

SHRIMP PROCESSING AND RELATED SECTORS IN INDIA

Overview of Approach and Data Sets Submitted to GFEMS 2022

The purpose of this briefing is to provide a high-level explanation of Envisage’s approach to the data collection work they provided for the 2021-2022 Shrimp Processing Sector Analysis of Labor violators in India. This is an overview of how the various data sets were found, chosen, and determined as potentially useful, based on the limited amount of information on violators in this sector. It also addresses our rationale that eventually was submitted to GFEMS data scientists for their modeling work and the subsequent analysis.

BACKGROUND RELATED TO THE RATIONALE

India’s Statistics on Reported Human Trafficking Cases

It is reported that 8M people live in modern slavery in India – with numbers significantly on the rise based on the current global pandemic and related economic hardships.¹

India has a reported 16M fishers and fish workers of which at least half are reported to be women.^{2,3}

Juxtaposed to these numbers is a relatively miniscule number of reported bonded labor cases across all sectors, as reported under the BLSA. In 2018, the cases numbered only 778 for the entire country, and only 1,155 cases reported by law enforcement in 2019. The number of cases resulting in convictions in 2019 numbered only 33 with just 52 people convicted. This figure is across all sectors and country wide. (Uttar Pradesh accounted for 80% of all cases.)⁵

Finding government reported slavery cases, specifically for the Shrimp Industry, appears desperately difficult for the assignment of finding a violator sampling list.

On the victim side, figures by NGOs of people removed from bonded labor situations in each geographical area put estimates as high as 1,500 laborers within an 11-month period over more than 30 tactical operations. In 2012, nearly 652 children were found to be employed to clean fish on the Sasoon Dock in Mumbai in a single operation. Of this number 447 were girls and 596 were between the ages of 4 and 14 years old.⁵

Processing sector labor violations, specifically as it relates to child labor, are particularly present in ‘tier 2’ processing operations. This includes shrimp peeling ‘sheds,’ that are part of the extended supply chains.⁶

It is commonly understood that identifying this at-risk population and the companies that perpetuate this form of labor abuse is truly a “wicked situation” and requires a broader more creative systems approach to begin developing a solution for this complex problem.

1 <https://www.globallslaveryindex.org/2018/findings/country-studies/india/>

2. https://nfdi.gov.in/PDF/National_Fisheries_Policy_2020.pdf

3. <https://dof.gov.in/sites/default/files/2020-08/HandbookonFS2018.pdf>

HANDBOOK ON FISHERIES STATISTICS 2018

Department of Fisheries, Ministry of Fisheries, Animal Husbandry & Dairying, Govt. of India, New Delhi, September 2019

4. *International Journal of Marketing & Human Resource Research* e-ISSN: 2746-4040 Vol. 2, No. 2 April 2021

Economic and Health Hazards of Women Fish Vendors in Chennai District of Tamil Nadu, India

Jaheer Mukthar KP, Raju.V, Sivasubramanian K

5. <https://www.state.gov/reports/2021-trafficking-in-persons-report/india/>

6. Unmasking the silent role fisherwomen play in the small-scale fisheries local value chain in India, SAMANTHA D’SOUZA, December 2020

“Wicked situations are those where identifying problems is not easy and selecting good solutions is even more difficult.” Bob Williams and Sjon van 't Hof⁷

To this end, ENVISAGE approached the work assignment using a systems approach. Mapping and reviewing literature that would shed light on the situation and would allow us to frame the India Shrimp Market labor issue in a context built upon our years of experience in SE Asia where labor abuses are often difficult to unravel.

We began with an overview of the Fishing and Seafood related industries based on Government Census data, (Marine Fisheries Census 2010 India) Targeted Studies and reports by Anti-Human Trafficking groups working in this sector. Some key take aways from the census and studies that helped form our approach include the following:

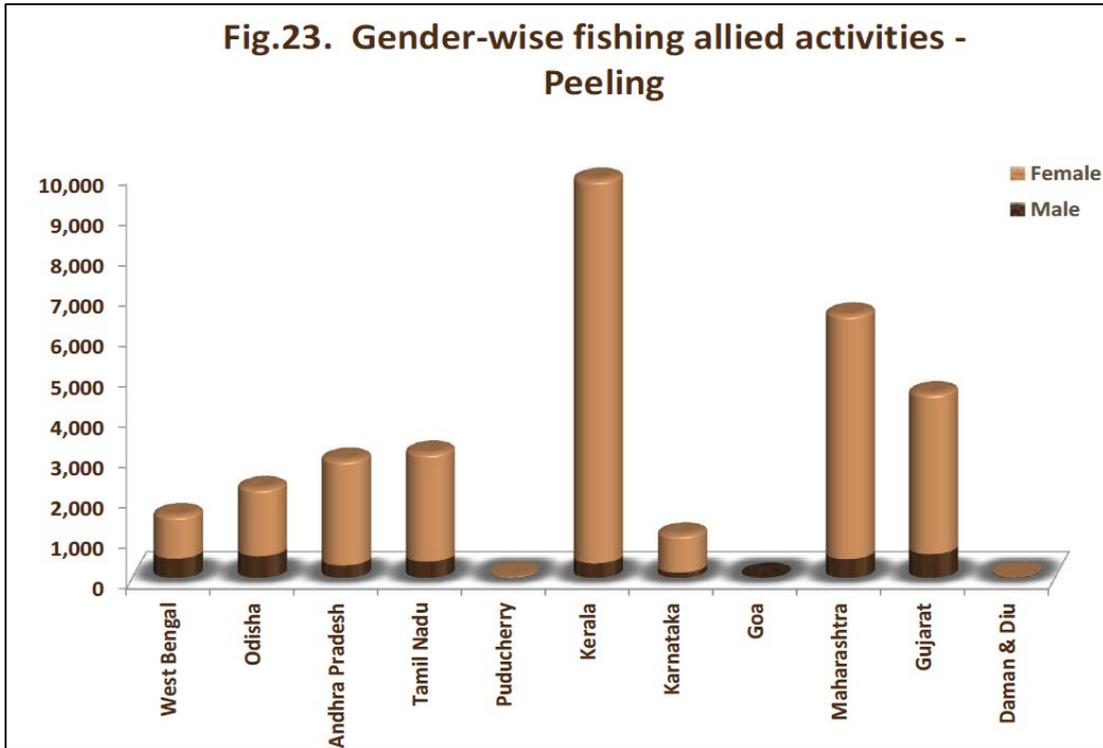
- We need to pay attention to 9 maritime states and 2 union territories
- Target the 3,288 marine fishing villages, with 1,511 marine fish landing centers
- The total marine fisherfolk population is estimated to be about 4 million people comprising of 864,550 families, of which nearly 76% were Hindus
- Nearly 32% of the adult fisherfolk have memberships in co-operatives
- In the marine fisheries sector, there are 194,490 crafts in the fishery out of which 37% are mechanized, 37% are motorized and 26% are non-motorized.
- Out of a total of 167,957 crafts fully owned by fisherfolk, 53% are non-motorized⁷
- Tamil Nadu accounted for 21% of active fishermen followed by Odisha at 16.4% and Andhra Pradesh at 15.2%.
- About 61.1% of the fisherfolk are engaged in fishing and allied activities and this was maximum for Andhra Pradesh (76.2%) and minimum for Kerala (45.8%).
- Among the fisherfolks engaged in fishing allied activities, 36.5% are engaged in marketing of fish, 32.6% are working as laborers and 14.2% are engaged in making and repairing of nets.⁷
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- Nearly 81.8% of the fisherfolks engaged in marketing of fish are women.
- About 88.1% of the fisherfolk engaged in curing and processing are women.
- **About 89.6% of the fisherfolk engaged in peeling are women.**
- About 89.6% of the fisherfolk engaged in peeling are women.
- Among the marine fishermen households 15,674 families are engaged in different aquaculture practices, **of which 42% are engaged in Prawn Culture⁷**

Occupation Profiles by State and Gender involved in Prawn activities – 2010 Census

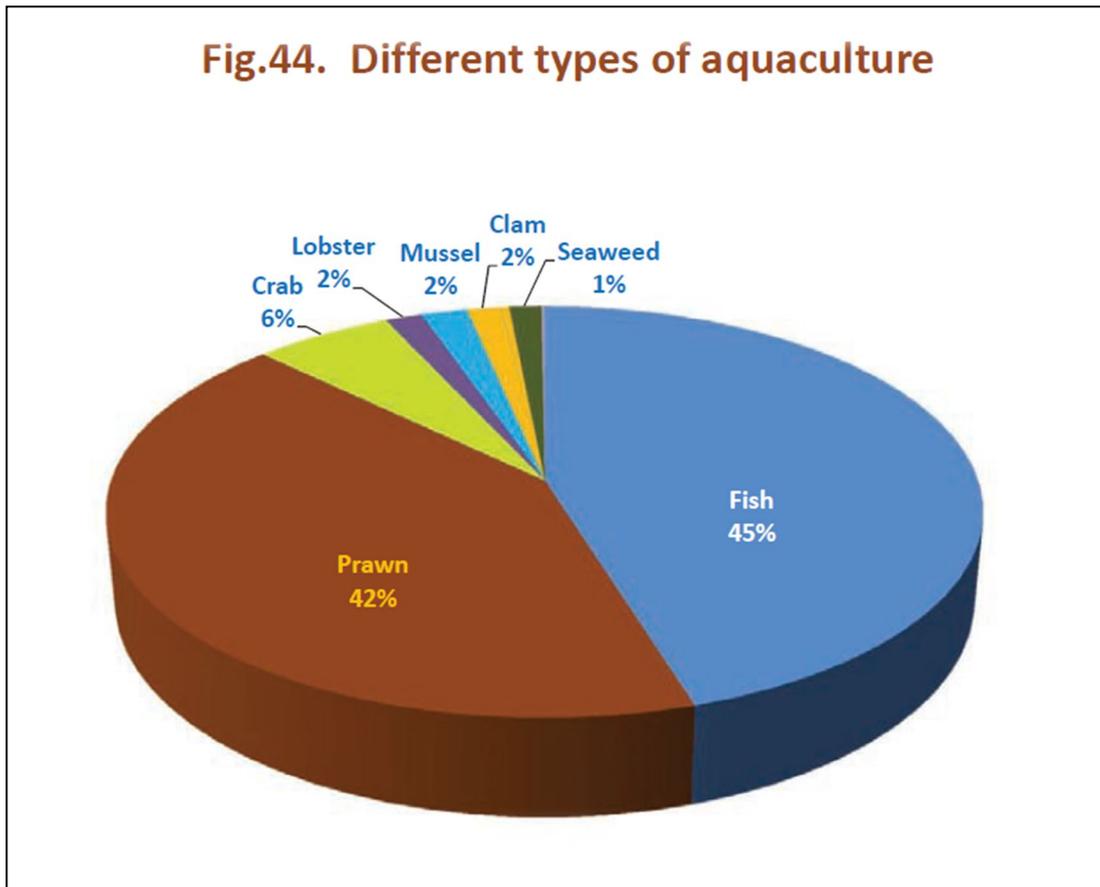
| State | Male | Female | Total |
|----------------------|--------------|---------------|----------------------|
| • West Bengal | 478 | 1,054 | |
| • Odisha | 539 | 1,661 | |
| • Andhra Pradesh | 308 | 2,596 | |
| • Tamil Nadu | 401 | 2,675 | |
| • Puducherry | 4 | 37 | |
| • Kerala | 360 | 9,457 | |
| • Karnataka | 127 | 931 | |
| • Goa | 0 | 0 | |
| • <u>Maharashtra</u> | 466 | 6,027 | |
| • Gujarat | 589 | 3,961 | |
| • Daman & Diu | 14 | 14 | |
| • Total | 3,286 | 28,413 | <u>31,699</u> |

7. Wicked Solutions: A Systems Approach to Complex Problems, Williams, Bob, van 't Hof, Sjon

8. Marine Fisheries Census 2010 India, Government of India, Ministry of Agriculture, Central Marine Fisheries Research Institute



Marine Fisheries Census 2010 India



Marine Fisheries Census 2010 India

Officially reported data is difficult to find, but when we look at older data and tendencies, as compared to narrative stories of 2020 like those below, we find similarities that indicate the problem is still as pervasive and the gender and age ratios still as dangerous as those reported within the last 10 years.

- In the 2020 case of the tragic fire accident that resulted in the deaths of five tribal students who had skipped studies to work in a shrimp processing unit in Andhra Pradesh to support their families, we start to see a grim picture of the rising rate of school dropouts and its impact on students during the current COVID-19 pandemic.
- The area government suspects the absence of nearly 50,000 students from the education system from the Scheduled Tribe and Scheduled Caste communities alone.⁸ Similarly in 2020, when a bus was sent from Rayagada district to bring back laborers from the same locality in Guntur district of Andhra Pradesh, there were more surprises in store.⁹ In one case, “As many as 33 migrant laborers from Rayagada district had boarded the bus to return home. Shockingly, we found that 15 of them were minor, mostly tribal. Seven students had given up studies afresh,” said Gunupur MLA Raghunath Gamango.

In addition, we reviewed the CSOs, and related groups associated with providing advocacy to this sector. The partial list is as follows:¹¹

- Bachpan Bachao Andolan
- Prajwalaindia
- My Choice Foundation
- Ministry of Women and Child Development
- Bandhua Mukti Morcha Bonded Labour Liberation Front
- Angels in the Field
- Astha Mahila Bal Vikash Sansthan
- Bachpan Bachao Andolan
- Destiny Foundation
- Guria Swayam Sevi Sanstham
- PEOPLE UNITING TO STOP HUMAN TRAFFICKING (PUSH)
- Dearah Association for Social and Humanitarian Action – ASHA
- Rescue Foundation
- Gram Swaraj Movement

Networking organizations:

- Asian Fisheries Society (AFS)
- Development Alternatives with Women for a New Era (DAWN)
- International Collective in Support of Fish workers (ICSF)

Even through these groups and networks, we have still been unable to find named firms that have been identified as traffickers or human slavery labor violators.

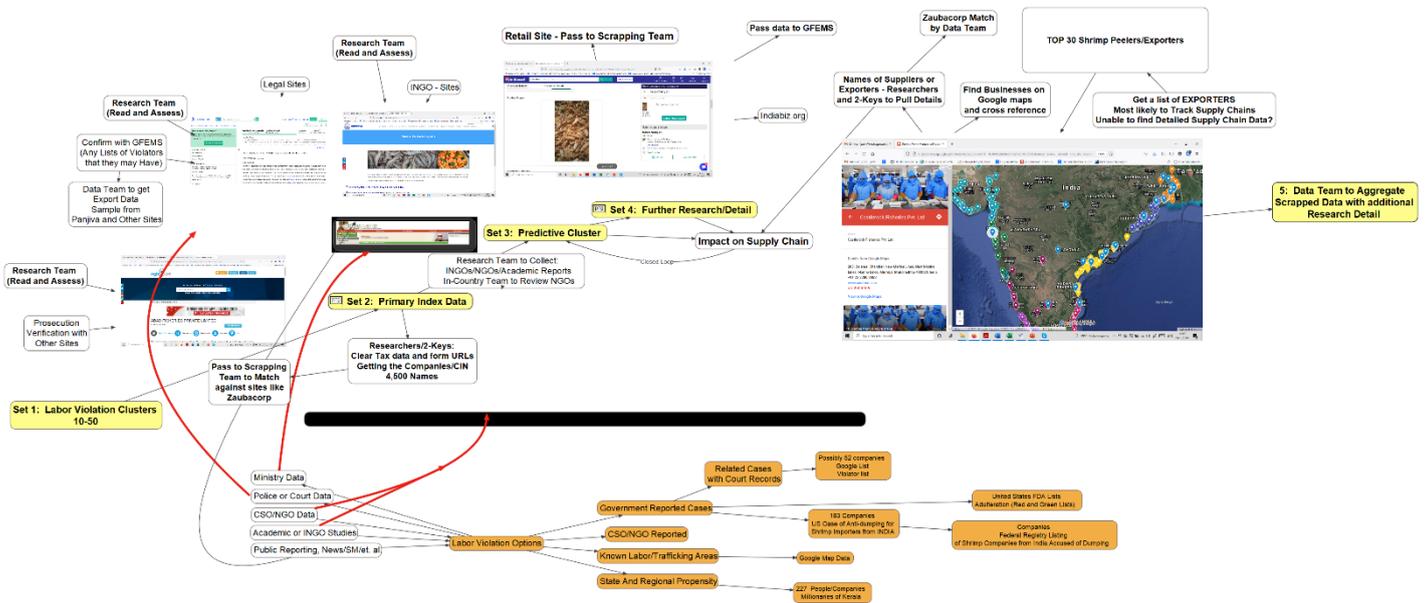
8. [The Hindu](#), Odisha school dropouts among tribals, Dalits very high, Satyasundar Barik August 03, 2021

9. [The Hindu](#), Six migrant workers killed in explosion, July 31, 2021

10. [APNews](#) Indian police rescue 17 children employed illegally, August 26, 2021

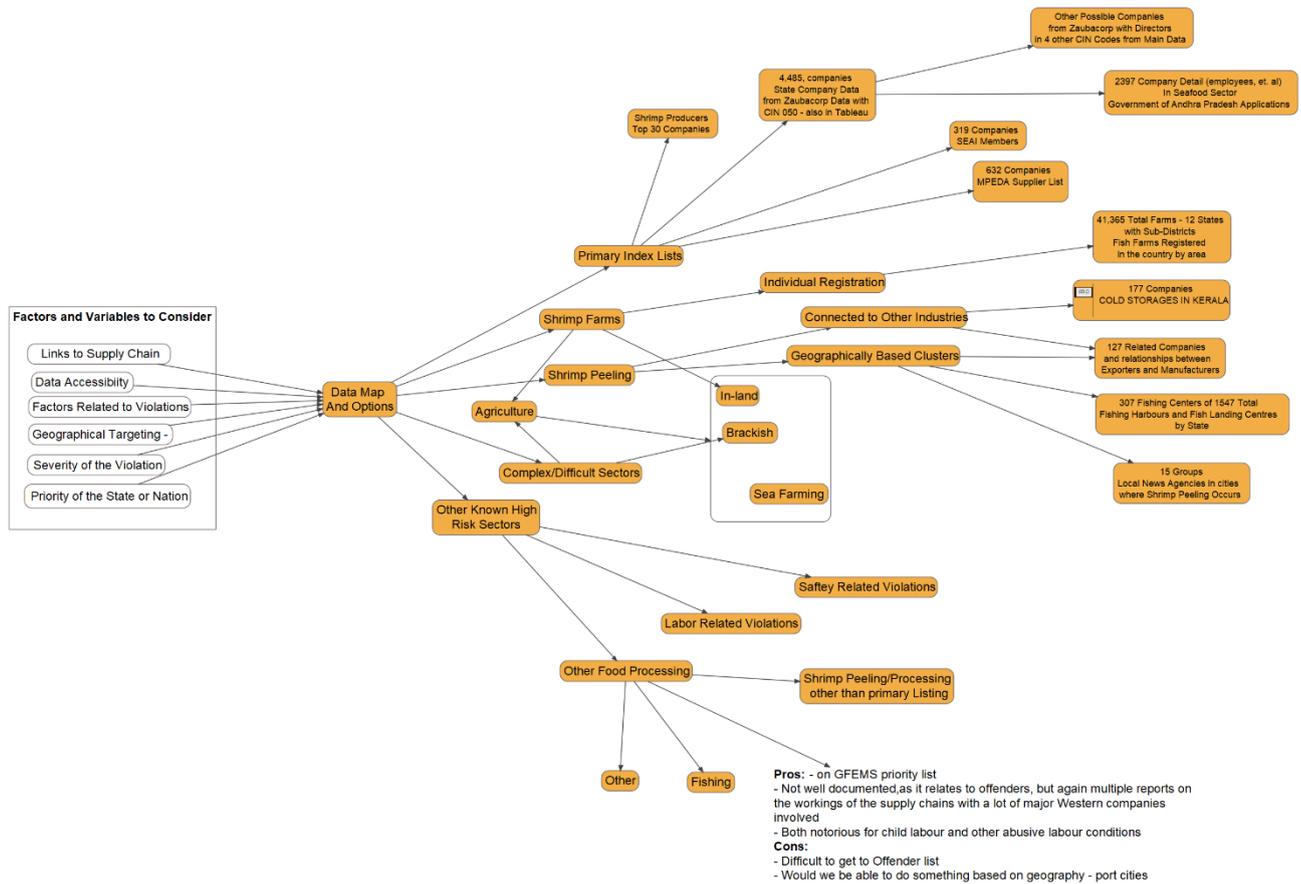
11. Report: Workshop on Enhancing capacities of women fishworkers in India for the implementation of the SSF Guidelines, Mariette Correa, International Collective in Support of Fishworkers March 2017
www.icsf.net

Logic Flow for List Acquisition Approach for the Shrimp Industry based on our Research of the sector and the limitations and challenges detailed in the above summary of the Sector in India.



1. We began by identifying the primary Industry code 050
 - a. Business detail and directors of CIN code 050 - [4,485 Records](#)
(Companies located in India and involved in fishing, operation of fish hatcheries and fish farms, service activities incidental to fishing)
 - i. Data for both U050 and L050 was pulled in 2022 from Zaubacorp Site which is scraped from the Government MCA data and structured and organized in more advantageous way. (4,485 Records)
<https://www.zaubacorp.com/company-list/nic-050/status-Active-company.html>
 - ii. Business detail on CIN Code L050 – same description as U050 but Public companies (28 Companies) This link is to the 2019 data scrape.
 - iii. [Link to Data](#)

Below are the key industry codes used by the MCA and the description of products that we believe may include the listings of companies that make up the broader shrimping industry. NIC code U050 or L050 is the primary code for the sector.



- We have the following additional index datasets for GFEMS as our first major deliverable, this data was also pulled from Zaubacorp Site:
 - Business detail and directors located in the Index Data Folder located [here](#):
 - CIN code U15 - 67,510
(Companies located in India and involved in manufacture of food products and beverages)
 - CIN code U99 - 40,417
(Companies located in India and involved in extra territorial organizations and bodies)
 - CIN code U51 - 178,390
(Companies located in India and involved in wholesale trade and commission trade, except of motor vehicles and motorcycles)
 - CIN Code U74 - 264,758
(Companies located in India and involved in other business activities)
 - We created an extract of these additional CIN codes with key words related to the Shrimp industry. Below is an example of the types of companies found.
 - A data set of 32,574 can be found [Here](#)
- We have found 30 top stakeholders in the shrimp industry in India
 - Data was pulled from the following [link](#)
 - [Link to data](#) with CIN codes

- List from the SEAI (Seafood Exporters Association of India) Membership list
 - Data was pulled from the following [Link](#)
 - [Data](#) of the 319 Members
- List from the MPEDA (Marine Products Export Development Authority) 632 companies
 - Data was pulled from the following [link](#)
 - [Data](#) of the 632 Companies
- List of Millionaires from Kerala – 227 Individuals
 - Data was pulled from the following [link](#)
 - [Data](#) of the 227 individuals

Shrimp farms were identified from the central registry above, but they do not necessarily represent all the companies that have shrimp farms. The total for this section is 41,365 records.

- Detail on the Coastal Aquaculture Authority who demand Shrimp Farms be registered in all 12 States/Union Territory or Coastal State (54 Subregions under the coastal States)
 - Data was pulled from the following [link](#)
 - Data of the 41,365 registrations is [here](#)
- Department of Industries – Andhra Pradesh Location. Details on company applications to the government– i.e., employee counts, request general Application Data (Government of Andhra Pradesh Applications (SHRIMP RELATED))
 - Data was pulled from the following [link](#)
 - [Sample data for 25 firms](#)
- We have the major Indian firms that import Shrimp into the US that were named in the [Anti-Dumping](#) case and the resolution of the accused from [2012](#)
 - Total of 207 companies – [data here](#)
- Major locations where Shrimp Farming and Peeling may occur, came from the following DOF 2020 government report. [Click here](#)
- We have the detailed list of coastal harbors and landing centers in India related to the industry - 307 of 1,547 List here
- We have the list of 127 exporters connected to manufacturers by region [Link Here](#)
- A list of Cold Storage Companies in Kerala from
 - [Link](#) to the location of the listings
 - Data of 177 companies – [link here](#)
- A listing of local news agencies where Shrimp Peeling may likely occur
 - Listing of the 15 media groups – we did searches on these to find potential reported violations [Link Here](#)

Possible Offenders based on Cited Cases in Court with Charges and links to the public documents.

1. We found that most of the Shrimp/seafood related companies that were involved with violations of some form were linked to cases that included the broad types listed here:
 - a. Anti-dumping
 - b. Business Dispute
 - c. Contaminated Food
 - d. Environmental
 - e. Financing
 - f. Fraud
 - g. Fraud: Corruption
 - h. Licensing
 - i. Labor Related
 - j. Tax
 - k. Violations of Coastal Regulations

[CLICK HERE FOR THE BASE DATA OF POTENTIAL VIOLATORS](#)

2. Apart from the above-mentioned categories, there are also companies in the following sectors:
 - a. Violations of Court Orders
 - b. We have drafted the list from the US FDA of both Red and Green lists [HERE](#)
 - c. Undefined – Proclaimed Offenders (see below)
3. **We also found some broader listings of companies that had been listed in default of their registrations with the government. Not necessarily a serious case, but possibly a factor that could be useful in your analysis. The director disqualification definitions are as follows:**

The Director are disqualified under section 164 (2) (a) of the Indian constitution which states: the disqualified in the lists are those who are, or were a director, in a company that has not filed financial statements or annual returns for any continuous period of three financial years. Such directors will not be eligible for re-appointment as a director in that company or for appointment in other companies for five years from the date of non-compliance for the file name List of disqualified directors.

- Here is a list of **44 Defaulting Companies in Kerala State**. This list has the CIN number and is categorized by the following sectors: Shrimp/Prawn (2), Fisheries/Fishing (25), Aqua Farm (14) Hatcheries (3). It is provided by the government.
(The file already in Dropbox-GFEMS/2021 Shrimp Processing Project/GFEMS 20 December 2021. [Link Here](#)
- Found a list of **66 Directors** that were disqualified in the fishing, shrimp industry with each director's unique DIN number and their related company CIN number. [Link Here](#)
- We have the list of what is called Proclaimed Offenders by the MCA: [\(source: Link\)](#)

A Proclaimed offender proceeding is an act of the court to affirm the person as the proclaimed offender. The court directs the concerned police officials to seize the person and produce him before the court. This is along with the publication in the newspaper of that person's name and other details.

This publication is done to officially declare him a Proclaimed Offender under the purview of the public. The meaning of being asserted as proclaimed Offender is that accused can be arrested by any citizen of India at any time or any place. The Passport of the proclaimed offender is also captured so that criminal doesn't go out of the country.

If at the time one has a proclaimed offender order, while that individual was doing any Government Job, then he will be detached and if not, he cannot apply for any government job at any level all the way through the life even if he is a proclaimed offender only for a single day.

THE FOLLOWING LISTS CAN BE STRUCTURED, BUT WE WILL FIND OUT IF THEY ARE USEFUL BEFORE DOING ANYTHING. WE WILL DO THIS AS A JOINT REVIEW.

1. In this first list, there are **86 companies** whose directors are declared Proclaimed Offenders by Court Order dating from 2009 to 2017. Out of this list, there are four companies with the word "Food", three with "Export", and four with "Agro" in the company name. <https://sapphire.envisageworldwide.com/reports/articles/cases-in-which-directors-of-the-company-declared-as-proclaimed-offender-by-the-honble-court-2/>
2. **22 Companies** with ROC Code 16 & ROC Code 53 who are offenders <https://sapphire.envisageworldwide.com/reports/articles/cases-in-which-directors-of-the-company-declared-as-proclaimed-offender-by-the-honble-district/>
3. **70 Directors of ROC-305** released by the MCA the directors who are banned as of 15 September 2021 <https://sapphire.envisageworldwide.com/reports/articles/list-of-70-disqualified-directors-as-of-september-2021/>
4. **3,435 Directors of ROC-Mumbai** who are banned by MCA as of 08 September 2020 <https://sapphire.envisageworldwide.com/reports/articles/3435-disqualification-of-directors-u-s-164-2-a-of-the-companies-act-2013-under-drive-iii-as/>
5. And these four directors will be banned until 2024 [Link to MCA](#)
6. This is the Disqualified Director list as of 15 September 2021 [Link to MCA](#)
Defaulting company means a company which has not filed its financial statements or annual return as required under the Companies Act, 1956 or Companies Act, 2013.

Other News Articles used for this Briefing

- <https://www.thehindu.com/news/national/andhra-pradesh/six-migrant-workers-killed-in-explosion/article35642299.ece>
- <https://www.thehindu.com/news/national/tamil-nadu/palk-bay-fishing-dispute-casting-the-net-in-a-sea-of-conflict/article33698525.ece>
- <https://timesofindia.indiatimes.com/city/bhubaneswar/7-held-for-gas-leak-in-prawn-processing-plant/articleshow/72061944.cms>
- <https://www.newindianexpress.com/states/tamil-nadu/2020/dec/19/shrimp-hatcheries-along-ecr-operating-without-crz-clearance-authorities-turn-blind-eye-rti-2238468.html>
- <https://apnews.com/article/business-india-nobel-prizes-b5a88e79d58a6ea4216309fd1be108d1>
- <https://www.thehindu.com/todays-paper/tp-national/ap-governor-steps-in-to-aid-migrant-workers/article34114039.ece>
- <https://www.seafoodsource.com/news/supply-trade/shrimp-insights-india-indonesia-and-vietnam-all-poised-for-continued-growth>
- <https://english.mathrubhumi.com/news/kerala/peeling-sector-in-crisis-due-to-shortage-of-prawns-1.3862150>
- <https://timesofindia.indiatimes.com/business/india-business/indias-seafood-exports-cross-7-billion/articleshow/64830505.cms>

Appendix A

Description:

See the Image file below and Zoom in to see clusters and names.

There is an excel file with the data located in Dropbox [HERE](#).

There is a PDF file with a network analysis also located in Dropbox [HERE](#).

This is a Network Analysis of Possible Violators in combinations with TOP Stakeholders in the Shrimp/Seafood Sector

(Green is a potential violator, Red is a Top Shrimp Sector Stakeholder)

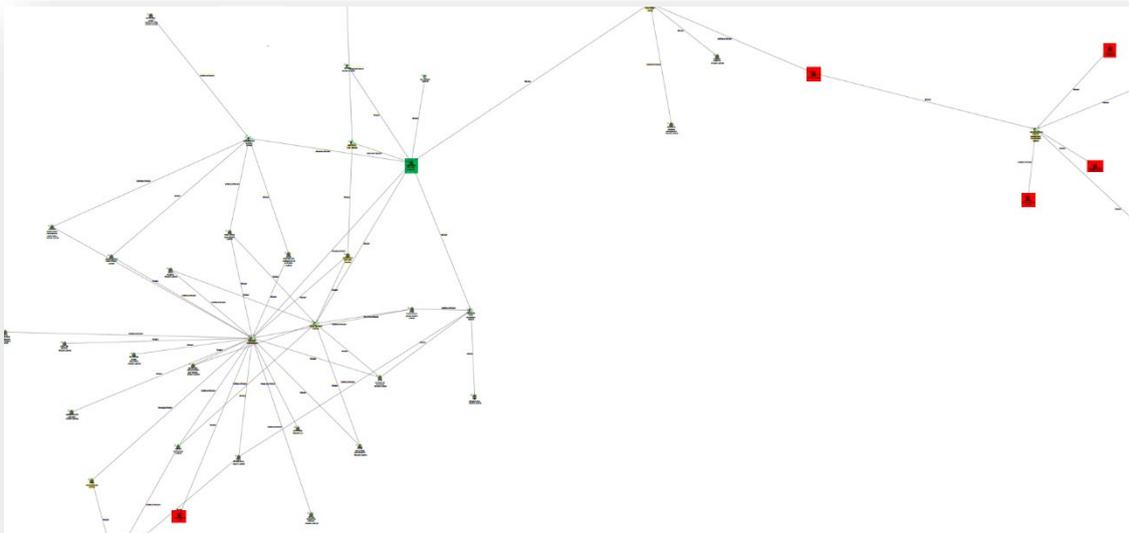
Every entity is matched with data in the spreadsheet of the potential violators.

We matched each entity between the seven spreadsheets named as follows:

1. Top stakeholder in shrimp industry as of August 2021,
2. The Top 5 Indian Shrimp Exporters 2021,
3. Suit from 2017 of Shrimp Packing companies overcharging,
4. US Case of 183 Shrimp Related Companies Anti-dumping,
5. List of disqualified directors,
6. LIST OF DEFAULTING COMPANIES IN KERALA,
7. Network Analysis on 54 Companies in sapphire

The reason we matched with all these files was because we did not want to miss any companies from the pdf cluster and all these above files were submitted to GFEMS above.

In the excel file, you will see that in column C lists where we extracted the companies name from. Not all files were profiled in Sapphire.



In this excerpt from the map, we see the possible violator linked two ways to key stakeholders through various connections. Other network analysis views show different types of links.