

Human Rights Impact Assessment

Farmed Shrimp in India

May 2023

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Executive Summary

About ELEVATE - an LRQA company



ELEVATE (an LRQA company) is the industry leader in sustainability and supply chain services worldwide, with business activities in over 100 countries.¹ The ELEVATE project team brings a combined 30+ years of relevant industry experience to this work and has conducted many engagements related to human rights in global agricultural supply chains. For this Human Rights Impact Assessment (HRIA), ELEVATE worked in conjunction with a consortium made up of The Kroger Co. (“Kroger”), Lidl GB (“Lidl”), and a third United States retailer with support from other subject matter experts to conduct research and site visits to frame the contents of this report.

Acknowledgments

The HRIA process could not have been completed without the time, effort, and expertise provided by all participating entities including the three retail partners, key experts, rightsholders, and other stakeholders that participated throughout the process. Kroger, Lidl, the third retailer, and ELEVATE (“the consortium”) would like to graciously thank all parties who contributed to this research and acknowledge the critical role they played in completing this work.

We also want to acknowledge and thank the suppliers who participated in this impact assessment and enabled third-party access to the sites, managers, and workers for site visits and interviews. The specific companies and farms involved remain confidential.

The consortium would also like to thank all the civil society organizations and supply chain actors that provided key background and insight into this industry and the broader human rights landscape.

Some parties’ identities within this HRIA remain confidential to ensure that experiences and information shared were expressed candidly. We expressed our appreciation to these anonymous contributors during interviews and want to acknowledge their valuable input here.

¹ <https://www.elevatelimited.com>

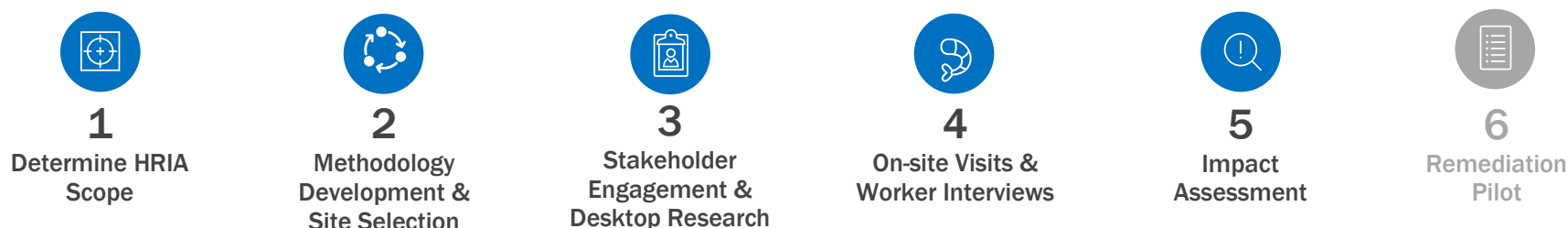
Methodology

This Human Rights Impact Assessment (HRIA) was designed and implemented in alignment with the United Nations Guiding Principles on Business and Human Rights (UNGPs)² and was informed by guidelines from Oxfam,³ The Danish Institute for Human Rights,⁴ and other HRIA leading practices. The HRIA methodology and process were designed to be gender-informed and further drew upon the Gender Dimensions of the Guiding Principles on Business and Human Rights.⁵ ⁶ These resources supported geography and product selection, stakeholder identification and engagement, report development, and remediation. The project team also engaged with Oxfam directly for input on the assessment methodology and development of the remediation plan.

Assessment approach

This project has been led by ELEVATE's team of human rights and aquaculture experts. The project team included a human rights lawyer and expert in global human rights investigations, senior-level advisers specialized in human rights and agriculture, and consultants with expertise in agriculture and supply chain investigations in Asia. The project team was also supported by a technical aquaculture lead. The field researchers were selected based on their local expertise in aquaculture and social compliance (see further details below). FishWise, a non-profit organization focused on aquaculture sustainability, served as an independent advisor throughout this project and supported the report review and remediation pilot phase.

The HRIA consisted of the steps outlined below. The remediation pilot, "Step 6," will follow the publication of this report. For more information see the Remediation Pilot section of this report.



² https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

³ <https://www.oxfamamerica.org/explore/issues/economic-well-being/private-sector-engagement/community-based-human-rights-impact-assessment-initiative>

⁴ <https://www.humanrights.dk/tools/human-rights-impact-assessment-guidance-toolbox>

⁵ Note: In this report, ELEVATE uses the gender-identifying language used by interviewees and other engaged parties. We recognize that there is a lack of research across the industry on the specific concerns of non-binary and transgender-identifying individuals. No workers identified as non-binary or transgender during interviews. Therefore, this demographic was not captured in this research.

⁶ <https://www.undp.org/publications/gender-dimensions-guiding-principles-business-and-human-rights>

Determining Scope and Focus

The retailers leading this HRIA have independent consulting relationships with ELEVATE. Each retailer expressed interest in identifying risks in shrimp production based on input from stakeholders, sourcing volumes, and independent risk analyses. All parties involved believe that pre-competitive collaboration and collective action is needed to address human rights risks in the global supply chain and advance positive impacts.

The selection of the focus area for this HRIA started with a review of the supply chain risk and sourcing practices of the consortium. Farmed shrimp is considered a high-risk product within the food and agriculture industry. Most related research has focused on Thailand and other countries in Southeast Asia. India is one of the world's largest producers of farmed shrimp, but little to no research has been conducted on human rights risks within the farmed shrimp industry in India specifically. As a result, the consortium selected farmed shrimp in India as the focus area for the HRIA to enhance industry knowledge on this product and country combination. Using the learnings from shrimp production in other geographies as a baseline, the consortium decided to include a remediation pilot in the program scope to respond to potential findings.

An additional review of key sourcing sites and volumes resulted in a focus on the state of Andhra Pradesh, where most of the processors and farms for the participating entities are located and where 24% of seafood exported from India is produced.⁷

Site Selection

The three retailers selected sites for in-person visits, which included on-site assessments, worker interviews, and anonymous surveys. ELEVATE facilitated the process to protect competitive information regarding specific suppliers and production facilities for each retailer.

The selection process for site selection consisted of the following steps:

- + Participants identified farmed shrimp sites in India.
- + The ELEVATE project team assessed the sites for any overlap.
- + After the initial shortlisting, the project team conducted a randomized pre-selection of sites situated in Andhra Pradesh, using a random number generator.
- + The team contacted the vendors to define each site's characteristics to ensure a diversity of sites for visits. This approach included consideration of vendor size, location, worker type, production type, worker gender and nationality, and a mix of processing sites and small and large farms in terms of employee numbers. Two pre-selected farms had completed their harvests before the site selection process; therefore, alternates were selected in their place.

The final list of sites selected included two processing sites with approximately 500 to 1,000 full-time employees each and nine farms with six to approximately 50 full-time employees. The researchers used the tools outlined below during the site visits to identify potential human rights concerns. All tools were deployed at each of the 11 sites.

⁷ <https://www.thehindu.com/news/national/andhra-pradesh/aps-seafood-exports-exceed-20k-crore-highest-in-country/article65583000.ece>

Finalize On-Site Tools and Site Visits

The site visits took place in November and December 2022. They were conducted by third-party researchers who were fluent in several of the regional languages identified on sites. The team included one male and one female researcher, both of whom were experienced in aquaculture, social compliance, and human rights. The male researcher independently visited sites that had only male-identifying workers. Both researchers visited processing sites, where both male and female workers were present (see Figure 1 below for the gender breakdown by type of site).

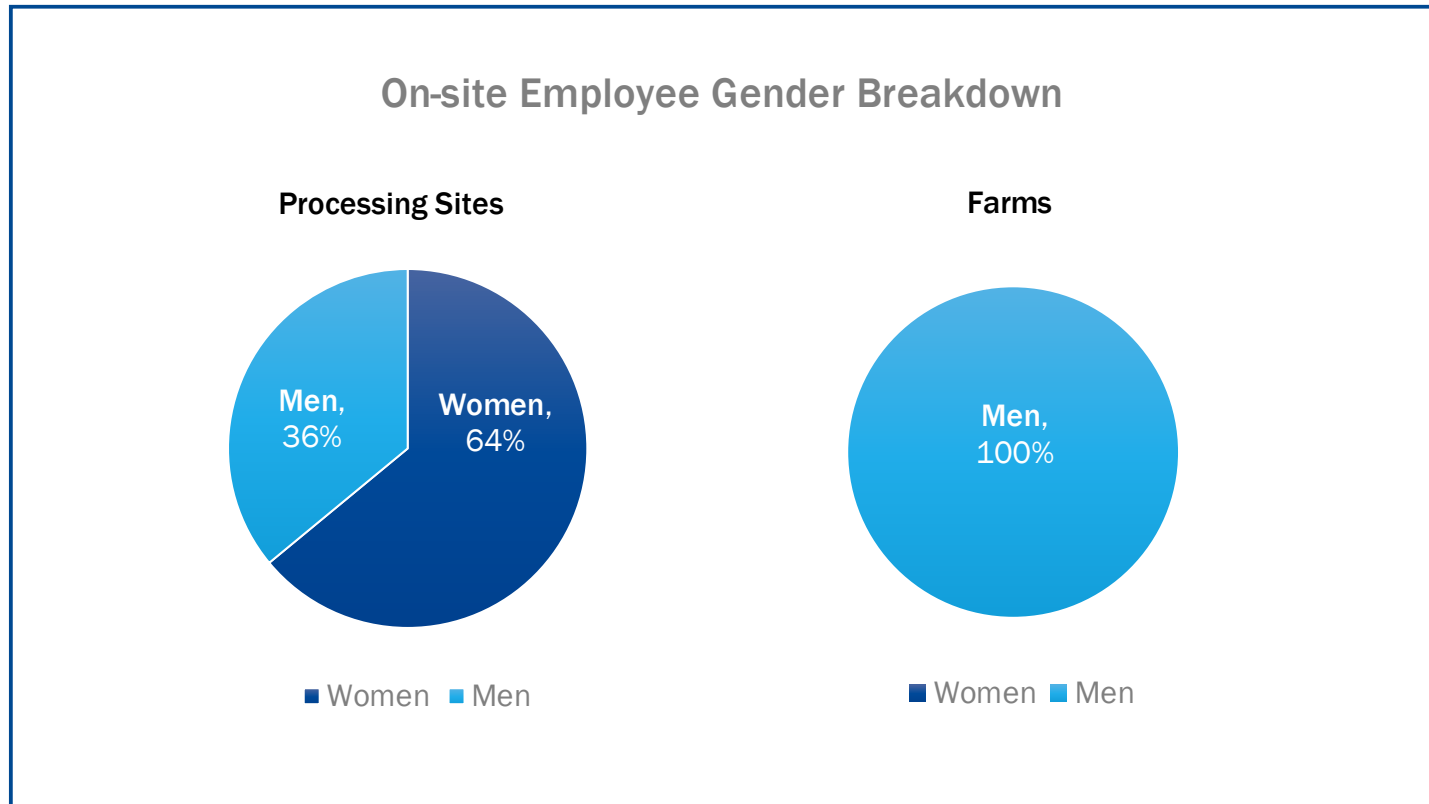


Figure 1

Four tools were used for each site visit to ensure as many findings as possible could be identified and captured, in addition to the desktop research and stakeholder engagement. See Figure 2 for the tools used during the research.

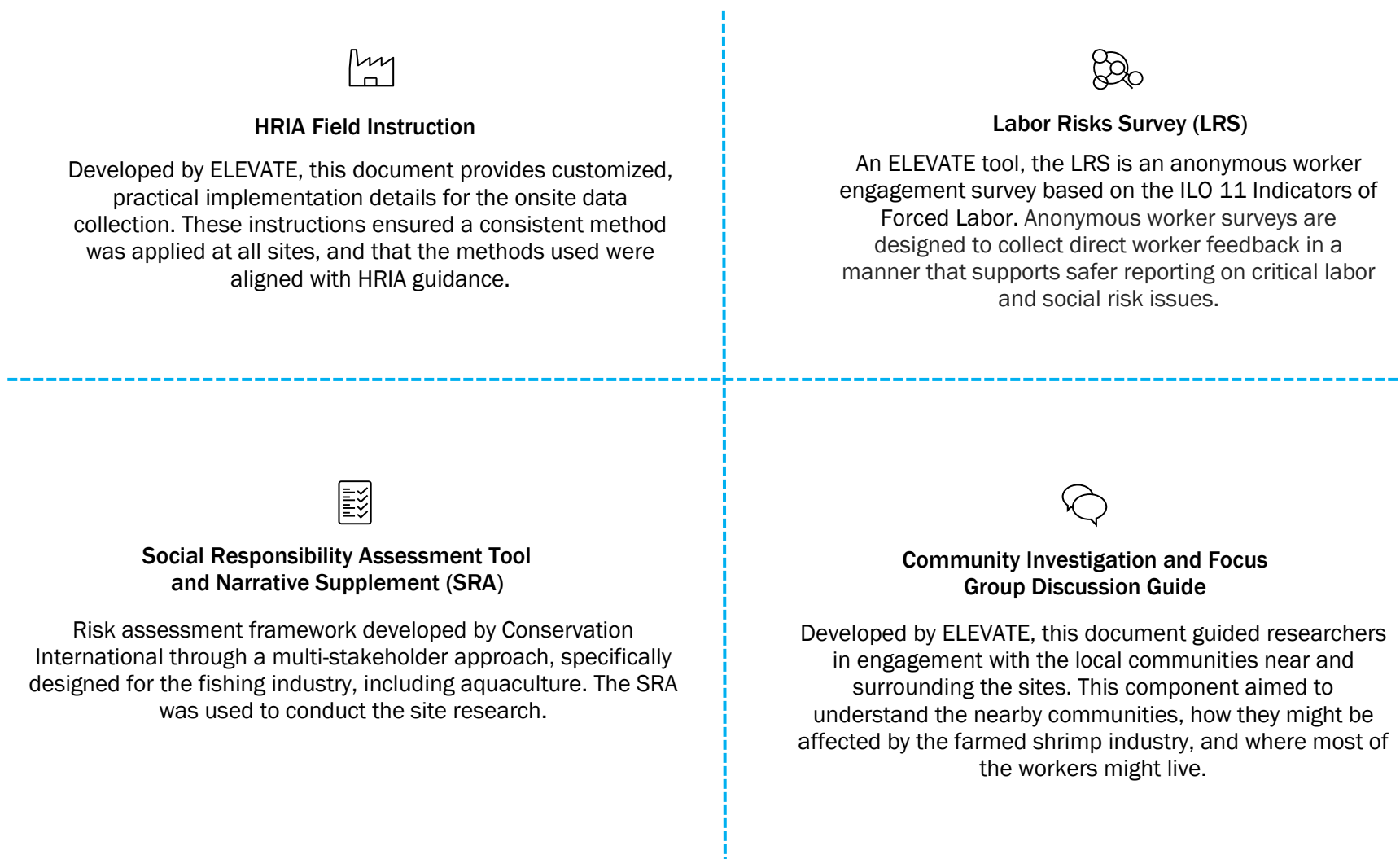


Figure 2

Worker Interviews

At each site, researchers sampled workers for the Labor Risk Survey (LRS) and Social Risk Assessment Tool (SRA) using the [SRA Assurance Guidance](#). Researchers surveyed at least 50% of employees present where there were fewer than 20 employees. For larger sites (more than 50 employees), 5% to 10% of the staff participated in interviews with the assessment team. As the farms were small, at some sites all workers present were interviewed. Researchers also conducted focus group discussions with groups of employees, separating men and women when multiple genders were present.

Attempts were made to include a diverse group of workers from each site, including those of different genders, from different regions, and who spoke different languages. See Figure 3 for a breakdown of on-site interviews performed by gender.

On-Site Data Collection

Researchers observed each site and noted findings using the impact assessment tools. After each site visit, the researchers informed site management about the HRIA process and how the findings would be used.

Community Investigations

For each of the site visits, researchers visited the nearest community to the farm or processing site to determine the site's impact on the surrounding area and identify potential organizations that could support impacted workers and/or community members. Researchers also conducted community stakeholder interviews where feasible, to capture additional information and understand community members' perspectives on the impact and risks of the shrimp farms and/or processing sites.

Stakeholder Engagement and Desktop Research

The project team identified and mapped a variety of stakeholders based on Oxfam's HRIA guidance. The project team conducted remote interviews with these stakeholders from November 2022 to January 2023. Attempts were made to interview all stakeholders from the list below, but trade union representatives in the region and government officials were not responsive. Instead, desktop research and other stakeholder interviews have been used to provide information on their perspectives. The team also conducted desktop research on the farmed shrimp industry and on the operational context in Andhra Pradesh to inform the interviews and on-site visits.

Additional stakeholder interviews with local agriculture officials took place in Andhra Pradesh during the site visits.

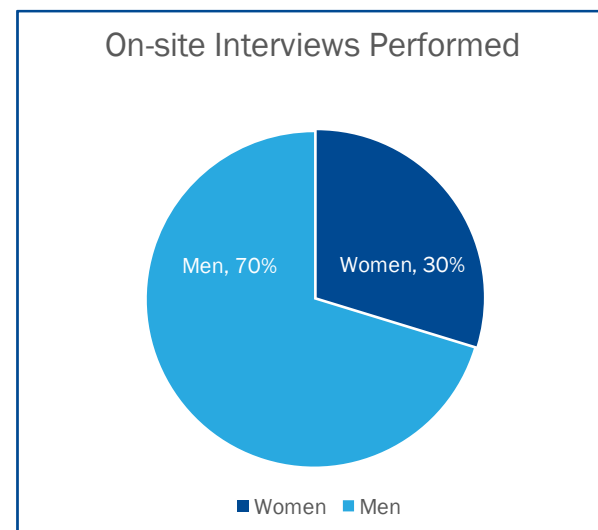


Figure 3

Stakeholder Categories	Identified Stakeholders
Business relationships linked to the impact (representative sample)	<ul style="list-style-type: none"> + FishWise + Shrimp Insights + Anonymous vendor
Farmers in focus supply chain, small-holder farmers, or farmer cooperatives (if relevant)	<ul style="list-style-type: none"> + Workers interviewed during site visits + Anonymized workers who participated in surveys (Labor Risk Surveys) during site visits
Workers	<ul style="list-style-type: none"> + Workers interviewed during site visits + Anonymized workers who participated in surveys (Labor Risk Surveys) during site visits
Workers associations, trade unions	<ul style="list-style-type: none"> + Confederation of Free Trade Unions of India
Affected communities including minority/vulnerable groups	<ul style="list-style-type: none"> + Workers interviewed during site visits + Community visits near sites during research phase
Civil society organizations, women's rights organizations, indigenous groups, religious leaders, and/or relevant religious organizations	<ul style="list-style-type: none"> + World Wildlife Fund + Global Seafood Alliance + Monterey Bay Aquarium Seafood Watch + Sustainable Fisheries Partnership + Humanity United + Freedom Fund
Government representatives from the relevant ministries (home and host country), local and regional authorities, labor inspections, traditional leaders	<ul style="list-style-type: none"> + Andhra Pradesh local government officials related to agriculture + Marine Products Export Development Authority (MPEDA)
Company representatives from different departments	<ul style="list-style-type: none"> + Relevant retailer teams (e.g., Buying / Sourcing, Merchandising, etc.).

Assessing Saliency of Identified Human Rights Issues

The project team collated and analyzed the findings from the site visits and related tools, stakeholder engagement, and desktop research. The team then determined the severity and likelihood of each human rights issue identified to understand the saliency, in alignment with the UNGPs:

SEVERITY is based on how **grave** and **widespread** the impact would be on people (not on the business) and how **difficult it would be to put right** the resulting harm. This has been identified in the overview of the findings.

This definition combines:

- + Scale of the impact (seriousness to rights)
- + Scope (number of people impacted)
- + Remediability (whether the impact can be reversed and how quickly)

SALIENCY

LIKELIHOOD of issues considers the **potential for the issue to occur in the future**, recognizing that these are often, though not limited to, impacts that have occurred in the past.

Determining likelihood is based on:

- + Operating context (the geography, area and associated potential impact on human rights)
- + Business relationship (relationship with e.g., supplier, and connection to the issue through the value chain)

The findings from the site visits (including the community and worker engagements) informed this process and helped to indicate the potential of the risk occurring across the industry (i.e., the potential likelihood). They were triangulated with, and supported by, stakeholder engagement and desktop research.

The Research Findings & Recommendations section includes an overview of each finding, the saliency of the issue, and recommendations for remediation or mitigation.

Safety Measures & Protocols

The following safety measures were taken to ensure that the HRIA research was conducted safely, responsibly, and effectively:

- + All HRIA visits were announced to site management.
- + ELEVATE's project team was in close contact with the on-site research team using WhatsApp to monitor safety while conducting visits.
- + Worker confidentiality was strictly enforced through processes and procedures by the research team. Steps to address worker confidentiality include ensuring throughout the process no worker names were collected and sites remain anonymous in this report.
- + Workers were briefed on non-retaliation policies and were provided with contact information should they have anything they wanted to report immediately.

- + Researchers verbally shared an informed consent statement and purpose of the research with everyone interviewed.
- + Interviews took place in private locations.
- + Female workers were only interviewed by the female researcher.
- + Worker communication and interviews took place in the workers' preferred regional languages, in this case, Telugu or Odia.
- + Photos were limited to the farm or processing site premises.
- + No photos were taken without prior permission from the site and individuals were not included in any of the photos.

Limitations

The assessment sought to include as much diversity across the Andhra Pradesh region as possible, although it was limited to processing sites and farms. Stakeholder interviews suggested that farmed shrimp are brought to Andhra Pradesh from other regions to be processed. Traceability is also found to be challenging in the feed supply chain because of chain of custody visibility and production process documentation is limited.⁸ Risks from other regions and the feed supply chain were not addressed in this research and are not addressed in the remediation pilot.

Researchers spent two days at each site and community, which limited the number of interviews they were able to conduct, particularly with community members. Researchers had a limited timeframe to visit sites to ensure they could be present at harvest. However, this also meant that researchers did not visit sites during other times of the year, such as feeding or post-harvest cleaning, when other activities occur on the sites, which, in some cases, are performed by different workers. During the visits, interviews were only possible with workers who were on site. Therefore, contracted workers for feed and other aspects of shrimp farming were not interviewed. Researchers did not visit sites outside of working hours due to standard practices on researcher safety protocols.

While researchers fluently spoke the local languages, the quick nature of the engagement with workers may have limited workers' willingness to share information. Likewise, strict precautions were taken to protect workers' confidentiality during interviews, but workers may have been concerned about repercussions from management once anonymized report findings were shared.

⁸ Stakeholder Interviews.

Context & Industry Landscape Review

Farmed Shrimp Supply Chain

Over the last few decades, shrimp's popularity for consumption has demand for shrimp production has increased substantially. This demand has been met with increased production efficiency and new technology.

Both the market value of shrimp and quantity available on the market have substantially increased with crustacean⁹ exports increasing from \$1.2 billion USD in 1976 to \$24.7 billion USD in 2020.¹⁰

The COVID-19 pandemic affected the shrimp market and supply chain. Throughout the pandemic, shrimp exports decreased due to the closure of the hospitality industry. However, since 2020 demand for shrimp has rebounded and remains at a steady positive rate.¹¹

Farmed shrimp accounts for 55% of the shrimp produced globally.¹² The primary species produced is the whiteleg shrimp (*Penaeus vannamei*) of which 5.8 million tons was produced in 2020 alone.¹³

India is the largest farmed shrimp exporter to the U.S., accounting for 41% of all shrimp imported into the U.S. in 2019.¹⁴

India also exports farmed shrimp to the European Union, which in 2021 globally imported 829,300 metric tons of farmed shrimp. India is one of the top exporters of the United Kingdom, Northern Ireland, and the Russian Federation.¹⁵ Other key markets for Indian farmed shrimp include China and Japan.¹⁶ The Andhra Pradesh region produced approximately 24% of seafood exported from India and 35% of the total value of

⁹ Crustaceans include shrimps and prawns.

¹⁰ <https://www.fao.org/3/cc0461en/cc0461en.pdf>

¹¹ <https://www.fao.org/3/cc0461en/cc0461en.pdf>

¹² <https://www.worldwildlife.org/industries/farmed-shrimp>

¹³ <https://www.fao.org/3/cc0461en/cc0461en.pdf>

¹⁴ <https://www.seafoodwatch.org/our-projects/farmed-shrimp-in-india>

¹⁵ <https://www.fao.org/3/cc1350en/cc1350en.pdf>

¹⁶ <https://www.fao.org/3/cc1350en/cc1350en.pdf>

seafood exported globally from 2021-2022.¹⁷ India has significant competition from other countries in Southeast Asia (Vietnam, Indonesia, and Thailand) and South America (Ecuador, Honduras, and Argentina). Globally, Ecuador is the largest exporter of farmed shrimp.¹⁸

India's shrimp industry is regulated by several government agencies. The Marine Products Export Development Authority (MPEDA), established under the Marine Products Export Development Authority Act 1972, (No 13 of 1972) by the Government of India, promotes industry development. Agricultural and Process Food Products Export Development Authority (APEDA) offices control land use permits and regulate pollution.

The rise of other countries producing farmed shrimp has affected the Andhra Pradesh market, resulting in lost income for farmers and workers, and lower demand has resulted in shrimp stocks being destroyed. The Indian Government formed a High Power Committee that required payment to farmers for shrimp already produced, but traders were reportedly paying below the Committees' required amounts.¹⁹ The region has also experienced challenges due to chemical usage and gas leakages in several sites.²⁰

Supply Chain Context

Figure 4 is an example of a standard farmed shrimp supply chain. This incorporates findings from external stakeholder interviews as well as each retailer's supply chain. The supply chain mapping has been used to inform the findings and recommendations.

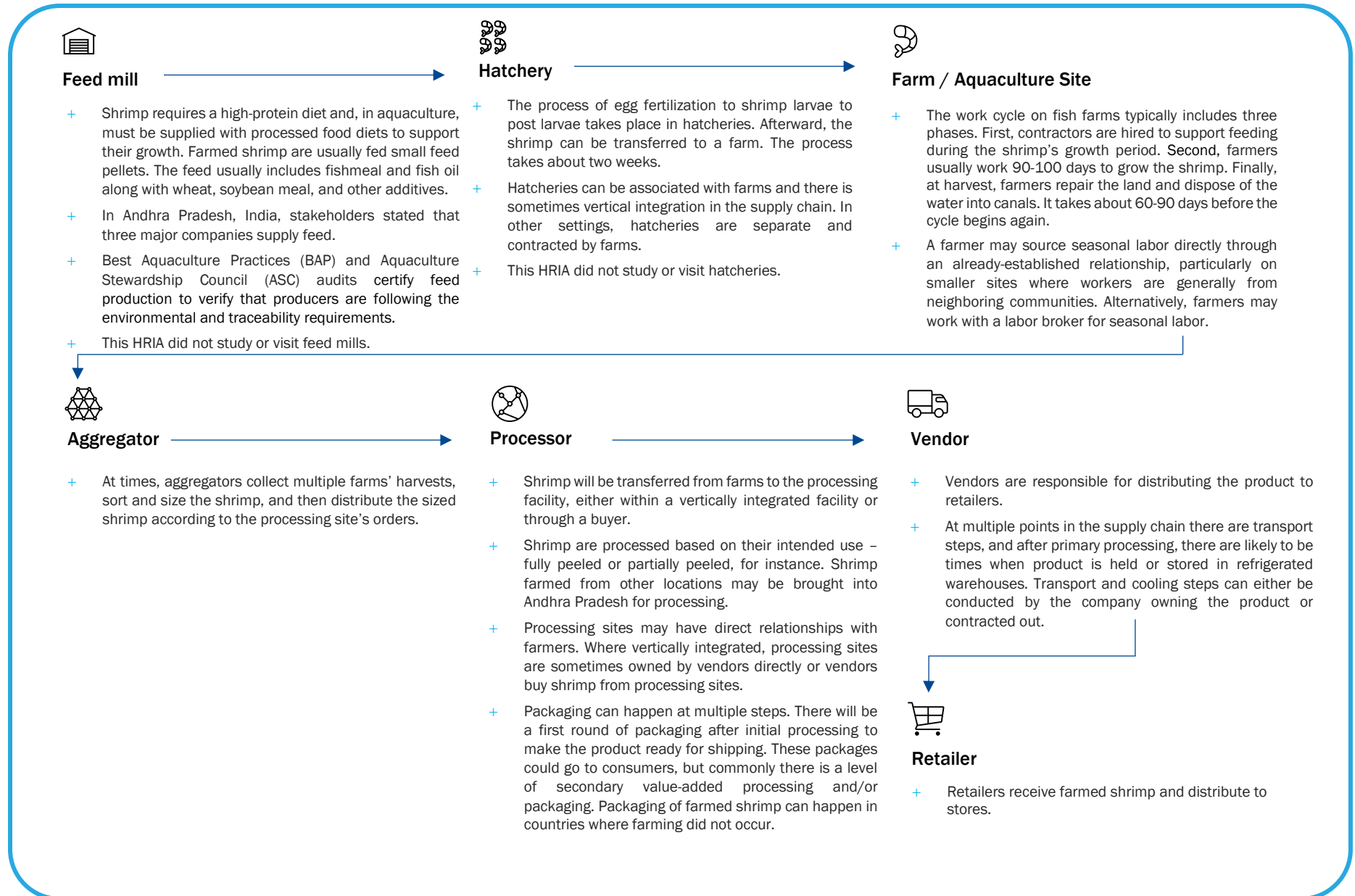
¹⁷ <https://www.thehindu.com/news/national/andhra-pradesh/aps-seafood-exports-exceed-20k-crore-highest-in-country/article65583000.ece>

¹⁸ <https://www.fao.org/3/cc1350en/cc1350en.pdf>

¹⁹ <https://aquaasiapac.com/2022/11/19/shrimp-farmers-in-andhra-pradesh-distressed-by-declines-in-shrimp-prices/#:~:text=In%20a%20review%20on%20shrimp%20farming%20in%20India%2C,producing%20around%20634%2C000%20tonnes%20of%20shrimp%20every%20year>

²⁰ Findings from site visit interviews.

Farmed Shrimp Supply Chain



Additional Supply Chain Considerations

Farm and Processing Relationships

Some processing plants have agreements with independent farms to purchase all of a farm's harvested shrimp. This partnership benefits farms, which have guaranteed buyers, but it also may result in farms relying heavily on processing sites for their sales and pricing. In some cases, farms are directly owned by the processing sites, although, according to stakeholders interviewed, vertical integration²¹ does not always include farms. In other cases, smallholders produce shrimp but then are left with extra product or are unable to pay for shrimp production when processing sites do not agree to buy the full pond or market demand for shrimp changes.

If a farm is not vertically integrated, there may be an aggregator that works in between the farm and the processor. The aggregator can be a large farm that works with many smallholders to harvest and sell the shrimp through contracts with a processing facility. Alternatively, the aggregator may be a dealer that brings the shrimp to a depot where it is sized before processing. These dealers may have the first right of refusal to a harvest through pre-financing production. Refusal may occur from the farm if a dealer will not pay the harvest's market value or from the dealer if the harvest quality is not up to expectation. In either scenario, the farmer will pay the pre-financing back per the agreement.²²

Responsible Sourcing Practices in the Industry

Tools such as environmental certifications and audits are common in the industry. The certifications invested in by the Indian farmed shrimp industry are primarily focused on environment and traceability, rather than social or human rights risks. The most-used certifications in farmed shrimp in India are:

Best Aquaculture Practices (BAP)

A third-party aquaculture certification that can span the entire farmed shrimp production chain from processing plant to farm, hatchery, and feed mill. The certification primarily addresses environmental risk and includes limited indicators of social, food safety, and animal health and welfare. BAP uses a star (1 through 4) rating system to demonstrate the level of certification, e.g., BAP 1-star indicates the processing plant is certified and BAP 4-stars indicate farm, processor, hatchery, and feed mills are BAP certified.)

Aquaculture Stewardship Council (ASC)

Standards for responsible aquaculture addressing farming's impact topics like biodiversity, pollution, and workers' rights while including areas such as feed, diseases, and antibiotics.

²¹ Noted: Vertical integration is when multiple processes across the supply chain are owned or managed by a single company. These processes can range from production to processing, transportation, and direct sales on the market.

²² Stakeholder interviews.

Certification can occur on a farm-by-farm basis. During the past five to 10 years, more farms have begun to participate in certifications²³, oftentimes with a processing plant if vertically integrated and representing a larger operation. Participating in certification schemes can be resource-intensive, which can be prohibitive for smaller farms and may hinder their ability to participate in the export industry.²⁴

Human Rights Context in India

National Law

India's Constitution guarantees workers certain fundamental rights and bans discrimination based on religion, sex, or caste. The "Directive Principles of State Policy" set expectations for Indian states that they make individual laws or policies including human rights expectations like livelihood, material resources, abuse prevention, and gender equality. However, these principles are not enforceable by courts.²⁵ Indian law provides several social protections for workers, including state insurance which covers health care, maternity leave benefits, and social security benefits. As of recently, domestic migrant workers can receive social security benefits regardless of which state they work in.

India approved the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act in 2013 and it was incorporated into Andhra Pradesh's law in the same year. The International Labor Organization subsequently developed a guide to implementing the Act. The Act specifies that employers must provide a safe working environment, offer information about grievance handling mechanisms and consequences of sexual harassment, and organize workshops and prevention programs.

Human Rights Conventions

India has not ratified several international human rights treaties and conventions including those related to the ILO Fundamental Principles and Rights at Work such as the Freedom of Association and Protection of the Right to Organize, 1948 (No. 87), the Right to Organize and Collective Bargaining Convention, 2020 (No. 98), and the Violence and Harassment Convention, 2019 (No. 190).

Key Human Rights Challenges in India

While India has officially abolished the caste system, it remains prevalent, particularly in rural areas, and results in historically excluded groups continuing to lack resources, access to education, employment, and other services.²⁶

→ The United Nations India office highlighted that forced and bonded labor continues to be prevalent in India and that protections to prevent human trafficking require strengthening.²⁷ Reports of labor trafficking are prevalent in India, with the National Human Rights Council recommending additional resources and training.²⁸

²³ Stakeholder Interviews.

²⁴ Stakeholder Interviews.

²⁵ <https://iclg.com/practice-areas/employment-and-labour-laws-and-regulations/india>

²⁶ United Nations, A/HRC/WG.6/41/IND/2

²⁷ United Nations, A/HRC/WG.6/41/IND/2

²⁸ United Nations, A/HRC/WG.6/41/IND/3 Summary of Stakeholders' submissions on India 7–18 November 2022

- Violence against women and girls remains a major issue in India.²⁹ Reporting gender-based violence is stigmatized and women are underrepresented in the workforce. Sexual harassment continues with impunity due to a lack of legal enforcement and protection.³⁰ One stop centers are state-provided resources for women survivors of violence and abuse but are not always accessible.³¹
- India does have laws and regulations which protect LGBTQ+ and gender non-conforming persons' rights, however, these populations reportedly still face discrimination throughout the country, particularly in rural communities.³²

Sourcing Policies

Kroger's Sourcing Policies & Practices

Kroger is committed to sourcing products responsibly and in alignment with accepted best practices. The company manages the topic of human rights under its comprehensive Environmental, Social & Governance (ESG) strategy: *Thriving Together*.

The company's management approach to responsible sourcing and supply chain accountability is outlined in its [2022 ESG Report](#) and supporting documents, including its Responsible Sourcing Framework, Vendor Code of Conduct, Human Rights Policy, and other policies and programs relevant to vendors and suppliers. These and other resources are available at the company's [ESG Hub](#).

In 2021, Kroger committed to aligning its approach with the UN Guiding Principles (UNGP) on Business and Human Rights and initiated a two-year plan to assess and improve its human rights practice and reporting. Additional efforts include identifying the most salient human rights risks and conducting human rights impact assessments.

Primary responsibility for sourcing raw materials, ingredients, and finished food and consumer goods for retail sale (including seafood products and farmed shrimp) is shared among Kroger's Sourcing and Merchandising teams. Purchasing practices and contract terms require vendors to agree to the [Kroger Vendor Code of Conduct](#) as a requirement for doing business with Kroger.³³

Kroger has worked with the World Wildlife Fund (WWF) since 2009 to develop its approach to advancing more responsible and sustainable seafood production globally. In 2020, Kroger and WWF co-published a [Seafood Sustainability Report](#) that outlines the retailer's sustainable seafood commitments and progress to date. Additional details are available in Kroger's [Seafood Sustainability Policy](#) and [2022 ESG Report](#).

²⁹ United Nations, A/HRC/WG.6/41/IND/2

³⁰ United Nations, A/HRC/WG.6/41/IND/2

³¹ United Nations, A/HRC/WG.6/41/IND/2

³² United Nations, A/HRC/WG.6/41/IND/2

³³ <https://www.thekrogerco.com/newsroom/statements-policies>

Lidl's Sourcing Policies & Practices

Lidl takes a human rights due diligence approach to protecting workers throughout its global supply chain. Lidl systematically monitors and assesses the potential and actual risk of human rights violations and environmental impacts in the supply chain, outlined in the [Human Rights in the Supply Chain Policy and Human Rights & Environmental Due Diligence Policy](#).

This topic is managed by the CSR-Buying team that sits within the wider Purchasing department. All Lidl suppliers are expected to comply with Lidl's [Code of Conduct](#), which is included as part of all commercial contracts. Lidl has committed to conducting three HRIAs a year, until 2025.

For over ten years Lidl has been working with suppliers and wider industry partners to set an approach to responsible fish and seafood sourcing. Lidl has an overarching long-term commitment to 100% fresh and frozen fish and seafood (own brand) to be sourced from sustainable fisheries or responsibly managed farms, outlined in Lidl's [Sustainable Fish and Seafood Policy](#).

Lidl primarily works with the certification schemes Marine Stewardship Council (MSC), Global GAP, Best Aquaculture Practices (BAP), the Aquaculture Stewardship Council (ASC), and is a member of the Sustainable Seafood Coalition. Lidl has the following commitments focused on farmed species, including shrimp:

- + 100% of own-brand chilled, frozen farmed species, as well as farmed species used as an ingredient in other products, must be sourced from BAP 2-star, Global Gap, or ASC certified sources.
- + All suppliers of own brand chilled and frozen farmed species should be working towards BAP 4-star (or equivalent).

Lidl GB is committed to supply chain transparency and has partnered with [The Ocean Disclosure Project](#) to share sourcing locations and certifications of all farmed and wild-caught fish and seafood products on an annual basis.

In 2022, Lidl GB signed up to [WWF's Retailers' Commitment for Nature](#), with the target to halve the environmental impact of UK baskets by 2030. One of the seven topic areas is focused on 'marine', working towards sourcing seafood from sustainable sources by 2030.

Research Findings & Recommendations

Research Findings and Recommendations

The below table outlines the HRIA findings as well as the saliency of each issue (see Methodology for more information). All findings were identified during the farm and processing site visits which included observation, worker and community interviews, and anonymous worker surveys. The site visits were contextualized by findings from desktop research and stakeholder engagement.

The findings from this HRIA have informed the industry-wide recommendations for all parts of the value chain. This HRIA also includes a remediation pilot project to respond to some of the HRIA findings directly. Reporting on the impact of the remediation pilot and lessons learned will be provided in an appendix report following the conclusion of the pilot.

Extreme Saliency



High Saliency






Impacted Rights	Findings	Saliency
Ability to Leave³⁴	<p>Workers' inability to leave sites or have full freedom of movement was reported as a concern in the farmed shrimp industry in India and elsewhere.</p> <ul style="list-style-type: none"> + There was some evidence that workers may have been unable to leave the sites, including dormitories, during off-hours. + At some sites, security guards were present at the facility and were reported to be there 24 hours a day, seven days a week. 	
Forced or coerced overtime work without compensation³⁵	<p>Overtime is reportedly common in this industry and many workers work up to 80 hours per week, which exceeds the local maximum of 60 hours per week. Sites are required to keep accurate timesheets and compensate for overtime hours with double wages according to local laws.</p> <ul style="list-style-type: none"> + During site visits, workers who stayed in the dorms, often domestic migrant workers from Odisha State, were found to be working more hours than the limit or what was reported in management records. In some cases, workers reported that workdays were typically 12 hours long, from 6 a.m. to 6 p.m., without overtime wages. + There is evidence of forced overtime without compensation and indications of falsified records of workers' hours. In some cases, workers reported being disciplined if they refused overtime work. In other instances, workers reported working every day, a violation of the required day off after six days of working per the ILO. + Timesheets were found to be inaccurate with no indication of overtime.³⁶ Stakeholder interviews confirmed that many sites are aware of the legal requirements but may hide certain practices to evade detection and maintain high production levels. 	
Recruitment Fees	It is often customary for workers to pay recruiting fees to get a job in this industry, according to stakeholders.	

³⁴ This can be an indicator of forced labor as per the 11 indicators of forced labor by the ILO.

³⁵ Forced overtime and overtime without compensation can be a potential indicator of forced labor, per ILO.

³⁶ In some sites, workers suggested that their timecards are not actually used and only exist for audit purposes. In other locations, the timecards presented were signed and information appeared in English, although workers at the site did not speak English and many could not read or write in local languages either.

Impacted Rights	Findings	Saliency
Health and Safety	<p>+ Some workers reported paying fees to get their jobs, and some workers reported borrowing money from the site or labor agent to pay recruitment fees, presenting a risk of debt bondage.^{37 38}</p> <p>Workplaces may fail to provide proper personal protective equipment (PPE) and safety training to workers or fail to provide training in a language that workers understand.</p> <p>+ Health and safety issues noted in site visits included a lack of proper PPE, lack of health and safety training on using equipment, and a lack of instructions on workplace safety except in writing in Telugu and English, placing workers without literacy or who spoke other languages at greater physical risk.</p> <p>+ Workers who are on short-term contracts to provide feeding during the production process reported not receiving training or having access to safety equipment.</p>	
Gender Discrimination	<p>Industry hiring practices in farmed shrimp production reportedly reflect traditional gender roles. Farms typically only hire men, and small processing sites hire primarily women. This division may be related to cultural norms and long-standing labor practices in India. Larger processing facilities typically employ both men and women, but male workers are more likely to be present at processing sites during overnight shifts. Shrimp farms are often located in small, remote villages, where cultural restrictions may limit opportunities for women to work outside of the home. In some instances, women are hired to work as cooks on farms; in these cases, they are often hired and paid directly by an all-male workforce, and their work appears to be unregulated by farm management.</p> <p>+ Workers report that the Marine Products Export Authority (MPEDA) does not certify women to work on farms. However, this was not confirmed by MPEDA. Due to this perception, women may not consider applying for farm jobs.</p> <p>+ Workers of all genders reported equal compensation across job types. Women reported experiencing an increase in economic opportunities due to the farmed shrimp industry.</p>	
Sexual Harassment	<p>Sexual harassment and abuse are reportedly prevalent in the region and across the industry, particularly for domestic migrant workers from other states who report unwelcome sexual remarks or physical contact more frequently. Physical safety issues³⁹, including abusive working conditions, reportedly occur more often at processing sites, where the workforce predominantly consists of women.⁴⁰</p> <p>+ There were reports of physical violence and sexual harassment at sites visited, and some workers reported feeling unsafe, specifically in the dormitories.</p>	
Discrimination based on Ethnicity / Language / Other⁴¹ ⁴²	<p>Research indicates that domestic migrant workers may experience various forms of discrimination or disparate outcomes, including forced overtime. Some sites visited included domestic migrants, typically from Odisha State, in addition to the workforce from Andhra Pradesh. Workers are either recruited in Odisha or travel to Andhra Pradesh to find jobs in the shrimp industry. These</p>	

³⁷ Debt bondage can be a potential indicator of forced labor per the ILO.

³⁸ More investigation may be needed to understand the use and practices of labor recruiters at farm and processing sites.

³⁹ According to interviews, the physical safety of workers is an ongoing concern in feed production. This HRIA did not visit feed production sites nor trace feed production, though worker safety is a known human rights concern for the industry.



⁴⁰ Note: Abusive working conditions include reports related to physical, mental, emotional, and sexual abuse.

⁴¹ Use of foreign migrant workers in the industry is uncommon.

⁴² This assessment did not result in any findings on caste discrimination. However, caste may impact the workers before being hired. For example, there are reports about recruitment and advertisements targeting specific castes, but this was not included in this study.

Impacted Rights	Findings	Saliency
	<p>workers typically speak Odia language instead of the majority local language, Telugu, which can limit their access to information concerning their employment conditions and rights, including working hours, as well as safety warnings.</p> <ul style="list-style-type: none"> + Workers from Odisha are also more likely to live in dormitories located on or near sites because they are arriving from farther away and are not able to return to nearby homes each night. They may be less likely to be able to refuse overtime work, heightening the risk of forced labor for domestic migrant workers. + Away from worksites, there are instances of discrimination against workers from Odisha in villages. In some cases, workers reported being harassed and experiencing discrimination in local markets, which requires them to buy food elsewhere. + There were reports of age discrimination during site visits. Some reported that older workers are not hired on sites. 	●
Wages & Benefits	<p>Lack of wage transparency is reportedly a common issue in the industry. Workers may not receive wage slips, wage slips may not comply with legal requirements, or wages do not include overtime worked. Management records may be inaccurate or fabricated, with workers reporting being paid less than records show, to comply with audit requirements.</p> <ul style="list-style-type: none"> + In some locations, workers did not receive the required benefits and deductions from their salaries. In other locations, workers were not aware that they should receive social security benefits. + Workers reported paid time off is not provided, although some workers were informed during recruitment they would receive half of their salaries during days off.⁴³ 	●
Living Conditions on Site	<p>On shrimp farms, many workers live in dormitories because transportation in the area is limited, and farms are often in remote locations. Processing facilities are typically located near a village, so fewer workers live in dorms.</p> <ul style="list-style-type: none"> + In some locations, dorms visited were in poor condition. + Workers appeared to use the dorms as their canteen for meals as well. 	●
Contract Workers	<p>Use of contract workers in the industry is reportedly common, particularly in processing facilities. On farms, contract workers who conduct feeding are usually present on sites before harvesting starts. They are hired by farms to visit every six months after the harvest to support preparations for the subsequent harvest season and work on other farms in between. Some contract workers are from the local region, while there were reports of others traveling from as far as West Bengal, India.</p> <ul style="list-style-type: none"> + Desktop research identified that workers sometimes arrive for evening shifts. During site visits at both farms and processing sites, these workers did not appear on any timesheets, payrolls, or other documentation, and their presence was not confirmed by researchers. If the sites hire evening workers, the findings may indicate that these workers do not have employment contracts or other social protections, such as designated breaks or times for meals. + While contract workers are expected to be registered with MPEDA, researchers were unable to verify this, or other documentation related to their contracts. 	●
Access to Grievance Mechanisms	<p>In this industry, some sites reportedly had policies for providing grievance mechanisms, but these mechanisms may not be active or used by workers. In some cases, there may be no operational grievance mechanisms at all.</p> <ul style="list-style-type: none"> + At some sites, workers were not aware that a grievance mechanism was available for use, at other sites, a grievance mechanism was not available. + Workers in India officially have access to MPEDA, which provides governmental grievance mechanisms. 	●

⁴³ In Andhra Pradesh, workers are eligible for earned leave (paid time off) after 240 days of employment. This excludes most workers on farms and processing sites,

Impacted Rights	Findings	Saliency
	<ul style="list-style-type: none"> + There are also some instances where workers raised concerns to auditors or the Labor Department of the regional government. 	
Document Retention⁴⁴	<p>Documents such as passports, IDs, and other forms of identification and personal documents may be retained by employers in the industry.</p> <ul style="list-style-type: none"> + Workers reported that in some cases, their personal documentation was retained by labor agents or by employers. However, workers reported that they were able to get documents back whenever they needed them, in almost all cases. 	
Access to Freedom of Association and Collective Bargaining	<p>In India, if sites employ more than 100 workers, they are legally required to have active worker committees and internal complaint committees (ICC) that help to collectively raise specific workplace challenges. Worker committees include representatives elected by workers and are to meet every three months.</p> <ul style="list-style-type: none"> + Workers are aware of trade unions and their legal right to exist, but they did not seem to be active consistently across the locations visited. In some sites, committees were found to be active. In others, the committees were not active, but workers reported that minutes were still being recorded only for auditing purposes. 	

Other considerations



Overall Site Visit Transparency

The researchers visiting the sites experienced several challenges that may impact the overall findings. These included a lack of transparency from some of the sites visited. All site visits were announced in advance and scheduled with management, but some management attempted to limit researchers from visiting some areas of the site. There were also discrepancies in the reported number of workers on sites and the size of one site, which may indicate that the researchers were not shown all parts of the site.

At other sites, the researchers identified discrepancies between what workers shared in their interviews and what documentation presented by management revealed. In one instance, the information in the documentation was not reflective of actual production figures that were observed on-site. Researchers also found several discrepancies in reported hours worked and aspects of labor rights such as worker committee activities and other issues surrounding worker treatment.

Some of these discrepancies and the lack of transparency led researchers to ascertain that workers were coached on what to disclose in the interviews. According to stakeholders, this happens with some regularity in the industry. Although there is no proof of coaching or falsified documents during this research, coaching and limiting access on sites both violate standard protocols and retailer policies.

The researchers attempted to speak with community members, but in some locations, there was fear or skepticism of the researchers. In some smaller villages, women were not willing to leave their homes and speak with the researchers, despite having a woman researcher conduct the visit in the local languages.

⁴⁴ Inability to retain and access personal documentation and identification documentation can be a potential forced labor indicator per the ILO.



Climate Change

Future impacts of climate change such as extreme heat and flooding may impact workers in the farmed shrimp industry. On-site assessments revealed that there was some flooding in the past several years and that with extremely heavy rains, product was destroyed. In the future, this may affect the livelihoods of the workers, especially farmers and farm owners who could lose their income if they have no guaranteed sales. The towns' reliance on the industry places them at risk financially should climate change impacts limit their only source of income generation. Local officials and stakeholders expressed some concern about the farmed shrimp industry's impact on mangroves and deforestation. At the time of the assessment, the region did not employ satellite technology or other tools to monitor and mitigate environmental impacts.



Access to Social Services, including Health and Education

In the region, there are very few, if any, community organizations to support social services, and no civil society organizations were identified in the communities. Any services, such as transport, healthcare, and education come from the government or are supported by the employer.

Challenges reported in villages include domestic violence and limited transportation. One processing site provides transportation to help community members get to work but there is no transport elsewhere or outside of the village. In some instances, aquaculture employers support healthcare facilities. Health resources observed ranged from hospitals and healthcare within three kilometers of sites to having only basic first aid available in more remote villages, mostly determined by the size of the site. In some locations, employers help to support the education of workers' children and there are secondary schools and colleges in the town. In other locations, only primary schools were present. It was found that children did consistently attend schools in the locations, though the quality of education varied.



Impact on Livelihoods and Local Communities

There are reports of the positive impact of the sector on local communities and livelihoods, including for women. Workers reported having more stable incomes and were able to acquire better food because of their earnings. In some cases, workers had to leave their towns to find work before the farmed shrimp industry entered the town. Community members stated that low-income households benefitted from engaging in aquaculture activities, irrespective of the scale of the operation.



Other issues

There may be other human rights risks associated with the seafood industry which are not included in the above. All issues have been informed by desktop research, stakeholder interviews, or site visits.

Industry-wide recommendations

The table below addresses industry-wide recommendations that correspond to the findings above. Recommendations are organized by which supply chain actor would be responsible to act. Retailers will use these recommendations to inform the development of their HRIA action plans.


The HRIA also included the development of site-specific recommendations for the retailers to include in their responsible sourcing programs and site-specific actions. This report focuses only on the industry-wide aggregate remediation measures related to the overall findings. These recommendations also helped to inform the second component of this HRIA: a remediation pilot, for which the participants considered a focused opportunity for collaborative remediation as a direct result of the HRIA findings.

Relationship to Impact

The impact assessment included a review of the linkage that the retailers have to the impact, considering their potential leverage to prevent, mitigate, and respond to the impact in alignment with the UNGPs. All the above human rights impacts have been identified at the farm and/or processing facility level. At this level of the supply chain, retailers will typically not have a direct linkage to the findings. However, as major supply chain actors, retailers have the leverage and the responsibility to ensure policies outline clear expectations, proper due diligence is undertaken, and purchasing practices are not inadvertently creating or contributing to human rights impacts.



Retailers can use their influence to encourage vendors and other upstream supply chain actors, i.e., farms, processing facilities, aggregators etc., to implement the recommendations below.

Supply Chain Actor	Opportunities for mitigation or remediation
 <p>Industry Collaboration</p>	+ Establish a multi-stakeholder industry-wide body to govern responsible seafood production in India.
	+ Promote greater consistency among Supplier Code of Conduct policies and guidelines across buyers to support vendors, processors, and farms to implement expectations and requirements.
	+ Consider centralizing social and environmental compliance assessment reports and making them accessible to the industry to reduce the costs for vendors.
	+ Consider providing resources (financial and otherwise) to help vendors, farms, and processing sites implement the necessary management systems, trainings, audits, technology, etc. to prevent and remediate risks.
	+ Support the establishment of and/or encourage participation in joint industry-wide grievance mechanisms for workers across sites to report issues and provide remediation, in partnership with local trusted partners. Ensure that grievance mechanisms are gender-sensitive so sexual abuse and harassment reports are handled safely and responsibly and remain confidential unless survivors choose otherwise, or disclosure is required by law.


Supply Chain Actor**Opportunities for mitigation or remediation****Retailers**

- + Establish responsible sourcing principles and human rights due diligence frameworks for supply chain oversight and accountability.
- + Define zero tolerance issues, policies, and procedures, including internal mechanisms to address zero tolerance findings if they occur.
- + Create a vendor scorecard that tracks vendor improvement over time and provides vendors with incentives for having appropriate management systems in place to respect human rights.
- + Require vendors to:
 - share Supplier Code of Conduct documents and related policies with Tier Two suppliers and production facilities
 - alert retailers to any zero-tolerance or repeat severe findings from audits
 - conduct regular third-party onsite assessments, both on an announced and unannounced spot-check basis, to assess management practices and engage with workers to report any issues
 - support efforts designed to oversee and implement activities with processing sites and farms to implement retailer expectations and requirements (e.g., trainings)
- + Encourage suppliers to participate in trainings on fair recruitment practices, including potential forced labor indicators, Employers Pays Principle⁴⁵, and the inclusion of contract workers and seasonal workers in labor and benefits policies, etc.
- + Conduct spot checks and due diligence for farms and processing sites to ensure practices align with retailers’ policies, expectations, and take appropriate actions to remediate issues.
- + Formalize and adhere to consequences when serious findings are revealed (particularly repeat findings). Procurement teams should be alerted and understand how orders may be affected. Engage with workers through e.g., Worker Surveys and grievance mechanisms to ensure that proper training, living conditions, wages and benefits, PPE, etc. have been provided.
- + Develop internal policies and processes on recruitment fee remediation and share expectations with vendors and other business partners.

**Vendors**

- + Establish long-term contracts with trusted processors and farmers. Place (and keep) orders in a timely manner and provide an appropriate timeframe for harvest, processing, and delivery of products.
- + Encourage farm and processing sites to provide workers with “Know Your Rights” trainings. Review training materials and providers to ensure they meet expectations and are aligned with retailers’ Supplier Code of Conduct. Training should include, at a minimum:
 - use of labor brokers and required standards, i.e., “Employer Pays”
 - overtime work limitations
 - labor requirements and potential forced labor risks, including freedom of movement
 - prohibition of sexual harassment
 - the benefits to which workers are legally entitled in their contract
 - minimum wage, hours, and the possibility of wage theft
 - information about document retention risks
- + Require all site management to guarantee that all workers should receive the same benefits, time off, overtime work restrictions and compensation, and deploy mechanisms to monitor adherence. Communicate expectations that workers have contracts in their first language and that details are discussed verbally to clarify wages, hourly expectations, understanding of voluntary overtime, overtime work limitations and compensation, and any other benefits.

⁴⁵ <https://www.ihrb.org/employerpays/the-employer-pays-principle>

Supply Chain Actor	Opportunities for mitigation or remediation
	<ul style="list-style-type: none"> + Work with site management to encourage enhanced opportunities for hiring women on farms, including by formalizing existing aspects of work, such as cooking, so that women receive the same benefits, i.e., paid time off and sick leave, as full-time workers. + Require vendors to make workers aware of the ability to report issues through grievance mechanisms, to trade unions, or directly to suppliers, vendors, or retailers in their local language, through multiple channels. Monitor employee understanding of these mechanisms during social compliance audits. + Deploy mechanisms to monitor sites for: <ul style="list-style-type: none"> • Working hours during off seasons and evenings. If issues are reported and verified, the site should participate in a remediation plan. • Practices used by labor agencies (e.g., no recruitment fees paid by workers) • Use of appropriate safety measures (regardless of worker contract status) + When necessary, connect farms and processing sites with aquaculture organizations operating in the region to support trainings, connection to other resources, and serve as another mechanism for reporting workplace challenges.
 <p data-bbox="205 938 409 963">Farms / Processors</p>	<ul style="list-style-type: none"> + Encourage development and implementation of management systems to ensure the health, safety, and protection of labor rights for all workers at their production facilities and locations. + Ensure all the below are in workers' first languages: <ul style="list-style-type: none"> • safety guidelines, trainings, and equipment (including part-time and contract workers). • information on worker rights against discrimination • pay slips and contracts, trainings, and other forms of worker communication + Reinforce the requirement of proper timekeeping and compliance with local laws and retailer expectations with respect to working overtime, payment of overtime hours, wages, time off, etc. Assist in identifying local service providers who can aid workers, including contract workers, experiencing sexual harassment who do not wish to report it through employment-based mechanisms. + Recommend that vendors provide current contract workers with full-time employment status (often women) to ensure equitable access to all benefits. + Encourage vendors to provide workers, particularly domestic migrant workers, with recommendations for affordable housing and short-term leases, if available. If no affordable housing is available, ensure workers have access to equal dormitories and workspaces and provide dormitories that are equipped to a standard of adequate housing in alignment with international convention expectations.⁴⁶ + Encourage vendors to provide workers with safe, accessible lockers to store personal items whereby workers hold the key (or another form of safekeeping) and have 24/7 access. + Participate in oversight of remediation plans when findings are verified.

⁴⁶ https://www.ohchr.org/sites/default/files/Documents/Publications/FS21_rev_1_Housing_en.pdf

Remediation Pilot

The scope of this HRIA included a pilot program to remediate any potential findings identified in the farmed shrimp sector in Andhra Pradesh, India. The findings above indicate that most remediation and preventative action will need to be done at a collective level rather than retailer by retailer.

Similarly, given that findings were across several risk indicators, and that there were concerns about management transparency at some sites, the remediation pilot aims to address the widest breadth of issues possible. To facilitate the remediation of these risks, ELEVATE will expand an existing grievance mechanism helpline in India to the sites involved in the HRIA. This decision has been informed by the findings, discussions with the participating retailers, the aquaculture industry, social compliance subject matter experts, and human rights experts engaged in this HRIA.

A well-designed grievance mechanism:

- is recognized by the UNGPs as a tool to access human rights
- allows for industry-wide collaboration
- brings a systematic approach to addressing industry-wide issues

The HRIA findings indicated that grievance mechanisms were either not present or workers were not aware of access to site-specific grievance mechanisms. These challenges will be addressed by ELEVATE's experienced grievance mechanism team with support from an in-country operating NGO. Workers will receive robust training provided in all local languages to help ensure they feel confident and safe in reporting issues. The on-the-ground team will also conduct regular on-site investigations to determine whether issues are reported and addressed adequately.

The consortium will issue a concise summary upon completion of the remediation exercise to share lessons learned with the broader industry.



Determining pilot scope:

Research results revealed human rights risks across a broad spectrum of areas.

Review of the findings determined that workers often did not know a grievance mechanism was available and/or did not trust the grievance mechanism in place. To remediate these risks, ELEVATE will expand an existing helpline in India into the aquaculture sector. The helpline will confidentially gather data on the risks identified in the HRIA while building trust among workers and equipping them with resources to improve their working and living conditions at shrimp aquaculture farms and processing facilities in the Andhra Pradesh region.



Operationalizing the grievance mechanism:

ELEVATE will expand its existing grievance mechanism in India to cover the 11 sites that the researchers visited. A local nonprofit experienced in running grievance mechanism hotlines and trained to ELEVATE standards will train workers on the use of the grievance mechanism. This organization will also run the resource which is available via toll-free number, text message, WhatsApp, or Facebook Messenger at no cost to workers. A grievance mechanism operator who speaks Telugu and Odia, the key languages spoken by farmed shrimp workers, will be hired, and trained on contextual risks and operating context for aquaculture farms and processing.

Cases will be escalated based on categorization of non-urgent, urgent/zero-tolerance issues, and general assistance & inquiries, which each have their own timelines and escalation steps. Grievances reported will be remediated based on ELEVATE's grievance mechanism processes. Monthly reporting will allow ELEVATE and retailers to adapt the grievance mechanism to fit workers' needs. A project team of grievance mechanism operators and program managers, and aquaculture and social compliance experts will support the grievance mechanism. A report will be published following the remediation pilot.



Site Engagement:

The remediation pilot will run until November 2023. ELEVATE will create specialized training materials and each site will receive onsite worker training on the grievance mechanism including the purpose of the grievance mechanism and how to use it. In addition, two to four onsite investigations will occur per month to monitor worker knowledge and usage of the grievance mechanism and evaluate remediation procedures.



Pilot evaluation and continuation:

A grievance mechanism is the first step to preventing and remediating issues. This pilot will inform on the effectiveness of a grievance mechanism in the farmed shrimp industry. Kroger, Lidl, and the third retailer aim to model a possible solution for ongoing remediation in the farmed shrimp industry and create impact and systemic change in farmed shrimp in India. A continued grievance mechanism is dependent on the outcome of the pilot program.

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