

# Interim Performance Evaluation

*Fostering Accountability in Recruitment for Fishery Workers (FAIR Fish) Project*



## United States Department of Labor

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## **SUBMITTED TO**

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Interim Performance Evaluation of *Fostering Accountability in Recruitment for Fishery Workers* (FAIR Fish) Project  
Final Draft Report

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This report presents the findings of the interim evaluation of the *Fostering Accountability in Recruitment for Fishery Workers* (FAIR Fish) Project. IMPAQ International, LLC (IMPAQ) conducted remote fieldwork for this independent evaluation from February 15 to March 31, 2021 in collaboration with the project team and stakeholders and prepared the evaluation report according to the terms specified in our contract with the United States Department of Labor. IMPAQ wants to express sincere thanks to all the parties involved for their support and valuable contributions.

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## List of Acronyms

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BEO	Business Engagement Officer
BSCI	Business Social Compliance Initiative
CBA	Cost Benefit Analysis
CMEP	Comprehensive Monitoring and Evaluation Plan
COVID-19	Coronavirus Disease 2019
DAC	Development Assistance Committee
DOE	Department of Employment
EOP	End of Project
FGD	Focus Group Discussion
FL	Forced Labor
FWAO	Foreign Workers Administration Office
GLP	Good Labor Practices
GOR	Grant Officer Representative
HT	Human Trafficking
ILAB	USDOL International Labor Affairs Bureau
ILO	International Labor Organization
IEC	Information, education, and communication
IOM	International Organization of Migration
ISO	International Organization for Standardization
KII	Key Informant Interview
M&E	Monitoring and Evaluation
MERL	Monitoring, Evaluation, Research, and Learning
MOL	Ministry of Labor
MOU	Memorandum of Understanding
MWIS	Management of Migrant Workers Import and Service Trade Association
NGO	Non-Governmental Organization
OCFT	ILAB's Office of Child Labor, Forced Labor, and Trafficking
OECD	Organization for Economic Cooperation and Development
OTP	Output Indicator
OTC	Outcome Indicator
OTLA	ILAB's Office of Trade and Labor Affairs
NGO	Non-governmental Organization
PO	Project Objective
PPE	Personal Protective Equipment
RDQA	Routine Data Quality Assessment
RF	Results Framework
RRM	Responsible Recruiting Model
SEAS	Stopping Exploitation through Accessible Services Project
SME	Small and Medium-Sized Enterprise

TFS	The Food School
TIP	Trafficking in Persons Report
TOC	Theory of Change
TOR	Terms of Reference
TOT	Training of Trainers
TPR	Technical Progress Report
TTIA	Thai Tuna Industry Association
TVPA	Trafficking Victims Protection Act 2000
UN	United Nations
US	United States
USD	United States Dollar
USAID	United States Agency for International Development
USDOL	United States Department of Labor

## Executive Summary

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On November 30, 2018, the United States Department of Labor's (USDOL) Bureau of International Labor Affairs' (ILAB) Office of Child Labor, Forced Labor, and Trafficking (OCFT) awarded Plan International USA a cooperative agreement grant for USD 4 million to implement the Fostering Accountability in Recruitment for Fishery Workers (FAIR Fish) project. The period of performance is January 1, 2019 to December 31, 2022.

The overall project objective is to reduce forced labor and human trafficking in the recruitment of women and men in the seafood processing sector in Thailand. To support the project's objective, the project design includes four outcomes: 1) improved understanding of the nature of forced labor and human trafficking in the recruitment of workers; 2) improved company-led approaches to address forced labor and human trafficking in the recruitment process; 3) improved compliance with recruitment policies and procedures by third-party recruiters; and 4) increased action on promoting responsible recruitment policies and practices among private sector actors.

### Evaluation Purpose

This evaluation provides an assessment for USDOL, Plan International USA, and other key stakeholders of the project's performance, its effects on project participants, and an understanding of the factors driving the project results. The evaluation is also meant to inform USDOL, Plan, and stakeholders of the design and implementation of subsequent phases or future projects focused on responsible recruiting practices for migrant workers.

### Methodology

The evaluation team used a mixed-method approach to conduct the interim evaluation, including the review of key documents, interviews with 32 key informants, an analysis of budget allocations and expenditures, and an analysis of indicator target achievements. To protect the evaluation team, project staff, and other key stakeholders from Coronavirus Disease 2019 (COVID-19) infection, USDOL decided that data collection during the fieldwork phase would consist of conducting all interviews remotely using platforms such as Zoom, LINE, and Microsoft Meetings.<sup>1</sup>

### Main Findings and Conclusions

#### *Relevance*

**The project's design and theory of change remain relevant and appropriate to combat forced labor and human trafficking.** However, after two years of implementation, several factors have surfaced that threaten the project design logic. The two pilot companies employ few migrant workers. One pilot company does not employ migrant workers while in the other pilot company, 52 migrant workers account for 25 percent of the total workforce. The pilot recruiting agencies do not have a relationship with the seafood processors as envisioned in the project design and do not consistently recruit migrant workers for the seafood sector. Furthermore, the project does not have

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<sup>1</sup> <https://www.cdc.gov/coronavirus/2019-ncov/about/index.html> and <https://www.who.int/emergencies/diseases/novel-coronavirus-2019>

strategies in place to solicit the support of key national and international actors that could help the project promote responsible recruiting practices.

Overall, the project's strategies are relevant to the needs of key stakeholders in the seafood processing sector. While the strategies remain relevant, there has been a consolidation in the seafood processing sectors where many smaller companies have gone out of business and others are struggling to stay in business. The consolidation begs the question as to whether the project should broaden its targets to include larger seafood processing companies that specifically export to international markets and whose migrant workers are at risk for labor rights violations. Given the difficulty of working with small seafood processing companies as documented in the evaluation report, broadening the target to include larger companies will help ensure the project meets the overall project objective.

### *Effectiveness*

While the project has made progress in achieving certain key outcomes and outputs, it has made less progress achieving others due primarily to delays caused largely by the COVID-19 pandemic and the completion of several key deliverables. The project has fully completed activities under Outcome 2 including developing the responsible recruiting model (RRM) and responsible recruiting policies and procedures for the two pilot companies. The project has nearly completed activities under Outcome 3 including developing responsible recruiting policies and procedures and internal monitoring systems for the pilot recruiting agencies. The one output under Outcome 3 not achieved yet is online training for recruiters in Thailand, Myanmar, and Cambodia.

The progress on Outcome 1 is limited because the communication strategy has been delayed. Outcome 4 activities and outputs depend largely on the outputs produced under Outcomes 2 and 3 (i.e. RRM and responsible recruiting policies and procedures) that, according to the April 2021 TPR, will be reported in 2022. The exceptions are the cost benefit analysis (CBA) model under Output 4.1 that was completed in March 2021 and the procurement and distribution of personal protective equipment (PPE) and information, education, and communication (IEC) materials under Output 4.4. It should be noted that the procurement and distribution of PPE and IEC materials to protect workers and their families against COVID-19 infection has been delayed nearly one year due to a complicated and prolonged IEC materials development and approval process.

Border closing facilitated and hindered project implementation. Border closures to mitigate the spread of COVID-19 halted the recruitment of migrant workers that allowed recruiting agencies to participate in the project at a level that they may not have been possible if they were fully engaged in recruitment. However, the border closings meant that the pilot companies and recruiting agencies could not recruit migrant workers and fully implement and test the responsible recruiting model. The border closings have also hindered the ability to conduct cost-benefit analysis for the business case.

The project's decision to invite two seafood processing companies that Plan Thailand worked with in a previous project facilitated project implementation because Plan had developed a trusting relationship with the companies, allowing the project to begin implementation quickly. On the other hand, one company does not employ migrant workers and the other only employs 52 with plans to recruit only 8 to 10 more migrant workers, making it difficult to test the responsible recruiting model and implement all of the policies and procedures. While the project finally

identified four recruiting agencies to participate, these agencies do not have a relationship with the pilot companies, as envisioned in the project design, and do not specifically recruit migrant workers for the seafood processing sector.

While overall the project's interventions are effective, there are a few exceptions:

- The attendance of the quarterly information sharing and learning meetings is low and inconsistent.
- The pilot companies and recruiting agencies do not intend to implement parts of the responsible recruitment model (RRM) that they perceive to be either not relevant or not feasible.
- The social compliance monitoring systems are difficult for recruiting agencies to implement given their lack of experience with social management systems and financial and human resource constraints
- The project does not have engagement strategies for key stakeholders (other than the government) that could help it promote responsible recruiting practices.

The project's management systems are effective. Initially, the project underestimated the level of staffing required to provide financial and grant reporting, which was an important weakness. The project adjusted its management structure to include a finance officer and a grants administration officer, and also incorporated a communications officer to oversee the communication strategy. In addition, the project's supervisory and reporting systems are adequate to manage the project and considered a strength. The comprehensive monitoring and evaluation plan (CMEP) is effectively used to monitor the achievement of key indicators and to make decisions regarding implementation. For example, the project revised three key indicators to more accurately measure achievements. However, the CMEP will require updating if the project decides to modify indicators based on the recommendations (Recommendation #1 below).

The project has taken several important steps to mainstream gender into the project. For example, Plan International USA sent a gender specialist to Thailand to orient project staff and sub-contractors on gender mainstreaming. The project incorporated gender issues in the responsible recruiting model and policies and procedures and provided technical assistance and coaching on how to incorporate gender. Additionally, the project's communication activities include gender sensitive messages.

### *Efficiency*

The project's financial and human resources appear to be adequately allocated to achieve the outputs. However, the project is underspent by 21 percent while the specific outcome line items are underspent by about 90 percent. While the project has a plan to accelerate spending, it appears unlikely that all funds in the grant award will be expended by the time the project end date.

Other factors hindering efficiency included delays in developing and disseminating important products such as the key practices report, the Responsible Recruiting Model (RRM), the responsible recruiting app, the communication strategy, and the COVID-19 PPE and IEC materials.

### *Sustainability*

Although the project has a brief, three-page sustainability strategy, it does not rise to the level of a detailed sustainability plan. A detailed sustainability plan should describe what will be sustained, actions the project should take to sustain them, required resources and capacities, timeframes and benchmarks, and who is responsible.

Small and medium sized seafood processing companies and recruiting agencies have limited resources to invest in responsible recruiting practices and need to see a compelling business case to do so. Furthermore, they need a simple and practical process to implement responsible recruiting practices. Finally, the project needs to enlist the support of the government and other key actors such as seafood processing associations, other business associations, and international organizations to promote responsible recruiting and eventually convince seafood processing companies and recruiting agencies to implement these practices.

## **Lessons Learned and Good Practices**

*The evaluation team found the following key lessons learned from the FAIR Fish project:*

- To have the intended impact on forced labor and human trafficking in the seafood processing sector, it is important to work with seafood processing companies that employ significant numbers of migrant workers and with recruiting agencies that recruit migrant workers for companies in the seafood processing sector.
- The willingness of the pilot companies and recruiting agencies to commit to and participate in project activities is critical and depends largely on perceived benefits of participation.
- Small and medium sized enterprises (SMEs) in the seafood processing sector require a simple and easy-to-implement roadmap, including a compelling business reason to implement responsible recruiting practices.
- In an emergency, such as COVID-19, projects require streamlined procurement processes to distribute emergency supplies to beneficiaries in the most rapid way possible to save lives.
- Drafting key documents such as the policies and procedures in Thai facilitates the ability of the pilot companies and recruiting agencies to review and provide comments.
- For projects that have a strong communication component, having a dedicated communication specialist to oversee and guide the communication strategy and activities is essential.

*The following are key good practices:*

- In response to the COVID-19 prevention and mitigation measures, the project shifted face-to-face encounters, such as trainings and meetings, to online formats using primarily Zoom and LINE and their technology features to increase effectiveness.
- The project employed a constructive engagement approach with the pilot companies and recruiting agencies that has helped build trust and facilitate development of recruiting solutions based on international standards.
- The project requested that its business engagement officers (BEO) observe the technical assistance sessions that The Food School (TFS) provided to the pilot companies and recruitment agencies to increase the BEOs capacity to support the pilot companies and recruiting agencies once the TFS contract ended.

## Recommendations

### *Recommendations for the Project's Consideration*

1. Revise the indicator for the project objective to anticipate the effect that achieving Outcome 4 (seafood processing companies and recruiting agencies act on responsible recruiting) will have on human trafficking and forced labor in the seafood processing sector. The project should also revise the indicator for Outcome 1 so it more accurately measures increased understanding of its full target audience (migrant workers, companies, recruiters, government, trade associations, non-governmental organizations).
2. Consider simplifying the RRM so it is more user friendly and feasible to implement for seafood processing companies with limited human and financial resources.
3. Consider broadening the primary target to include larger seafood processing companies (not just SMEs) that export product to international markets and that may not be following responsible recruiting practices.
4. Develop a detailed strategy to promote the RRM and convince as many seafood processing companies and recruiting agencies as possible to implement the model's critical elements.
5. Develop a detailed sustainability plan that provides a clear roadmap to the sustainability of key outputs and outcomes during the project's remaining life.
6. Consider developing and piloting the recruiter online training course in the native languages of the target audience in Thailand, Myanmar, Cambodia so they can fully participate, learn, and provide critical comments to improve the course.
7. Provide key documents and IEC materials in Thai or the primary language of the migrant workers the project intends to reach.

### *Recommendations for Plan International USA's Consideration*

8. Should work with the project to identify and contract an expert consultant to provide technical support to project staff to revise the RRM.
9. Should ensure that future contracts and scopes of work clearly define the objectives, products or deliverables, and processes required of the contractors to avoid confusion.
10. Should consider developing emergency response guidelines for emergency situations such as COVID-19 that require rapid responses to distribute lifesaving supplies to those in need.

### *Recommendations for USDOL's Consideration*

11. Should request that the project develops budget expenditure projections based on COVID-19 assumptions aimed at helping USDOL and Plan to determine the amount of funds that will be unspent by December 31, 2022.
12. If the expenditure projections (Recommendation #11) suggest that the project will be underspent, USDOL should consider providing a no-cost extension to allow the project time to concentrate its efforts on Outcome 4, promoting responsible recruiting policies and practices and to implement the detailed sustainability plan (Recommendation #5).

## Introduction

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The mission of the Office of Child Labor, Forced Labor, and Human Trafficking (OCFT) within the Bureau of International Labor Affairs (ILAB), an agency of the U.S. Department of Labor (USDOL) is to promote a fair global playing field for workers in the United States and around the world by enforcing trade commitments, strengthening labor standards, and combating international child labor, forced labor, and human trafficking.

OCFT works to combat child labor, forced labor, and human trafficking around the world through international research, policy engagement, technical cooperation, and awareness raising. Since OCFT's technical cooperation program began in 1995, the U.S. Congress has appropriated funds annually to USDOL for efforts to combat exploitive child labor internationally. This funding has supported technical cooperation projects in more than 90 countries around the world. Technical cooperation projects funded by USDOL support sustained efforts that address child labor and forced labor's underlying causes, including poverty and lack of access to education.

USDOL, through ILAB, contracted with IMPAQ International, LLC (IMPAQ) to conduct an interim performance evaluation of the *Fostering Accountability in Recruitment for Fishery Workers* (FAIR Fish) Project. The evaluation provides USDOL and its grantees a fact-based and independent assessment of the project's performance, ensuring an in-depth analysis to explain the rationale for conclusions regarding progress against established targets. The evaluation also presents an analysis of the recognized gaps between expected and actual performance and strives to identify source(s) of these gaps, looking at aspects such as relevance of the design, project management, changes in operating environment, changes in context, success factors, and achievement of intended results and goals. The evaluation team conducted a mixed-methods study to assess the project's effects and the likely sustainability of results. In parallel, the evaluation identified relevant lessons learned with a view to strengthen the project's remaining period of performance and inform future programming.

This interim evaluation report is structured as follows: Section 1 outlines the FAIR Fish project and the Theory of Change (TOC) it follows. Section 2 describes the evaluation objectives and methodology, including its approach to data collection and any limitations and challenges the evaluation team encountered when collecting and analyzing data, along with how they were mitigated. Section 3 details the findings of the evaluation, in the order of each of the 12 evaluation questions (EQs). Section 4 provides lessons learned and best practices identified by the evaluation team. Finally, Section 5 provides conclusions and recommendations based on evaluation findings.

# 1. Project Context and Description

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## 1.1. Project Context

The Thai seafood sector employs more than 600,000 workers and depends heavily on migrant workers.<sup>2</sup> The International Labor Organization (ILO) estimates that more than 70 percent of workers in the sector are migrants from Myanmar and Cambodia.<sup>3</sup> According to the International Organization of Migration (IOM), forced labor and human trafficking are extensive in the seafood sector.<sup>4</sup> Research conducted by the Issara Institute found that 76 percent of Thai and Cambodian fishers were subjected to debt bondage, paid illegally low wages, and worked longer hours than permitted by Thai labor law. The study also found that 40 percent had been trafficked in the last 5 years.<sup>5</sup>

Many companies in the seafood sector rely on recruitment agencies or individual recruiters to source their workforce from Cambodia and Myanmar.<sup>6</sup> It is common for recruiting agencies to require recruited workers to pay for their transportation and pre-departure training fees. In some cases, recruiters require a bond fee that must be forfeited if the workers do not complete their labor contracts. Some recruitment agencies hold recruited workers until jobs are available charging them for food and lodging. These fees, which place an economic burden on workers, can amount to as much as 62 percent of a worker's future wages.<sup>7</sup>

Due to poor working conditions, the seafood sector is considered undesirable by Thai nationals and migrant workers. To attract workers, some recruiters resort to deception by promising employment in the construction or agricultural industries, which are considered preferable to the seafood sector. However, once migrant workers arrive to Thailand, they can find themselves forced to work in the seafood sector to repay their accrued recruitment-related debt.<sup>8, 9, 10, 11</sup>

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<sup>2</sup> The seafood sector includes fishing and seafood processing.

<sup>3</sup> ILO, *Ship to Shore Rights: Baseline research findings on fishers and seafood workers in Thailand*, ILO, 2018, Verite, *Strengthening Protections Against Trafficking in Persons in Federal and Corporate Supply Chains*, 2015.

<sup>4</sup> IOM, *Report on Human Trafficking, Forced Labour and Fisheries Crime in the Indonesian Fishing Industry*, 2016, pp.32-34.

<sup>5</sup> Flaim, Amanda, Subrmaniam, G. & Rende Taylor, LM, *Eliminating Human Trafficking from the Fishing Industry: Perspectives of Thai commercial fishing vessel owners*. Bangkok: Issara Institute, January 2018.

<sup>6</sup> *The Mekong Challenge: Underpaid, Overworked, and Overlooked – The realities of young migrant workers in Thailand (Volume 1)*, 2006, p.69.

<sup>7</sup> Marshall, Phil, *Slavery Free Recruitment Systems: A Landscape Analysis of Fee-Free Recruitment Initiatives*, Issara Institute, September 2016.

<sup>8</sup> IOM, *Trafficking of Fishermen in Thailand*, January 2011. p.19.

<sup>9</sup> *Ibid.*

<sup>10</sup> IOM, *Trafficking of Fishermen in Thailand*, 2011; Issara Institute and International Justice Mission, *Not in the Same Boat: Prevalence & Patterns of Labour Abuse Across Thailand's Diverse Fishing Industry*, January, 2017.

<sup>11</sup> ILO, *Ship to Shore Rights: Baseline research findings on fishers and seafood workers in Thailand*, ILO, 2018.

Other dishonest recruitment practices include contract substitution, unauthorized or non-transparent salary deductions, and inflated charges for services.<sup>12</sup> In addition, some recruiters do not provide a written copy of contracts in the workers' native language while others withhold wages or forcibly prevent workers from leaving employment after arriving in country.<sup>13</sup>

Thailand is considered a source, destination, and transit country for forced labor and human trafficking, including in the seafood sector.<sup>14</sup> In 2014 and 2015, the US State Department placed Thailand on its Tier 3 List of Trafficking in Persons (TIP) Report because the country did not make significant efforts to comply with the Trafficking Victims Protection Act 2000 (TVPA) minimum standards.<sup>15,16</sup> In the 2016 and 2017 TIP reports, Thailand was upgraded to the Tier 2 Watch List for making efforts to address human trafficking.<sup>17</sup> In 2018, the US State Department moved Thailand to Tier 2 for its continued efforts to address human trafficking. Thailand has remained at the Tier 2 level in the 2019 and 2020 TIP reports.<sup>18</sup> In part, Thailand was upgraded to Tier 2 due to its efforts to enact new laws and regulations to control human trafficking in the fishing supply chain.<sup>19</sup>

Nevertheless, the Seafood Working Group issued a report in July, 2020 stating that the US decision to move Thailand to Tier 2 was made “despite detailed and comprehensive evidence demonstrating weaknesses of the Thai government’s efforts in the areas of prosecution, protection, and prevention of human trafficking in 2019.”<sup>20</sup> The group recommends that Thailand be downgraded to the Tier 2 Watch List because it has not satisfied the minimum requirements of the TVPA and has failed to make considerable progress to combat trafficking in persons last year.

## **1.2. Project Description**

On November 30, 2018, the United States Department of Labor’s (USDOL) Bureau of International Labor Affairs’ (ILAB) Office of Child Labor, Forced Labor, and Trafficking (OCFT) awarded Plan International USA a cooperative agreement for USD 4 million to implement the

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<sup>12</sup> Marshall, Phil, Slavery Free Recruitment Systems: A Landscape Analysis of Fee-Free Recruitment Initiatives, Issara Institute, September 2016.

<sup>13</sup> UNODC, The Role of Recruitment Fees and Abusive and Fraudulent Practices of Recruitment Agencies in Trafficking in Persons, June 2015.

<sup>14</sup> <https://www.responsiblesourcingtool.org/visualizerisk>

<sup>15</sup> Department of State, Trafficking in Persons Report, 2016, 2017.

<sup>16</sup> The Trafficking in Persons Report is an annual report issued by the U.S. State Department's Office to Monitor and Combat Trafficking in Persons. It ranks governments based on their perceived efforts to acknowledge and combat human trafficking according to three tiers: Tier 1 countries fully comply with the TVPA's minimum standards; Tier 2 countries do not fully comply with TVPA's minimum standards but are making significant efforts to comply; Tier 3 countries do not fully comply with the minimum standards and are not making significant efforts to comply.

<sup>17</sup> Department of State, Trafficking in Persons Report, 2018. Tier 2 Watchlist countries do not fully comply with minimum standards but are making significant efforts to comply and (1) human trafficking is significant and the country is not taking concrete actions or (2) there is a failure to provide evidence of increasing efforts to combat human trafficking from previous year: <https://www.state.gov/report-to-congress-on-2021-trafficking-in-persons-interim-assessment-pursuant-to-the-trafficking-victims-protection-act/>

<sup>18</sup> Department of State, Trafficking in Persons Report, 2019, 2020.

<sup>19</sup> Thai Royal Ordinance on Importation of Aliens to Work with Employers (B.E.2559) (2016).

<sup>20</sup> The Seafood Working Group is a global coalition of labor, human rights, and environmental non-governmental organizations: <https://laborrights.org/thai-seafood-working-group> , [https://www.hrw.org/sites/default/files/media\\_2020/07/200730%20SWG%20TIP%20Statement.pdf](https://www.hrw.org/sites/default/files/media_2020/07/200730%20SWG%20TIP%20Statement.pdf)

Fostering Accountability in Recruitment for Fishery Workers (FAIR Fish) project. The period of performance is January 1, 2019 to December 31, 2022.

The original project design targeted seafood processing small and medium enterprises (SMEs) and suppliers such as small fishing companies and operators. However, during consultations with the project’s pilot seafood processing companies, the companies expressed concern that they could not convince their suppliers to participate in the project interventions. Based on these concerns, the project decided to narrow the target to seafood processors and their recruiting supply chains.

The FAIR Fish project focuses on responsible recruitment practices as a solution to combat human trafficking and forced labor in the recruitment process. The project advocates for SME seafood processors to establish responsible recruitment practices in their supply chains. While international seafood companies are becoming more aware of the need to overhaul their recruitment processes to protect brand reputation and their workforces, the benefits and necessity of establishing responsible recruitment practices are not well understood nor easily achieved for SMEs and their supply chains.

The overall aim of the project is to protect all workers in the Thai seafood processing sectors from child labor, forced labor, and human trafficking. To support the overall goal, the project design includes a project objective, 4 outcomes, and 13 outputs, as illustrated in Exhibit 1.

### **Exhibit 1. Fair Fish Project Objective, Outcomes, and Outputs**

<p><b>Project Objective: To reduce forced labor and human trafficking in the recruitment of women and men in seafood processing sector in Thailand</b></p>
<p><b>Outcome 1: Improved understanding of the nature of forced labor and human trafficking in the recruitment of workers</b></p> <p>Output 1.1: Targeted outreach messages to recruiters, company staff, and workers about forced, human trafficking, labor rights, and responsible recruitment disseminated</p> <p>Output 1.2: Stakeholders participating in information sharing and lessons learned events</p> <p>Output 1.3: Responsible recruitment-related reports documented and disseminated</p>
<p><b>Outcome 2: Improved company-led approaches to address forced labor and human trafficking in the recruitment process</b></p> <p>Output 2.1: Pilot companies provided with technical assistance and tools for responsible recruitment</p> <p>Output 2.2: Responsible recruitment model(s) piloted</p>
<p><b>Outcome 3: Improved compliance with recruitment policies and procedures by third-party recruiters</b></p> <p>Output 3.1: Targeted technical assistance sessions to targeted recruitment agencies provided</p> <p>Output 3.2: Targeted recruitment agencies’ policies and procedures revised and/or developed</p> <p>Output 3.3: Internal monitoring system to consistently track implementation of targeted recruitment agencies’ policies established and operating</p> <p>Output 3.4: Third-party recruiters trained on the responsible recruitment model curriculum</p>
<p><b>Outcome 4: Increased action on promoting responsible recruitment policies and practices among private sector actors</b></p> <p>Output 4.1: Responsible recruitment business case documented and distributed</p> <p>Output 4.2: Communications packages for promotion of responsible recruitment practices developed and disseminated</p>

**Project Objective: To reduce forced labor and human trafficking in the recruitment of women and men in seafood processing sector in Thailand**

Output 4.3: Private sector companies, business associations, and recruitment agencies engaged

Output 4.4: Pilot companies' implementation of working conditions policy in response to the effect of COVID-19 pandemic on workers and their families

The original project design did not include Output 4.4. This output, which includes actions to mitigate the impact of COVID-19 on workers and their families, was developed based on a concept note that FAIR Fish project staff developed and submitted to Plan International USA that reviewed the concept note and submitted it to USDOL for approval in April, 2020. USDOL approved Output 4.4 on June 9, 2020.

Exhibit 2 shows the primary interventions for the corresponding outcomes and outputs.

**Exhibit 2. Primary Interventions**

Outcomes and Outputs	Interventions
<b>Outcome 1: Improved understanding of the nature of forced labor and human trafficking in the recruitment of workers</b>	
<p>Output 1.1: Targeted outreach messages to recruiters, company staff, and workers about forced, human trafficking, labor rights, and responsible recruitment disseminated</p> <p>Output 1.2: Stakeholders participating in information sharing and lessons learned events</p> <p>Output 1.3: Responsible recruitment-related reports documented and disseminated</p>	<ul style="list-style-type: none"> <li>▪ Outreach messages via hard copies and social media mechanisms (i.e. Facebook) to recruiters, seafood processing companies, and workers. Also includes a responsible recruiting app for mobile phones.</li> <li>▪ Quarterly information sharing and learning meetings for the pilot companies and recruiting agencies as well as other key stakeholders interested in responsible recruiting practices.</li> <li>▪ Key project technical reports, such as parts of the pre-situational assessment (technical brief), key practices report, and mapping of migrant routes.</li> </ul>
<b>Outcome 2: Improved company-led approaches to address forced labor and human trafficking in the recruitment process</b>	
<p>Output 2.1: Pilot companies provided with technical assistance and tools for responsible recruitment</p> <p>Output 2.2: Responsible recruitment model(s) piloted</p>	<ul style="list-style-type: none"> <li>▪ Technical assistance to pilot companies on responsible recruiting practices, including national and international laws, regulations, and standards.</li> <li>▪ Responsible recruiting model (RRM) for pilot companies.</li> <li>▪ Pilot company recruiting policies and procedures.</li> </ul>
<b>Outcome 3: Improved compliance with recruitment policies and procedures by third-party recruiters</b>	
<p>Output 3.1: Targeted technical assistance sessions to targeted recruitment agencies provided</p> <p>Output 3.2: Targeted recruitment agencies' policies and procedures revised and/or developed</p>	<ul style="list-style-type: none"> <li>▪ Coaching to pilot recruiting agencies on responsible recruiting practices, including national and international laws, regulations, and standards.</li> <li>▪ Pilot recruiting policies and procedures.</li> <li>▪ Internal recruitment monitoring system to track implementation of the pilot recruitment agencies' policies and procedures.</li> </ul>

Outcomes and Outputs	Interventions
<p>Output 3.3: Internal monitoring system to consistently track implementation of targeted recruitment agencies' policies established and operating</p> <p>Output 3.4: Third-party recruiters trained on the responsible recruitment model curriculum</p>	<ul style="list-style-type: none"> <li>▪ Responsible recruiting training for 150 recruiters in Myanmar, Cambodia, and Thailand who recruit migrant workers specifically for Thailand.</li> </ul>
<p><b>Outcome 4: Increased action on promoting responsible recruitment policies and practices among private sector actors</b></p>	
<p>Output 4.1: Responsible recruitment business case documented and distributed</p> <p>Output 4.2: Communications packages for promotion of responsible recruitment practices developed and disseminated</p> <p>Output 4.3: Private sector companies, business associations, and recruitment agencies engaged</p> <p>Output 4.4: Pilot companies' implementation of working conditions policy in response to the effect of COVID-19 pandemic on workers and their families</p>	<ul style="list-style-type: none"> <li>▪ Cost benefit analysis (CBA) to make a business case for why seafood processors should invest in responsible recruiting practices.</li> <li>▪ Communication packages to promote responsible recruitment practices.</li> <li>▪ Engagement with key players including seafood processing companies, business associations, and recruiting agencies.</li> <li>▪ Distribution of PPE and information, education, and communication (IEC) materials to Thai and migrant workers of the pilot companies, their family members residing with them in Thailand, Thai and migrant workers of key product suppliers and business partners of the pilot companies, as well as Thai and migrant workers of the seafood processing companies near the pilot companies</li> </ul>

The project's strategy consists of a four-pronged approach that corresponds to the four outcomes noted in Exhibit 1.

- Ensure key stakeholders fully understand forced labor and human trafficking.<sup>21</sup>
- Act to develop responsible recruitment policies and procedures for seafood processing SMEs.
- Ensure seafood processing companies customize business social compliance mechanisms so they comply with responsible recruiting policies and procedures.
- Promote responsible recruiting policies and procedures to other SMEs, recruiting agencies, investors, and buyers.

<sup>21</sup> The key stakeholders include seafood processing companies and associations, recruiting agencies, government, and NGOs focused on migrant rights,

The direct beneficiaries of the project are two small seafood processing companies and four recruiting agencies. The seafood processing companies and recruiting agencies serve as pilots to test the project's responsible recruiting model (RRM) and eventually roll it out to as many SMEs in the seafood processing sector as possible under Outcome 4. The pilot companies are the Rayong Fish Sauce Industry Co, Ltd. and Marine Fine Foods Co, Ltd., located in Rayong province. The four pilot recruiting agencies are 8Tidgoodpower, Global Events, Central Unity Group Service, and Billion Thai Supply Group, all located in the greater metropolitan Bangkok area. The indirect beneficiaries of the project are migrant workers, primarily from Myanmar and Cambodia, who are susceptible to labor abuse practices including forced labor and human trafficking.

**Exhibit 3. Map of Thailand**



## **2. Evaluation Objectives and Methodology**

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### **2.1. Evaluation Objectives**

As noted in the Terms of Reference (TOR), the objectives of this interim performance evaluation are to:

1. Assess the relevance of the project in the country’s cultural, economic, and political context, as well as the validity of the project design and the extent to which it is suited to the priorities and policies of the host government and other national stakeholders.
2. Determine whether the project is on track toward meeting its objectives, identify the challenges and opportunities encountered in doing so, and analyze the driving factors for these challenges and opportunities.
3. Assess the effectiveness and efficiency of the project’s strategies, as well as the project’s strengths and weaknesses in implementation and identify areas in need of improvement.
4. Provide conclusions, lessons learned, and recommendations.
5. Assess the project’s plans for sustainability at local and national levels and among implementing organizations and identify steps to enhance its sustainability.

The scope of this interim evaluation includes a review and assessment of all USDOL activities carried out under the cooperative agreement. All activities implemented from project launch through the time of evaluation’s data collection have been considered.

The evaluation provides an assessment for USDOL, Plan, and other key stakeholders of the project’s performance, its effects on project participants, and an understanding of the factors driving the project results so changes can be made to improve performance. The evaluation is also meant to inform USDOL, Plan, and stakeholders of the design and implementation of subsequent phases or future projects focused on responsible recruiting practices for migrant workers.

### **2.2 Evaluation Questions**

The evaluation team, with input from USDOL and Plan, developed a set of 12 questions to guide the evaluation. The evaluation questions, which are listed below in Exhibit 4, are organized according to the Organization for Economic Cooperation and Development (OECD) Development Assistance Committee (DAC) criteria (relevance, effectiveness, efficiency, and sustainability).<sup>22</sup>

#### **Exhibit 3. Key Evaluation Questions**

<b>Relevance</b>
<ol style="list-style-type: none"><li>1. To what degree is the project design, theory of change, and intervention logic appropriate and adequate to combat forced labor and human trafficking in the seafood processing sector in Thailand?</li><li>2. To what extent are the project strategies relevant to the specific needs of project participants, communities, and other stakeholders?</li></ol>

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<sup>22</sup> <https://www.oecd.org/dac/evaluation/daccriteriaforevaluatingdevelopmentassistance.htm>

3. In what ways and how well has the project integrated the current laws and regulations regarding forced labor and human trafficking into the project activities?

#### **Effectiveness**

4. To what extent is the project making progress towards its primary objective and planned outcomes? What are the key results achieved so far, specifically regarding improving the:
  - a) Understanding of forced labor and human trafficking in recruitment for the seafood processing industry.
  - b) Company led approaches to addressing forced labor and human trafficking in the recruitment process.
  - c) Compliance with recruitment policies and procedures by third-party recruiters.
  - d) Promotion of responsible recruitment policies and practices among the private sector.
5. What are the key internal or external factors that limit or facilitate achievement of project outcomes?
6. How effective are the project's intervention and management strategies? What are the key strengths and weaknesses in project implementation and management? What areas need improvement?
7. Does the project's Comprehensive Monitoring and Evaluation Plan (CMEP) provide an effective means to monitor project progress and achievements; and to what extent has it been effectively used by the project to inform management decision-making?
8. To what extent has gender mainstreaming been addressed by the project? Has the project integrated gender equality as a crosscutting concern throughout its methodology and all deliverables?

#### **Efficiency**

9. Were the project activities efficient in terms of financial and human resources in relation to its results and outputs? What factors, if any, facilitated (i.e., strong collaboration with pilot companies) or hindered (i.e. delays in implementing activities and COVID-19) efficiency?

#### **Sustainability**

10. Has the project developed a detailed sustainability plan and exit strategy? What steps have been taken to implement the plan and what additional steps might the project take?
11. To what extent are the project's plans for sustainability adapted to the local level, national level, and capacity of implementing partners?
12. Are there any factors that are likely to limit or facilitate the technical or financial sustainability of project results?

## **2.2 Methodology**

### **Evaluation Team**

The evaluation team consisted of the lead evaluator and assistant evaluator. Dan O'Brien served as the lead evaluator and was responsible for developing the data collection instruments and protocols, conducting the key informant interviews with USDOL, Plan International USA, FAIR Fish project staff, and key stakeholders including pilot companies, recruiting agencies, seafood processing associations, government, and NGOs. Mr. O'Brien also was responsible for analyzing data and preparing the draft and final versions of the evaluation report. Kanchana Di-ut served as

the assistant evaluator. Ms. Di-ut, based in Bangkok, Thailand, was responsible for conducting key informant interviews with migrant workers.

## **Evaluation Schedule**

The evaluation team completed a project document review between December 2020 and January 2021 in advance of fieldwork. Team. The team also designed and developed the evaluation questions and methodology and submitted them in a terms of reference (TOR) document to ILAB and Plan teams on January 4, 2021. The data collection instruments were developed between February 8 and 9, 2021. Given travel restrictions related to COVID-19 pandemic, the evaluation team conducted all key informant interviews remotely between February 15 and March 31, 2021. The evaluation lead analyzed the data from April 1 to April 9, 2021 while evaluation report writing took place between April 12 and May 19, 2021.

## **Evaluation Approach**

The evaluation team used a mixed-methods evaluation design with a dominant qualitative approach. To protect the evaluation team, project staff, and other key stakeholders from COVID-19 infection, fieldwork consisted of conducting all interviews remotely using platforms such as Zoom, LINE, and Microsoft Meetings.<sup>23</sup> All interviews were conducted between February 15 and March 31, 2021.

The evaluation team used semi-structured interview protocols, making adjustments based on interviewees' background, role in the project, and relevant knowledge. In addition, the evaluation team obtained quantitative data from the project's documents, reports, and budget. The lead evaluator triangulated quantitative and qualitative data for many of the evaluation questions to strengthen the credibility and validity of the results.

## **Data Collection**

The evaluation team developed the evaluation questions with input from USDOL, the FAIR Fish project team, and the IMPAQ evaluation team. The evaluation questions were used to develop data collection guides and protocols, which are listed in Annex B. The methods used by the evaluation team include:

*Document Reviews:* The evaluation team read numerous project documents and other reference publications including the project document, CMEP, pre-situational assessment, technical progress reports (TPR) and their annexes, cooperative agreement, research reports, and other supporting project materials obtained during the fieldwork component. Overall, the document reviews provided important background information for the evaluation. The TPRs and CMEPs were used to conduct quantitative and qualitative analysis of project performance. Annex C shows a complete list of documents reviewed.

*Key Informant Interviews:* The evaluation team interviewed a total of 32 stakeholders remotely in Thailand and the US. The lead evaluator interviewed project staff, representatives of the pilot

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<sup>23</sup> <https://www.cdc.gov/coronavirus/2019-ncov/about/index.html> and <https://www.who.int/emergencies/diseases/novel-coronavirus-2019>

seafood processing companies and recruiting agencies, government representatives, project sub-contractors and consultants, and other key stakeholders involved in the project. A Thailand-based assistant evaluator interviewed two migrant workers. The lead evaluator used a purposive, non-random sampling methodology to select beneficiaries to interview. Exhibit 5 summarizes the stakeholder groups interviewed. A complete list of individuals interviewed appears in Annex E.

**Exhibit 4. Number of Interviewees by Stakeholder Group and Gender**

Stakeholder Group	Female	Male	Total
FAIR Fish Project Staff	4	2	6
Pilot Companies (2 companies)	3	2	5
Pilot Recruiting Agencies (4 agencies)	2	5	7
Migrant Workers	1	1	2
The Food School (sub-contractor)	2	0	2
Seafood Associations (2 associations)	0	2	2
Migrant NGOs (2 NGOs)	0	2	2
Government (Ministry of Labor)	1	0	1
Plan (Thailand, USA)	2	1	3
USDOL (ILAB-OCFT)	1	1	2
<b>Total</b>	<b>16</b>	<b>16</b>	<b>32</b>

It should be noted that, in addition to document reviews and KIIs, the evaluation team intended to conduct focus group discussions with migrant workers at Rayong Fish Sauce. However, based on a recommendation from the company’s director of human resources that migrant workers would not feel comfortable being interviewed in a group setting, the evaluation team conducted individual interviews with 2 migrant workers.

**Data Analysis.** Qualitative data collected through interviews and the document reviews were analyzed using a matrix analysis to categorize, triangulate, synthesize, and summarize the raw data captured from the interview notes. Quantitative data collected from the TPRs and CMEP were analyzed by comparing end-of-project indicator targets to actual achievements and calculating variances. Quantitative data were also collected from the project budget and expenditure reports and used to calculate resource allocations to outcomes and expenditure rates. The results of the data analysis provided tangible blocks of information, which the lead evaluator used to write the evaluation report. The wealth and variety of information collected allowed for high-level reinforcement and synthesis across sources to obtain a more crosscutting and comprehensive analysis of the evaluation questions.

**Limitations.** The most significant limitation was conducting fieldwork remotely. In a few interviews, the signal was weak, which resulted in interference that made the conversation with stakeholders difficult to understand. To address this issue, the lead evaluator sent email messages

to seek clarification on points in his notes to ensure the notes represented what the interviewee intended to communicate. In addition, the time difference between Thailand, where project stakeholders are located, and El Salvador, where the lead evaluator is located, is 13 hours. Finding reasonable hours to interview presented a challenge. To address the time difference challenge, the data collection phase was extended by 2 weeks to the end of March to enable scheduling all key stakeholders for interviews.

That the assistant evaluator was able to interview only two migrant workers constituted another limitation because it reduced the number of migrant beneficiaries that provided opinions and views about the project. The initial plan was to conduct focus group discussions with one group of Thai workers at Marine Fine Foods and two groups of migrant workers from Myanmar and Cambodia at Rayong Fish Sauce. The Thai workers at Marine Fine Foods refused to be interviewed while Rayong Fish Sauce managers recommended conducting individual interviews because, according to the company, workers would not feel comfortable talking in front of co-workers. However, the company was only able to find one migrant worker from Myanmar and one migrant worker from Cambodia who were willing to be interviewed.

Finally, this evaluation is not a formal impact assessment. The evaluation findings were based on information collected from background documents, the project's monitoring and evaluation system, and key informant interviews. The accuracy of the evaluation findings is predicated on the integrity of information provided to the evaluation team from these sources and the ability of the evaluation team to triangulate this information.

### 3. Findings

#### 3.1. Relevance

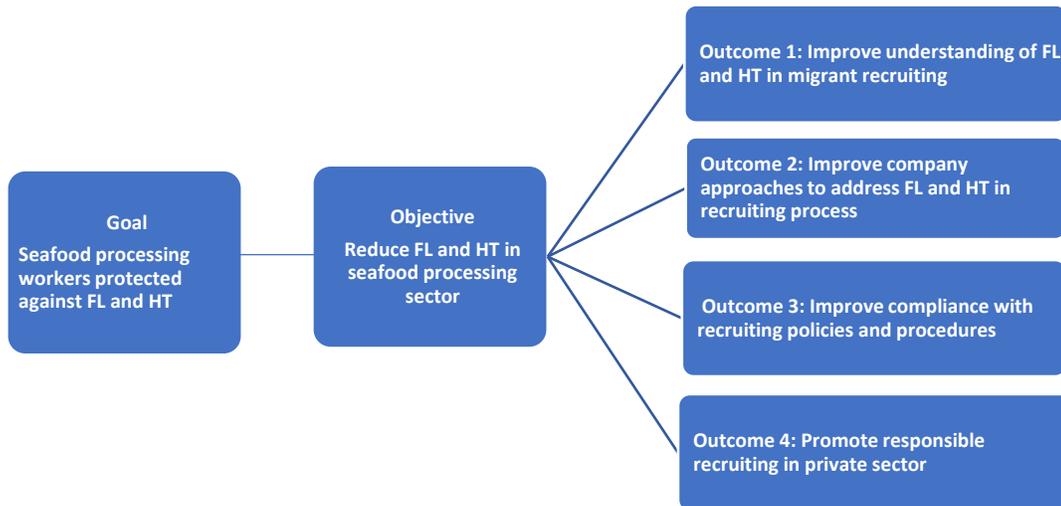
This section answers the first three evaluation questions:

1. To what degree is the project design, theory of change, and intervention logic appropriate and adequate to combat forced labor and human trafficking in the seafood processing sector in Thailand?
2. To what extent are the project strategies relevant to the specific needs of project participants, communities, and other stakeholders? Has the context changed to the extent that the project should begin to engage the government?
3. In what ways and how well has the project integrated the current laws and regulations regarding forced labor and human trafficking into the project activities?

##### 3.1.1. Appropriateness of FAIR Fish Theory of Change

The project’s theory of change (TOC) is reflected in the results framework (RF). Exhibit 6 shows an abbreviated version of the project’s RF. The RF hypothesizes that if outcomes 1 through 4 are achieved, forced labor and human trafficking in the seafood processing sector in Thailand will be reduced, and ultimately all seafood processing workers in Thailand will be protected against forced labor and human trafficking.

**Exhibit 5. Project’s Theory of Change**



Overall, the TOC is conceptually sound and logically coherent to address forced labor and human trafficking in seafood processing sector in Thailand. However, after 2 years of implementation, several issues have surfaced that threaten the TOC logic. These are summarized in Exhibit 7.

### Exhibit 6. Analysis of Project Objective and Outcomes

Project Objective and Outcomes	Analysis
<b>Project Objective</b>	The project objective's only indicator is the level of compliance with international standards for responsible recruitment for the two pilot companies. However, even if the two pilot companies achieve an acceptable level of compliance, <b>the overall impact on human trafficking and forced labor in the seafood processing sector will be minuscule because the pilot companies only employed 52 migrant workers</b> at the time of the interim evaluation. In addition, the indicator does not capture the promotion and eventual adoption of the responsible recruiting model and tools planned under Outcome 4.
<b>Outcome 1</b>	Outcome 1's indicator is percent increase in understanding of forced labor and human trafficking measured by self-assessments of the participants in the quarterly information sharing and learning meetings. <b>Due to low and inconsistent participation in the meetings, only five persons participated in the self-assessment survey, which is a small sample from which to draw conclusions and any increase in understanding.</b> In addition, the project has also disseminated IEC materials and technical reports to a broader audience than those who participate in the quarterly information sharing and learning meetings and intends to reach companies, recruiting agencies, and migrant workers with messages about forced labor, human trafficking, and responsible recruiting via a mobile application. The Outcome 1 indicator does not capture these efforts.
<b>Outcome 2</b>	The two pilot companies only employ 52 migrant workers. <b>Marine Fine Foods does not employ, nor does it intend to employ migrant workers. Rayong Fish Sauce employs 52 migrant workers and intends to recruit an additional 8 to 10 migrant workers</b> to reach a target number of 60 migrant workers. Furthermore, <b>Rayong Fish Sauce has not been able to implement the RRM because the company has not been able to recruit migrant workers due to border closings</b> and other measures taken by the Thai government to mitigate the spread of COVID-19.
<b>Outcome 3</b>	<b>The four pilot recruiting agencies do not recruit migrant workers for the two pilot companies, nor do they specifically recruit migrant workers for the seafood processing sector as envisioned in the project design.</b> In addition, the pilot recruiting agencies have not been able to implement the improved recruiting policies and procedures due to the border closings noted above. To further weaken the effect of Outcome 3, the evaluation team learned that one pilot recruiting agency went out of business and another suspended operation and may go out of business in the near future.
<b>Outcome 4</b>	Achievement of the project objective, to reduce forced labor and human trafficking in the seafood sector in Thailand, is dependent on the extent to which Outcome 4 is achieved and that a significant number of SMEs in the seafood processing sector adopt and implement the responsible recruiting and tools. However, the project has had difficulties convincing seafood processing SMEs to participate in the project. <b>The ability of the project to engage and form alliances with relevant organizations to help promote the model and the project's ability to make a compelling business case to SMEs to use the model to develop and implement key responsible recruiting policies and procedures, which will be critical to achieving Outcome 4.</b>

### 3.1.2. Relevancy of the FAIR Fish Project Strategies

According to the FAIR Fish project document, the project's strategy to reduce forced labor and human trafficking in the recruitment of migrant workers in the Thai seafood processing sector consists of the following four approaches:<sup>24</sup>

1. Employers, recruiters, and workers increase their understanding of forced labor and human trafficking concepts, dimensions, and consequences.
2. SMEs (including recruiting agencies) operating in the seafood processing sector develop realistic standards for responsible recruitment policies, procedures, and practices to prevent forced labor and human trafficking.
3. Seafood processing SMEs and recruiting agencies customize business social compliance mechanisms to ensure their compliance with responsible recruitment policies and procedures.
4. Seafood processing SMEs and project partners promote responsible recruiting policies and procedures to their investors and buyers, as well as to other SMEs.

Based on interviews with key stakeholders, the project's strategies are still relevant to the specific needs of project participants, communities, and other stakeholders. For example, the pilot companies and recruiting agencies believe that efforts to increase their understanding of forced labor and human trafficking and the development of the RRM and policies and procedures will help improve their recruiting practices so they can meet international standards and access international markets. The seafood processing associations and NGOs focused on migrant rights also believe the project's strategies will help address unscrupulous recruiting practices and benefit migrant workers. Finally, the migrant workers believe the RRM, and policies and procedures developed by the pilot companies will help protect migrant workers and their families against labor rights abuses.

One issue that surfaced during interviews with key informants is the consolidation of the seafood processing sector in Thailand. Representatives of the pilot companies, recruiting agencies, seafood processing associations, and civil society organizations told the evaluation team that they noticed that large numbers of SMEs in the seafood processing sector have gone out of business due to a combination of the enforcement of recent Thai laws and regulations and the negative economic impact of COVID-19.<sup>25</sup> According to these key informants, many migrant workers who lost their jobs when these SMEs went out of business have been absorbed by larger companies. If this is the case, the project might consider adjusting its promotion strategy under Outcome 4 to include targeting larger companies, especially those that export to international markets and whose migrant workers are at risk for abusive labor practices.

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<sup>24</sup> These four project strategies come directly from the project document: Section 4.1 Project Strategy (page 17).

<sup>25</sup> Royal Ordinance on Fisheries B.E. 2558 (2015) and the Royal Decree on Managing the Work of Aliens B.E 2560 (2017)

### 3.1.3. Engagement of the Royal Thai Government

The project should engage the Ministry of Labor/Department of Employment so it can help convince more companies to adopt responsible recruiting practices. The recruiting agencies listen to the Ministry of Labor more than NGOs.

*Recruiting Agency Representative*

In the project solicitation, USDOL did not envision a specific government engagement strategy. Instead, USDOL viewed the FAIR Fish project focusing on the private sector to pilot and roll out innovative approaches of responsible recruiting aimed at addressing forced labor and human trafficking. In general, project staff and partners agree with this approach because it allowed the project to focus on developing responsible recruiting practices with the two pilot companies and four recruiting agencies.

As noted in the text box, both project staff and many of the key informants who were interviewed believe that the time has come to begin engaging the government so it might support the project's objectives as well as help sustain key outputs and outcomes. For example, the Thai government has not adopted "zero recruitment fees" policy, which discourages companies from fully complying with the international standards on responsible recruitment. Also, the Ministry of Labor (MOL) could place responsible recruitment in its policy agenda and influence companies and recruiters to adopt the model under Outcome 4, which would help ensure that the model will continue to be implemented after the project ends.

In response, the project recently developed a government engagement concept note, which USDOL has approved. The key aspects of the concept note are summarized below:

- Engagement of key MOL departments including Department of Employment (DOE) for policy issues and the Foreign Workers Administration Office (FWAO) for implementation issues.
- Encourage MOL to recognize and promote the RRM and develop a strategy to sustain the model after the FAIR Fish project ends.

During the interim evaluation, FAIR Fish project staff met with MOL representatives to present the project and examine ways to engage with MOL. In principle, the MOL is interested in collaborating with the project and has appointed a contact person who was interviewed. As noted in the text box, the MOL representative commented that the MOL looks forward to working with the project to advance responsible recruiting principles.<sup>26</sup>

I think it was the right decision to work with the pilot companies and recruiting agencies first to gain experience and get some results. I think the project is going in the right direction. But now it is time to engage with the MOL so we can expand to other areas. The MOL has a shortage of resources so partnering will allow us to leverage each other's resources.

*Ministry of Labor*

<sup>26</sup> The meeting was chaired by the Assistant Permanent Secretary of the Ministry of Labour. Twenty-one participants attended the meeting including representatives from the Office of Permanent Secretary, Department of Employment, Department of Labour Protection and Welfare, Office of the Public Sector Development Commission, and Plan Thailand.

### 3.1.4. Integration of Forced Labor and Human Trafficking Laws and Regulations

The project used a range of Thai laws and other instruments such as announcements, regulations, decrees, and ordinances to develop the RRM including policies and procedures for both the pilot companies and recruiting agencies. Thai laws were also used to train and coach the pilot companies and recruiting agencies. Exhibit 8 shows the complete list of Thai laws used to develop the model and the policies and procedures.

#### Exhibit 7. Thai Labor Laws Used to Develop RRM and Tools

- Labor Protection Act B.E 2541 (1998) – Sections 96, 98-99, 109
- Labor Protection Act B.E 2541 (1998) – Sections 15, 43, 53
- Labor Protection Act B.E 2541 (1998) – Sections 10-12, 17, 29-36, 39/1, 116-121
- Labor Protection Act B.E 2541 (1998) – Sections 24-28, 56-63, 114-115
- Labor Protection Act B.E 2541 (1998) – Sections 38-42
- Labor Protection Act B.E 2541 (1998) – Sections 44, 45 -52, 148/1-2
- Labor Protection Act B.E 2541 (1998) – Sections 40, 45-52
- Labor Protection Act B.E 2541 (1998) – Section 20 (non-continuous employment)
- Labor Protection Act B.E 2541 (1998) – Sections 24 (involuntary overtime), 28 (weekly holiday); B.E. 2551 (2008), Sections 4,5 (security deposit prohibited)
- Labor Protection Act B.E 2562 (2019)– Sections 9, 17/1, 53, 57/1, 59, 70, 75, 120, 120/1
- Labor Protection Act B.E 2562 (2019) – Section 51
- Labor Relations Act B.E. 2518- 12
- Child Protection Act of 2003
- Alien Work Act B.E. 2551, Section 24.A (permit kept with holder at place of work)
- Occupational Safety, Health and Environment Act B.E. 2554 A.D. 2011
- Collusion Act
- Ministerial Regulation on the Protection of Labor in Fisheries B.E. 2557 (2014)
- Anti-Trafficking in Persons Act B.E. 2551 (2008, amended in 2015)
- Royal Ordinance on Fisheries B.E. 2558 (2015)
- Anti-Corruption Act B.E. 2551 (2008), amended B.E.2559 (2016)
- Human Trafficking Criminal Procedure Act B.E. 2559 (2016)
- Royal Decree Concerning Rules on Bringing Migrant Workers into the Kingdom for Employment B.E. 2559 (2016)
- Ministerial Regulation on Establishments Prohibited from Employment of Children under 18 years of age B.E. 2559 (2016)
- Foreigners' Working Management Emergency Degree (No.1), A.D. 2017
- 2019 Royal Enactment on the Amendment of the Anti-Trafficking in Persons Act B.E. 2551
- Bi-lateral Memorandum of Understanding on Cooperation in the Employment of Workers (Myanmar and Cambodia)

The project also used relevant International Labor Organization (ILO) conventions, United Nations (UN) conventions and declarations, and amfori's Business Social Compliance Initiative (BSCI) principles to inform the RRM and related policies and procedures. However, the Thai laws serve as the legal basis for the social compliance management system and the enforcement tools for ILO, UN, and BSCI guidelines and protocols.

According to TFS, all of the Thai laws and regulations played an important role in helping TFS develop the RRM policies and procedures. Nevertheless, the most important laws and regulations

include the Labor Protection Act, Royal Ordinance on Fisheries, Royal Decree Concerning Rules on Bringing Migrant Workers into the Kingdom for Employment, Royal Decree on Managing the Work of Aliens. In addition, the BSCI guidelines and protocols figured prominently in the RRM policies and procedures.

### 3.2. Effectiveness

This section addresses the following five evaluation questions related to effectiveness:

4. To what extent is the project making progress towards its primary objective and planned outcomes? What are the key results achieved so far, specifically regarding improving the:
  - a) Understanding of forced labor and human trafficking in recruitment for the seafood processing industry.
  - b) Company led approaches to addressing forced labor and human trafficking in the recruitment process.
  - c) Compliance with recruitment policies and procedures by third party recruiters.
  - d) Promotion of responsible recruitment policies and practices among the private sector.
5. What are the key internal or external factors that limit or facilitate achievement of project outcomes?
6. How effective are the project’s intervention and management strategies? What are the key strengths and weaknesses in project implementation and management? What areas need improvement?
7. Does the project’s CMEP provide an effective means to monitor project progress and achievements; and to what extent has it been effectively used by the project to inform management decision-making?
8. To what extent has gender mainstreaming and child safeguarding been addressed by the project? Has the project integrated gender equality as a crosscutting concern throughout its methodology and all deliverables?

#### 3.2.1. Assessment of Project Performance

Exhibit 9 provides a summary of the achievements of the project’s objective and four outcome level indicators. The complete project performance analysis of outcomes and outputs using CMEP information appears in Annex C. As stipulated in the TOR, Annex C also includes an assessment of the achievement of the project’s objective and outcomes using a rating scale (low, moderate, above-moderate, and high achievement categories). Note that the analysis is based on information provided in the April, 2021 TPR and its annexes, which USDOL has not yet fully reviewed. Although USDOL was reviewing the TPR at the time the draft of the interim evaluation report was being finalized, USDOL expects that all data in the draft report are accurate and reliable.

Objectives	Indicators	Performance
Project Objective: To reduce forced labor and human trafficking in the recruitment of women and men in	Level of compliance with international standards for responsible recruitment	Rayong Fish Sauce was fully compliant with international standards, while Marine Fine Foods has not participated in the final compliance assessment because its staff has not been available.

Objectives	Indicators	Performance
seafood processing sector in Thailand		<p>The indicator, however, is inadequate to measure achievement of the project objective because the two pilot companies employ very few migrant workers. Marine Fine Foods does not employ, nor does it intend to recruit migrant workers. Rayong Fish Sauce employs 52 migrant workers and plans to recruit an additional 8 to 10 migrant workers but no more.</p> <p>A more appropriate indicator would have been the number of seafood processing companies that use the RRM guidelines to develop and implement key policies and procedures to address forced labor, human trafficking, and responsible recruiting.</p>
Outcome 1: Improved understanding of the nature of forced labor and human trafficking in the recruitment of workers	Percentage change in the level of understanding of the nature of forced labor and human trafficking in the recruitment of workers	<p>Due to low and inconsistent participation in the quarterly information sharing and learning meetings, only five persons participated in the self-assessment survey. All five persons (100%) reported an increase in understanding. However, five persons is a small sample that makes it difficult to draw any conclusions about improvement in understanding.</p> <p>In addition, the project intends to disseminate IEC materials, technical reports, and messages about forced labor, human trafficking, and responsible recruiting to a broader audience than those who participate in the quarterly information sharing and learning meetings.<sup>27</sup> The Outcome 1 indicator does not capture these efforts.</p>
Outcome 2: Improved company-led approaches to address forced labor and human trafficking in the recruitment process	Level of policy and procedural compliance with international standards for responsible recruitment	Rayong Fish Sauce and Marine Fine Foods were found to be fully compliant because they developed policies and procedures on responsible recruitment that meet international standards. However, neither company has fully implemented the policies and procedures because they are not currently recruiting migrant workers and because the companies believe that some of the policies are not feasible to implement. <sup>28</sup>
Outcome 3: Improved compliance with recruitment policies and procedures by	Level of compliance of third-party recruiters with international standards for	<p>The baseline assessment indicated that three recruiting agencies were non-compliant while one was partially compliant with international standards.</p> <p>The project has not been able to conduct the endline compliance assessment to assess progress because the</p>

<sup>27</sup> Of 54 stakeholder that participated in at least one meeting, only 5 completed the self-assessment survey. The project used a purposive sample criterion of attending at least 3 of 6 sessions. Since these 5 were not randomly selected from the total population of 54, the results cannot be generalized. Thus, it would have been useful to have a larger number of stakeholders to have taken the survey. Based on the experience of the evaluator with qualitative evaluations, a sample of at least 14 (25 percent) would have helped achieve a deeper understanding of improvements in understanding.

<sup>28</sup> Rayong Fish Sauce does not intend to implement some parts of the RRM, such as limits on overtime hours, because it is not feasible. According to Rayong Fish Sauce, migrant workers request as many overtime hours as possible to earn more money and if the company is trying to fill orders, it provides the overtime hours.

Objectives	Indicators	Performance
third-party recruiters	responsible recruitment	recruiting agencies have not been available due to heavy workloads of key staff. The project intends to conduct the endline assessment in April or May 2021 and report the achievements in the October 2021 TPR.
Outcome 4: Increased action on promoting responsible recruitment policies and practices among the private sector	Number of activities in which project stakeholders use FAIR Fish materials to promote responsible recruitment	Based on the project’s sequencing of activities, Outcome 4 activities are scheduled to take place after the RRM has been piloted and the pilot recruiting agencies have developed responsible recruiting policies and procedures and have established their internal compliance monitoring systems. Therefore, at the time of the interim evaluation, the project was just beginning to implement Outcome 4 activities and, thus, did not report major achievements under Outcome 4.  Outcome 4.4, which consists of activities to prevent and mitigate the spread of COVID-19, has been delayed nearly a year due to problems with developing COVID-19 IEC materials. This is unfortunate because the number of Thai’s infected by COVID-19 has risen steeply since December 2020.

**3.2.2. Factors Facilitating and Hindering Implementation**

**Facilitating Factors**

**Pilot Companies.** The project decided to invite the two pilot companies, Marine Fine Foods and Rayong Fish Sauce, to participate in the project because Plan Thailand had established a trusting relationship with them during the implementation of a previous project called Stopping Exploitation through Accessible Services (SEAS). Familiarity with Plan Thailand and the trusting relationship built during the SEAS project allowed the FAIR Fish project to begin working with the companies almost immediately after the project started activities.

**Constructive Engagement.** According to project and as noted in the project’s reports, the FAIR Fish project decided to approach and work with the pilot companies and recruiting agencies in a constructive manner that built trust and facilitated the implementation of project activities. Rather than criticize seafood processing companies and recruiters over their human rights records like some NGOs in Thailand do, the project opted to constructively engage these companies to identify recruiting-related problems and find solutions based on international standards. For example, the project, through its contract with TFS, worked with pilot companies and recruiting agencies to review and understand the importance of international recruiting compliance standards and the potential impact of compliance on either increasing or decreasing international business opportunities. TFS provided technical assistance and coaching to pilot companies and recruiting agencies to develop responsible recruiting policies and procedures in a participatory and non-threatening way that helped create ownership of these policies and procedures.

**The Food School.** The Food School (TFS) is a private consulting firm committed to promoting transparency and accountability in the recruitment and employment of workers in the seafood processing sector in Thailand. TFS is one of the few local organizations specializing in consulting,

training, and auditing in fishing and seafood supply chains. Given its technical expertise on migrant labor issues in the seafood processing sector, TFS effectively worked with pilot companies and recruiting agencies to develop the RRM and policies and procedures and provide technical assistance and coaching to these companies. Based on interviews, the pilot companies and recruiting agencies believe that the technical assistance and coaching that TFS provided was effective because it helped them learn about international recruiting standards and how to incorporate them in policies and procedures.

The March 2020 TPR documented a concern about the technical assistance and coaching provided by the TFS technical team. According to the TPR, participants from the pilot companies and recruiting agencies said it was difficult at times to understand the TFS technical expert because some technical terms were unfamiliar and TFS should have explained the terminology in more detail. During interviews, some project staff members also said that the TFS technical expert, who is not a native Thai speaker, had trouble explaining some terms and project staff members had to translate. Based on these concerns, the evaluation team included questions in the interview guides about the ability of TFS to communicate effectively in Thai and the overall quality of the technical assistance and coaching provided by TFS. As noted in the text box, representatives from both the pilot companies and recruiting agencies who were interviewed did not view language as a barrier and opined that technical assistance and coaching provided by TFS was effective and useful.

***FAIR Fish Staff.*** The pilot companies and recruiting agencies believe that the FAIR Fish staff facilitated implementation because they are highly dedicated and motivated to work on migrant issues such as forced labor and human trafficking in the seafood processing sector in Thailand. For example, the companies and agencies credit project staff for providing useful and timely information as needed. Those stakeholders participating in the quarterly information sharing and learning meetings appreciated how the meetings were organized, facilitated, and reported.

***COVID-19.*** The COVID-19 pandemic has been both a facilitating and hindering factor in project implementation. On the facilitating side, the border closures to mitigate the spread of COVID-19 halted recruitment of migrant workers that, in turn, allowed recruiting agencies to participate in the project at a level that may not have been possible if the agencies were fully engaged in recruiting workers. The recruiting agency staff had more time available to participate in development of policies and procedures and coaching sessions.

***Technologies.*** In March 2020, to keep COVID-19 from spreading to any staff members or beneficiaries and stakeholders, Plan Thailand instructed the project staff to work from home and advised against organizing meetings that brought large groups of people together. These COVID-19 prevention and mitigation measures forced the project to use alternative technologies such as Zoom and LINE to conduct meetings and training sessions. TFS and several of the representatives from pilot companies and recruiting agencies opined that the use of Zoom, LINE, and other technologies to communicate worked reasonably well. TFS and the pilot companies and recruiting agencies also noted that remote information sharing and learning meetings facilitated participation in the sense that they did not have to travel by car to meeting venues where they usually encounter major traffic jams in the Bangkok metropolitan area.

## Hindering Factors

**COVID-19.** As noted previously, COVID-19 has been both a facilitating and hindering factor. On the hindering side, the border closings aimed to mitigate the spread of COVID-19 mean that the pilot companies and recruiting agencies have not been able to recruit migrant workers and, consequently, implement and test the RRM and policies and procedures. Border closings have also hindered the cost benefit analysis (CBA), critical to making a strong business case to implement the RRM and forced the project to cancel its plan for TFS to conduct three training of trainer (TOT) workshops for responsible recruiting trainers in Myanmar and Cambodia.

I think many recruiting companies do not see the benefits of implementing responsible recruiting practices. My company is participating because I am curious to know the international standards so maybe I can get new customers. If the buyer countries can acknowledge the model, it would be a good motivator to adopt the model.

*Pilot Recruiting Agency Representative*

**Pilot Companies.** The project's decision to invite two seafood processing companies that Plan Thailand worked with in the SEAS project was noted as a facilitating factor because it allowed the project to start working with these companies quickly. However, as noted in the text box, the fact

We have not implemented the model yet because we are not recruiting migrant workers and do not have plans to recruit them. The project should find companies that have migrant workers and plan to recruit more so they can use the model.

*Pilot Company Representative*

that the two pilot companies employ 52 migrant workers should be considered a hindering factor. Marine Fine Foods does not employ nor does it intend to recruit migrant workers, while Rayong Fish Sauce employs approximately 52 migrant workers out of a total workforce of 197 workers and has plans to recruit another 8 to 10 migrant workers, but no more.<sup>29</sup> In the opinion of the evaluation team as well as some project staff, only one pilot company that employs 52 migrant workers with plans to recruit only 8 to 10 more will make it difficult to test the

RRM and tools and conduct a meaningful CBA.

<sup>29</sup> It should be noted at the inception of the project, Marine Fine Foods employed one migrant worker who later resigned to return to Myanmar.

To convince more companies to adopt the model, the project should reach out to companies at the provincial level, the coastal provinces. The project needs to approach fishing associations in the coastal provinces to help identify SMEs in food processing. The associations in the provinces have a list of SMEs in the seafood sector. The Department of Fishing at provincial level, which is in the provincial governor's office, also has lists of companies and can also help make contact.

***Pilot Company Representative***

***Pilot Recruiting Agencies.*** The project document assumed that the project would work with the pilot companies' recruiting supply chain, including agencies that specifically recruit for the pilot companies. As noted in the text box, the project experienced difficulty finding recruiting agencies to participate in the project because they did not understand or value the benefits of participating. Despite difficulty finding recruiting agencies to participate, the project eventually identified four agencies: 8Tidgoodpower, Global Events, Central Unity Group Service, and Billion Thai Supply Group. Unfortunately, none of the four agencies recruits for the two pilot companies nor specifically recruits for the seafood processing sector. It should be mentioned, according to project staff, that the

project tried to convince the agency that recruits for Rayong Fish Sauce to join the project, but the agency declined to participate.

While these recruiting agencies have developed responsible recruiting policies and procedures that they can apply to recruiting migrant workers for the manufacturing, construction, and agriculture sectors, they will have little or no impact on the seafood processing sector. Furthermore, during the evaluation, the evaluation team learned that one recruiting agency, 8Tidgoodpower, went out of business while another, Central Unity Group Service, suspended operations and will likely close its business in the near future.

***Interest of SMEs.*** In addition to Marine Fine Foods and Rayong Fish Sauce, the project identified a third pilot company to participate, Tey Seng Cold Storage. However, after Tey Seng Cold Storage learned more about the project and requirements to participate, it decided to discontinue its participation because its staff was busy with production orders and efforts to gain new business. In addition, the company was uncomfortable allowing its migrant workers to be interviewed because they might think that they receive fewer benefits than Thai workers and would not want to continue to work for the company. As noted in the text box, responsible recruiting is not a top priority for many seafood processing companies struggling to stay in business.

The project contacted the Thai Tuna Industry Association (TTIA) to seek assistance to find another seafood processing company to replace Tey Seng Cold Storage. TTIA agreed to communicate with its members to see whether any would be interested in participating in the FAIR Fish project. TTIA was unable to identify any of its members interested in participating. During an interview, a TTIA representative told the evaluation team that its SME members are very busy and do not see a business benefit to participating, such as access to new international markets. This comment is similar to those made by other stakeholders when asked why more seafood processing SMEs did not seem interested in the project. One company representative told the evaluation team that the project should work with seafood processing associations located in the coastal provinces and the Department of Fisheries located at the provincial governors' offices to help identify seafood processing SMEs.

I do not know much about the responsible recruiting policies and procedures. It would be helpful if the company would translate them to my language so I understand what they are and what they mean.

*Migrant Worker*

**Interest of Recruiting Agencies.** The project experienced difficulties identifying recruiting agencies to participate, which caused delays. To help identify recruiting agencies to participate, the project met with the Management of Migrant Workers Import and Service Trade Association (MWIS) to see if any of its members would be interested. MWIS did not respond. Next, the project contacted 2 other recruitment associations and 23 recruitment agencies. In addition, the project sent invitations to 166 recruitment agencies and 3 recruitment associations inviting them to attend the second quarterly learning and sharing session on April 2, 2020 in

Bangkok. Only five recruiting agencies attended, which would suggest a lack of understanding or lack of interest in responsible recruiting.

**Responsible Recruiting App.** The project contracted an international company to develop a responsible recruitment technology-based tool(s) (application (app) for mobile phones) to foster accountability in the recruitment process. Development of this app has been delayed due to a misunderstanding about the contract. During the content development workshop, Plan and the company realized that the contract did not specify how the content for the app's animation scripts would be developed. Plan expected that the content for the scripts would be developed from the RRM and cover eight responsible recruiting components while the company assumed that the content would be developed jointly in the content development workshop. Plan requested the company to address the eight responsible recruiting components in the RRM, which required several revisions that delayed the app's development. Plan modified the company's contract to extend the dates of the subsequent deliverables. The project expects the app to be completed by August, 2021.

**Language and Translation.** TFS developed the RRM including responsible recruiting policies and procedures in English and presented the model to companies and recruiting agencies in English. TFS and project staff had to interpret the documents to enable company and recruiting agency representatives to participate in a meaningful way. Project staff members as well as the companies and recruiting agency representatives opined that this hindered the process of developing and understanding the RRM and the related policies and procedures. These stakeholders believe it would have been more effective to make the presentation in Thai. As noted in the text box, the policies and procedures have not been translated into the native languages of the migrant workers so that they fully understand their rights as stated in the policies and procedures that are guiding the recruitment process.<sup>30</sup>

**COVID-19 PPE and IEC Materials.** Output 4.4 consists of activities to produce and distribute COVID-19 PPE and IEC materials to Thai and migrant workers of the pilot companies, their family members residing with them in Thailand, Thai and migrant workers of key product suppliers and

<sup>30</sup> According to the project, once these and other deliverables are submitted and approved by USDOL, they will be translated into the appropriate languages.

business partners of the pilot companies, as well as Thai and migrant workers of the seafood processing companies near the pilot companies.

Although USDOL approved Output 4.4 on June 9, 2020, at the time of the interim evaluation the PPE and IEC materials had not been distributed to workers and their families. Production of the IEC materials was delayed from October, 2020 to May, 2021, due to delays caused largely by a protracted materials development process. Because the project intends to provide the hard copies of the IEC materials together with the PPE in a tote bag, dissemination of the PPE will be placed on hold until the hard copies of the IEC materials are ready to disseminate.<sup>31</sup> The delay in implementing Output 4.4 is unfortunate because the daily rate of COVID-19 infections has been on a steep increase since December 2020. For example, the number of COVID-19 cases on December 20, 2020 was 5,289. On May 3, 2021, the number of new COVID-19 cases was 68,984.<sup>32</sup> At the time the evaluation report was being finalized towards the end of June 2021, the total number of COVID-19 cases had risen to 254,515.<sup>33</sup>

### 3.2.3. Effectiveness of the Project’s Interventions and Management Interventions

Exhibit 10 shows the strengths and weaknesses of each of the project’s interventions. The interventions are correlated to the project outputs. The recommendations to improve the interventions appear in the recommendations section.

**Exhibit 9. Strengths and Weaknesses of Project Interventions**

Intervention	Strengths	Weaknesses
Outreach messages via hard copies and social media mechanisms (i.e., Facebook) to recruiters, seafood processing companies, and workers. Also includes a responsible recruiting app for mobile phones.	Outreach messages are based on research including pre-situational assessment and the mapping of the recruitment supply chains and migratory routes. The evaluation team reviewed the storylines and considered them well conceived, interesting, and realistic.	Upon review of the social media mechanisms (largely Facebook), people reached (690) and engagements (77) appear relatively low. Regarding the responsible recruiting app, one of the inherent weaknesses is the development of new content. The project has resources to develop the first set of content. However, to keep users returning and recommending it to others, the app should be updated with new content.
Quarterly information sharing and learning meetings for the pilot companies and recruiting agencies as well as other key stakeholders interested	Participants that attend the meetings consider the meetings to be useful and well facilitated. The meetings cover key labor rights topics, responsible recruiting practices, and other relevant issues.	The attendance is low and inconsistent. To date, the project organized six meetings. Of 54 persons who attended at least 1 meeting, only 7 attended 3 or more meetings. No one attended more than four times. Pilot companies and recruiters only attended one meeting. During interviews, company and agency representatives

<sup>31</sup> According to the April 2021 project stakeholders including TPR, in March 2021, the project distributed 77 PPE sets to recruitment agencies, Thai Frozen Food Association, and FAIR Fish contracted staff.

<sup>32</sup> <https://ourworldindata.org/coronavirus/country/thailand>

<sup>33</sup> <https://www.worldometers.info/coronavirus/country/thailand/>

Intervention	Strengths	Weaknesses
in responsible recruiting practices.		explained that they did not attend more meetings because they had to attend to company business and priorities.
Key project technical reports, such as parts of the pre-situational assessment (technical brief), promising practices report, mapping of migrant routes.	According to the seafood associations and some migrant NGOs the project's key technical reports are conceptually sound and informative. They contain information based on research and accurately reflect migrant recruitment issues.	The primary strategy to disseminate the technical reports is uploading on the project's Facebook page and website. Based on a review of these sites, it appears that few people are reviewing and commenting on the reports.
Technical assistance and coaching to pilot companies and recruiting agencies on responsible recruiting practices, including national and international laws, regulations, and standards.	The companies and recruiting agencies believe the technical assistance and coaching has been effective because TFS provided valuable information on international standards required by many international buyers.	According to TFS and project staff, the participation of the designated representatives from pilot companies and recruiting agencies in the technical assistance sessions frequently changed due to heavy workloads. This meant that TFS had to orient the new participants before continuing with the technical assistance session and coaching.
Responsible recruiting model (RRM) for pilot companies and recruiting agencies.	The RRM is built on Thai laws and international standards such as BSCI, ILO's GLP (Good Labor Practices), and ILO and UN conventions. The RRM was developed with participation of the pilot companies and input from the recruiting agencies. According to pilot company and recruiting agency representatives, their participation helped create a deep understanding of the international standards and ownership of the RRM.	Parts of the RRM that focus on migrant workers are not relevant to Marine Fine Food because the company does not recruit migrant workers. Rayong Fish Sauce does not intend to implement some parts of the RRM, such as limits on overtime hours, because it is not feasible. <sup>34</sup> While comprehensive, the RRM consists of 45 pages of core content and more than 300 pages of annexes and could overwhelm small companies.
Pilot company and recruiting agency recruiting policies and procedures.	Like the RRM, the policies and procedures are built on Thai laws and international standards such as BSCI, GLP, and ILO and UN conventions. According to TFS and	Like the RRM, pilot company and recruiting agency representatives believe that some policies and procedures are difficult to implement. It is highly likely that the pilot companies and recruiters will

<sup>34</sup> According to Rayong Fish Sauce, migrant workers request as many overtime hours as possible to earn more money and if the company is trying to fill orders, it provides the overtime hours.

Intervention	Strengths	Weaknesses
	confirmed by the pilot companies and recruiting agencies, the policies and procedures were developed with their active participation.	pick and choose those policies and procedures most feasible to implement.
Internal recruitment monitoring system to track implementation of the pilot recruitment agencies' policies	The recruitment monitoring systems are very complete, and are based on international standards (ILO, BSCI) and Thai Labor Law and designed to meet ISO requirements. Furthermore, recruiting agency staff members were coached online using simulations and role-playing that they believe was effective at increasing their understand and knowledge of the systems.	While the monitoring systems are quite thorough and meet international standards and ISO requirements, recruiting agency representatives explained that they are difficult to implement given the agencies' lack of experience with social management systems and financial and human resource constraints. TFS confirmed this view as well.
Responsible recruiting training for recruiters in Myanmar and Cambodia who recruit migrant workers specifically for Thailand.	The project contracted one consulting firm to develop training course content and another to place the content in an online format. The course will be tested with 45 participants from Myanmar, Cambodia, and Thailand. Based on the experience from the testing phase, the project will launch online for a broader audience of recruiters.	It is too early to assess any weaknesses with the online responsible recruiter course because it has not been implemented. However, some staff members expressed concern that the course is developed and tested in English, which could limit the ability of recruiters in Myanmar and Cambodia to effectively participate and test the course content. <sup>35</sup>
Cost benefit analysis (CBA) to make a business case for why seafood processors should invest in responsible recruiting practices.	The CBA approach and tools are conceptually sound. They potentially can be used by companies to calculate the benefits of investing in responsible recruiting practices. <sup>36</sup>	While the CBA approach and tools are conceptually sound, the evaluation team questions whether the project/companies will be able to conduct a meaningful CBA. Only one pilot company plans to recruit migrant workers (8 to 10), which makes a very small sample to draw data to show return on investment, savings from

<sup>35</sup> To simplify the testing process, the project initially intended to test the online course in English version so it could have the final draft in one language before translating it into other languages. At the time the evaluation report was being finalized, the project reported that it intended to launch and pilot the online course in Thai, Burmese, and Khmer languages.

<sup>36</sup> The evaluator feels qualified to comment on the CBA because he studied CBA techniques as part of his MBA program at Georgia State University. He also applied CBA in his company's work with private sector interests looking at making investments in social programs (i.e., HIV-AIDS prevention and treatment).

Intervention	Strengths	Weaknesses
		turnover and absenteeism, and so forth. <sup>37</sup> In addition, interviews with pilot companies and recruiting agencies suggest that access to international markets is the more compelling business case for SMEs to adopt responsible recruiting practices.
Communication packages to promote responsible recruitment practices.	The communication packages are under development and will likely include a booklet summarizing the pilot model (printed and online versions) and provide basic information about the importance of responsible recruiting; a link to the full RRM manual; and social media content such as infographics and interviews with pilot company managers about their experience. This work is in progress.	Because the communication package has not been developed and disseminated, weaknesses have not been identified. <sup>38</sup>
Engagement with key players including seafood processing companies, business associations, and recruiting agencies.	The project recently developed a government engagement concept note. The strategy is well constructed and should provide a useful foundation to develop a more complete engagement strategy to work with the MOL on responsible recruitment practices.	While the project has a thoughtful engagement concept note for the government, the concept note lacks the detail of a complete engagement strategy. Furthermore, the project does not have engagement strategies for other key stakeholders that could help it promote responsible recruiting practices under Outcome 4. These stakeholders include seafood processing associations, other business associations, recruiter associations, and key international organizations.

**Project Management**

The project’s initial management structure consisted of five staff members: project director, monitoring and evaluation (M&E) officer, two business engagement officers (BEO), and a finance and grant administration officer. The project management team underestimated the time required

<sup>37</sup> The evaluator spoke with the consultants who developed the CBA approach and tools. While they agree a larger sample would be preferable, they believe a CBA can be conducted if approached as a pilot case study for Rayong Fish Sauce using a mix and match approach of tools/indicators presented in the CBA.

<sup>38</sup> The challenge facing the project is to develop a communication package that is not overly complicated and that lays out a compelling reason for why companies should pursue responsible recruitment practices. This is consistent with comments made by pilot company and recruiting agencies during interviews.

to manage and report to USDOL on finance and implementation issues, which decreased the amount of time the project director had available to provide technical oversight.

The project took advantage of early resignations of the finance and grant administration and one BEO to restructure. The finance and grant officer positions were split into two positions: finance officer and grant administrative assistant. Due to the large number of communication activities under Outcomes 1 and 4, the project decided to convert the BEO position into a communication and development officer position. Project staff members believe the current management structure is appropriate and adequate to manage the project.

Other management aspects appear to function effectively. Project staff members are satisfied with the supervision they receive. They are also satisfied with the support they receive from Plan International USA and USDOL. Likewise, Plan and USDOL are satisfied with the quality and timeliness of information sharing and overall communication.

One concern that surfaced during interviews with the project staff is whether they have adequate skills and understanding to revise the RRM manual. The project intends to solicit comments and suggestions from key stakeholders to improve the manual. Project staff members are concerned that they do not have adequate experience with social management systems and international recruiting standards to lead the manual revision process. One staff member told the evaluation team that the staff would be more comfortable if the project could contract an expert consultant to help with the revision process.

#### **3.2.4. Effectiveness of the Project's Monitoring and Evaluation System**

The project's M&E system is essentially the CMEP that the project developed during a workshop conducted in June 2019 and published in October 2019. According to project staff members, the CMEP process helped the staff develop a strong and logical project design and theory of change, effective and appropriate indicators, data collection tools, and a data collection and reporting plan.

During interviews, project staff members noted that the CMEP calls for learning sessions, which are helpful to discuss whether the project is on track and if not, why. Project staff members commented that the learning sessions help them monitor progress and make decisions about how to make the necessary adjustments. Project staff members also periodically review the results framework to determine whether it is still valid and make adjustments if required. For example, the project, with USDOL approval, decided to change the methodology to measure the Outcome 1 indicator (*percentage change in the level of understanding of the nature of forced and human trafficking in the recruitment of workers*) from pre- and post-tests to self-assessments to more accurately measure the outcome. The project also changed Output 1.3 from *promising practices in responsible recruitment documented* to *responsible recruitment-related reports documented and disseminated* so three key research reports could contribute to the achievement of Outcome 1.

The project intends to conduct a data quality assessment using the USDOL Routine Data Quality Assessment (RDQA) tool. The project's M&E officer explained that while she has not yet conducted a formal data quality assessment, she used the RDQA tool to review each deliverable provided by TFS under its sub-contract. She commented that the RDQA tool was useful to identify issues and provide comments to TFS.

The analysis of the TOC in Section 3.1 noted several weaknesses with indicators for the project document and Outcome 1:

- The indicator for the project document, *level of compliance of two pilot companies with international standards for responsible recruitment*, is inadequate to measure the objective because the indicator only measures the level of compliance with international standards for two pilot companies that only employ 52 migrant workers. In addition, the indicator does not capture the effect of Outcome 4, which is to *promote responsible recruiting practices so seafood processing companies and recruiting agencies adopt them*.
- The indicator for Outcome 1 does not capture key outputs and activities such as dissemination of IEC materials and technical reports as well as messages delivered by the responsible recruiting app. Also, the indicator for Output 1.1.1, *number of times forced labor and human trafficking messages are delivered*, will likely need adjusting after the communication strategy has been revised and target audiences and delivery channels are defined.

Another indicator issue that deserves discussion is how the core responsible recruiting policies and procedures for pilot companies and recruiting agencies are conceived and counted. Outcome 2 does not include an output indicator to measure the number of policies and procedures that the pilot companies develop. Currently, the development of policies and procedures are captured under piloting the RRM (OPT 2.2.1). We believe it would be useful to add an indicator that counts the number of policies and procedures that the pilot companies develop.

Outcome 3 includes two output indicators that counts the policies and procedures that the pilot recruiting agencies revise (OPT 3.2.1) or develop (OPT 3.2.2). The project counts the policies and procedures once even though each recruiting agency developed its own set of policies and procedures and are implementing them differently. In hindsight, the evaluation team believes that when the indicators were developed, it would have been more accurate to write the indicators to count the total number of policies and procedures revised or developed. For example, instead of an end of project (EOP) target of 2 policies and procedures revised (OPT 3.2.1) and 7 policies and procedures developed (OPT 3.2.2) for the 4 recruiting agencies, OPT 3.2.1 might have been established as 8 (2 revised policies and procedures x 4 agencies) and OPT 3.2.2 as 28 (7 new policies and procedures x 4 agencies).

Regarding the indicators for Output 3.2, the project assumed it would revise 2 policies and procedures of the pilot recruiting agencies (OPT 3.2.1) and develop 7 new policies and procedures (OPT 3.2.2). In reality, the project did not revise policies but had to develop nine new policies and procedures for each recruiting agency. Since the project did not revise policies and procedures (OPT 3.2.1.), this indicator is no longer relevant. In the April 2021 TPR, the project reported that it combined the revision of policies and procedures with the development of new policies and procedures (OPT 3.2.2.) to arrive at a new EOP target for OPT 3.2.2 of 9.

### 3.2.5. Effectiveness of Child Safeguarding Gender Mainstreaming

During interviews, project staff made the point that while child safeguarding is important to Plan, it did not entirely apply to the FAIR Fish project because the legal working age in Thailand is 18 years and above. The Thai and migrant workers in the seafood processing companies are all at

least 18 years of age. On the other hand, gender, which is also an important concept for Plan, has been addressed in various ways by the project.

It should be noted that USDOL did not specifically request that gender be addressed or mainstreamed into project activities. However, given the importance of gender to Plan, it worked with the FAIR Fish project to help ensure gender mainstreaming as summarized below.

- Plan International USA sent its gender specialist to provide an orientation and technical assistance to the project staff and TFS on gender sensitivity and how the project might address gender in migrant recruiting processes.
- TFS ensured that gender was included as one of the policies and procedures for both pilot companies and recruiting agencies. Gender sensitivity (including discriminatory practices against female migrant workers) is also incorporated throughout the responsible recruiting manual. Finally, TFS also included gender sensitivity during the technical assistance and coaching sessions it conducted with pilot companies and recruiting agencies. The pilot companies and recruiting agencies used the gender sensitivity information to develop specific policies and procedures on gender.
- Where appropriate, the project disaggregates and reports by gender such as trainings, technical assistance or coaching sessions, and quarterly information sharing and learning meetings.

The concrete actions to mainstream gender into project activities supported by interviews with seafood processing companies, recruiting agencies, Plan International USA, and the FAIR Fish project, the evaluator believes gender has been effectively mainstreamed into project activities.

### **3.3. Efficiency**

This section answers the following evaluation question:

13. Were the project activities efficient in terms of financial and human resources in relation to its results and outputs? What factors, if any, facilitated (i.e., strong collaboration with pilot companies) or hindered (i.e., delays in implementing activities and COVID-19) efficiency?

To assess efficiency, the evaluation teams analyzed expenditure rates and allocation of human and financial resources. Factors affecting efficiency are also discussed in this section.

#### **3.3.1. Expenditure Analysis**

Exhibit 11 shows the project's expenditure rates for Plan International USA, Plan Thailand (FAIR Fish project), the four outcomes, subgrants, M&E, and indirect costs. The expenditures include actual expenditures and projections through January, 2021.

The Plan International USA and Plan Thailand line items include salaries, fringe benefits, travel and transportation, and office expenses and supplies (Plan Thailand only). The four outcome line items are the amounts allocated to achieving the outcomes including country level activities. Subgrants include amounts allocated to TFS to produce deliverables under Outcomes 2 and 3. The M&E line item includes the M&E consultant fees, travel, and evaluation costs.

In addition, USDOL approved an allocation of \$116,500 to a new output under Outcome 4 to respond to COVID-19 by producing multimedia products for communication and advocacy, personal protective equipment, and infrared thermometers. The \$116,500 came from the Plan Thailand budget (personnel, fringe, office supplies, and Outcomes 1 and 3).

#### **Exhibit 10. Expenditure Rates**

Line Item	Budget	Expenditures	Percent
Plan International USA	536,515	232,195	43%
Plan Thailand (FAIR Fish)	1,194,167	429,447	36%
Outcome 1	124,009	22,433	18%
Outcome 2	20,000	0	0%
Outcome 3	206,873	2,411	1%
Outcome 4	249,932	30,596	12%
Subgrants	472,328	228,371	48%
M&E	273,099	108,149	40%
Indirect	923,077	323,351	35%
<b>Total</b>	<b>4,000,000</b>	<b>1,376,953</b>	<b>34%</b>

The life of the project is 48 months (January 1, 2019 to December 31, 2022). The project has spent 34 percent of its total budget over a 27-month period, or about 56 percent of the project’s life of 48 months. The project is underspent by approximately 22 percent. While all line items are underspent, the four outcome line items are underspent by nearly 90 percent.

Much of the underspending can be explained by delays, which are discussed in detail below under Section 3.3.3.

#### **3.3.2. Allocation of Project Resources**

Exhibit 12 shows the allocation of budgetary resources to Plan International USA, Plan Thailand, the four outcomes, and the subgrants line item. Approximately 13 percent of resources are allocated to Plan International USA to provide support while another 23 percent consists of Plan International USA’s indirect costs. The remaining 64 percent of budget resources are allocated to Plan Thailand to implement the FAIR Fish project.

#### **Exhibit 11. Allocation of Resources by Outcome and Country**

Operating Item	Amount	Percent
Plan International USA	536,515	13%
Plan Thailand (FAIR Fish)	1,194,167	30%
Outcome 1	124,009	3%
Outcome 2	20,000	1%
Outcome 3	206,873	5%
Outcome 4	249,932	6%

Operating Item	Amount	Percent
Subgrants	472,328	12%
M&E	273,099	7%
Indirect <sup>39</sup>	923,077	23%
<b>Total</b>	<b>4,000,000</b>	<b>100%</b>

As discussed previously, the Plan Thailand FAIR Fish line item consists of salaries, fringe benefits, travel and transportation, and office expenses and supplies, accounting for 30 percent of the budget. The four outcomes and the subgrant to TFS to produce key deliverables for Outcomes 2 and 3 account for 27 percent of the budget. The M&E line item comprises the remaining 7 percent. In general, the allocation of budget resources to achieve the outcomes appears reasonable. It is especially important to note that 64 percent of the resources are allocated to Plan Thailand to implement the project. During interviews, Plan International USA and Fair Fish project staff commented that the allocation of resources is adequate to achieve the outcomes and outputs.

### 3.3.3. Factors Affecting Project Efficiency

Overall, the project is operating in an efficient manner. It has produced outputs and achieved outcomes with the planned amount of human and financial resources. However, there have been events that have created both efficiencies and inefficiencies, summarized below.

**COVID-19.** COVID-19 is the one factor that has had the most impact on project efficiency. On one hand, the decision to move all face-to-face encounters such as training, coaching, and meetings to online formats created efficiencies. For example, conducting the quarterly information sharing and learning meetings in an online format created efficiencies because participants avoided considerable time spent traveling to the meetings. Moving events to an online format also generated cost savings from not having to rent meeting venues and pay travel and per diem expenses.

On the other hand, COVID-19 caused delays and created inefficiencies. For example, the reflection workshop planned for pilot companies in a hotel in Rayong province was delayed because the Rayong Fish Sauce requested that the meeting be rescheduled and changed from a face-to-face encounter to an online format to protect its staff from COVID-19 infection.

At the onset of the COVID-19 pandemic in Thailand, Plan developed a concept note describing how the FAIR Fish project might work with its pilot companies to help protect workers. The concept note served as a point of discussion to modify the project's RF to include activities and outputs that addressed COVID-19. As a result, the project developed a new output (Output 4.4) with actions to mitigate the impact of COVID-19 on workers and their families including COVID-19 education and distribution of face masks, hand sanitizers, and thermometers. While these were important measures to help mitigate the impact of COVID-19 on workers and their families, the measures diverted the project away from other planned activities and outputs and caused delays. In interviews with project staff responsible for communications, they noted that the process of

<sup>39</sup> While the Plan USA indirect cost is 23 percent of the total budget, its indirect rate is 30 percent.

developing COVID-19 IEC materials meant that they had to temporarily suspend work on the project's communication strategy and related activities.

**Developing and Approving the Key Practices Report.** Developing the report took approximately 4 months, from September 2019 to January 2020. The revisions and final approval took 9 months including more than five iterations between January 2020 and October 2020. While the project planned to hire expert consultants to develop the report, it ended up relying on its two BEOs. While the BEOs had some experience with migration issues and social compliance standards, in hindsight they lacked experience, including an adequate level of English, required to lead the initiative. According to staff members, the lack of experience contributed to many rounds of revisions between the BEOs and Plan International USA. Staff members noted that an expert consultant could have worked with the BEOs to provide the necessary technical oversight in developing the report.

**Development of the RRM.** Development and approval of the RRM took nearly a year. TFS submitted the first draft of the RRM in November 2019. The final draft of the RRM was eventually approved in October 2020. During the RRM review process, TFS developed and submitted three drafts that consisted of numerous iterations to address Plan's comments. TFS and Plan have different opinions for why it took so long to develop the RRM. TFS commented that Plan did not provide clarity on what was expected. For example, TFS opined that Plan did not know what kind of model it wanted TFS to develop and was not familiar with responsible recruitment processes for the seafood supply chain that, together with slow revision and response times, contributed to delays. On the other hand, Plan noted that the various rounds of comments that delayed the RRM occurred because TFS struggled to present the RRM content in a clear, concise, and easy-to-digest manner.

**Development of the Responsible Recruiting App.** The delay in developing the responsible recruiting app, which has taken nearly a year, caused inefficiency. The contract was issued in August 2020 and the contractor is expected to finish the app in August 2021. As explained in Section 3.2.2, the delays were caused by a misunderstanding of how the technology was to be developed in the RFP and contract.

**Identification of Pilot Recruiting Agencies.** The activities and outputs under Outcome 3 were delayed several months because the project experienced difficulty identifying recruiting agencies to participate. To identify recruitment agencies, the project contacted 5 recruitment associations and nearly 200 recruitment agencies between February and March 2020. Eventually, the project identified four recruitment agencies interested in participating and signed the memorandums of understanding (MOU) with these agencies in April, June, and July 2020.

**Development of the Communication for Development Strategy.** The development of the project's communication strategy has been delayed by nearly a year and a half. The project contracted a consulting firm to develop the communication strategy in December 2019. The consulting firm conducted a workshop in January 2020 for key stakeholders to help define target audiences and messages. Due to a lack of input from the stakeholders, the target audiences were not identified, and messages were not developed. Instead, the consultants prepared a report with guidance and suggestions for the project team to design a communication strategy. The report was submitted in April 2020 and finalized in June 2020. Because, according to Plan International USA

staff, the communication guide was not what the project expected, the project’s communication officer has received responsibility to finalize the communication strategy, which was in the development process at the time of this interim evaluation.<sup>40</sup>The evaluator concurs that the communication guide submitted in June 2020 provides a guidelines and tips to develop a communication strategy but falls short of a strategy because it does not include the specific details such as objectives, target audiences, messages, and channels.

**Distribution of COVID-19 Materials.** Plan developed the COVID-19 response concept note in April 2020. While the project purchased PPE such as masks and hand sanitizers in August 2020, the PPE have not been distributed to workers and their families because the project intended to include COVID-19 IEC materials such as booklets and posters. Production of the IEC materials was not completed until the end of March 2021, nearly 6 months after the purchase of the PPE. The delay can largely be attributed to a complex and lengthy production and approval process.

At the time of the interim evaluation, distribution of the IEC messages and PPE to workers and their families was placed on hold again because Plan Thailand required its staff to work from home to protect them from a third wave of COVID-19.<sup>41</sup>

### **3.4. Sustainability**

The following section examines the project’s sustainability strategy as well as the sustainability of key outputs and outcome, which respond to the following evaluation questions:

1. Has the project developed a detailed sustainability plan and exit strategy? What steps have been taken to implement the plan and what additional steps might the project take?
2. To what extent are the project’s plans for sustainability adapted to the local level, national level, and capacity of implementing partners?
3. Are there any factors that are likely to limit or facilitate the technical or financial sustainability of project results?

#### **3.4.1. Sustainability Plan and Exit Strategy**

The project’s sustainability plan was developed and submitted to USDOL in March 2019. The sustainability plan consists of four exit strategies that could lead to continuous reduction of forced labor and human trafficking in the recruitment of women and men in Thailand’s seafood processing sector. The exit strategies correspond to the project’s four outcomes. Specifically, the project aims to sustain:

- Understanding among seafood processing companies, recruiters, workers, and other stakeholders such as international seafood retailers and consumers about forced labor and human trafficking.
- Action on responsible recruitment by SMEs in the Thai seafood processing sector.

<sup>40</sup> The project communication officer is collecting data on attitudes and practices of target audiences (migrants, SMEs and recruiters) to design key messages and communication channels that is part of the target audience analysis.

<sup>41</sup> <https://www.reuters.com/world/asia-pacific/thailand-reports-2438-coronavirus-cases-daily-record-11-deaths-2021-04-25/>

- Compliance by SMEs, recruitment agencies, and labor brokers in the recruitment chains.
- Promotion of responsible recruitment practices among private sector actors.

The sustainability plan is anchored in the project’s strategy to convince a significant number of small and medium sized seafood processors and recruiting agencies to adopt and implement the RRM and its principles that were developed under Outcomes 2 and 3. To help convince seafood processors and recruiters to adopt and implement the RRM, the project plans to develop and communicate a compelling business case for why companies should adopt the model, which is one of the primary activities under Outcome 4.

The sustainability plan is a concise three-page document that provides short descriptions of the four exit strategies and how they are intended to ultimately sustain the impact on human trafficking and forced labor. However, the sustainability plan does not rise to the level of a detailed plan that describes which outputs and outcomes will be sustained, actions the project should take to sustain them, required resources and capacities, benchmarks, and who is responsible. A detailed sustainability plan might also examine the appropriateness of the exit strategies to the context and capacity of small and medium sized seafood processors and recruiting agencies and their resources. With nearly 2 years remaining in the life of the project, the project would benefit from a more detailed sustainability plan that would serve as a roadmap. Since the current sustainability plan lacks implementation detail, it was not possible for the evaluation team to assess the steps the project has taken to implement the plan.

### **3.4.2. Adapting to Local and National Levels and Implementer Capacities**

In general, the sustainability plan is adapted to local and national levels. However, it is not clear, based on comments from the pilot companies, recruiting agencies, seafood processing associations, and migrant NGOs whether seafood processing SMEs have the ability and resources to implement the RRM, which is key to the sustainability plan (see text box). Stakeholders told the evaluation team that seafood processing SMEs require a simple responsible recruiting “roadmap” to follow along with strong incentives such as the possibility of accessing new international markets.

The question is whether SMEs can implement the model. SMEs may not understand the model and why we need it. In my supply chain we have smaller companies, and they might not see the need for the model. Also, SMEs have a high workload and not many resources to implement the model. This will be difficult.

*Pilot Recruiting Agency Representative*

### 3.4.3. Factors Affecting Sustainability

#### Relevancy and Feasibility of the Policies and Procedures.

TFS worked with the pilot companies and recruiting agencies to develop core policies and procedures on responsible recruiting. The extent to which the policies are relevant and feasible to the companies and recruiting agencies will help determine whether they are sustained after the project ends. For example, because Marine Fresh Foods does not recruit migrant workers, several policies such as anti-trafficking in persons, forced labor, and responsible recruitment are not relevant. The other policies, however, can apply to its Thai workforce. Rayong Fish Sauce does not intend to fully implement some policies such as overtime pay because it is not feasible.

#### FAIR Fish Core Policies

1. Anti-Trafficking in Persons
2. No Forced/Bonded Labour
3. Non-Discrimination
4. No Child Labour
5. Freedom of Association
6. Responsible Recruitment
7. Decent Work Principles
8. Grievance and Remediation
9. Business Ethics (recruiters only)

**Capacity and Resources.** The continued implementation of the RRM including the policies and procedures as well as the recruitment agency social compliance monitoring system depends on the capacity of these organizations and their human and financial resources. During interviews, pilot company and recruiting agency representatives said while they are committed to implementing responsible recruiting practices, the availability of human and financial resources would determine the extent to which they will implement the model and its policies. These representatives made the point that their companies are small and remaining financially viable is the priority. The recruitment agency representatives noted that full implementation of the social compliance monitoring system would be difficult due to competing demands on staff time and required resources. TFS also notes in its reports that recruiting agency staff capacity to understand social compliance monitoring remains a huge challenge.

Yes, we would be interested in promoting the model and tools. However, issues beyond Thai laws would depend on each individual company. A lot depends on how difficult the model is. We have a capability gap. The model needs to be simple and easy to use. Also, the model should have international recognition like GLP. So, companies don't really know the benefit, the project must show the business case like growing markets.

*Seafood Processing Association*

**Compelling Business Case.** The stakeholders interviewed for the evaluation were unanimous in their opinion that seafood processing SMEs need to see a strong business reason for using scarce resources to invest in implementing responsible recruiting practices as promoted by the FAIR Fish project. The most compelling business reason given by the stakeholders was increasing access to international markets and selling more product to international buyers. When asked about other benefits such as reduced absenteeism and turnover that the CBA intends to calculate, these stakeholders opined that while most SMEs would

be interested, they would be more motivated to adopt responsible recruiting practices if they led to more international business.

**Clear, Simple, and Practical Responsible Recruiting Roadmap.** The RRM manual consists of 32 core pages and 368 pages of annexes, mostly tools and guides. During interviews, project staff expressed concerns that the model is overly complex and difficult to understand for SMEs. The evaluation team specifically asked the pilot company and recruiting agency representatives about

the model’s complexity. They noted that because they helped develop the model and were familiar with its contents, they did not believe it was overly complex and difficult to understand. However, they did acknowledge that it could be seen as complex for someone who had not been involved in its development. As noted in the text box, the extent to which the project is able to provide a clear, simple, and practical roadmap to seafood processing SMEs and recruiting agencies during the promotion phase under Outcome 4, the chances of its adoption and implementation will increase.

**Engagement of Key Actors.** The engagement and eventual support of key actors such as the government, seafood processing associations, other business associations, recruiting associations, and international organizations will be critical in promoting and eventually sustaining the responsible recruitment model. The project recently developed an engagement concept note for the government, specifically the MOL. The project also met with MOL representatives to discuss the project and request support to promote the model (see text box). In an interview with one MOL representative, she said that in addition to helping the project promote the model, the MOL can help sustain it by incorporating it in MOL policies and procedures.

Once the model is finished, the MOL will help promote it. We work with the ILO to promote GLP so we can do the same with FAIR Fish because the two models complement each other. Also, there are many relevant government agencies that are in the space so we can help organize and help the project reach out to them.

*Ministry of Labor*

In addition, the project developed a concept note during the interim evaluation that briefly describes how it intends to engage with SME seafood importers in the US and link them to SME seafood exporters in Thailand.<sup>42</sup> These concept notes provide a solid foundation to develop more detailed engagement strategies. The project would benefit from having detailed engagement strategies for the other key actors that can help the project sustain key outcomes and outputs.

**Plan’s “YES! Academy.** Plan intends to use its Youth Employment Solutions Digital Ecosystem YES! Academy, to host the online recruiter training course, making it available after the project ends. The YES! Academy is the open and free online platform where youth can access the courses.<sup>43</sup> While the primary audience of the YES! Academy is young people from marginalized backgrounds, recruiters and other interested stakeholders will be able to access the responsible recruiting course through YES! Academy after the project ends. According to Plan International USA, making the responsible recruiting course available on the YES! Academy platform will ensure it is available to recruiters and other interested stakeholders once the project ends.

<sup>42</sup> The concept note entitled “The FAIR Fish Project’s Plan to Engage US-based SME Importers of Thai Seafood-related Products” was submitted to USDOL on April 23, 2021. USDOL reviewed and discussed the concept note with the project. According to a USDOL representative, while notionally supportive, USDOL has not approved the concept note/strategy. USDOL provided guidance for a revision including the point that the strategy should not only focus on US-based SME importers.

<sup>43</sup> <https://plan-international.org/eu/yes-digital-ecosystem>

## 4. Conclusions

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The evaluation team's conclusions, based on the findings, are organized according to the evaluation's main categories: relevance, effectiveness of strategies and interventions, efficiency, and sustainability.

### 4.1. Relevance

**The project's design and theory of change remain relevant and appropriate to combat forced labor and human trafficking.** However, after 2 years of implementation several factors have surfaced that threaten the TOC logic. One pilot company does not employ migrant workers while the other pilot company employs very few migrant workers. The pilot recruiting agencies do not have a relationship with the seafood processors as envisioned in the project design and do not consistently recruit migrant workers for the seafood sector. One recruiting agency went out of business and another had suspended operations and will likely close its business as the evaluation report was being written. Furthermore, the project does not have strategies in place to solicit the support of key national and international actors that could help the project promote the RRM. These actors include seafood associations such as the Thai Tuna Industries Association and the Thai Frozen Foods Association, business associations, civil society organizations and international organizations working on migrant issues in the seafood process sector such as the Migrant Working Group, Migrant Workers Rights Network, International Labour Organization, and the International Organization for Migration. During interviews, the representatives from these organizations told the evaluation team that they would be willing to help promote the RRM to key factors in their networks.

**The project's strategies are relevant to the needs of key stakeholders in the seafood processing sector.** While the strategies remain relevant, there has been a consolidation in the seafood processing sectors, and many SMEs have gone out of business while others struggle to stay in business. Larger companies have absorbed SME workers. The consolidation begs the question whether the project should broaden its targets to include larger seafood processing companies that specifically export to international markets and whose migrant workers are at risk for labor rights violations. The evaluation team believes that the consolidation of the seafood processing sector means that large companies and their supply chains are at risk for migrant labor rights violations including forced labor and human trafficking. The evaluation team also believes that broadening the target to include larger seafood processing companies can help the project leverage resources that are more likely available in the larger seafood processing companies and their supply chains.

**The project integrated relevant Thai labor laws and regulations as well as international labor standards in project activities.** The project used relevant Thai labor laws and regulations as well as international labor standards to develop the RRM, its tools, and the policies and procedures for pilot seafood processing companies and recruiting agencies. These laws, regulations, and standards are prominent in the model and policies. In addition, the project used Thai labor laws and international standards to train and coach the pilot companies and recruiting agencies.

## 4.2. Effectiveness

**While the project has made progress in achieving certain key outcomes and outputs, it has made less progress achieving others due primarily to delays caused by the COVID-19 pandemic and completion of key deliverables.** The work with the two pilot companies under Outcome 2 is complete. The project provided technical assistance and worked closely with the companies to develop the RRM including a core set of eight responsible recruiting policies and procedures. The work with the four recruiting agencies is also complete. The project provided coaching sessions to the agencies to help them develop and understand a set of nine responsible recruiting policies and procedures. The one output under Outcome 3 not achieved yet is online training for recruiters in Thailand, Myanmar, and Cambodia. The performance of Outcome 1 is low because the communication strategy has been delayed. Outcome 4, which depends on outputs produced under Outcomes 2 and 3 (RRM, policies and procedures), has also been delayed due to delays in finalizing Outcome 2 and 3 outputs.

Because the project was just beginning to implement activities under Outcome 4 at the time of the interim evaluation, little progress has been made achieving indicator targets. Output 4.4, which intends to provide PPE and IEC materials to protect workers and their families against infection, has been delayed nearly a year due to a complicated and prolonged materials development and approval process. The project started to distribute PPE to workers on April 9, 2021.

**The project has encountered factors that both facilitated and hindered achievement of outcomes.** The first factor is the COVID-19 pandemic. On the facilitating side, the border closures to mitigate the spread of COVID-19 halted recruitment of migrant workers that, in turn, allowed recruiting agencies to participate in the project at a level that may not have been possible if they were fully engaged in recruiting workers. On the hindering side, the border closings have meant that the pilot companies and recruiting agencies have not been able to recruit migrant workers and, consequently, fully implement and test the RRM and policies and procedures.

The second factor is the selection of the two pilot seafood processing companies and four recruiting agencies. The project's decision to invite two seafood processing companies, which Plan Thailand worked with in the SEAS project and engaged them in a constructive manner, built trust and facilitated project implementation. On the other hand, these 2 companies hindered implementation because 1 company does not employ migrant workers and the other only employs 52 with plans to recruit only 8 to 10 more migrant workers, making it difficult to test the RRM. While the project finally identified four recruiting agencies to participate, these agencies do not specifically recruit migrant workers for the seafood processing sector.

**While overall the project's interventions are effective, there are a few exceptions.** The exceptions include the following:

- The attendance of the quarterly information sharing and learning meetings is low and inconsistent.
- The pilot companies and recruiting agencies do not intend to implement parts of the RRM that they believe are either not relevant or not feasible.
- The social compliance monitoring systems are difficult for recruiting agencies to implement given their lack of experience with social management systems and financial and human resource constraints

- The project does not have engagement strategies for key stakeholders (other than the government) that could help it promote responsible recruiting practices.

**The project's management systems are effective.** Initially, the project underestimated the level of staffing required to provide financial and grant reporting. The project adjusted its management structure to include a finance officer and a grants administration officer. It also incorporated a communications officer to oversee the communication strategy. In addition, the project's supervisory and reporting systems are adequate.

**The CMEP is effectively used to monitor achievement of key indicators and to make decisions regarding implementation; but, it requires updating.** The project staff uses periodic learning sessions to discuss whether the project is on track and to make the necessary adjustments. The project has not yet conducted a data quality review using the USDOL RDQA tool. However, it has used the RDQA to assess the quality of the deliverables provided by TFS under its contract. Indicators for the project objective and Outcome 1 require adjustments.

**The project has effectively mainstreamed gender into project activities.** Although USDOL did not specifically request that gender be addressed or mainstreamed into project activities, several important steps were taken to mainstream gender into the project. For example, Plan sent a gender specialist to Thailand to orient project staff and TFS on gender mainstreaming. TFS incorporated gender issues in the RRM and policies and procedures and provided technical assistance and coaching on how to incorporate gender. The project's communication activities include gender sensitive messages (i.e., discrimination against female migrant workers).

#### **4.3. Efficiency**

**Overall, the project operated in an efficient manner. The financial and human resources appear to be adequately allocated to achieve the outputs.** However, the project is underspent by 21 percent while the specific outcome line items are underspent by about 90 percent. The underspending can be explained by savings realized by shifting face-to-face training and meetings to an online format to avoid group gatherings and a range of delays (i.e., contractual problems implementing the responsible recruiting app, difficulty identifying recruitment agencies, completion and approval of key documents). While the project has a plan to accelerate spending, it appears that it is unlikely that all funds in the grant award will be expended by the time the project is scheduled to end on December 31, 2022.

#### **4.4. Sustainability**

**Although the project has a brief three-page sustainability strategy, it does not have a detailed sustainability plan.** The current sustainability strategy does not rise to the level of a detailed plan. A detailed sustainability plan should describe what will be sustained, actions the project should take to sustain them, required resources and capacities, timeframes and benchmarks, and who is responsible.

**The current sustainability strategy is adapted to the local and national levels but may exceed the capacity and resources of seafood processing companies and recruiting agencies to implement.** One of the characteristics of small to medium sized seafood processing companies and recruiting agencies is limited human and financial resources and thin profit margins. These

SMEs have limited resources to invest in responsible recruiting practices and are likely not to make these investments if they do not see a clear business benefit. A detailed sustainability plan, noted above, should also assess the appropriateness the capacity and resources that small and medium sized seafood processors and recruiting agencies possess to effectively sustain key outputs and outcomes.

**There are several factors that are likely to either limit or facilitate the technical and financial sustainability of project results.** SME seafood processing companies and recruiting agencies have limited resources to invest in responsible recruiting practices and need to see a compelling business case to do so. Furthermore, they need a simple and practical process to implement responsible recruiting practices. Finally, the project needs to enlist the support of the government and other key actors such as seafood processing associations, other business associations, NGOs, and international organizations to promote the RRM and eventually convince seafood processing companies and recruiting agencies to implement the model.

## 5. Lessons Learned and Good Practices

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Based on the findings and conclusions, this section lists and discusses lessons learned and good practices that could benefit similar projects. These lessons and good practices are based on experiences realized after nearly 2 years of implementation. Some lessons and good practices will continue to evolve while others will emerge over the next 2 years.

### 5.1. Lessons Learned

**To have the intended impact on forced labor and human trafficking in the seafood processing sector, it is important to work with seafood processing companies that employ significant numbers of migrant workers and with recruiting agencies that recruit migrant workers for companies in the seafood processing sector.** The project decided to work with two seafood processing companies that Plan worked with in a previous project because Plan had established a trusting relationship with the companies, which allowed the project to begin implementing activities relatively quickly. However, because the companies recruit and employ very few migrant workers, the companies have not been able to fully implement the RRM and its policies and procedures and conduct the CBA.<sup>44</sup> The project ended up working with four recruiting agencies that do not recruit for the two pilot companies, as originally intended in the project design, and that do not specifically recruit for the seafood processing sector. While implementing responsible recruiting practices should have a positive impact on how these agencies recruit migrant workers, the impact on the seafood processing sector will be minimal.

**The willingness of the pilot companies and recruiting agencies to commitment to and participate in project activities is critical and depends largely on perceived benefits.** Marine Fine Foods and Rayong Fish Sauce agreed to participate in the FAIR Fish project because, based on a positive experience participating in the SEAS project, they believed they would benefit by learning about international social compliance standards that, in turn, could help increase their access to international markets. A third company, Tey Seng Cold Storage initially agreed to participate in the FAIR Fish project but withdrew before activities started. One of the primary reasons the company withdrew was because it did not want the project staff to interview its migrant workers because the interviews might create expectations about benefits migrant workers should receive but are not currently receiving. Clearly, the perceived benefit from participating in the project activities did not outweigh the risks.

**SMEs in the seafood processing sector require a simple and easy-to-implement roadmap, including a compelling business reason, to implement responsible recruiting practices.** Two key characteristics of many SMEs are a shortage of human and financial resources and thin profit margins. Unlike larger companies that have more available resources, SMEs need to see a relatively short-term business return on any investment. Also, given the shortage of resources,

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<sup>44</sup> The closing of borders to mitigate the spread of COVID-19 also negatively affected the implementation of the RRM and its policies and procedures and the ability to conduct the CBA. The border closings meant that one pilot company could recruit 8-10 migrant workers as planned and the recruiting agencies could not recruit migrant workers for their client companies. Nevertheless, the evaluation team believes that even if the borders were open and companies and recruiter could recruit migrant workers, the fact that only one pilot company employs migrant workers (52) and the recruiting agencies do not recruit specifically for the seafood processing sector creates a misalignment between the target companies and the overall objective of the project.

those SMEs that decide to implement social compliance practices require relatively simple and easy-to-implement processes. These factors make working with SMEs especially challenging.

**In an emergency, such as COVID-19, projects require streamlined procurement processes to be able to distribute emergency supplies to beneficiaries in the most rapid way possible to save lives.** The project decided to distribute PPE together with IEC materials. Due to a lengthy and complicated process to develop the IEC materials, the distribution of potentially lifesaving PPE to workers and their families was delayed nearly a year after the pandemic started in Thailand. In hindsight, the PPE could have been distributed immediately without the IEC materials. Furthermore, rather than developing IEC materials such as booklets, videos, and infographics, the project might have tapped other organizations developing COVID-19 education materials (i.e., Ministry of Health). Plan International USA also might have simplified its bureaucratic requirements (i.e., requirement for all recipients to sign a form) to expedite the distribution process. Finally, the project decided to place Plan and Fair Fish logos on the PPE and IEC materials, which required USDOL approval. The approval took approximately one month.

**Drafting key documents such as the policies and procedures in the Thai language facilitates the ability of the pilot companies and recruiting agencies to review and provide comments.** Initially, TFS drafted and presented responsible recruiting policies and procedures to the pilot companies in English. During the technical assistance sessions, FAIR Fish project staff interpreted the English presentation in Thai. However, it would have been more effective to translate the policies and procedures and other materials to Thai first so they could have been presented and discussed in Thai. As is the case with the pilot companies and recruiting agencies, when the target audience does not speak English, it is more effective and efficient to present and discuss key documents and IEC materials in Thai to facilitate understanding, discussion, and learning.

**For projects that have a strong communication component, having a dedicated communication specialist on board to oversee and guide the communication strategy and activities is essential.** The project's initial staffing structure did not include a communication specialist. The project took advantage of the resignation of one of the BEOs to hire a communication specialist, given the large number of outputs related to communicating messages intended to bring about behavior change. In hindsight, having a communication specialist on board at the beginning of the project to oversee the large number of communication-related activities and outputs would have been beneficial. Any project with a strong communication component might consider having a dedicated position to manage the communication activities.

**It is critical to design and develop solutions or products with the active participation of end users such as the pilot companies and recruiting agencies.** The TFS used Thai labor laws and regulations and international social compliance standards to develop the RRM and policies and procedures for pilot companies and recruiting agencies. Once developed, TFS presented and discussed the model and policies and procedures during technical assistance and coaching sessions with pilot companies and recruiting agencies. Although not originally anticipated, the various technical assistance and coaching sessions generated questions and comments from participants that resulted in changes to improve the model and policies and procedures. The technical assistance and coaching sessions also helped the pilot companies and recruiting agencies understand the benefits from implementing the RRM and, at the same time, create ownership.

## 5.2. Good Practices

**In response to the COVID-19 prevention and mitigation measures, the project shifted face-to-face encounters, such as trainings and meetings, to online formats using primarily Zoom, LINE, and their technology features to increase effectiveness.** Shifting the trainings, meetings, and other technical assistance sessions to an online format allowed the project to continue to implement these key activities at a time when Thailand and the rest of the world were either requiring or strongly recommending quarantine measures. In addition to moving project activities to an online format using Zoom and LINE, the project introduced additional technologies to increase effectiveness such as polling, screen sharing, and YouTube videos. The project used the Office 365 online survey to request feedback from the participants of the quarterly learning and information sharing meetings. It also used Office 365 and Google Forms to capture the number of downloads of the soft files (English and Thai) of the migrant route report. While the project implemented these technologies to be able to continue to operate effectively during the COVID-19 restrictions, conducting meetings, trainings, and other events via online formats once the pandemic ends could help the project increase efficiency.

**The project employed a constructive engagement approach with the pilot companies and recruiting agencies that helped build trust.** In Thailand, some NGOs are highly critical of seafood-related businesses and their human rights records. Rather than pressuring these businesses to improve their human rights records, the FAIR Fish project has opted to engage businesses in constructive ways aimed at building trust and developing recruiting solutions based on international standards designed to prevent forced labor and human trafficking in their supply chains.

**To build capacity, the project requested that its BEOs observe the technical assistance sessions that TFS provided to the pilot companies and recruitment agencies.** The FAIR Fish project understood that the pilot companies and recruiting agencies would require technical assistance after the TFS contract ended. To help ensure continued technical assistance, the project decided to require that the BEOs join and observe the technical assistance and coaching sessions provided by TFS. In doing so, the BEOs increased their capacity to support the pilot companies and recruiting agencies after the TFS contract ended.

**The development and implementation of a learning plan intended to facilitate ongoing learning and improvement in the project.** As part of the monitoring, evaluation, research, and learning (MERL) systems, Plan encouraged the FAIR Fish project to develop and implement a learning plan. The learning plan is a self-directed process to capture key learnings and make improvements in project implementation. The process consists of identifying an insight or innovation, defining a learning product to be developed, listing the problems that the learning product addresses, and describing the process to collect data and develop the products. To date, the project's learning plan has resulted in a variety of power point presentations and technical briefs.

## 6. Recommendations

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### Recommendations for the Project

#### 1. Revise Key Indicators

**Project Objective.** The project should revise the indicator for the project objective. The project objective's only indicator is the *level of compliance with international standards for responsible recruitment for the two pilot companies*. If achieved, the overall impact on human trafficking and forced labor will be minimal because the pilot companies only employ 52 migrant workers. The project should revise the indicator to anticipate the effect that achievement of Outcome 4 (seafood processing companies and recruiting agencies act on responsible recruiting) will have on human trafficking and forced labor in the seafood processing sector. The project might consider developing an indicator to measure the number of seafood processing companies and recruiters who use the RRM to develop or revise policies and procedures that address human trafficking, forced labor, and responsible recruiting. The number or target should be based on an assessment of those seafood processing companies (both larger and small) that would be able and willing to develop the policies and procedures. Additionally, the project should review and adjust the activities under Outcome 4 to ensure they are adequate to achieve the revised project objective indicator.

**Outcome 1.** The project should also revise the indicator for Outcome 1. Its indicator is *percent increase in understanding of human trafficking and forced labor measured by self-assessments of the participants of quarterly information sharing and learning meetings*. However, only five persons completed the self-assessment survey, which weakens the ability of the indicator to measure understanding. In addition, there are no indicators to measure the effect of the dissemination of IEC materials and technical reports as well as messages delivered by the responsible recruiting app. The project might consider revising the indicator to include increased understanding of the target audiences for these materials, reports, and messages.

**Outcome 2.** The project should add an output indicator under Outcome 2 to measure the total number of responsible recruiting policies and procedures that the pilot companies develop. Currently, the number of policies and procedures are captured under the testing the RRM output (OPT 2.1.1). To facilitate monitoring and reporting, we believe the project should track and report on the total number of policies and procedures developed separate from testing the RMM.

**Outcome 3.** The project should revise output indicator 3.2.2 to count the total number of policies and procedures that recruiting agencies develop. The project decided to combine the output indicator to revise recruiting agency policies and procedures (OPT 3.2.1) with the output indicator to develop new recruiting agency policies and procedures (OPT 3.2.2) because OPT was no longer relevant. The new combined EOP target is 9 policies and procedures. Even though each recruiting agency develops its own set of policies and procedures and implements the differently, the project set the total target of 9 policies and procedure. It is more accurate to count the total number policies and procedures that can be disaggregated by agency and by policy.

## **2. Simplify the RRM and Manual**

The project should consider simplifying the RRM, making it more user friendly and feasible to implement for seafood processing companies with limited human and financial resources. The current RRM is a strong document based on Thai labor laws, international social compliance and labor standards, and research. However, the manual is more than 350 pages in length and is difficult to read and absorb for those who were not involved in its development or those who are not familiar with international social compliance and management systems. The project intends to develop an online modular communication package where the key RRM components would be summarized and simplified. The online modular package would have a link to the full RRM for those who want to learn more. For those companies and recruiters that want to learn more about responsible recruiting standards, the RRM would still be intimidating. The project should revise RRM to provide a clear, simple, and easy-to-understand roadmap to implement the most essential responsible recruiting practices.

## **3. Broaden Target to Include Larger “At-Risk” Seafood Processing Companies**

The project should consider broadening its primary target to include larger seafood processing companies (not just SMEs) that export product to international markets and that may not be following responsible recruiting practices. According to TFS, government officials, pilot companies, and civil society organizations working with migrant workers in the seafood processing sector, there is a consolidation within the seafood processing sector in Thailand where many SMEs have gone out of business while others are struggling to stay in business. While larger seafood processing companies have more resources than SMEs, they may not be following responsible recruiting practices due to lack of information and experience that creates risk for migrant workers. The project should consider including in its target larger seafood processing companies that put migrant workers at risk. The risk factors might include those companies that do not have a social compliance management system in place, those that employ a large migrant workforce, and those that export to international markets that are sensitive to issues such as human trafficking and forced labor. The target would be those seafood processors who employ migrant workers at risk for labor rights abuses rather than just the size of the company. It would be especially important for the project to understand these companies’ workforce and business models before engaging.

## **4. Develop a Strategy to Promote Responsible Recruiting**

The project should develop a detailed strategy to promote the RRM and convince as many seafood processing companies and recruiting agencies as possible to implement the model’s critical elements. The strategy should include those companies and agencies that show the most promise for adopting the RRM (target audience), a simplified RRM with the most critical elements, a compelling business case for why companies and agencies should adopt the model, communication plan including materials, and specific plans to engage those stakeholders who can help promote and convince companies and agencies to adopt the model.

Under Outcome 4, the project intends to develop the business case and communication package that can integrate into the strategy. The project has also developed brief engagement concept notes for the government and US-based SMEs that import seafood from Thailand. The project should

convert these concept notes to more detailed work plans and develop additional engagement plans for other key factors including seafood processing associations, seafood processing-related federations, recruiting associations, civil society organizations, and international organizations interested in responsible recruiting.

Because most small seafood processing companies do not belong to larger trade associations, the project should work through more appropriate structures such as provincial fisheries associations that are located in key coastal areas. In addition, the project should work with the Department of Fisheries and its offices in the coastal provinces to help identify seafood processing companies that might be interested in adopting the model.

## **5. Develop Detailed Sustainability Plan**

The project should develop a detailed sustainability plan that provides a clear roadmap to sustain key outputs and outcomes during the project's remaining life. While the project document includes a short description on how it intends to achieve sustainability, it does not have a detailed plan. The project has achieved important sustainability success factors such as ownership and capacity of the RRM among pilot companies and recruiting agencies. These provide a solid foundation on which to build the sustainability plan. The sustainability plan should define the output or outcome to be sustained, the strategy along with concrete action steps to sustain each output or outcome, the government agency or partner organization responsible for the different strategies and action steps, the timeframe for implementing the strategies, and the required resources to implement the strategies. The sustainability plan should also include a set of indicators or benchmarks to measure progress in implementing the plan.<sup>45</sup> The project might consider using the sample sustainability matrix developed by OCFT and used in many of its projects, or the sustainability planning matrix in ILAB's Office Trade and Labor Affairs Sustainability Guide.<sup>46</sup>

## **6. Pilot the Recruiter Online Course in Language of Recruiters**

The project should consider developing and piloting the recruiter online training course in the native languages of the target audience in Thailand, Myanmar, and Cambodia so they can fully participate, learn, and provide critical comments to improve the course. As discussed in Section 3.2.3 and in Exhibit 10, the project is considering piloting the online responsible recruitment course in English, which could decrease its effectiveness and the quality of feedback provided by recruiters because English is their second or third language. Developing the pilot course in languages appropriate for recruiters in Thailand, Myanmar, and Cambodia will also facilitate offering the course to more recruiters after the pilot phase. If the project and the digital platform developer determine that it is not feasible to make changes to course content in various languages after it is online, the project should ensure that the target audience of recruiters speak a high level of English so they fully understand the content and can provide valuable comments to improve the course for future participants.

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<sup>45</sup> Note that the indicators or benchmarks are intended to measure progress in implementing the plan but are not meant to measure sustainability.

<sup>46</sup> [https://www.dol.gov/sites/dolgov/files/ILAB/Sustainability\\_Guide\\_Final\\_Report\\_08-22-2018.pdf](https://www.dol.gov/sites/dolgov/files/ILAB/Sustainability_Guide_Final_Report_08-22-2018.pdf)

## **7. Provide Project Documents and Materials in Language of Target Audience**

The project should provide key documents and IEC materials in Thai or in the primary language of the migrant workers the project intends to reach. TFS developed the RRM, policies and procedures, and technical assistance materials in English, which needed translation to Thai for the pilot companies and recruiting agencies during technical assistance and coaching sessions. Translating proved to be less effective than presenting the documents in Thai. The policies and procedures have not yet been translated to the languages of migrant workers so they can read and understand them. Whenever possible and feasible, the project should provide key documents and materials in the primary language of the target audience to maximize understanding and learning.

### **Recommendations for Plan International USA**

## **8. Contract an Expert Consultant to Help Revise RRM**

Plan International USA should work with the project to identify and contract an expert consultant to provide technical support to project staff to revise the RRM. The project intends to assign its staff to revise the RRM and manual based on feedback provided by the pilot companies, recruiting agencies, and other stakeholders. The revision process should include simplifying the RRM (Recommendation #6). The revision process that includes incorporating company and recruiter feedback and its simplification will require someone with expert technical experience (i.e., social management systems, migrant workers, and seafood sector) and communication experience (i.e. how to communicate complex ideas in simple and easy-to-understand ways). Project staff members are highly capable but will require expert technical support to revise the RRM along the lines described above. Working with an expert consultant will also help strengthen the project team's capacity.

## **9. Precisely Define Objectives, Products, and Processes in Contracts**

Plan (USA and Thailand) and the FAIR Fish project should ensure that future contracts and scopes of work clearly define the objectives, products or deliverables, and processes required of the contractors. A lack of clarity in contracts with TFS and Quizrr created misunderstandings that caused delays and hindered implementation.<sup>47</sup> To avoid misunderstandings that hinder implementation, future contracts and scopes of work should clearly discuss what is expected of the contractors including precisely defined objectives, products and deliverables, and processes of the consultancy.

## **10. Develop Emergency Response Guidelines**

Plan should consider developing emergency response guidelines for situations such as COVID-19 that require rapid response times to distribute lifesaving supplies to those in need. Although USDOL approved Plan's request to realign the project budget to distribute PPE and COVID-19 information in April 2020, at the time of the interim evaluation, a year later, these COVID-19 materials had not yet been distributed to workers and their families. Plan International USA should work with Plan Thailand and the FAIR Fish project staff to assess the reasons why the response

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<sup>47</sup> Quizrr is the company that developed the responsible recruiting app for mobile phones.

was so slow and use this information and insights to develop emergency response guidelines to help ensure timely relief for those affected by an emergency in the future. The emergency response guidelines can and should be applied to other Plan projects as appropriate.

## **Recommendations for USDOL**

### **11. Request Expenditure Projections**

USDOL should request the project to develop budget expenditure projections based on at least two scenarios regarding COVID-19 assumptions. For example, one scenario might be effective vaccination campaigns and other prevention measures to significantly slow the spread of the virus so the project can return to face-to-face encounters like training, meetings, conferences, and other technical assistance activities. Another scenario might be less effective vaccination campaigns and preventative measures resulting in infection rates remaining relatively high. In this scenario, the project would have to operate in largely an online mode for the foreseeable future. The budget expenditure projections will help USDOL and the project to determine the amount of funds that will be unspent by December 31, 2022.

### **12. Provide a No-Cost Extension**

If the expenditure projections suggest that the project will be underspent by the end of the project, USDOL should consider providing a no-cost extension. While the no-cost extension would allow the project to implement certain activities delayed by COVID-19 and other reasons, the primary purpose would be to allow the project time to concentrate its efforts on Outcome 4, which is to promote responsible recruiting policies and practices. If the project can effectively promote responsible recruiting practices so that a significant number of seafood processing companies and recruiting agencies adopt those practices that help reduce human trafficking and forced labor, the project will achieve its primary objective while sustaining the RRM.

## **Annex A: Terms of Reference**

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## **Annex B: Interview Guides**

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## Annex C: Analysis of Project Performance

The following analysis of project performance is focused on the progress made in achieving the project’s outcome and output indicator targets as reported in the April 2021 TPR.

Exhibit 13 shows the project objective and its indicator (PO-1), end of project (EOP) indicator targets, achievements against the indicator targets, and variance. The project developed a traffic light style scoring system to assess achievement of the indicator target as summarized below.

- *Green*: The aggregated score is 80 percent or higher than the maximum score, which is considered to be in full compliance with international responsible recruiting standards.
- *Yellow*: The aggregated score is between 50 percent and 79 percent of the maximum score, which is considered to be in partial compliance with international responsible recruiting standards.
- *Red*: The aggregated score is below 50 percent of the maximum score, which is considered to be non-compliant with international responsible recruiting standards.

Rayong Fish Sauce received a green classification because it scored 88.75 percent. However, the company was already fully compliant before project activities started since it received a baseline score of a green classification. Marine Fine Foods, on the other hand, received a baseline score of a yellow classification but has not participated in the final compliance assessment because its staff have not been available. The project intends to conduct the compliance assessment for Marine Fine Foods during the next reporting period.

**Exhibit 12. Performance of the Project Objective**

Project Objective and Indicator	EOP Target	Achieved April 2021	Variance
<b>Project Objective:</b> To reduce forced labor and human trafficking in the recruitment of women and men in seafood processing sector in Thailand			
PO-1: Level of compliance with international standards for responsible recruitment	RFI: Green MFF: Green	Green NA	0 NA

The indicator is inadequate to measure the achievement of the project objective. Even if the two pilot companies receive a green classification (fully compliant with international recruiting standards), the impact on forced labor and human trafficking in the seafood processing sector in Thailand will be miniscule because they employ very few migrant workers. Marine Fine Foods does not employ, nor does it intend to recruit migrant workers. Rayong Fish Sauce employs 52 migrant workers and plans to recruit an additional eight to ten migrant workers but no more. A more appropriate indicator would have been the number of seafood processing companies that adapt the critical elements of the project’s responsible recruiting model (RRM).

Exhibit 14 shows Outcome 1 and its indicator (OTC), its three outputs and indicators (OTP), end of project (EOP) indicator targets, achievements against the indicator targets, and the variance. The project set an EOP target of 50 per cent for OTC 1 and achieved 100 percent as reported in

the April 2021 TPR. The change in the level of understanding of the nature of forced labor and human trafficking in the recruiting process was measured by a self-assessment survey tool administered to participants of the quarterly information sharing and learning meetings.<sup>48</sup>

While 54 persons attended at least one quarterly information sharing and learning meeting (OPT 1.2.1), only seven attended three or more meetings. No one attended more than four meetings while pilot companies and recruiters only attended one meeting. Due to low and inconsistent participation in the meetings, only five persons participated in the self-assessment survey, which represents a very small sample to be able to draw conclusions about any increase of stakeholder understanding about the nature of forced labor and human trafficking in the recruitment of migrant workers.

In addition, the project has disseminated IEC materials and technical reports to a broader audience than those who participate in the quarterly information sharing and learning meetings and intends to reach companies, recruiting agencies, and migrant workers with responsible recruiting messages via a responsible recruiting application for mobile phones. The Outcome 1 indicator does not capture these efforts.

**Exhibit 13. Performance of Outcome 1**

<b>Outcome, Outputs, and Indicators</b>	<b>EOP Target</b>	<b>Achieved April 2021</b>	<b>Variance</b>
<b>Outcome 1: Improved understanding of the nature of forced labor and human trafficking in the recruitment of workers</b>			
OTC 1. Percentage change in the level of understanding of the nature of forced labor and human trafficking in the recruitment of workers	50%	100%	+50%
<b>Output 1.1: Targeted outreach messages to recruiters, company staff and workers about forced, human trafficking, labor rights, and responsible recruitment disseminated</b>			
OTP 1.1.1. Number of times forced labor and human trafficking messages are delivered	1,025	194	-831
<b>Output 1.2 Stakeholders participating in information sharing and lessons learned events</b>			
OTP 1.2.1. Number of stakeholders participating in information sharing and lessons learned events	74	54	-20
<b>Output 1.3: Responsible recruitment-related reports documented and disseminated</b>			
OTP 1.3.1. Number of project reports on responsible recruitment disseminated	1,006	403	-603

The EOP target for OTP 1.1.1 is 1,025 times that forced labor and human trafficking messages were delivered. To date, the project reported that messages were delivered only 194 times via

<sup>48</sup> The increase in understanding is assessed across three domains (1) the participant's ability to describe to other people the meaning of forced labor and human trafficking in the recruitment of migrant workers; (2) the participant's ability to explain the causes of forced labor and human trafficking in recruitment; and (3) the participant's ability to identify ideas to solve problems related to forced labor and human trafficking in recruitment.

LINE messaging application, social media (Facebook and YouTube), and e-mails. One of the reasons for the low performance of Output 1.1 is because the project is still in the process of defining its target audiences for the messages and developing a communication strategy. Once the communication strategy is finished, the project intends to review and revise the delivery mechanisms and target values for the messages. It also intends to publicize the links to the LINE messaging application and FAIR Fish's Facebook page.

The EOP target for OTP 1.2.1 is 74 stakeholders participating in quarterly information sharing and learning meetings. As of April 2021 the project reported that 54 stakeholders participated in at least one of six meetings conducted so far. The meeting attendance has been low and inconsistent. Only seven stakeholders attended three or more meetings, and no one attended more than four meetings. The pilot companies and recruiting agencies only attended one meeting. It is not clear to the evaluator whether participation in one meeting is a sufficient contribution to increase understanding of the nature of forced labor and human trafficking in the recruitment of workers (Outcome 1).

The EOP target for OTP 1.3.1 is 1,006 times that project reports on responsible recruitment are disseminated. The April 2021 TPR reported that project reports were disseminated 403 times. According to project staff, the performance of Output 1.3 is low because the project has had only one report approved, migrant routes study, to disseminate to stakeholders. However, according to USDOL, the migrant routes study, key practices document, the pre-situational analysis and its related technical brief on recruiting practices, and the RRM have been accepted. There appears to be confusion as to what documents have been accepted by USDOL and can be disseminated.

Exhibit 15 shows Outcome 2 and its indicator (OTC), its three outputs and indicators (OTP), EOP indicator targets, achievements against the indicator targets, and the variance. The project uses the traffic light system to measure the achievement of Outcome 2 as described below.

- *Green*: The aggregated score is 80 percent or higher than the maximum, which is considered in full compliance with international responsible recruiting standards.
- *Yellow*: The aggregated score is between 50 percent and 79 percent of the maximum score, which is considered in partial compliance with international responsible recruiting standards.
- *Red*: The aggregated score is below 50 percent of the maximum score, which is considered to be non-compliant with international responsible recruiting standards.

The project set an EOP target of a *green* classification for OTC 1 and achieved it as reported in the April, 2021 TPR. The improvement in company-led approaches to address forced labor and human trafficking in the recruitment process was measured by the company assessment tool. Rayong Fish Sauce and Marine Fine Foods received a baseline classification of *red* and *yellow*, respectively. Both companies improved their scores to a *green* classification because they developed policies and procedures on responsible recruitment that were in full compliance with international standards. It should be noted, however, that neither company has fully implemented the policies and procedures because they are not currently recruiting migrant workers and because some of the policies are not feasible to implement.

Although both companies received a *green* classification, neither achieved 100 percent. Marine Fine Foods did not provide adequate detail to support all of its policies. For example, the company did not mention the number of training hours for pre-employment training on occupational health and safety, did not formally notify employees about life insurance provided by the company, and did not mention pre-employment training in the master training plan which is a supporting document of the company’s procedure. Rayong Fine Foods did not fully develop criteria for selecting recruitment agencies, did not adhere to overtime hours based on BSCI guidelines, did not mention pre-employment training for workers and training on basic human rights for management in company’s training plan, did not map the MOU recruitment process, and did not have supporting documents describing remedial action in the event of negative findings from the recruitment supply chain.

#### Exhibit 14. Performance of Outcome 2

Outcome, Outputs, and Indicators	EOP Target	Achieved April 2021	Variance
<b>Outcome 2: Improved company-led approaches to address forced labor and human trafficking in the recruitment process</b>			
OTC 2. Level of policy and procedural compliance with international standards for responsible recruitment	RFI: Green MFF: Green	RFI: Green MFF: Green	0
<b>Output 2.1: Pilot companies provided with technical assistance and tools for responsible recruitment</b>			
OTP 2.1.1. Number of technical assistance sessions provided to pilot companies	72	232	+160
<b>Output 2.2: Responsible recruitment model(s) piloted</b>			
OTP 2.2.1. Piloted responsible recruitment model	8 milestones	5 milestones	-3 milestones

The project set an EOP target for OTP 2.2.1 of 72 technical assistance sessions for the two pilot companies. TFS provided 232 technical assistance sessions, which exceeds the target by 160 sessions. According to TFS, the project underestimated the demand for information about laws, regulations, standards and how they can be applied in practical ways. The keen interest and questions required TFS to schedule many more technical assistance sessions than originally anticipated.

The project uses a milestone system to assess the achievement of Output 2.2. The RRM is considered piloted when the following milestones have been achieved:

1. Pilot companies selected and sign agreements
2. Before and after methodology developed for conducting the pilot study.
3. Baseline survey conducted.
4. RRM developed.
5. Appropriate interventions implemented.
6. Data collected.
7. Analytical report produced.
8. Business model developed.

In the April 2021 TPR, the project reported that milestones 1, 2, 3, 4, and 7 were completed while milestones 5, 6, and 8 were partially completed. Milestone 5 was partially completed because the companies are still in the process of implementing RRM interventions while milestone 6 was partially completed because the endline assessment for Marine Fine Foods has not been completed. Regarding milestone 8, the project contracted a consulting team to develop a cost benefit analysis (CBA) approach and tools. However, the companies have not been able to conduct the CBA because they are not currently recruiting migrant workers.<sup>49</sup>

Exhibit 16 shows Outcome 3 and its indicator, its four outputs and their indicators, end of project indicator targets, achievements against the indicator targets, and the variance. The project also uses the traffic light system to assess achievement of OCT 1 as follows:

- *Green*: The aggregated score is 80 percent or higher than the maximum, which is considered in full compliance with international responsible recruiting standards.
- *Yellow*: The aggregated score is between 50 percent and 79 percent of the maximum score, *red* which is considered in partial compliance with international responsible recruiting standards.
- *Red*: The aggregated score is below 50 percent of the maximum score, which is considered to be non-compliant with international responsible recruiting standards.

The recruitment assessment tool captures the data for this indicator. The EOP targets are set as a one-step improvement over the baseline classification. For example, if the baseline classification was *red*, the EOP target is *yellow*; if the baseline classification was *yellow*, the EOP target is *green*. The baseline assessment indicated that three agencies (8Tidgoodpower, Global Events, and Billion Thai Supply Group) were classified as *red* while Central Unity Group Service was classified as *yellow*. Thus, the EOP targets for 8Tidgoodpower, Global Events, and Billion Thai Supply Group is *yellow* while the EOP target for Central Unity Group Service is *green*.

The project has not been able to conduct the endline compliance assessment for the recruiting agencies because they have not been available to participate, which explains zero achievement as of April 2021. Following the government's decision to allow in-country registration of undocumented migrant workers, the recruiting agencies were busy from mid-January to mid-February 2021 with the registration process.

The project intends to conduct the endline assessment in April or May 2021 and report the achievements in the October, 2021 TPR. However, the evaluator learned that during the course of the interim evaluation, 8Tidgoodpower went out of business and Central Unity Group Service suspended operations indefinitely. It is not clear to what extent these two recruiting agencies will be able to participate in the endline compliance assessment.

The EOP target for OTP 3.1.1 is 24 coaching sessions. TFS provided six coaching sessions for each of the four pilot recruiting agencies to reach the target of 24 total sessions. During interviews, representatives from the four recruiting agencies reported that the coaching sessions were valuable

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<sup>49</sup> Marine Fine Foods will not be able to fully apply the CBA because it does not intend to recruit migrant workers. While Rayong Fine Foods intends to recruit 8-10 migrant workers, it has not been able to do so because the Thai borders are closed to help prevent the spread of COVID-19.

and much appreciated. The sessions helped the recruiting agencies understand international recruiting standards and compliance issues.

### Exhibit 15. Performance of Outcome 3

Outcome, Outputs, and Indicators	EOP Target	Achieved April 2021	Variance
<b>Outcome 3: Improved compliance with recruitment policies and procedures by third-party recruiters</b>			
OTC 3. Level of compliance of third-party recruiters with international standards for responsible recruitment	4	0	-4
<b>Output 3.1: Targeted technical assistance sessions to targeted recruitment agencies provided</b>			
OTP 3.1.1. Number of coaching sessions provided to targeted recruitment agencies	24	24	0
<b>Output 3.2: Targeted recruitment agencies' policies and procedures revised and/or developed</b>			
OTP 3.2.1. Number of recruitment and recruitment-related policies and procedures of targeted recruitment agencies revised	2	0	-2
OTP 3.2.2. Number of recruitment and recruitment-related policies and procedures of targeted recruitment agencies developed	7	9	+2
<b>Output 3.3: Internal monitoring system to consistently track the implementation of targeted recruitment agencies' policies established and operating</b>			
OTP 3.3.1. Recruitment monitoring system established and operational	6 milestones	5 milestones	-1 milestone
<b>Output 3.4: Third-party recruiters trained on the responsible recruitment model curriculum</b>			
OTP 3.4.1. Number of third-party recruiters trained who demonstrate increased knowledge about responsible recruitment	495	0	-495

The EOP target for OTP 3.2.1 is the revision of two policies and procedures. However, the project reported that TFS did not revise any policies and procedures, which explains the zero achievement. Rather, it had to work with the four recruiting agencies to develop new policies and procedures, which is OTP 3.2.2. While the EOP target assumed that seven sets of policies and procedures would be developed per agency, TFS actually worked with each pilot agency to develop nine sets of policies and procedures per agency. As of April, 2021 all four pilot agencies had developed their nine sets of policies and procedures.

The project counts the policies and procedures once even though each pilot company and recruiting agency developed its own set of policies and procedures and are implementing them differently. In the opinion of the evaluator, the project should count the total number of policies and procedures

developed, which would be nine policies and procedures developed for the four recruiting agencies or 36 in total. Also, the project assumed it would revise two policies and procedures of the pilot recruiting agencies and develop seven new policies and procedures. In reality, it did not revise policies but had to develop nine new policies and procedures for each recruiting agency. Revising policies and procedures is no longer relevant and could be combined with revising policies and procedures that would facilitate performance assessment in the final evaluation.

The project also uses a milestone system to assess the achievement of Output 3.3. The internal monitoring systems are considered established and implemented when the following six milestones have been achieved:

1. Criteria for the monitoring checklist meeting international standards developed
2. Internal monitoring protocol developed
3. Internal monitoring team of each targeted recruitment agency coached
4. Recruitment monitoring system and internal monitors tested
5. Recruitment monitoring system revised, and additional coaching provided as needed
6. Internal monitoring conducted as scheduled and independently verified

In the April 2021 TPR, the project reported that all four recruiting agencies completed milestones 1-5. However, milestone 6 was not achieved because the recruiting agencies were not available to participate in the final internal monitoring verification assessment. The project intends to conduct the assessment in April or May 2021 and report the results in the October 2021 TPR. However, as noted above, 8Tidgoodpower and Central Unity Group Service are no longer operating so it is not clear to the evaluator to what extent they will participate in milestone 6.

Regarding Output 3.4, the project initially intended to train 585 recruiters from Thailand, Myanmar, and Cambodia using a trainer of trainers approach (TOT). The TOT workshops were cancelled due to the COVID-19 pandemic. Instead, the project decided to provide online training to 495 recruiters.<sup>50</sup> At the time of the interim evaluation, two consulting firms had been contracted and were working on developing the content and digital platform for the online training course.<sup>51</sup>

One issue that could affect the delivery of the training course is the political unrest in Myanmar. The online training course requires participants to have an internet connection. To address the protests, the Myanmar military leaders have limited access to the internet for most of the population. The project is currently exploring ways that the training might be offered without an internet connection such as sending USB drives to participants loaded with the training content.

Exhibit 17 shows Outcome 4 and its indicator (OTC), its four outputs and their indicators (OTP), end of project indicator targets, achievements against the indicator targets, and the variance. Based on the project's sequencing of activities, Outcome 4 activities are scheduled to take place once the RRM has been piloted (Outcome 2) and once the pilot recruiting agencies have developed

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<sup>50</sup> The 495 target includes 45 recruiters (15 from each country) who will participate in a pilot workshop and 450 who will be trained once the online training course is finalized and offered.

<sup>51</sup> Two consultant teams include allianceHR, contracted to develop the online course content based on the RRM and Simform to develop the digital platform of the online course. The project will utilize the Plan International's existing learning platform, "YES! Academy," for hosting the training courses.

responsible recruiting policies and procedures and have established their internal compliance monitoring systems (Outcome 3). Therefore, at the time of the interim evaluation, the project was just beginning to implement Outcome 4 activities, which explains why the achievements are reported as “0”.

The exceptions are work to develop the business case (OTP 4.1.1) and engagement with stakeholder groups (OTP 4.3.2). The project contracted a consulting firm to develop an approach and tools to conduct a cost-benefit analysis, which is one of the first steps to developing a business case.<sup>52</sup> Also, the project met with the Ministry of Labor to present the FAIR Fish project and discuss possible collaboration with this potential and important stakeholder group.

#### Exhibit 16. Performance of Outcome 4

Outcome, Outputs, and Indicators	EOP Target	Achieved April 2021	Variance
<b>Outcome 4: Increased action on promoting responsible recruitment policies and practices among private sector actors</b>			
OTC 4. Number of activities in which project stakeholders use FAIR Fish materials to promote responsible recruitment	15	0	-15
<b>Output 4.1 Responsible recruitment business case documented and distributed</b>			
OTP 4.1.1. Number of recipients of the business case report	225	0	-225
<b>Output 4.2: Communications packages for promotion of responsible recruitment practices developed and disseminated</b>			
OTP 4.2.1. Number of recipients of communications packages	431	0	-431
<b>Output 4.3: Private sector companies, business associations, and recruitment agencies engaged</b>			
OTP 4.3.1. Volume of online responsible recruitment platform traffic	680	0	-680
OTP 4.3.2. Number of engagements with stakeholder groups	26	1	-25
<b>Output 4.4: Pilot companies' implementation of working conditions policy in response to the effect of COVID-19 pandemic on workers and their families</b>			
OTP 4.4.1. Number of people who receive hard-copy IEC materials related to COVID-19 disseminated by the pilot companies	2,708	0	-2,708
OTP 4.4.2. Number of people who receive online IEC materials related to COVID-19 disseminated by the pilot companies	36	0	-36
OTP 4.4.3. Number of workers receiving PPE disseminated by the pilot companies	2,400	0	-2,400

<sup>52</sup> At note previously, another reason Rayong Fish Sauce pilot has not been able to conduct the cost-benefit analysis is because it cannot recruit migrant workers because the borders are closed.

It should be noted that the original project design did not include Output 4.4. This output, which includes actions to mitigate the impact of COVID-19 on workers and their families, was developed based on a concept note that Plan International USA developed and submitted to USDOL for approval on April 10, 2020. The concept note proposed reallocating resources within the budget to fund the production and dissemination of COVID-19 IEC materials (hard copies and digital versions) and procurement and dissemination of personal protective equipment (PPE) for workers and their families in the pilot companies. USDOL accepted the proposal and requested a revised budget. The revised budget, adding Output 4.4, was submitted on May 20, 2020 and approved by USDOL on June 9, 2020.

The COVID-19 activities have experienced delays. The project prepared and submitted a requisition to purchase PPE to Plan Thailand's administrative and procurement unit on June 18, 2020. The project decided to place the Plan and FAIR Fish logos on the PPE (masks and tote bags), which delayed the procurement about six weeks until USDOL approved the logos and purchase of the face masks and tote bags on July 31, 2020. The procurement of the PPE was delayed another six weeks because the project had to find a vendor that could manufacture the face masks and tote bags with the Plan and FAIR Fish logos. The special order took the vendor more than a month to manufacture and deliver.

The production of the hard copies of the IEC materials (booklets, posters, and infographics) have been delayed almost one year (October 2020 to May 2021) due to delays caused by COVID-19 pandemic mitigation measures and a lengthy and prolonged materials development process. The materials development process consisted of developing message concept notes, recruiting a graphic designer, designing the materials, translating the materials into Thai, Burmese, and Khmer, review and approval by Plan International USA (several iterations), final editing, and printing.

Since the hard copies of the IEC materials will be used to produce the digital versions, these too have been delayed. Finally, since the project intends to provide the hard copies of the IEC materials together with the PPE in a tote bag, the dissemination of the PPE will be placed on hold until the hard copies of the IEC materials are ready to disseminate. At the time of the interim evaluation, the dissemination of the IEC messages and PPE were placed on hold again because Plan Thailand required its staff to work from home to protect them from a third wave of COVID-19 in the country.<sup>53</sup>

The delay in the development and dissemination of the COVID-19 IEC materials and PPE is unfortunate since the daily rate of COVID-19 infections has been on a steep increase since December 2020. For example, the number of COVID-19 cases on December 20, 2020 was 5,289. On May 3, 2021, the number of new COVID-19 cases was 68,984.<sup>54</sup>

Exhibit 18 shows the OCFT standard indicators along with the EOP target, achievements, and variance. OCFT requires its grantees to collect comparable information related to the outputs and outcomes using a set of standard indicators. These standard indicators are combined and used to broadly measure the contributions and outcomes of OCFT grantees as part of international efforts

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<sup>53</sup> <https://www.reuters.com/world/asia-pacific/thailand-reports-2438-coronavirus-cases-daily-record-11-deaths-2021-04-25/>

<sup>54</sup> <https://ourworldindata.org/coronavirus/country/thailand>

to combat child labor, forced labor, and other violations of labor rights. They also serve as input to OCFT’s performance reporting, planning, and budgeting.

The OCFT standard indicators may or may not form part of the project’s theory of change. In the case of the FAIR Fish project, the standard indicators are related to key outcomes but do not form part of the causal logic in the theory of change. The FAIR Fish project is required to report on the following three standard indicators:

- **Standard Indicator 1:** Number of individuals provided with training or other support to improve enforcement of or compliance with child labor, forced labor, or other worker rights, laws, or policies.
- **Standard Indicator 2:** Number of private sector recruitment and recruitment-related policies drafted/accepted with USG assistance to promote gender equality or non-discrimination.
- **Standard Indicator 3:** Number of stakeholder groups that have received USG assistance to improve working conditions, combat discrimination, and/or improve compliance with worker rights and safety and labor standards.

**Standard Indicator 1 (T-1):** The project set an EOP target of 945 individuals who are provided with training or other support to improve enforcement of or compliance with child labor, forced labor, or other worker rights, laws, or policies. This indicator is an aggregation of three output indicators and includes pilot company representatives receiving technical assistance (OTP 2.1.1, 288), representatives of recruiting agencies receiving coaching (OTP 3.1.1, 72), and the anticipated number of recruiters from Thailand, Myanmar, and Cambodia receiving training on responsible recruiting practices (OTP 3.4.1, 450). The project reported achieving 907 individuals receiving training and other support based on the number of pilot company staff and recruiting agency staff that received technical assistance and coaching from TFS.<sup>55</sup>

**Exhibit 17. OCFT Standard Indicators**

<b>USDOL Standard Indicators</b>	<b>EOP Target</b>	<b>Achieved April 2021</b>	<b>Variance</b>
Number of individuals provided with training or other support to improve enforcement of or compliance with, child labor, forced labor, or other worker rights, laws, or policies	945	907	-38
Number of private sector recruitment and recruitment-related policies drafted/accepted with USG assistance to promote gender equality or non-discrimination	8	8	0
Number of stakeholder groups that have received USG assistance to improve working conditions, combat discrimination, and/or improve compliance with worker rights and safety and labor standards	7	5	-2

<sup>55</sup> The number of individuals provided technical and assistance and coaching that was reported in the April 2021 TPR is 907. However, the project’s M&E officer notified the evaluator that based on count revisions made by TFS, the number achieved should be 923.

**Standard Indicator 2 (W-GDP 3.1):** This indicator includes the eight policies and procedures developed for the two pilot companies and nine policies and procedures developed for four recruiting agencies. The policy and procedure categories for the pilot companies include anti-human trafficking, decent working conditions, freedom of association and collective bargaining, grievance and remediation, no child labor, no forced labor, non-discrimination, and responsible recruitment. The recruitment agencies developed the same policies and procedures along with a policy on ethical business practices for recruitment agencies. The policies and procedures for the two pilot companies and four recruiting agencies have been completed.

As stated previously, the evaluator believes the total number of policies and procedures developed for the 2 pilot companies (16 policies and procedures) and four recruiting agencies (36 policies and procedures) should be reported.

**Standard Indicator 3 (W-GDP 3.2):** The project set an EOP target of seven stakeholder groups receiving assistance to improve working conditions, combat discrimination, and/or improve compliance with worker rights and safety and labor standards. This indicator is based on three output indicators and includes number of stakeholder groups participating in quarterly information sharing and learning meetings (OTP 1.2.1), number of stakeholder groups receiving the business case (OTP 4.1.1), and number of stakeholder groups receiving the communications package (OTP 4.2.1). The target includes the following seven stakeholder groups: companies, trade associations, recruiting agencies, professional service providers, NGOs/international organizations, government, and academia. The April 2021 TPR reported five stakeholder groups receiving assistance based on their participation in the quarterly information sharing and learning meetings. These include companies, trade associations, recruiting agencies, professional service providers, and NGOs. The project intends to reach these five stakeholder groups along with government and academia stakeholders when it disseminates the business case and communication package.

## **Evaluator Conclusions**

Exhibit 19 shows the evaluator's ratings of the achievement of the project's objective and outcomes. The rating scale consists of low, moderate, above-moderate, and high achievement categories. The data points for the ratings include the project's TPRs (narrative and Annex A), interviews with key stakeholders, and the evaluator's professional opinion.

**Project Objective.** The evaluator rated the achievement of the project objective low primarily because the project objective indicator is inadequate. Even if the two pilot companies are found to be fully compliant with international recruiting standards, the impact on forced labor and human trafficking in the seafood processing sector in Thailand will be miniscule because they employ very few migrant workers. Marine Fine Foods does not employ, nor does it intend to recruit migrant workers. Rayong Fish Sauce employs 52 migrant workers and plans to recruit an additional eight to ten migrant workers but no more. The indicator should be revised to capture the number of seafood processing companies that implement the critical elements of responsible recruiting from the responsible recruiting model.

**Exhibit 18. Evaluator Ratings of the Achievements of the Project Objective and Outcomes**

<b>Project Objective:</b> To reduce forced labor and human trafficking in the recruitment of women and men in seafood processing sector in Thailand	
<b>Achievement</b>	
<b>Outcome 1:</b> Improved understanding of the nature of forced labor and human trafficking in the recruitment of workers	
<b>Achievement</b>	
<b>Outcome 2:</b> Improved company-led approaches to address forced labor and human trafficking in the recruitment process	
<b>Achievement</b>	
<b>Outcome 3:</b> Improved compliance with recruitment policies and procedures by third-party recruiters	
<b>Achievement</b>	
<b>Outcome 4:</b> Increased action on promoting responsible recruitment policies and practices among private sector actors	
<b>Achievement</b>	

**Outcome 1.** The evaluator rated the achievement of Outcome 1 as moderate. While the project has developed three key products (pre-situational assessment, migrant route study, and key practices report), it has underperformed on achieving the three outputs: number of messages disseminated to companies, recruiters, and workers, number of stakeholders participating in quarterly information sharing and learning meetings, and number of responsible recruiting reports disseminated. The underperformance can be primarily explained by the delay in developing the communication strategy. Once the communication strategy is finished, the project should be able to improve performance of Outcome 1 and its outputs. However, the outcome indicator is inadequate to measure the outcome and does not capture the efforts of disseminating messages to a broad audience of companies, trade associations, recruiters, and NGOs. Outcome 1 indicator should be revised to address these issues.

**Outcome 2.** The evaluator rated the achievement of Outcome 2 as high. The project largely achieved the outcome and output indicators including providing technical assistance to the pilot companies to develop and understand the responsible recruiting model and a set of eight responsible recruiting policies and procedures. The primary contribution of Outcome 2 is the responsible recruiting model manual that will be used to promote responsible recruiting practices to a broader audience of seafood processing companies and recruiting agencies under Outcome 4.

**Outcome 3.** The evaluator rated the achievement of Outcome 3 as above-moderate. The project provided effective coaching sessions to the four pilot recruiting agencies that helped them develop and understand a set of nine responsible recruiting policies and procedures. The evaluator did not rate Outcome 3 as high because there is still one key output that has not been achieved. The training of recruiters in Thailand, Myanmar, and Cambodia was supposed to have been conducted by TFS using a trainers of trainer approach. The recruiter training was delayed because it has been changed to online training to protect trainers and participants from COVID-19 infection. The project has contracted two consulting firms to develop the content and the digital platform. The project intends to train 495 recruiters as soon as the content and platform are finished.

**Outcome 4.** The evaluator rated the achievement of Outcome 4 as low because the project only recently started to implement activities and, thus, has not achieved any of the indicator targets. One exception is Outcome 4.3, stakeholder engagement. The project held an initial meeting with the Ministry of Labor to discuss the FAIR Fish project and possible collaboration. It should be noted that COVID-19 activities and output have been delayed nearly one year due to a lengthy and protracted process of developing COVID-19 education materials. This is unfortunate since the daily rate of COVID-19 infections has been on a steep increase since December 2020. For example, the number of COVID-19 cases on December 20, 2020 was 5,289. On May 3, 2021, the number of new COVID-19 cases was 68,984.<sup>56</sup>

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<sup>56</sup> <https://ourworldindata.org/coronavirus/country/thailand>

## **Annex D: List of Documents Reviewed**

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- Cooperative Agreement Grant Award - Notice of Award — Grant: IL-32819-18-75-K
- Management Procedures Guidelines 2017
- Grant Award Modification #1
- Project Document: *Fostering Accountability in Recruitment for Fishery Workers*
- Comprehensive Monitoring and Evaluation Plan (CMEP)/Annexes and Tools
- Technical Progress Reports/Annexes (April 2019 through April 2021) with Annexes including workplans
- Project Budget and Expenditure Report, January 2021
- Responsible Recruiting Model Manual
- Policies and Procedures (8) for the pilot companies
- Policies and Procedures (8) for recruiting agencies
- FAIR Fish Pre-situational Assessment
- Migrant Route Mapping Report
- Key Practices in Responsible Recruiting
- FAIR Fish Sustainability Plan
- The FAIR Fish Project's Plan to Engage with Thai Ministry of Labour
- FAIR Fish Project's Plan to Engage US-based SME Importers of Thai Seafood-related Products
- Animation content for responsible recruiting app
- Thai Labor Standards
- Foreign Workers Emergency Decree No. 2
- Cost Benefit Analysis Report and Tools
- Performance Indicator Reference Sheets (OTP 1.3, 3.3, 3.3.1, 4.4.1.1, 4.4.12, 4.4.2)
- Milestone reports on coaching sessions for establishing an internal recruitment monitoring system and simulation of on-site monitoring for pilot recruitment agencies
- Summary reports from six quarterly information sessions

