

# ETC | Buyer Responsibilities + Data (June 2026)

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## Introduction

ETC is a market-based multistakeholder initiative. In a market-based initiative, buyers have an essential role to play in conveying expectations to their upstream suppliers and incentivizing and rewarding progress toward meeting those expectations.

In tuna supply chains, there are “buyers” at many levels. End buyers (retailers, restaurant chains, institutional food service companies, hospitality companies) and brands (canned tuna, pet food) buy from mid-chain buyers (wholesalers, distributors, importers, processors, brokers, traders), who in turn buy from vessel owners.

When we use the general term **buyer** in this document, we’re referring to any company along the supply chain that purchases tuna from an upstream supplier:

- For end buyers, their upstream suppliers could include brands, distributors, importers, or processors.
- For brands or mid-chain buyers, their upstream suppliers could include processors, traders, or vessel owners.

Consequently, brands and mid-chain buyers are both buyers and suppliers of tuna. When we use the general term **supplier** in this document, we’re referring to the upstream supplier(s) a buyer purchases tuna from.

This document outlines proposed responsibilities for buyers at any point along the supply chain that choose to participate in ETC, including data buyers will provide via an annual progress report to ETC. They support ETC’s objective of engaging a critical mass of participating buyers to send a clear market signal about expectations through the supply chain to vessel owners and incentivize and reward vessel-level improvement.

## **Core principles**

The proposed responsibilities reflect the following core principles:

1. All buyers – including end buyers, brands, mid-chain buyers, and traders – are responsible for preventing and mitigating labor abuses that occur at all levels of their supply chains, including on vessels they source from. Active participation in ETC helps buyers demonstrate that they are meeting this responsibility in their tuna supply chains.
2. Fundamental to ETC is the principle of continuing to engage with vessel owners that are not yet demonstrating best practice and providing support (including market signal, capacity building, and financial support) so that they can make changes that improve fisher outcomes. Buyers have an essential role to play in incentivizing and rewarding improvement over time.
3. Buyers’ purchasing practices (including contracting and supplier management) can create instability for other actors in the supply chain,

impacting their ability to prevent and mitigate forced labor. By opening a dialogue with their suppliers about the impact of purchasing practices and ultimately making improvements where needed, buyers can help to address a root cause of forced labor on tuna vessels.

4. Mapping tuna supply chains to the vessel level is an important step in human rights due diligence. Public disclosure of vessel lists is a best practice that enables recognition of responsible actors and collaborative action to address shared risks in consolidated supply chains.

## **Buyer Responsibilities**

These responsibilities apply to **any ETC-participating company along the supply chain that purchases tuna from an upstream supplier**, including end buyers, brands, distributors, importers, processors, and traders.

### **1. Convey expectations to relevant suppliers and track their progress in meeting expectations.**

Buyers commit to use their most effective mechanisms to convey expectations to their suppliers. Depending on the buyer, examples include (but are not limited to):

- Ask suppliers to participate in ETC.
- Ask suppliers to engage in pilot projects addressing ETC's priority issues.
- Include expectations in written supplier requirements.
- Include expectations in bid specifications.
- Include expectations in relevant agreements (such as contracts, purchasing agreements).
- Include expectations in relevant worker-driven social responsibility programs in which the buyer is a participant.

As described in the reporting table at the end of this document, participating buyers must report that they use at least one mechanism with evidence.

Buyers commit to track supplier progress in meeting their expectations related to ETC:

- Track which suppliers participate in ETC.
- Use ETC-provided information on relevant suppliers' progress to help inform individual responsible sourcing strategies and decisions.
- Report to ETC the percentage of their total tuna volume that comes from vessels that 1) participate in ETC; 2) are improving toward ETC priorities; and 3) have achieved ETC priorities.

### **Rationale:**

- Currently, suppliers and vessel owners receive disparate messages from buyers about expectations for progress on ETC's four priorities (timely payment of wages per contract terms, employer-paid recruitment fees, fisher access to Wi-Fi at sea, fisher access to grievance mechanisms). To address this challenge, it is essential for buyers participating in ETC to clearly convey

expectations for improvement on these priorities through each level of the supply chain so that suppliers and eventually vessel owners receive a strong, aligned market signal.

- Buyers have flexibility to determine their most effective mechanisms for engaging with their suppliers to fulfill this responsibility. Annual progress reports on the mechanisms buyers are using and the proportion of tuna volume from vessels engaged in ETC will provide data to understand which mechanisms are most impactful and track progress over time.

## **2. Obtain vessel lists from suppliers.**

Buyers commit to obtain vessel lists from their suppliers. Buyers are encouraged to disclose vessel lists confidentially to ETC and/or publicly, but disclosure is not a requirement of participation initially.

### **Rationale:**

- ETC's core principle that buyers are responsible for preventing and mitigating labor abuses that occur at all levels of their supply chains requires buyers to know the vessels they are sourcing from.
- Vessel list transparency is not yet the norm in the seafood sector, and requiring vessel list disclosure would impact ETC's ability to engage a critical mass of buyers at this time. Instead, ETC can encourage and celebrate disclosure as a best practice and work toward phasing in disclosure as a requirement over time.

## **3. Provide an annual progress report to ETC.**

Buyers commit to provide an annual progress report to ETC on how they are engaging their suppliers and how they are working toward embedding ETC's core principles around responsible purchasing practices and vessel list transparency in their operations.

### **Rationale:**

- Requiring buyers to provide an annual progress report (with evidence) on how they are fulfilling their core participation responsibilities allows ETC to track improvement over time and, if needed, address non-participation.
- In addition, requiring buyers to describe how they are working toward embedding ETC core principles in their operations signals the importance of these principles and encourages improvement over time.

### **Note:**

*ETC's fall stakeholder feedback period will include a proposal on what information ETC will share publicly. As you review the progress report details below, assume the information will be reported confidentially to ETC and shared publicly in anonymous/aggregated form only.*

<b>Annual Progress Report</b>	
<b>Convey expectations to relevant suppliers.</b> <i>Buyers report on all indicators and must answer yes for at least one indicator with appropriate evidence.</i>	
<b>Indicator</b>	<b>Evidence</b>
<ul style="list-style-type: none"> <li>• Yes/No Ask suppliers to participate in ETC</li> </ul>	Description of how ask was conveyed to suppliers
<ul style="list-style-type: none"> <li>• Yes/No Ask suppliers to engage in pilot project(s) addressing ETC priority issues</li> </ul>	Description of how ask was conveyed to suppliers, including the pilot project name(s)
<ul style="list-style-type: none"> <li>• Yes/No Include expectations in written supplier requirements</li> </ul>	Link to or PDF of written supplier requirements (examples include but are not limited to supplier code of conduct, supplier qualification requirements)
<ul style="list-style-type: none"> <li>• Yes/No Include expectations in bid specifications</li> </ul>	PDF of example bid specification with confidential information removed
<ul style="list-style-type: none"> <li>• Yes/No Include expectations in relevant enforceable agreements</li> </ul>	PDF of enforceable agreement (examples include but are not limited to contracts, purchasing agreements) with confidential information removed
<ul style="list-style-type: none"> <li>• Yes/No Include expectations in relevant worker-driven social responsibility programs</li> </ul>	PDF of relevant document demonstrating how expectations are included
<ul style="list-style-type: none"> <li>• Other (describe)</li> </ul>	Relevant documentation and/or description
<b>Track progress in meeting expectations.</b>	
<ul style="list-style-type: none"> <li>• Yes/No Track which suppliers participate in ETC</li> </ul>	List of participating suppliers  <i>For example:            -an end buyer would submit the names of its immediate suppliers that participate in ETC such as brands, distributors, and/or importers</i>

	<p>-a brand would submit the names of its immediate suppliers such as processors and/or traders</p> <p>-a trader would submit the names of its immediate suppliers such as vessel owners</p>
<ul style="list-style-type: none"> <li>• % of total tuna volume that comes from vessels that 1) participate in ETC; 2) are improving toward ETC priorities; and 3) have achieved ETC priorities</li> </ul>	<p>Complete ETC-provided percentage calculation template</p>
<p><b>Obtain vessel lists from suppliers.</b></p>	
<ul style="list-style-type: none"> <li>• Yes/No Vessel lists obtained from all tuna suppliers annually</li> </ul>	<p>Buyers are encouraged to confidentially share their vessel lists with ETC, but it is not required</p>
<p><b>ETC Core Principles</b></p> <p><i>The items below are recognized best practices for the prevention of forced labor, but are not yet the norm in tuna supply chains. ETC has an objective to encourage participating buyers to learn about and adopt these best practices over time.</i></p>	
<p><b>Responsible Purchasing Practices</b></p> <p>Describe how your company is working toward best practices for responsible purchasing. Examples of best practice include:</p> <ul style="list-style-type: none"> <li>• Engaging in joint human rights due diligence and planning processes with upstream suppliers;</li> <li>• Discussing with suppliers the level of support that may be needed to implement human rights due diligence obligations;</li> <li>• Committing to upfront and timely communication about contract terms that may impact labor and human rights (such as payment terms);</li> <li>• Transparent and timely notification and collaborative problem solving around changes to contract terms (such as adjustments to order volumes);</li> <li>• Committing to support remediation when problems arise; and</li> <li>• Supporting responsible exit when remediation isn't possible.</li> </ul> <p><i>For more information see:</i></p> <ul style="list-style-type: none"> <li>• <i>Ethical Trading Initiative's Responsible Purchasing Practices <a href="#">resource hub</a></i></li> <li>• <i>Oxfam's Briefing Paper <a href="#">Emerging Good Practices on Embedding Human Rights into Seafood Procurement</a></i></li> <li>• <i><a href="#">Responsible Contracting Project</a></i></li> <li>• <i>UN Global Compact's <a href="#">Toolkit</a></i></li> </ul>	
<p><b>Vessel List Transparency</b></p>	

Yes/No Have you publicly disclosed your vessel list for tuna?  
If Yes, link to location where vessel list is public.