



MAPPING AND ANALYSIS OF CHILD LABOUR AND ASSOCIATED STAKEHOLDERS IN SHRIMP FRY COLLECTION IN TARGETED UPAZILAS OF BANGLADESH

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Executive summary

This “Mapping and Analysis of Child Labour and Associated Stakeholders in Shrimp Fry Collection in Targeted Upazila’s of Bangladesh” has been conducted as part of the project named **‘Addressing Child Labour in Agricultural Supply Chains, Global to Local’**, to be implemented by Global March against Child Labour and Bangladesh Shishu Adhikar Forum (BSAF) in three targeted upazilas (Paikgacha and Koira Upazila of Khulna and Soronkhola Upazila of Bagerhat District) of southern Bangladesh.

The overall objective of this mapping is to gain in-depth understanding of the various tiers of the shrimp supply chain in Bangladesh and understand the root causes of child labour from supply-side (push factors) and demand-side (pull factors) at a community level and its significant consequences to inform the project designing evidence-based advocacy strategy and interventions for engaging with the different stakeholders.

Methodological framework: This mapping and analysis mainly used qualitative tools, such as literature review and Key Informant Interviews (KIIs) to collect data and information. In doing so, apart from the primary information collected through KIIs, different available literature on the issue has been reviewed.

A total of 47 KIIs have been conducted with different actors of the supply chain which includes shrimp farmers, shrimp fry collectors, aratdar², faria³, inter district aratdar agents, retailers, and exporters. Besides, representatives of local, national and international non-government organizations working on child rights and on shrimp sector, local government representatives, local and national level government officials, and representatives of inter-state agencies have also been consulted by way of KIIs.

Key findings

Overview of the shrimp sector of Bangladesh

- Unlike the Readymade Garment Sector, the shrimp sector is complicated involving diverse actors. The shrimp sector is politically sensitive as well. There are two streams of thoughts: one group of thought supports commercial shrimp cultivation and another group opposes commercial shrimp cultivation from the perspectives of environmental impact and human rights violations.
- Over the decades, there has been a change in the farm level production of shrimp in terms of land use and ownership. Where large scale farming by the outsiders and local influential groups was the main feature at the beginning of commercial shrimp production, now a majority of the farms are small and medium-size managed by the local farmers. And, in the case of small farming, farmers mostly use their own lands, but medium and large scale farmers use leased land. Government officials, business actors and the NGOs expressed the same opinions on this use.

1 Sub-district
2 middlemen
3 Local agents

- Shrimp cultivation in Bangladesh predominantly depends on traditional farming. Interview with the Senior Technical Officer of the Fisheries Research Centre informs that 90% of farmers are still engaged in traditional farming, whereas 10% are engaged in semi-intensive farming, though an interview with the Vice President of Bangladesh Frozen Foods Exporters Association (BFEEA) based in Khulna informs that only 5% does semi intensive production.
- Bangladeshi shrimp is facing challenges in global markets. The main challenge, as shared by the exporters and government officials from the Department of Fisheries is the high demand for hybrid vannamei from Thailand and Vietnam in global markets mainly for its cheap price. The other challenges of the shrimp business, as shared by the business actors (exporters) are the low productivity of the local species, lack of quality seed, high production cost, lack of adequate supply of raw materials (matured shrimps).
- Processing factories have made progress in quality as well as in labour standards. Processing factories are claimed to be child labour free by all the business actors and the government agencies interviewed as part of this mapping exercise.

Prevalence of child labour in the shrimp supply chain

- Though there are differences of opinion about the volume of children engaged in shrimp fry catching, all the stakeholders interviewed including farmers, business actors, government officials and NGOs confirm the involvement of children in shrimp fry catching.
- The business actors and the government officials interviewed for this mapping purpose reaffirmed that there is no child labour in processing plants now. In their opinions, the government has declared the sector as child labour free, so there is no scope for employing children in the factories. Interviews with the NGO actors also expressed similar views by saying that processing factories and hatcheries are almost child labour free.
- However, several NGOs and local individuals shared in the form of anecdotal evidence that still some factories engage children as contractual workers, but the numbers might not be that huge as compared to the scenario of 10/12 years ago. Several NGOs shared that children are usually engaged as temporary workers during the peak season and this can be observed when the workers walk to the factories or at the factory gate. Another perspective is that- during the visit by the EU or by government authorities, they tactfully remove the children from the work. However, the issue of child labour in the sector has been found very sensitive and particularly the business actors of all layers, farmers and the government officials were found very mindful talking about this issue.
- This is to be noted that there are several other supply chain actors, such as arats, depots, ice manufacturing, transportation, packaging etc. standing in between the fry catching and processing plants. Though a general tendency of denial of engaging children in these layers were observed while interviewing the owners of depots, arats, ice factories, transportation companies, but few of them admitted that sometimes children work in these tiers, but according to them, children are engaged only for short time and do light work.
- The Deputy Inspector General (DIG), Department of Inspection for Factories & Establishments (DIFE) of Khulna viewed that since the work done by the children in depots and other layers of

supply chain except the formal processing factories is not hazardous in nature and the number of children engaged in such works is not that high, they cannot give priority to these layers. **To his opinion, though these sectors are within the formal sectors, but these works are not considered hazardous work, they have a scarcity of human resources and they have to set priorities – where the job is hazardous, and a large volume of children are engaged, export oriented companies etc.**

- Regarding the involvement of children at the farm level activities, two dimensions were found during the interviews with stakeholders. As confirmed by both the government officials and the farmers, in the case of small scale farming, children are engaged along with their parents and other family members to provide support to the family initiatives. There reveals ambiguity among the farmers and the government officials as to how children helping the family work can be considered as child labour.
- In the case of medium and large scale farming, many children are engaged as workers, as shared by local NGOs. According to one NGO official, huge no of children aged 10-12 years' work in gher, along with their mothers. They work for building/repairing embankments, pulling the nets, riding boats, feeding the shrimps, cleaning the thorny shaola (moss) etc. But during interviews with the farmers, some farmers admitted the fact of engaging children and some denied it. Lack of clarity about the definition of children and conceptual clarity about child labour might be the reasons for such opposing views.

Causes and consequences of child labour in shrimp supply chain

- Household poverty** has been cited as the main cause of child labour in the shrimp supply chain. As associated with poverty, other push factors of child labour include sudden illness of the main earning member of the family, lack of adequate social protection services and the opportunity for work in the shrimp sector.
- As shared by all the stakeholders interviewed including government officials, business actors and NGOs, fry catchers are extremely poor people, some of them even don't have permanent shelter. Some are landless, where some have a small piece of homestead land, some are internally migrant (from other upazilas, or from other neighbouring districts) due to climate-induced natural disasters. Apart from shrimp fry catching, they also catch other types of fishes, sometimes they work as day labourers in the shrimp farms as well.
- Interviews with the local NGOs inform that there is a huge wage gap between adults and children. One NGO official shared that if an adult gets 500 takas per day, a child gets 80 takas and sometimes they get only food without any wages. Interviews with farmers, particularly the women farmers and the government official from the Department of Labour Inspection also endorsed the existing wage gap between adult and children.
- Several stakeholders that include government officials, business actors and NGO officials viewed child labour as a **cultural issue**. The children get habituated to this work of fry catching from their very childhoods. On the other hand, the lack of awareness of the parents about the bad effects of child labour and lack of aspirations for education has also been shared as the reasons for child labour in the targeted communities. Interestingly, few stakeholders that include government officials and business actors shared that sometimes children get engaged in work to satisfy their own desires for junk food or recreational items.

- e. Children engaged in the shrimp sector suffer from **various adverse consequences** that include risk of life, health hazards, habit of smoking and addiction to drugs. Fry catching always involves the risk of life. Due to very nature of the work, there always remains fear of attacks by crocodiles, tigers, snakes and even by sharks. There also involves different health hazards as they have to stay long time in water and risk of waterborne diseases are always there. When children earn money, they get the sense of freedom to spend money for their own purposes that leads them to smoking and other forms of addiction.
- f. Apart from these consequences, their education is hampered. Though most of them are enrolled in schools, they are not regular at going to school. Sometimes, even if they complete the primary education, they cannot enter into the secondary level of education. The government official from the Education Department shared that child marriage and child labour are the two major causes for school dropout.

Gender perspectives in the shrimp supply chain

- a. Women are predominantly engaged in fry catching and in the production stage of the fish processing plants, as shared by all stakeholders interviewed (government officials, business actors and non-government organizations). According to the Director and Registrar of Trade Union, Department of Labour, Divisional Office, Khulna, 70% of the workers at the production level are women. However, interviews with the local NGOs and women workers inform that women and children are also involved in processing work done at the arat/depot level. Women are also seen working at the farms. Though there is a general tendency of denial, local NGOs and women farmers shared that there are wage gaps between women and men working at the farms, ***if men get 300 takas, women get 250 for the same job.***
- b. The reasons behind hiring women for the processing job are influenced by the stereotyped beliefs about gendered roles of women. As explained by the Director-General of the Department of Inspection for Factories & Establishments (DIFE) of Khulna, ***'women are patient and well skilled in cutting fishes'***. However, local NGO officials interviewed shared that poverty and vulnerability of women and lack of negotiation power are the main reasons for women's engagement in processing works. As shared by one NGO official, ***"mainly widowed, married and unmarried women work in the processing plants, and a majority of them are floating, internal migrants from other upazilas or from the nearby districts and do not hold the power like the local inhabitants and it is easy to exploit them"***. Anecdotal evidence shared by the local NGOs implies that industries often force the workers to work beyond the limit of the work hours without appropriate compensation.
- c. Interviews with NGO officials and local individuals informed that women face violence and abuse in the factories, as well as in other layers of the supply chain including at the farm level. They expressed doubt about the existence of any committee against Sexual Harassment at the factory level. Women do not share the incidents of sexual violence publically as they fear that it will only worsen their situation. ***'Violence against women (VAW) is very widespread, rape is also there but nobody pays heed to the issue', says a relative of a child fry catcher from Sharankhola of Bagerhat.***
- d. They are women as farm owners, but very few in numbers as shared by farmers and local fisheries officers interviewed. In most cases, in addition to women's household responsibilities, women contribute (unpaid labour) to the family endeavours of shrimp production.

Impact of climate change, especially in the aftermath of Cyclone Amphan and COVID on the shrimp industry

- All the stakeholders interviewed including farmers, government officials and business actors shared that climate change induced disasters like Amphan and recurrent flooding badly affect the shrimp sector. As the farmers shared, the Amphan and subsequent flooding destroyed the embankments and washed their shrimps away.
- The COVID 19 pandemic also hampered the shrimp business. According to business actors and the government officials from the Department of Fisheries, the first two months (March-April) of COVID 19 was the hardest time for all of the actors of the shrimp supply chain, as prices of shrimp went down, export orders were cancelled, and shipment was hampered.
- There were no government initiatives for small and marginal shrimp farmers who also suffered due to Amphan, flooding and COVID 19. According to a Fisheries Officer interviewed for this mapping, it is the small farmers who are most affected by any kind of disasters or emergency situation like COVID 19 and make them indebted to local Mohajans. To his view, they need special incentives in the form of a soft loan, crisis allowance to face the risks. Some farmers shared that they took a loan from NGOs like BRAC and Grameen Bank to overcome the shocks of Amphan.

Assessment of the impact of climate change (Cyclone Amphan) and COVID-19 on targeted communities

- Amphan cyclone has destroyed homes of many shrimp fry catchers. Interviews with the local NGO officials and officials from the fisheries department inform that even after one year of Amphan, people are living under the open sky on the embankments. Natural disasters also hamper the education of the children, as the schools have been destroyed. As an established fact, children and women remain at high risk of health hazards and personal security during natural disasters. Violence against women and children was identified as a potential risk of Amphan in the Joint Needs Assessment (May 2020) of Amphan done by the Needs Assessment Working Group done by Needs Assessment Working Group (NAWG) Bangladesh.
- While Cyclone Amphan and COVID 19 has had an impact on the increase in child labour, as an immediate effect of both the emergency, work opportunities for the children engaged in work including in shrimp sector has declined for the time being.
- As shared by a local teacher, child labour increased in aftermath of Amphan and COVID 19. At the initial period of COVID 19, when the country was under general lockdown and mobility was strictly restricted across the country, the livelihoods of the fry catchers and workers from other shrimp supply chain that includes children as well were affected harshly. Fry catchers family could not go for fry catching, and workers at the arat and depot level had to work with half of the wages they get in normal time. Temporary workers of processing plants lost their jobs since the factories were closed.
- An NGO based in Khulna shared that during COVID, the fry catching families didn't have any work and received no support from the government and non-government organizations. In their opinion, due to irregularities and bias of the local government representatives, support of different social safety net programmes do not reach the poor people of the targeted upazilas. As shared by the children and the local community people, even if they receive some sort of support from the government, they are not adequate for their needs.

- The education of the children was also affected due to COVID since schools were closed down. Though government and non-government organizations introduced online-based learning platforms, these alternative facilities are inaccessible to the poor fry catching families.
- However, in remote areas, COVID is no longer an issue as people of the community believe that COVID is a disease for rich people. **“Everything is running normally”**, as shared by all different stakeholders, such as farmers, children, business actors and NGO officials. These communities also don’t have basic health awareness, so they don’t bother about the COVID 19.

Conclusions and Recommendations

The mapping finds that there have been significant changes in the shrimp sector in recent decades. This sector is a priority sector for the government as an export earning source, and different policy and regulatory measures have already been taken by the government to improve governance in the sector. There has also been a change in terms of compliance with labour laws as has been shared by different government and non-government stakeholders. Meanwhile, a number of factories have appointed ‘Compliance Officers’ to look after labour laws and human resource management.

As a positive trend, the shrimp processing plants are now almost child labour free. However, there seems a tendency of overlooking the issue of child labour in other tiers of the supply chain, particularly in the fry catching. Catching of shrimp fry or post-larvae has been banned under the Protection and Conservation of Fish Rules, but without any such measurers for alternative and sustainable livelihoods for those engaged in fry catching as the only livelihood option as revealed during the consultation for this mapping exercise.

This mapping exercise assumes that while the local level government stakeholders might be supportive of the project provided that sustainable livelihoods options are there, there might be resistance from the national-level policymakers and government officials, since shrimp fry catching is not in the list of hazardous work and their priority target is now to reduce the worst form of child labour. The government now looks forward to the cooperation in reducing child labour recognized by the government as hazardous and where huge numbers of children are engaged, such as the dry fish sector.

However, a strong argument for this project could be made relating to the government’s declaration on the ban on shrimp fry catching and the policy to shift towards hatchery production of fry and fingerlings from the wild fries. To ensure effective implementation of the ban and to protect the fry catching communities from the negative consequences of government plans on hatchery production, there needs to address the livelihoods concerns of the fry catchers.

This is to be noted that on one hand, fry catching is illegal and independent in nature of work beyond the legal protection of labour laws; on the other hand, children get involved in fry catching as the only option for livelihood and supporting the family. Hence, to eliminate child labour from this tier, and from other tiers, comprehensive efforts linked with sustainable livelihood opportunities for the adult family members and education and skill-building initiatives for the adolescents of the targeted communities before withdrawing the children from the work is needed.

Since different actors are involved in the issue with different interests and influence, there is a need to adopt a multi-stakeholder approach engaging both government, NGOs, private sectors and their associations, communities and the children themselves. An integrated approach towards eliminating child labour involving both communities and the government is needed.

Recommendations

- To develop a statistical database on the number of children engaged in different kinds of child labour including in shrimp supply chain and to prepare a socio-economic profile of their households in targeted areas to address the existing data gaps and inform designing evidence-based interventions.
- To do a power analysis of relevant stakeholders (local and national government officials, local government representatives, national level policymakers, business associations, such as Bangladesh Frozen Food Exporters Association-BFFEA, other local business associations, such as Aratdar Samity, Matsya Traders Association, NGOs (Bangladesh Fish and Shrimp Foundation) and understand their position on the issue and design influencing interventions engaging them accordingly.
- To organize the children, parents, local community women and men in groups to make them aware and sensitize about the issues of child labour, its adverse consequences and their rights as recognized by different national and international instruments.
- To design interventions for engaging the employers of children, such as shrimp farmers, fishers, and traders, such as aratdars, depot owners, ice mills, retailers etc. for making them aware of child labour, its consequences, and their responsibilities as derived from different national and international instruments.
- To take interventions in activating local level business associations including small shrimp farmers associations to strengthen their negotiating role in promoting their businesses in a sustained and socially responsive manner.
- To build linkages with the existing social safety net programmes and ensure that the targeted children and their families are able to access them, and explore possible collaboration with different initiatives working in the shrimp sector or on child rights and child labour issues, such as Jiboner Jonno (Project of World Vision Bangladesh, UCEP and local TVET institutes through ILO Skills 21 Project).
- To carry out analysis on the adequacy and effectiveness of the available social safety net programmes for targeted groups in targeted areas and do national-level policy advocacy on special allocation for the targeted communities.
- To identify like-minded parliamentarians and influence them in engaging budget advocacy for the special allocation for the social protection of the targeted children and their families.
- To mobilize locally active and trusted NGOs and CSOs in disseminating message about the child labour issues focusing on internationally recognized concept of child labour that can address the issue of social and cultural acceptability of child labour.

- To carry out collaborative policy advocacy to bring shrimp fry catching under government regulations and ensure enlistment of fish/shrimp fry catching as hazardous works.
- To engage in the ongoing process of reviewing National Action Plan on Elimination of Child Labour to ensure that the concerns of child labour in the shrimp supply chain is adequately addressed.
- To devise a strategy activating government-led local monitoring bodies, such as district and upazila based child welfare boards
- Explore the opportunities to engage with buyers at international level to influence them for a special project targeting the children in shrimp fry catching from CSR (Corporate Social Responsibility) perspectives.

Introduction

Bangladesh's gradual progress in reducing poverty supported by steady economic growth is now well known to the global community. The country has made an upward shift in the average annual growth rate to more than 7 per cent in recent years (FY2015–FY2018) from the above 6 per cent rate over the last decade[1]. The per capita income of Bangladesh rose to \$2,064 in FY20, up from \$1,909 registered in 2018–19[2]. Alongside economic growth, the poverty rate has fallen from 31.5% in 2010 to 20.5% in fiscal 2019[3]. In 2015, Bangladesh attained the status of lower-middle-income country and in 2018, Bangladesh fulfilled all three eligibility criteria for graduation from the UN's Least Developed Countries (LDC) list for the first time and is on track for graduation in 2024[4].

The country has set the target of becoming Upper Middle Income Country by 2031 and a developed country by 2041 under World Bank Classification. Recently adopted long term visionary plan of the country entitled "Making Vision 2041 a Reality: Perspective Plan of Bangladesh 2021-2041" aims to bring down the extreme poverty rate to 2.55% and 0.68%, and increase the GDP growth to 9% and 9.9% by 2031 and 2041 respectively.

While the country recorded strong performance in income growth and human development, Bangladesh faces daunting challenges with an increased level of vulnerability with about 39 million people still living below the national poverty line [5]. Unequal distribution of the benefits of growth resulting in gradually increasing inequality remains a grave concern for Bangladesh. According to recent available data (HIES 2016) income inequality has increased while consumption inequality has remained relatively stable. Some of the other major interrelated challenges in Bangladesh towards achieving sustainable and inclusive growth and development are- regional disparity, violence against women and children, lack of inclusive and quality education and health services, increasing informality in the job market, high youth unemployment rate, child labour, early marriage, smuggling and trafficking, etc.

Of the challenges mentioned above, considering the children as future citizens, child labour is an issue of great significance. This is particularly important for a country like Bangladesh when almost one-third of the total population (32.4 per cent) belongs to the age group between 0 and 14 years for both sexes[6]. Child labour itself is a violation of the fundamental human right of the children as it deprives children of their childhood, their dignity and the opportunity to flourish their full potentials. It also hampers the enjoyment of other human rights, such as education, health, physical security of life etc. of the children to grow up as dignified adult having skills and capability to live a life with an adequate standard of living. On the other hand, child labour is a development concern. Child labour acts as a vicious cycle contributing to perpetuate poverty across generations by inhibiting upward social mobility centred on proper education, food and nutrition, health facilities, and recreational opportunities, among other issues.

The elimination of child labour is explicitly referred to in SDG target 8.7 as the global community commits to "take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms". Along with this global commitment, Bangladesh has a national level policy commitments and action plans to eliminate child labour which is very much essential to achieve the long term development vision of the country.

Despite the policy commitments and different efforts, child labour still remains a concern for Bangladesh which has also been recognized by the Bangladesh Progress Report on Sustainable Development Goals (2018), though the report recorded a declining rate. According to this report, the number of working children (5 to 17 years of age) has declined, from 246 million in 2000 to 152 million in 2016[7].

While the prevalence of child labour in Bangladesh's formal sector has decreased as Bangladesh's economy has grown, some 1.2 million children are still trapped in its worst forms, according to the latest National Child Labour Survey report (2013), published in 2015. And, most child labour occurs in the informal sector which remains beyond legal protection. According to a survey conducted by the Bangladesh Bureau of Statistics, 3.45 million children have been found engaged in active labour –many of them in hazardous jobs. It notes that in recent years the number of children in the labour market has increased by 250,000[12]. According to the Multiple Indicator Cluster Survey 2019 (BBS & UNICEF), 6.8% of children aged 5–17 years are involved in child labour (of which 8.8% are boys and 4.6% are girls), but this does not include children who are working under hazardous conditions.

In such a background, in 2018 the government of Bangladesh declared the shrimp processing industry free from child labour, one of the top export sectors of Bangladesh. Even after such declaration, still many children are engaged in different tiers of the shrimp supply chain, such as shrimp fry collection, shrimp farming and shrimp processing, though it is almost impossible to verify the presence of child labour in the processing part as the plants are highly restricted. Different researches found that lots of children are engaged in the informal part of the supply chain of the shrimp sector, mostly in shrimp fry collection. And, due to the hazardous nature of the work, engaging in fry collection is likely the worst form of child labour for most children involved.

Given the context, with the support of Global March against Child Labour, Bangladesh Shishu Adhikar Forum (BSAF) is going to implement a project titled **'Addressing Child Labour in Agricultural Supply Chains, Global to Local'** to contribute to making the shrimp supply chain sustainable and child labour free. The project will be implemented in the three targeted upazilas (Paikgacha and Koiria Upazila of Khulna and Soronkhola Upazila of Bagerhat District) of southern Bangladesh, one of the major shrimp processing zones of Bangladesh.

The project will work with the following three specific objectives:

1. Develop replicable good practices for child labour free and gender-inclusive sustainable shrimp supply chains in Bangladesh by working collectively with the government, civil society and private sector actors;
2. Influence the Government of Bangladesh to create 3 child labour free upazilas that include the creation of women stakeholders' group, children's parliament and youth groups with at least one-third participation of girls; and
3. Strengthen the position of local CSOs and trade unions within the international frameworks such as Alliance 8.7 addressing child labour

Prior to starting the project, Global March against Child Labour and Bangladesh Shishu Adhikar Forum (BSAF) planned this study on child labour in shrimp fry collection titled as "Mapping and analysis of child labour and associated stakeholders in shrimp fry collection in targeted Upazilas of Bangladesh" to find out the real scenario of child labour engaged in shrimp supply chain and better understand the perception of different associated stakeholders regarding child labour issues in this sector.

Objectives

The overall aim of this mapping is to inform the project for designing evidence-based advocacy strategy and interventions for engaging with the different stakeholders. Specific objectives of this mapping are:

- To gain an in-depth understanding of the various tiers of shrimp supply chain in Bangladesh, via its mapping from farm level to factory/home-based/informal work level in order to analyse the real scenario of child labour in shrimp fry supply chain in the targeted Upazilas
- To analyse the socio-economic status and vulnerabilities of child labourers engaged in the shrimp supply chain, particularly in shrimp fry catching in Bangladesh to deeply understand the root causes of child labour from supply-side (push factors) and demand-side (pull factors) at the community level and its significant consequences
- To do a mapping of stakeholders engaged in the shrimp supply chain in Bangladesh such as businesses, shrimp suppliers, exporters, intermediaries etc. as well as CSOs and relevant government departments to assess their perception, experiences, challenges and proposed solutions to address child labour in the shrimp supply chain
- To analyse gender perspectives in the shrimp supply chain to understand the gender inequality indicators and gendered norms and livelihood challenges in the targeted upazilas of shrimp fry collection
- To assess the impact of climate change and COVID-19 on shrimp producing and fry collecting communities and stakeholders related to shrimp supply chain in the selected upazilas as mentioned above
- To review the existing interventions and suggesting remedies to address child labour in the shrimp supply chain.

Methodological framework

This mapping and analysis mainly used qualitative tools, such as literature review and KIIs to collect data and information. In doing so, apart from the primary information collected through KIIs, existing relevant literature has been reviewed. A list **of documents reviewed has been provided at the end of the report as references.**

A total of 47 KIIs have been conducted with different actors of the supply chain which includes shrimp farmers, shrimp fry collectors, aratdar, faria, inter district aratdar agents, retailers, and exporters. Besides, representatives of non-government organizations working on child rights and on shrimp sector, community representatives, local government representatives, local and national level government officials, and inter-state agencies have also been consulted by way of KIIs. Given the COVID 19 situation, phonic interviews have been conducted for KIIs. **List of the participants of KIIs with the detailed information (name of the person, title, representing the organisation, contact details and date of interview) has been annexed with this report.**

High dependence on secondary data, lack of up to date data, remote interview with stakeholders, the unwillingness of the stakeholders in providing phonic interview, and the short time of span allocated for the study was the main limitations of this study.

Mapping and analysis of the sector and stakeholders

1.1 Overview of the shrimp sector of Bangladesh

The shrimp sector is one of the promising economic sectors of Bangladesh both in terms of foreign exchange earnings and employment creation. In terms of volume of the export of shrimp products, though no segregated data was found, amalgamated data on fish and fish products discloses that in FY 2017-18, Bangladesh exported 0.68 lakh MT. of fish and fish products and in FY 2018-19 (up to February), Bangladesh exported 0.46 lakh MT. of fish and fish products (Bangladesh Economic Review 2019). According to Bangladesh Bank (Central Bank of Bangladesh) sources, In FY 2017-18 export earnings from Shrimps and Prawns increased by 26 million USD from 405 million USD in FY 2016-17.

Table 1: Export earnings from shrimp and prawns

Fiscal Year	Export earnings(in million USD)
2017-18	431
2016-17	405

(Source: Bangladesh Bank)

Bangladesh is one of the world's leading fish producing countries. This sector is contributing significantly to food security by providing safe and quality animal protein. The fisheries sector contributes 3.61% to GDP and 24.41% to agricultural GDP. Fish supplements to about 60% of our daily animal protein intake. More than 11 percent of the total population of Bangladesh is engaged with this sector on a full time and part-time basis for their livelihoods[13].

The Bangladesh Shrimp and Fish Foundation estimates that there are over 600,000 people employed directly in shrimp aquaculture who support approximately 3.5 million dependents.

This sector also has a high potential from the perspective of the economic development of the country. Bangladesh earns a considerable amount of foreign currencies by exporting fish, shrimps and other fisheries products. Total shrimp and prawn production including capture has been increased from 1.60 lakh MT in 2002-03 to 2.54 lakh MT in 2017-18 (Yearbook of Fisheries Statistics of Bangladesh 2017-18)

Major destinations of Bangladeshi shrimp products are Germany, U.S.A., U.K., Spain, France, Italy, Netherlands, Canada, Japan, India, Belgium, Denmark, China People's Republic and Australia. In FY 2017-18, export earnings from Germany, Netherlands and Belgium increased by Fish, Shrimps and Prawns.

A comparative scenario of Fish, Shrimps and Prawns

Importing Countries (in terms of export earnings)

Major Countries\Commodity	Export earnings(in million USD)	
	2017-18	2016-17
Germany	65	48
U.S.A.	22	44
U.K.	65	87
Spain	3	4
France	24	18
Italy	2	2
Poland	0	0
Netherlands	97	81
Canada	4	8
Japan	19	28
India	24	19
Belgium	91	70
Denmark	6	7
China	9	8
Australia	4	1

Source: Review of Export Receipts of Goods and Services, 2017-2018, Bangladesh Bank

This table illustrates that in 2017-18, Bangladesh earned 65 million USD from Germany by exporting Fish, Shrimps and Prawns which is 26 per cent more than the previous fiscal year. Export earnings from Netherlands and Belgium increased to 97 million USD and 91 million USD respectively in FY-2017-18 from 81 million USD and 70 million USD in the previous fiscal year respectively. Contrarily, in FY 2017-18 export earnings from the USA decreased to 50 per cent compared to the previous fiscal year and export earnings from the U.K. also decreased by 22 million USD in FY-2017-18 whereas it was 87 million USD in FY 2016-17[14]. The above table shows that the Netherlands and Belgium are the top two import countries for the Fish, Shrimps and Prawns.

According to the official website of the Department of Fisheries of the Government of Bangladesh, in 2017 and 18, Bangladesh exported 68,935.72 ton of fish & fish products which includes shrimp as well. A PowerPoint presentation titled 'Bangladesh Shrimp Industry: Current Trend and Expansion Plan' by Bangladesh Shrimp and Fish Foundation (BSFF) shows a comparative scenario on the export of shrimp in the last 11 years in terms of volume as presented below[15].

Table 3: The comparative scenario of export of shrimp in terms of volume

Fiscal year	Exports (MT)	Fiscal year	Exports (MT)
2007-08	49907	2012-13	50333
2008-09	50368	2013-14	47635
2009-10	51599	2014-15	44278
2010-11	54891	2015-16	40726
2011-12	48007	2016-17	39706
2017-18	36168		

Source: Bangladesh Shrimp Industry: Current Trend and Expansion Plan, PowerPoint Presentation by BSSF, available on <http://shrimp.infofish.org/images/presentations/4%20Syed%20Mahmudul%20Huq.pdf>

Bangladesh is a global leader in inland fish production and has been ranked as the fifth largest producer of aquaculture food fish in the world. Inland fish production is the pillar of aquaculture in Bangladesh, contributing 55.15 per cent of the country's total production. Roughly 4.27 million households in Bangladesh (20 per cent of rural inhabitants) run at least one homestead pond. Ghers (converted rice fields) cover a total area of 244 000 ha and are the source of 75 per cent of the shrimp and prawn production. The fisheries sector, including aquaculture, provides employment to 17.8 million people, out of which women constitute 1.4 million. The shrimp industry alone employs over one million people in its processing factories, out of which 88.64 per cent are women[16]. The southern region and the Chittagong region are the two production zones for shrimp in Bangladesh. Within the southern region, Satkhira, Bagerhat and Khulna are the major production hubs.

However, both the business actors (exporters) and the government officials from the fisheries department share that the shrimp sector is going through several interrelated challenges, such as low productivity of the local species, lack of quality seed, high production cost, lack of adequate supply of raw materials (matured shrimps). Interview with the Senior Technical Officer of the Fisheries Research Centre in Bagerhat informs that still, 90% of farmers do traditional farming, where 10% are engaged in semi-intensive farming, though an interview with the Vice President of Bangladesh Frozen Foods Exporters Association (BFFEA) based in Khulna informs that only 5% does semi-intensive production. Though traditional species are delicious and require less input, due to its slow growth and high cost, Bangladesh is losing its markets to much cheaper but high-yielding hybrid vannamei from Thailand and other countries, said Vice President of Bangladesh Frozen Foods Exporters Association (BFFEA) based in Khulna.

Interviews with the Vice President of Bangladesh Frozen Foods Exporters Association (BFFEA) based in Khulna and Director & Registrar of Trade Union, Department of Labour Divisional Office in Khulna reveals that the processing factories are under-utilized due to lack of adequate supply of raw products affecting the export. According to Director & Registrar of Trade Union, Department of Labour Divisional Office, Khulna, out 41 shrimp processing factories in Khulna, 15-16 are running, of which 7-8 are running well.

In such a context, the government is going to implement two pilot projects on vannamei species in response to the demands from the local business actors to help boost competitiveness. Under the supervision of the Department of Fisheries and the Bangladesh Fish Research Institute, one the project will be implemented by the non-governmental organization Shushilan in Paikgacha, Khulna, and the other one by Agri-Business Enterprise in Chattogram[17]. Business actors are looking forward to going for commercial production of this species after completion of the pilots. The Vice President of Bangladesh Frozen Foods Exporters Association (BFEEA) based in Khulna shared that due to COVID 19, there has been a delay in kicking off the pilot projects, but he expressed optimism that after successful implementation of the pilot projects, Bangladesh can go for commercial production of the species and accelerate its production to compete in the global market. As he shared, **the fries of the species have to be brought from abroad, and the species needs to be cultivated in an open shed.**

This is to be highlighted in this connection that the production of vannamei is 20 times higher than that of black tiger shrimp and vannamei now accounts for around 80 per cent of shrimp exports in the world, higher than just 10 per cent of black tiger shrimp. However, there are concerns against introduction of vannamei by the green activists claiming that the culture of the species would be harmful to biosecurity[18]. Naturally, a restructuring of the shrimp supply chain can be anticipated given the introduction of hybrid vannamei species for commercial production and the sectoral restructuring will obviously impact the fry catchers' community.

There are two types of workers employed in shrimp factories: contract and permanent workers. Contract workers work under the jurisdiction of contractors who are hired by the owners to supply workers during peak seasons (April to December, with April to September for Bagda shrimp and September to December for Golda shrimp). They are paid based on a piece-rate system. The permanent workers are hired by the company itself, and as regular employees, they have to work throughout the year and are paid on a monthly basis[19].

Interviews with the different stakeholders that includes business actors, government officials from the Department of Inspection for Factories & Establishments (DIFE), Fish Inspection & Quality Control (FIQC), Department of Labour Divisional Office, Khulna and the NGO actors indicates that women are predominantly engaged in the production section of the formal processing plants where workers are hired by third-party contractors, and as contractual basis.

According to the Director and Registrar of Trade Union, Department of Labour, Divisional Office of Khulna, due to the nature of the production, the companies have to depend on contractual basis temporary workers, who on average have to work 10-12 days a month.

Rights, Benefits and Social Justice: Status of Women Workers Engaged in the Shrimp Processing Industries of Bangladesh (2014)

- a. The study estimates that 70-80% of the total workforce in processing factories is under labour contractors
- b. General tendency of factories is to keep the permanent labour to a minimum and accomplish the major work through casual contract labour, during the peak harvest of shrimps.
- c. This helps the owners to keep labour costs to a minimum, while the deprivation of labour benefits to a large section of workers continue under the pretext of the intermittent supply of raw materials.
- d. Underreporting of contract labour in order to hide this picture of deprivation

Trade Unions (TU) are officially allowed in the shrimp processing industries and there were 13 registered TUs trade unions of which 8-9 are active, as shared by the Director & Registrar of Trade Union, Department of Labour Divisional Office of Khulna. Most of the TUs are new and inactive in redressing issues of the workers in workplaces as shared by NGO stakeholders.

Interviews with the Deputy Inspector General (DIG), Department of Inspection for Factories & Establishments (DIFE) of Khulna and Deputy Director, Fish Inspection & Quality Control (FIQC), Khulna, representatives of the two government agencies in charge of monitoring the business informed that they do regular inspections to the processing factories, but they cannot do rigorous inspections to other places, such as depots, ice manufacturing companies, packaging companies etc.

To go back to the history of commercial shrimp cultivation in Bangladesh, though shrimp culture is an age-old practice in the coastal areas of Bangladesh, the shrimp culture system expanded steadily from the late 70s and 80s. In fact, export-oriented commercial shrimp farming started to expand in Bangladesh since the 1980s, closely connected with the liberalization of trade and structural adjustment programmes of the World Bank and IMF.

The early years of shrimp aquaculture in Bangladesh were largely sustained through a complex system of political patronage involving corrupt officials, local politicians and drug dealers. Forceful eviction of small and marginal rice farmers by shrimp producers, expropriation of government-owned lands and conversion of mangrove forest to shrimp ponds were some of the noteworthy characteristics of that time[20].

Lack of proper planning and the absence of regulations were main features of the initial period of commercial shrimp farming that resulted in many adverse social and environmental effects. Change in land use patterns, land-related social conflicts, social displacement and marginalization of farmers, rural-urban labour migration due to the conversion of traditional agriculture into shrimp cultivation, increasing landlessness and breakdown of traditional livelihood support systems, increasing poverty, diminishing food security, and the transfer of land and wealth to local and national elites, and changes in agricultural cropping patterns have particularly affected the landless agricultural labourers.

The initial period of commercial shrimp production was characterized by many interrelated adverse consequences on environmental sustainability, pro-poor economic growth, access to resources, and human rights abuses. Among the environmental effects, deterioration of soil and water quality, destruction of fry of wild fish and shrimp species, depletion of mangrove forest, a decrease of local variety of fish and shellfish, saline water intrusion in groundwater, local water pollution and change of local hydrology, loss of crop production, decrease of cattle production as a result of a decline in grazing land, loss of indigenous flora, scarcity of drinking water and the cooking fuel crisis, scarcity of natural resources and the increased vulnerability to extreme weather events. Inserting pipelines or sluice gates into the walls of the embankment enabling water to flow back and forth, due to prawn farming reduces the ability of walls to withstand periodical storms.

Historically, people trapped tidal water in low-lying intertidal lands by constructing small dykes to trap water, and harvested naturally occurring shrimp and finfish after three to four months. With the

commercial production of shrimp, in addition to trapping of natural shrimp seeds, farmers began to stock shrimp fry caught from the natural resources. Though this created a new work opportunity for the poor coastal people, methods of shrimp fry collection from the wild sources have had significant impacts on coastal biodiversity, as for each shrimp larvae that is caught, many other fish larvae and organisms are destroyed.

Over the last two decades, the sector has experienced different positive changes in terms of production, improvement of quality and marketing. Different regulatory instruments and mechanisms have been put in place to address social and environmental issues. The collection of wild shrimp fry from nature has been banned officially by the government in 2000.

Pressure from the exporting countries, activities of labour organizations, like Social Activities for Environment (SAFE) and the Solidarity Center, legal and community activism by different NGOs contributed in improving the situation of the sector[21]. In response to a writ petition filed by Nijera Kori and Bangladesh Environmental Lawyers Association, the Supreme Court on August 30, 2016, declared blocking saltwater in the agricultural and forest lands for shrimp farming illegal and asked the government to ensure minimum use of saltwater in shrimp farming so that the fertility of the lands is not damaged.

Interviews with the business actors including exporters, government officials from the fisheries department and the NGOs recognize the recent years' improvements of the sector. The Vice President of Bangladesh Frozen Foods Exporters Association (Khulna) shared that the sector has made positive reforms, especially in the post-harvest shrimp processing industry in the areas of social compliance and labour standards. To his opinion, export pressure mainly contributed to improve the working conditions and to address the issues of child labour in shrimp processing factories.

All stakeholders interviewed that includes business actors, farmers, local level government officials and the NGOs confirmed the change in the trend of shrimp business and expressed the similar view that **now numbers of small shrimp farmers managed by local small landowners are more where previously large scale farming was the dominant feature of shrimp cultivation.**

Key findings from the stakeholders' interview and literature review

- (i)** Export-oriented commercial shrimp farming started to expand in Bangladesh since the 1980s, closely connected with the liberalization of trade and structural adjustment programmes of the World Bank and IMF
- (ii)** Forceful eviction of small and marginal rice farmers by shrimp producers, expropriation of government-owned lands and conversion of mangrove forest to shrimp ponds were some of the noteworthy characteristics of that time
- (iii)** Change in land use patterns, land-related social conflicts, social displacement and marginalization of farmers, rural-urban labour migration, increasing landlessness, and breakdown of traditional livelihood support systems, increasing poverty, diminishing food security, transfer of land and wealth to local and national elites, and changes in agricultural cropping patterns were some of the consequences of unplanned and unregulated growth of shrimp cultivation
- (iv)** Lack of proper planning and regulatory mechanisms created the space for exploitation, abuses of human rights and adverse environmental effects.
- (v)** Shrimp fry used to inter into low-lying intertidal lands with the tidal water and the farmers only kept them in by constructing small dykes to trap tidal water, and harvested naturally occurring shrimp and finfish.
- (vi)** Now farmers have to cultivate shrimp fry caught from the natural sources; but the availability of the wild fries have been declined.
- (vii)** The shrimp sector has been developed in recent years mainly due to export pressure as claimed by the business actors and the government officials from the fisheries department, and agreed by the NGO actors.
- (viii)** Large-scale commercial shrimp farming is gradually being replaced by small holders' shrimp farming as shared by the business actors, NGOs, government officials from the fisheries department, local community people including the local government representatives.
- (ix)** Shrimp Fry Collection has been banned in 2000 to ensure the conservation of biodiversity and natural resources; however poor people living along the river bank and sea ashore still catch the shrimp fries as the only option of livelihood, as confirmed by business actors, NGOs, government officials from the fisheries department, local community people including the local government representatives.
- (x)** Due to traditional production methods, and lack of supply of raw materials, processing plants remain under-utilized which affects the export as shared by the exporters and government officials from the fisheries department.

For reference on literature, see the references given below the report

1.2 Mapping of legal, policy and institutional framework on child labour and related issues

This section briefly describes the national and international legal, policy and institutional framework on child labour and related issues.

1.2.1 National legal, policy and institutional framework

Bangladesh has a comprehensive legal and policy framework on child rights and on child labour issues. The Constitution of Bangladesh, the supreme law of the land guarantees the human rights of children in the form of provisions of fundamental principles of state policy and fundamental human rights as the provisions **(article 15- securing the basic necessities of life including food, clothing, shelter, education and medical care, and securing the right to social security, article 17- establishing a uniform, mass-oriented and universal system of education and extending free and compulsory education to all children, article 19- equality of opportunity to all citizens, article 27- equality before law and equal protection of the law, article 28- making special provision in favour of women or children or for the advancement of any backward section of citizens, article 34- prohibition of forced labour and 35- prohibition of torture or to cruel, inhuman, or degrading punishment or treatment)** are equally applicable to children.

In line with the constitutional guarantees, there are laws and policies specific to the rights of the children including the issues of child labour. The National Children Policy 2011 outlines policy provisions on children's right to health, education, cultural activities and leisure, birth registration and identity, protection, special rights of the children with disabilities, rights of the minority children and rights of the adolescents and their development. The policy also outlines steps to mitigate and eliminate child labour gradually in light of the National Child Labor Elimination Policy 2010. The policy encourages GO-NGO coordination to make the government initiatives integrated and more effective for promoting child rights.

The country has a policy and action plan on elimination of child labour, namely National Child Labour Elimination Policy (NCLEP) 2010 and the National Plan of Action (NPA) 2012-2016. The plan of action though expired in 2016, has been extended later on till 2025 provided that this plan of action will remain effective until the next action plan is introduced. Besides, the Domestic Workers Protection and Welfare Policy (DWPWP) 2015 prohibits the employment of children below the age of 14 years in domestic works, though it keeps options for employment of children aged 12 years provided that the work is not harmful to the child or it will not prevent him/her from getting an education.

The Human Trafficking Deterrence and Suppression Act 2012 criminalizes all forms of human trafficking forced labour and debt bondage etc. The National Education Policy 2010 and the Children Act 2013 are directly related to the protection and promotion of the rights of the children in accessing education and accessing justice.

Importantly, the Labour Act 2006 (amended in 2013 and 2018) prohibits employment for "children" below the age of 14 years in all sorts of work and hazardous work for the children below the age of 18 years. As per section 2(8) of the Act, a person who has attained the age of 14 but below the age of 18 is considered to be an „adolescent and as per section 2(63), a person not attaining the age of

14 is defined as a „child. Except that the definition of „child labour or „child labourer cannot be traced from any public or private document (National Child Labour Elimination Policy 2010). The Labour Act 2006 allows children between 14 – 18 years to get employed in light work subject to a certificate of fitness from the appropriate authority.

According to the National Child Labour Elimination Policy 2010, if a child engaged in labour: works for more than 5 hours per day; performs such work that creates undue pressure on his/her physical and psychological health and social status; works in an insecure and unhealthy environment; works without wage or with irregular payment or for low wages; carries out duties disproportionate to his or her capacity; works in such a condition that hinders his or her education; It is forced labour; Is compelled to do such work which demeans human dignity; becomes the victim of physical and/or mental torture and sexual exploitation; and gets no opportunity of leisure or recreation; then the very working conditions or environment would be regarded as hazardous and demeaning for his or her physical and mental health i.e. life-threatening to life. And, in 2013, the government issued an order on a list of 38 works as hazardous for children[22] and employing children in hazardous work is prohibited in Bangladesh (section 39 of the Labour Act 2006)

As far as the shrimp sector is concerned, there are several laws, policies and strategies, such as the National Agricultural Policy 2013, the National Fisheries Policy 1998, National Shrimp Sub-Strategy 2006, National Shrimp Policy 2014, Fisheries Hatchery Act 2010, Fisheries Hatchery Rules, 2011 Fish Feed and Animal Feed Act 2010, the Fish and Fish Product (Inspection and quality control) Rules 1997, amended in 2008, the Fish and Fish Product (Inspection and Quality Control) ordinance, 1983, the Marine Fisheries Ordinance, 1983, The Marine Fisheries Rules, 1983.

In 2011, the Ministry of Fisheries and Livestock of Bangladesh adopted nine sets of Codes of Conduct for nine important segments of the shrimp based industry value chain which includes **shrimp farm, shrimp/fish feed mill, shrimp collection and service centres or depot, ice plants, fishing boats, shrimp or fish carrier transport van / vessel and fish / shrimp processing plants**. Among other issues, the code of conduct includes provisions on prohibiting child labour and forced labour, and different kinds of discrimination including gender based discrimination. The code of conduct obliges the concerned actors to abide by the national labour laws and made it a prerequisite in getting registration/trade license from the concerned authority of the Department of Fisheries.

Besides, Agricultural Policy 2013 pledges to gradually reduce child labour engaged in hazardous agricultural works. The shrimp policy 2014 aims to take necessary steps for alternative employment of the wild fry catchers to sustainably stop the catching of the wild fries and ensure compliance with the relevant national and international labour laws and associated rules on employment of workers in shrimp industries. On the other hand, the Fisheries Policy 1998 though didn't make any reference on child labour but includes the provisions of taking appropriate measures to improve living standards of the fishers' community. The shrimp strategy also refers the necessity of balancing the needs for livelihood protection of shrimp fry collectors while regulating the collection of wild fry to conserve natural the resources.

There are also several other guidelines, such as Fish & Fishery Product Official Controls Protocol, 2015 (Inspection Manual), Compliance Guidelines for Fish Feed Production, Import & Marketing, 2015, Compliance Guidelines for Shrimp Hatchery, 2015, Manual on Good Aquaculture Practice- Trainer

Manual, Compliance Guidelines for Fish Feed Production, Import & Marketing, Good Aquaculture Practice – A Farmer’s Guide, and Compliance Guidelines for Shrimp Hatchery as found in the annual report (2017) of the Fisheries Department of Bangladesh. However, these documents could not be reviewed using the lens of child labour and gender equality due to unavailability of the documents online.

As the long term visionary document of the country, Perspectives plan 2041 embodies the strategies of strengthening public-private partnership for education and training and to strengthening the policy measures to reach out children in urban slums, hard to reach areas and out of school children which have direct linkage with the elimination of child labour.

In terms of regulatory mechanisms, besides the national level offices, there are divisional, district and upazila level offices, such as District and Upazila Fisheries Offices, divisional and district level, district level labour welfare officers, divisional and district offices of the Department of Inspection for Factories and Establishments, Offices of the Fish Inspection & Quality Control (FIQC), district and upazila level child welfare boards. The mandate of labour inspectors was expanded in 2017 to cover informal enterprises and workplaces listed as hazardous for children. Child labour now forms part of the Standard Operating Procedure for inspections.

1.2.2 International legal, policy and institutional framework

The primary international instruments on child labour includes the UN Convention on the Rights of the Child (UNCRC) 1989, ILO Minimum Age Convention, 1973 (No. 138), and Worst Forms of Child Labour Convention, 1999 (No. 182). Of these three instruments, the UNCRC, considered as the bill of rights for the children obliges the State parties to take legislative, administrative, social and educational measures to ensure protection of children from labour through providing a minimum age for admission to employment, formulating appropriate regulation for working hours and conditions of employment and providing an appropriate penalties or other sanctions to ensure the effective enforcement of the provisions.

ILO Minimum Age Convention, 1973 (No. 138), one of the eight fundamental conventions of ILO sets the general minimum age for admission to employment or work which is 15 years of age (13 years for light work) and the minimum age for hazardous work at 18 years (16 years under certain strict conditions). And, the **Worst Forms of Child Labour Convention, 1999 (No. 182)**, another fundamental convention of ILO requires the ratifying states to eliminate the worst forms of child labour, including all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflict; child prostitution and pornography; using children for illicit activities, in particular for the production and trafficking of drugs; and work which is likely to harm the health, safety or morals of children. The convention requires ratifying states to provide appropriate direct assistance for the removal of children from the worst forms of child labour and for their rehabilitation and social integration. It also requires states to ensure access to free basic education and wherever possible and appropriate, vocational training for children removed from the worst forms of child labour.

The another ILO convention named Convention No. 189 on Decent Work for Domestic Workers obliges the state parties to take measures to ensure effective promotion and protection of the human rights of all domestic workers, including the elimination of all forms of forced or compulsory labour and effective abolition of child labour.

Of all these international treaties, Bangladesh ratified the **UNCRC in 1990 and ILO C182 in 2001** and expressed its commitment at the global level to ensure the rights of the Bangladeshi children.

Other international guiding instruments on human rights and labour rights in relation to business operations are OECD FAO Guidance for Responsible Agricultural Supply Chains (2016) that aims to prevent risks of adverse environmental, social and human rights impacts in agricultural supply chains, Declaration on International Investment and Multinational Enterprises 1976, OECD Guidelines for Multinational Enterprises (OECD Guidelines), the Guiding Principles on Business and Human Rights [Implementing the UN 'Protect, Respect and Remedy' Framework] (UN Guiding Principles) 2011, the International Labour Organization Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (ILO MNE Declaration) 1977, The Principles of the UN Global Compact, FAO Code of Conduct for Responsible Fisheries, 1995, the Children's Rights and Business Principles and the CRC General Comment no.16.

Of these guiding instruments, OECD FAO Guidance for Responsible Agricultural Supply Chains includes a model enterprise policy illustrating the relevant international standards e.g. the standards on human rights and labour rights include the elimination of all forms of forced or compulsory labour, the effective abolition of child labour and the elimination of discrimination in respect of employment, occupation and food safety that enterprises should observe to build responsible agricultural supply chains. OECD Guidelines for Multinational Enterprises (OECD Guidelines) are one of four parts of the 1976 OECD Declaration on International Investment and Multinational Enterprises, and these guidelines are the first international instruments to integrate the corporate responsibility to respect human rights as set out in the UN Guiding Principles and to incorporate risk-based due diligence into major areas of business ethics related to adverse impacts.

The Principles of the UN Global Compact - Derived from the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, the United Nations Convention Against Corruption and the Ten Principles of the United Nations Global Compact include the principles of respect the protection of internationally proclaimed human rights; the elimination of all forms of forced and compulsory labour; the effective abolition of child labour; and the elimination of discrimination in respect of employment and occupation.

Recognizing the need for an explicit child rights perspective and guidance for companies on how to prevent and address risks to children's rights, Save the Children, UNICEF and the UN Global Compact adopted the Children's Rights and Business Principles (CRBP) in 2012 through a consultative process with business, child rights experts, civil society, governments and children. The CRBP are the first set of principles that identify a comprehensive range of actions that all business should take to respect and support children's rights in everything they do – in the workplace, marketplace, community and environment – and in conjunction with the government's duty to protect human and children's rights.

The Children's Rights and Business Principles set out business actions to respect and support children's rights as outlined by the Convention on the Rights of the Child, and the International Labour Organization's Convention No. 138 on Minimum Age and Convention No. 182 on Worst Forms of Child Labour.

However, for shrimp exporters, the ASC standard is the leading aquaculture sustainability standard at a global level, with ASC-certified products being preferred by buyers in the EU and North America. ASC certification imposes strict requirements based on the core principles of the International Labour Organisation (ILO) that include prohibiting the use of child labour or any form of forced labour. Besides, FAO Technical Guidelines on Aquaculture Certification of 2011 to guide the development, organisation and implementation of credible aquaculture certification schemes also includes a provision stating that – "child labour should not be used in a manner inconsistent with ILO Conventions and international standards".

The application of certification in aquaculture is now viewed as a potential market-based tool for minimizing potential negative impacts and increasing societal and consumer benefits and confidence in the process of aquaculture production and marketing. These guidelines provide guidance for the development, organization and implementation of credible aquaculture certification schemes.

An explicit commitment to deal with challenges of child labour is also embodied under goal 8 of the SDGs which seeks to 'promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all. Target 8.7 under this goal states that member states of the UN should: take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.

The UN Guiding Principles on Business and Human Rights (UNGPR) represent a milestone in the business and human rights discussion as they provide an authoritative global standard for preventing and addressing the risk of adverse impacts on human rights linked to business activity. Their unanimous endorsement by the Human Rights Council in 2011 has resulted in an increased awareness on the role of businesses in supporting and respecting human rights.

The CRC General Comment no.16 adopted in 2013 by the Committee on the Rights of the Child also illustrates State obligations regarding the impact of business on children's rights with the objective to assist States parties in meeting their rights and obligations under the Convention on the Rights of the Child. The Comment stresses on the importance for States to have in place well-functioning child-focused governance structures and mechanisms which ensure that children's rights are not 'left behind' and over-shadowed by consideration of business interests. More specifically, the Comment spells out the role of Governments in supporting children's rights in the context of business activities by providing them with authoritative guidance on how to regulate, influence and engage with the private sector to make sure that companies respect children's rights.

1.3 Understanding shrimp supply chain

This section outlines different tiers of the shrimp supply chain and about the actors involved in different tiers. This section also discusses the functions and influence of different stakeholders involved in the different layers of the chain.

The mapping identifies four distinctive tiers of shrimp production, such as **1) pre farming (fry collection or fry production); 2) farming; 3) processing; and 4) marketing**. Though the exact structure of the supply chain varies depending on the type, nature and volume of production and marketing channel, this mapping presents below a commonly found supply chain in the shrimp production and marketing.

Generally, the supply chain actors include sea-fisher, fry catcher, hatchery owner, hatchery employee, nursery owner, nursery employee, fry *faria*, fry *aratdar*, fry commission agent, farmer, shrimp *faria*, shrimp *aratdar*, shrimp commission agent, shrimp processor, processor-cum-exporter, retailer, domestic buyer, and a foreign buyer.

1. **Sea Fishers:** Sea fishers catch shrimp in the Bay of Bengal and then sell those to retailers, shrimp *faria*, and shrimp *aratdars*. They also sell mother shrimps to hatcheries for breeding and production of shrimp fry.
2. **Fry Catchers:** Usually the extreme poor people, locally known as *Jaila* (poor fishers) living in the coastal areas catch shrimp fry and then sell those either to fry *faria* and sometimes to farmers as well. They are the most vulnerable actors lying at the bottom of the entire supply chain. Sometimes, they are even overlooked as part of the formal supply chain. This is a seasonal work as fry catching time depends on lunar cycle and more fry is available during the full moon day and the new moon day. Interviews with business actors and the government officials from the fisheries department indicates that the volume of wild fry catching has been decreased overtime because of the scarcity of natural resources and the ban on wild fry catching. However, poor fishers are compelled to engage in shrimp fry catching to earn their livelihoods. Both men, women and children work as fry catchers.
3. **Fry Faria:** Fry *faria* are small scale traders or intermediaries who buy shrimp fry round the year either from fry catcher or from the hatchery and sell shrimp fry to fry *aratdars*. However, sometimes one fry *faria* sells fry to another fry *faria*. Most of the fry *faria* prefer to buy wild fry as they perceive those as stronger than the fry from hatchery even though those are cheaper. April to September is the peak season for buying shrimp fry and during this period they do business every day and usually twice a day. During the offseason, they take a loan from fry *aratdars* to overcome financial distress and trap themselves into a contract to sell all fry to the lender to evade verbal or physical abuse. Usually, this is a men led trade.
4. **Fry Aratdar:** Fry *aratdars* are comparatively large-scale traders or intermediaries who deal with shrimp fry that come from either hatchery or natural sources. The fry *aratdars* buy shrimp fry from fry catchers directly or from another fry *aratdars*. Some fry *aratdars* also play the roles of farmers who have or can manage land for shrimp production. In most cases, shrimp fry is transported from fry *aratdar* to the commission agent by air or road. This is also a men led trade.

5. **Fry Commission Agent:** Fry commission agents who are sometimes called *bepari* are medium to large-scale entrepreneurs and live away from where fry *aratdars* live. They hold fry for a short period of time, filter the fry containers to remove the shell residuals and other impurities, sort by fry size, and then sell those to the farmers. Usually they do not feed the fry. They also sell fry produced at hatcheries, but they sell wild fry at higher price due to their higher survival rate and popularity. Many fry commission agents these days sell shrimp fry to nearby nurseries from where farmers buy the nourished fry.
 6. **Nursery:** Nursery is a predominantly men operated place where the fry that has travelled a long way get energised and adapted to the geochemical configuration of the production environment. Technical expertise and some controlling devices are required for the operation of nursery which usually remains operative during the season for shrimp production. A maximum of three days stay of the fry at nursery adds superior value to the shrimp value chain. Nursery services enhance the survival rate of fry to about 100%, which also increases the price of the fry. This service is a new addition to the shrimp value chain; and it might help overcome the low survival rate of hatchery-produced fry. At present, there are 824 private nurseries Bangladesh [23].
 7. **Hatchery:** Hatchery is a place where shrimp fry is produced from mother shrimp with utmost care and using technological supports. The hatchery gets mother shrimp mostly from farmers and/or sea fishers. For breeding, mother shrimp are kept in a dark quarantine room at a controlled temperature. Maintenance of cleanliness and calmness are emphasised and are the most crucial factors behind successful breeding. Main breeding room has a special sort of sanctity and only the key caretaker can enter that room to perform essential work. According to Bangladesh Shrimp and Fish Foundation (BSFF), there are 92 shrimp hatcheries in Bangladesh.
- Close to the hatcheries, another shrimp-related supply business has recently been developed, dealing fish feed and other accessories. However, the decreasing trend in number of hatcheries implicates narrower peripheral business opportunities [24].
8. **Farmer:** Farmers grow shrimp by nourishing fry to marketable sizes in *gher* (local name of shrimp farm). The sources of fry for farmers include nursery, hatchery, fry *aratdar*, and fry commission agent. Households in Khulna, Bagerhat, and Satkhira possessing even a small piece of bare land get involved in shrimp farming.

Sometimes shrimp *faria* and shrimp *aratdar* influence which variety farmers would grow exploiting the lender-borrower power relationships imposed through *Dadon* (advance money given as informal loan). Availability or ownership of land is a pivotal factor in the shrimp value chain as it influences production cost. Most of the farmers are men, which reflect gendered ownership of land. But women and children work as labourers in the shrimp *ghers*.

Farmers sell shrimp either to shrimp *faria* or directly to the shrimp *aratdar*. Sometimes they also sell to retailers when they overproduce or there exists a shortage of buyers. They face challenges in pricing shrimp due to monopsony and their inability in storing shrimp for deferred selling at a better price. Most of the farmers also produce vegetables alongside the *gher*, what they sell in the market after domestic consumption.

9. **Shrimp Faria:** Shrimp *faria* buys shrimp from farmers and sells mostly to shrimp *aratdar*, but sometimes to another shrimp *faria* and retailers. They generally trade round the year, though the peak season is only for five months. Sometimes they enjoy economic advantages through favourable price-fixing by offering loans to respective farmers. They cannot preserve shrimp for a long time and therefore need to sell on the same day to *aratdars*. As they do not keep shrimp over a day, they do not need to feed them. Even during contingency when they need to keep shrimp over a day, for instance for natural calamity or countrywide strike, they use ice within the box/metal drum where shrimp is kept. Although sometimes *faria* operate independently, in many cases they work as representatives of *aratdars* or depots.
10. **Shrimp Aratdar:** Shrimp *aratdars* buy shrimp directly from farmers or from shrimp *faria* and sell to either shrimp commission agent or retailer. Sometimes there exist multiple levels of shrimp *aratdars* where one shrimp *aratdar* sells shrimp to another shrimp *aratdar*. Shrimp *aratdar* sometimes use a platform for auction selling which is popularly known as Chatal. This auction selling can ensure a better price for the shrimp *aratdar*. However, sometimes this selling approach might not offer a price advantage to shrimp *aratdar*, which they would enjoy by selling properly sorted and graded shrimp.

This is to be mentioned that *arats* are privately owned auction places where the owner rents out space to *aratdar* who facilitate the auctioning process. *Arat* mostly consists of a cluster of small shops in concrete sheds in the open air or a cluster of small shops in an indoor auction hall. The *aratdars* are equipped with iron tables, plastic crates, and traditional (cata) weighing equipment. *Arat* can vary in size. The smallest ones have only 4 or 5 *aratdar* inside their premises, while the largest can have more than 50. While smaller *arat* seem to be well organised, larger *arat* can be rather chaotic with less control on product inflow and outflow [25].

11. **Depot owners:** Depots are collection centres where supply is consolidated. The volumes traded by depots vary considerably. In general depots close to the production areas are smaller, while depots close to the district headquarters and the factories in Khulna are larger. Contrary to an *aratdar*, a depot owner actually purchases the product from farmers and *faria*. Depots add value by grading the shrimp and prawn and packing it for transport to the factories. Depots also regularly pre-process shrimp and prawn for the factories. Pre-processing mostly consists of de-heading and peeling of prawn. Along with men, they engage women and children in doing this job. However, unlike *aratdars*, depots mostly offer farmers and *faria* credit payments.

Farmers and *faria* seem to be less interested in selling through depots because they argue that the selling process at depots is not transparent and farmers and *faria* are afraid that they will not get fair price for their products. Only the farmers, who are bound to depots because of their isolated location or due to indebtedness for receiving informal loans (*dadon*) from depots, sell the shrimps to depots.

12. **Shrimp Commission Agent:** Generally, shrimp commission agents buy shrimp from shrimp *aratdars* and sell mostly to formal processors who are also shrimp exporters. They also sell shrimp to processors who do not export. They generally enjoy superior power, as they are the only link between supply of shrimp and the front-end export entities. Their activities are more formal and institutionalised.

13. **Processor and Processor-cum-Exporter:** Processor and processor-cum-exporter are institutionalised value chain actors and are generally located in urban areas with convenient transportation facilities. All categories of labour including women and men are involved in processing activities. While processors sell processed shrimps to retailers, processor-cum-exporters sell high-quality processed shrimp to exporters. Sometimes a few shrimp processors also sell semi-processed shrimp to domestic buyers, which also include shrimp heads and de-shelled shrimp.

However, maintaining a traceability system is particularly difficult for Bangladesh due to involvement of a large number of small-scale suppliers (farmers, *faria*, *aratdar*, retailers, and commission agents) and their informal processing which varies and is complex in nature. Processor-cum-exporters need to conform to all required compliance guidelines and get approval from both local and foreign buyers' representative quality checkers. Processor-cum-exporters usually sell shrimp under their own brand. However, they also export with a customised brand name as per buyers' demand. It is a common practice among most of the processor-cum-exporters to maintain multiple brands and they generally do it to achieve the portfolio advantages and minimize the risks.

Processing includes de-heading, cleaning, freezing and packing. According to the Director & Registrar of Trade Union, Department of Labour Divisional Office, Khulna, there are 41 shrimp processing factories in Khulna.

14. **Shrimp Retailer:** Shrimp retailers sell shrimp in local or domestic markets. Generally, institutional buyers make the majority of the local purchase. Shrimp retailers have a low scale but regular sales. Although they usually sell regular shrimp but sometimes, they also sell mother shrimp which they buy from nearby hatcheries. They generally buy shrimp from various sources including farmer, shrimp *faria*, shrimp *aratdar*, and processor.

Retailers at coastal areas usually buy shrimp from sea fishers but in this case, they can only buy a few varieties. While retailers sell both fresh and processed shrimps, they do not do any processing. They do cash only sales and generally do not offer credit sales. They enjoy a powerful position in fixing the sales price which they decide based on the size of the shrimp. Domestic buyers comprise their clientele who have very limited bargaining power.

The Export Promotion Bureau deals with the processes of finding buyers for the processed shrimps and arranging for the required GoB export licenses and GoB quality certificates (required by buyers). This process is done through private companies or individuals. Processing plants may export directly or decide to go through specialized exporters or exporting companies.

Most processors and exporters are organized in associations that look after their common interests and represent them in different forums. The Bangladesh Frozen Food Exporters Association and the Shrimp Hatcheries Association are the most important ones with a lot of influence in the formulation of government policies.

14. **Foreign buyer:** Foreign buyers include institutional buyers from more than 50 countries and the major buyers are from the USA, EU, UK, Japan, Middle East, and Southeast Asia (GoB 2017). Although foreign buyers buy a range of different varieties of shrimp but the most preferred one is Bagda. Generally, foreign buyers buy processed shrimp. Packaging plays a pivotal role while exporting shrimp and that needs to match with specific demand from the foreign buyers.

Interviews with exporters shared about the following foreign buyers (brand):

- a. Peninsula- EU
- b. Vision Sea- UK
- c. Mitsubishi Corporation- Japan
- d. Kitchen of the Ocean- the USA
- e. Red Chamber Company – USA

The specialities about marine shrimp value chain in Bangladesh, in comparison with shrimp value chain based on mainland shrimp production, include absence of a group of actors (fry catcher, fry *faria*, fry *aratdar*, and fry commission agent) who deal with shrimp fry. Marine shrimp grows naturally in the sea from fry to the marketable sizes at which sea fishers catch those. In most cases sea fishers get different other sea fishes along with shrimp and they retain all the marketable varieties of fishes for sale. As sea fisher gets the shrimp grown naturally at their marketable sizes, intermediary value chain actors mentioned above are redundant in this case.

For instance, in the case of marine shrimp value chain where mechanised boats are used, workers or labourers are involved managing several processing activities including sorting, de-shelling, de-heading, deveining, and preliminary packaging. These workers are not found in the marine value chain where manual boats are used.

Like the mechanised boat approach, this approach also involves only men as women are discouraged to participate due to the high risk involved in fishing in the deep sea. Another aspect of this approach is that shrimp catchers can enjoy market price in selling shrimp as it is free from the influence of contract selling imposed by the lenders. Nevertheless, in both approaches, intermediaries sell semi-processed or un-processed shrimp either to the processor-cum-exporters for further processing and packaging for export purposes, or to the processors for reselling shrimp ultimately to domestic buyers through retailers. In a similar manner, sometimes one intermediary sells shrimp to another intermediary.

In addition to the tiers described above, other supply chain actors are feed mills, transportation companies, Ice mills and Super Markets. Consumers, scientists and technology providers (government and non-government government) and NGOs are also important stakeholders in the shrimp supply chain. For instance, BRAC has hatchery projects, Khulna based NGO Shushilan is going to implement a pilot project on Vannamei Hybrid Species in Paikgacha Khulna.

The supply chain as described above is comprehensively informed by several available shrimp supply chain analysis, namely: 1) A Gendered Analysis of the Shrimp Sector in Bangladesh, 2006; 2) An Update of Shrimp and Prawn Supply Chain Initiatives in Bangladesh (2014); and 3) Shrimp Value Chain in Bangladesh, Abureza Mohammad Muzareba and Mubina Khondkar, 2019.

1.4 Prevalence of child labour in the shrimp supply chain

Though the issue of child labour had once been a grave concern for the shrimp industry, over time Bangladesh has made significant progress in eliminating child labour from the processing plants which was once home to the pile of child labours. A study (2014) titled as 'Rights, Benefits and Social Justice: Status of Women Workers Engaged in the Shrimp Processing Industries of Bangladesh' confirmed this progressive status. The study found no child labour (age below 14) in Khulna region where 8 girls below 14 were found to be working in Chittagong region. The study further informed that they found 74 (13.5%) girls between 14-17 years of age in Chittagong the region, and 4 girls and 3 boys in this age group in Khulna region.

The business actors and the government officials interviewed for this mapping purpose claimed that there is no child labour in processing plants. To their opinion, the government has declared the sector as child labour free, so there is no scope for employing children in the factories. Interviews with the NGO actors also expressed similar views by saying that processing factories and hatcheries are now almost child labour free. They said the situation improved mainly due to international pressure and the government's declaration of the sector as child labour free.

However, several NGOs and local individuals shared in the form of anecdotal evidence that still some factories engage children as contractual workers, but the numbers might not be that huge as compared to the scenario of 10/12 years ago. Several NGOs shared that children are usually engaged as temporary workers during the peak season and this can be observed when the workers walk to the factories or at the factory gate. Another view is that- during the visit by EU or by government authorities, they tactfully remove the children from the work. However, the issue of child labour in processing plants has been found very sensitive and particularly the business actors of all layers including the farmers and the government officials were sensed very careful talking about this issue.

Male and female workers claimed that the factories do not hire younger children anymore, but reported that many youths, mostly girls, take up contract work in the factories from as young as age 14 and study at the same time. Source: Women's Empowerment in Aquaculture: Two Case Studies from Bangladesh (FAO, 2017), page no 57.

Other available literature indicates that issuing appointment letters and identity cards have helped in reducing child labour in the processing plants, the introduction of compulsory birth registration programme by the Government, introducing policy and different regulations prohibiting child labour has also been instrumental in eliminating child labour from the processing plants.

However, there have been issues of restricted access to the processing plants and lack of adequate research works on the present situation of compliance with relevant national and international labour standards as shared by different NGO actors. Interestingly, the Deputy Director of the Fish Inspection & Quality Control (FIQC), Khulna invited the interviewers to visit the factories and talk to their workers. Other government officials interviewed from Khulna also assured to extend support to the initiative of reducing child labour in different layers of the shrimp supply chain.

Though there are differences of opinion about the volume of children engaged in shrimp fry catching, all the stakeholders interviewed including farmers, business actors and NGOs confirm the involvement of children in shrimp fry catching. Children usually go for fry collection along with their parents, but sometimes they also go without their parents, with other adults or children. Sometimes, they are also hired by other fishers. However, the number of children fry catchers has been reduced over the time, as shared by the different government officials including the Deputy Inspector General, Labour Inspectorate Division, Khulna and the District Fisheries Officer of Khulna. Contrarily local NGOs claim that still a huge number of children (both boys and girls) are engaged in shrimp fry catching. Though there is no such research available on the exact number of the children engaged in shrimp fry catching in the three targeted upazilas of Khulna and Bagerhat districts, Upazila Fisheries of Sharankhola Upazila gives an estimation of around 400/500 children engaged in shrimp fry catching in Sharankhola upazila. This has also been confirmed by one of the local NGOs working on child labours in shrimp fry collection. On the other hand, Upazila Fisheries Officer of Koira Upazila gives a rough estimation of 700-800 children who are engaged in shrimp fry catching in Koira Upazila of Khulna district. However, several government and non-government stakeholders reflected that fry collection is mainly a family-driven, independent livelihood option where both boys and girl get engaged.

In between the fry catching and processing plants, there are several other supply chain actors, such as arats, depots, ice manufacturing, transportation, packaging etc. Though no recent study is available about the accurate number of child labour in those tiers of the supply chain, stakeholders including business actors, government officials and NGOs interviewed for this mapping confirmed the existence of child labour in these different tiers of the supply chain other than the formal processing factories, such as wild fry catching, farming, transportation, arats (auction centre), assembling points (known as depots). Of all the supply chains, child labour (both boys and girls) are predominantly engaged in wild fry catching, sometimes independently and sometimes along with their parents. Newspaper sources reveal that hundreds of thousands of children living in the coastal districts including Khulna, Bagerhat, Satkhira, Patuakhali, Noakhali, Feni, Chandpur, Borguna, Barisal, Pirojpur, Jhalakathi, Bhola, Cox's Bazar and Chittagong is involved in fishing to support their families. But there is no official statistics on the number of children involved in the shrimp business [26].

Though a general tendency of denial of engaging children in the depots, *arats* etc. were observed while interviewing the owners of depots, *arats*, ice factories in transportation companies, but few of them admitted that sometimes children work, but only for short time and they do light work.

One *Aratdar* shared that there is no scope of employing children, as they have to submit information about their employees including the name and age to get license from the Department of Fisheries. At the same time, he shared that **there are people who does business without licenses and that creates the space to engage children in their establishments.**

Local NGOs from Khulna and Bagerhat shared from their observation that many children work in depots, arats, ice factories, and packaging companies and in transportation companies. They are usually seen to cleaning the shrimps, serving tea, sweeping, even for loading and unloading the packages.

Deputy Inspector General, Labour Inspectorate Division, Khulna also confirm the engagement of children in some *arats*. However, according to him, since the work done by the children in depots and other layers of supply chain except the formal processing factories are not hazardous in nature and the volume of the children engaged in such works is not that high, they cannot give priority to these layers. To his opinion, though these sectors are within the formal sectors, but these works are not considered as hazardous work, they have scarcity of human resources and they have to set priorities for the sectors – where the job is hazardous, and large volume of children are engaged, export oriented companies etc.

Regarding the involvement of children at the farm level activities, two dimensions have been found during the interviews with stakeholders: engaging children in family initiatives and employing children by medium and large scale farmers. As confirmed by both the government officials and the farmers, in case of small scale farming, children are engaged along their parents and other family members as to support the family initiatives and there lacks clarity among the farmers and the government officials as to how children helping the family work can be considered as child labour.

In medium and large scale farming, many children are engaged as workers, as shared by local NGOs. According to one NGO official, huge no of children aged 10-12 years work in gher, along with mothers. The children work for building/repairing embankments, pulling the nets, riding boats, feeding the shrimps, cleaning the thorny shaola (moss) etc. But during interviews with the farmers, some farmers admitted the fact of engaging children and some denied. Lack of clarity about the definition of children and conceptual clarity about child labour might be the reasons for such opposing views.

This is to be highlighted that though shrimp fry catching is independent nature of work, sometimes fry catchers remain bound to sell the fries to the *farias* as conditional to credit taken in times of crisis which limits the scope of negotiation for better price. In other cases, where children work either in depots, *arats*, or in loading/uploading, local packaging they do the work on hourly basis, and get less payment compared to the adult.

While usually children aged between 12-17 works in shrimp fry catching and as day labourers in shrimp farms, a local NGO official shared that children aged 7-8 years also go for fry catching along with their parents. Though varies, average daily income from fry catching ranges from 200-400 taka depending on the volume of fry they can catch.

Regarding the wage gaps at the farm level activities, local NGOs informed that there are huge wage gap between adults and the children. One NGO official shared that if adult gets 500 taka per day, a child gets 80 taka and sometimes they get only food without any wages. Interviews with farmers, particularly the women farmers and the government official from the department of labour inspection also confirm the existing wage gap between adult and children.

A recent study (2019) entitled 'Study on Child Labour in Hazardous Sectors in Bangladesh' conducted by INCIDIN Bangladesh revealed that 79% (84% girls and 75% boys) of the surveyed children (engaged in shrimp frying) from Morrelganj Upazila of Bagerhat district are enrolled in schools. Of the total children surveyed in the Upazila, 61% of them work less than 4 hours a day, where 32% works for 4-8 hours and 4% of them have to work for 9-12 hours a day. 24% of the surveyed children inform that they are engaged by others to collect fries.

With regard to dependency on shrimp fry buyers, 29% said that they have no dependency, where 10.7% shared the dependency on the shrimp fry buyer for treatment cost, 10.7% for assistance during natural disaster, 49% support during festivals (Eid/puja etc.) and 48% for support to meet social obligations (marriage, food, circumcision etc.).

Educational status of Children engaged in shrimp supply chain

Key findings from stakeholders' interview

- (i) As shared by NGO officials, there is very low level of education among the children fry catchers and children engaged in gher, arats etc. as workers. As a general scenario, almost all the children get enrolled in primary schools. But they are irregular in school. They go to school when they can manage time.
- (ii) Sometimes they drop out in primary level. Sometimes though they can complete the primary level, they cannot continue their education to the next level, as shared by one relative of a child fry catcher from Sharankhola of Bagerhat district. Quality of education is a concern as shared by the local NGO officials.
- (iii) A child fry catcher interviewed for this mapping shared that he is now about 15 years and he studied upto class three.
- (iv) The children and the parents don't have aspiration for education. The main motivations for enrolment in schools are getting stipends and other assistance, as shared by one local NGO official.
- (v) A marginal farmer from Koiria Upazila, Khulna shared that almost all the children (both boys and girls) go to school and complete primary schools. The children do the farm level activities to help the parents. As he shared, sometimes the children can't go to schools due to work. But as they are poor, they have no other option.
- (vi) About 70% of children belonging to small and marginal shrimp farming families can study upto class eight or nine. Only a few can complete Secondary or Higher Secondary Education as shared by several shrimp farmers.
- (vii) Md. Mozinur Rahman, Deputy Director of Fish Inspection & Quality Control (FIQC), Khulna shared that sometimes they also find children working in gher. But when asked to the gher owners, they (gher owners) informed that they are the children of their family, and they (children) help the family farming during their off time.

1.5 Causes and consequences of child labour in shrimp supply chain

The three upazilas targeted for this project are coastal upazilas of the districts and are known as the most poverty stricken areas. People living along the bank of the rivers/seashore are the poor fishers who mainly depend on fishing; some also work as day labourers. Assurances of their livelihoods are subject to the availability of the fishes in the river or in the sea. Moreover, natural disasters like cyclones and flooding make their life miserable due to climate change. Different sources confirm that even after around six months of Amphan, many families in the coastal belts, especially in Koira Upazila still live under open sky, on the embankments. They are the landless people, many of whom live in khas lands (government owned lands).

In such a scenario, household poverty has been cited as the main reason for child labour in shrimp supply chain. Associated with poverty, other push factors of child labour include sudden sickness of the main earning member of the family, lack of adequate social protection services, need for educational expenses, such as buying note books, pens etc. also pushes the children into work.

Like other parts of the country, the other reasons of child labour in shrimp supply chain are social and cultural acceptance of child labour, lack of aspirations for education, lack of awareness about consequences of child labour, and lack of proper guidance. As revealed during the interviews, sometimes children are engaged in part time works to satisfy their personal desires of eating street foods, buying sport items. Different stakeholders interviewed including government officials have been found wondering why children supporting the family would be considered as child labourers indicating the social and cultural acceptance of child labour.

Particularly on the issue of children engaged in shrimp fry collection, high demand of wild fries, independent nature of work, and lack of institutional monitoring are also responsible for such a large number of children engaged in shrimp collection as pull factors.

Some other pull factors for child labour in the shrimp sector in the targeted areas include low wages, vulnerability of children to exploitation etc. Interviews with local NGOs inform that there are huge wage gap between adults and the children. One NGO official shared that if adult gets 500 taka per day, a child gets 80 taka and sometimes they get only food without any wages. Interviews with farmers, particularly the women farmers and the government official from the department of labour inspection also confirm the existing wage gap between adult and children.

Root causes of child labour in shrimp supply chain	
Push factors	Pull factors
<ul style="list-style-type: none">Household povertyEconomic shocks (due to sudden and long term illness of the adult income earning family members and climate induced natural disasters)Indebtedness of the familySocial and cultural acceptance of child labourLack of awareness about the long term effects of child labourLack of adequate social protection services	<ul style="list-style-type: none">Low wageVulnerability to exploitationHigh demand of wild fries, independent nature of workInability of the small farmers to hire workersDesire to earn money satisfy personal wishes, such as buying junk foods, recreational items etc.Availability of work in shrimp farms, arats etc.Lack of strong monitoring and weak enforcement of laws

All the stakeholders including government officials, business actor and NGOs interviewed for this mapping purpose shared that fry catchers are the extreme poor people and sometimes they don't even have permanent shelter. Some of them are landless, where some have small piece of homestead land, some are internally migrant (from other upazilas, or from other neighboring districts) due to climate induced natural disasters. Apart from shrimp fry catching, they also catch other types of fishes, sometimes they work as day labourers in the shrimp farms as well.

Several stakeholders that include government officials, business actors and NGO officials viewed the issue of child labour as a cultural issue. They shared that the children get habituated to this work of fry catching from their very childhoods. On the other hand, lack of awareness about the bad effects of child labour among the guardians, and lack of aspirations for education have also been shared as the reasons of child labour in the targeted communities. Interestingly, few stakeholders that include government officials and business actors shared that sometimes children get engaged in work to satisfy their own desires for junk food or recreational items.

As a direct impact, like other child labourers, children engaged in the shrimp supply chain are deprived of basic human rights, such as education, health and recreational opportunities as essential to develop their full potential. Referring to mother of a girl child, the Daily News Paper, the Newage[27] reported that all the students of a primary school in Sharankhola upazila leave the school during high tide for netting fries. Besides, children engaged in shrimp fry collection face work specific consequences, such as health hazards that include illness due to staying in water for long period, fear of drowning and attack of crocodiles and tigers etc.

With regard to awareness on illegality of collection of shrimp fry, the INCIDIN Bangladesh study (2019) informs that 25% of the surveyed children in Morrelganj Upazila of Bagerhat district don't know that shrimp fry collection is illegal. And, 49.3% of the surveyed children shared that they faced harassed by authorities for collecting shrimp fries.

Interviews with the Khulna based government officials also expressed the similar opinions. As shared by the Deputy Inspector General, Labour Inspection Department of Khulna, 'since shrimp fry catching is illegal, sometimes they have to confront the monitoring done by the different law and order enforcement agencies including coastal guard, navy etc. and be subject to chasing by those law enforcing agencies'.

Consequences of child labour

Key findings from the stakeholders' interviews

- (i) Children engaged in fry catching suffer from various adverse consequences that include risk of life and health hazards. There always remain the risk of attacks by crocodiles, tigers, snakes and even by sharks
- (ii) There also involves different health hazards as they have to stay long time in water, risk of waterborne diseases, flu and cold related diseases are common there.
- (iii) Education is hampered for the children engaged in shrimp supply chain irrespective of whether they are engaged in shrimp farms, arats, or in transportation or in fry catching.
- (iv) The children engaged in work get habituated to smoking and addiction to drugs. When children earn money, they grow the sense of freedom to spend money for their own purposes that leads them to smoking and other additions.
- (v) Children engaged in work whether at farm level or in fry catching or in other supply chains, are subject to different forms of violence by the adults that includes physical violence as well.

1.6 Mapping of stakeholders engaged in the shrimp supply chain

The shrimp sub-sector is driven by the private sector and several types of private sector actors, such as shrimp farmers, intermediaries, shrimp suppliers and exporters are actively present in the shrimp supply chain. Other than the private sector actors, several government departments have regulatory roles. Civil Society Organizations (CSOs) also have role to play as a pressure group especially on the issues of human rights and labour rights, and making the entire supply chain child labour free.

Amongst the direct actors of this supply chain, wild shrimp fry catchers are the most vulnerable actors in the supply chain where mostly women and children work. But they are not organized. Other than this group, other actors, such as farmers, aratdars, depot owners, retailers, hatchery owners, exporters are all organized in different forums to pursue their respective group interests, such as National Shrimp Farmers Association (NSFA), Packaging Industries Association of Bangladesh. Of these groups, the Shrimp Hatchery Association of Bangladesh (SHAB), and Bangladesh Frozen Foods Exporters Association are the most influential groups in negotiating with the government and other stakeholders' groups. This is to be mentioned that though there are shrimp farmers associations at local levels, they seem to be inactive. The connection of the national level shrimp farmers association and the local level framers association could not be explored due to lack of information.

The mapping finds that there are almost 2,70,000 shrimp farmers engaged in the traditional or extensive practice of Bagda production, and there are 92 shrimp hatcheries in Bangladesh. The same source informs that there are 108 fish processing plants with an installed processing capacity of about 4,00,000 MT out of which 73 are approved by European Union and 8 by Russia[28].

Bangladesh Shrimp and Fish Foundation (BSFF), a non-profit private research and advocacy organization on the shrimp and fish sector is an influencing non-government actor closely working with the government and the other non-government organizations to facilitate inclusive growth in the sector and ensure compliance with relevant international standards including ILO conventions. They have been found playing an active role in developing code of conduct and other regulatory instruments for the different segments of the shrimp supply chain as described in the section 1.2.

As far as the government agencies are relevant, though there are several ministries involved on the issues of children, such as Ministry of Education, Ministry of Women and Children Affairs, Ministry of Health, Ministry of Social Welfare and Ministry, Ministry of Labour and Employment is the lead Ministry in eliminating child labour[29]. The Mapping of Ministries by targets in the implementation of SDGs highlighted different actions that includes Instigation of the National Plan of Action for Implementing the National Child Labour Elimination Policy 2010, develop short, medium and long-term programmes to eliminate child labour in Bangladesh and take effective measures to reduce child labour, and eliminate worst forms of child labour with a particular focus on child domestic workers, migrants, refugees and other vulnerable groups.

However, given that as a broad economic sector, Ministry of Agriculture and Ministry of Fisheries and Livestock (Department of Fisheries), Ministry of Commerce (Export Promotion Bureau and Fishery Products Business Promotion Councils (FPBPC) have also vital role both in integrating concerns about the prevalence of child labour in the bottom tiers of the shrimp supply chain in different policy discussions, standard setting, monitoring and inspections.

In terms of locally based government agencies, District and Upazila based fisheries department, Regional office of the Department of Inspection for Factories & Establishments (DIFE) and Office of Fish Inspection & Quality Control (FIQC), Khulna are the important stakeholders because of their role in providing license and monitoring the establishments. In addition, local educational institutions, and government educational departments also need to be engaged in the process so that they can strengthen their monitoring and motivational works with the parents and can take a proactive role in facilitating special support programmes targeting these extreme poor working children. Though there needs more in-depth analysis finding out their position about the project, primary discussions through interviews with them indicate that they all would be supportive to the initiative provided that there are adequate measurers for alternative livelihoods of their families and them.

Besides, district and upazila based child welfare boards as the government run mechanisms would also be important stakeholders in mobilizing the opinions on the issues of child labour in shrimp fry collection, and other supply chains and strengthening their roles. Local government representatives, particularly Union Parishad (UP) bodies and UP Standing Committee on Welfare of Women and Children can also play an active role as most of the social safety net programmes are implemented through them and they have also social responsibility in addressing the social issues.

Local level NGOs can also play a greater role in mobilizing the community to clarify the concepts of child labour and consequence of the child labour in the futures of the children which need to be explored further. This mapping finds from the official website of Khulna District Administration that that there are 14 NGOs working in Khulna district, 23 NGOs in Koiria Upazila and 2/3 NGOs in Paikgacha. 71 NGOs are listed in the official website of Bagerhat District Administration where 10 NGOs working

in SharanKhola. Information provided by Voice of South, BSAF member organization shared a list 33 NGOs in Bagerhat district, and 23 in Sharankhola Upazila. Apart from this, discussion with the BSAF partner, Voice of South reveals that in Bagerhat there is an NGO coordination committee which can also be utilized as an organized body of NGOs working in the area. But, there needs further analysis of the prospects and constraints of collaboration with NGOs as part of stakeholder analysis.

With regard to national NGOs, Nijera Kori has long experience of working in the shrimp sector from the human rights perspectives and Karmajibi Nari (KN), Bangladesh Institute of Labour Studies (BILS) have long experience of working on workers' rights in the informal sector.

With regard to international NGOs, World Vision Bangladesh has operations in Khulna region on child labour issues, and they run a project named Jibone Jonno (for life) with activities in Khulna sadar (headquarters) and in Mongla, Bagerhat. UCEP is another NGO working in skills development for the disadvantaged population groups and they have operations in Khulna.

Inter-state agencies, namely ILO and UNICEF have explicit mandate on elimination of child labour and FAO work on responsive agricultural practices. And, all three agencies work at the policy level along with the field operations. This study interviewed representatives of ILO and FAO, they showed their keenness to work with the said project of BSAF and Global March and share their learning and experiences in the respective fields and join in the policy influencing works at the national level.

Of the policymakers, there needs to be further analysis to find the potential allies from the parliamentarians. However, different standing committees, like Standing Committee on Ministry of Women and Children Affairs, Standing Committee on Ministry of Fisheries & Livestock, Standing Committee on Ministry of Labour and Employment, Standing Committee on Ministry of Education, Standing Committee on Ministry of Social Welfare, and members Parliamentary Caucus on Child Rights of Bangladesh would be the primary list to be engaged.

A list of the relevant stakeholders that we tried to reach for this study has been annexed for reference. A list of parliamentary standing committees has also been attached which can guide for next steps of analysis.

1.7 Mapping of the money involved in the particular supply chain (value chain analysis)

This section presents a value chain analysis highlighting the influence of the supply chain actors in different stages in terms of adding value and making profits at the different stages. In doing so, this mapping exercise mainly relied on the available value chain analysis done by different persons in different times, namely- A Gendered Analysis of the Shrimp Sector in Bangladesh 2006, Marketing of shrimp in Bangladesh-A value chain analysis 2014, and the Value Chain Analysis of Shrimp of Dacope Upazila in Bangladesh (GMA Hossain, MI Hossain* 2019).

As revealed in the above mentioned literature, as a dynamic and growing sector with export opportunities, in one hand the shrimp sector provides business opportunities to middle and upper level actors in the value chain, such as Aratdars, Depot owners, Processing Plants, Exporters etc., on the other hand the sector also offers livelihood opportunities to the rural poor people, mainly the small shrimp farmers, workers, and fry catchers, the participants of the bottom layers of the value chain.

Value adding activities involve fry catching, hatching, sorting fry from other pre larvae, fry trading, fry transporting, fry nursing, farming, shrimp grading, shrimp trading, shrimp processing, shrimp transporting, shrimp warehousing, shrimp grading for foreign markets, packaging and exporting.

This is to be highlighted that the fry catchers, where women and children predominantly work are the most vulnerable groups within the entire value chain. Despite that the government has already banned wild fry catching considering the issue of conservation of natural resources, resource poor fishers, along with their children still catch shrimp fries in absence of any other alternative options for livelihoods.

The fry catchers are the extreme poor people, typically landless or land-poor fishers, and often they do not own their own nets. This situation leads them to take loans from different sources, mainly from intermediaries, and get locked into debt conditions with specific intermediaries making them bound to sell the fries to farias (intermediaries) as conditional to loan taking. As already mentioned, women and children are predominantly engaged in wild fry catching, the study confirms the engagement of both boys and girls. Though they mainly are engaged in fry catching along with their parents, some older children do this work independently as family occupation. And, their earnings are treated as family income and spent accordingly. However, sometimes children are also engaged with other fry catchers as wage earners. The study (2019) of INCIDIN Bangladesh[30] discloses that 24% of the surveyed children from Morelganj Upazila of Bagerhat district are engaged by others to collect fries. However, interviews with farmers inform that some fry catchers also sell their products to the farmers directly when they can get comparatively high prices. However, many small farmers buy fries from the hatchery as the prices of the hatchery fries are lower. Importantly, this mapping exercise observes that in most of the cases, wild fry catchers are not considered as part of the supply chain undermining their existence.

After the wild fry catchers, small farmers remain in vulnerable positions, though production rates and returns are variable. Many small farmers for various reasons including lack of market information, lack of transport facilities, restrictive contracting relationships with the intermediaries are compelled to sell to specific intermediaries with lower prices. Furthermore, numerous small farmers face insecure land rights and leases.

In terms of marketing, rough estimation as revealed in the above mentioned studies, that 80% shrimp is exported and the rest 20% is consumed in the local market. Considering all kinds of market, ***the average gross marketing margin and profit of shrimp in the local market were Tk. 171.00/kg and Tk. 134.04/kg respectively but for the export market, the corresponding amounts were Tk. 142.76/kg and Tk. 89.51/kg respectively.***

This is to be mentioned that nature and types of costs at different stages in the marketing process are not identical due to dissimilarities of marketing functions at various stages of the supply chain. Mainly five types of intermediaries' viz., faria, aratdars, beparies, inter-district aratdar agents and retailers were found to be involved in shrimp marketing. These five categories of intermediaries perform different marketing operations and functions and accordingly, there is a large variation in marketing cost incurred by the intermediaries.

However, marketing costs for each kg of shrimp were estimated to be Tk. 6.19, 5.07, 1.19, 10.17, 8.19 and 5.43 for shrimp farmer, *faria*, *aratdar*, *beparies*, inter-district *aratdars* and retailers respectively. In lieu of taking commission, *aratdars* simply help *beparies* to sell their products and collect buyers (retailers) to purchase it without taking any risk of loss or damage of fish. **Accordingly, *aratdar*'s marketing cost was lower (Tk. 1.19/kg) compared to that of other intermediaries. The processing plant (or export firms/ agencies) incurred the highest cost Tk. 54.19 per kg for exporting shrimp.**

Another similar scenario was presented in the Value Chain Analysis of Shrimp of Dacope Upazila in Bangladesh (GMA Hossain, MI Hossain* 2019) which indicates that shrimp must be passed through at least seven actors which make the shrimp industry complex. It showed that added value by *faria* per kg. *Aratdar* added Tk. 18.57 per kg, *bepari* added Tk. 40 per kg and retailers added Tk. 51.60 per kg. Depot owner added Tk. 44 per kg and sent it to the commission agent who added Tk. 10 per kg before selling it to the processing plant. Processing plants hold the top position in the value chain governance as they incurred the highest share of profit (44%) earned by different market actors.

Both two studies revealed that processing plants processed the raw shrimp and added Tk. 228 per kg, which is the highest amount across the entire value chain before sending it off to the importing countries which showed the dominance of processing plants. As processing plants added 62.85% of the total value as a marketing cost, they remain in the leading position.

It can be seen that both purchase and selling price was highest for processing plants respectively at Tk. 79000 per quintal and Tk. 101800 per quintal. The second highest purchasing price was Tk. 64222 per quintal paid by the retailer. While the second-highest price was also received by the retailers at Tk. 69389 per quintal but their purchase price is Tk. 64222 per quintal. The lowest price was received by the *faria* (Tk. 57833 per quintal).

Purchasing and selling price by actors (per quintal) in BDT		
Actors	Purchasing price	Selling Price
Processing Plants	Tk. 79000	Tk. 101800
Retailers	Tk. 64222	Tk. 69389
Faria	Tk. 54533	Tk.57833

Source: Value Chain Analysis of Shrimp of Dacope Upazila in Bangladesh (GMA Hossain, MI Hossain* 2019).

In understanding the governance of the shrimp value chain, the study revealed that the external party plays an influencing role in the legislative governance part while national bodies play the monitoring role. In terms of efficiency of different marketing channels of shrimp, the studies showed that the shorter channel is the efficient channel.

1.8 Gender perspectives in the shrimp supply chain

The salient features of gender equality in the shrimp supply chain include the participation of women and men in different tiers of the chain, types of participation, gendered challenges faced by women and progress made so far.

Though no recent comprehensive study has been found, different previous studies registered the over-representation of women in the bottom layers of the supply chain, and mainly as workers. There are very few women traders and fish farmers. Though women's participation in fish farming has increased in recent days as reported by different government and non-government interventions, the reality is that women act as de-facto managers of the family initiatives, most often they contribute (unpaid labour) to family initiatives and main decision making lies with the heads of the households who are men by defaults. This is also related to the issue of land ownership, in the prevailing socio-cultural context men own the land. However, in a few cases in absence of men either because of death or illness or due to staying away from home, women take the leading role in managing the farms.

Referring to a 2008 study, an FAO publication 2017 entitled 'Women's empowerment in aquaculture: Two case studies from Bangladesh presented that 80% of women do casual jobs in processing factories, such as de-heading, counting, peeling etc., and in feed processing, such as snail collection and snail breaking, 70% of women do shrimp fry catching in the sea/rivers, 40% women as labours in shrimp ponds and in development and repairing embankments, and cleaning water, de-weeding), 3-4% women are engaged in the shrimp business, such as trading, contractors, intermediaries), where 1-2% of women work as shrimp farmers, and 0.1% women in management in processing centres.

Though this is quite an old report, discussions with different stakeholders for this mapping purpose indicate the same scenario. According to Director & Registrar of Trade Union, Department of Labour, Divisional Office, Khulna, 70% of the workers at the production level are women. And, interviews with the local NGOs and women workers reveal that women and children are also involved in processing works done at the arat/depot level. However, no interviewees confirmed the presence of women in fry/shrimp trading in the targeted upazilas.

The FAO publication (2017) as referred above informs that the fisheries sector, including aquaculture, provides employment to 17.8 million people, out of which women constitute 1.4 million. The shrimp industry alone employs over one million people in its processing factories, out of which 88.64 per cent are women[31]. However, as indicated above- since women are located at the lower end of the supply chain, they have lower status, opportunity and control than their men counterparts.

Contrarily, though in the last few decades shrimp processing plants went through positive reforms in terms of compliance with national and international laws, mainly due to international pressure, and support from the government and non-government organizations, very little is known about the situation of women workers. However, anecdotal evidence says that women are mainly employed in the processing works and as casual workers outsourced by third party contractors. These casual workers are not paid directly by the factory owners and don't have any formal relationship with the factories. And, they do not have any career progression pathways. They do work in hazardous

conditions, as they have to work in watery/cold work for 8–12-hour shifts standing on their feet in very low temperatures. Nevertheless, as a positive trend different factories have started employing women in different technical and managerial jobs, though very low in numbers, as shared by the government officials interviewed for this mapping purpose.

The mindset behind hiring women for the processing job is influenced by the stereotyped beliefs about gender roles of women. **‘Women are patient and well skilled in cutting fishes’** as shared by the Director-General of the Department of Inspection for Factories & Establishments (DIFE) of Khulna. However, local NGO officials interviewed shared that poverty and vulnerability of women, lack of negotiation power are the other main reasons for women’s engagement in processing works. As shared by one NGO official, **“mainly three types of women-widow, married and unmarried women work in the processing plants, most of them are floating, an internal migrant from other upazilas or nearby districts and they do not hold the power like the local inhabitants and it is easy to exploit them** Anecdotal evidence shared by the local NGOs implies that industries often force the workers to work beyond the limit of the work hours.

With regard to gender based violence, neither women nor men are open to talk about the issue. But the prevailing country wide situation on gender based violence and different old studies on shrimp value chain recognize the prevalence of violence against women in the sector. Interviews with NGO officials and local individuals inform that women face violence and abuses in the factories, as well as in other layers of the supply chain including at the farm level. They expressed doubt about the existence of Committee against Sexual Harassment at the factory level. But, due to fear of social stigma and further victimization, women and girls experiencing violence do not want to disclose the incident of violence and harassment. **‘VAW is very widespread, rape is also there but nobody pays heed to the issue’, says a relative of a child fry catcher from SharanKholā of Bagerhat.**

Though a general tendency of denial of wage discrimination between women and men was sensed during the interviews, several discussions reveal that if man gets 300 taka for a work, woman gets 250 for the same job, which is greatly influenced by stereotyped beliefs about women’s capability. The INCIDIN Bangladesh study 2019 discloses that monthly income of the surveyed children from Bagerhat is BDT.1869 (girls BDT 1487 and boys BDT 2134) indicating practice of gender based wage gap in shrimp fry catching level as well.

The FAO publication (2017) highlighted that the gender stereotypes and gender division of labour also factored into how women and men workers accepted the differences in wage levels between genders. The study referred the opinions of the study participants as they explained that **men earn more because they have to work longer hours (such as staying through three shifts) or carry out harder physical labour. Women were seen as not being able (or eligible to work multiple shifts) because women have to return to their families and household obligations.** Interestingly, one small farmer interviewed for this mapping exercise stressed on the double burden on women, as working outside does not spare them from household responsibilities.

However, socially-acceptable exceptions (stepping out of accepted gender roles and spaces) are found to occur mostly in the case of necessity (poverty or absence of an able-bodied male household member); otherwise, women face reputational and social repercussions for failing to conform to these stereotypes[32].

Considering that issues of gender equality and women's empowerment are deeply rooted with the patriarchal socio cultural context, there needs integrated approach to bring substantial progress in gender equality in shrimp supply chain highlighting awareness of women about their rights, awareness of men about gender equality, attitudinal change about gendered role of men and women and availability of remedial mechanism in violations of rights.

1.9 Impact of climate change, especially in the aftermath of cyclone Amphan and COVID on the shrimp industry

Due to geographic location, coastal belts of Bangladesh are highly exposed to different climatic hazards and natural disasters. The south-west coastal region has already been diagnosed with increasing effects of different slow onset events such as rising temperatures, salinity intrusion and sudden climatic shocks such as cyclones, floods, storm surge etc. Cyclone/storm surge has been identified as one of the most frequent, severe and of high magnitude sudden climatic event affecting the area, attributing to the proximity of these villages to major rivers nearby [33].

The shrimp sector is located in the coastal belts face different climate change specific challenges. In recent years, due to recurrent attacks of several cyclones (Cyclone Fani in May 2019, and Cyclone Bulbul in November 2019), the sector suffered hugely. Again, the simultaneous attacks of Cyclone Amphan and Pandemic COVID 19 severely affected the sector in 2020. These crises affected all the layers of the supply chain including farmers, traders, and labourers. A large number of people lost their livelihood due to the destruction of cultivable land, riverine and hatcheries as a result of Cyclone Amphan, the strongest cycle that hit Bangladesh in May 2020, and severely affected the large parts of Satkhira, Khulna, Bhola and Barguna districts as widely reported in different newspapers.

Data from the Department of Fisheries (DoF) shows that a large number of fish and shrimp enclosures, ponds, along with fish fry of several species were destroyed due to Amphan. According to newspaper sources, Cyclone Amphan affected 18,090 shrimp farmers in the Khulna division [34]. It has also been informed from the newspaper sources that fish farmers of Bagerhat suffered losses worth Tk. two crores ninety lakh after Cyclone Amphan washed away almost 4,635 fish and shrimp enclosures in the district [35]. Another newspaper reported that fish worth Taka 64 crore, shrimp worth Taka 188 crore, fish and shrimp fries worth Taka 19 crore were destroyed [36].

As part of the chain, around 50 thousands of workers lost their income as the ghers were closed, and another 2,000 workers lost their jobs as the arats (wholesale markets) were closed[37]. The export of shrimp remained suspended due to the impact of Coronavirus. There were no sufficient customers of Shrimp in local markets as well.

The coronavirus pandemic has hit the shrimp industry hard like a total of 290 export orders worth Tk. 4.6 million have been cancelled in a span of a month. Following the massive cancellation of the orders, the fish exporting companies have stopped buying fish from the shrimp cultivators. Meanwhile, some of the factories have sent their employees on leave. Bangladesh Frozen Food Exporters Association's president Kazi Belayet Hossain told Prothom Alo over the phone that a total of 290 export orders worth Tk 4.6 billion have already been cancelled.[38]

Data from Bangladesh Bank shows a decreasing trend of export earnings during the COVID 19 pandemic. The data shows that export earnings from Shrimps and Prawns decreased by 43 million USD in the quarter April-June, 2020 whereas it was 91 million USD in the quarter of January-March, 2020[39].

Table: comparative status of export of fish and shrimp products (in million USD)

Commodity	April-June, 2020	January-March, 2020
Fish, Shrimps and Prawns	62	116
a) Fish	19	25
b) Shrimps and Prawns	43	91

Source: Bangladesh Bank

To facilitate export trade and overcome COVID-19 related disruptions, interest rates on Export Development Fund (EDF) loans have been reduced and the size of EDF has been enhanced to USD 5.00 billion[40]. The government provided an incentive package of Taka 5,000 crore for export-oriented industries as soft loans with the condition that the money could only be used for payment of salaries and allowances. The government has also taken loan schemes of 3000 crore taka for low-income professionals, farmers, small and marginalized businesses. Some assistance was provided to the fishers under the **Community Based Climate Resilient Fisheries and Aquaculture Development in Bangladesh project**, but that was limited to the project intervention areas, three targeted upazilas of this project were not covered by this said assistance programmes.

However, discussions with the different business-relevant stakeholders indicated that this stimulus package was not adequate and not that benefitting as was given as a loan. And, by now since the lockdown has been eased and export orders are being resumed, the exporters expect to overcome the situation soon. But new apprehension is being expressed by some exporters, when the second wave of COVID 19 is on its way, as the UK already declared lockdown.

As a coping strategy, the stakeholders suggest introducing modern production technology to meet the shortage of raw materials, heightening/strengthening the embankments, bringing the shrimp farmers under insurance and introducing special loan facilities for shrimp farmers of Bagarhat, Khulna and Satkhira districts.

1.10 Assessment on the impact of climate change and COVID-19 on targeted communities

It is widely recognized that children are one of the most vulnerable groups to adverse climatic conditions. A UNICEF report titled, 'A Gathering Storm: Climate Change Clouds the Future of Children in Bangladesh,' reported that climate-linked environmental disasters are threatening the lives and futures of more than 19 million children in Bangladesh. The report explains that more than 19 million children, spread across 20 of Bangladesh's 64 districts are exposed to the greatest risk from climate-related disasters such as cyclones, floods and drought. According to this publication, around 12 million of those most affected live in and around river systems that regularly burst their banks, leading to life-threatening floods [41]

According to Kristina Wesslund, Child Protection Specialist, UNICEF Bangladesh, climate change is one reason why an estimated 3.45 million Bangladeshi children are involved in child labour. The Daily Star quotes her "Climate change is undoubtedly increasing the number of children who are pushed into the workplace, where they miss out on an education and are terribly exposed to violence and abuse"[42].

The common impacts of climate change events on the children and their families include loss of permanent shelter, migration to cities, lack of access to nutritious food and clean water, risk for diseases, lack of access to education, exposure to violence and harassment. Child labour and child marriage are two major dire consequences faced by children as effects of climate change. As the disaster-prone areas, children in the targeted three upazilas are no exception to this scenario.

Regarding the implication of climate change on children, another publication of UNICEF[43] disclosed that 25% of the population living in coastal areas vulnerable to cyclones engage children in work as one of the coping strategies. Similarly, Cyclone Amphan Joint Needs Assessment (JNA) done by Needs Assessment Working Group (NAWG) Bangladesh indicated that a large number of people lost their usual habitat and livelihood due to the hit of Amphan, which may force them to adopt negative coping mechanism risking a potential increase in gender-based violence, child labour, child marriage, human trafficking[44]. As an established fact, children and women remain at high risk of health hazards and personal security during natural disasters. The aforementioned need assessment also identifies the risks of violence against women and children as a potential risk of Amphan attack.

Interviews with small farmers and government officials reflect that Amphan has destroyed the homes of many shrimp fry catchers. Interviews with the local NGO officials and officials from the fisheries department inform that even after one year after Amphan, people are living under the open sky on the embankments. Natural disasters also hamper the education of the children, as the schools are destroyed. They also shared about high risks of health hazards and personal security of children and women during natural disasters.

On the other hand, COVID 19, the global pandemic as already spread across the country is impacting children in different ways, such as hampering education, affecting physical and mental health. And, children from poor families are experiencing disadvantaged situations due to the loss of livelihoods of the households. They are also unable to maintain social distancing and ensure hygiene and

protective kits pushing them into high risks of contamination. However, there seems to have a lack of awareness about the COVID 19 in the targeted communities, which might be due to less spread of the virus in those areas.

While Cyclone Amphan and COVID 19 has had impact on increasing child labour, work opportunities for the children engaged in work including in shrimp, the sector was shrunk for the time being as immediate effect of both the emergency situation.

As shared by a local teacher, child labour increased in aftermath of Amphan and COVID 19. At the initial period of COVID 19, when the country was under general lockdown and mobility was strictly restricted across the country, the livelihoods of the fry catchers and workers from other shrimp supply chain that includes children as well were affected harshly. Fry catchers family could not go for fry catching, and workers at the arat and depot level had to work with half of the wages they get in normal time. Temporary workers of processing plants lost their jobs since the factories were closed.

To tackle the situation both the government and non-government organizations have taken different measures that include cash and food distribution among the poor families, awareness-raising, distribution of hygiene and protective kits. In addition, the government declared the expansion of the Vulnerable Group Feeding (VGF) and Vulnerable Group Development (VGD) programs and open market sales of rice at lower prices.

The government has distributed cash support among 35 lakh beneficiaries rendered poor because of the coronavirus pandemic after preparing a database through multi-layer scrutiny of the people who needed it most. This means two-thirds of the 50 lakh poor families suffering from the economic consequences of the coronavirus outbreak in Bangladesh received Tk 2,500 each, according to a finance division letter[45].

Interviews with local government representatives shared about the different assistance given to the poor families in the unions of the targeted upazilas. Some community people confirmed receiving such assistance, but they shared that assistance was inadequate compared to the crisis.

An NGO official based in Khulna shared that during Corona, the shrimp fry catchers and shrimp labourers including the children didn't have any work. But, they didn't get any support from the government and non-government organizations. According to his opinion, due to irregularities and bias of the local government representatives, support of different social safety net programmes do not reach the poor people of the targeted upazilas.

The government has taken different alternative initiatives, mainly through four platforms: Electronic Media Platform, Mobile Platform, Radio Platform and Internet Platform to assist the children to continue education through digital media. Non-government organizations working for education for poor children have also initiated alternative ways of distance learning. Government, Development Partners, and NGO entities are working together to produce and facilitate remote learning contents to reach a maximum number of students. Currently, the Electronic Media Platform has been operational through Television broadcasting of prerecorded lessons for pre-primary to primary grades. The state-run 'Shangshad Bangladesh Television' has started broadcasting this content

from 29 March for secondary and from April 7, 2020, for primary. During the program 'Ghore Bose Shikhi' (Learning from Home), lessons are being delivered on every subject for 20 minutes from 2 pm to 4 pm every day.

However, due to the lack of availability of android phones, televisions and internet facilities, poor children are less likely to benefit from these special arrangements on education. These alternative facilities are also inaccessible to the poor fry catching families.

To continue the school feeding programme, the government resumed the school feeding recently and government officials and teachers are distributing fortified biscuits to the houses of over 30 lakh primary school students so that they are not deprived of nutrition while schools are closed due to the coronavirus outbreak. An interview with a local teacher informs that the biscuits are also being distributed door to door in his areas. Recently, primary schools teachers have also been assigned to visit the children at their homes to guide them in their studies and provide them with counselling.

As for the remote areas, Corona is no longer an issue for the targeted communities. They believe that Corona is a disease for rich people. "Everything is running normally", as shared by different stakeholders, such as farmers, children, business actors and NGO officials. These communities also don't have basic health awareness, so they don't bother about the COVID 19.

1.11 Mapping existing interventions to address child labour in the shrimp supply chain

This mapping exercise reveals that there are a few interventions to address child labour in the shrimp supply chain in the targeted region. However, the study found different interventions on aquaculture and addressing child labour in general, some are previous projects and some are currently in implementation. This section summarizes these interventions with the thought that some of their learning, experiences and practices might be useful for the said project on addressing issues of child labour in the shrimp supply chain.

SL	Brief of the intervention	Implementing agency and contact address	Remarks
01	<p>Improving Labour Law Compliance and Building Sound Labour Practices in the Export Oriented Shrimp Sector in Bangladesh (1 August 2013 - 31 December 2015)</p> <p>Funded by the government of Bangladesh, this project aimed to promote better labour law compliance with international labour standards, particularly fundamental principles and rights at work in the export-oriented shrimp sector.</p> <p>The project engaged the Ministry of Labour and Employment (MoLE), the Department of Fisheries and Livestock (DoFL), Department of Inspections for Factories and Establishment (DIFE) and employer' and workers' organizations as the target groups and partners.</p> <p>Outcome documents of the project could be explored to learn about their strategies and experiences of engaging with government and private business stakeholders, as it has been shared by different interviewees that the project, along with other interventions contributed a lot in improving the situation of child labours in the shrimp processing plants.</p>	-	
2	<p>Trade for Decent Work Project (1 January 2019 - 31 December 2020)</p> <p>Funded by the European Union, the project aims at improving the application of the ILO fundamental Conventions and working conditions in EU trading partner countries and contributing to the United-Nations Sustainable Development Goal (SDG) 8, through improved labour relations and working conditions.</p> <p>The project started with the following beneficiary countries: Bangladesh, Myanmar and VietNam.</p> <p>Project objectives include strengthening the capacity of constituents to actively participate in national processes to comply with International Labour Standards (ILS), particularly the Fundamental Conventions; and promoting the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (2017), referenced in EU Trade for All Policy and sustainability chapters of EU Trade agreements through training of key actors (e.g. OECD National Contact Points) and dedicated events bringing together business and civil society, policymakers and international organizations.</p> <p>Enhancing the capacity of tripartite constituents and other stakeholders such as the the judiciary, parliamentarians, civil society organizations, human rights institutions, to advocate the promotion and implementation of ILS.</p> <p>https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2019/Bangladesh.pdf</p>	Ms Mara Fabra Porcar , Project Coordinator	

3	<p>Country Level Engagement and Assistance to Reduce Child Labour (CLEAR Project) -21 June 2015 - 20 April 2017</p> <p>Funded by U.S. Department of Labour (USDOL), the project was implemented in 10 target countries to reduce child labour, including its worst forms. Bangladesh component of the project was focused on the implementation of the National Child labour Elimination Policy and the National Plan of Action (NPA). The project was successful in many aspects including the activation of the child labour monitoring committees and introducing Community Level Monitoring System (CLMS) in rural setting through a pilot programme.</p> <p>Partners: Ministry of Labour and Employment, Employers organizations, Workers organizations and NGOs</p>	Syeda Munira Sultana; Email: dhaka@ilo.org	
4	<p>Standard and Trade Development Facilities (April, 12 – September, 15)</p> <p>Funded by WTO, the project was implemented by FAO in collaboration with the Department of Fisheries, Ministry of Fisheries and Livestock.</p> <p>Though the main objective of the project was to increase international market access for shrimp and prawn products originating from small-scale farmers in Bangladesh, issues of child labour and women's empowerment was an integrated element of the project.</p> <p>FAO personnel interview for this said mapping cited the example of this project as a good practice on the successful integration of child labour and women's empowerment.</p>	Begum Nurunnahar, National Operations Officer Officer, FAO in Bangladesh	
5	<p>Asia Regional Child Labour Programme (ARC) - 2 May 2019 - 30 September 2023</p> <p>Funded by the Department for International Development (UK Government), the Asia Regional Child Labour Programme (ARC) aims to reduce vulnerability to child labour and enhance the protection of children from exploitation in Afghanistan, Bangladesh, India, Nepal, Myanmar and Pakistan to contribute to the eradication of child labour, particularly its worst forms.</p> <p>The Programme will combine research, both through surveys and qualitative studies and the piloting of interventions using the integrated area-based approach towards the creation of child labour-free zones, including improvement of law enforcement and enhancement of public awareness. It will work with governments to ensure that policies on child labour are aligned with relevant ILO conventions and build their capacities to strengthen the implementation of national and local Plans of Action against child labour.</p> <p>Additionally, the Programme will facilitate the setting up of child labour monitoring systems combined with the convergent delivery of social protection services for families vulnerable to child labour. As informality is widespread in the countries covered by the programme, the labour inspection mechanisms will also be strengthened to intervene in informal workplaces along with building the capacities of trade unions and</p> <p>Implementing partners: UNICEF; Institute for Development Studies (IDS); National, State and Local Governments; Employers' organizations; Workers' organizations; Supply chain actors; Academia and Civil society organizations</p> <p>https://www.ilo.org/newdelhi/whatwedo/projects/WCMS_753276/lang--en/index.htm</p>	Mr. Giovanni Soledad Chief Technical Adviser Email: soledad@ilo.org	

06	<p>ILO Skills 21 Project (Skills 21 – Empowering citizens for inclusive and sustainable growth) – 1 January 2017 – 31 May 2022</p> <p>Skills 21 project is a joint initiative of the Government of Bangladesh and the International Labour Organization (ILO), funded by the European Union. The project seeks to increase productivity and employment opportunities through an environmentally conscious, inclusive, demand-driven, and interlinked skills development system responding to the needs of the labour market.</p> <p>The project has partnerships with government TVET institutes in Khulna and Bagerhat who provides short courses on skills development for different market driven courses.</p>	<p>Kishore Kumar Singh, Chief Technical Adviser; e-mail: dhaka@ilo.org</p>	
07	<p>The upcoming project of FAO– on Fishing and Aquaculture (shrimp is integrated); climate change-focused community based interventions will be implemented in Khulna and Satkhira.</p> <p>Given that FAO considers child labour and women’s empowerment as an integrated issue for all its projects as part of responsive business and ensuring compliance with international standards</p>	<p>Begum Nurunnahar, National Operations Officer, FAO in Bangladesh</p>	
08	<p>Jiboner Jannya Project, World Vision Bangladesh– till December 2021</p> <p>The project is being implemented in Khulna Sadar and in Mongla Upazila of Bagerhat district. It aims to help about 51,000 adults and children in the region by withdrawing them from the worst forms of child labour, abuse, neglect, and exploitation.</p> <p>They have schools and income-generating support for the parents.</p>		
	<p>Safe Aqua Farming For Economic And Trade Improvement (SAFETI) – Sept 2016-Sept 2021</p> <p>Funded by USDA, the project aims to boost livelihoods, increase productivity in the shrimp and prawn industries, and improve food quality and safety in Bangladesh.</p> <p>The project is being implemented in the southern region, including Khulna, Bagerhat, Jessore and Satkhira districts of the Khulna Division.</p> <p>Five organizations: Community Development Centre (CODEC), Thengamara Mohila Sabuj Sangha (TMSS), Bangladesh Shrimp and Fish Foundation (BSFF), WorldFish, and Auburn University are involved in the implementation of this project.</p> <p>Target Beneficiaries: Smallholder Producers, Handlers/Aggregators, Suppliers And Processors In The Shrimp And Prawn Industries</p>	<p>contact information: john dorr (jdorr@winrock.org)</p>	

2. Conclusions and recommendations

The mapping finds that there have been significant changes in the shrimp sector in recent decades in different considerations. This sector is a priority sector for the government as an export earning source, and different policy and regulatory measures have been taken by the government. The sector also witnessed steady growth in terms of production and exports, until recent shocks by COVID 19 and Cyclone Amphan.

There has also been a change in terms of compliance with labour laws, as has been shared by different government and non-government stakeholders. Meanwhile, a number of factories have appointed 'Compliance Officers' to look after labour laws and human resource management.

As a positive trend, the shrimp processing plants are now almost child labour free. However, there seems a tendency of overlooking the issue of child labour in other tiers of the supply chain, particularly in the fry catching. Catching of shrimp fry or post-larvae has been banned in Bangladesh, but without any comprehensive measures for alternative and sustainable livelihoods for those engaged in fry catching as the only livelihood option. In such a context, this mapping exercise assumes that while local level government stakeholders might be supportive of the project of Global March provided that sustainable livelihoods options are there, there might have resistance from the national level policymakers and government officials, since shrimp fry catching is not on the list of hazardous work and their priority target is now to reduce the worst form of child labour. The government now looks forward to the cooperation in reducing the hazardous form of child labour as recognized by the government and where huge numbers of children are engaged, such as the dry fish sector.

However, a strong argument for this project could be made relating to the government declared a ban on shrimp fry catching and the policy to shift towards hatchery production of fry and fingerlings from the wild fries. Because, to ensure effective implementation of the ban and to protect the fry catching communities from the negative consequences of government plans on hatchery production, there needs to address the livelihoods concerns of the fry catchers.

In one hand, fry catching is illegal and independent nature of work beyond the legal protection of labour laws. But, children get involved in fry catching as the only option for livelihoods and supporting the family. Hence, to eliminate child labour from this tier, and from other tiers, there needs comprehensive efforts linking with sustainable livelihood opportunities for the adult family members and education and skill building initiatives for the adolescents of the targeted communities before withdrawing the children from the work.

This mapping finds the need for further investigation in several areas. There are several monitoring and inspection agencies, such as Department of Inspection for Factories & Establishments (DIFE), and Department of Fisheries. Buyers also do inspection. There also different agencies providing licenses, such as Union Parishad, Department of Fisheries, Fire Service Department, and Department of Environment etc. However, very little information about the certification process could be gathered during the interviews. There needs further information about how the issues of child labour is attached to certification process and how different codes of conduct developed by the Fisheries Department are applied in practice.

As interview with one national level NGO informs that with the support of Dutch Embassy, Ministry of Commerce is implementing a project on standardization in the shrimp sector. There needs to explore the scope of collaboration with such project.

Given that there is a direct connection between climate change impact on livelihoods opportunities and on child labour, and Bangladesh has strong networks on climate change works, the project might consider exploring scope of collaboration with the climate change actors.

Since different kinds of actors are involved on the issue with different interests and influence, there needs to adopt a multi-stakeholder approach engaging both government, NGOs, private sectors and their associations, communities and the children themselves. There needs integrated approach to eliminate child labour involving both communities and the government, as their needs both community motivation and livelihood support to the families.

Recommendations

Informed by the analysis as presented in the above sections, the mapping puts forward following recommendations:

- To develop a statistical database on the number of children engaged in different kinds of child labour including in shrimp supply chain and prepare socio economic profile of their households to address the existing data gaps and guide in designing evidence based interventions.
- To do a power analysis of relevant stakeholders (local and national government officials, local government representatives, national level policy makers, business associations, such as Bangladesh Frozen Food Exporters Association-BFFEA, local business associations, such as Aratdar Samity, Matsya Traders Association, NGOs (Bangladesh Fish and Shrimp Foundation) and understand their position on the issue and design influencing interventions engaging them accordingly.
- To organize the children, parents, local community women and men in groups to make them aware and sensitize about the issues of child labour, its adverse consequences and their rights as recognized by different national and international instruments.
- To design interventions engaging the employers of children, such as shrimp farmers, fishers, and traders, such as aratdars, depot owners, ice mills, retailers etc. to make them aware about child labour, its consequences, and their responsibilities as derived from different national and international instruments.
- To take interventions in activating local level business associations including small shrimp farmers associations to strengthen their negotiating role in promoting their businesses in sustained and socially responsive manner.
- To build linkage with existing social safety net programmes and ensuring that the targeted children and their families access them, and explore possible collaboration with different initiatives working in shrimp sector or on child rights and child labour issues, such Jiboner Jonno Project of World Vision Bangladesh, UCEP and local TVET institutes through ILO Skills 21 Project.

- To carry out analysis on the adequacy and effectiveness of the available social safety net programmes for targeted groups in targeted areas and do national level policy advocacy on special allocation for the targeted communities.
- To identify like-minded parliamentarians and influence them in engaging budget advocacy for the special allocation for the social protection of the targeted children and their families.
- To mobilize locally active and trusted NGOs and CSOs in disseminating message about the child labour issues focusing on internationally recognized concept of child labour that can address the issue of social and cultural acceptability of child labour.
- To carry out collaborative policy advocacy to bring shrimp fry catching under government regulations and ensure enlistment of fish/shrimp fry catching as hazardous works.
- To engage in ongoing process of reviewing of National Action Plan on Elimination of Child Labour to ensure that the concerns of child labour in shrimp supply chain are adequately addressed.
- To devise strategy activating government led local monitoring bodies, such as district and upazila based child welfare boards.
- To explore the opportunities to engage with buyers at international level to influence them for special project targeting the children in shrimp fry catching from CSR (Corporate Social Responsibility) perspectives.

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