



EMPTY PROMISES, EMPTY OCEANS:

FONG CHUN FORMOSA (FCF) FISHERY COMPANY'S
SUSTAINABILITY COMMITMENTS

SHARK GUARDIAN • OCTOBER 2024

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EXECUTIVE SUMMARY

Our last report¹ examined tuna giant Thai Union's Sustainability Commitments, this time we turn the spotlight on the next big player, Fong Chun Formosa Fishery Company (FCF). As we found with Thai Union, FCF appears to announce new sustainability initiatives and commitments without demonstrating credible progress on its existing or former commitments, a pattern of ever-changing promises in the boardroom which masks a lack of real change at sea. There is a substantial gap between FCF's published standards and its suppliers' behaviour, and a lack of detail or evidence of actions FCF has taken to deliver those standards. Audits tend to take written commitments as indicators of progress, rather than requiring concrete proof of improvement. Consequently, supplier accountability is opaque, and there is little evidence that FCF delivers on its stated commitments.

The FCF supply chain has been tainted by illegal fishing and ongoing breaches of human, labour and environmental standards. Despite its public promises, FCF's supply chain lacks rigorous examination, its audits are not transparent, and reported violations have little repercussion. Rather than delivering on existing sustainability targets, FCF continuously sets new ones, creating a pattern of delays and obfuscation.

Fisheries Improvement Projects (FIPs) were initiated by the International Sustainable Seafood Foundation (ISSF) and implemented by multiple stakeholders including retailers, processors, producers, and fishers, to improve fishing practices and management, but appear to be failing, as evaluations of reported instances of serious issues like human trafficking and non-compliance with Regional Fisheries Management Organisation (RFMO) Conservation and Management Measures (CMMs) are delayed or downplayed. Built on partnerships and pledges, FCF's sustainability facade is undermined by inadequate execution and a lack of accountability. The company presents its operations as sustainable and progressive, but actual improvements tell a different story.

For FCF to genuinely embrace sustainability, it must take transparent, accountable and enforceable actions that address the pressing environmental and social challenges within the fishing sector. This report shows that FCF needs to move beyond talk to demonstrate tangible, measurable progress.

INTRODUCTION

A global leader in seafood processing and exports, FCF claims to support responsible and sustainable fisheries, yet has faced criticism for a lack of transparency and traceability in ongoing accusations of environmental non-compliance, human rights violations and labour abuses in its tuna supply chains.

This study compares FCF's publicly available sustainability reports and initiatives with reported issues in its supply chain, and reveals a significant gap between the company's published goals and its actual practices. The research, which incorporates findings from organisations like Greenpeace and the Environmental Justice Foundation, indicates a lack of verifiable progress and a disparity between FCF's ambitions and actions.

Mapping FCF's supply chain, suppliers and associated fleets, our report calls for FCF and other major seafood firms to insist their suppliers adhere to global standards for human rights, labour and the environment, and fulfil their sustainability promises. Our report also critiques the effectiveness of Fishery Improvement Projects (FIPs) and other transparency efforts, exposing inconsistencies between FCF's stated objectives and its real-world practices.

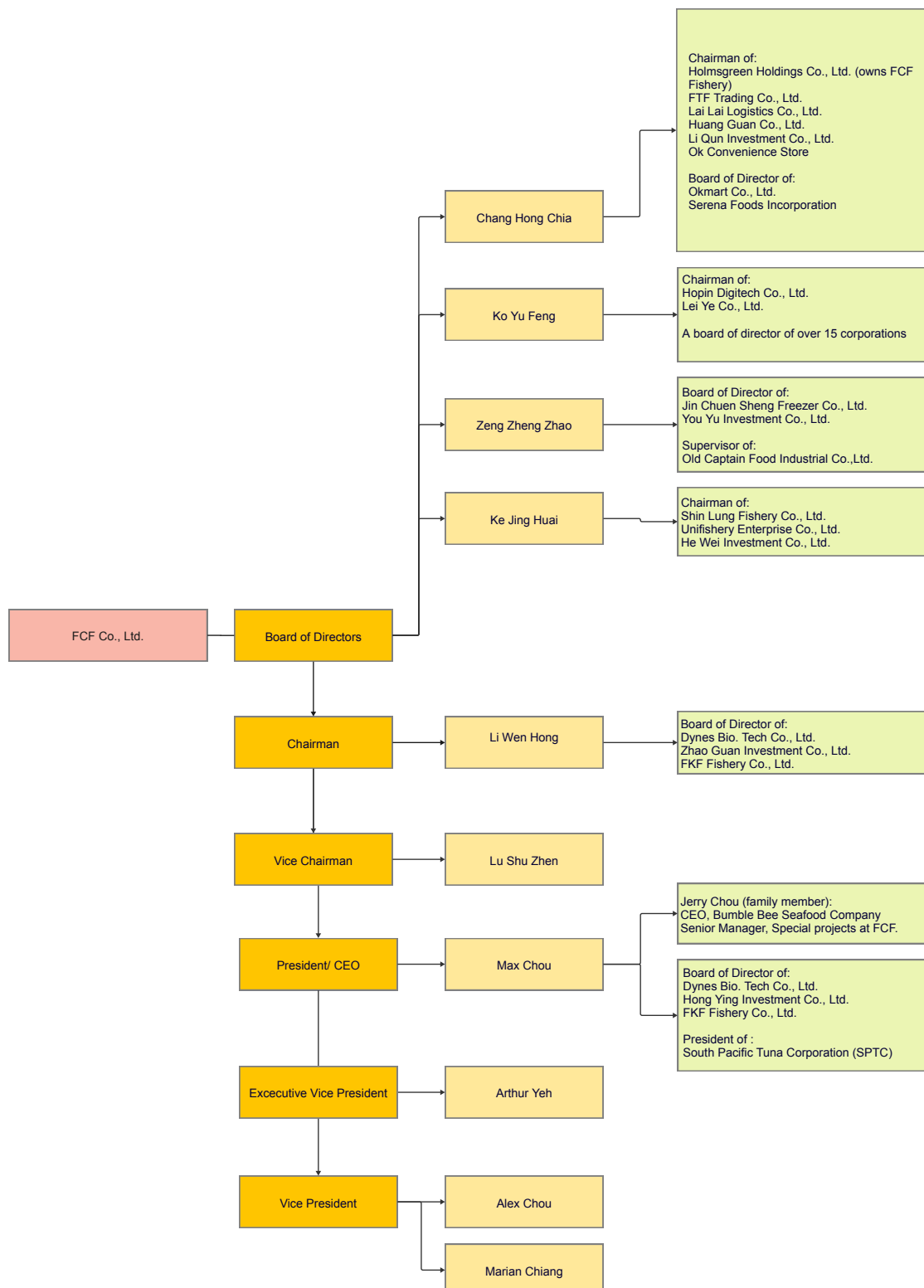


I. CORPORATE PROFILE

I.1 FONG CHUN FORMOSA FISHERY COMPANY (FCF CO., LTD.)

Founded in Taiwan in 1972, FCF is a privately owned, vertically integrated provider of marine products, including frozen tuna and squid. Its key markets include Japan, China, Thailand, the USA, South America and Europe.² FCF is the largest buyer in Taiwan's fishing industry, and, demonstrating the reach of Taiwan's distant water fisheries, is one of the world's top three tuna trading companies, along with Tri Marine and Itochu.³ In 2020, FCF acquired Bumble Bee Foods, a US-based company and major supplier of canned tuna and other shelf-stable seafood products.⁴ Figure 1 shows FCF's corporate profile, including its key management positions.

Figure 1. FCF Corporate Profile





Source: 2022 FCF Social Impact Report (image resized) <https://fcf.com.tw/wp-content/uploads/2023/09/2022-FCF-Social-Impact-Report.pdf> p. 3

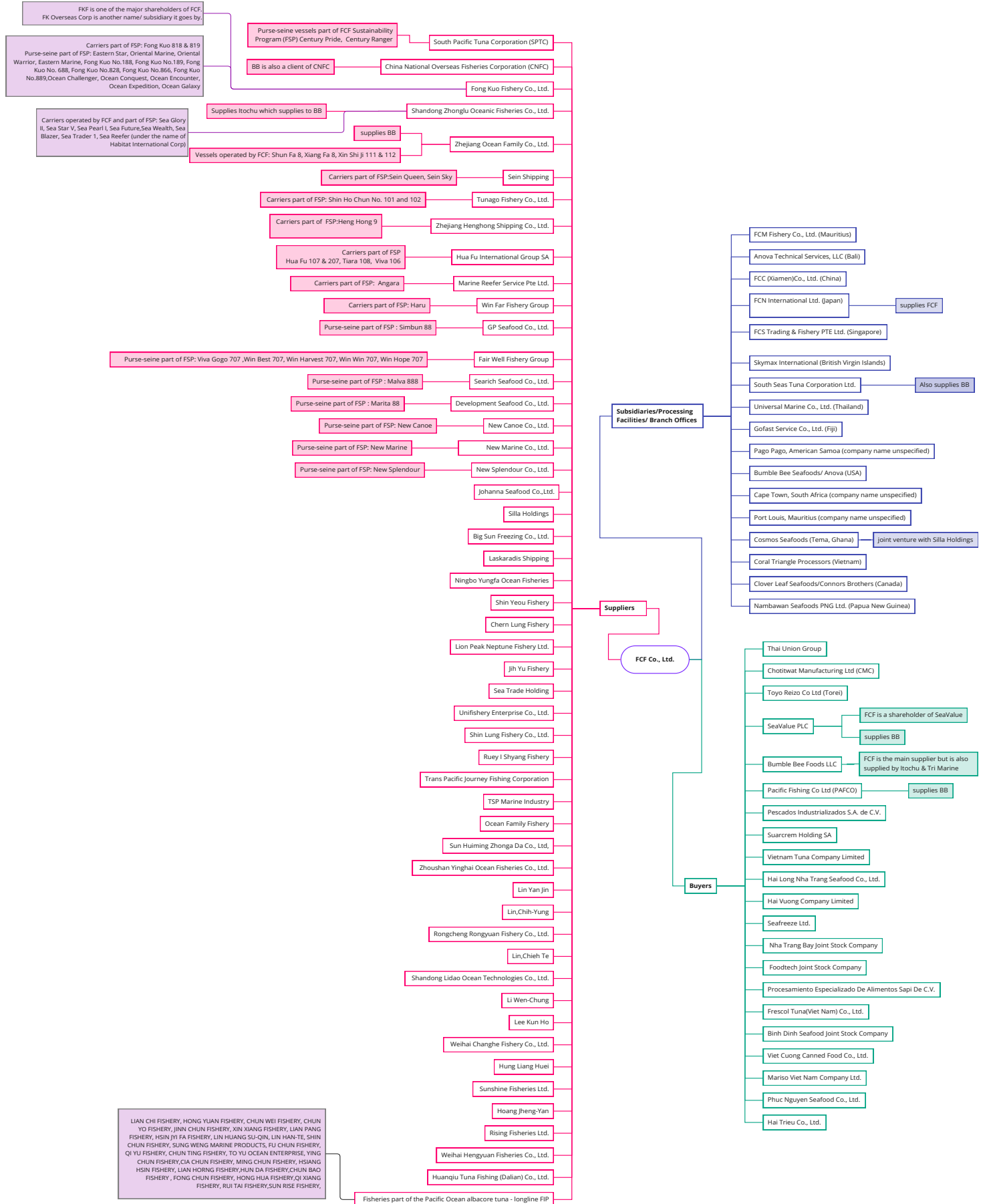
1.2 FCF SUPPLY CHAIN

In 2020, FCF reported that it had more than 250 associated fishing vessels, 30 subsidiaries located across America, Asia Pacific, the Indian and Atlantic Ocean, and tuna processing plants in Papua New Guinea.⁵ As a major tuna supplier, FCF provides an integrated supply chain solution for fishing vessels, seafood processors, brand owners and retailers.⁶ FCF operates in the following key ports: Port Vila, Vanuatu; Suva and Levuka, Fiji; Port Louis, Mauritius; and Kaohsiung, Taiwan. FCF produces semi-finished goods for brand owners and importers, and finished goods for retailers and the catering market.⁷ While FCF does not directly own fishing vessels, it sources seafood from associated fishing vessels.^{8 9} The term 'associated' implies a simple vendor-buyer relationship between vessels and FCF, while in reality a closer and more complex relationship exists.

FCF board members and persons in key management positions are involved in other fishing companies (Figure 1), and the company maintains an extensive supply chain and partnership network (Figure 2). An example of potential obfuscation is the Vietnamese Coral Triangle Processors, which according to Taiwanese sources is owned by FCF and is an integral part of its supply chain (Figure 2), yet the company is not listed on FCF's website as a processor.¹⁰

“Annually, FCF supplies 500,000 tons of tuna to large manufacturers.”

Figure 2. FCF Subsidiaries, Suppliers and Buyers



Annually, FCF supplies 500,000 tons of tuna to large manufacturers, including Bumble Bee, Thai Union, Sea Value, Chotiwat Manufacturing and Tokeyo Reizo (TOREI).¹¹ In January 2020, FCF purchased North America's largest and most recognised canned tuna brand, Bumble Bee, for USD \$928 million.¹² Bumble Bee has approximately 41% of US sales of canned albacore tuna, and a 25% market share of tuna overall. Before acquiring the company, FCF supplied Bumble Bee with nearly all of its albacore tuna.¹³

2. FINDINGS

This report notes multiple discrepancies in sustainability claims made by FCF regarding its supply chain. Considering FCF's supply chain as the heart of FCF's business, we researched three commitments: FCF's ecological commitments towards tuna fish stock, its sourcing and traceability commitments, and finally its social accountability on fishing vessels. FCF claims to work directly with its suppliers to help address environmental sustainability and social responsibility matters, and claims to have reached out to 100% of their vessel partners regarding its sustainability commitments.¹⁴

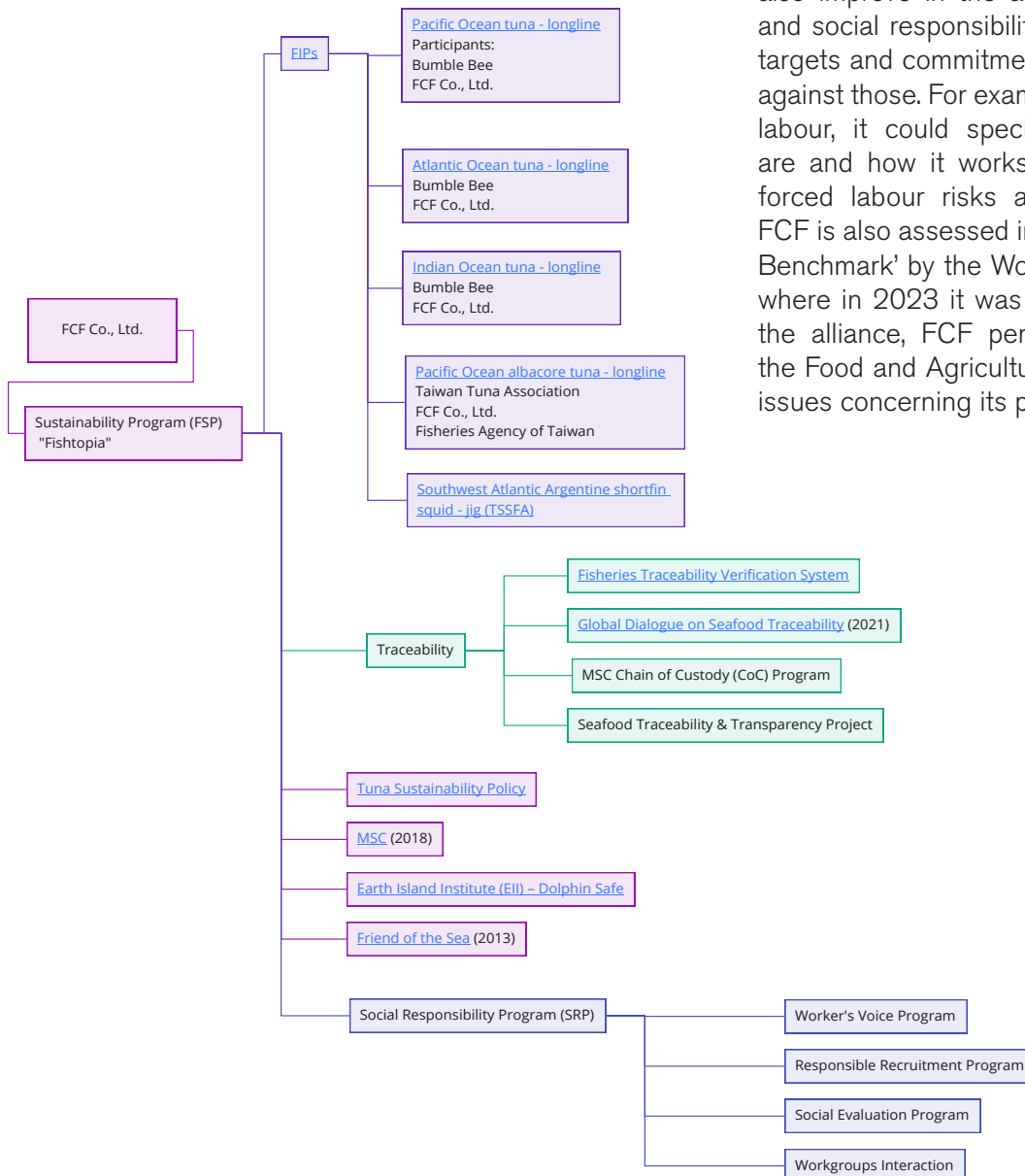
2.1 FCF SUSTAINABILITY COMMITMENTS AND SHORTCOMINGS

In 2012, FCF set up a task force, supervised by its president, overseeing various sustainability programmes.¹⁵ Five years later (2017), the company started the FCF Sustainability Program (FSP), an umbrella for its sustainability strategy. It was recognised by global certification provider, Bureau Veritas, and later rebranded as 'Fishtopia'. Figure 3 maps this strategy.

The Seafood Stewardship Index (SSI) assesses the contributions of the world's 30 largest seafood companies to the United Nations Sustainable Development Goals (SDGs). While FCF ranked comparably ahead of its peers in the measurement areas 'governance' and 'strategy measurement', the SSI contests that there is ample room for improvement across all measurement areas (Governance and strategy: score 4.9 out of 10, Ecosystems: 6.6/35, Traceability: 6.6/15, Social responsibility: 6.5/40).¹⁶ The SSI describes how FCF "does not disclose specific outcomes

that it has implemented in response to key issues for each stakeholder group. The company can also improve in the area of ecosystem impacts and social responsibility by setting more specific targets and commitments and reporting progress against those. For example, with regards to forced labour, it could specify what its requirements are and how it works with suppliers to ensure forced labour risks are mitigated effectively."¹⁷ FCF is also assessed in the 'Food and Agriculture Benchmark' by the World Benchmarking Alliance where in 2023 it was ranked 178/ 350. As per the alliance, FCF performed below average in the Food and Agriculture Benchmark with similar issues concerning its performance raised.¹⁸

Figure 3. FCF Sustainability Commitments and Partnerships



2.1.1 COMMITMENT: TUNA SUSTAINABILITY POLICY

To fulfil its ecological goals, FCF is actively engaged in Fisheries Improvement Projects (FIPs) and is pursuing MSC certifications across its supply chain, aiming for 100% responsible sourcing by 2025. As per FCF's first publicly available sustainability report, 2022, 97% of FCF's purse seine supply vessels were part of one or more MSC-certified fisheries.¹⁹ Intended as a key tool to prepare the fleets for MSC certification, the FIPs were created to improve the behaviour and transparency of fishing vessels, yet their progress appears to have stalled.

FCF's commitment to sustainable tuna sourcing and a traceable supply chain is outlined in its Tuna Sustainability Policy.²⁰ In the policy, FCF outlines its commitment to eliminate Illegal, Unreported and Unregulated (IUU) products, and its dedication to full traceability of all fishery products entering its supply chain, citing MSC certification, the FSP 'Fishtopia' for FAD-free tuna, Electronic Monitoring Systems (EMS) and FIPs. Since 2013, FCF has facilitated the registration of over 200 vessels on International Sustainable Seafood Foundation's (ISSF) ProActive Vessel Register (PVR), increasing the number of PVR-registered vessels within its supply chain. FCF is expected to partner with Satlink to install EMS on board vessels participating in FCF FIPs.²¹

In addition to MSC certification for most of its purse seine suppliers in the Western and Central Pacific Ocean (WCPO), FCF has implemented a 'FAD-free programme', which promotes FAD-free harvesting in its supply chain. Bureau Veritas evaluates this programme to ensure it is effectively managed, which includes ensuring vessels separate tuna that has been caught using FAD-free methods from tuna caught using FADs.²²

FISHERIES IMPROVEMENT PROJECTS (FIPS) – TUNA SUSTAINABILITY PROGRESS AND TRANSPARENCY

Fisheries Improvement Projects (FIPs) are multi-stakeholder initiatives established by the ISSF to respond to environmental challenges in marine fisheries.²³ Those challenges include supporting tuna fisheries to meet MSC standards and certification requirements.²⁴ FIPs are intended to leverage the

private sector's resources and influence to inform sustainable fishery policies, including the adoption of a prioritised action plan.²⁵

FIP participants commit to creating a workplan, which includes taking specific actions within a specified time frame. These actions form part of the FIP strategy for sustainability improvement.

FisheryProgress is a tracking database that operates as a one-stop shop for information on the progress of FIPs.²⁶ It uses 28 industry-standard indicators (based on the MSC Fishery Standard) to measure FIP performance against three key principles: 1) Sustainable fish stocks; 2) Minimising environmental impact; 3) Effective management.²⁷ Participating fisheries are required to achieve a minimum score of 80 out of 100 within five years.

FIPs are also required to complete self-evaluation against the FisheryProgress criteria for increased risk of forced labor and human trafficking.²⁸ FIPs that meet one or more criteria must complete the Social Responsibility Assessment (SRA), reviewed and verified by FisheryProgress, or provide evidence of an alternative assessment. The SRA is based on The Monterey Framework, which is anchored by three principles: 1) Protect human rights, dignity and access to resources; 2) Ensure quality and equitable opportunity to benefit; and 3) Improve food and livelihood security.²⁹

At the time of writing, FCF has five active (and one currently inactive) FIPs across three oceans, the Atlantic, the Indian and the Pacific (see Annex 4). Four of the FIPs are in tuna fisheries: Atlantic Ocean tuna – longline (Bumble Bee/FCF),³⁰ Indian Ocean tuna – longline (Bumble Bee/FCF),³¹ Pacific Ocean albacore tuna – longline (Taiwan Tuna Association),³² and Pacific Ocean tuna – longline (Bumble Bee/FCF Co., Ltd).³³ Three tuna FIPs currently have 'A' ratings for 'Advanced progress': Atlantic Ocean tuna – longline (Bumble Bee/FCF), Indian Ocean tuna – longline (Bumble Bee/FCF) and Pacific Ocean tuna – longline (Bumble Bee/FCF Co., Ltd).^{34 35 36} Only the Pacific Ocean albacore tuna – longline FIP (Taiwan Tuna Association) has an 'E' rating for 'Negligible Progress'.³⁷ Various shortcomings in the progress and transparency of all of these FIPs are observable.



“Both Thai Union and FCF were involved in this FIP, which met one out of four criteria for increased risk of forced labour and human trafficking.”

The Atlantic Ocean tuna longline FIP led by Bumble Bee/FCF, has an empty list on the FisheryProgress website, which claims that, “Due to the large scale nature of the FIP, with such a large vessel list, we are unable at this time to guarantee the data provided will be accurate.”³⁸ Despite providing the total number of vessels (64) registered to a number of countries, no specific vessels are named. FisheryProgress required an additional risk assessment of the FIP, which found three (plus one ‘unsure’) out of four criteria met an **increased risk of forced labor and human trafficking**. The FIP requested an extension for the additional risk assessment and was granted the extension to April 2024. However, by June 2024, the FIP had still not submitted the risk assessment to FisheryProgress.

The Western and Central Pacific Ocean tuna purse seine FIP (Thai Union) is currently inactive at the FIP’s request. Both Thai Union and FCF were involved in this FIP, which met one out of four criteria for **increased risk of forced labour and human trafficking**. A Social Responsibility Assessment Tool (SRA) was required by FisheryProgress, due March 2023. The FIP did not provide a number of vessels or any other specific details regarding their operations.

The Indian Ocean tuna longline FIP (Bumble Bee/FCF) also submitted a vessel list with no vessels, again claiming the list was too large to provide accurately.³⁹

An additional risk assessment was required with three (plus one ‘unsure’) out of four criteria met for **increased risk of forced labor and human trafficking**. This FIP has sought an extension similar to the Atlantic Ocean FIP, from April 2023 to April 2024, and the second extension from April 2024 to April 2025. Also in early 2024, the FIP’s target end date was moved from November 2024 to April 2025.

The Pacific Ocean albacore tuna longline FIP (Taiwan Tuna Association) lists 29 vessels.⁴⁰ Because the FIP met all four criteria for **increased risk of forced labor and human trafficking**, FisheryProgress required a risk assessment. The SRA was submitted on 29 March 2023. This problematic FIP will be discussed further (see subheading Pacific Ocean albacore tuna – longline (Taiwan Tuna Association) FIP on page 21).

The Pacific Ocean tuna longline FIP (Bumble Bee/FCF) also failed to provide a vessel list, which it attributed to the list’s large size.⁴¹ This FIP met three (plus one ‘not sure’) out of four criteria for **increased risk of forced labor and human trafficking**. FisheryProgress required an additional SRA, the FIP requested an extension from March 2023 to 31 March 2024, and again from March 2024 to March 2025. These extension requests raise serious doubt about their determination and integrity, given the project is set to end in June 2024.

The Southwest Atlantic Argentine shortfin squid jig FIP (TSSFA), which includes FCF as a participant, was started in December 2022 and is currently rated 'C (Some recent process)'.⁴² The FIP lists 82 vessels.⁴³ Three out of four criteria for **increased risk of forced labor and human trafficking** were met, so again an additional risk assessment was required. This FIP submitted a Social Workplan, including the SRA results, on 14 December 2023.⁴⁴ Out of the 11 core indicators assessed, one, 'Earnings and Benefits', was categorised as 'high risk'. The Workplan scheduled action to start in February 2024 and be completed by 31 December 2026

All FIPs have struggled to progress toward sustainable fisheries. The Pacific Ocean albacore tuna longline FIP (Taiwan Tuna Association) received a poor rating (E), reflecting poor progress reporting to FisheryProgress. Of those reaching their completion date in 2024 and 2025, the Pacific Ocean tuna longline FIP (Bumble Bee/FCF) and the Indian Ocean tuna longline FIP (Bumble Bee/FCF), both show a lack of real progress, as many of the actions scored worse this

year (2024) than in previous years, and less than 45% of their actions have been completed.⁴⁵ ⁴⁶ They have both requested extensions for the SRA submission, showing a lack of perseverance in addressing social responsibility and human rights issues in the fishing industry. The Atlantic Ocean tuna longline FIP has still failed to submit its required SRA, despite its due being extended to April 2024 at the FIP's request. Despite the lack of documented progress, these three FIPs have received 'A' ratings.

As demonstrated by their delaying tactics, lack of progress, and a lack of transparency around vessel information, these FIPs appear to have no real commitment to sustainable tuna fishing. It is also telling that all six (five active, one inactive) required additional risk assessments for increased risk of forced labor and human trafficking (see Annex 4). That three of five FIPs have requested extensions (some are as long as two years) to their required SRAs, suggests FCF's suppliers are making little effort towards genuine sustainability.



“As demonstrated by their delaying tactics, lack of progress, and a lack of transparency around vessel information, these FIPs appear to have no real commitment to sustainable tuna fishing.”

2.1.2 COMMITMENT: SOURCING AND TRACEABILITY

According to FCF's 2022 sustainability report, 100% of its portfolio is traced and verified by its Compliance and Customers Response Management (CCRM) department.⁴⁷ Despite these measures, instances of CMM and MSC non-compliance, as well as IUU fishing, have evaded detection.

FCF claims to have robust internal traceability systems to prevent IUU products from entering its supply chain, aligning with the MSC's Chain of Custody (MSC CoC) programme and the Global Dialogue on Seafood Traceability (GDST). FCF states that it uses the JD Edwards (JDE) system to integrate data from its supplier vessel databases, further supporting its traceability efforts.⁴⁸

In February 2023, FCF joined forces with the Environmental Justice Foundation (EJF) and the Environment and Animal Society of Taiwan (EAST) to launch the Seafood Traceability and Transparency Project.⁴⁹ This endeavour sought to evaluate and improve traceability management systems for distant-water fisheries. At the time of writing no updates on the project were available through any of the participants' websites.

In September 2022, FCF and The South Pacific Community (SPC)⁵⁰ signed an agreement to test a new type of FAD in the WCPO, the 'Jelly FAD'.⁵¹ The purpose of the agreement and partnership was to promote the use of more environmentally sustainable drifting FAD designs. The collaboration is noteworthy, as it is the first time FCF has joined forces with scientific research organisations associated with Regional Fishery Management Organisations (RFMOs). According to FCF's 2022 sustainability report, the Jelly FADs have been built and introduced to participating fishing vessels for a ten-month trial at sea.⁵²

The FCF website states that it has around 50 vessels, including purse seiners and carrier vessels, under its sustainability programme (FSP) (see Annex 2). While a list of 20 FCF-associated carriers is available on the FSP page,⁵³ the list of associated purse seiners is not displayed and is more difficult to locate on the website.⁵⁴ This is despite FCF's apparent commitment to full traceability of all fishery products in its supply chain.

The company maintains that its Longline Bycatch Mitigation Policy is consistent with the ISSF Conservation Measure (CM) 3.1(a) Shark Finning Policy and CM 3.6 Transactions with Vessels Implementing Best practices for Sharks, Sea Turtles, and Seabirds.⁵⁵ Unfortunately, the reported behaviour of FCF vessels appears to tell a different story.

CMM OR MSC NON-COMPLIANCE AND IUU FISHING BY FCF SUPPLIERS

One of the 25 purse-seiners in the FCF sustainability programme (FSP),⁵⁶ the FV Simbun 88, was allegedly involved in significant CMM violations. The FSP fleet operates in the WCPO under Western & Central Pacific Fisheries Commission (WCPFC) CMMs and the FSP's own verification and traceability systems. In 2019, the FV Simbun 88 (owned by GP Seafood Co. Ltd) was found to have deliberately set nets on tuna schools associated with **whale sharks** (violating CMM 2019-04) and **Bryde's whales** (violating CMM 2011-03). Additionally, silky sharks were reportedly mishandled and landed on the vessel's decks, contravening CMMs 2019-04, 2018-04 and 2013-08. The vessel also inaccurately recorded bycatch, violating CMM 2013-05.⁵⁷

Simbun 88, 30 August 2022. Source: WCPFC



Bumble Bee has been involved in the 'Trace My Catch' initiative since 2015. 'Trace My Catch' claims to allow consumers to access information about product sources, including species, fishing methods, fishing areas, fishing vessels and processing plants. Greenpeace East Asia found that details provided through the 'Trace My Catch' campaign by Bumble Bee were sometimes incorrect.⁵⁸ Details on some tuna cans did not match AIS information reviewed by Greenpeace, which revealed vessels were fishing in areas known for overfishing. Almost half of the vessels Bumble Bee sourced from were Taiwanese-flagged or owned; information from the Taiwan Fisheries Agency (TFA) shows that these vessels were fishing in unauthorised areas.⁵⁹

Interviews with fishers conducted by Greenpeace East Asia, and an AIS analysis by Global Fishing Watch, further corroborated that the 'Trace My Catch' initiative was tainted by vessel involvement in IUU fishing activities. In 2021, when the FV De Chan No.116 was supplying Bumble Bee, it was allegedly found fishing outside the fishing period authorised by the TFA, and was accused of **shark finning and illegal transshipment at sea.**⁶⁰

In 2018, the Panama-flagged FV Haru, one of FCF's sustainability programme carriers, was reported to be involved in IUU fishing activities.⁶¹ The TFA was notified by two Taiwanese purse seiners, FV Ta Ching No. 666 and FV Ching Feng No. 767 that, before reaching its destination port in Yamagawa, Japan,⁶² FV Haru unloaded some of its catches at the Chinese port of Ningbo without prior TFA authorisation.⁶³

An AIS analysis, supported by vessel crew interviews, conducted by Greenpeace East Asia in 2019 revealed some vessels that worked with FCF were involved in shark finning.⁶⁴ Panamanian reefer FV Ibuki was found to be involved in transshipment at sea with fishing vessels suspected of IUU fishing and forced labour. The Taiwanese longliner FV Wei Ching was found to be involved in transshipment at sea with Senegalese longliner FV Lisboa. The owners of both vessels denied the claims.⁶⁵

According to the 2022 Financial Transparency Coalition report,⁶⁶ China National Fisheries Corporation (CNFC)⁶⁷ and Rongcheng Rongyuan Fishery Co Ltd⁶⁸ are among the top ten companies flagged for previous involvement in IUU fishing. CNFC ranks second with 16 IUU vessels, and Rongcheng Rongyuan Fishery ranks seventh with seven IUU vessels. Both are suppliers of FCF and Bumble Bee.

Between 2018 and 2022, vessels connected to FCF's supply chain and sustainability programmes were involved in IUU fishing and other breaches of sustainability standards. This illustrates a lack of commitment by suppliers to the sustainability commitments FCF has set out for its supply chain, and demonstrates how much more remains to be done to fulfil FCF's commitment to sustainable sourcing and traceability. FCF states that the foundation of its business operations are its suppliers. If that is so then FCF needs to evaluate their functioning against its sustainability standards more critically.



Haru, 08 November 2022. Source: WCPFC

2.1.3 COMMITMENT: SOCIAL ACCOUNTABILITY ON FISHING VESSELS

To safeguard the well-being of crew members, minimise human rights risks and adhere to international standards, FCF introduced its Social Responsibility Program (SRP) in 2017, aligning with the Seafood Task Force Code of Conduct.⁶⁹ At the time of writing (April 2024), it appears that their efforts towards social responsibility are still in their infancy stage.

The recently updated version of the FCF Supplier Social Requirement – for Vessel Owners (v4.0), claims to empower vessel owners in its supply chain with the ability to thoroughly assess their management systems.⁷⁰ This supplier social requirement references several international standards: the International Labour Organization (ILO) conventions (without referring to specific conventions); Seafood Task Force Auditable Standards and Recruitment Fee Guidance; Best Seafood Practices: Responsible Fishing Vessel Standards (RFVS); and the Fairness, Integrity, Safety, and Health (FISH) Standard for Crew. These standards all emphasise the importance of maintaining adequate working and living conditions on fishing vessels.

As described in FCF's 2022 sustainability report, the role of its internal Vessel Service and Governance Team is to work with third-party auditors to inspect vessels in its supply chain. In 2022, FCF expanded the implementation and training of the anonymous and confidential grievance mechanism, Workers Voice, from 18.1% to 68.5% of vessels.⁷¹ It is unclear why this mechanism has not been extended to 100% of its vessels.

The report also states that in 2022, FCF expanded its identification of human rights issues within its supply chain through the Social Assessment Project, conducted by a qualified third-party company. Any issues or gaps identified were documented in the FCF database and labelled as "areas of improvement". To enhance human rights risk management, FCF planned to implement corresponding risk mitigation and remedial measures with follow-up actions scheduled for 2023. None of these assessments or

follow-up actions have been made publicly available.⁷²

FCF has also been involved in initiating and conducting capacity-building workshops, including a multi-year programme started in 2021 with the Indonesia Fisherman Association (INFISA), to ensure that recruitment agencies and other stakeholders in its supply chain are aware of, and adopt, better labour recruiting practices.⁷³

Despite these laudable commitments, recent reports have exposed cases of human rights and labour abuse associated with FCF's supply chain. It should be no surprise that FCF struggles to commit to sustainable practices since it does not have long-term partnerships with many of its suppliers,⁷⁴ which means FCF does not have the oversight and control that its published ambitions suggest.

FISHERIES IMPROVEMENT PROJECTS (FIPS) – SOCIAL ACCOUNTABILITY

All FCF tuna FIPs⁷⁵ have met three or four out of four criteria for increased risk of forced labor and human trafficking. As a result, FisheryProgress required additional risk assessments using the Social Responsibility Assessment (SRA) tool for the Seafood Sector.⁷⁶ Three FCF FIPs requested an early 2024 extension for the SRA, **postponing actions to address risks of forced labour and human trafficking by up to a year.**

As mentioned in 2.1 (Tuna Sustainability Policy), FIPs with FCF and Bumble Bee as key participants did not provide FisheryProgress with participating vessel lists as part of their documentation for assessed fisheries. The FIPs claimed vessel lists would be so large that they couldn't guarantee their accuracy.⁷⁷ ⁷⁸ The question of whether transparency is possible with opaque supply chains, should hang over every potentially hollow sustainability promise.

“Three FCF FIPs requested an early 2024 extension for the SRA, postponing actions to address risks of forced labour and human trafficking by up to a year.”

PACIFIC OCEAN ALBACORE TUNA – LONGLINE (TAIWAN TUNA ASSOCIATION) FIP⁷⁹

The Pacific Ocean albacore tuna – longline (Taiwan Tuna Association) FIP was the only FIP that submitted its assessment without requesting an extension. Unfortunately, details of the assessment indicate the fishery is anything but sustainable.

In 2021, FCF partnered with the Taiwan Tuna Association and Fisheries Agency of Taiwan to participate in the FIP for Pacific Ocean albacore tuna – longline (Taiwan Tuna Association). As indicated in its 'self-evaluation of risk criteria' for human rights and social responsibility performance, this FIP met all four criteria for increased risk of forced labor and human trafficking and required an additional SRA. The SRA results showed that among the 13 core indicators for Principle 1: Protect human rights, dignity, and access to resources, five indicators were ranked as high-risk:^{80 81} Human trafficking and forced labour (1.1.2a), Freedom of association and collective bargaining (1.1.4), Earnings and benefits (1.1.5), Adequate rest (1.1.6), and Occupational safety (1.1.8). The FIP has developed a social work plan to improve the five indicators with three actions: #1 'Promotion and explanation of labour rights', #2 'Improve the situation of overtime', #3 'Improve the occupational safety of fishing vessel' (See Table 1).⁸² Indicator 1.2.2 'Corporate responsibility and transparency', which is critical to social accountability and may provide tangible evidence of a company's sustainability effort, was not assessed.

An updated SRA result from March 2024⁸³ indicates evidence of the FIP's strategies for improving Principle 1.1.2a Human trafficking and forced labour, which raised the score of this principle to Medium Risk (Yellow). Nonetheless, actions #1 and #2 still apply to this principle in the Social Work Plan update from April 2024, meaning they are still being worked on.⁸⁴

Table 1. Pacific Ocean albacore tuna – longline (Taiwan Tuna Association) Human rights and social responsibility performances for Principle 1: Protect human rights, dignity, and access to resources

| Component | Performance Indicator | Score | Action # |
|---|--|--------------|----------|
| Principle 1: Protect human rights, dignity, and access to resources | | | |
| 1.1 Human and Labour Rights | 1.1.1 Abuse and harassment | Yellow | |
| | 1.1.2a Human trafficking and forced labour | Yellow | 1, 2 |
| | 1.1.2b Debt bondage in small-scale fisheries | N/A | |
| | 1.1.3 Child labour | Green | |
| | 1.1.4 Freedom of association and collective bargaining | Red | 1 |
| | 1.1.5 Earnings and benefits | Red | 1, 2 |
| | 1.1.6 Adequate rest | Red | 1, 2 |
| | 1.1.7a Access to basic services for worker housing/live-aboard vessels | Yellow | |
| | 1.1.7b Access to services for small-scale fishing communities | N/A | |
| | 1.1.8 Occupational safety | Red | 3 |
| | 1.1.9 Medical response | Yellow | |
| 1.2 Access Rights | 1.2.1 Customary resource use rights | N/A | |
| | 1.2.2 Corporate responsibility and transparency | Not assessed | |

Notes: Based on 'Pacific Ocean albacore tuna – longline (Taiwan Tuna Association) Social Responsibility Assessment Tool for the Seafood Sector Risk Assessment Results'.⁸⁵

A red score indicates high risks.⁸⁶ A yellow score indicates medium risks.⁸⁷ A green score indicates low risks.⁸⁸

SUPPLIER VESSELS AND ‘LABOUR’

In 2018 FCF was accused of indirect links to human trafficking, and the potential exploitation and abuse of crew members aboard some of the fishing and fishing-related vessels it allegedly sourced from.⁸⁹ FCF President Max Chou called the allegations misleading, claiming the incidents were old and had been addressed in coordination with the Taiwanese Fisheries Department.⁹⁰ He provided no evidence for how the allegations were addressed.

FV Tunago No. 61 had a history of abuse towards migrant crew members. The Tunago Fishing Company that owns vessels FV Tunago No. 61, FV Shin Ho Chun No. 102 and FV Shin Ho Chun No. 101 is part of FCF’s supply chains. FV Shin Ho Chun No. 102, which supplies FCF, reportedly transhipped with FV Tunago No. 61 just days before the **murder** of its captain.⁹¹



“Another Taiwanese vessel that supplied FCF, FV Fwu Maan No. 88, had crew complaining about three risk indicators for forced labour in 2019: abuse of vulnerability, physical and sexual violence, and retention of identity documents.”

FCF was found trading with two fishing vessels – FV Wei Ching and FV Shin Lung 216 – which were named as having trafficked crew members named in the 2013 Giant Ocean **human trafficking** case.⁹² To add to the complexity of the supply chain, FV Shin Lung 216 is owned by Shin Lung Fishery Co. Ltd, whose Chairman Ke Jing Huai is currently part of the FCF board of directors (see FCF corporate profile, Figure 1).

Another Taiwanese vessel that supplied FCF, FV Fwu Maan No. 88, had crew complaining about three risk indicators for forced labour in 2019: **abuse of vulnerability, physical and sexual violence**, and retention of identity documents.⁹³



FV Da Wang, a Taiwan-owned, Vanuatu-flagged vessel from which Bumble Bee sourced tuna, was confirmed to be connected with an incident of a fisher being **beaten to death** at sea in 2019. Tuna sourced from FV Da Wang had been found on sale at Harris Teeter,⁹⁴ and was then banned by the US Customs and Border Patrol in all US ports in 2020.^{95 96}

Examining these reports about labour rights violations in FCF's supply chain against the backdrop of FCF's commitment to social accountability on fishing vessels, highlights a disparity between FCF's stated commitments to crew welfare and real-world conditions at sea. The absence of publicly available independent vessel audit reports, and a lack of action taken on violations by supplier vessels, highlights a gap between FCF's sustainability goals and their implementation.

"Bumble Bee Foods" Petition Delivery in San Diego: Greenpeace USA and crew from the Arctic Sunrise deliver a petition with over 51,000 signatures calling on Bumble Bee and its owners, Fong Chun Formosa (FCF), to stop sourcing from ships that exploit workers and our oceans. Activists hoisted a banner in front of the company's headquarters that read "End Modern Slavery" after marching to Bumble Bee from the M/V Arctic Sunrise, docked at the pier in San Diego."

Source: Greenpeace <https://media.greenpeace.org/Detail/27MZIFJF2WPRK>



3. CONCLUSIONS AND RECOMMENDATIONS

“As an industry leader, FCF bears a significant responsibility to ensure the integrity of its supply chain and cannot rely on unverified promises by suppliers.”

FCF should be recognised for its attempts to address environmental, human and labour rights issues within its supply chain. However, the company's current practice of auditing and reporting fails to demonstrate tangible progress or effective follow-up on either its commitments or reported violations. For its efforts to be credible, FCF must go beyond hollow commitments and be transparent about its progress, and openly acknowledge its failures. A lack of verifiable improvement challenges the credibility of FCF's efforts to improve fisheries sustainability, and its pattern of making new promises while failing to meet the existing ones, looks more like a facade of ethical responsibility than genuine action.

FCF's 2023 company update report stated that it has committed to “a strong emphasis on enabling vessel owners to thoroughly scrutinise and assess its management systems to prevent forced labour issues”.⁹⁷ This commitment could mark a new era for the tuna industry, where leading companies such as FCF pay careful attention to their supply chain and ensure sustainable fisheries are not just marketing buzzwords. Unfortunately, the lack of action on past commitments makes it hard to be optimistic.

Reading through various FCF reports, press releases and company updates on sustainability initiatives, one gets a sense of the buck being consistently passed around as to who takes responsibility for doing the actual work of abiding by the sustainability practices. The wording used by FCF towards vessel owners and fishing companies who supply FCF to conform to its various sustainability practices and strategies is weak, without enforcement mechanisms, and there is no indication of who is held accountable when commitments are not followed within the supply chain.

FCF must progress from making new promises to actively tackling current challenges as they arise, while also showing demonstrable and substantial results with a particular focus on enhancing the transparency of its sourcing operations.

The lack of accessible information on sustainability standards followed by the fishing vessels and companies that supply FCF, makes it impossible to confirm its claims of improvements and traceability. FCF claims to conduct audits, but the absence of publicly available results raises doubts about its dedication to eradicating forced labour and unsustainable practices

from its tuna supply chain. As an industry leader, FCF bears a significant responsibility to ensure the integrity of its supply chain and cannot rely on unverified promises by suppliers. If the complexity of FCF's supply chain makes current sustainability commitments impractical, it may be necessary to rethink its approach. Adopting greater transparency, accountability and independent verification, while also enhancing Observer programmes and embracing collaborative solutions, will position FCF to manage its procurement processes, crew welfare and environmental footprint more effectively.

Another concern that should be addressed is the possibility of collusion and oligopoly. Our previous report,⁹⁸ which focused on Thai Union, discussed the potential for collusion and oligopoly. The same concern applies here, given FCF is a key player in the global seafood industry with influential ties to Thai Union. Both reports put the spotlight on potential conflicts of interest and the impact of those potential conflicts on sustainability and ethical standards. The interconnection of such major industry players should be regularly scrutinised, particularly against the backdrop of Bumble Bee, a brand under FCF's umbrella that has been embroiled in controversies over misleading sustainability claims and its involvement in a price-fixing scheme.⁹⁹

These connections underscore the challenge of ensuring ethical practices and environmental protection within complex supply chains, where commercial advantages and industry influence can take precedence over human rights and environmental standards. On top of this, the International Seafood Sustainability Foundation (ISSF) faces criticism for its industry affiliations with Thai Union and FCF. These cosy relationships risk undermining its reputation as an organisation that exists to promote tuna sustainability, and raise questions about the effectiveness and integrity of its conservation efforts. The complex web of relationships and incidents outlined in this report illustrates the pressing need for greater transparency and accountability in sustainability initiatives.

With more than 90% of the world's primary marine fish stocks categorised as fully exploited, over-exploited or substantially depleted,¹⁰⁰ industry leaders and standard-setting bodies can no longer afford to make empty sustainability claims in the name of increased profits and must deliver on their promises.

APPENDICES

ANNEX I. GLOSSARY

| | |
|--------|---|
| AIS: | Automatic Identification System |
| CCRM: | Compliance and Customers Response Management |
| CNFC: | China National Fisheries Corporation |
| CMM: | Conservation and Management Measures |
| EJF: | Environmental Justice Foundation |
| EAST: | Environment and Animal Society of Taiwan |
| FADs: | Fish Aggregating Devices |
| FAO: | Food and Agriculture Organization of the United Nations |
| FCF: | Fong Chun Formosa Fishery Company |
| FKF: | Fong Kuo Fishery |
| FV: | Fishing Vessel |
| FIP: | Fishery Improvement Project |
| ILO: | International Labour Organization |
| ISSF: | International Seafood Sustainability Foundation |
| IUU: | Illegal, Unreported and Unregulated fishing |
| MSC: | Marine Stewardship Council |
| PVR: | ProActive Vessel Register |
| RFMO: | Regional Fisheries Management Organisation |
| RFVS: | Responsible Fishing Vessel Standards |
| SDG: | Sustainable Development Goals |
| SPC: | South Pacific Commission |
| SPTC: | South Pacific Tuna Corporation |
| SRA: | Social Responsibility Assessment Tool |
| SSI: | Seafood Stewardship Index |
| TFA: | Taiwan Fisheries Agency |
| TU: | Thai Union |
| WCPFC: | Western and Central Pacific Fisheries Commission |
| WCPO: | Western and Central Pacific Ocean |

ANNEX 2. FSP PURSE SEINE AND CARRIER FLEET^{101 102}

| No. | FSP's Purse Seine Fleet | IMO | Flag |
|-----|-------------------------|---------|--------------------|
| 1 | Fong Kuo No. 188 | 9712125 | Taiwan |
| 2 | Fong Kuo No. 189 | 9720213 | Taiwan |
| 3 | Fong Kuo No. 688 | 9764271 | Taiwan |
| 4 | Fong Kuo No. 828 | 9712137 | Taiwan |
| 5 | Fong Kuo No. 866 | 8748646 | Taiwan |
| 6 | Fong Kuo No. 889 | 9674244 | Taiwan |
| 7 | Eastern Marine | 9217369 | Nauru |
| 8 | Eastern Star | 8996097 | Nauru |
| 9 | Oriental Marine | 9217357 | Nauru |
| 10 | Ocean Galaxy | 8996310 | Nauru |
| 11 | Ocean Encounter | 8996281 | Nauru |
| 12 | Ocean Conquest | 9097343 | Nauru |
| 13 | Ocean Expedition | 9097367 | Nauru |
| 14 | Ocean Warrior | 9097317 | Nauru |
| 15 | Ocean Challenger | 9517264 | Nauru |
| 16 | New Marine | 9745823 | Nauru |
| 17 | New Canoe | 9746281 | Nauru |
| 18 | New Splendor | 9771951 | Nauru |
| 19 | Simbun 88 | 9745469 | Nauru |
| 20 | Malva 888 | 9761396 | Nauru |
| 21 | Viva Gogo 707 | 9220287 | Vanuatu |
| 22 | Win Best 707 | 8996293 | Vanuatu |
| 23 | Win Harvest 707 | 9215000 | Vanuatu |
| 24 | Win Win 707 | 9887449 | Vanuatu |
| 25 | Win Hope 707 | 9945368 | Vanuatu |
| | | | Updated: July 2023 |

| No. | FCF Associated Carrier Vessels for FSP | IMO |
|-----|--|---------|
| 1 | Sea Glory II | 9009695 |
| 2 | Sea Star V | 8914221 |
| 3 | Sea Pearl I | 9008639 |
| 4 | Fong Kuo 818 | 8904070 |
| 5 | Sea Trader I | 8919893 |
| 6 | Fong Kuo 819 | 8913992 |
| 7 | Haru | 9241932 |
| 8 | Sea Reefer | 9175274 |
| 9 | Tai Fu No. 3 | 7927453 |
| 10 | Hua Fu 107 | 8518819 |
| 11 | Hua Fu 207 | 9041540 |
| 12 | Tiara 108 | 8420763 |
| 13 | Viva 106 | 8122385 |
| 14 | Sea Future | 8860444 |
| 15 | Shin Ho Chun No. 102 | 9262182 |
| 16 | Sea Wealth | 9057537 |
| 17 | Sea Blazer | 9057549 |
| 18 | Webo 307 | 9035072 |
| 19 | Zhong Yu Marine | 9287845 |
| 20 | Frio Las Palmas | 8908193 |

Updated: May 2024

ANNEX 3. MSC PERFORMANCE INDICATOR SCORING

There are 28 performance indicators in the MSC Fisheries Standard that sit under the three principles.

A fishery is assigned a score for each performance indicator where 60 is the minimum acceptable performance, 80 is global best practice and 100 is near-perfect performance. To be certified, a fishery must score at least 60 for each of the 28 performance indicators.

If a fishery scores between 60 and 79 for any performance indicator, it is required to improve its fishery's performance against that indicator so that it scores 80 or above within five years. This improvement is called a condition.

Principle average scoring

A fishery must also score an average of 80 across all performances under each of the three principles. For full details please see 'Get Certified – Your guide to the MSC fishery assessment process' document.¹⁰³

ANNEX 4. FIPS WITH FCF INVOLVEMENT

| FIP Name | No. of vessels | Flag state(s) | FAO/EEZ ¹⁰⁴ | FIP Rating | Social responsibility ¹⁰⁵ | Projected end date | Remarks |
|--|----------------|--|--|------------|---|--------------------------|---|
| Atlantic Ocean tuna - longline (Bumble Bee/FCF) | 64* | Panama, Belize, Namibia, Taiwan | FAO 34, 41, 47 / Namibia | A | Risk Assessment required with 3 (+1 'unsure') out of 4 criteria met.- Requested extension from Apr 2023 to Mar 2024, but granted until Apr 2024. | Oct 2026 | *The FIP working plan mentioned the following flag states and numbers of vessels, yet without giving the vessel names: Taiwan: 37, Namibia: 2, Panama: 17, Belize: 8 Total: 64 The FIP provided a vessel list document with no vessels in it, claiming the list was too large to be provided accurately. |
| INACTIVE Western and Central Pacific Ocean tuna - purse seine (Thai Union) | - | South Korea, Nauru, FSM, the US, Taiwan, PNG, Kiribati | FAO 71, 77 / Nauru, FSM, Kiribati, Marshall Islands, Palau, PNG, Solomon Islands, Tuvalu | - | Risk assessment required with 1 out of 4 criteria met – due 31 Mar 2023. | Aug 2024 | Inactive – At FIP's request |
| Indian Ocean tuna - longline (Bumble Bee/FCF) | n/a* | Taiwan, China, Malaysia, Seychelles, Oman | FAO 51, 57 / Madagascar, Mauritius, Seychelles | A | Risk Assessment required with 3 (+1 'unsure') out of 4 criteria met. Requested extension from Apr 2023 to Mar 2024, but granted until Apr 2024. The second extension is granted until Apr 2025. | Apr 2025 (prev Nov 2024) | *Provided a list with no vessels in it, claiming the list was too large to be provided accurately. |
| Pacific Ocean albacore tuna - longline (Taiwan Tuna Association) | 29 | Taiwan, Vanuatu | FAO 71, 77 | E | Risk Assessment required with 4 out of 4 criteria met. Submitted on 29 Mar 2023 | Jul 2026 | |
| Pacific Ocean tuna - longline (Bumble Bee/FCF Co.,Ltd) | n/a* | China, Fiji, Taiwan, Vanuatu, Panama | FAO 71, 77, 81, 87/ Solomon Islands, Vanuatu, Tonga, Tuvalu, Cooks Islands, Micronesia, Fiji, Kiribati, PNG, Samoa, American Samoa | A | Risk Assessment required with 3 (+1 'not sure') out of 4 criteria met. Requested extension from Mar 2023 to 31 Mar 2024, and from Mar 2024 to Mar 2025. | Jun 2024 | *Provided a list with no vessels in it, claiming the list was too large to be provided accurately. |
| Southwest Atlantic Argentine shortfin squid - jig (TSSFA) | 82 | Taiwan | FAO 41 / Falkland Islands | C | Risk Assessment required with 3 out of 4 criteria met. Social Workplan including SRA results was submitted on 14 Dec 2023. | Dec 2027 | The project started in Dec 2022. As of June 2024, 0% of actions have been completed. |

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