



DISCUSSION SESSION ON

ENSURING RIGHTS AND COMPETITIVENESS IN BANGLADESH'S SHRIMP INDUSTRY: A HRDD PERSPECTIVE

PRESENTATION BY

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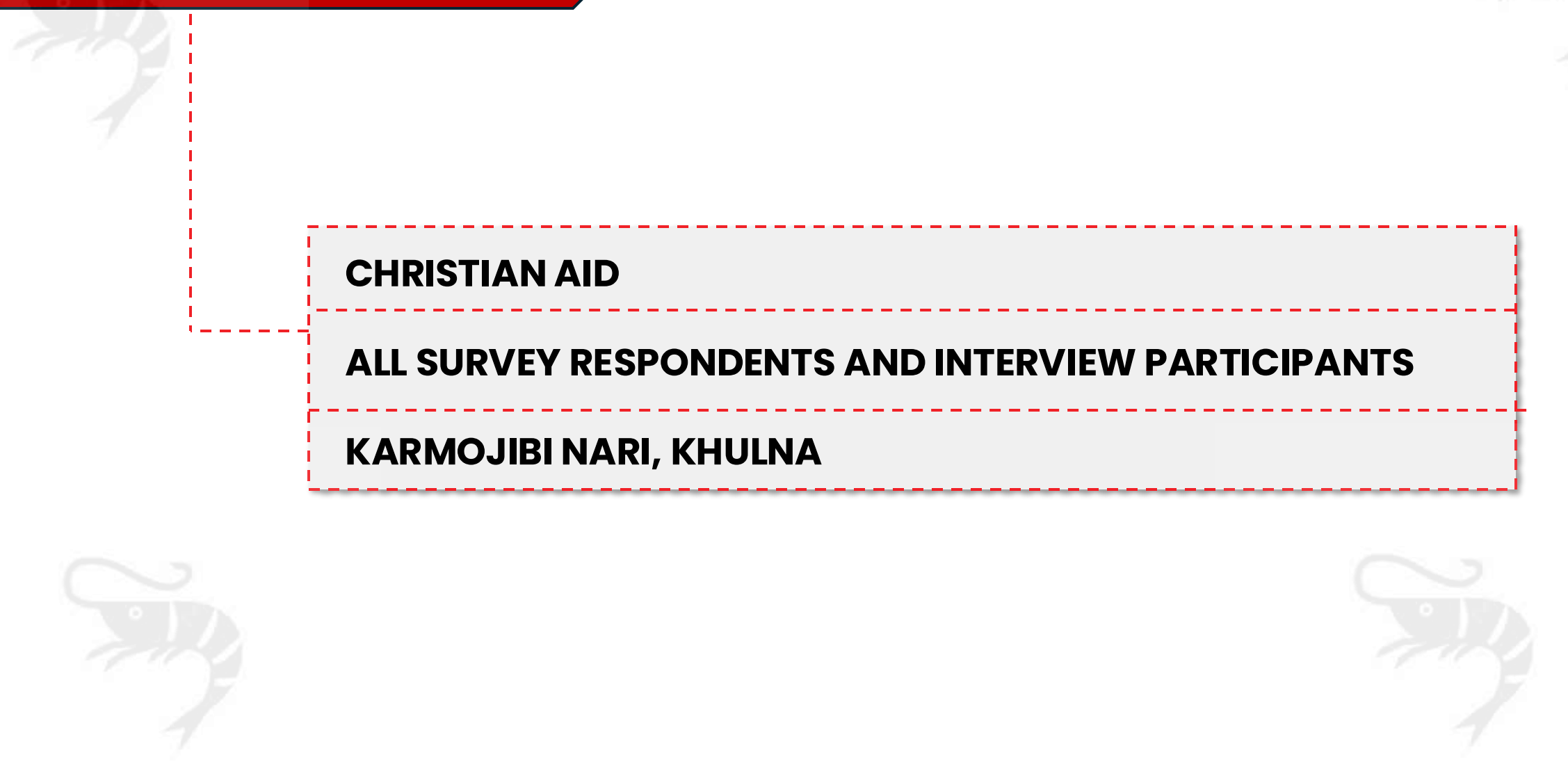
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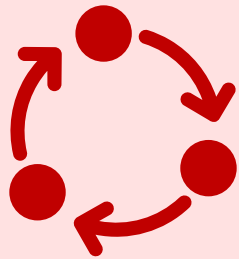


CHRISTIAN AID

ALL SURVEY RESPONDENTS AND INTERVIEW PARTICIPANTS

KARMOJIBI NARI, KHULNA

1. CONTEXT

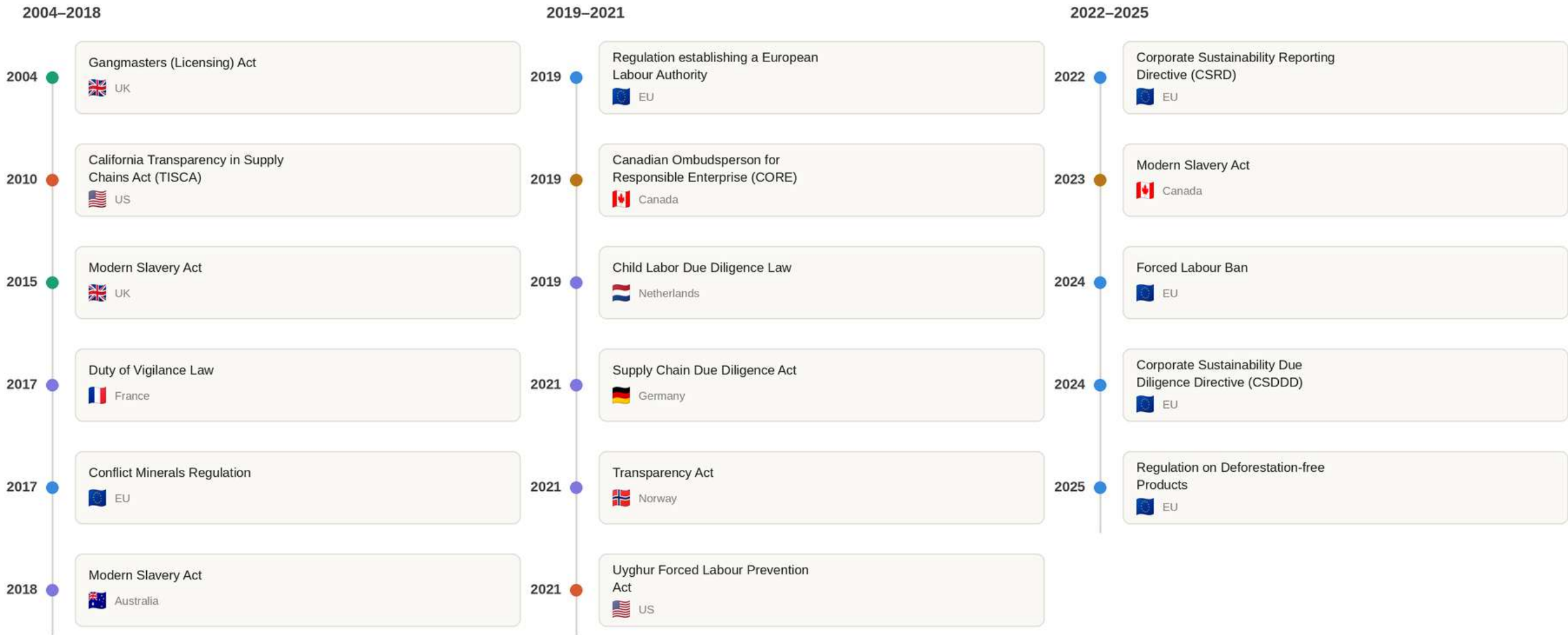


HRDD is an ongoing process through which businesses **identify, prevent, mitigate, and account** for how they address their impacts on people

The human rights due diligence process expected of businesses



1. CONTEXT



Source: Based on Ethical Trading Initiative

2. OBJECTIVES

The objectives of this study are

- 1** ➤ To **map the supply chain structure** to identify specific points of vulnerability for labour abuses, particularly among small and informal suppliers
- 2** ➤ To evaluate the current level of awareness and **preparedness of HRDD principles implementation** among export-oriented enterprises
- 3** ➤ To diagnose the prevalence and nature of **key labour rights violations** within the sector's workforce and supply chains
- 4** ➤ To develop **evidence-based recommendations** for policymakers, industry associations, and enterprises to improve compliance, protect workers, and enhance export competitiveness

3. ANALYTICAL FRAME



4. METHODOLOGY



LITERATURE REVIEW

Reports • Journal Articles

Refined the analytical framework and methodological approach, contextualising and complementing findings from primary data.



ENTERPRISE SURVEY

33 factories • 33 depots

Assessed management awareness of and preparedness for Human Rights Due Diligence (HRDD) in Khulna, Chattogram & Cox's Bazar. Responses anonymised.



WORKER SURVEY

378 workers

Evaluated compliance with labour rights standards across all stages of the shrimp value chain, excluding global buyers.



FIELD VISITS

2+ visits

Conducted in key shrimp industry clusters to map the value chain and gather direct observational data on industry realities.



KEY INFORMANT INTERVIEWS

9+ KIIs

Held with policymakers, regulators, and industry representatives to explore governance frameworks shaping HRDD practices.

4. METHODOLOGY

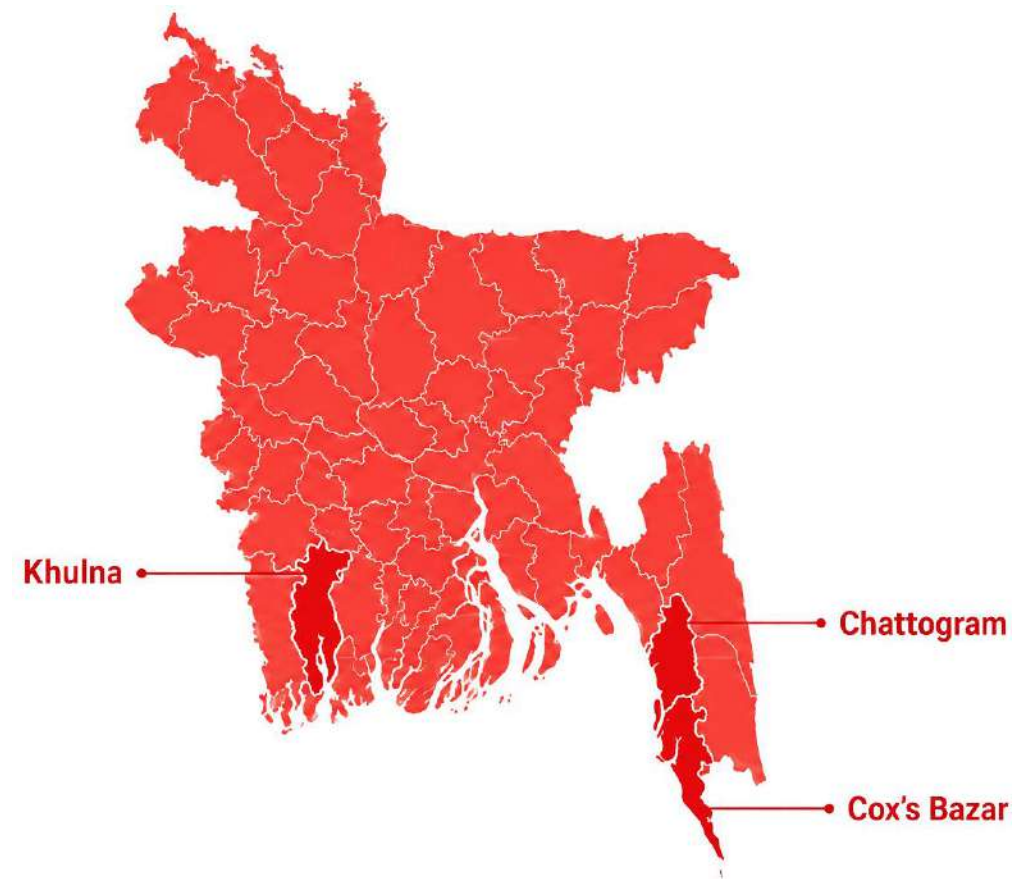
Table: Distribution of Surveyed Firms by District and Company Type (n = 66)

District	Shrimp Processing Firms (n)	Depot Firms (n)	Total Surveyed Firms (n)
Chattogram	15	15	30
Cox's Bazar	2	3	5
Khulna	16	15	32
Total	33	33	66

Table. Distribution of Surveyed Workers

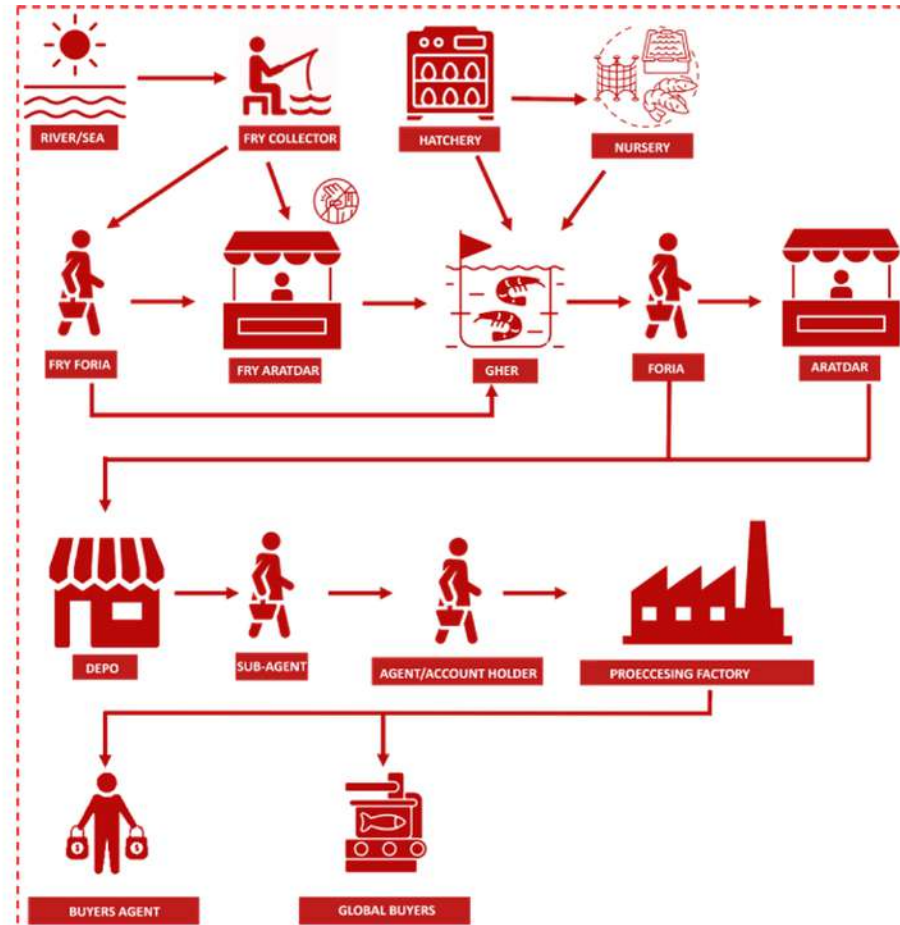
Employment Category	Frequency (n)
Processing – Permanent	160
Processing – Contractual	63
Processing – Third Party	63
Depot – Contractual	47
Depot – Third Party	45
Total	378

Image: Surveyed coverage



5. SHRIMP INDUSTRY LANDSCAPE

5.1 VALUE CHAIN MAPPING



5. SHRIMP INDUSTRY LANDSCAPE

Table. Sources of Raw Shrimp Procurement among Surveyed Depots (Multiple Responses, n = 33)

Source of Shrimp Procurement	Number of Depots (n)	Percent of Depots (%)
Middlemen (Foria)	28	84.8
Other farmers	18	54.5
Auction market	17	51.5
Depot	9	27.3
Marine catch (sea)	6	18.2
Contract farmers	5	15.2
Company collection centre	4	12.1
Own farm	1	3.0

Table. Sources of Shrimp Procurement among Surveyed Shrimp Processing Factories (Multiple Responses, n = 33)

Source of Shrimp Procurement	Number of Factories (n)	Percent of Factories (%)
Depot/Collection centre	24	72.7
Middlemen (Foria)	17	51.5
Auction market	11	33.3
Marine catch (sea)	9	27.3
Other farmers	8	23.5
Contract farmers	4	12.1
Company collection centre	4	12.1
Own farm	2	6.1

5. SHRIMP INDUSTRY LANDSCAPE

Table. Membership in Industry and Business Associations among Shrimp Processing Firms (n = 33)

Association Membership	Number of Firms (n)	Percentage (%)
Not a member	9	27.3
Bangladesh Frozen Foods Exporters Association (BFFEA)	15	45.5
Bangladesh Marine Fisheries Association (BMFA)	8	24.2
Cox's Bazar Chamber of Commerce and Industry	1	3.0
Total	33	100.0

Table. Trade Association Membership among Surveyed Depots (n = 33)

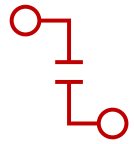
Trade Association	Number of Depots (n)	Percentage (%)
Shrimp Merchants Association	6	18.2
Sonali Jantrik Co-operative Society	4	12.1
Cox's Bazar Fish Market Fishermen's Cooperative Society	2	6.1
Rupsha Shrimp Traders Association	2	6.1
Bangladesh Fisheries Development Corporation	1	3.0
Banik Somittee	1	3.0
Bangladesh Frozen Foods Exporters Association (BFFEA)	1	3.0
Marine Association (Suppliers' Agent Association)	1	3.0
Motso Arot Somittee	1	3.0
Shrimp Traders Association	1	3.0
Suppliers Association	1	3.0
Not a member	12	36.4
Total	33	100.0

5. SHRIMP INDUSTRY LANDSCAPE

Table : International Buyers of Shrimp from Processing Factories Surveyed

List of names		
Co-Processor Seafood	Kyokuyo Co. Ltd.	Pacific Sea (USA)
Food Connection	Lemgo Sea Food	Panafesca Rodkajo
Glacier Sea Food	MAFCO Japan Sea Food	Seafood Connection
Gol Meid Sea Process	Marubeni	World Fish
Hunan Pilot	Maruha Co.	Koyo
Fuzi Corporation	Mitsubishi	Fishermen Choice

5. SHRIMP INDUSTRY LANDSCAPE



The shrimp value chain can be characterised by a highly fragmented, multi-tiered structure, comprising approximately eight to nine intermediary stages before products reach the processing factory.



This proliferation of intermediary tiers presents a significant structural challenge to traceability and labour oversight.



The challenge is further compounded by the fact that many intermediary actors, particularly foria, aratdar, and sub-agents, operate as individual, unregistered economic agents rather than formal enterprises.



The involvement of buying agents can either strengthen or weaken labour oversight. In some cases, they are contractually responsible for conducting social compliance monitoring on behalf of buyers. In others, their role is limited to commercial functions, such as price negotiation and logistics, leaving no clear actor responsible for monitoring labour conditions.

5. SHRIMP INDUSTRY LANDSCAPE

5.2 OWNERSHIP PATTERN

Table. Ownership Status of Premises by Company Type

Type of Premises	Shrimp Processing (n = 33)	Depot (n = 33)	Total (n = 66)
Self-owned building	29 (87.9%)	8 (24.2%)	37 (56.7%)
Rented building	4 (12.1%)	25 (75.8%)	29 (43.3%)
Total	33 (100.0%)	33 (100.0%)	66 (100.0%)

Table. Type of Ownership by Company Type

Ownership Type	Shrimp Processing (n = 33)	Depot (n = 33)	Total (n = 66)
Sole proprietorship	14 (42.4%)	21 (63.6%)	35 (53.7%)
Partnership	4 (12.1%)	11 (33.3%)	15 (22.4%)
Private limited	10 (30.3%)	0 (0.0%)	10 (14.9%)
Public limited	1 (3.0%)	0 (0.0%)	1 (1.5%)
Joint venture	4 (12.1%)	1 (3.0%)	5 (7.5%)
Total	33 (100.0%)	33 (100.0%)	66 (100.0%)

5. SHRIMP INDUSTRY LANDSCAPE

5.3 MARKET FEATURES

Table . Market Orientation of Shrimp Processing Firms (Multiple Responses, n = 33)

Market Orientation	Number of Firms (n)	% of Firms
100% export-oriented	26	74.3
Both domestic and export markets	8	22.9
Sell to processing factories	1	2.9

Table. Export Destinations of Shrimp Processing Firms (Multiple Responses, n = 33)

Export Destination	Number of Firms (n)	% of Firms
European Union	24	72.7
Japan	24	72.7
China	11	33.3
UK	10	30.3
USA	9	27.3
Russia	6	18.2
India	3	9.1
Singapore and Malaysia	3	9.1
Other destinations	6	18.2

5. SHRIMP INDUSTRY LANDSCAPE

5.4 PRODUCTS

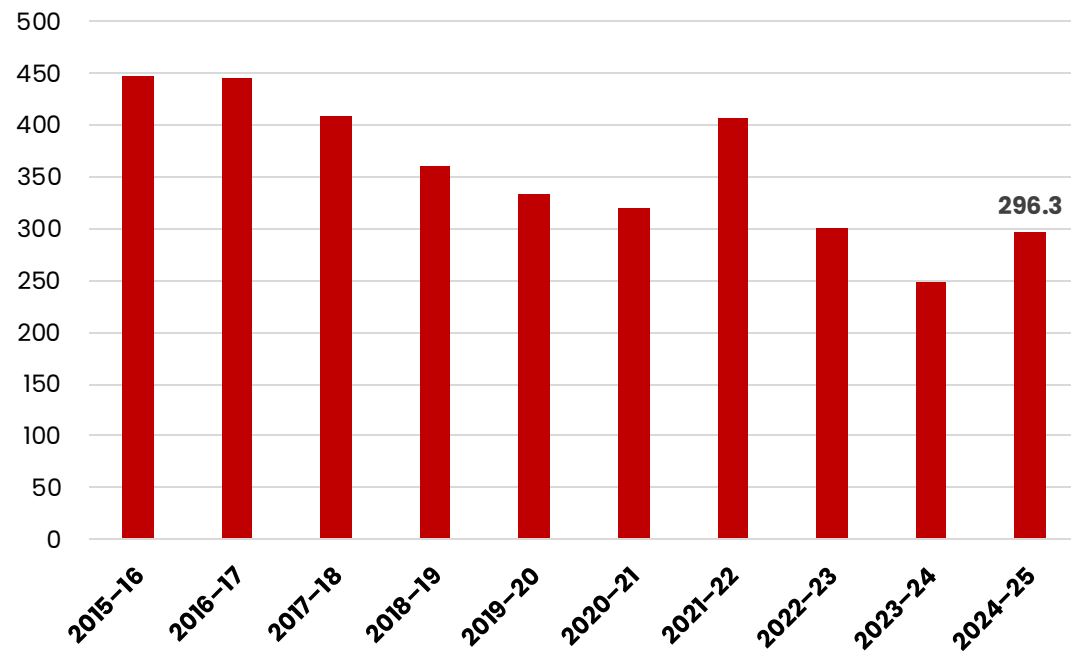
Table. Shrimp Species Processed by Surveyed Shrimp Processing Firms (Multiple Responses, n = 33)

Shrimp Species	Local Name	Number of Firms (n)	% of Firms
<i>Penaeus monodon</i>	Bagda	29	93.5
<i>Macrobrachium rosenbergii</i>	Golda	19	61.3
White shrimp (<i>Penaeus setiferus</i>)	Shada Chingri	15	48.4
Pink shrimp	Golapi Chingri	14	45.2
Brown shrimp (<i>Farfantepenaeus aztecus</i>)	Badami Chingri	13	41.9
<i>Litopenaeus vannamei</i>	Vannamei Chingri	7	22.6
Others	N/A	2	6.5

5. SHRIMP INDUSTRY LANDSCAPE

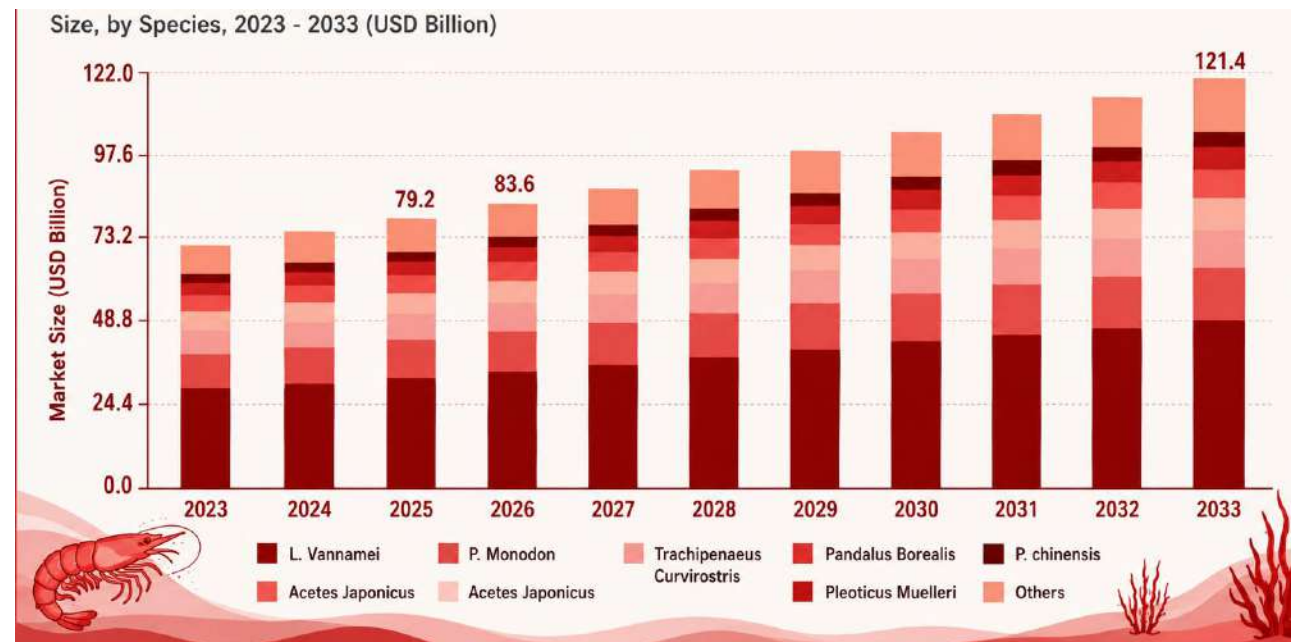
5.5 MARKET PERFORMANCE

Figure: Shrimp Export of Bangladesh



Source: EPB

Figure: Prospects of the Global Shrimp Industry



Source: Grand View Research

5. SHRIMP INDUSTRY LANDSCAPE



The shrimp value chain remains vulnerable, as depots, the main procurement channel, are largely informal, operate from rented premises, and have limited legal accountability despite handling most raw material.



The industry is highly export-dependent, with the EU, Japan, the UK, and the US serving as major markets. As a result, compliance with international human rights and supply chain due diligence requirements is becoming increasingly important.



Production is heavily concentrated in indigenous shrimp species (Bagda and Golda), while adoption of the more competitive species could be explored, subject to less harm to the environment



Bangladesh's shrimp exports have declined despite growing global demand, suggesting limited competitiveness is undermining long-term market access and export performance.

5. SHRIMP INDUSTRY LANDSCAPE

5.6 WORKFORCE

Table: Workforce Distribution in the surveyed factories

Category	Processing Factory		Depo	
	Male	Female	Male	Female
Permanent (Mean)	89	52	15	3
Contractual (Mean)*	45	20	5	13

*(Not via third Party)

Table. Enterprises Contracting Work to Contractors (Third Party) by Company Type

Company Type	Contract Work to Contractors, n (%)	Total (n)
Shrimp processing	6 (18.2)	33
Depot	3 (9.1)	33
Overall	9 (13.4)	66

5. SHRIMP INDUSTRY LANDSCAPE

Table: Youngest Employee Age Group in Surveyed Shrimp Processing Factories

Age Group (Years)	Frequency	Percent
Below 18	3	9.1
18–20	26	78.8
21–22	4	12.1
Total	33	100.0

Table: Youngest Employee Age Group in Surveyed Shrimp Depots

Youngest worker's age (years)	Frequency (n)	Percentage (%)
14–15	3	9.1
16–17	1	3.0
18–20	12	36.4
21–25	7	21.2
26–30	3	9.1
31–35	3	9.1
36–40	3	9.1
41–45	1	3.0
Total	33	100.0

5. SHRIMP INDUSTRY LANDSCAPE



While women represent a reasonable share of permanent workers in processing factories, they are overwhelmingly concentrated in contractual positions in depots



Depots combine multiple labour governance risks. They rely more heavily on contractual labour than processing factories, are largely informal businesses,



Reported contractual workers exclude those hired through third-party contractors, although 13.4% of surveyed firms use such arrangements, particularly processing factories

6. LABOUR RIGHTS PRACTICES

6.1 DEMOGRAPHY (PERMANENT WORKERS)

Table. Highest Level of Education of Respondents (N = 160)

Education Level	Frequency (n)	Percentage (%)
No formal education (can't read or write)	30	18.8
No formal education (can read and write)	13	8.1
Primary (up to Class 5)	57	35.6
Less than SSC	45	28.1
SSC	10	6.3
HSC	3	1.9
More than Bachelor's	1	0.6
Religious education	1	0.6
Total	160	100.0

Table. Descriptive Statistics of Travel Time to the Workplace (Minutes)

Statistic	Value
Mean	14.29

Table. Respondents' Age (Years)

Statistic	Value
Mean	32.31
Minimum	14
Maximum	66

6. LABOUR RIGHTS PRACTICES

6.1 DEMOGRAPHY (PERMANENT WORKERS)

Table. Respondents' Average Monthly Household Balance (BDT)

Statistic	Value (BDT)
Family Income	19,972.50
Family Expenditure	18,349.38
Family Loan	54,792.31
Family Savings	13,425.58

Table. Household Assets Owned by Respondents (Multiple Responses Allowed)

Asset Type	Frequency (n)	Respondents (%)
Gold	93	58.1
Piece of land	68	42.5
House/apartment/residential property	66	41.3
DFS/MFS/Cash savings	52	32.5
Livestock/poultry/fishery assets	15	9.4
Vehicle	10	6.3
None of the above	18	11.3

6. LABOUR RIGHTS PRACTICES

6.1 DEMOGRAPHY (CONTRACTUAL PROCESSING WORKERS)

Table. Highest Level of Education of Respondents (N = 63)

Education Level	Frequency (n)	Percentage (%)
No formal education (can't read or write)	29	46.03
No formal education (can read and write)	5	7.94
Primary (up to Class 5)	19	30.16
Less than SSC	9	14.29
SSC	1	1.59
Total	63	100.0

Table. Travel Time to the Workplace (Minutes)

Statistic	Value
Mean	16.59

Table. Respondents' Age (Years)

Statistic	Value
Mean	37.76
Minimum	16
Maximum	63

6. LABOUR RIGHTS PRACTICES



Educational attainment is low across the workforce, particularly among contractual workers. This limits workers' ability to understand employment rights, wages, and grievance mechanisms.



The workforce is largely locally recruited. Average travel time is relatively short (14–17 minutes), suggesting that most workers live close to their workplaces.



Labour vulnerabilities are concentrated among contractual workers. Compared with permanent workers, contractual workers are older on average, less educated, and employed in less secure jobs.

6. LABOUR RIGHTS PRACTICES

6.2 WAGE (PERMANENT WORKERS)

Table. Weighted Average Monthly Income of Respondents by Gender and Factory Location (BDT)

Category	Current Income (All Sources)	Current (Shrimp-related) Income	Income at Industry Entry	Income in 2024
Overall				
	9117	8831	5655	7742
Gender				
Male	12,836	11,661	7,977	10204
Female	8,117	8,070	5,031	7035
Location				
Chattogram	9,045	8,963	6,244	7786
Cox's Bazar	10,429	8,301	4,836	7034
Khulna	9,045	8,484	3,726	7815

6. LABOUR RIGHTS PRACTICES

6.2 WAGE (CONTRACTUAL PROCESSING WORKERS)

***Table. Average Monthly Income of Respondents by Gender and Factory Location (BDT)**

Category	Current Income (All Sources)	Current (Shrimp-related) Income	Income at Industry Entry	Income in 2024
Overall				
	7,948	7,717	5,024	5,544
Gender				
Male	16,000	16,000	6,500	13,000
Female	7,684	7,446	4,975	5,300
Location				
Chattogram	10,238	10,123	6,965	4,823
Cox's Bazar	6,000	6,000	5,667	3,634
Khulna	6,368	6,029	3,482	6,265

6. LABOUR RIGHTS PRACTICES

6.2 WAGE (PERMANENT WORKERS)

Table. Respondents Earning Below the Minimum Wage (Weighted Estimates)

Monthly Wage Category	Percentage (%) 2026	Percentage (%) 2024
Below minimum wage	5.6	29.1
At or above minimum wage	94.4	70.9
Total	100.0	100.0

Table. Respondents' Expected Monthly Wage from Their Current Job (BDT) (Weighted Estimates)

Statistic	Value (BDT)
Mean	12,698.20
Minimum	7,500
Maximum	25,000

6. LABOUR RIGHTS PRACTICES

6.2 WAGE (PERMANENT WORKERS)

Table. Job Grade of Respondents

Job Grade	Frequency (n)	Percentage (%)
Don't know their grade	155	96.9
Grade 2	3	1.9
Grade 4	2	1.3
Total	160	100.0

Table: Receipt of Government Social Allowances

Government Allowance Status	Frequency (n)	Percentage (%)
No	157	98.1
Yes	3	1.9
Total	160	100.0

Table. Awareness of the Industry's Minimum Wage (Weighted Estimates)

Awareness	Percentage (%)
No	92.9
Yes	5.7
Partial	1.4
Total	100.0

6. LABOUR RIGHTS PRACTICES

6.2 WAGE (CONTRACTUAL PROCESSING WORKERS)

Table. Receipt of Government Social Allowances Among Respondents (N = 63)

Government Allowance Status	Frequency (n)	Percentage (%)
No	55	87.3
Yes	8	12.7
Total	63	100.0

Table. Awareness of the Industry's Minimum Wage (Weighted Estimates)

Awareness	Percentage (%)
No	90.48
Yes	9.52
Total	100.0

6. LABOUR RIGHTS PRACTICES

6.2 WAGE (PERMANENT WORKERS)

Table. Overtime Rate per Hour

Statistic	Value (BDT/hour)
Mean	48.08
Minimum	25
Maximum	90

Table. Access to Digital and Mobile Financial Service Accounts
(Weighted Estimates)

Account Type	Respondents (%)
Have Self MFS Account	48.2
None	39.8
Have Self DFS Account	15.5

Table. Primary Mode of Wage Payment (Weighted Estimates)

Mode of Wage Payment	Currently receiving (%)	Preferred by (%)
Cash	77.4	76.6
Mobile Financial Services	16.5	8.2
Digital Financial Services	6.1	15.2
Total	100.0	100.0

6. LABOUR RIGHTS PRACTICES

6.2 WAGE (PERMANENT WORKERS)

Table. Employment Benefits Received by Respondents (Multiple Responses Allowed, Weighted Estimates)

Employment Benefit	Respondents (%)
Eid/Religious Festival Bonus	97.1
One day weekly leave	68.7
Yearly increment	24.8
Yearly 5% salary increase	6.1
Two days weekly leave	4.3
Attendance bonus	3.9
Health insurance	1.4
Others	1.3
New Year bonus	0.6
Production target bonus	0.4
Provident fund	0.4
None	0.3

6. LABOUR RIGHTS PRACTICES

6.2 WAGE (PERMANENT WORKERS)

Table. Time Since Last Promotion (Months)

Statistic	Value (Months)
Mean	69.48
Minimum	1
Maximum	360

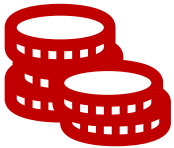
Table. Receipt of Wage-related Training During Working Life
(Weighted Estimates)

Response	Percentage (%)
No	95.1
Yes	4.9
Total	100.0

6. LABOUR RIGHTS PRACTICES



Significant wage inequality persists. Contractual workers earn less than permanent workers, and women earn substantially less than men in both groups. The gender pay gap is particularly severe among contractual workers, where female earnings are less than half of male earnings.



Minimum wage compliance has improved, but wage awareness and adequacy remain low. The proportion of permanent workers earning below the minimum wage has fallen sharply, yet most contractual workers are unaware of the legal minimum wage, and workers' expected wages remain well above their current earnings.



Formal labour protections remain limited. Cash is the dominant payment method despite growing interest in digital payments. Many workers lack digital financial accounts, social protection benefits, regular career progression, and key employment benefits such as health insurance, provident funds, and consistent weekly rest days.

6. LABOUR RIGHTS PRACTICES

6.3 OSH (PERMANENT WORKERS)

Table. Average daily work hours (Weighted Estimates)

Statistic	Value (Months)
Average daily workhours	8.79
Minimum	6
Maximum	15

Table. PPE-related measures (in percentage)

Indicator	% of Workers
Available/ Use PPE	97.6
Received training on PPE use	54.2
Received order to use PPE	93.3

Table. Number of Working Days per Week (Weighted Estimates)

Working Days per Week	Percentage (%)
5 days	1.5
6 days	70.8
7 days	27.8
Total	100.0

Table. Chemical-related measures (in percentage)

Indicator	% of Workers
Received training on chemical safety	57.6
Aware about the steps of chemical spilling	58.1
Understand chemicals labelling	78.7

6. LABOUR RIGHTS PRACTICES

6.3 OSH (PERMANENT WORKERS)

Table. OSH-Related Indicators (Weighted Estimates)

Indicator	% of Workers
Gets regular breaks from cold work	80.8
Felt pain (injured) due to the cold	78.8
Found floor excessively slippery/wet	81.3

Table. OSH-Related Indicators (Weighted Estimates)

Indicator	% of Workers
Received workplace safety training	35.1
Have first aid box at workplace	59.1
Know who is first aider	47.2
Have dedicated doctor	31.7
Receive treatment quickly if accident takes place	61.3
Know steps in case of fire or emergency	39.2
Feels safe about complaining on safety issues	70.6
Have safety committee in factory	88.3

Table. OSH-Related Indicators (Weighted Estimates)

Indicator	% of Workers
Accidents reported by employers	13.3
Machine have guards and emergency stops	65.3
Received training on using machine	26.0

Table. OSH-Related Indicators (Weighted Estimates)

Indicator	Mean
Number of accidents witnesses in 2025	3.90

Indicator	% of Workers
Witnessed a workplace death	15.5
Have health insurance at Workplace	16.1

6. LABOUR RIGHTS PRACTICES

6.3 OSH (PERMANENT WORKERS)

Table. Work related injuries Experienced by Respondents (Weighted Estimates)

Type of Occupational Accident	Respondents (%)
Slips on wet or icy floors	66.4
Wrist, shoulder, or finger injury from repetitive work	53.2
Knife cuts during peeling and de-heading	37.0
Cuts from shrimp shell, tail, or broken crates	32.6
Finger or hand injury from peeling/grading machines	25.5
Cold-related injury from ice or cold rooms	24.5
Falls from stairs, ramps, docks, or platforms	20.5
Ice crusher or conveyor belt injuries	13.6
Injury during loading/unloading or transport of shrimp	12.8
Back injury from lifting ice boxes or crates	12.5
Electric shock in wet working areas	10.0
None	4.8
Chemical splash or burn (chlorine/disinfectants)	3.1
Others	0.5

6. LABOUR RIGHTS PRACTICES

6.3 OSH (PERMANENT WORKERS)

Table. Occupational Diseases Experienced by Respondents

Occupational Disease	Respondents (%)
Skin infection or allergy from prolonged water contact	45.3
Back pain (lower and upper)	45.1
Allergic skin reactions	36.5
Breathing problems from chemical fumes	28.6
Didn't catch any disease	28.7
Contact dermatitis	14.1
Pneumonia	9.3
Fungal skin infections	7.5
Occupational asthma	4.1
Noise-induced hearing loss	1.8

6. LABOUR RIGHTS PRACTICES

6.3 OSH (PERMANENT WORKERS)

Table. Occupational accidents experienced by respondents

Worker category	1st most reported	2nd most reported	3rd most reported
Processing – Permanent	Slips on wet/icy floors 66.6%	Wrist, shoulder, or finger injury 53.2	Knife cuts 37.0%
Processing – Contractual	Slips on wet/icy floors 68.3%	Wrist, shoulder, or finger injury 52.4	Knife cuts 44.4%
Processing – Third Party	Slips on wet/icy floors 65.1%	Knife cuts 46.0%	Wrist, shoulder, or finger injury 42.9
Depot – Contractual	Slips on wet/icy floors 61.7%	Shell/tail/crate cuts 46.8%	Wrist, shoulder, or finger injury 46.8
Depot – Third Party	Slips on wet/icy floors 64.4%	Knife cuts 42.2%	Shell/tail/crate cuts 42.2%

Table. Occupational diseases experienced by Respondents

Worker category	1st most reported	2nd most reported	3rd most reported
Processing – Permanent	Skin infection from water 45.3%	Back pain 45.1%	Allergic skin reaction 36.5%
Processing – Contractual	Allergic skin reaction 60.3%	Skin infection from water 52.4%	Back pain 46.0%
Processing – Third Party	Allergic skin reaction 46.0%	Back pain 41.3%	Skin infection from water 27%
Depot – Contractual	Allergic skin reaction 48.9%	Back pain 46.8%	Skin infection from water 40.4%
Depot – Third Party	Allergic skin reaction 48.9%	Contact dermatitis 37.8%	Skin infection from water 37.8%

6. LABOUR RIGHTS PRACTICES



Working hours and occupational hazards remain major concerns. While average daily working hours are within normal limits, over one-quarter of workers report working seven days a week without a weekly rest day. Cold exposure, slippery floors, and inadequate machine safety continue to pose significant occupational health and safety risks.



Safety measures exist, but worker preparedness is limited. PPE is widely available, yet only about half of workers receive PPE or chemical safety training. Safety committees are common, but knowledge of emergency procedures, first aid, and machine operation remains low, indicating gaps between formal compliance and effective implementation



Workplace accidents appear to be substantially underreported. Employer-reported accident rates are much lower than workers' reported experiences, including reports of workplace fatalities. This suggests weak safety reporting systems and highlights the need for stronger accountability, worker awareness, and effective grievance mechanisms

6. LABOUR RIGHTS PRACTICES

6.4 CHILD & FORCED LABOUR (PERMANENT WORKERS)

Table. Summary of Child Labour and Forced Labour Indicators

Indicator	Key Finding
Workers reportedly under 18 known by respondents (mean)	9.82 workers
Workers who joined the workplace while under 18 (mean)	12.72 workers
Asked to provide birth certificate/NID/school certificate before recruitment	88.2% Yes
Children assisting family members during working hours	7.7% Yes
Experienced threats for refusing to work	17.5% Yes
Forced to work overtime against their will	15.3% Yes
Witnessed a workplace death due to occupational accidents	15.5% Yes

6. LABOUR RIGHTS PRACTICES

6.4 CHILD & FORCED LABOUR (COMPARISION)

Table. Workers are asked to show a birth certificate, National ID (NID), or school certificate before recruitment

Employment Category	Yes (%)
Processing – Permanent	88.2
Processing – Contractual	44.4
Processing – Third Party	41.3
Depot – Contractual	10.6
Depot – Third Party	13.3

Table. Involvement of Respondents' Children in the Shrimp Industry

Employment Category	Yes (%)
Processing – Permanent	18.5
Processing – Contractual	29.3
Processing – Third Party	13.2
Depot – Contractual	27.3
Depot – Third Party	31.0
Total	22.3

6. LABOUR RIGHTS PRACTICES

6.4 CHILD & FORCED LABOUR (COMPARISION)

Table. Age of workers when they entered their current job

Employment Category	Indicator	Value
Processing – Permanent	Minimum	12
	Max	54
Processing – Contractual	Minimum	11
	Max	58
Processing – Third Party	Minimum	13
	Max	55
Depot – Contractual	Minimum	7
	Max	62
Depot – Third Party	Minimum	6
	Max	59

6. LABOUR RIGHTS PRACTICES



Age verification is weakest in the most informal parts of the supply chain. While most permanent processing workers undergo age verification before recruitment, this practice is rare among depot workers, creating a significant risk of underage recruitment and highlighting a major governance gap



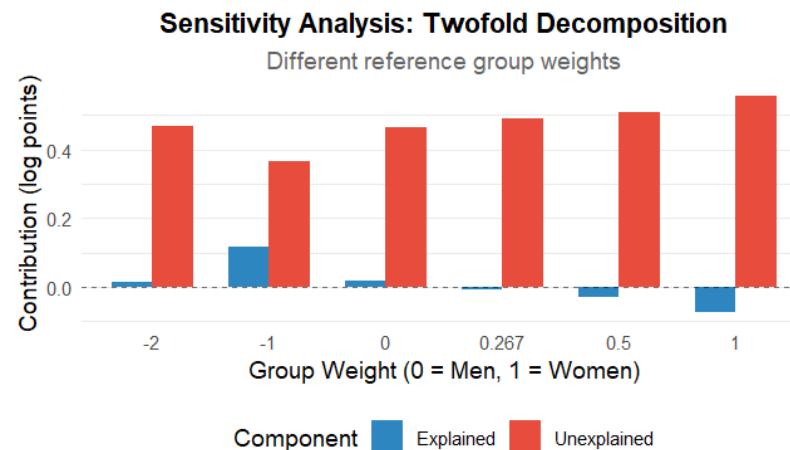
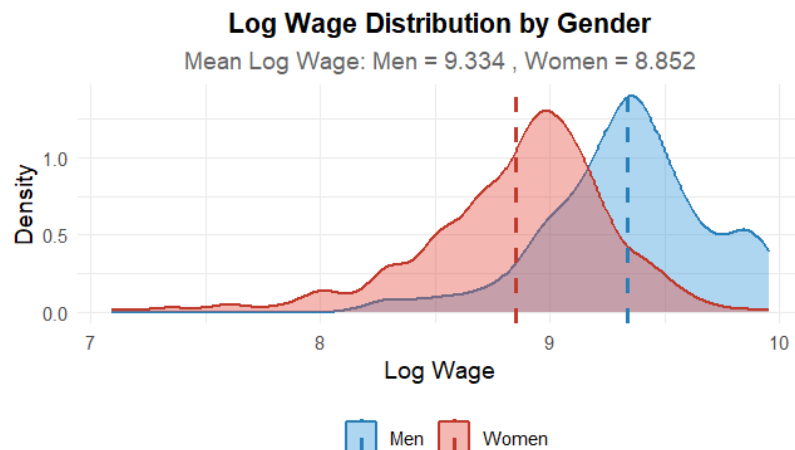
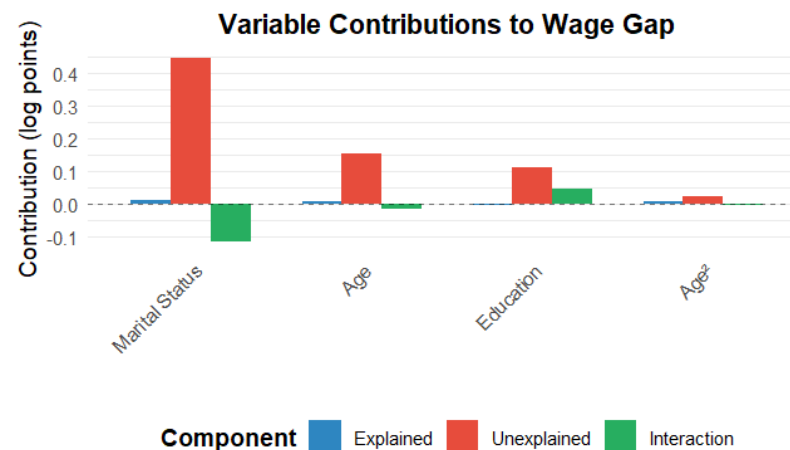
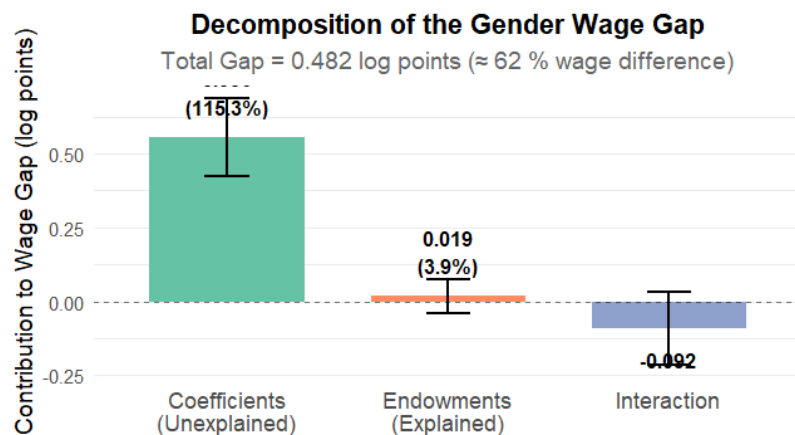
Evidence suggests child labour remains a concern. Workers reported knowing under-18 workers in the sector, and some reported children assisting family members at work, indicating the need for stronger child labour prevention and monitoring, particularly in informal production and depot settings



Formal employment documentation remains limited. Only 20% of permanent workers reported receiving an appointment letter after joining their workplace, while 80% had not, suggesting scope to strengthen formal employment documentation and employment record-keeping.

6. LABOUR RIGHTS PRACTICES

6.5 GENDER EQUALITY (OVERALL)



6. LABOUR RIGHTS PRACTICES

6.5 GENDER EQUALITY (OVERALL)

Table. Gender based wage decomposition: Oaxaca-Blinder approach

Metric	Value	Interpretation
Overall wage gap		
Raw log-wage gap	0.482	Men earn approximately 62% more than women, on average
Raw wage gap (levels)	BDT 4,444.00	Men earn BDT 4,444 more per hour, on average
Threefold decomposition		
Explained (characteristics)	0.0187 (3.9%)	Only 3.9% of the gap is due to differences in characteristics
Unexplained (returns)	0.5560 (115.3%)	The majority of the gap is due to differences in returns
Interaction	-0.0923 (-19.1%)	The interaction effect partially offsets the gap

6. LABOUR RIGHTS PRACTICES

6.5 GENDER EQUALITY (PERMANENT WORKERS)

Table. Summary of Gender Equality, Maternity Protection, Childcare and Workplace Harassment Indicators

Indicator	Key Finding
Aware of maternity leave entitlement	84.3% Yes
Received maternity leave during pregnancy other workers	69.9% Yes
Asked to undergo a pregnancy test before hiring/promotion	7.6% Yes
Witnessed coworkers being pressured to resign due to pregnancy	6.5% Yes
Afraid to speak to supervisor	12.7% Yes
Workplace provides childcare (daycare)	13.3% Yes
Childcare available in the local area	0.1% Yes
Would prefer workplace childcare if provided	100.0% Yes
Would prefer community/local childcare if provided	100.0% Yes
Safe, private place for breastfeeding available*	25.8% Yes
Experienced unfair treatment due to gender	5.3% Yes
Experienced verbal abuse related to gender/family status	6.7% Yes
Asked for sexual favours in exchange for work/overtime/promotion	1.3% Yes
Witnessed sexual harassment of coworkers	5.4% Yes
Workers shouted at, insulted, or humiliated by supervisors	26.6% Yes
Workplace has an anti-sexual harassment committee	17.9% Yes
Know how to file a harassment complaint	57.1% Yes
Ever lodged a harassment complaint	6.5% Yes
Complaint resulted in the expected outcome	3.9% Yes

6. LABOUR RIGHTS PRACTICES

6.5 GENDER EQUALITY (PERMANENT WORKERS)

Table. Summary of availability of child-care services

Company type	Child-care services available, n	%
Shrimp processing	20	60.6
Depot	0	0.0

6. LABOUR RIGHTS PRACTICES



Maternity protection and gender equality measures require strengthening. While awareness of maternity leave is high, implementation is not universal, and some workers reported pregnancy-related discrimination.



Support for working mothers remains limited. Childcare services and breastfeeding facilities are scarce despite strong demand from workers.



Workplace grievance mechanisms need improvement. Reports of harassment and verbal mistreatment, together with limited anti-sexual harassment committees and low confidence in complaint resolution, indicate gaps in workplace protection and accountability.

6. LABOUR RIGHTS PRACTICES

6.6 FREEDOM OF ASSOCIATION (PERMANENT WORKERS)

**Table. Trade Union Membership Status
(Weighted Estimates)**

Response	Percentage (%)
No Trade Union	44.8
No	39.5
Yes	15.8
Total	100.0

Table. Fear of Retaliation for Joining a Trade Union

Response	Percentage (%)
No	73.3
Yes	26.7
Total	100.0

**Table. Workers' Freedom of Association: Right to Form or Join a
Trade Union (Weighted Estimates)**

Response	Percentage (%)
No	58.4
Yes	41.6
Total	100.0

**Table. Workers Dismissed, Transferred, or Punished for Union
Activities**

Response	Percentage (%)
No	84.8
Yes	15.2
Total	100.0

6. LABOUR RIGHTS PRACTICES

6.6 FREEDOM OF ASSOCIATION (PERMANENT WORKERS)

Table. Workers can Meet Outside the Workplace Without Management Approval

Response	Percentage (%)
No	52.6
Yes	47.4
Total	100.0

Table. Management Interference in the Selection of Worker Representatives

Response	Percentage (%)
No	89.1
Yes	10.9
Total	100.0

Table. Worker Consultation on Wage Increases, Working Hours and Overtime Decisions

Response	Percentage (%)
No	75.3
Yes	24.7
Total	100.0

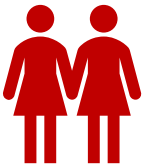
6. LABOUR RIGHTS PRACTICES



Worker representation remains limited. Trade union membership is low (15.8%), many workplaces have no trade union, and only a small share of workers reported being consulted on decisions related to wages, working hours, and overtime.



Some workers reported barriers to freedom of association. Around one-quarter expressed fear of retaliation for union-related activities, while others reported restrictions on meeting outside the workplace or adverse actions linked to union activities.



Worker voice mechanisms could be strengthened. Although reported management interference in selecting worker representatives is relatively low, the findings suggest opportunities to improve independent worker representation and meaningful participation in workplace decision-making.

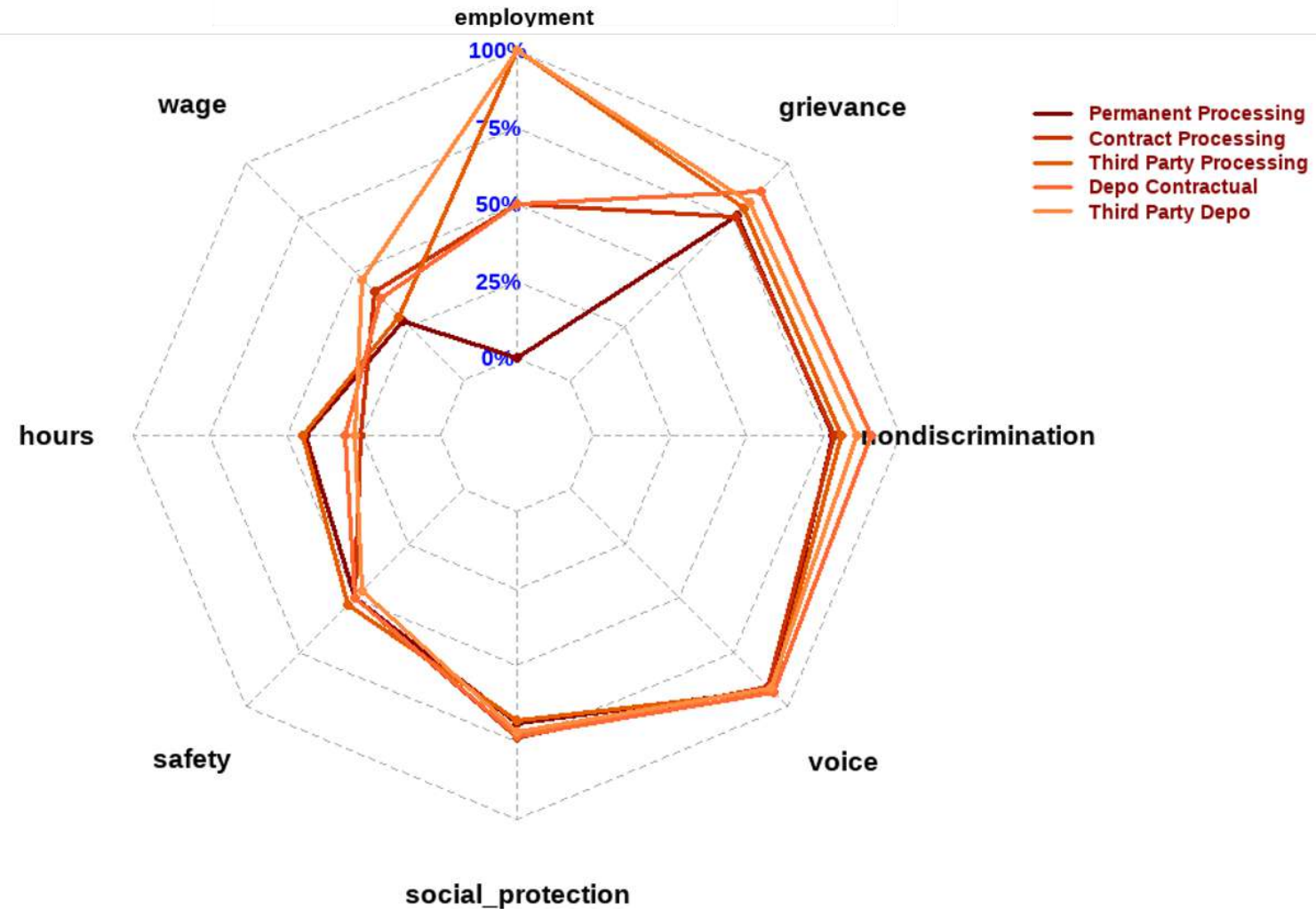
6. LABOUR RIGHTS PRACTICES

Table. Labour Rights Performance by Capacity Group and Enterprise Type

Category	Capacity Group	N	Governance	Practice	Accountability	LRPI	Policy–Practice Gap	Kruskal–Wallis (p)
Shrimp processing	High	11	87.5	90.0	100.0	92.5	–2.5	0.015*
	Medium	10	79.2	84.2	90.0	84.5	–5.1	
	Low	11	71.0	70.7	86.4	76.0	+0.4	
Depot	High	11	51.1	89.8	54.5	65.2	–38.7	0.015*
	Medium	10	50.4	56.8	57.5	54.9	–6.4	
	Low	12	29.7	52.9	60.4	47.7	–23.2	

6. LABOUR RIGHTS PRACTICES

Dimension Vulnerabilities by Employment Type



7. RECOMMENDATIONS

1. STRENGTHENING COMPETITIVENESS & TRACEABILITY

- ❑ **Strengthen outcome-oriented research on the declining availability of shrimp fry and raw materials.** The Bangladesh Fisheries Research Institute (BFRI), Shrimp Research Station, and other relevant government institutions should jointly undertake systematic research to identify the biological, environmental, climatic, market and institutional factors contributing to the depletion of shrimp fry and the declining availability of raw materials for the industry.
- ❑ **Promote value-chain integration between processing factories and depots.** Shrimp processing enterprises should be encouraged to establish and operate dedicated depots or integrated procurement networks to improve traceability, supply reliability, quality control and coordination across the value chain.
- ❑ **Undertake feasibility and cost-benefit assessments for higher-value shrimp production.** Detailed research should assess the technical, economic and market feasibility of producing vannamei and other higher-value shrimp varieties, particularly in areas with potential for export-oriented production. Such assessments should consider environmental sustainability, biosecurity, production costs, export demand and potential employment effects.
- ❑ **Promote on-board shrimp processing and develop dedicated labour-rights guidelines.** The government and relevant industry stakeholders should promote expanding on-board shrimp processing to improve product quality, reduce post-harvest losses and enhance value addition. Given the distinct working conditions and occupational risks associated with vessel-based processing, a dedicated regulatory and labour-rights framework should be developed covering working hours, wages, occupational safety and health, accommodation, food and water, access to grievance mechanisms, freedom of association, and protection against forced labour and other forms of exploitation.
- ❑ **Establish dedicated shrimp industry zones where feasible.** The government should assess the feasibility of establishing specialised zones or common facilities for shrimp depots and processing enterprises, particularly in major shrimp-producing clusters, to improve infrastructure, logistics, quality control, waste management and access to essential services.

7. RECOMMENDATIONS

- ❑ **Introduce improved raw-material inspection and quality-control systems.** The government should facilitate the installation of appropriate inspection and quality-control equipment, including gate-level inspection technologies where technically feasible, at shrimp processing facilities to improve the detection of substandard or contaminated raw materials.
- ❑ **Strengthen border control against illegal shrimp capturing.** Provide specialised training and operational support to the Bangladesh Coast Guard and other relevant enforcement agencies to improve their capacity to detect and prevent the illegal capture and movement of shrimp and related products.
- ❑ **Introduce a simplified and unified registration mechanism.** A single-window registration process should be developed for informal actors, particularly small depots and other intermediaries, with appropriate incentives to encourage formal registration and facilitate systematic mapping of actors throughout the shrimp value chain.
- ❑ **Establish a dedicated registration framework for third-party labour providers.** Labour contractors and third-party worker-supply agencies should be subject to a transparent registration and monitoring system to improve accountability and prevent labour-rights violations.
- ❑ **Establish a common association of shrimp depots.** A representative common association should be developed for depot operators to facilitate collective representation, dissemination of regulatory information, capacity building, industry coordination and engagement with government and other stakeholders.
- ❑ **Develop a comprehensive database of the shrimp industry's workforce.** Relevant government institutions should incorporate shrimp-sector workers into national labour-market and worker databases to improve labour-market monitoring, policy formulation and enforcement.
- ❑ **Develop regulatory arrangements for highly seasonal enterprises.** Labour and business regulations should recognise the operational characteristics of highly seasonal industries while maintaining core labour rights and employment protections. A dedicated regulatory framework may be developed to address seasonal recruitment, working hours, temporary employment and social protection.

7. RECOMMENDATIONS

2. WAGE, EMPLOYMENT STANDARDS AND SOCIAL PROTECTION

- ❑ **Ensure appointment letters for all workers.** All workers, irrespective of employment status, including permanent, temporary, contractual and third-party workers, should receive written appointment letters or equivalent employment documentation specifying their terms and conditions of employment.
- ❑ **Strengthen workers' understanding of wages and wage grades.** Regular training should be organised for workers and employers on minimum wage provisions, wage grades, wage calculation and applicable employment benefits to improve compliance and workers' ability to claim their entitlements.
- ❑ **Announce new minimum wage board:** Announce a new minimum wage board for the shrimp industry to review and revise the sector-specific minimum wage, taking into account workers' current cost of living, wage disparities, occupational risks, and the specific conditions of permanent, contractual and third-party workers.
- ❑ **Review minimum wages in light of household needs.** Future minimum-wage reviews should incorporate evidence on the cost of living and household expenditure, including the costs associated with children's education, while maintaining a transparent and evidence-based wage-setting mechanism.
- ❑ **Strengthen social protection for workers' children.** The Labour Welfare Fund and other appropriate social-protection mechanisms should be utilised to provide educational support for school-going children of workers in the shrimp industry, along with those who are at university.
- ❑ **Improve access to financial services and investigate barriers to MFS use.** Relevant authorities and industry stakeholders should investigate the reasons for limited or uneven use of mobile financial services (MFS) for wage payments and develop measures to ensure accessible, transparent and secure digital wage-payment mechanisms without imposing additional costs on workers.

7. RECOMMENDATIONS

3. OCCUPATIONAL SAFETY AND HEALTH

- ❑ **Improve workplace floor safety.** Processing facilities should maintain dry, clean and non-slip floors and establish routine systems for removing standing water to reduce slips, falls and other workplace injuries.
- ❑ **Strengthen risk-based workplace monitoring through digital technologies.** Labour inspection and occupational-safety monitoring should progressively incorporate AI-supported and data-driven risk assessment tools to identify high-risk establishments and prioritise inspections, while maintaining human oversight and regulatory accountability.
- ❑ **Strengthen occupational-safety systems in processing facilities and depots.** Employers should undertake regular workplace risk assessments, provide appropriate protective measures and ensure that workers receive adequate information and training on occupational hazards.
- ❑ **Introduce task-specific injury prevention:** Factories should therefore introduce task-specific training, appropriate protective equipment, safer knife-handling procedures and ergonomic work arrangements for peeling, de-heading and grading workers.

4. GENDER EQUALITY AND WOMEN'S EMPLOYMENT

- ❑ **Investigate the lower participation of women in formal employment.** Dedicated research should examine the economic, institutional, social, occupational and workplace factors contributing to the relatively lower participation of women in formal employment within the shrimp value chain.
- ❑ **Strengthen measures against gender-based discrimination.** Employers and relevant government agencies should adopt and enforce measures to prevent gender-based discrimination in recruitment, remuneration, promotion, job allocation and working conditions.
- ❑ **Expand quality childcare services.** Access to safe, affordable and quality childcare should initially be ensured in shrimp processing factories, where female employment is relatively concentrated, and gradually extended to other establishments across the value chain.

7. RECOMMENDATIONS

5. CHILD AND FORCED LABOUR

- ❑ **Establish a dedicated child-labour prevention and monitoring mechanism** for the shrimp industry, with priority given to informal depots, contractual employment and third-party recruitment channels where age-verification practices are comparatively weak.
- ❑ **Increase risk-based labour inspections during peak shrimp-processing seasons**, with particular attention to working hours, forced overtime, child labour, wage compliance, occupational safety and third-party workers.
- ❑ **Conduct regular worker inspection on working hours and overtime payments** to independently monitor actual hours worked, overtime hours, overtime compensation and compliance with applicable labour standards, with particular attention to contractual and third-party workers and peak shrimp-processing seasons.

6. INDUSTRIAL RELATIONS AND WORKER REPRESENTATION

- ❑ **Strengthen mechanisms for worker representation and collective voice.** The Department of Labour (DoL) should initiate a dedicated programme for strengthening trade union activities in the shrimp industry, including facilitating the formation and registration of trade unions in eligible shrimp processing establishments, promoting workers' awareness of their rights to freedom of association, and ensuring that workers can organise and participate in collective bargaining without retaliation or interference. Particular attention should be given to contractual and third-party workers, who face greater employment insecurity and weaker representation.
- ❑ **Promote awareness of labour rights and grievance mechanisms.** Employers, workers and third-party labour providers should receive training on workers' rights, grievance procedures, non-retaliation and available institutional mechanisms for resolving workplace disputes.

THANK YOU