exploiting them.

III. International Law and Forced Labor

Second, we urge the ITC to investigate because the alleged misconduct constitutes a gross violation of international law.[11] Forced labor violates numerous treaties that the U.S. has ratified, including the International Labor Organization (ILO) Convention No. 105 (the Abolition of Forced Labor Convention);[12] the International Covenant on Civil and Political Rights (ICCPR);[13] and the United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons (the Palermo Protocol).[14] It

[9] J. Allain, A. Crane, G. LeBaron, & L. Behbahani, "Forced labour's business models and supply chains," Joseph Rowntree Foundation, (2013), https://www.jrf.org.uk/report/forced-labour%E2%80%99s-business-models-and-supply-chains.
[10] *Id.*
[11] UN Special Rapporteur on Trafficking, "Combatting Trafficking in Persons in Global Supply Chains," https://www.ohchr.org/en/special-procedures/sr-trafficking-in-persons/combatting-trafficking-persons-global-supply-chains. In addition to constituting a gross violation under customary international law and international humanitarian law, the U.S. State Department recognized forced labor as a "gross violation of international law" in its 2023 Global Magnitsky Act sanctions lodged against a former Indonesian government official for imprisoning men and forcing them to work on his palm oil plantation. Nina Moraitou-Politzi, Amanda Strayer and Suchita Uppal, "Sanctioning Human Trafficking Under the Global Magnitsky Program," Just Security, (Nov. 24, 2025), https://www.justsecurity.org/104756/human-trafficking-magnitsky-sanctions/.
[12] International Labor Organization, Abolition of Forced Labour Convention, No. 105, (1957), https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C105
[13] International Covenant on Civil and Political Rights, Dec. 16, 1966, 999 U.N.T.S. 171, at art. 8(3)(a) (barring forced or compulsory labor).
[14] The United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons (Palermo Protocol), A/RED/55/25 (Nov. 15, 2000).

similarly contravenes an even more expansive framework of customary international law[15] that all states are bound to uphold, including the ILO Convention No. 29 (the Forced Labor Convention)[16] and the Universal Declaration of Human Rights.[17] The prohibition on forced labor constitutes a *jus cogens* obligation, meaning that no derogation is permitted under any circumstances and that the international community has an obligation to protect these fundamental human rights.[18] Further, when a government official, corporate executive, or other person enslaves a civilian population in a widespread or systematic manner, that forced labor constitutes a crime against humanity under international criminal law.[19] Few human rights abuses are as universally condemned as forced labor.

Despite the robust legal framework, enforcement remains uneven. Many countries struggle with limited policing capacity, corruption, under-resourced courts, or lack of political will to address forced labor effectively.[20] Weak enforcement is exacerbated by opaque global supply chains that allow forced labor to flourish undetected in subcontracted or offshore operations: the ILO estimates that approximately 27.6 million children, women and men are subjected to forced labor worldwide.[21] This includes128,000 people forced into labor on fishing vessels isolated from the reach of authorities[22] and still more subjected to forced labor on seafood farms and processing plants on shore.[23] The erratic implementation of

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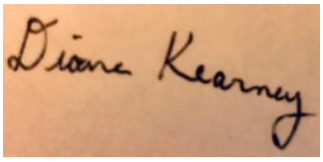
[15] *See generally* Oona A. Hathaway, Christopher Ewell, Nicole Ng, Ellen Nohle and Alasdair Phillips-Robins, "Nestlé & Cargill v. Doe Series: The Prohibitions on Slavery, Forced Labor, and Human Trafficking Meet the Sosa Test," Just Security, (Nov. 23, 2020), https://www.justsecurity.org/73508/nestle-cargill-v-doe-series-the-prohibitions-on-slavery-forced-labor-and-human-trafficking-meet-the-sosa-test/ (describing the roots of customary international law's prohibitions on forced labor).
[16] ILO 29, *supra* note 1.
[17] UN General Assembly, the Universal Declaration of Human Rights, A/RES/217(III) (Dec. 10, 1948).
[18] Santiago Villalpando, Forced Labor/Slave Labour, Max Planck Encyclopedia of International Law, https://opil.ouplaw.com/display/10.1093/law:epil/9780199231690/law-9780199231690-e801.
[19] Rome Statute, Art. 7(c), (1998).
[20] International Labour Organization, "Global estimates of modern slavery: Forced labour and forced marriage," (2021), https://www.ilo.org/global/publications/books/WCMS_854733/lang--en/index.htm.
[21] ILO, "Data and research on forced labor," https://www.ilo.org/topics/forced-labour-modern-slavery-and-trafficking-persons/data-and-research-forced-labour.
[22] Stanford University Center for Ocean Solutions, "Addressing Illegal Labor and Fishing Abuses," https://oceansolutions.stanford.edu/key-initiatives/addressing-illegal-fishing-and-labor-abuses#:~:text=The%20International%20Labor%20Organization%20(ILO)%20estimates%20that,fishing%20vessels%20worldwide%2C%20often%20far%20from%20shore (quoting the IOM).
[23] Ian Urbina, How Uyghur Forced Labor Makes Seafood That Ends Up in School Lunches, Politico, (Nov. 21, 2023), https://www.politico.com/news/magazine/2023/11/21/chinese-forced-labor-seafood-00126642

international law's prohibitions on forced labor means that ramping up enforcement, particularly from countries with strong rule of law and institutions, is critical if the world is to meaningfully combat forced labor.

IV. Conclusion: Moving Towards Market Fairness and Legal Accountability

Forced labor remains among the most egregious, widespread and under-prosecuted human rights violations. Not only does it devastate the lives of workers and their families, but it distorts markets in ways that can make ethical production financially challenging or even impossible. While international law condemns the practice in no uncertain terms, inadequate enforcement and global supply chain opacity enable its persistence. Companies that invest in fair wages and labor conditions operate at a disadvantage when the market is skewed by exploitation. Through stronger regulation, corporate due diligence, and consumer engagement, it is possible to curb forced labor and restore equity to global commerce. We respectfully encourage the ITC to investigate Docket Number 3945 to that end.

Sincerely,



Diana Kearney

Legal Lead, Oxfam America

Statement of Support from:

Oceana

November 10, 2026

Statement of Interest
In the Matter of: CERTAIN SHRIMP AND PRODUCTS CONTAINING SAME
Docket No.3945

Commissioners:

By this letter, Oceana wishes to express its support for the above-mentioned investigation request submitted by Complainants Versaggi Shrimp Corp. and W&W Dock LLP. We urge the International Trade Commission to investigate Section 337 violations by foreign producers and U.S. sellers of Indian shrimp produced with forced labor. With approximately 90% of the shrimp consumed in the U.S. being imported, it is critical to stop the import and sale of shrimp caught using forced labor.

Oceana is the largest international nonprofit organization focusing solely on oceans. We are dedicated to achieving measurable change by conducting specific, science-based policy campaigns with fixed deadlines and articulated goals. One of Oceana's campaigns is to stop illegal, unreported, and unregulated (IUU) fishing, increase transparency at sea, and require traceability to ensure that all seafood sold in the U.S. is safe, responsibly sourced, honestly labeled, and legally caught.

Currently, an estimated 128,000 fishers are in forced labor situations at sea worldwide. In July 2026, Oceana reported on the realities of forced labor, producing a short film and publishing a blog detailing the abuses endured by former victims of forced labor.

The conditions they faced mirrored those experienced by victims of forced labor in the seafood industry all around the world: grueling, unpaid work; lack of training and supplies; confiscation of passports and identification documents; denial of medical care, sleep, food, water, and contact with loved ones; physical, verbal, and psychological abuses; and confinement on vessels for indeterminate periods of time (sometimes trapping fishers on board for years).

The use of forced labor in the global seafood industry, whether in aquaculture, the catching of seafood aboard foreign fishing vessels, or in processing at foreign facilities, constitutes a significant distortion of international trade that places American fishermen and domestic seafood producers at an unfair competitive disadvantage. Moreover, as the ITC explained in 2021, the U.S. imports nearly $2.4 billion in IUU seafood each year, potentially reducing U.S. fishers' income by an estimated $60 million per year. Globally, the diversion of fish from legitimate fishing to IUU fishing costs $26-50 billion.

Foreign producers that rely on forced labor benefit from artificially suppressed production costs, allowing them to bring seafood products to the U.S. market at prices that law-abiding American fishermen and processors, who must compensate workers fairly and comply with U.S. labor and regulatory requirements, cannot reasonably be expected to match. This creates an uneven competitive environment in which the economic advantage is derived not from greater efficiency, innovation, or productivity, but from the exploitation of vulnerable workers and the avoidance of legitimate labor costs. If the flow of illegal

seafood into the U.S. were stopped, American fishermen would see a major increase in their income.

Congress and the Administration are well aware of the threats posed by IUU fishing and have taken some steps to restrict entry into the U.S. of products produced by IUU fishing. In 2023, the United States took a significant step toward addressing human rights in the seafood industry, as new authority under the fiscal year 2023 National Defense Authorization Act allowed for forced labor to be considered as part of IUU fishing under the Moratorium Protection Act. One bill currently active in the 119th Congress acknowledges the serious threat posed by IUU fishing, highlighting that "IUU fishing is often associated with substandard and illicit conditions for crew, including lack of safety controls, illegally low pay, inhumane treatment, and, in some cases, outright forced labor or human trafficking;" "IUU fishing undermines the economic security of the United States and undermines maritime security around the globe;" and "the United States Government should utilize sanctions to deter and prevent IUU fishing." Despite these emerging efforts to address forced labor in the seafood industry, the U.S. has not yet used these authorities to address the forced labor concerns in the Indian shrimp industry that the Complainants have described. The Commission has an opportunity to rectify this situation by investigating the allegations raised by the Complainants.

Forced labor should be recognized not only as a grave human rights violation but also as a trade-distorting practice with measurable economic consequences for U.S. commercial fisheries, seafood processors, and coastal communities. The Commission

should consider the extent to which forced labor at both the harvesting and processing stages reduces foreign production costs, suppresses import prices, displaces domestic market share, and undermines the ability of American seafood producers to compete on a fair and equitable basis.

We urge the International Trade Commission (ITC) to take action and pursue Docket No.3945.

Sincerely,

/s/ Madeline Collins
Staff Attorney
Oceana

Statement of Support from:

International Corporate Accountability Roundtable

U.S. International Trade Commission
Letter in support of Section 337 Complaint
Docket No. 3945

November 05, 2026
Statement of Interest

Dear Commissioners:

The International Corporate Accountability Roundtable ("ICAR") works to advance corporate accountability and the protection of human rights in business activities and global supply chains. ICAR urges the U.S. International Trade Commission (ITC) to institute an investigation into the allegations in the complaint brought by U.S. shrimpers against certain imported shrimp from India. The complaint raises an important question: whether the use of forced labor to obtain a competitive advantage in goods sold in the United States constitutes an unfair method of competition within the meaning of Section 337 of the Tariff Act of 1930, 19 U.S.C. § 1337(a)(1)(A).

Forced labor is both a serious human rights abuse and a source of unfair commercial advantage. In its June 2, 2026 Section 301 report, the Office of the U.S. Trade Representative (USTR) found that forced labor artificially lowers production costs, enabling producers to offer goods at reduced prices while generating profits untethered from legitimate market efficiencies.[1] USTR further recognized that these artificially low prices distort competitive conditions, undermine the profitability of businesses that comply with labor protections, and threaten domestic industries. As USTR explained, it is a fundamental distortion of market principles to expect legitimately operating firms to compete against producers that derive cost advantages from forced labor. Although USTR's findings arise under Section 301, they provide a compelling economic basis for investigating whether forced labor constitutes an unfair method of competition under Section 337.

This concern is particularly acute in the shrimp sector. Corporate Accountability Lab's March 2024 report, *Hidden Harvest: Human Rights and Environmental Abuses in India's Shrimp Industry*, documents serious labor abuses and indicators of forced labor, including debt bondage, restrictions on workers' freedom of movement, and coercive working conditions.[2] These practices raise concerns that certain producers may obtain artificial cost advantages through worker exploitation, enabling them to offer lower-priced shrimp in the U.S. market. Such practices may disadvantage domestic shrimpers, who must comply with U.S. labor protections while competing against imported products potentially benefiting from unlawful labor practices. An investigation would allow the Commission to assess whether the alleged conduct constitutes an unfair method of competition and whether the

[1] Off. of the U.S. Trade Rep., Report in Section 301 Investigations of the Acts, Policies, and Practices of Various Economies Related to the Failure to Impose and Effectively Enforce a Prohibition on the Importation of Goods Produced with Forced Labor (June 2, 2026), https://ustr.gov/sites/default/files/files/Press/Releases/2026/USTR%20Report%20Sec%20301%20FL%20301%206-2-26%20FINAL%20for%20upload.pdf.

[2] *Hidden Harvest: Human Rights and Environmental Abuses in India's Shrimp Industry*, Corporate Accountability Lab (March 2024), https://corpaccountabilitylab.org/hidden-harvest.

challenged imports threaten to destroy or substantially injure the domestic industry within the meaning of Section 337.

Institution would also serve important public-interest considerations. If the allegations are substantiated, relief targeting shrimp produced through unfair methods of competition could help restore fair competitive conditions by preventing suppliers from benefiting from artificially reduced labor costs. Such relief could protect domestic shrimp production and reinforce the principle that competitive success should not depend on worker exploitation. ICAR recognizes that the Commission must also consider the potential effects of any exclusionary remedy on U.S. consumers, including product availability and prices. These considerations warrant careful examination during an investigation rather than foreclosing institution at the outset. For ICAR, ensuring that businesses cannot obtain commercial advantages through coercive labor practices is essential to protecting workers, responsible businesses, and the integrity of U.S. markets.

ICAR respectfully urges the Commission to institute the requested investigation.

Sincerely,

/s/ David McKean

David McKean
Executive Director
International Corporate Accountability Roundtable (ICAR)

Statement of Support from:

Accountability Counsel

10 November 2026

United States International Trade Commission
Letter in support of Section 337 Complaint
Docket No. 3945

Accountability Counsel is an international non-profit organization that supports communities seeking redress for environmental and human rights harm. Drawing on our experience working in partnership with communities, we have advised on the creation or development of nearly every existing independent accountability mechanism at an international financial institution and bilateral development agency. We have additionally advised on the performance of the OECD National Contact Points for Responsible Business Conduct. Our case experience has shown that effective non-judicial and quasi-judicial accountability mechanisms can be transformative for communities, who often have few or no other channels to raise concerns and achieve remedy for environmental, labor, and human rights.

We urge the International Trade Commission (ITC) to institute an investigation into the allegations contained in the complaint filed by U.S. shrimpers against certain imported shrimp from India. Accountability Counsel has an interest in this case due to its potential to align international business practices with respect for human rights. Forced labor is an egregious violation of international law. It harms not only the foreign workers subjected to it, but also domestic workers whose livelihoods depend on fair competitive practices. Holding companies accountable for using forced labor as a cost-cutting competitive advantage is critical to promoting trade practices that uphold the rights of workers everywhere.

Quasi-judicial mechanisms for accountability are crucial for communities whose other institutions have failed to protect their rights. The ITC is uniquely positioned to effectively enforce accountability for human rights violations in international business through its transparent investigative process and trade expertise. Setting the precedent that forced labor is an unfair trade practice would ensure that U.S. competitors are not penalized for complying with their domestic and human rights obligations. Penalties such as import bans are important methods of accountability that can

disincentivize international trade activity which violates the labor rights of workers.

Pervasive forced labor in an industry has far-reaching consequences that fall under the ITC's mandate. We respectfully encourage the ITC to investigate U.S. shrimper's claims regarding such.

Sincerely,

Stephanie Amoako and Alexis Luckett

/s/ Stephanie Amoako
/s/ Alexis Luckett

Accountability Counsel

Statement of Support from:

Human Trafficking Legal Center

U.S. International Trade Commission (ITC)
500 E Street, SW
Washington, DC, 20436

November 11, 2026

Re: Letter in Support of Complaint Pertaining to Certain Shrimp and Products Containing Same, DN 3945

Statement of Interest

The Human Trafficking Legal Center (the Center) connects trafficking survivors with pro bono representation so they can seek justice and thrive. We demand accountability from traffickers, governments, and corporations. The Human Trafficking Legal Center is headquartered in Washington, DC.

As explained below, we urge the International Trade Commission (ITC) to institute an investigation into the allegations contained in the complaint "Certain Shrimp and Products Containing Same, DN 3945" filed on October 28, 2026.

The Human Trafficking Legal Center has spent more than a decade advocating for robust enforcement of federal anti-trafficking laws to eradicate forced labor. Over the last few years, the organization has developed an array of tools to combat forced labor: petitions under the U.S. Tariff Act Section 307, strategic litigation, data-driven research, advocacy, and coalition-building. Our vision is to upend the systems that allow forced labor and human trafficking to flourish. The organization works in coalition with partner organizations across the globe, seeking to build a world where there is justice for trafficking survivors and no safe harbor for forced labor.

An essential element of our work is to advocate that governments around the world do more to keep forced labor goods out of their markets. We believe forced labor and other illegal and unethical practices are unfair trade practices that undermine fair competition. Forced labor harms workers, and not only in the fishing and aquaculture sectors. Goods produced with forced labor reach the U.S. and other markets at lower cost, undercutting companies that respect workers' rights and comply with labor laws. Opaque sourcing and limited traceability allow these goods to evade enforcement. New approaches are needed to hold bad actors accountable for violations of key internationally recognized labor rights in global supply chains.

Our organization has an interest in this matter because the case could mark an important milestone for enforcement. The ITC has an opportunity to conduct the first Section 337 investigation into allegations of human rights abuse in a U.S.-facing supply chain. A successful investigation would send a clear message to companies around the world: they cannot expect impunity from this agency if they rely on such abuses to gain a commercial advantage in the U.S. market. In our view, that exploitative business strategy does not serve the public health and welfare. Permitting forced labor that undercuts U.S. workers does not serve competitive conditions in the U.S. economy. Forced labor in imported goods does not serve the production of like or directly competitive articles in the United States. To the contrary, this harms U.S. consumers and workers. The ITC should not allow the U.S. shrimp market to be flooded with imports from companies that fail to respect basic labor rights.

The commercial harm in this case cannot be separated from the ongoing harm to the workers who produce these goods for export to the United States. Fair labor and trade are more closely linked than is often acknowledged. When forced labor lowers the cost of production, it distorts the market for everyone: law-abiding producers lose ground, and workers across the industry feel pressure on wages and conditions. Action here would benefit workers well beyond this supply chain. It would show that abusive practices carry real costs in the U.S. market, and it would give companies reason to compete on quality and responsible sourcing rather than on who can pay workers least and evade regulation most. The race to the bottom, toward the lowest wages and the weakest protections, should be a thing of the past. Our ultimate objective is fair competition that lifts labor conditions globally and benefits workers and communities around the world.

Signed,



Martina Vandenberg
President, The Human Trafficking Legal Center

Statement of Support from:

Worker Rights Consortium

WORKER RIGHTS CONSORTIUM

Worker Rights Consortium
2001 L Street NW, Suite 500
Washington, DC 20036

WORKERSRIGHTS.ORG

U.S. International Trade Commission

Letter in Support of Section 337 Complaint – Docket 3945

November 2, 2025

Statement of Interest

I am writing on behalf of the Worker Rights Consortium (WRC), a Washington, DC-based nonprofit organization established in 2000, which is dedicated to advancing labor rights, including freedom from forced labor, in global supply chains. As explained below, the WRC urges the U.S. International Trade Commission (ITC) to institute an investigation into the allegations contained in the complaint filed by U.S. shrimpers against forced labor abuses in the cultivation of certain shrimp imports from India.

An essential element of our work is to call on multinational brands and retailers to do more to keep forced labor goods out of their supply chains. We believe forced labor–along with other illegal and unethical practices–is undermining fair competition and fair working conditions, including, but not limited to, in the fishing and aquaculture sectors. We need to find new ways to hold companies accountable for violations of key internationally recognized rights.

The WRC has an interest in this matter because the case has the potential to set an important precedent. The ITC has an opportunity here to conduct the first Section 337 investigation into allegations of human rights abuse in a U.S.-facing supply chain. A successful investigation will help send a message to companies around the world that they cannot expect impunity if they use such abuses to obtain commercial advantages in the U.S. market.

In our view, such exploitative business strategies are not in the interests of public health and welfare, fair competition and working conditions in the U.S. or in other countries. The ITC should investigate this reported use of forced labor, the result of which is harm to the workers who produce these goods for export to the United States, as well as to workers in our own country as well.

Yours sincerely,



Benjamin Hensler
General Counsel

Statement of Support from:

Global Labor Justice

Docket No. 3945

Brett W. Doyle
Chairman
U.S. International Trade Commission
500 E Street, SW
Washington, DC, 20436

November 12, 2026

Dear Chairman Doyle:

Global Labor Justice is a non-governmental, not-for-profit organization based in Washington, D.C. that supports workers and unions around the world in exercising their freedom of association. We also work transnationally to advance policies and laws that protect decent work; to strengthen fundamental labor rights and workers' ability to advocate for their rights; and to hold corporations accountable for labor rights violations, including forced labor, in their supply chains. We are writing to urge the International Trade Commission (ITC) to open an investigation under Section 337 of the U.S. Tariff Act of 1930 into allegations concerning the importation of goods produced with forced labor contained in the complaint filed by U.S. shrimpers against certain imported shrimp from India.

Global Labor Justice has an interest in this matter, as we work with unions around the world to defend workers' fundamental labor rights, including freedom from forced labor. We also participate in several coalitions that focus on the elimination of forced labor in transnational supply chains. As a core strategy for this work, we advocate for effective measures to prevent and remedy forced labor and to keep goods produced with forced labor out of international markets. These include the Tariff Act Advocates Group, which advocates for strengthened enforcement of the forced labor provision of the U.S. Tariff Act; the Coalition on Forced Labor in Trade, which advocates for the adoption and effective enforcement of forced labor import ban provisions in major importing economies; the U.S. Illegal, Unregulated, and Unreported (IUU) Fishing & Labor Rights Coalition; and the Coalition to End Forced Labour in the Uyghur Region. Global Labor Justice additionally convenes three coalitions dedicated to the elimination of forced labor and strengthened decent work for workers in global supply chains: the Cotton Campaign, which focuses on the elimination of state-imposed forced labor and the promotion of decent work for cotton workers in Uzbekistan and Turkmenistan; the Coalition for Labor Justice for Migrants in the Gulf; and the Seafood Working Group.

In our work with migrant workers' unions in various sectors across the globe, Global Labor Justice has observed how forced labor artificially reduces labor costs through systemic exploitative practices, such as shifting the cost of recruitment fees and related onto workers;

withholding workers' wages; failing to provide workers with adequate food, potable water, or housing; denying workers adequate personal protective equipment to keep them safe; and denying workers health insurance or access to medical care.[1]

Addressing forced labor in the seafood sector is especially critical, considering that the U.S. imports the majority of the seafood it consumes[2] and that U.S. government agencies, labor unions, civil society organizations, the media, and academics have extensively documented the prevalence of forced labor in global seafood supply chains.[3]

The ITC now has the opportunity to play its part in the effort to end forced labor in global supply chains. By opening a Section 337 investigation into forced labor practices in the seafood sector, the ITC will support the creation of a level playing field for U.S. businesses and American workers, as well as help advance the fundamental labor rights of workers around the world. A successful investigation will send a strong message to companies around the world that forced labor has no place in the U.S. market. We, therefore, urge your office to investigate the matter.

Sincerely,



Allison Gill
Legal Director
Global Labor Justice

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[1] *See, e.g.*, Global Labor Justice, *On the Hook: Forced Labor in StarKist's Supply Chain* (2026), https://globallaborjustice.org/media/uploads/2026/09/2026-09_On-the-Hook_GLJ-Report.pdf.
[2] NOAA, *Fisheries of the United States*, https://www.fisheries.noaa.gov/national/sustainable-fisheries/fisheries-united-states.
[3] *See, e.g.*, Corporate Accountability Lab, *Hidden Harvest: Human Rights and Environmental Abuses in India's Shrimp Industry* (2024), https://corpaccountabilitylab.org/hidden-harvest; US Department of Labor, *Supply Chain Study on Forced Labor in the Fishing Industry in Thailand* (2024), https://www.dol.gov/sites/dolgov/files/ILAB/Supply-Chain-Study-Thailand-Fish-508.pdf; https://globallaborjustice.org/media/uploads/2026/09/2026-09_On-the-Hook_GLJ-Report.pdf; Outlaw Ocean, *Bait to Plate*, https://baittoplate.theoutlawocean.com/.

Statement of Support from:

Transparentem

TRANSPARENTEM

U.S. International Trade Commission
Letter in support of Section 337 Complaint
Docket No. 3945

November 3, 2026

Statement of Interest

Transparentem, a U.S.-based non-governmental organization, transforms industries by allying with workers and communities to uncover abuses in global supply chains. We strategically engage with brands to push for immediate and long-term remediation of abuses at all levels of supply chains, and advocate for industry-wide improvements to labor rights policy and practice.

Over the past several years, numerous non-governmental organizations and journalists have exposed that some shrimp from India is produced under conditions of forced labor. We urge the International Trade Commission (ITC) to institute an investigation into the allegations contained in the complaint filed by U.S. shrimpers against certain imported shrimp from India.

A critical part of Transparentem's work is urging governments around the world to increase their efforts to combat forced labor, including by keeping goods made with forced labor out of their markets. Forced labor, in the fishing, aquaculture, manufacturing, mining, and other sectors, is a grave human rights violation and distorts markets, undermining fair competition for businesses that operate legally and harming their workers. The principle that importing goods made with forced labor disadvantages domestic businesses and harms Americans is consistent with Executive Order 14411 (Strengthening Customs Enforcement).

We need to find new ways to hold bad actors accountable for their violations of key internationally recognized rights – violations that have global economic consequences. Transparentem has an interest in this matter because this case could mark an important milestone. The ITC has an opportunity to conduct the first Section 337 investigation into allegations of human rights abuse in a U.S.-facing supply chain. A successful investigation will send a clear message to companies around the world that the ITC will act against those that use forced labor to gain a commercial advantage in the U.S. market.

The issuance of the relief requested by the U.S. shrimpers in this investigation is in the interest of the welfare of the United States because it promotes competitive conditions in the U.S. economy, which will benefit U.S. businesses and the workers that they employ. It is also in the interest of the workers who produce these goods for export to the United States. The ITC should not permit the U.S. shrimp market to be inundated with imports that are produced with forced labor.

Sheela Ahluwalia
/s/ Sheela Ahluwalia
Director of Policy and Advocacy
Transparentem

Statement of Support from:

Uyghur American Association

Docket No.3945

To: U.S. International Trade Commission
From: Uyghur American Association
Re: Letter in Support of Section 337 Complaint
November 9, 2026

Statement of Interest

The Uyghur American Association is a civil society organization that is dedicated to eradicating forced labor in the Xinjiang Uyghur Autonomous Region of China, as well as forced labor practices affecting Uyghurs and other Turkic minorities in other parts of China. We therefore have a strong commitment to advancing the effectiveness of U.S. legal tools that are intended to disincentivize forced labor, and we write to express our strong support for the complaint filed by U.S. shrimpers regarding the importation from India of shrimp produced under such abusive labor conditions. We urge the International Trade Commission (ITC) to institute a Section 337 investigation into this matter.

Forced labor is a particularly egregious form of unfair competition, as its victims are both the workers themselves as well as labor-standard-compliant suppliers of competing products. Forced labor is prevalent in many countries that export seafood and seafood products to the United States, including China. India, however, is the largest foreign supplier of shrimp to the United States, with its market share growing rapidly in recent years. The commercial harm from imports of Indian shrimp includes suppressed pricing and market share as well as loss of investment opportunities.

The ITC has an opportunity in response to the U.S. shrimpers' complaint to conduct the first Section 337 investigation into allegations of forced labor in a U.S.-facing supply chain. A successful investigation will send a resounding message to companies around the world that they cannot expect impunity from the ITC if they use such abuses to harm U.S. businesses. In our view, that exploitative, predatory strategy is not in the interests of public health and welfare, competitive conditions in the U.S. economy, U.S. production of like or directly competitive articles, or U.S. consumers. The ITC should not permit the U.S. shrimp market to be inundated with imports from an industry that fails to observe basic, internationally recognized labor rights.

We would be happy to provide you with additional information about our views on this critical matter.

Sincerely,

Dolan

Uyghur American Association

Statement of Support from:

Uyghur Rights Advocacy Project

Docket No.3945

To: U.S. International Trade Commission
From: Uyghur Rights Advocacy Project
Re: Letter in Support of Section 337 Complaint
November 04, 2026

Statement of Interest

The Uyghur Rights Advocacy Project is a civil society organization that is dedicated to eradicating forced labor in the Xinjiang Uyghur Autonomous Region of China, as well as forced labor practices affecting Uyghurs and other Turkic minorities in other parts of China. We therefore have a strong commitment to advancing the effectiveness of U.S. legal tools that are intended to disincentivize forced labor, and we write to express our strong support for the complaint filed by U.S. shrimpers regarding the importation from India of shrimp produced under such abusive labor conditions. We urge the International Trade Commission (ITC) to institute a Section 337 investigation into this matter.

Forced labor is a particularly egregious form of unfair competition, as its victims are both the workers themselves as well as labor-standard-compliant suppliers of competing products. Forced labor is prevalent in many countries that export seafood and seafood products to the United States, including China. India, however, is the largest foreign supplier of shrimp to the United States, with its market share growing rapidly in recent years. The commercial harm from imports of Indian shrimp includes suppressed pricing and market share as well as loss of investment opportunities.

The ITC has an opportunity in response to the U.S. shrimpers' complaint to conduct the first Section 337 investigation into allegations of forced labor in a U.S.-facing supply chain. A successful investigation will send a resounding message to companies around the world that they cannot expect impunity from the ITC if they use such abuses to harm U.S. businesses. In our view, that exploitative, predatory strategy is not in the interests of public health and welfare, competitive conditions in the U.S. economy, U.S. production of like or directly competitive articles, or U.S. consumers. The ITC should not permit the U.S. shrimp market to be inundated with imports from an industry that fails to observe basic, internationally recognized labor rights.

We would be happy to provide you with additional information about our views on this critical matter.

Sincerely,



Mehmet Tohti,
Executive Director

Uyghur Rights Advocacy Project

Statement of Support from:

Greenpeace USA

GREENPEACE

Monday, November 9, 2026

U.S. International Trade Commission
Letter from Greenpeace USA in Support of Institution of S337 Investigation regarding Certain Shrimp and Products Containing Same

Letter of Support Re: Docket No. 3945

Greenpeace USA is a civil society organization headquartered in Washington, DC and is committed to transforming the country's social, environmental, and economic systems to address the climate crisis, safeguard our planet for future generations, advance racial justice, and build an economy that prioritizes the interests of everyday working people.

We have been working for over a decade to advocate against forced labor in seafood and for stronger import controls that protect U.S. consumers, fishers, and our oceans. We urge the International Trade Commission (ITC) to institute an investigation of the complaint (Docket No. 3945) filed by U.S. shrimpers alleging imported shrimp from India is produced with forced labor and therefore unfairly competes with their legally-caught products.

We have an interest in this matter because it has the potential to represent an important milestone for ethical production. The agency has an opportunity to conduct the first Section 337 investigation into allegations of forced labor in a U.S.-linked supply chain. Issuance of the relief requested will send a resounding message to companies around the world that they can expect accountability from the ITC **if they continue to violate human and labor rights in an effort to obtain commercial advantages in the U.S. market.** This exploitative strategy is not in the interests of public health and welfare, nor of the sanctity of human rights, competitive economic conditions in the U.S., U.S. production of like or directly competitive articles, or U.S. consumers. The ITC should not permit the U.S. market to be inundated with imports from an industry that fails to observe basic and internationally recognized human and labor rights, which, in this instance, centers on the right to be free of the condition of forced labor. The petition filed by U.S. shrimpers clearly documents egregious abuses of this right in the Indian shrimp industry and their impact on law-abiding U.S. businesses.

Forced labor is a violation of both U.S. and international law. Multiple cases and investigations have shown that there are systemic problems with unscrupulous actors importing seafood caught, harvested, and/or processed using forced labor. Recent examples include:

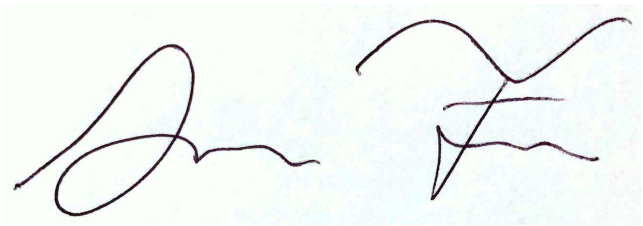
a) India Shrimp: A Growing Goliath: An investigation by Outlaw Ocean on the pervasiveness of forced labor in India's shrimp harvesting and processing

industry, also raising critical questions on the shortcomings of audits in preventing these abuses from occurring in U.S. seafood supply chains.

b) HIDDEN HARVEST Human Rights and Environmental Abuses in India's Shrimp Industry: A multi-year investigative report by Corporate Accountability Lab detailing the exploitative workplaces rife with forced labor, dangerous and abusive conditions, and environmental destruction in the Indian shrimp sector.
c) Netting Profits, Risking Lives: The Unresolved Human and Environmental Exploitation at Sea: A Greenpeace Southeast Asia report on forced labor and illegal, unreported and unregulated (IUU) fishing in Taiwanese distant water fishing, explaining how recruitment agencies reportedly benefit financially by exploiting migrant fishers and the clear links between vessels employing those practices and the U.S. market.
d) On the Hook: Forced Labor in StarKist's Supply Chain Report: A multi-year investigation by Global Labor Justice into Starkist's albacore tuna supply chain determined that there is a high likelihood of forced labor across all vessels examined.

Forced labor is especially prevalent in seafood supply chains and must be eradicated. All US government agencies tasked with trade, labor, and/or environmental responsibilities have a role to play, and we note in this regard an increasingly stretched National Oceanic and Atmospheric Administration (NOAA) and the current limited application of the Seafood Import Monitoring Program (SIMP), the latter of which does not cover all species of seafood, has an incredibly low audit rate and whose data is not harmonized with other government agencies, hampering its use as a tool to aid enforcement of U.S. import laws.

We respectfully encourage the ITC to initiate the investigation raised by the complaint.



Graham Forbes
Program Director, Greenpeace USA

Statement of Support from:

EarthRights International

U.S. International Trade Commission
Letter in support of Section 337 Complaint, Dkt. No. 3945

November 5, 2026

Statement of Interest

EarthRights International is a U.S. non-profit organization that advocates for responsible business practices and defends the rights of communities and individuals who have experienced harm as a result of business activities globally. We are writing to urge the International Trade Commission (ITC) to institute an investigation into the allegations contained in the complaint filed on October 28, 2026 by U.S. shrimpers against certain imported shrimp from India.

For over 30 years, EarthRights has witnessed how human rights abuses in global supply chains not only harm local communities, but also create unfair conditions for businesses that choose to act responsibly. We believe forced labor–along with other illegal and unethical practices–has an adverse effect on fair competition, and not merely in the fishing and aquaculture sectors.

EarthRights International has an interest in this matter because the ITC has an opportunity to conduct the first Section 337 investigation into allegations of human rights abuses in a U.S.-facing supply chain. If the investigation finds that these allegations are true, and takes action to remedy it, both the investigation and the remedies enacted will send a resounding message to companies around the world that they cannot engage in such abuses to obtain commercial advantages in the U.S. market.

Exploitative business strategies like forced labor are directly against the interests of the public health and welfare, competitive conditions in the U.S. economy, U.S. production of like or directly competitive articles, and U.S. consumers. The ITC should not permit the U.S. shrimp market to be inundated with imports from an industry that allegedly fails to respect basic labor rights, in this instance the prohibition against the use of forced labor.

Letting bad actors go unchallenged will continue to hurt workers that face forced labor and other unethical practices. It also harms U.S. consumers that are unknowingly and unwillingly purchasing goods made with forced labor, and U.S. producers who now face a competitive disadvantage in domestic and international markets. For these reasons, we request that the ITC conducts an investigation into complaints made by Versaggi Shrimp Corp. and W&W Dock LLP.

Sincerely,

Babur Ilchi

/s/ Babur Ilchi