



TPFA ANNUAL LABOUR REPORT 2025

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Labour Annual Report

Thai Pet Food Trade Association 2025

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Executive Summary

In 2025, the Thai Pet Food Trade Association continued to advance its labour-related efforts with objectives aligned with international labour standards and the expectations of business partners. These efforts were implemented through the Good Labour Practices (GLP) framework in collaboration with government agencies, the private sector, civil society organizations, and international organizations to promote sustainability and strengthen the positive image of Thailand's tuna supply chain.

The Association conducted GLP monitoring visits to member companies, with participation from the International Labour Organization (ILO) and civil society organizations as observers to enhance transparency and confidence. The 2025 monitoring results indicated a continued decline in non-compliance with labour laws and GLP principles, with members demonstrating compliance with both legal requirements and GLP guidelines. In addition, all member companies have now covered recruitment costs for their workers. The Association also participated in Human Rights Due Diligence (HRDD) training organized by the Ministry of Justice, and applied the knowledge gained to further improve the effectiveness of the GLP assessment manual.

In March 2025, the Association organized a major multi-stakeholder dialogue to exchange views and strengthen measures to prevent and address child labour and forced labour in line with the United States Trafficking Victims Protection Reauthorization Act (TVPRA) List and ILO principles. This initiative was implemented in cooperation with the Institute of Asian Studies, Chulalongkorn University, the Ministry of Labour, the Thai Chamber of Commerce, allied trade associations, as well as relevant government, private sector, and civil society stakeholders. The Association also monitored developments under the 2025 U.S. Trafficking in Persons (TIP) Report, which ranked Thailand in Tier 2, indicating that while the country has not yet fully met the minimum standards, it has demonstrated significant efforts to do so. Furthermore, the Association expressed its position on the proposed 400-baht minimum wage policy and opposed three draft Labour Protection Acts due to concerns over their direct impact on industrial costs and the potential reduction of Thailand's competitiveness in international markets.

To further promote worker welfare and participation, the Association organized a Social Dialogue Workshop titled "Effective Welfare Committees: Proper Election and Practical Implementation" on 28 November 2025 in Samut Sakhon Province to strengthen cooperation between welfare committees and human resource departments. In addition, the Association participated in World Day Against Child Labour activities organized by the Ministry of Labour on 12 June 2025 through online symbolic participation and disseminated information to member companies to raise awareness of the importance of eliminating child labour and promoting respect for human rights.

Chapter 1

TPFA's Operational Framework

1.1 Overview of the 2025 labour situation in Thailand's seafood processing industry

According to data from the Department of Employment, Ministry of Labour, Thailand's labour market in 2025 recorded an average of approximately 39–39.5 million employed persons, with a relatively low unemployment rate of around 1–2 percent, reflecting a generally positive labour market condition. However, Thailand continues to face several structural challenges, including an aging society resulting in a shrinking workforce, 3D jobs (Dirty, Dangerous, and Difficult) that Thai workers are generally unwilling to undertake, and the transition toward automation, which requires substantial investment. These factors have contributed to continued reliance on migrant workers in several key industries.

Currently, Thailand has more than 4.07 million legally registered migrant workers employed across multiple economic sectors, including construction, tourism, manufacturing, fisheries, and agriculture. The Thailand Migration Report 2024 by the ILO and IOM further indicated that approximately 192,000 registered migrant workers are employed in the fisheries and seafood processing industries. This demonstrates the critical role of migrant labour in labour-intensive operations, such as sorting, cleaning, and processing raw materials, which are tasks that Thai workers are generally less willing to undertake.

Data from the Thai Pet Food Trade Association shows that, when comparing workforce figures between 2024 and 2025, the total number of workers in the industry increased from 48,945 in 2024 to 55,481 in 2025 (+13.3%). Both Thai and migrant labour numbers increased, with Thai workers rising from 16,578 to 17,515 (+5.6%) and migrant workers increasing from 32,367 to 37,966 (+17.3%). This reflects the industry's continued growing reliance on migrant workers to support increasing orders and expanding production capacity.

Overall, it is evident that Thailand's labour market remains significantly driven by migrant workers across several key industries, particularly manufacturing, fisheries, and seafood processing, where there is a continuous demand for large numbers of workers. Although employment levels and unemployment rates remain stable, challenges such as an aging population, insufficient Thai workers for specific job categories, and technological transformation require systematic migrant labour management, skills development, and continued enhancement of labour standards. These remain critical priorities for both the government and the private sector to ensure long-term industrial competitiveness and to meet the increasing workforce demand.

Sources:

Ministry of Labour's Labour update <https://www.mol.go.th/academician/รายงานการณ์ต้านแรงงาน>

TTIA 2025 GLP Visit <https://thaituna.org/report-labour/>

THAILAND MIGRATION REPORT 2024 <https://thailand.un.org/en/285915-thailand-migration-report-2024>

1.2 Policies and Guidelines

To serve as a guideline for the association's operations and for members to comply with Thai law and ethical labour standards, covering both land and sea labour, in 2024 the association has set important guidelines emphasizing responsible and transparent practices, aiming to enhance integrity and sustainability in the industry. Key initiatives included:

1.2.1 Guideline based on the Fair Recruitment Principles

Principles and rationale

Due to pressure from buyers and NGOs advocating for the Zero Recruitment principle (which requires employers to cover all recruitment fees), employers face increased cost burdens. Additionally, paying all fees could potentially lead to risks of forced labour and human trafficking. In response, the association has engaged with relevant agencies to discuss the Fair Recruitment principle, aiming to identify fair and appropriate cost-sharing mechanisms for both employers and employees. As a result, the Fair Recruitment Guideline was developed in collaboration with two member associations. The guideline, created on February 12, 2024, incorporates Thai law, the laws of the country of origin, and the recruitment principles set forth by the International Labour Organization (ILO). This guideline serves as a framework for labour recruitment, as outlined below:

Guideline based on the Fair Recruitment Principles (12 Feb 2024)

No.	Topic	Guideline clarification
1	Endorsement to recruitment that complies with the law, with an employment contract, no forced labour, and no human trafficking.	Members of the TTIA/TPFA endorse the ILO's Fair Recruitment principles, which prohibit the charging of fees or costs related to labour recruitment. Employment must be based on contracts, without discrimination or forced labour. There should be a grievance mechanism, and employers may be responsible for actual recruitment costs, which should be transparent and verifiable.
2	Endorsement to consultations to adjust recruitment costs and fees to be fair to all parties	The TTIA/TPFA endorses tripartite consultations between employers, employees, and the government on recruitment costs based on the principles of the ILO to ensure that the costs are fair and reasonable.
3	Clear clarification of costs in the country of origin to avoid corruption issues.	Members of the TTIA and the TPFA will not endorse the payment of costs that are related to bribes, unclear, undisclosed, or illegitimate expenses, as they carry the risk of being associated with human trafficking or forced labour. This includes any costs that cannot be identified or justified.
4	Endorsement to consultation between employers and workers regarding who should bear the cost of obtaining passports.	The TTIA/TPFA endorses consultations between employers and workers to determine who should bear the cost of obtaining passports. Passports are considered important personal documents. It is the workers' freedom to use them for travel or personal identification.

No.	Topic	Guideline clarification
		Employers have no right to retain employees' passports, even if they bear the cost of passports.

1.2.2 Guidelines for Purchasing Fish from Commercial Fishing Vessels in Thai Waters

Principles and rationale

The Association's members, as purchasers of fish to process for domestic sales and export, must comply with Thai laws and international obligations. Therefore, the Association has developed guidelines for purchasing fish from commercial fishing vessels in Thai waters for the canned fish industry. These guidelines serve as considerations for purchasing raw materials, with principles and key criteria aligned with sustainable fishing practices. This includes monitoring for illegal fishing activities and transshipment of aquatic animals, ethical labour practices, environmental conservation, and management of aquatic resources to ensure sustainability. In order to comply with the law, the Fisheries Royal Decree B.E. 2558, the Fisheries Royal Decree (No. 2) B.E. 2560, the Labour Protection Act B.E. 2541, the Prevention and Suppression of Human Trafficking Act B.E. 2551, the Labour Protection Act in Fisheries B.E. 2562, the Ministerial Regulation on Labour Protection in Marine Fisheries B.E. 2565, Convention No. 188 on Work in Fishing, 2007 C188 - Work in Fishing Convention, 2007 (No. 188)

which was announced on 4 April 2024 as a guideline for purchasing fish in the country, divided into 3 parts: Part 1 Fishing in Thai waters, Part 2 Environment, and Part 3 Ship labour, as follows:

Guidelines for Purchasing Fish from Commercial Fishing Vessels in Thai Waters for the Canned Fish Industry (4 Apr 2024)

No.	Topic	Guideline clarification
Part 1 Fishing practices in Thai waters		
1	Fishing license, vessel registration, and fishing gears (types of mesh)	Every fishing vessel must possess a valid fishing license certified by the Department of Fisheries or CA-certified agencies. Additionally, they must obtain a permit for vessel registration specifically for fishing in Thai waters. The vessel registration information, vessel type, and fishing gear type must align with the details specified in the approved license.
2	Fishing period	Each vessel must fish only within the authorized period in accordance with the law. Fishing is prohibited during the spawning season or any other periods necessary for the conservation of aquatic animals, in accordance with the Maximum Sustainable Yield (MSY) values announced by the

No.	Topic	Guideline clarification
		Department of Fisheries. Fishing is also prohibited during bay closure periods.
3	Commercial fishing zones	All fishing vessels must operate within designated fishing zones as stipulated by law , avoiding IUU fishing activities and refraining from fishing in conservation areas or closed bays.
4	Prohibition of at-sea transshipment	Fishing vessels and transport vessels are prohibited from engaging in at-sea transshipment unless conditions specified by law are met. This aims to prevent the transshipment of IUU aquatic animals or illegal labour practices.
5	Logbook	<p>Every fishing vessel must maintain a logbook containing:</p> <ul style="list-style-type: none"> - Vessel name - Vessel registration/identification mark - D/M/Y of departure for fishing – embarkation port – province - D/M/Y of return to port – disembarkation port – province - In case of using tranship vessels: identification mark of the tranship vessel - date/month/year of loading aquatic animals onto the tranship vessel - transhipment area (latitude, longitude)- quantity of transhipped aquatic animals (in kilograms) - Total quantity of aquatic animals caught during the fishing operation (in kilograms) - Types of aquatic animals (in kilograms) - Encounters with rare marine animals: turtles, whales, dolphins, whale sharks - Bringing aquatic animals to port: port name, province, quantity (in kilograms)
6	Vessel Monitoring System (VMS) installation	<ul style="list-style-type: none"> - Commercial fishing vessels with a gross tonnage of 30 tons or more must have a vessel monitoring system installed and operational throughout the fishing operation, from departure to return to port. - Commercial fishing vessels with a gross tonnage of less than 30 tons must submit a logbook upon request.
7	Reporting from Port In - Port Out. Controlling Center (PI-PO) by Certification Authority (CA)	<ul style="list-style-type: none"> - Commercial fishing vessels with a gross tonnage of 30 tons or more must report their entry and exit through the PI-PO (Port in – Port out) center and maintain a logbook. - Fishing vessels with a size of 10 gross tons or more that utilize fishing gears such as bottom pair trawls, bottom otter trawls, beam trawls, surrounding nets, anchovy surrounding nets, and anchovy falling nets must report their entry and exit through the PI-PO (Port in – Port out) center and maintain a logbook. - Commercial fishing vessels with a gross tonnage of less than 30 tons and low-efficiency equipment must submit a logbook upon request.

No.	Topic	Guideline clarification
8	Traceability	In compliance with Thai fishing laws and regulations, all vessels must compile data as requested to establish a database for traceability.
9	Health standards on fishing vessels	<ul style="list-style-type: none"> - Commercial fishing vessels with a gross tonnage of 30 tons or more - Fishing vessels with a size of 10 gross tons or more that utilize fishing gears such as bottom pair trawls, bottom otter trawls, beam trawls, surrounding nets, anchovy surrounding nets, and anchovy falling nets <p style="color: red; margin-left: 20px;">must establish health standards on board and ensure the proper handling and preservation of aquatic animals. The caught fish must be properly preserved, meeting cleanliness and safety criteria without contamination. Additionally, they must obtain certification of compliance with the standards from the Department of Fisheries (Form No. 3).</p>

Section 2 Environmental aspects

10	Recording of encounters with marine mammals	Every vessel must record encounters with marine mammals in Thai waters. Marine mammals should not be brought onto the vessel except in cases requiring urgent assistance , supported by verifiable evidence.
11	Prohibition of capture, trade, cultivation, possession, and bringing on board a fishing vessel aquatic animals listed in the Wild Animal Conservation and Protection Act, B.E. 2562 (2019) and the Convention on International Trade in Endangered Species of Wild Fauna and Flora: CITES	Every fishing vessel is prohibited from capturing, trading, cultivating, possessing, or bring on board a fishing vessel prohibited aquatic animals. Examples of prohibited species include whales, dolphins, sea turtles, dugongs, whale sharks, corals, giant clams, gorgoniidae, sea anemones, bowmouth guitarfish, manta rays, sawfishes, and devil rays, among others.

ส่วนที่ 3 แรงงานบนเรือ

12	Employment contract	There must be two copies of an employment contract that is written in a language understandable to workers and specifies the living and working conditions on board the vessel. One copy is kept by the employee and the other by the employer.
13	Working hours	Employers must ensure that employees have at least 10 hours of rest within a 24-hour work period and not less than 77 hours within a 7-day work period. Records of rest periods must be maintained for labour inspection.
14	Payment of wages	<ul style="list-style-type: none"> -Payment of wages and holiday pay must comply with legal requirements, with payment at least once a month. If there is a mutual agreement with proportional remuneration based on the value of the catch, payment should be made within three months. -Employers must pay wages monthly. The wages must not be below the minimum wage.

No.	Topic	Guideline clarification
		- Wages must be paid through a bank account, with the employer responsible for transfer fees.
15	Grievance mechanism	There must be a grievance mechanism accessible to fishing workers, labour unions, or any stakeholders for matters related to vessel safety and health hazards.
16	Working environment	Fishing vessels must have certification verifying living conditions and working environments according to legal standards. Clean food and drinking water, sanitary facilities, basic medical supplies and first aid, and safety equipment must be provided on board.
17	Age of seamen	-The minimum age for hired fishing labour is 18 years. -Fishing vessel owners may allow their heir(s) aged not less than 16 years to undergo a fishing apprenticeship, as certified by law.
18	Non-discrimination	Discrimination based on factors such as origin, ethnicity, language, gender, age, disability, physical condition, personal status, socioeconomic status, or political affiliation is prohibited.
19	No forced labour	No coercion or intimidation to perform work or provide services, such as through threats to life, freedom, reputation, property, use of force, confiscation of documents, or unauthorized imposition of debt.
20	No human trafficking	No procuring, buying, selling, vending, detaining, confining, abducting, through abuse of power, or procuring, buying, selling, vending, bringing from, for the purpose of exploitation.

1.2.3 TTIA's Ethical Code of Conduct (11 Feb 2021)

Principles and rationale

Thai Pet Food Trade Association rely on labour as a key factor in the production process and must comply with the provisions of Thai laws and the important requirements of trading partners. Therefore, the association has established a labor ethics policy since its inception in 2013 and updated it in 2022 with the addition of clauses 2 and 10 concerning labor recruitment and human rights, as follows:

1. No Child Labour: No workers under the age of 18 years old is engaged or employed in the processing plants.

Upon recruiting, all applicants shall provide a government-issued passport, identity card and/or work permit for verifying age and legality to work respectively.

2. No Forced and Compulsory Labour: Workers are not required to pay deposits or recruitment fee to the company. Recruitment process shall be compliance with Thai law as well as the laws of country of origin. The company shall not lodge passport, Identity card and/or work permit belonging to the workers. The company shall not withhold any part of workers' salary and benefits.

3. No Discrimination: The company shall not allow any behavior indicating harassment, discrimination or threatening. Education and training on the fundamental of human rights shall be conducted for all personnel concerning the supervision of workers and security practice. The company shall have in place the mechanism and grievance handling to ensure fair and equal treatment of workers.

4. No Human Trafficking: The company shall not involve with any actions that include the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, and for the purpose of exploitation through force labour, modern forms of slavery, slavery and any acts alike.

5. Labour management and administration: The company shall establish human resource management policy and operation plan that will ensure the Company's good governance. The policy and plan shall be effectively implemented on an ongoing basis – with a mechanism to handle grievances and complaints from workers, and that minimum wage and overtime work shall be paid to all workers as defined by Thai Law.

6. Freedom of Association and Right to Collective Bargaining: As permitted by Thai law, the company shall respect the rights of workers for freedom of association and shall provide channels for workers to exchange their opinions with employers.

7. Disciplinary Practices: The company shall not engage in or tolerate the use of corporal punishment, mental or physical coercion, or verbal abuse of workers. Deductions from wages as a disciplinary measure are not allowed.

8. Occupational health, safety and waste management: Occupational health and safety of workers shall be of the utmost concern for the company. At minimum, all legal requirements of related laws must be fulfilled. They include to the provision of necessary personal protective equipment at the employer's expenses, first aid treatment, and assistance for follow-up medical treatment. In addition, waste management system shall be established to ensure the mitigation of impact on environment and nearby communities.

9. Welfare and Benefit: Social security payments are contributed by both workers and company – in accordance with Thai Labour Law – which ensure all workers are eligible for national health care coverage. The company shall register all workers to this scheme from the first day of employment. For the period where the national health care coverage is not yet in effect, the company shall provide adequate medical treatment and expenses to assist any work-related injuries and illnesses.

10. Human rights: The company shall develop and announce its human rights policy and conduct human rights risks and impact assessment and develop measures to prevent and remedies to human rights impact – which include grievance mechanism for those witness and/or affected.

ลิ้งค์: <https://thaipetfood.org/home/Download/2025/Guideline/TTIA%20TPFA%20Labour%20Policy%2011-2-2022.pdf>

Chapter 2

Implementation of the GLP

2.1 Rationale

Good Labor Practices (GLP) are voluntary guidelines developed to encourage businesses and industries to adhere to labor standards. These guidelines focus on promoting good labor practices, and the association monitors this through annual visits to member factories (GLP Visits). The objective of these visits is to assess members' labor practices to prevent child labor, forced labor, ensure adequate welfare, foster cooperation within the workplace, and create a suitable working environment. Furthermore, the association advises members on improving their practices according to GLP principles, drawing inspiration from other member factories to foster mutual support at the industry level. This ensures that members' business operations meet international standards and comply with relevant laws.

2.2 Implementation of Good Labour Practices with members

The Thai Pet Food Trade Association was established in 2019 to support Thailand's pet food industry, with its initial scope focusing specifically on wet pet food products. At the Annual General Meeting held on 20 April 2023, the scope of operations was subsequently expanded to cover all types of pet food products for dogs and cats, in all forms of packaging, reflecting industry developments and product diversification led primarily by the tuna processing sector. At the founding meeting of the Association on 9 September 2019, it was resolved that the Association would adopt the same labour policies as those of the Thai Tuna Industry Association (TTIA), including the promotion and implementation of ethical labour practices under the Ethical Code of Conduct. The Association commenced GLP Visits in 2022 and has continued these activities thereafter.

In 2025, the Association adopted the revised Good Labour Practice (GLP) checklist developed by the Thai Tuna Industry Association as a framework for monitoring labour practices among its members. This aims to support labour standards and strengthen labour management within Thailand's pet food industry through the implementation of GLP Visit activities. The monitoring covers three key areas: Good Labour Practices (GLP), Labour Recruitment, and Human Rights. In addition, the Association has planned pilot activities to monitor supply chain operations through joint field assessments with member companies to evaluate supplier practices both onshore—such as packaging, cans, labels, and various raw materials—and offshore, including fish landing sites and fishing vessels, in alignment with TTIA's approach.

2.3 Overall Results

It was found that 10 out of 10 member companies (100%) were able to comply with all aspects of the guidelines, including: recruitment and employment; child labor; freedom of association, collective bargaining, and cooperation in the workplace; non-discrimination regarding wages, compensation, and working hours; and occupational safety, health, and welfare.

2.4 Changes resulting from the implementation of GLP Visit activities from 2022 to 2025.

from GLP Visits conducted from 2022 to 2025 show continuous improvement among members. Specifically, non-conformities in GLP laws and principles decreased, and no issues were found in 2025. Details are shown on the Table

Labour issues identified \ Years implemented the GLP Visit	GLP Visit (X= some companies were not operating in compliance with GLP)				
	before GLP	2022	2023	2024	2025
1. Member lacks a welfare committee	x				
2. Members do not have migrant workers in their welfare committee.	x				
3. Welfare committee members are not selected through an election process.	x	x			
4. Employment contracts are only available in Thai language.	x		x		
5. Pay-slips are not provided.	x				
6. Deductions from wages are made (for accommodation, utilities, and penalties).	x	x		x	
7. Workers are required to purchase their own work equipment.	x				
8. Workers are provided with restroom access cards.	x		x	x	
9. Pregnancy tests are conducted before employment.	x		x		
10. There is no suggestion box for complaints.	x				

Remark: all 10 member companies are members of the Thai Tuna Industry Association and have been conducting GLP Visits since 2016, data from 2023 shows that most companies have begun to adapt to the association's recommendations regarding employment contracts, the elimination of restroom passes, and the elimination of pregnancy tests during the hiring process. By 2025, no non-compliance with labor laws or GLP practices was found, reflecting the success of the project over three years and the continued development in the industry.

Chapter 3

Ethical Recruitment

3.1 Rationale

Currently, buyer groups and NGOs are pushing for the Employer Pay Principle (EPP), where employers would pay for all recruitment costs, believing it would help reduce forced labor and human trafficking caused by hidden fees. This principle significantly increases the financial burden on employers and may lead to the cost being passed on through other channels.

3.2 Ethical recruitment

The association collects data on migrant worker recruitment costs annually through GLP Visit activities. The figures for 2025 compared to 2024 are shown in the table below.

No.	Expenses in recruiting migrant workers in 2024 – 2025	Number of members	Covered by companies				Changes between 24/25 (%)	
			2024		2025			
			Companies	%	Companies	%		
Expenses in the source countries								
1	Passport obtainment fees	10	10	100	10	100	0	
2	Documents in the countries (accommodation, food, travel costs)	10	10	100	10	100	0	
3	Contract signing, uniforms, smartcards, life insurance on the Myanmar side	10	10	100	10	100	0	
4	Agency service fees in the source countries	10	10	100	10	100	0	
Expenses incurred in Thailand								
5	Visa fees	10	10	100	10	100	0	
6	Work permit fees	10	10	100	10	100	0	
7	Medical checkup	10	10	100	10	100	0	
8	Tests for hepatitis	10	10	100	10	100	0	
9	Food, drinks, and travel costs in Thailand	10	10	100	10	100	0	
10	COVID-19 swab test (ATK, PCR)	10	10	100	10	100	0	
11	Medical checkup for 6 forbidden diseases for work permit application	10	10	100	10	100	0	

No.	Expenses in recruiting migrant workers in 2024 – 2025	Number of members	Covered by companies				Changes between 24/25 (%)	
			2024		2025			
			Companies	%	Companies	%		
12	Costs for 14-day quarantine due to the COVID 19	10	10	100	10	100	0	

Key findings

1. From the table, "Personal Expenses for Migrant Workers" in items 1, 6, and 7, according to the Alien Employment Management Act B.E. 2560 (2017), Section 49 stipulates that "Personal expenses such as passport fees, health check fees, work permit fees, and other similar expenses are the responsibility of the worker." The table shows that several member companies are covering expenses for their workers beyond what the law requires.
2. Ten member companies have already covered all expenses in items 1-12 for their workers (100%), covering all company sizes. The main reason is that clients are placing more importance on managing worker expenses. Furthermore, members want to incentivize migrant workers to stay with their companies longer and reduce costs for them.
3. "Expenses for migrant workers' 14-day quarantine due to the COVID-19 situation": Even though the COVID-19 situation has eased, members still conduct COVID-19 tests if there is suspicion that a worker is at risk of contracting the disease.

Chapter 4

Promotion of Human Rights

4.1 Principles and rationale

Following the Cabinet resolution of November 21, 2017, declaring "human rights" a national agenda item and intending to cooperate with specialized mechanisms of the United Nations, the United Nations Working Group on Business and Human Rights was invited to visit Thailand. This visit aimed to foster a collaborative learning process in implementing the UNGP Guiding Principles on Business and Human Rights. The fundamental principles of the UNGP include: 1) Protect, a duty of the state; 2) Respect, where private companies are responsible for complying with national laws designed to protect and promote human rights; and 3) Remedy, where victims can access remedies through state-provided justice processes, and private companies have a responsibility at the company level to establish consultation processes. The United Nations Working Group on Business and Human Rights in Bangkok visited Thailand on April 4, 2018 (at the invitation of the Thai government, from March 28 to April 4, 2018). During their visit, the Association presented information on its human rights protection efforts. The association has worked with all sectors, including the

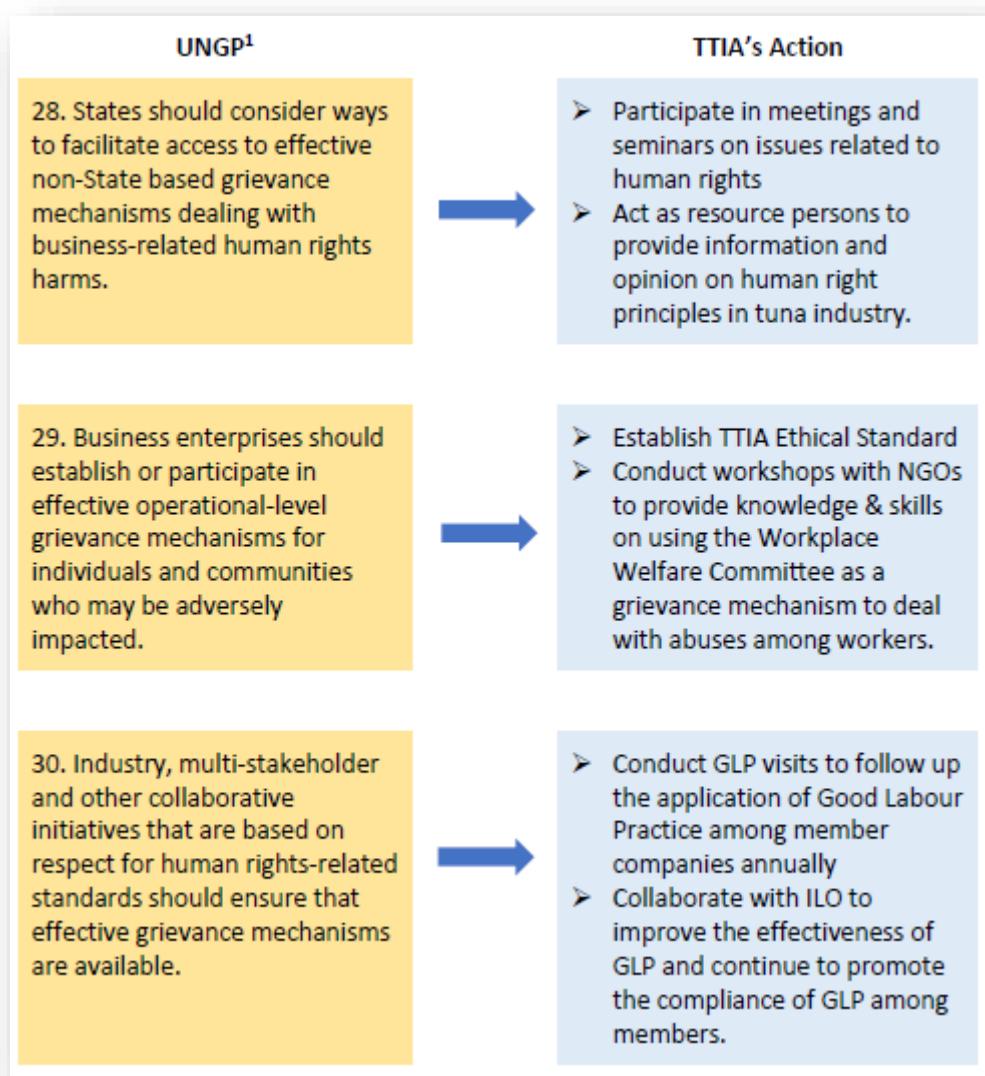
ILO, NGOs, the government, and buyers, based on the principle of listening to problems and then jointly developing and improving solutions. Over the past 4-5 years, its work has covered issues such as human rights, due diligence, and complaint mechanisms.

On April 4, 2018, the United Nations Working Group issued a statement ending their visit to Thailand. The United Nations Working Group praised the actions of the Thai Tuna Industry Association as follows

"We are pleased with the Thai government's decisive action in requiring all commercial fishing vessels to be registered and implementing a new system to control ship notifications, tighten and strengthen labour inspections, and increase fines for non-compliance with labour and fishery laws. The industry association, led by the Thai Tuna Industry Association, has also played a crucial role in promoting ethical labour practices through a Code of Conduct adopted by its members. The association is committed to monitoring compliance with standards set by suppliers, government agencies, and business associations, and has created a platform for consultation with trade unions and migrant worker organizations. We note that risks of forced labour and human trafficking also exist in other sectors in Thailand, such as agriculture and construction, where many migrant workers are employed. Therefore, we urge the government to adopt similar measures to address labour conditions in these industries as those taken in the fishing sector. Additionally, we recommend that businesses operating in high-risk sectors conduct human rights due diligence and reporting in line with the United Nations Guiding Principles on Business and Human Rights." Statement by Mr. Dante Pesce" Statement by Mr. Dante Pesce Mr. Dante Pesce Vice-Chairperson UN Working Group on Business and Human Rights

(from: <http://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=22915&LangID=E>)

The association recognizes the importance of operating according to human rights principles. The guidelines for applying the Guiding Principles on Business and Human Rights (UNGPs) have been studied, focusing on items 28 – 30 as follows:



Related agencies: Human Rights Committee / Department of Rights and Liberties Protection ministry of justice (started 2018-present)

4.2 Human rights activities

The Association has developed a checklist based on the Human Rights Due Diligence Handbook prepared by the National Human Rights Commission, adapting it to the context of the tuna industry. The checklist was approved at the 1/2021 Labour Committee Meeting of the Association on 7 July 2021 and has been used for data collection since 2021. For data collection in 2025, employer representatives are required to submit self-assessment forms along with relevant supporting documents. The Association uses this information as a basis for interviews with employer representatives or human resources personnel. *The findings indicate that all member companies have non-discrimination policies in place for recruitment and employment practices, without discrimination based on gender, religion, or nationality.* In addition, all members have signed the Association's revised Labour Ethics Policy (2022), which incorporates human rights principles covering workers' fundamental rights, as well as policies related

to environmental responsibility and engagement with local communities. Furthermore, some companies have undertaken additional proactive measures, such as establishing welfare committees that include LGBTQ+ representatives, forming committees to prevent sexual harassment, participating in human rights training programs conducted by external organizations, and developing communication materials and awareness-raising activities to share knowledge with workers within factories.

4.3 Training and workshop

- Training on Human Rights Due Diligence (HRDD) for the agriculture and food industry sectors was organized by the Ministry of Justice from 18–19 March 2025. The outcome of this training was the enhancement of the human rights checklist used during the GLP Visit to align with the HRDD principles. This includes questions such as whether companies have human rights-related policies in place and whether assessments have been conducted to identify impacts on surrounding communities resulting from business operations.

Chapter 5

Collaboration with Government, Private Sector, Civil Society, and International Organizations

5.1 Rationale

The labour situation in Thailand is currently facing multiple challenges, including allegations of child labour and forced labour, human trafficking, and increasing pressure from labour-related requirements of trading partners in global markets. As a result, effective labour management requires greater multi-stakeholder collaboration in order to improve workers' quality of life and strengthen the credibility of Thailand's supply chains in the global stage.

5.2 Implementation

The Association works collaboratively with government agencies, the private sector, and civil society through participation in meetings, organization of public forums, promotion of labour-related initiatives, and the provision of feedback on legal or regulatory changes that may affect the competitiveness of the private sector. The joint actions undertaken are as follows:

5.2.1 Addressing child labour and forced labour in the shrimp, fish, sugarcane, and garment sectors (TVPRA List), and downstream products (fishmeal, fish oil, and animal feed)

The United States Bureau of International Labour Affairs (ILAB) has published the TVPRA List since 2009, which includes Thailand. The list identifies goods that may be associated with child labour and forced

labour, including shrimp, sugarcane, and garments, while fishery products were added later, beginning in 2012, due to allegations of forced labour. Although these products are still permitted to be exported to the United States, they may be used as grounds for trade barriers, potentially affecting businesses in the future. According to the report “2024 List of Goods Produced by Child Labour or Forced Labour,” fishery products continue to be cited for forced labour concerns. In addition, downstream fish-related products, including fishmeal, fish oil, and animal feed, have also been added to the list.

- On 10 February 2025, the Association participated in a consultation meeting on the prevention and mitigation of forced labour in downstream fishery products—specifically fishmeal, animal feed, and fish oil—across the entire supply chain. The meeting was organized by the Secretariat of the Command Center for the Prevention of Human Trafficking in Labour, Ministry of Labour.

- On 28 February 2025, the Department of Fisheries submitted a summary of comments on a supply chain study related to forced labour in Thailand’s fishing industry, conducted by Supa Seventy One Co., Ltd., commissioned by ICF Macro, Inc. and the United States Department of Labour (USDOL). The Department indicated that the report contained outdated and inaccurate information and that the research sample did not align with the study’s objectives, resulting in findings that did not reflect current realities. The Association subsequently disseminated the Department’s letter to its members.

- On 13 March 2025, the TTIA and the TPFA, in collaboration with the Ministry of Labour, the Institute of Asian Studies, Chulalongkorn University, the Thai Chamber of Commerce, and partner networks, organized a public forum titled *“Human Rights Challenges, Child Labour, and Forced Labour in Thailand’s Fisheries and Seafood Industry.”* The event was held at the Chumbhot–Pantip Hall, 4th Floor, Prajadhipok–Rambhai Barni Building, Chulalongkorn University. The forum was livestreamed with Thai–English interpretation, and 80 participants attended onsite.

- On 26 May 2025, the Association participated in the signing of a Memorandum of Understanding (MoU) on the prevention of child labour and forced labour in the shrimp, fish, sugarcane, and garment sectors, as well as downstream products (fishmeal, fish oil, and animal feed). The signing ceremony was presided over by Mr. Phiphat Ratchakitprakarn, Minister of Labour. The MoU was jointly signed by the Department of Labour Protection and Welfare, Department of Fisheries, Department of Livestock Development, Office of the Cane and Sugar Board, Thai Chamber of Commerce, Federation of Thai Industries, Thai Fisheries Association, Thai Fishmeal Producers Association, Thai Feed Mill Association, *Thai Tuna Industry Association*, Thai Frozen Foods Association, and three sugar mill associations. This MoU reflects a shared commitment to preventing child labour and forced labour and strengthening public–private collaboration across the shrimp, fish, sugarcane,

garment, and downstream product supply chains (fishmeal, fish oil, and animal feed). The MoU is effective for four years (2025–2029).

- On 21 August 2025, Nissui Co., Ltd. (representing member factories in southern Thailand) hosted a delegation from the Ministry of Labour for random factory inspections to monitor the implementation of corrective action plans addressing child labour and forced labour risks.

- On 18 December 2025, the Association participated in a follow-up meeting organized by the Ministry of Labour to review progress and discuss future actions related to the prevention and mitigation of forced labour in downstream fishery products—fishmeal, animal feed, and fish oil—across the supply chain

5.2.2 TIP Report 2025

Background: The Trafficking in Persons Report (TIP Report) is published by the United States Department of State to assess the human trafficking situation in countries worldwide. The significance of the report lies in its role in encouraging governments to recognize and take concrete actions to address human trafficking. Countries are classified into four tiers (Tier 1, Tier 2, Tier 2 Watch List, and Tier 3) based on their level of compliance with minimum standards for the prevention of trafficking and the protection of victims.

- On 29 September 2025, the United States Department of State released the global rankings in the TIP Report 2025. Thailand remains in Tier 2, indicating that while the country has made significant efforts, it does not yet fully meet the minimum standards. Progress in several areas remains insufficient. The United States recommended that Thailand investigate and prosecute public officials who facilitate human trafficking; enforce the National Referral Mechanism (NRM) to protect cross-border victims; apply a victim-centered and trauma-informed approach at all stages; strengthen enforcement of labour protection laws in the fisheries sector and other industries; enhance officials' knowledge of forced labour indicators; increase the number of interpreters and improve access to interpretation services in shelters; train officials on Section 6/1 and the identification of forced labour victims; upgrade shelters to meet consistent standards; and strengthen monitoring of labour violations and referral mechanisms.

5.2.3 Legal cooperation in Thailand

1. Policy proposal on the adjustment of the minimum wage to THB 400

The government has proposed a nationwide minimum wage of THB 400 per day. However, the private sector, represented by the Joint Standing Committee on Commerce, Industry and Banking (JSCCIB), does not support this policy, citing differences in provincial cost structures, as well as risks related to production relocation and negative impacts on SMEs.

- On 9 December 2024, the TTIA and the TPFA submitted Official Letter No. 023/2024 to the Prime Minister, expressing support for the position of the JSCCIB opposing a uniform nationwide minimum wage of

THB 400 per day. The letter emphasized that economic conditions vary across provinces and that such an increase could lead to job losses and relocation of production bases. It was further proposed that any adjustment to the minimum wage should strictly follow the legal framework under the Labour Protection Act B.E. 2541 (1998), utilizing the tripartite Wage Committee mechanism, and that the minimum wage should not be adjusted more than once per year.

2. Follow-up on four draft labour protection acts (Amendment No.) B.E..... in 2025

- Amendment on Enhanced Maternity Leave Rights (enacted) increases maternity leave from 98 days to 120 days. In cases where a child suffers from medical complications, female employees are entitled to take an additional up to 15 days of continuous leave to care for the child. In addition, spouses are entitled to up to 15 days of leave to assist with childbirth.

Status: The Labour Protection Act (Amendment No. 9) B.E. 2568 (2025) was published in the Royal Gazette on 7 November 2025 and entered into force on 7 December 2025.

- Amendment on the Restructuring of Working Hours (proposed by Mr. Jaras Khumkhainam) proposes limiting working hours to no more than 40 hours per week, providing at least two weekly rest days, and granting 120 days of annual leave after completing 120 days of work.

Status: Under legislative consideration.

- Amendment on Menstrual Leave/Family Care Leave (proposed by Ms. Wannawipa Maison) proposes granting up to 3 days of menstrual leave per month, up to 15 days per year of leave to care for family members or other close persons, and requiring employers to provide breastfeeding facilities at the workplace

Status: Under legislative consideration.

- Amendment on Equal Employment/Annual Wage Adjustment (proposed by Mr. Sia Champathong) stipulates non-discriminatory, equal monthly employment and mandates annual consideration of minimum wage adjustments.

Status: Under legislative consideration.

3. Draft Responsible Business Conduct Promotion Act B.E. ...

On 31 July 2025, the Association participated in a public consultation workshop on the Draft Responsible Business Conduct Promotion Act B.E....., held at Centara Grand at CentralWorld, organized by the Department of Rights and Liberties Protection in cooperation with the European Union (EU). The draft Act is founded on the principle of promoting sustainable business growth, preventing environmental harm and human rights violations, and imposing proactive obligations on businesses in alignment with the United Nations Guiding Principles on Business and Human Rights (UNGPs).

Key provisions of the draft Act include:

- Mandatory application to large enterprises (annual revenue exceeding THB 500 million), requiring due diligence across the entire value chain, both domestically and internationally
- Coverage of human rights, environmental issues, and subsidiary companies
- Requirements for risk assessments, report preparation, and public disclosure
- Penalties of up to THB 5 million for non-compliance

Status: The meeting constituted the first round of public consultation; further developments remain under review.

4. Review of criteria for financial guarantees for the recruitment of migrant workers

- The Association received complaints from its members regarding the high costs of financial guarantees required for the recruitment of migrant workers. Under the current Ministerial Regulation on Licensing and Financial Guarantees for Bringing Migrant Workers to Work for Domestic Employers B.E. 2564 (2021), Clause 16: “employers are required to provide a guarantee of THB 1,000 per migrant worker.” However, the previous regulation, namely the Ministerial Regulation on Application for Licenses, Issuance, Renewal, and Financial Guarantees for Bringing Migrant Workers to Work for Domestic Employers B.E. 2559 (2016), Clause 22, required employers to provide a lump-sum guarantee of THB 100,000 for the recruitment of 100 or more migrant workers, which was considered reasonable and not excessively burdensome for businesses.

Accordingly, the Association submitted formal letters to the Thai Chamber of Commerce and the Federation of Thai Industries, requesting that they propose to the Ministry of Labour a return to the 2016 Ministerial Regulation, in order to reduce employer costs associated with migrant worker recruitment and enhance the competitiveness of Thailand’s export-oriented business sector.

Status: On 25 November 2025, the Cabinet approved revised financial guarantee measures to reduce employers’ financial burden, as follows:

1. Employers recruiting no more than 99 migrant workers must provide a guarantee of THB 1,000 per migrant worker.
2. Employers recruiting 100 or more migrant workers must provide a lump-sum guarantee of THB 100,000.
3. If an employer initially recruits migrant workers under Item 1 and the total number subsequently reaches 100 or more, the employer must provide a lump-sum guarantee of THB 100,000.
4. If an employer has already provided a guarantee exceeding THB 100,000, the Department of Employment shall refund the excess amount.

5. Employers remain fully liable for any damage arising from the employment of migrant workers. If the guarantee is partially deducted, the employer must replenish it to the required amount. If the guarantee is fully depleted and remains insufficient to cover repatriation costs, the employer remains responsible for all remaining expenses incurred in returning migrant workers to their country of origin

5.2.4 Cooperation in labour promotion activities

- Social dialogue workshop at Ban Khung Nam, Samut Sakhon Province, in cooperation with TFFA/LRF

Since 2014, the Association has organized activities emphasizing the role of Welfare Committees and employer representatives in monitoring and addressing issues related to employee welfare, living conditions, and improvements to the factory working environment. These activities have been jointly organized with the Labour Rights Foundation (LRF) (formerly known as the MWRN). Since 2021, the Thai Pet Food Trade Association (TPFA) has co-organized these activities. In 2023 and 2025, the Thai Frozen Foods Association (TFFA) also joined as a co-organizer. The objective is to promote knowledge and understanding of the rights and obligations of migrant workers, and to encourage greater participation of migrant workers as members of workplace welfare committees. To date, this activity has been organized a total of 10 times. The full report is available at: <https://thaituna.org/report-labour/>

D/M/Y	Time / Topics
28 Nov 2025	10. Effective Welfare Committee: Compliance & Practical Improvement.
13 Nov 2024	9. Welfare Committee with complaints, grievances, problems and effective and sustainable solutions.
23 Nov 2023	8. Creating importance for the Welfare Committee Through representatives of employers and employees.
25 Nov 2022	7. Enhance the efficiency of the welfare committee in the workplace.
28 Nov 2021	6. Roles and Duties welfare committee in the situation of COVID-19.

- World Day Against Child Labour activity, in cooperation with the Ministry of Labour

On 12 June 2025, the Association participated in the World Day Against Child Labour 2025, under the theme “Let’s speed up efforts to end child labour everywhere.” The event was conducted online, with the main venue at the 5th Floor Conference Room, Ministry of Labour. The event was presided over by Mr. Aree Krainara, Secretary to the Minister of Labour. Key activities included the joint declaration of commitment and the symbolic expression to end child labour, with live participation at the venue and online broadcasting. The Association also utilized online communication channels, such as a LINE group, to disseminate information to its members and raise awareness of the importance of eliminating child labour in Thailand’s seafood processing industry.

Chapter 6: Key Labour-Related Developments in 2025

Topic	Details
1. Thailand's Ranking in the Trafficking in Persons Report 2025 (TIP Report)	<p>- Thailand has been ranked Tier 2 for the fourth consecutive year.</p> <p>- The report reflects significant progress made by the Thai government and relevant stakeholders in preventing and combating human trafficking, as well as in protecting human rights across various dimensions. However, while the report acknowledges Thailand's efforts, it also notes that several gaps and challenges remain</p> <p>Prioritized Recommendations</p> <ol style="list-style-type: none"> 1. Investigate, prosecute, and punish government officials who facilitate human trafficking. 2. Fully implement the National Referral Mechanism (NRM) to protect cross-border victims and end the detention of victims in immigration detention centers 3. Apply a victim-centered and trauma-informed approach at all stages of the process. 4. Enforce labour protection laws in the fishing industry and other business sectors. 5. Enhance officials' knowledge of human trafficking indicators. 6. Increase the number of interpreters and improve access to interpretation services in shelters 7. Train officials on Section 6/1 and the identification of forced labour victims. 8. Upgrade shelters to ensure uniform standards and comprehensive services. 9. Inspect labour violations and refer cases that may constitute human trafficking to multidisciplinary teams. 10. Establish nationwide standards to ensure freedom of movement for victims in all provinces. 11. Increase public awareness and education, particularly among migrant workers. <p>https://www.mfa.go.th/th/content/thrankchild-labor-th</p> <p>https://www.state.gov/reports/2025-trafficking-in-persons-report/</p>
2. Labour Protection Act (No. 9) B.E. 2568 (2025) and Three Draft Labour Protection Acts	<p>The Labour Protection Act (No. 9) B.E. 2568 (2025) came into force on 7 December 2025, granting employees additional rights as follows:</p> <ul style="list-style-type: none"> - Maternity leave increased to 120 days (from the previous 98 days) - Extended leave to care for a child in cases of illness or medical complications, with an additional up to 15 days of consecutive leave.

	<p>- Spouses are entitled to up to 15 days of leave to assist their wives during childbirth.</p> <p>In addition, three draft Labour Protection Acts are currently under consideration:</p> <ol style="list-style-type: none"> 1. Draft amendment on reduced working hours (proposed by Mr. Jaras Khumkhainam) proposes to limit working hours to no more than 40 hours per week, at least two weekly rest days, and to grant 120 days of annual leave after completing 120 days of work. 2. Draft amendment on menstrual leave / family care leave (<i>proposed by Ms. Wannawipha Maison</i>) proposes to provide up to 3 days of menstrual leave per month, up to 15 days per year of leave to care for family members or close persons and requires employers to provide breastfeeding facilities in the workplace. 3. Draft amendment on equal employment / annual wage adjustment (<i>proposed by Mr. Sia Champathong</i>) mandates equal monthly employment without discrimination and requires annual consideration of minimum wage adjustments. <p>https://prachatai.com/journal/2025/11/115426 https://www.infoquest.co.th/2025/544944</p>
3. Increase in the Minimum Wage to THB 400 in Bangkok and the Hotel & Entertainment Sectors	<p>On 1 July 2025, the Wage Committee issued a notification on Minimum Wage Rates (No. 14), establishing a new minimum wage of THB 400 per day for Bangkok, Rayong, Phuket, and for the hotel and entertainment sectors nationwide. Minimum wages in other areas were set at varying rates (Nakhon Pathom, Samut Prakan, Samut Sakhon: THB 372; Hat Yai District: THB 380; Saraburi: THB 357; Suphan Buri: THB 350; and Kanchanaburi: THB 352)</p> <p>https://prachatai.com/journal/2025/07/113539</p>
4. Thailand's Ratification of ILO Convention No. 155 on Occupational Safety and Health (1981)	<p>On 10 June 2025, Mr. Phiphat Ratchakitprakarn, Minister of Labour, met with Mr. Gilbert Houngbo, Director-General of the ILO, to formally ratify ILO P155 Protocol of 2002 to the Occupational Safety and Health, together with the 2002 Protocol. This ratification represents a significant step in raising labour safety and occupational health standards in Thailand.</p> <p>https://prachatai.com/journal/2025/05/113064</p>
5. Postponement of Contributions to the Employee Welfare Fund	<p>On 15 September 2025, a Ministerial Regulation on contribution and employer matching rates for the Employee Welfare Fund B.E. 2568 (2025) was issued. The regulation stipulates that contributions will take effect on</p>

	<p>1 October 2026, postponing the original implementation planned for 2025. The postponement reflects concerns from many employers regarding cost burdens and their lack of readiness to implement the scheme.</p> <p>https://www.labour.go.th/index.php/74916-2025-09-15-07-06-34</p>
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Chapter 7: Future Action Plan

Labour ethics and human rights are core policies that the Association actively promotes and continuously encourages its members to implement in compliance with national laws and international principles, and to extend these practices throughout the supply chain. To this end, the following action plans and collaborative initiatives with relevant stakeholders have been established:

Action Plan

Topic	Actions
1. Policies and guidelines	<ul style="list-style-type: none"> - Disseminate information and follow up on the implementation of labour-related policies and operational guidelines among members.
2. Implementation of the GLP	<ul style="list-style-type: none"> - Organize GLP Visits to inspect and assess member factories. - Expand GLP Visits throughout the supply chain, including onshore suppliers, e.g., boxes, cans, paper, vegetable oil, labels, and offshore operations, e.g., fishing vessels. - Raise awareness of labour inspections in the fisheries sector from which members source raw materials, with the Association participating as an observer
3. Ethical labour recruitment	<ul style="list-style-type: none"> - Follow up and support members' compliance with ethical recruitment practices in accordance with Thai law and the laws of countries of origin. - Disseminate DIWA's labour recruitment study to enable members to engage with buyers and promote the principle of fair shared responsibility for recruitment fees.
4. Promotion of human rights	<ul style="list-style-type: none"> - Follow up on members' implementation of the United Nations Guiding Principles on Business and Human Rights (UNGPs). - Participate in meetings and training sessions to enhance knowledge and capacity on human rights issues.
5. Collaboration with government, private sector,	<ul style="list-style-type: none"> - Participate in meetings and provide input on addressing forced labour in fishery products listed under the TVPRA List and downstream products

Topic	Actions
civil society, and international organizations	<p>(fishmeal, fish oil, and animal feed).</p> <ul style="list-style-type: none"> - Serve as a committee member in the S2SR Phase 3 project and seek budgetary support for labour-related activities in collaboration with the TFFA, including GLP Visits, GLP training, and social dialogue workshops. - Monitor and provide feedback on draft legislation, such as the Labour Protection Act (Amendment.....) B.E. ... in 2025.