
Exploitation, Control, and Responsibility Inside Chinese Seafood Packaging



Daily NK

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[Report on Forced Labor of North Korean Overseas Workers] Exploitation, Control, and Accountability Inside Chinese Seafood Packaging

Publication Date: July 18, 2025

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ISBN: 979-11-990919-3-1

Published by: Daily NK

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| Contents |

[Before We Begin]

What Is Forced Labor?	6
Research Subjects and Methodology	9
A New Approach and Methodology	10

I. North Korean Overseas Workers, Why They Deserve Global Attention	11
II. How Are North Korean Workers Being Exploited?	16
1. Deployment Process: The Starting Point of Forced Labor	16
2. Wage Exploitation: A System That Denies Workers the Full Value of Their Labor	23
3. Sexual Exploitation: A Gendered Threat Targeting Female Workers	34
4. Detention and Control Surveillance: Through Movement Restrictions	45
5. Harsh Working Conditions: Inhumane Environment and Institutionalized Discrimination	51
III. Demonstrating Forced Labor: International Standards, Legal Violations, and the Structure of Responsibility	63
1. Why Is This Considered Forced Labor?	63
2. What Has Been Violated?	65
3. Who Should Be Held Accountable?	74
IV. What Must Be Done	80
1. Action by the International Community	80
2. Strengthening Corporate Responsibility	82
3. The Role of Civil Society and the Need for Solidarity	83
V. Future Tasks: Uprooting Forced Labor at Its Source	85
1. Key Summary	85
2. Documentation as Evidence: The Need for a Monitoring System to Track Change	85

| Foreword |

This report was written to shed light on the realities faced by North Korean workers in Chinese seafood processing factories. On the surface, their situation may appear to be an economic opportunity to earn money abroad. Yet when we look deeper, we find people enduring each day without freedom, under constant surveillance and control, and without receiving fair compensation for their labor. Some workers have remained silent, while others carry pain so profound they have not even shared it with their families.

Throughout this investigation, we encountered suffering that cannot be fully captured in words. Ordinary young people, women, and heads of households are living on foreign soil without dignity. This is not a distant issue. The labor and tears of these workers are embedded in the goods we consume every day, including seafood products easily found on supermarket shelves.

Above all, we express our deep gratitude to the North Korean workers who, with quiet strength, shared their painful experiences. Though we could not reveal their names or faces, their voices were the most truthful testimonies we encountered, and their courage made this report possible. We offer our sincere respect for their strength and perseverance.

Forced labor is not simply difficult or underpaid work. It refers to work that is carried out without consent, under coercion, and without the freedom to stop. This is a clear violation of international law and a grave abuse of human rights. The fact that such practices continue to exist in our world today is a reality we cannot ignore.

Through this report, we pose a question to the international community: **Why are the lives of North Korean workers left unprotected? Can we justify turning away from a system in which workers are denied even the basic right to the fruits of their labor?** The answer lies with all of us. Only when consumers, corporations, governments, and civil society come together can we break this chain of abuse.

Now is the time to speak out. The suffering of North Korean workers is not theirs alone. The choices we make about what we buy and what supply chains we trust have the power to change their lives. Together, we can face this issue and take steps toward a better future.

It is our hope that this report serves as a starting point for change, and that it inspires a shared commitment to no longer turn away, no longer remain silent.

Finally, we express our sincere appreciation to the Bureau of Democracy, Human Rights, and Labor(DRL) of the U.S. Department of State for its generous support in making this project possible. DRL's assistance went beyond financial support. It played a vital role in amplifying the voices of those who have long remained unseen.

July 2025

Lee Sangyong

Director, Daily NK AND Center

Before We Begin

■ What Is Forced Labor?

The International Labour Organization (ILO) defines forced labor as “all work or service which is exacted from any person under the menace of any penalty and for which the person has not offered himself voluntarily.” At the core of this definition is the question of whether the worker did not choose the work freely, lacks the freedom to stop working, and faces threats or penalties for refusing to comply. Simply working under harsh conditions or receiving low pay does not in itself constitute forced labor. Even if a contract appears to be voluntarily signed, that voluntariness is rendered meaningless if the worker does not have the practical freedom to terminate the agreement.

In the case of North Korean workers dispatched abroad, their labor is structured and controlled by the state. Their personal autonomy is systematically suppressed through practices such as passport confiscation, restrictions on movement, isolation from the outside world, wage deductions, and punishment. Even if a formal contract and salary exist on paper, labor that is carried out without genuine autonomy and without protection of rights falls under the ILO’s definition of forced labor. In recognition of such situations, the ILO outlined 11 indicators for identifying forced labor in its 2012 report *Forced Labour Indicators*.

The ILO has identified 11 indicators of forced labor¹⁾

- Abuse of vulnerability
- Deception
- Restriction of movement
- Isolation
- Physical and sexual violence
- Intimidation and threats
- Retention of identity documents
- Withholding of wages
- Debt bondage
- Abusive working and living conditions
- Excessive overtime

The 11 indicators of forced labor identified by the ILO can be grouped into three analytical categories for a more systematic assessment:

Inducement and Deception	Conditions of Control	Labor Exploitation
<ul style="list-style-type: none"> • Deception • Debt bondage • Abuse of vulnerability 	<ul style="list-style-type: none"> • Restriction of movement • Isolation • Retention of identity documents • Intimidation and threats 	<ul style="list-style-type: none"> • Physical and sexual violence • Withholding of wages • Abusive working and living conditions • Excessive overtime

This classification provides a useful framework for understanding how workers are drawn into systems of forced labor, how their freedom is systematically restricted within those systems, and under what conditions exploitation ultimately occurs.

North Korean workers who apply for overseas dispatch are incorporated into a

1) The presence of even one of these 11 indicators may be sufficient to determine the existence of forced labor. When multiple indicators appear simultaneously, the likelihood of forced labor is even higher. Rather than focusing solely on “voluntary consent,” the key questions are: “Does the worker have the freedom to stop working?” and “Is there a threat of punishment?” (Forced Labour Indicators, 2012)

8 Exploitation, Control, and Accountability Inside Chinese Seafood Packaging

forced labor system from the very beginning of the dispatch process. During this process, workers are recruited based on false information without a clear understanding of their actual working conditions or wage levels. This constitutes deception. In particular, the significant discrepancy between the promised wages and the amount actually received clearly illustrates both the element of deception and the structure of exploitation. Bribes paid prior to deployment often lead to debt bondage, which the state systematically exploits to take advantage of the workers' vulnerability.

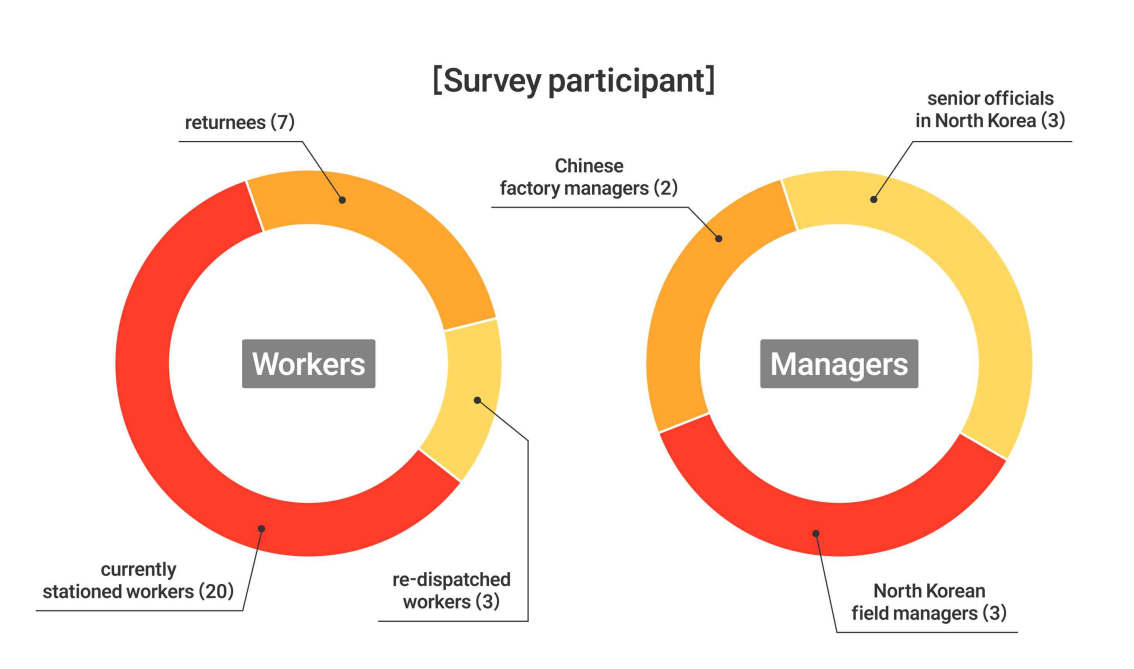
Upon arrival at seafood factories in China, North Korean workers are immediately placed in a tightly controlled environment. Their identity documents are confiscated, movement outside the factory and dormitory is prohibited, and they live in isolation with no contact with the outside world. On site, mistakes or rule violations are met with repeated threats of forced repatriation and verbal abuse, creating an atmosphere of fear.

North Korean workers are exposed to multiple forms of exploitation in the course of their labor. Some female workers experience sexual humiliation and physical threats from their supervisors, but raising complaints is virtually impossible. Wages are paid at levels far below what was promised, and even basic necessities are inadequately supplied in a setting where free movement is prohibited. Working more than 12 hours a day, six days a week is the norm, and there is no guarantee of overtime pay or adequate rest.

The cases of North Korean overseas workers analyzed in this report align with all three categories of the ILO's forced labor indicators, demonstrating clear evidence across the full spectrum.

Research Subjects and Methodology

This investigation was conducted with North Korean workers who were employed in seafood processing factories in China, as well as the managers responsible for supervising them. The specific groups surveyed are as follows.



The categories of respondents in this report are defined as follows. Dispatched workers refer to North Korean nationals currently working in seafood processing factories in China. Returnee workers are those who worked in these factories for a certain period and have since returned to North Korea. Re-dispatched workers are individuals who have been sent abroad for labor assignments more than once.

North Korean managers refer to North Korean personnel stationed at Chinese seafood factories who directly oversee and control the dispatched workers. North Korean officials are individuals based in North Korea who are responsible for selecting workers and approving their dispatch. Chinese managers refer to factory administrators or supervisors from the Chinese side who are responsible for operations and labor assignments.

10 Exploitation, Control, and Accountability Inside Chinese Seafood Packaging

The survey questions were designed to focus on wage payment, freedom of movement, contract procedures, and methods of surveillance and control. These elements were used to assess whether the situations described matched the International Labour Organization's 11 indicators of forced labor. All responses were collected through in-depth interviews, and the safety and anonymity of the participants were strictly protected.

■ A New Approach and Methodology

This report seeks to overcome the limitations of existing forced labor studies that often rely solely on victim testimonies or focus on fragmented individual cases. To address these gaps, we systematically collected and analyzed testimonies from both workers and managers. This dual perspective enables a more multidimensional understanding of how structures of exploitation are formed and how they are rationalized.

In particular, we distinguished among three groups within the worker population: currently stationed workers in China (20), returnees (7), and those with repeated dispatch experience (3). This approach allowed us to capture both the continuity and changes in their experiences before, during, and after dispatch. As a result, we were able to trace how initial expectations, on-site experiences, and post-return perceptions evolved across different phases of the dispatch process.

We also categorized the managers into three distinct groups for analysis: senior officials in North Korea responsible for dispatch decisions (3), North Korean field managers overseeing workers on site (3), and local Chinese managers in charge of employment and factory operations (2).

Through this multi-layered categorization and comparative analysis, the report goes beyond documenting isolated incidents of abuse. It examines the structural mechanisms of forced labor, as well as the justification narratives employed by states, corporations, and individual managers. This approach reveals that forced labor is not a series of isolated events, but a recurring and institutionalized system of control.

I North Korean Overseas Workers Why They Deserve Global Attention

North Korean workers are employed in Chinese seafood processing factories. But these factories are not ordinary workplaces. They are spaces defined by surveillance, control, wage exploitation, violence, and sexual abuse. Workers endure nearly 14 hours of labor a day under the pressure that escape could mean death. For them, the factory feels more like a prison than a workplace.

According to findings from The Outlaw Ocean Project,²⁾ a U.S.-based nonprofit investigative journalism organization, 17 out of 20 female respondents reported having experienced sexual assault as of 2023. These women testified that “life inside the factory is even harder to endure than life in prison.” Their testimonies reflect not only the severity of the labor itself but also the pervasive violence and control embedded in daily life inside these facilities.

This labor environment reflects more than just poor working conditions; it embodies a system in which workers’ autonomy and human dignity are fundamentally denied. North Korean workers are dispatched abroad under state-organized mobilization as a means of earning foreign currency, a process that is inherently coercive and non-voluntary. In particular, female workers are exposed not only to physically demanding labor but also to constant surveillance, threats, and even sexual exploitation conditions that clearly meet the key criteria of forced labor as defined by the international community.

To become an overseas worker, a North Korean individual must first pass a rigorous selection process administered by the state. The government evaluates candidates based on political loyalty, regional origin, and family background. Informal channels involving bribery and personal connections are widely used during this stage, making the process opaque and susceptible to corruption. As

2) The Outlaw Ocean Project is a nonprofit journalism organization based in Washington, D. C., that produces investigative reporting on issues related to human rights, labor, and the environment.

12 Exploitation, Control, and Accountability Inside Chinese Seafood Packaging

a result, overseas deployment is often regarded as both a state-granted privilege and a personal opportunity, yet in reality, it cannot be considered a voluntary choice.

Once selected, workers leave the country with valid visas and passports, but these documents are confiscated immediately upon arrival in the host country. Afterward, their movements outside the workplace are heavily restricted, and all means of communication with the outside world such as phones and internet access are entirely blocked.

Wages are also not fully paid. The vast majority of workers' income is deducted under various pretexts, including electricity bills, housing costs, food expenses, and so-called "loyalty funds." Ultimately, workers receive only about 10 percent of their nominal earnings. While this arrangement is technically categorized as "paid labor," in practice it constitutes an exploitative system that offers almost no material benefit to the workers.

For female workers, the situation is especially severe with regard to sexual exploitation. Sexual harassment and assault by supervisors are reportedly widespread. Notably, during the COVID-19 period, there were specific testimonies indicating that some women were coerced into prostitution.

The supervisor forced us to perform sexual services every night during the COVID-19 period and pushed us to earn money through it.

[Testimony from a North Korean Worker]

What is even more alarming is that the profits earned through prostitution were reportedly confiscated by North Korean authorities. This reveals a disturbing reality in which sexual exploitation is not merely an individual criminal act, but a state-organized mechanism used as a means of control and revenue generation.

Seafood processed by North Korean workers under such forced labor conditions is exported worldwide, including to the United States and South Korea. This means that the products of exploitation are directly linked to our dining tables and everyday lives.

Seafood products processed by North Korean workers in Chinese factories have been exported to numerous countries, including the United States, Canada, Spain, Italy, Poland, Portugal, Puerto Rico, and South Korea. This indicates that the issue of forced labor is not confined to a specific region, but is deeply embedded in global supply chains.



The map above illustrates how seafood products processed in Chinese factories are distributed around the world. At least 15 countries, including South Korea, the United States, Canada, and major European nations, import these products, which include squid, pollock, snow crab, and blue crab. Although these items are processed in facilities where labor exploitation has been documented, they are simply labeled as “Made in China,” making it difficult for consumers to recognize the exploitative conditions behind their production.

This indicates that the issue of forced labor is not confined to a single region,

14 Exploitation, Control, and Accountability Inside Chinese Seafood Packaging

but is embedded throughout global supply chains as a structural problem. In particular, because these seafood products are labeled only as “Made in China,” consumers may unknowingly become directly or indirectly complicit in the outcomes of exploitation, without any awareness of the underlying human rights violations.

According to data obtained by the Chosun Ilbo and The Outlaw Ocean Project from Sayari, a U.S.-based firm specializing in financial sanctions and supply chain analysis, approximately 4,360 tons of China-labeled seafood products produced by North Korean laborers were distributed to 36 South Korean companies between 2021 and 2023.³⁾ The products include pollock, salmon, clams, and dried pollock strips, and have been distributed nationwide through large supermarket chains and seafood markets. The packaging simply bears the label “Product of China,” concealing the human rights abuses behind it. The issue goes beyond violations of labor rights. The foreign currency earned by these North Korean workers ultimately flows into the regime’s coffers, supporting its system of control. This constitutes a clear violation of United Nations Security Council sanctions against North Korea.⁴⁾

Despite continued criticism from the international community, the North Korean authorities have shown no intention of abandoning the practice of earning foreign currency through forced labor. According to Daily NK sources, the regime maintains a stance that it has done nothing wrong.⁵⁾ In fact, as of May

3) Minseok Lee, “[Exclusive] Chinese Seafood Made with North Korean Forced Labor Entered South Korea by the Thousands of Tons,” Chosun Ilbo, June 25, 2024. (Accessed May 8, 2025, <https://www.chosun.com/international/us/2024/06/25/F6M64CLLK5HXZM2J32MO450KA4/>)

4) In response to North Korea’s nuclear tests, the United Nations Security Council adopted Resolution 2375 in September 2017, which prohibited all UN member states from granting work authorizations to North Korean laborers. Later that year, Resolution 2397 was adopted, requiring the repatriation of all North Korean workers abroad by December 22, 2019. However, evidence suggests that some countries, including Russia and China, have continued to employ North Korean workers despite these binding resolutions.

5) Sangyong Lee, “China’s Seafood Factories Rely on North Korean ‘Slave Labor’ While Struggling to Minimize Economic Damage,” Daily NK, April 19, 2024. (Accessed May 31, 2025, <https://www.dailynk.com/20240429-1/>)

2025, additional reports suggest that North Korea is preparing to dispatch a large number of workers abroad, using superficial compliance to deflect international scrutiny on human rights issues.⁶⁾

This report offers a critical examination of North Korea's systematic response to international condemnation, which continues unabated despite mounting scrutiny. It traces, in detail, the process by which North Korean workers are selected and dispatched abroad, as well as the ways in which they are systematically exploited on-site.

Furthermore, the report underscores that this exploitation is not a localized or isolated issue within North Korea, but a transnational concern intricately tied to global supply chains.

6) 데일리NK 기획취재팀, “[그물에 갇힌 인권] 노동자 대거 파견 준비…인권 지적 눈가림”, 데일리NK, 2025.05.31.(검색일: 2025년 6월 2일, <https://www.dailynk.com/20250531-2/>)

How Are North Korean Workers Being Exploited?

1. Deployment Process: The Starting Point of Forced Labor

The process by which North Korean workers are dispatched to seafood processing factories in China can hardly be considered a voluntary employment procedure. Selection is based heavily on political loyalty, family background, and regional origin, and the screening process is often accompanied by bribery and the exchange of favors. In some cases, there are suspicions that female workers are selected for the purpose of sexual exploitation. This dispatch process marks the starting point of a system that leads directly to forced labor.

(1) Workers' Perspective: Bribes for Selection and Sexual Humiliation

① No one gets selected without paying a bribe.

Being dispatched to a seafood processing factory in China is not as simple as applying for a job. North Korean workers must first pass a selection process based on political criteria such as "loyalty" and "diligence." However, these factors alone are not enough. Money—in the form of bribes—plays a decisive role.

To get their paperwork approved, workers offer bribes to the local party officials in charge of the selection process. While some of these bribes end up in the pockets of the officials directly involved, a significant portion is often passed up the chain to higher-ranking cadres. As a result, many workers are forced to prepare bribes without knowing how much is needed or to whom it is ultimately going.

This structure has become a normalized and quasi-official procedure. Without paying, one's documents are unlikely to be approved, leading to disqualification from overseas dispatch. Conversely, there is a widespread belief that those who do pay are entitled to a guaranteed result.

[Reported Bribe Recipients and Details from Worker Testimonies]

Excludes 3 non-respondents

Bribe Recipient	Bribe Details
Cadre Guidance Officer	1,000yuan
Primary Party Secretary of the People's Committee, Cadre Guidance Officer	30kg of gasoline, dog, cigarettes
Cadre Guidance Officer	\$300 and other errands
Unidentified person in Pyongyang	\$100
Primary Party Secretary, Cadre Guidance Officer	\$300
Factory Manager, Workers' Committee Chair, Party Official	Cigarettes, dog, 200yuan
a senior official approached through a manager	\$100, watch
Relative in City Party Propaganda Department	\$600
City Party Labor Organization Guidance Officer	No response
Provincial Party Organization Department Guidance Officer	\$300
City Party Guidance Officer	2.5 million KPW (approx.\$80)
Relative in City Party	\$500
Provincial Party Membership Registration Officer	\$500
Son of Provincial Party Guidance Officer	3,000yuan
City Party Cadre	\$500
Provincial Party Cadre Department	12 million KPW (approx.\$400)
Provincial People's Committee Guidance Officer	\$600

Dispatched workers were systematically required to offer bribes to various officials and supervisors during the overseas deployment process. The recipients ranged widely from primary party secretaries and officials from the People's Committee to city- and provincial-level party cadres. The bribes included not only cash but also material goods such as cigarettes, dogs, watches, and gasoline. Reported amounts varied from 1,000 RMB to over 600 USD, and in some cases, the bribes were delivered in stages to multiple officials.

18 Exploitation, Control, and Accountability Inside Chinese Seafood Packaging

I personally gave a bribe to the supervising officer, but I couldn't deal with the higher-level cadres myself, so the officer handled it on my behalf. For example, I gave the officer \$200 directly. Since he took that money, he had no choice but to make sure my documents were approved. If he failed to do so, he would have to give the money back. [Testimony from a North Korean Worker]

This testimony is not merely an account of bribery. It reveals not only that the worker paid a bribe, but also that they believed approval should be guaranteed as a matter of course because the money had been paid. This illustrates how bribery functions as a kind of informal guarantee fee.

Considering that a newly recruited North Korean worker earns approximately 30,000 North Korean won⁷⁾ per month equivalent to about one U.S. dollar the \$200 bribe paid for overseas dispatch represents an enormous sum.⁸⁾ From the worker's perspective, this amount corresponds to roughly 16 years' worth of wages.

In the end, workers begin their overseas deployment already in debt, making early return or escape virtually impossible. Bribes do not function merely as fees for passing the selection process; rather, they serve as structural shackles that bind workers psychologically and financially.

Many workers testified that they had no choice but to borrow money from family or acquaintances, or resort to high-interest loans, in order to pay these bribes. They incur debt just to secure a job, and once in China, most of their wages are confiscated by the state or their supervisors. From the very beginning to the end of their deployment, workers are trapped in a structure of economic loss. Exploitation begins the moment they cross the threshold of selection.

7) According to a Daily NK investigation, the North Korean won–U.S. dollar market exchange rate was reported at 30,700 won per dollar as of July 5, 2025. Seulgi Jang, “‘Inflation Shock’ Incoming? Rice Prices Reach 13,000 Won, Dollar Breaks 30,000-Won Mark,” *Daily NK*, July 10, 2025. (Accessed July 10, 2025, <https://www.dailynk.com/20250710-1/>)

8) For the most recent information on wages of North Korean workers and officials, see the following Daily NK report: Seulgi Jang, “[Wage Increase ①] Monthly Pay Has Risen Twentyfold, but Payments Remain Inconsistent,” *Daily NK*, February 28, 2025. (Accessed July 10, 2025, <https://www.dailynk.com/20250228-1/>)

② Enduring Sexual Humiliation to Obtain an Evaluation Report

To be dispatched to China, North Korean workers must first obtain a document called a “life evaluation report”. This document serves as a type of character reference, in which a workplace supervisor evaluates the worker’s loyalty and diligence. However, the process of obtaining this document is often distorted. For many female workers, it is not merely an administrative step but a degrading and humiliating experience.

Some senior officials exploit their authority to issue this document by making sexually suggestive remarks or initiating inappropriate physical contact. They test whether the worker is “prepared to offer her body” in exchange for the document. What may begin as jokes or innuendo can escalate into coercive behavior.

To go to China, we need to get a life evaluation report from our workplace. During that process, they would make sexual comments and grope us under the pretense of joking around. If I tried to brush it off, they would say things like, ‘How can you expect to get a good evaluation if you’re not even willing to offer your body?’ and then they would become forceful. [Testimony from a North Korean Worker]

This testimony reveals that what workers face goes beyond mere discomfort. It shows that certain conditions are implicitly imposed, as if sexual compliance were an unspoken prerequisite for receiving the document. This is not a matter of individual misconduct but a manifestation of systemic exploitation.

What is more troubling is that these incidents are widespread but rarely addressed. Many workers choose to remain silent or blame themselves, fearing retaliation if they speak out. As a result, a disturbing reality has taken root, in which enduring sexual humiliation has become an almost unavoidable step in the path to overseas deployment.

(2) Managers' Perspective: Control and Informal Bribe Collection

① Defection Is a National Disgrace

North Korean workers dispatched to China are not allowed to possess their own personal identification documents, such as passports or travel permits. This is not merely for administrative convenience. Managers confiscate all documents in order to prevent the workers from escaping or making contact with the outside world.

According to the managers, this control measure is not only about preventing escape. It is also a strategy to avoid "national disgrace." If a worker defects and comes into contact with foreign media or South Korean institutions, the realities of North Korea's human rights abuses and forced labor could be exposed to the outside world. Such exposure is considered a humiliation for the North Korean regime, and managers see it as their absolute duty to prevent it.

We implement strict control because the risk of escape is high. In places like Shenyang, where there are many workers, it becomes difficult to locate anyone who flees or disappears. So this control is a form of prevention. If someone defects and gives an interview to foreign media, embassies, or puppet South Korean spies, it would cause irreversible international embarrassment. That's why we have a firm directive not to give workers any personal documents that could identify their nationality. [Testimony from a North Korean Manager

Such control effectively denies workers not only their freedom of movement but also their freedom of expression.⁹⁾ Labor performed under conditions in which personal freedoms are entirely stripped away can clearly be classified as forced labor. In particular, the fact that such document control is not left to

9) According to Daily NK reporting, an in-depth investigation into seafood processing factories in China confirmed that North Korean workers dispatched to these sites operate under conditions of complete isolation from outside information. Daily NK Investigative Reporting Team, "[Trapped in the Net of Human Rights] North Korea Strictly Enforces the 'Three Evil Laws' Even on Dispatched Workers," *Daily NK*, October 31, 2024. (Accessed June 2, 2025, <https://www.dailynk.com/20241031-6/>)

managerial discretion but mandated by higher authorities indicates that North Korea’s overseas labor system is not simply a dispatch mechanism it is a surveillance and control-oriented structure.

② Informal Bribe Transactions: Officially Prohibited

According to local managers, North Korean authorities officially prohibit bribery. In fact, Article 270 of the North Korean Criminal Law (Crime of Bribery) stipulates that “officials” who accept large or especially large amounts of bribes may be sentenced to more than 10 years of reform through labor. Likewise, Article 234 of the Administrative Penalty Law (Acts of Bribery) outlines a range of disciplinary actions, including warnings, dismissal, and removal from office.

Legal Provision	Clause Content
Criminal Law (2023), Article 270: Crime of Bribery	<p>A person who receives a large amount of bribes shall be sentenced to reform through labor.</p> <p>If the bribe is exceptionally large, or if an official receives a large bribe, the sentence shall be up to five years of reform through labor.</p> <p>If an official receives an exceptionally large bribe or engages in illegal acts in exchange for such a bribe, the sentence shall be five to ten years of reform through labor.</p> <p>In especially severe cases, the sentence shall exceed ten years.</p>
Administrative Penalty Law (2022), Article 234: Bribery Acts	<p>A person who receives a bribe may be subject to a warning, severe warning, or up to three months of unpaid labor or re-education through labor.</p> <p>In serious cases, the penalty may be more than three months of unpaid labor, re-education through labor, demotion, dismissal, or removal from office.</p>

Despite official prohibitions, informal bribery is widespread in the dispatch process. In practice, informal transactions are routine in the labor dispatch process. While officials may appear to follow regulations on the surface, many

22 Exploitation, Control, and Accountability Inside Chinese Seafood Packaging

of them privately accept bribes from prospective workers or their families in exchange for favorable placement in the dispatch order or assignment to preferred locations.

The problem lies in the lack of consistency or transparency in these dealings. Decisions regarding dispatch eligibility are often influenced by a worker's family background, political loyalty, or personal ties to officials, rather than objective criteria. As a result, some workers succeed only after considerable difficulty, while others pass through the process with relative ease, depending on their connections or financial means.

This opacity and informality reveal that the overseas dispatch process is far from fair or equitable. Even the mere perception that dispatch decisions may be swayed by bribery, political credentials, or financial status fosters deep mistrust and anxiety among workers. This distrust is a crucial indicator of the structural coercion inherent in the forced labor system.

People want to go abroad themselves or send their children overseas, even if it means getting just a single \$100 bill in return. That's why bribery circulates. But officially, it's strictly forbidden. So cadres won't take money from strangers. They first assess whether someone can be trusted to keep quiet, then decide whether to accept bribes.

[Testimony from a North Korean official]

What stands out in particular is the stark contrast between the testimonies of workers and those of officials.

Workers consistently stated that they had paid bribes to be selected for overseas dispatch, whereas one official claimed, "We never accept money from people we don't know. We only accept bribes from those who know how to keep their mouths shut." This contrast suggests that while bribery is indeed practiced, its scope and application are entirely dependent on internal power dynamics and relationships.

Ultimately, the very existence of bribery is not simply a matter of corruption,

but a structural issue that limits workers' ability to make voluntary choices. At the narrow threshold of overseas dispatch, workers without money, loyalty credentials, or personal connections find themselves excluded from consideration altogether. And once a worker has paid a substantial bribe and secured a placement, the financial burden makes it even more difficult to abandon the job or attempt escape midway through the contract.

In truth, returning home is never a viable option. Those who go back empty-handed must still face the debt they owe and the expectations of their families. For them, escape or early termination is not even a conceivable choice.

To build the necessary combination of money, loyalty, and networks, workers must mobilize not only their own resources but also those of people around them. Even after securing a dispatch position, they may find themselves trapped in their host country, unable to return home because of the debts they owe and the favors they must repay.

2. Wage Exploitation: A System That Denies Workers the Full Value of Their Labor

(1) From the Workers' Perspective: A Reality Where They Cannot Keep What They Earn

① Promised Wages Are Not What They Actually Receive

According to a labor contract obtained by Daily NK, the daily wage is stated as 130 RMB. Considering that North Korean workers typically work more than six days a week, this should translate into a monthly wage of at least 3,000 RMB.

However, the amount workers actually receive is drastically different. In most cases, the net amount paid to the workers is as low as 500 to 600 RMB per month. This means over 80 percent of the total wage is deducted under the pretext of being "the state's share."

24 Exploitation, Control, and Accountability Inside Chinese Seafood Packaging

Moreover, the terms of the contract are not explained in detail to the workers. As a result, most workers learn about their wages only through rumors and have no clear understanding of the actual payment structure.

I heard from others that the factory pays over 3,000 RMB, but what I actually get is just 300 to 500 RMB, and sometimes 800 RMB at most. Seventy to eighty percent goes to the state. Even after freezing in the cold or working in the heat, soaked in sweat, I only get 10 to 20 percent. It's so frustrating and infuriating. I've wanted to argue and demand more money a hundred times, but I hold it in because I'm afraid I'll be the only one sent back. [Testimony from a Worker]

This worker suspects that the factory pays more than 3,000 RMB per month and vividly describes the stark contrast between that amount and what they personally receive. Their testimony underscores the lived reality that the majority of their earnings are appropriated by the state.

[Perceived Wages vs. Actual Wages Received by Workers]

Excludes 2 Non-Respondents

Reported Wages (Testimony-Based)	Actual Wages
1,000yuan	150yuan
500~1,000yuan	100~200yuan
900yuan	200yuan
500yuan	100~200yuan
1,000yuan	200yuan
1,500yuan	700yuan
1,800yuan	800yuan
2,000yuan	900yuan
2,000yuan	400yuan
2,000yuan	500yuan
2,000yuan	300~800yuan
-	500yuan
1,000yuan	500yuan
-	500yuan
3,000yuan	300~500yuan
-	600yuan
2,000yuan	500~800yuan
-	500yuan
Contractual Monthly Wage: 3,120 yuan (130 yuan per day × 24 working days per month)	

This structure illustrates a textbook case of wage exploitation faced by North Korean workers, as revealed by the stark disparity between the wages stipulated in the contract and the actual amounts received. On paper, the workers appear to be earning substantial sums, but in reality, they are left with wages so low that even basic subsistence becomes difficult. This is not a matter of ordinary deductions or taxation, but rather a component of a systematically designed exploitative scheme.



A survey of 20 North Korean workers revealed a stark disparity between what they were told they would earn and what they actually received. On average, the workers believed their monthly wage would be around 1,500 yuan, but in reality, most received only about 600 yuan. Many earned less than 500 yuan per month, and the actual average payment amounted to less than 20 percent of the wage specified in their contracts.

This gap is not the result of taxes or one-off deductions. Rather, it reflects a structural system in which most of the workers' wages are automatically withheld under various labels such as "state plans," "loyalty funds," "patriotic contributions," and "holiday assignments."¹⁰ Workers themselves are not given

10) According to Daily NK sources, North Korean overseas workers are required to contribut

26 Exploitation, Control, and Accountability Inside Chinese Seafood Packaging

any breakdown of these deductions. In effect, their earnings are not determined by how much they produced in the factory, but by how much the authorities decide to leave them with.

The wage data presented here illustrates the abnormal structure of North Korea's overseas labor system. It is empirical evidence that North Korean workers are denied the right to fair compensation for their labor, which constitutes a key indicator of forced labor.

What is even more significant is that the workers never receive their full wages at any stage of the process. Deductions are made repeatedly—by the managers, to meet the foreign currency quotas imposed by Pyongyang, and for various loyalty fees and holiday expenses. In the end, only a tiny fraction of their earnings ends up in the workers' hands.

North Korean workers go abroad with the hope of earning a better living. But in reality, they rarely even see the money they've earned. Silenced by fear of being sent back to North Korea, they endure in silence. It is a system where they work, but never get paid.

② **Workers are made to feel grateful just for receiving any wages at all.**

North Korean workers have no idea how much they have earned or how much they will be paid. No explanation is given for reductions in their wages or the criteria behind such decisions. In some months, they receive almost nothing, with vague justifications like "national tasks have increased." During the COVID-19 pandemic, there were cases where workers received no wages at all.

e to a monthly "foreign currency loyalty quota." In addition, extra payments are demanded for national holidays and events such as the renovation of the Kumsusan Palace of the Sun, the Day of the Shining Star (February 16), and the Day of the Sun (April 15). Testimonies indicate that approximately 70 percent of their total earnings are surrendered under these various state-imposed plans, with workers also expected to cover the cost of holiday events out of their own pocket. Daily NK Investigative Reporting Team, "[Trapped in the Net of Human Rights] Foreign Currency Exploitation Continues in 2025," January 31, 2025. (<https://www.dailynk.com/20250131-7/>)

Over time, this situation dulls workers' sense of entitlement, to the point where they feel "lucky to receive anything at all." Wages, which should be a basic right, are instead perceived as a "privilege" to be thankful for.

My monthly wage ranges between 500 and 800 yuan, with an average of about 500. During COVID, I sometimes didn't receive any money at all. There were so many national tasks assigned by the state that it felt unfair, but given those experiences, I now feel lucky even to receive a little. When the wage is lower than usual, it usually means there were more state-imposed tasks that month.

[Testimony from a North Korean Worker]

Wage payments are adjusted arbitrarily, with no clear standard, and workers are simply notified of the results. They are not given the chance to question or protest. The only explanations offered are vague ones, such as "there were many national tasks this month" or "this is the amount designated by the Party." There is no reference to contract terms or performance-based incentives. Workers do not know how much they earned, nor can they assess whether what they received was fair.

Ultimately, wages become not a rightful reward for labor but a discretionary "benevolence" handed down from above. This reflects a total lack of transparency and predictability in wage distribution, and it exposes the structural inequality that prevents workers from asserting their rights. This is the true tragedy of North Korea's overseas labor system.

③ **The Signature Means Nothing. Wages Are Not Guaranteed.**

North Korean workers are required to sign monthly records listing how many days they worked and how much they were supposedly paid. On the surface, this appears to be a formal procedure confirming wage payment and contractual agreement. In reality, however, signing the ledger does not mean the workers actually receive any wages. There is a signature, but no pay. It is nothing more than a hollow, bureaucratic formality.

28 Exploitation, Control, and Accountability Inside Chinese Seafood Packaging

Workers describe these signatures not as proof of payment, but as a means of control by the managers. These documents are designed to create the appearance of legality, not to protect workers' rights.

I saw the ledger where our living expenses were recorded, and I signed it. But I didn't get paid. The document listed individual names and work details. On the far right, there were signature boxes for the worker, the team leader, and the manager. Inside, it had fields for ID number, date, type of work, performance, and remarks.

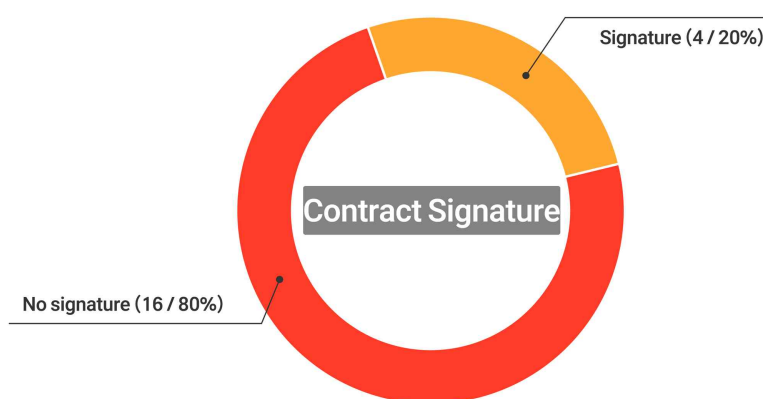
[Testimony from a North Korean Worker]

Contracts that omit key labor conditions such as working hours, wages, and rest periods present a serious concern. Without these clauses, workers have no legal grounds to defend their rights or challenge mistreatment. In this context, signing a ledger serves not as a safeguard but as a tool that legitimizes exploitation.

There's no way they'd ever show us the contract between the companies. I never signed anything.

[Testimony from a North Korean Worker]

[Contract Signature Status]



Most workers testified that they never signed anything at all. In fact, 16 out of the 20 workers interviewed (80%) stated they had never signed a contract or a ledger recording their living expenses. Only 4 workers (20%) reported signing any documents, and even in those cases, they did so without being fully informed of the terms of employment.

In North Korea, we don't even know what a contract is. Once we arrived at the factory in China, we all signed something, but the content wasn't explained in detail and we never received a copy. Most of the contract terms were just conveyed to us verbally.

[Testimony from a North Korean Worker]

This shows that the contract holds no real legal force. The documents exist merely for appearances and offer no genuine protection of workers' rights.

(2) Manager's Perspective: Formalized Contracts and Revenue Collection Structure

① Most of the Earnings Go to the Homeland

Managers explain that the reason North Korean workers receive such low wages is that, although wages are specified in the contract, they are often adjusted on site. In practice, the majority of the revenue is remitted to the North Korean authorities under the label of "state-planned contributions."¹¹⁾ In other words, the money earned by workers through their labor does not go directly to them but is diverted as a means for the state to earn foreign currency.

Wages are adjusted based on the contract with the Chinese company, the region, and the season. According to North Korean standards, there is usually no fixed amount. Instead, the rule is to go on-site

11) According to an internal source at Daily NK, institutions involved in the dispatch of overseas workers have even announced a directive stating that individuals with a history of failing to meet their "state-planned contribution" quotas will be strictly excluded from future overseas assignments. Taejoo Chung, "Directive Issued: 'Strict Restrictions on Overseas Dispatch Opportunities for Those Falling Short of State Quotas'", Daily NK, March 26, 2024 (accessed June 5, 2025, <https://www.dailynk.com/20240326-1/>)

30 Exploitation, Control, and Accountability Inside Chinese Seafood Packaging

and exceed a certain target, and most of the revenue is remitted to the Ministry of Fisheries. [Testimony from a North Korean Manager]

This testimony clearly demonstrates that the issue of North Korean overseas labor is not a matter confined to individual companies, but a state-led structure of wage exploitation. The manager's own statement that "most of the revenue is sent to the Ministry of Fisheries" supports the conclusion that the North Korean authorities systematically collect foreign currency through a centralized mechanism.

This reveals a structural exploitation system in which the state utilizes overseas workers as instruments of foreign currency generation and strictly controls and recovers the payment for their labor. Such a method of exploitation constitutes a clear violation of the International Labour Organization (ILO) standard requiring the direct payment of wages. The fact that workers do not receive the remuneration they have earned is a definitive indicator of forced labor and represents institutionalized exploitation. Despite the fundamental principle that wages must be paid directly to workers, this principle is thoroughly disregarded in practice.

② We explained the contract and obtained their signature.

Managers testified that they explained the contract terms in a way workers could understand.

We explain in detail the wage, working hours, and labor allocation to the workers. The Dandong factory is unique in that the intensity of seafood processing work is not constant, so we make sure the workers fully understand the flexible conditions specified in the contract and obtain their signature to confirm agreement.

[Testimony from a North Korean Manager]

This statement is intended to support the argument that workers were fully aware of the contract terms in advance and voluntarily agreed to them. In particular, the term "flexible conditions" implies that work conditions may shift

unpredictably, often to the workers' disadvantage, depending on the directives of North Korean authorities or local officials. While the managers assert that a signed contract eliminates any issue, in reality, the authenticity and substance of that consent are questionable.

Furthermore, there is testimony that actual contracts and documents are not disclosed without prior approval from central or local Party officials and that only limited information is shared with ordinary workers.

All documents must receive final approval from Party officials at the central, provincial, municipal, or county (district) level. Workers are only provided restricted information. They are not supposed to know everything, as these are considered internal documents.

[Testimony from a North Korean official]

Under such circumstances, it is difficult to determine whether workers had full comprehension of the contract terms, or whether those terms were honored in practice. In fact, many workers testified that they were not informed of the contract conditions in advance and had never received a proper explanation. Although managers claim they explained the "flexible conditions" in detail, forcing workers to accept excessive labor without fair compensation or arbitrarily violating agreed terms constitutes a clear case of forced labor. In an environment where conditions are constantly shifting, the validity of workers' consent especially to disadvantageous terms remains structurally suspect.

③ The contract was concluded based on Chinese law.

The Chinese factory side states that "North Korean workers are also contracted according to Chinese labor law standards." On the surface, it appears as if the law is being followed, but in reality, it is unclear to what extent those standards are actually upheld.

We pay according to China's wage and labor law standards.

[Testimony from a North Korean Manager]

Although they claim to use the law as a standard, it is questionable whether that law is actually applied in the workplace. In fact, Article 48 of China's Labor Law enforces a minimum wage system, and the monthly minimum wage ranges from 1,690 to 2,690 yuan, with Guangxi Province at the lowest end and Shanghai at the highest.¹²⁾

However, the actual wages received by North Korean workers, as confirmed in the investigation, averaged only 600 yuan per month, which is merely 22 percent of the minimum wage in the Shanghai area. This shows that, in reality, the contract claiming compliance with Chinese labor law serves only as an external justification, while an exploitative structure that does not conform to local laws remains firmly in place.

④ Wages Are Transferred to Accounts Designated by North Korea

North Korean workers toil all day, but they do not receive their wages directly. The Chinese factories transfer the full amount specified in the contract to an account designated by North Korean authorities, with no direct payment to individual workers. These funds are then managed and distributed by North Korean administrative agencies, but no one knows how much actually reaches the workers' hands. This structure clearly violates the principle of "direct wage payment," as defined by both International Labour Organization (ILO) standards and Chinese labor law.

The contracted amount is paid in a lump sum to a North Korean-designated account, not directly to the workers. The payment is mostly transferred through foreign currency accounts in China, or in some cases, handed over in cash to North Korean supervisors, who then deliver it to North Korea.

[Testimony from a North Korean Worker]

12) Ministry of Human Resources and Social Security of the People's Republic of China (as of April 1, 2025) (Accessed on May 8, 2025, <https://www.mohrss.gov.cn/hsearch/?searchword=%E6%9C%80%E4%BD%8E%E5%B7%A5%E8%B5%84>)

The same applies to wage management. North Korean authorities may “record” wages in ledgers, but actual cash distribution does not take place. In the past, wages were provided in full to workers in the form of monthly living expenses. However, after a policy shift in 2012, the system transitioned to ledger-based accounting, and since early 2024, it has become standard practice to remit wages directly into the workers’ domestic bank accounts in North Korea. This change functions as a structural mechanism that allows the state to maintain complete control over the flow of wages.

Until 2011, all wages were paid to the workers monthly as living expenses. After a policy change in 2012, it shifted to a ledger-based system. Since early 2024, instead of carrying money back by hand, it has been deposited at customs, exchanged into North Korean currency, and then transferred directly into the workers’ domestic bank accounts.

[Testimony from a North Korean Worker]

In this way, North Korea thoroughly strips workers of their economic autonomy under the pretext that “the state will manage what you earn.” Despite their labor, workers are unable to control their own income and become further subordinated to the state. Ledgers may exist, but there is little money that workers can actually hold in their hands; all effective control lies with the authorities.

This structure violates the ILO’s Convention No. 95 on the Protection of Wages, particularly the principles of direct payment, regularity, and transparency. By using formal contracts to recover wages, the state constructs a mechanism that materially constitutes forced labor. “Wages that exist only on paper” are not mere administrative procedures; they are instruments for institutionalizing and concealing the exploitation of workers.

3. Sexual Exploitation

A Gendered Threat Targeting Female Workers

(1) From the Perspective of Workers

A Reality Where Refusal Is Not an Option

① Sexual exploitation is known, yet no one speaks of it

The issue of sexual exploitation is rarely visible. There are no official reports or documented records, and supervisors and managerial staff remain silent. Yet among workers, the existence of abuse is tacitly acknowledged. Survivors do not speak openly; instead, accounts are shared indirectly, through expressions such as “I heard something happened” or “There’s a rumor that she went through something like that.”

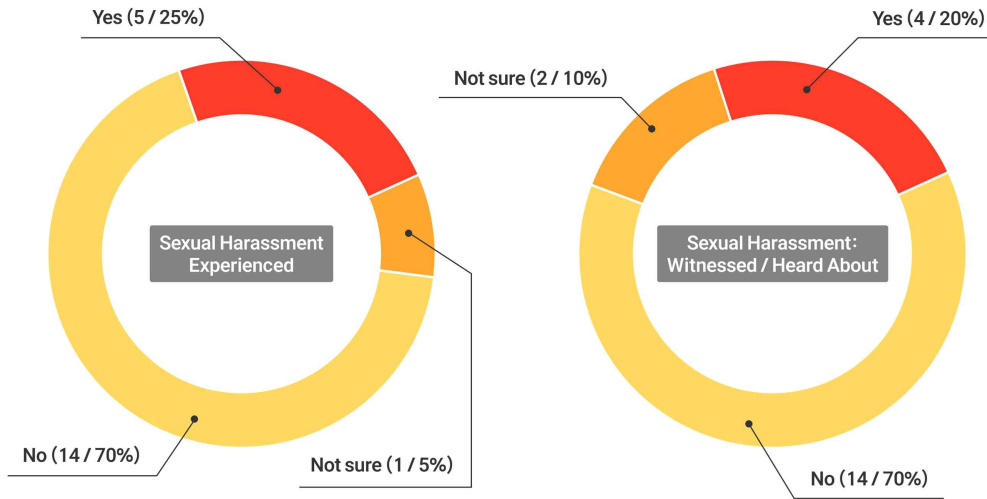
There were rumors that one of my colleagues tried to avoid a manager’s advances but eventually gave in. Most of the women go along without refusing. [Testimony from a North Korean Worker]

In this context, rumors become the most cautious way of expressing pain. Although direct references are avoided, the pressure and silence experienced by victims are implicitly understood and collectively internalized.

A similar atmosphere is also present during pre-dispatch training. One worker testified that it was common for male instructors to make sexual comments or physically touch female workers during training sessions.

They don’t demand sex, but they do make sexual comments. During training sessions held by the Ministry of External Trade, the instructor would say things like ‘Is it new or used?’ while nudging our breasts with his elbow... I don’t think there was anyone who didn’t hear things like that. [Testimony from a North Korean Worker]

[Sexual Harassment: Experienced, Witnessed, or Heard About]



This behavior goes beyond inappropriate comments. Through repeated contact and sexual innuendo in public settings, a culture is constructed in which female workers feel they cannot refuse. Victims rarely report such incidents out of shame or fear of retaliation. The collective silence, then, is not a matter of choice but the result of a systematically reinforced atmosphere.

Female workers especially internalize the belief that being dispatched overseas is directly tied to their family’s survival. Many have paid bribes or arranged favors in advance and feel psychologically pressured to go abroad in order to recover these costs. Under such circumstances, refusing a sexual advance is seen not merely as a personal decision but as a loss of everything. This psychological sunk cost effectively erodes any possibility of resistance.

As such, a sexual hierarchy is internalized from the very beginning of the dispatch process. It functions as a structural mechanism that exposes female workers to ongoing sexual threats upon arrival at the worksite. This coerced silence and forced compliance constitute clear violations of human rights and serve as preconditions for sexual exploitation.

② **Power inside the factory exploits sexual vulnerability**

In the seafood processing factories where North Korean workers are assigned, the authority of the managers is absolute. This power is not limited to instructions or evaluations, but also functions as a tool for exploiting the sexual vulnerability of workers. Female workers often remain silent or endure inappropriate behavior in order to avoid falling out of favor with the managers. Sexual harassment occurs routinely and is normalized within an atmosphere that does not even allow for the recognition that such behavior is unjust.

On holidays or the birthdays of women he likes, the manager eats and drinks with them, then grabs their breasts.

[Testimony from a North Korean Worker]

Another testimony reveals a more persistent and systemic form of exploitation. One worker explained that the factory manager closely monitors the women he “favors,” and those who give their bodies tend to receive more opportunities.

If the manager particularly likes certain women, he appoints deputy accountants or junior secretaries to control them and requires them to report directly to him. The ones who go into the manager’s office most often are those who have already given him their bodies. If you want to survive here until the end and earn more money than others, you cannot say no to the manager’s demands.

[Testimony from a North Korean Worker]

Those who refuse such demands often face immediate retaliation or punishment. Female workers who resist sexual advances may be reassigned to harsher tasks.

A coworker was called out by a manager at night and was almost raped. She managed to escape, but from the next day, she was made to handle frozen pollack, doing work so hard that she couldn’t even straighten her back. [Testimony from a North Korean Worker]

Inside the factory, managerial authority operates as a means to legitimize sexual domination. While formal rules appear to be in place, in practice, private authority enables systematic sexual exploitation of female workers. Those who

reject sexual demands are punished with excessive workloads or undesirable assignments. In more severe cases, they face constant threats of being forcibly repatriated under the pretext of having “damaged the nation’s earning enterprise.”

③ Prostitution as a Means to Fulfill Foreign Currency Quotas

Sexual exploitation of North Korean female workers cannot be dismissed as merely the misconduct of individual managers. In some cases, there is evidence that prostitution was coercively organized under the pretext of fulfilling “state quotas” during periods of underperformance in foreign currency earning. The term “quota” refers to the foreign currency revenue targets imposed by North Korean authorities on each overseas dispatch unit. Failure to meet these targets can result in political censure and personnel consequences for the responsible officials.

During the COVID-19 pandemic, when foreign currency earnings from Chinese factories declined, some local officials resorted to mobilizing female workers for prostitution in order to fulfill these quotas. The “quotas” in question were state-mandated foreign currency targets assigned to local cadres abroad.

During COVID, we suffered in agony because of this. The manager wasn't making enough money and couldn't meet the quotas imposed from above. So each month, he would take two or three women out under the excuse of 'relieving stress' and forced us to work as prostitutes. In the end, he turned in the quota money he earned from that and kept his position, while we suffered serious losses with no compensation. [Testimony from a North Korean Worker]

This testimony reveals that prostitution was not a voluntary or individual choice, but an act coerced by managerial orders and the systemic imperatives of the regime. Female workers were objectified against their will, and the proceeds of this abuse were sent directly to higher authorities. In this structure, the human rights of female workers were completely subordinated and exploited in the name of achieving state-mandated economic goals. This constitutes not only

sexual exploitation but systematic and organized abuse of human rights.

Crucially, such a structure may constitute a form of forced prostitution for economic profit an egregious human rights violation that falls under the international legal definition of trafficking in persons. The UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children (the Palermo Protocol) explicitly defines trafficking as including acts committed through coercion, threat, or abuse of power to obtain sexual services for financial gain. The testimony provided here offers clear evidence that prostitution was not a matter of personal choice, but a form of forced mobilization under the state's foreign currency quota system.

④ Refusing Sexual Advances Comes at a Cost

When female workers refused sexual advances from managers, they often faced more than just discomfort or awkwardness. Tangible penalties and punitive consequences frequently followed, indicating that the environment was one in which the "right to say no" effectively did not exist.

In some cases, wages were delayed or significantly reduced. In others, workers were denied access to basic necessities such as daily supplies and food. Job assignments were also weaponized those who refused were deliberately tasked with the most physically demanding or undesirable work.

Some of my coworkers who turned down a manager's request later had their wages delayed or cut significantly.

[Testimony from a North Korean Worker]

Those who refused were excluded from the distribution of daily goods, snacks, and fruits. They also had to work longer hours.

[Testimony from a North Korean Worker]

There's a friend of mine who refused a sexual request. She was reassigned from drying fish to the processing line, which is the hardest job in the factory. [Testimony from a North Korean Worker]

In this structure, the moment a worker says “no,” she must be prepared to endure economic and physical retaliation. Under such conditions, silence and compliance become the only viable survival strategies. The reality is that workers do not possess a meaningful right to refuse. The power held by managers is absolute enough to govern nearly every aspect of the workers’ lives.

This point is crucial: the presence of penalties does not merely serve as a form of punishment it actively conditions future compliance. The physical and psychological toll inflicted after a refusal creates heightened vulnerability, which managers then exploit repeatedly. Sexual exploitation here is not a one-time incident but part of a cyclical structure perpetuated through systemic control, economic dependency, and abuse of authority.

This is the core of the sexual violence embedded in North Korea’s overseas labor dispatch system. It is a structure in which power asymmetry, economic coercion, and institutional impunity intersect to make repeated exploitation possible, even inevitable.

⑤ No Sexual Misconduct Prevention Education Provided

Despite the fact that North Korean workers are structurally exposed to sexual exploitation, there is no formal education provided to prevent or respond to such abuses. In fact, every worker who responded to the survey stated that they had never received any training or education related to preventing sexual misconduct. This is not coincidental; it is the result of systemic neglect.

Managers do not treat worker safety as a priority. They make no visible effort to report incidents of sexual violence to higher authorities, nor to address the issue institutionally. Even when abuse occurs, there are no channels through which workers can report or raise the issue internally or externally. A culture of concealment, rather than prevention, has become the norm.

No. I don't think there are any instructions to provide education on sexual issues because the managers don't care about the workers' safety and sexual assault incidents are never reported to higher-ups.
[Testimony from a North Korean Worker]

This testimony reveals more than just the absence of sex education; it exposes a systemic refusal to acknowledge or treat sexual violence as a crime. It indicates an organizational attitude rooted in indifference and evasion of responsibility. North Korean workers labor under constant sexual threat and psychological stress, in an environment where they are left entirely unprotected with no one to turn to for help.

This is not merely a lack of education. It is an oppressive system that proactively prevents workers from accessing their rights, and that deliberately disables the very possibility of protection.

(2) From the Perspective of Managers Concealment, Suppression, and On-site Handling

① Managers Are Also Perpetrators

Sexual exploitation in these settings goes far beyond covert harassment. On-site supervisors particularly North Korean officials often abuse their authority over dispatched workers to commit direct acts of sexual violence. By threatening female workers with repatriation to North Korea, they suppress any exercise of free will and create a coercive structure of sexual subjugation in which refusal is not a viable option.

Even Chinese factory managers have acknowledged these abuses. Testimonies from local managers confirm that North Korean supervisors use their unchecked power to commit sexual crimes against female workers. These accounts serve as key external evidence that help corroborate the systemic nature of the exploitation.

Managers use their authority to threaten the workers with forced return to North Korea, inflicting sexual harm on them. If they want to, they can force themselves on women in places without cameras, regardless of the women's will. [Testimony from a Chinese Manager]

This statement carries particular weight because it offers an outsider's confirmation of what occurs within the labor sites. It demonstrates how the imbalance of power between managers and female workers operates in practice.

Crucially, this testimony suggests that such acts cannot be dismissed as the misconduct of a few unethical individuals. A structural system is in place in which managers who control workers' legal status, daily life, pay, and evaluations also exercise unchecked power over workers' bodies and rights. For these women, the manager is not just a supervisor or monitor, but also a potential perpetrator.

Under such power dynamics, workers cannot say "no" or file a complaint, even for basic self-protection. The threat of repatriation functions as an effective and devastating tool for enforcing sexual exploitation.

② Prevention Training Is Merely Formal The Structure of Sexual Exploitation Remains Intact

Managers claim that sexual violence prevention training was conducted before the workers' departure. They also emphasize that female workers are assigned to environments separated from male workers to minimize risks.

We received pre-departure training on how to prevent rape and physical crimes against female workers. In Shenyang, female workers are grouped and overseen by female mid-level managers, which limits contact with men. So I believe such problems are minimal.

[Testimony from a North Korean Manager]

However, the simple physical separation of male and female workers has no meaningful impact when the exploitation is rooted in hierarchical power structures. The core problem lies in the authority held by managers those who

42 Exploitation, Control, and Accountability Inside Chinese Seafood Packaging

have the power to access and abuse female workers. As long as individuals with that authority remain unaccountable, the structure of sexual exploitation persists. It is not an isolated issue, but part of a systemic pattern of oppression.

Workers themselves report that they “never received any such training” or that “raising sexual misconduct as an issue is simply not possible.” This discrepancy is not a matter of differing recollections, but rather clear evidence of a systemic failure: the mechanisms intended to protect workers do not actually function.

In the end, the managers’ claims of preventive training serve more as a means of deflecting responsibility than as evidence of real safeguards. These statements are used to justify and obscure the reality of sexual exploitation and institutionalized silence in the workplace. This is not merely a disagreement over whether training occurred it exposes the truth that the system has no genuine commitment to protecting the human rights of female workers.

③ **Policy Changes Have Been Introduced, but Their Effectiveness Remains in Question**

Both North Korean officials and Chinese managers stated that systems and guidelines exist to prevent sexual abuse. They claimed that contracts now include clauses to protect female workers and that mandatory sexual harassment prevention training and anonymous reporting systems have been implemented.

*All contracts now include provisions to protect female workers. (...)
Various measures have been put in place.*

[Testimony from a Senior Official Inside North Korea]

Our factory has made sexual harassment prevention training mandatory and introduced new guidelines to strengthen anonymous reporting systems and victim protection policies.

[Testimony from a Chinese Manager]

These statements suggest that some policy-level changes may have been attempted. However, the key issue is not the mere existence of such policies,

but whether they are actually implemented and enforced on the ground.

As previously discussed, every worker surveyed said they had “never received any training related to sexual issues,” and some who experienced sexual harm were repatriated without any protection or support.

In the end, the claim that protective policies exist is fundamentally different from the question of whether those policies actually protect women. The presence of a policy alone is not enough to measure effectiveness; field-based verification is essential to determine whether these measures are functioning in reality.

What is truly needed is not just documents and written rules, but a workplace environment where workers feel safe. Policies must respond to the voices of victims, and institutions must adapt accordingly. Only then can these problems be addressed in a meaningful way.

④ Victims Are the Ones Who Get Punished

Even when incidents of sexual abuse occur, on-site managers tend to prioritize keeping the matter quiet over protecting the victim. According to one official, while victims may receive some form of compensation or be separated from the perpetrator, it is common practice for the female victim to be repatriated, especially when the perpetrator is considered contractually important or indispensable for communication with external partners.

The victim is quietly compensated and protected without public disclosure. Separation measures are taken, or in severe cases, the victim is repatriated to the home country. (...) However, if the manager is not deemed highly dangerous and is especially needed in dealings with external parties, it is standard for only the woman to be sent back. [Testimony from a Senior Official Inside North Korea]

This practice effectively reinforces a structure where “the perpetrator stays while the victim is removed.” The person with institutional power remains

44 Exploitation, Control, and Accountability Inside Chinese Seafood Packaging

unaccountable, while the victim bears compounded disadvantages. Once repatriated, the victim not only loses her job but may also face stigma or additional repercussions after returning. Meanwhile, the perpetrator remains in place due to “contractual necessity,” with no formal disciplinary action, free to repeat the cycle of abuse.

This is not merely a case of institutional inaction, but a clear evasion of responsibility. It represents a systematic policy of enabling the reproduction of sexual exploitation. A system that prioritizes organizational stability and contractual maintenance over victim protection creates conditions that perpetuate abuse in a deeply structural way.

⑤ Sexual Exploitation Extends to Prostitution

Sexual exploitation of North Korean workers extends beyond workplace harassment or coercion. There are documented cases in which this exploitation escalates into prostitution involving external male clients. According to Chinese managers, in some sites, North Korean women are offered as sexual companions to outside individuals, with managers receiving payment in foreign currency in return.

I heard about it from people around me. In March 2024, a Chinese factory staff member offered 10,000 yuan to a North Korean manager in exchange for a woman, and the manager accepted the offer and took the money. The men making these requests are wealthy, and they pay the agreed amount. The woman who was sent for the night remained silent, so no problems arose.

[Testimony from a Chinese Manager]

There were rich clients who offered 5,000 yuan to bring North Korean female workers to drinking parties. The managers accepted, and because it's done quietly and discreetly, there are no incidents or complaints. [Testimony from a Chinese Manager]

This structure represents a dual layer of exploitation, where North Korean women are not only used as labor but also mobilized as tools for earning

foreign currency. The fact that these testimonies come from Chinese site managers lends external credibility and strongly suggests that such human rights violations are ongoing.

Unlike the COVID-era cases, where prostitution was coerced under the banner of meeting “state-assigned quotas” for foreign currency, the recent incidents reported since 2024 indicate a shift in character. In these newer cases, prostitution occurs in functioning workplaces in response to financial offers from Chinese clients, with North Korean managers privately profiting by exploiting their power. This points to a form of personalized sexual exploitation distinct from state-mandated operations revealing how systemic abuse enables individual actors to leverage power for personal gain.

These actions clearly fall under the definition of human trafficking as outlined in the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children (Palermo Protocol), particularly where exploitation occurs through abuse of power for profit. Moreover, they constitute one of the most severe forms of abuse under the International Labour Organization’s indicators of forced labor. At every level, the rights of female workers are disregarded. In such environments, silence and compliance are not choices they are survival strategies.

4. Detention and Control

Surveillance Through Movement Restrictions

(1) Workers’ Perspective: A Life Under Surveillance

① Those Who Run Are ‘Disappeared’

For North Korean workers unable to withstand the harsh labor conditions, attempting to escape is not merely an effort to return home it is treated as a serious offense against the regime. Those who attempt to flee are labeled as criminals, and once forcibly repatriated, their fate is often unknown. Fellow

46 Exploitation, Control, and Accountability Inside Chinese Seafood Packaging

workers describe them as having “disappeared” or “not returned home,” euphemisms that suggest they were punished upon return to North Korea.

There were two escapees one in February and one in May but both were caught and forcibly repatriated. After returning, they never made it back home. They just disappeared.

[Testimony from a North Korean Worker]

One coworker tried to escape in June 2023 but was caught and brought back to the factory. Later, that worker was quietly taken to the embassy office, and two days later, sent back to North Korea. I heard they never returned home after that. All of their earnings were confiscated. [Testimony from a North Korean Worker]

These cases reveal that North Korean workers abroad are not simply overseas employees they are, in effect, hostages under surveillance, subject to punishment at any sign of disobedience. The right to free movement is completely denied, and defying state orders can mean the end of one’s life as they know it. No one knows what happens after disappearance. No one dares to ask. Even before being recognized as workers with labor rights, they are stripped of the most basic human right the freedom of movement. This fundamental deprivation defines their very existence.

② Repatriation Means Punishment, and Surveillance Is the Norm

For North Korean workers, returning home does not signify the simple end of an overseas assignment. It is not a matter of completion or voluntary return. Acts such as disobeying managerial orders, voicing grievances, or engaging in any form of collective opinion-sharing are closely monitored and treated as threats to the regime. Such “collectivism” is perceived as a sign of political dissent. As a result, forced repatriation functions as a form of punitive action, with workers being sent back to North Korea not by choice, but by authoritative decree.

One of my coworkers was forcibly repatriated for confronting a manager and for expressing group complaints. I heard he was from Pyongyang and was reportedly expelled and investigated after returning. [Testimony from a North Korean Worker]

Following repatriation, additional investigations often occur, and in some cases, workers are reportedly banished even from their hometowns. These measures serve to enforce political loyalty among dispatched workers and encourage internalized surveillance in daily life. Recently, control measures have intensified under the so-called “Mass Reporting Law,” which encourages and even coerces workers to report one another.¹³⁾

Managers use the reporting system to sow distrust among workers, threatening them with labels like “spy” or retaliatory violence. This fosters a vicious cycle where workers, in fear of surveillance and reprisal, are driven to silence and withdrawal. Surveillance becomes not an exceptional measure, but a structured and normalized part of everyday life.

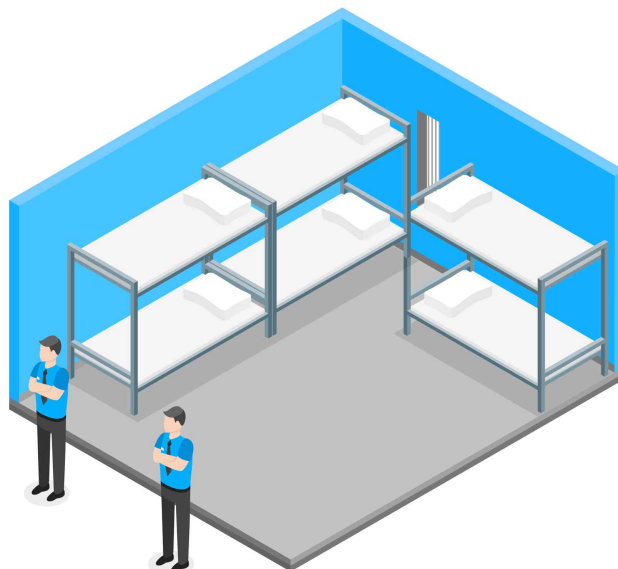
③ Surveillance is constant, and the factory feels like a prison.

For North Korean workers, daily life abroad resembles surveillance more than employment. They are constantly under watch, both inside and outside the factory, with no freedom to commute or leave their accommodations at will. Although they are officially dispatched as part of the state’s “foreign currency earning” mission, they feel as though they are being treated not as workers, but as criminals. Even outside of North Korea, they experience not liberation but a more deeply entrenched form of repression.

Our dormitory is inside the factory. Six people share a room of about 30 square meters, and the door can only be locked from the inside. Two guards rotate shifts to monitor us 24 hours a day from the hallway or from outside, watching for anyone leaving. [Testimony from a North Korean Worker]

13) DailyNK Investigative Team, “[Trapped in the Net of Human Rights] Threatened with ‘exposure as a spy’ and sexually assaulted,” DailyNK, Nov. 25, 2024. Accessed June 10, 2025. <https://www.dailynk.com/20241125-1/?tztc=1>

[Dormitory Illustration]



※This illustration is reconstructed based on workers' testimony and may not reflect the actual setting.

The placement of worker dormitories within the factory grounds, combined with blocked access to the outside world, clearly illustrates the severity of their confinement. A 24-hour surveillance system, shared dormitories, and a room layout that can only be locked internally reflect conditions closely resembling physical detention. This is not simply a matter of control; it is a system of structural oppression that deprives workers of both freedom of movement and personal privacy.

We feel like criminals. We came here to earn foreign currency for the country, but even in another country, the control is the same. It makes me feel bitter. [Testimony from a North Korean Worker]

It's disgusting. I often think, 'No matter where I go, it's like I can't escape this prison life. If only I had wings, I'd secretly fly away. I haven't committed any crime why do I have to live like this?'
[Testimony from a Returned Worker]

These testimonies show that the factory and dormitories are not merely spaces for work or rest, but isolated zones where movement and access to information are strictly blocked. These are not “workplaces” but prison-like environments, and the workers are not simply employees but subjects of constant surveillance.

(2) Perspective of the Managers

Any Contact with the Outside World Is a Threat

① The State Restricts Freedom of Movement

The statements of managers and officials are unequivocal: even after being dispatched abroad, North Korean workers are not free to move as they wish. Not only are outings prohibited without prior approval, but even personal movements must be authorized in advance. Every action is subject to surveillance by the highest-ranking local manager, who operates under the delegation of the Party and the State. This reveals that restrictions on movement are not simply site-level rules but part of a state-level, institutionalized control system.

All individual activities abroad are governed by internal regulations designed to be controlled through the highest local manager, who acts on behalf of the Party and the State.

[Testimony from a Senior Official Inside North Korea]

This testimony shows that local managers are not just supervisors issuing work orders. They are political overseers, entrusted by the Party and the State to control the lives of the workers. In other words, even when abroad, North Korean workers are not recognized as autonomous individuals. They exist solely as subjects whose behavior is permitted only within the limits defined by state command. A life without freedom of movement is not merely inconvenient it is a fundamental violation of human dignity and rights.

Moreover, this system of control suggests that North Korea does not treat overseas workplaces as merely foreign postings, but rather reconstructs them as

miniature North Korean societies. Workers live completely cut off from the outside world, within a structure of surveillance, reporting, and obedience. Factories and dormitories function as closed spaces of control, and the highest-ranking manager assumes multiple roles: administrator, political indoctrinator, and behavioral monitor. This means that North Korea's internal political-social control system is fully replicated beyond its borders.

② Defection Is Treated as a Criminal Act and Subject to Punishment

When a North Korean overseas worker attempts to escape, it is not regarded merely as a breach of contract or abandonment of post it is considered an act of rebellion against the state. From the moment of defection, the worker becomes subject to criminal punishment, and the response goes far beyond disciplinary action at the workplace. It triggers state-level intervention and punitive procedures.

In the event of a defection, it must be reported to the embassy and the homeland within 12 hours. The local Chinese public security bureau is contacted to apprehend the worker and arrange repatriation as swiftly as possible.

[Testimony from a Senior Official Inside North Korea]

Within 24 hours of occurrence, the case is reported to the homeland and the embassy. Cooperation is requested from relevant Chinese institutions to resolve the issue.

[Testimony from a Senior Official Inside North Korea]

Preliminary investigation begins immediately. Depending on the intent, the individual may be transferred to a managed area or placed under the jurisdiction of the Ministry of State Security.

[Testimony from a Senior Official Inside North Korea]

These statements reveal that North Korean authorities treat defection not as a mere violation of employment terms but as a disruption of national discipline and a political act of desertion. In the event of an escape, a centralized reporting system is activated within 24 hours, including notification to the North

Korean embassy. The Chinese public security bureau is enlisted to locate, arrest, and repatriate the individual without delay.

Once returned, the worker undergoes an initial investigation referred to as “preliminary examination” and, depending on the perceived intent behind the defection, the case is transferred to state-level political security institutions, such as the Ministry of State Security.

This entire process constitutes a state-orchestrated enforcement mechanism. The North Korean worker is not viewed as an individual who abandoned a job but rather as a perpetrator of anti-state behavior. In effect, the overseas labor deployment system operates under constant surveillance and punishment protocols, where workers are deprived not only of freedom of movement but also of the freedom to terminate their contracts.

Such a structure is a textbook example of what the ILO Convention No. 29 defines as forced labor: labor performed under the menace of any penalty and for which the worker has not offered himself voluntarily. Even in the absence of physical confinement, this system provides conclusive evidence of coercive labor practices.

5. Harsh Working Conditions: Inhumane Environment and Institutionalized Discrimination

(1) Workers’ Perspective

A Reality Where Overwork and Silence Are Enforced

① Verbal Abuse and Humiliation Are Part of Everyday Language

North Korean workers at Chinese seafood factories are constantly subjected to verbal abuse and humiliation. While physical violence may not occur frequently, verbal assaults are deeply entrenched in the workplace culture and often treated as a form of “discipline.” The abuse intensifies when workers slow down or

52 Exploitation, Control, and Accountability Inside Chinese Seafood Packaging

make mistakes. This environment erodes human dignity and functions as a system that enforces silence.

Supervisors at the site often swear at us. Even when I'm late coming back from the restroom, they yell things like 'You bitch, I'll kill you' or 'Stupid wench.' There's not a day without cursing.

[Testimony from a North Korean Worker]

I once cut the fish incorrectly, and it was classified as defective. The manager called me things like 'stupid bitch,' 'acting lazy like a sloth,' 'metal-headed wench,' 'dog bitch,' 'dog-headed moron.' Others around me quietly clicked their tongues or frowned in discomfort.

[Testimony from a North Korean Worker]

This kind of language is not incidental it is institutionalized violence embedded in the daily life of North Korean workers. It constitutes not only emotional abuse but also a form of psychological exploitation. The routine use of degrading language strips workers of their dignity and discourages even the slightest expression of distress or fatigue.

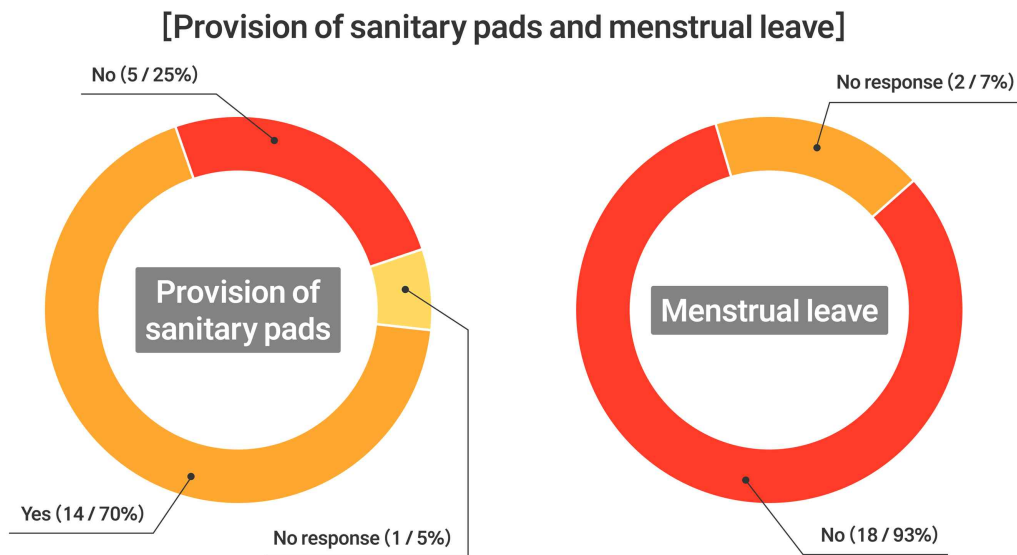
Such a coercive atmosphere, where even a brief moment of rest is discouraged despite exhaustion, aligns with international standards for forced labor. According to the International Labour Organization (ILO), working under the threat of penalties including verbal degradation without genuine consent is a core indicator of forced labor. In this case, systemic verbal abuse plays a direct role in suppressing autonomy and maintaining a climate of fear.

② **Menstruation Is No Excuse You Must Endure It**

North Korean women are required to work at full intensity even during their menstrual periods. Pain from menstrual cramps or general physical discomfort is not considered a valid reason for rest. The workplace lacks even the most basic understanding or accommodation of women's bodies.

They give us some [pads], but if we ask for more, they say we lack frugality and tell us to use them sparingly. So I don't feel comfortable using them. [Testimony from a North Korean Worker]

We're given too few sanitary pads, so we have to buy them ourselves. [Testimony from a North Korean Worker]



Although some sanitary pads are supplied, the quantity is not enough. Even when additional supplies are requested, workers are scolded and told to ration. Because wages are so low, women are forced to buy sanitary pads out of pocket, or cut back on their usage altogether to save money.

They give us money to buy pads during our periods, but to save money I just use cloth instead.

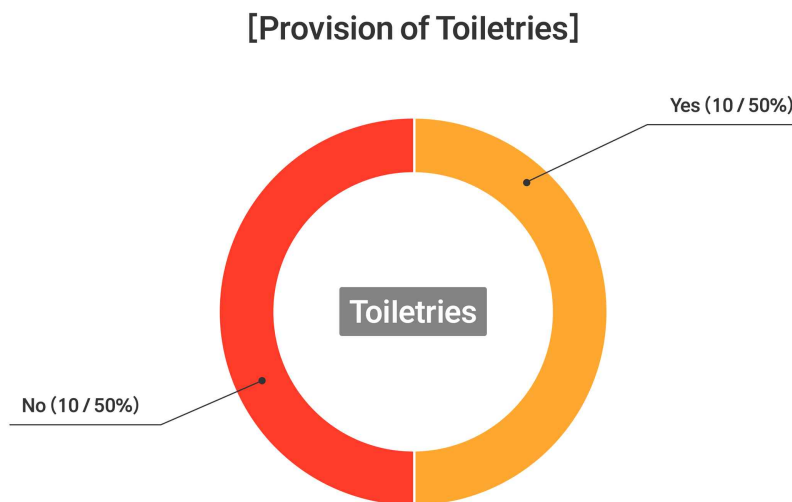
[Testimony from a North Korean Worker]

We have to take care of it ourselves. Taking time off because of a period is unheard of. I use what I brought with me. I wash and reuse it. Back home, I used disposable ones, but here I have to buy them myself, so I just asked a friend for a few and use those.

[Testimony from a North Korean Worker]

This situation goes far beyond mere discomfort. It shows how women's basic rights to health and dignity are being completely ignored. The fact that they cannot rest during menstruation, and must purchase their own sanitary products out of inadequate wages, is a stark example of gender-based exploitation.

③ **Even Basic Necessities Must Be Purchased Out of Pocket**



North Korean workers are required to pay for their own daily necessities, including cosmetics, toothbrushes, and hygiene products. These items are not supplied by the factories. The problem is that their wages are extremely low, as most of their earnings are deducted under the pretext of fulfilling the state's "foreign currency quotas." The amount they receive is often insufficient to cover even basic living expenses.

I had to buy cosmetics and toiletries myself. There was usually enough food, but sometimes it became insufficient due to disciplinary punishment. (...) While others in the eating group waited until the rice was done and ate slowly, I just ate quickly and returned to work.
[Testimony from a North Korean Worker]

While the state collects workers' wages in the name of foreign currency tasks, it fails to provide even the minimum necessities for daily life. As a result, workers receive virtually no real income, yet are still forced to cover their own basic living expenses. This is not merely a burden it is a form of systematic exploitation that denies even the right to a dignified life.

There was no case of anyone outright refusing a manager's order, but one worker was once excluded from lunch, nighttime snacks, weekend fruit, and the monthly supply of basic necessities.

[Testimony from a North Korean Worker]

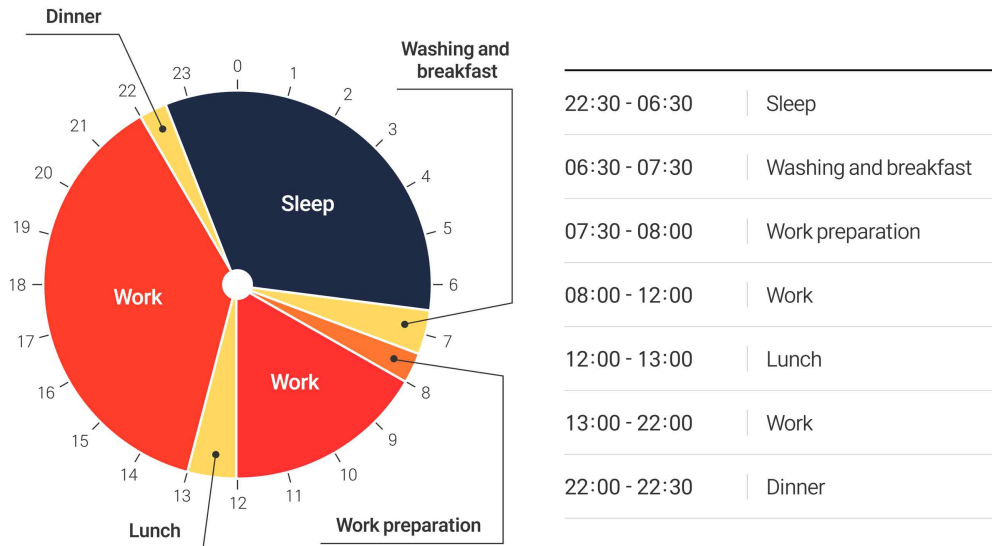
Basic necessities are not treated as fundamental rights, but rather as tools of control and punishment. Whether or not they are provided is entirely at the discretion of the manager, and workers who disobey orders may find their meals or essential items restricted. This illustrates a structure of exploitation in which even the conditions for survival are weaponized to enforce obedience.

④ We Are Not Allowed to Rest and Are Treated Unequally Compared to Chinese Workers

North Korean workers labor under entirely different conditions than their Chinese counterparts, despite working in the same facilities. They work longer hours, receive lower wages, and are subject to significantly stricter surveillance.

We sort and package dried fish into labeled plastic bags by category. Usually, we work 12 to 14 hours a day. We wake up at 6:30 a.m., wash up and eat breakfast by 7:30, organize work by 7:50, and prepare for the day's work by 8. Then we work from 8 a.m. to 12 p.m., take a lunch break until 1 p.m., work again until 10 p.m., eat dinner, and go to bed around 10:30. [Testimony from a North Korean Worker]

[A Worker's Daily Schedule]



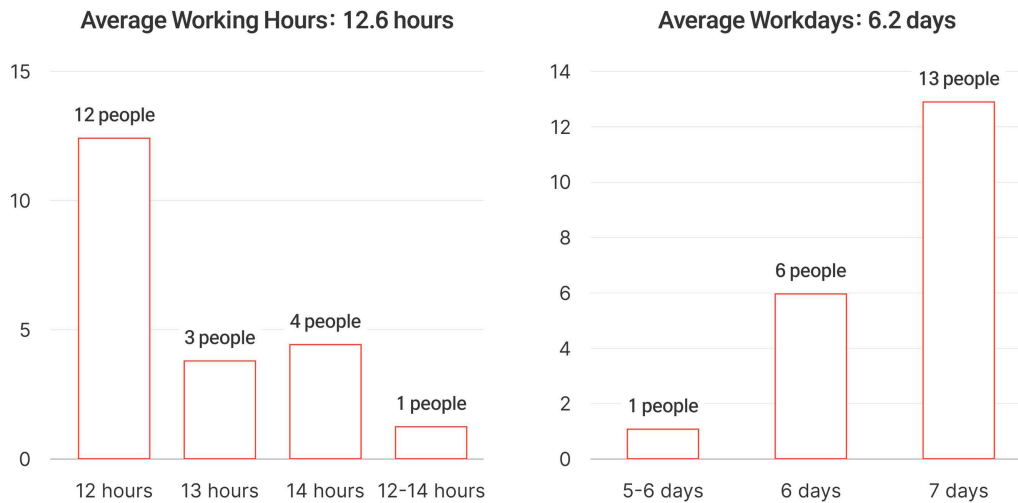
A North Korean worker's day is strictly regimented, with virtually no concept of "rest." Excluding meal times, nearly every hour from 6:30 a.m. to 10:30 p.m. is dedicated to labor. Compared to Chinese workers in the same factory, this is an excessively long workday and constitutes a clear case of discrimination and human rights abuse.

Chinese workers don't do night shifts and aren't watched over like us. We work a lot of night shifts, but we don't get much in return.
 [Testimony from a North Korean Worker]

This shows that North Korean workers are not just working harder and longer they are being systematically exploited. This isn't mere discrimination; it reflects a state-sponsored and institutionalized form of exploitation driven by an imbalance of power and human rights between nations.

Article 44 of China's Labor Law stipulates that workers must receive additional compensation for overtime. However, North Korean workers receive no extra pay for night shifts, which helps explain why Chinese workers can avoid such assignments. In effect, North Koreans are being used as cheap, expendable labor.

[Average Working Hours and Days per Week]



The graph above shows the average daily working hours and number of working days per week for North Korean workers. Most respondents reported working more than 12 hours a day and more than 6 days a week, with 13 respondents saying they worked all 7 days. On average, workers worked 12.6 hours per day and 6.2 days per week, indicating that they were subjected to long working hours nearly every day. This reflects a structure of overwork that clearly violates international labor standards.

This system cannot be blamed on the North Korean government alone. Chinese seafood factories that rely on the low wages and discriminatory treatment of North Korean workers also bear responsibility. It is, in essence, a bilateral system of exploitation, one that warrants the attention of the international community.

⑤ **If You Get Sick or Injured, You're Sent Back Home**

For North Korean workers, saying "I'm sick" is not permitted. Even when ill or injured, they are not allowed to rest. Instead of receiving medical treatment, they are more likely to be sent back home effectively expelled. Within the factory system, illness is seen as a loss of labor capacity and leads to being labeled as a problematic worker.

If someone gets sick, they're frowned upon. If they stay sick or can't work for several days, they're told to return to the homeland.

[Testimony from a North Korean Worker]

One worker said they had a perforation in their stomach, but the manager dismissed it as exaggeration and just handed out medicine without diagnosis. (Eventually) they refused proper treatment and kept taking the medication until they were sent home in 2023.

[Testimony from a North Korean Worker]

Workers must bear the cost of their own treatment, and even then, they are often forced to resume work without proper care or are pressured to return to North Korea.¹⁴⁾

In this environment, illness and injury are not treated as conditions requiring care or protection. Denied their right to proper medical treatment, workers are ultimately driven out through forced repatriation a punitive measure disguised as administrative action. This is not only a violation of labor rights, but a serious threat to the right to life itself.

(2) Manager's Perspective

An Inhumane System and Evasion of Responsibility

① Rest and working hours are arbitrarily determined by the manager.

Even managers acknowledge that North Korean workers labor under harsher conditions than their Chinese counterparts. However, they frame this disparity as a form of "reasonable adjustment," claiming that rest time can be modified depending on workload.

14) According to a Daily NK investigative report, workers testified that "even when bleeding, they had to wrap a bandage and return to work." Some said they could not leave their posts despite having deep cuts on their fingers because they were part of a "flow-based" production system. "[Trapped in the Net of Human Rights] 'Blood was dripping, but...'" North Korean Workers in China Speak Out," Daily NK, April 26, 2025. (<https://www.dailynk.com/20250426-2/>)

We apply standards at about 80% of what Chinese workers get, and break times are adjusted based on the amount of labor to be processed. [Testimony from a North Korean Manager]

This statement reveals a structural dynamic in which North Korean workers, already subjected to unequal conditions, are expected to perform more labor. The system is not about protecting workers' rights, but about exercising flexible managerial control based on productivity demands.

In particular, regarding rest time as an "adjustable item" is a key indicator of forced labor under international standards.

In practice, rest is granted or denied at the discretion of managers, with no regard for workers' physical recovery or health rights. This shows that even the minimum conditions for workers to claim their own rights are not guaranteed. Such a structure represents a core component of forced labor, where control over rest and exertion is used as a tool of domination rather than protection.

② Failure to Meet Quotas Results in Punishment

North Korean workers are required to meet their assigned production targets without exception. Managers impose additional work or even repatriation measures on workers who fail to achieve their quotas. In effect, these are forms of punishment.

If workers fall short of the target, we don't criticize them immediately, but after three times, they are unconditionally placed on the repatriation list. We assign additional tasks so they can compensate for the shortfall through extra labor. While there is no monetary penalty, we have, under higher-level instructions, adjusted rest periods on some occasions. [Testimony from a North Korean Manager]

If a worker fails to meet the production target, we issue up to two warnings and assign additional tasks. Wages are never paid absolutely zero under such circumstances. [Testimony from a North Korean Manager]

This structure enforces performance and penalizes failure. Workers operate under constant anxiety that they could be forcibly repatriated if they do not meet their quotas, which means their labor is not voluntary but coerced.

The fact that wages are withheld entirely due to insufficient output is especially problematic. Even though workers are entitled to receive their contracted wages, they are subjected to extreme penalties such as receiving “zero won” simply for falling short of a goal. This directly corresponds to the ILO criteria for forced labor.

Ultimately, this system functions as a form of self-surveillance, compelling workers to regulate themselves out of fear. It constitutes a structural mechanism of forced labor.

③ **Medical Costs Are Paid Out-of-Pocket, and Sickness Means Repatriation**

When North Korean workers are injured or fall ill on the job, they sometimes receive medical attention. However, they must cover the cost of treatment themselves. If the condition is serious, they are repatriated immediately.

When a worker in Dandong gets sick or injured, we either bring in a local doctor for a house call or send them out for treatment at an outside hospital. Treatment costs were reportedly covered by the Chinese side until 2019, but now they are paid collectively by the workers. We pre-deduct an amount from the operation budget and combine it with a pooled ‘medical insurance fee’ collected from each worker. In serious cases, we decide on repatriation and send them back to the homeland. [Testimony from a North Korean Manager]

This is less a system of care than a mechanism of exclusion. While the manager claimed that medical costs are covered through funds “pre-deducted from the operation budget,” workers testify that they, in fact, pay the full amount out-of-pocket.

In practice, there is no clarity on how the operation budget is applied to workers, what the medical fees amount to, or how such costs are calculated. The manager's explanation gives the appearance of a structured system, but workers end up hiding their illness and working through pain, only to be eventually sent home without proper treatment.

Once ill, workers are deemed "useless" and disappear from the worksite under the label of "repatriation." A system where even acknowledging one's illness becomes a liability is a clear violation of human rights and meets the criteria of forced labor.

④ Even Death Is Handled Quietly and Discreetly

When a North Korean worker dies on the job, the incident is handled quietly and without public acknowledgment. The ashes are stored at the factory, and any compensation or follow-up procedures are determined through negotiations between North Korean and Chinese managers.

The cause of death is investigated, the ashes are kept on site, and any postmortem measures such as compensation are handled through agreement between the two countries' managers.

[Testimony from a Chinese Manager]

This approach reveals how even an individual's death is subject to state control. The family is often denied the right to be informed, and there is little evidence of any condolence or mourning process. Everything is processed under the name of systematic "management," reducing a human life to a bureaucratic matter.

This reality starkly illustrates the lack of respect for the lives of these workers. Their deaths are not treated as personal tragedies but as operational incidents to be resolved quietly.

⑤ **Collective Criticism Meetings Reinforce Fear and Silence**

Inside the factory, group meetings known as chonghwa are held frequently. These gatherings are not simple meetings; they serve as platforms to point out workers' mistakes, subject them to public criticism, and sometimes inflict psychological punishment.

They hold chonghwa-type meetings to criticize workers, threaten them with repatriation, and make them work without rest.

[Testimony from a Chinese Manager]

If a worker expresses dissatisfaction or behaves in a way that draws attention during chonghwa, they are often threatened with being sent back to North Korea. Such threats are accompanied by additional work assignments and restrictions on rest time. This structure compels workers to remain silent and submissive in order to survive.

Ultimately, this goes beyond ordinary workplace discipline. It effectively recreates a "miniature North Korean society" even in overseas labor sites. Surveillance and control, punishment disguised as voluntary compliance chonghwa functions as a psychological apparatus to sustain forced labor, demonstrating how North Korea's authoritarian mechanisms are transplanted into foreign factories.

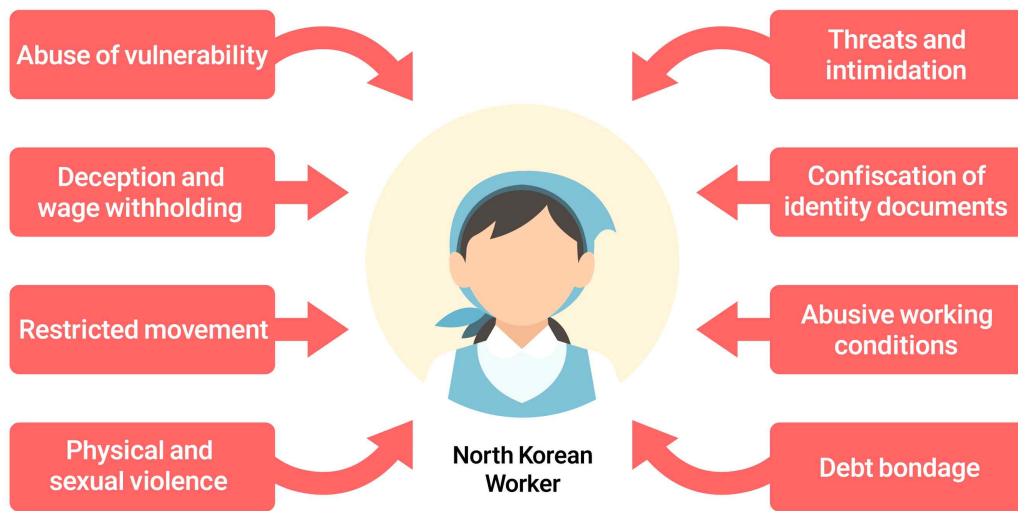
Demonstrating Forced Labor: International Standards, Legal Violations, and the Structure of Responsibility

1. Why Is This Considered Forced Labor?

The International Labour Organization (ILO) defines forced labor as “all work or service which is exacted from any person under the menace of any penalty and for which the person has not offered himself voluntarily.” Based on this definition, the ILO outlines 11 indicators of forced labor. The cases of North Korean female workers clearly correspond to many of these indicators.

[ILO Indicators of Forced Labor and Corresponding Worker Testimonies]

ILO Indicator	Worker Case
Abuse of vulnerability	Workers face delayed or reduced wages if they refuse sexual advances from supervisors.
Deception	Most of the wages are taken by the state; workers receive only 10 to 20 percent.
Restriction of movement	Two guards are stationed in the hallway and outside 24/7 to monitor and control movement.
Isolation	Those who try to escape are caught, forcibly repatriated, and may go missing.
Physical and sexual violence	Sexual jokes are normalized, and women are pressured to sleep with their supervisors.
Intimidation and threats	During 'chonghwa' meetings, workers are threatened with being sent back to North Korea.
Retention of identity documents	All ID cards that could verify workers' nationality are confiscated.
Withholding of wages	Workers are not paid if they fail to meet production targets.
Debt bondage	Workers pay bribes to supervisors or officials before being dispatched abroad.
Abusive working and living conditions	Sick workers are still forced to work and may face forced repatriation if they collapse.
Excessive overtime	Workers labor over 12 hours per day, more than six days a week.



These examples demonstrate that North Korean workers are not merely working under poor conditions they are subject to systematic control and exploitation by both the state and on-site managers. Crucially, their situation meets the ILO's core indicators of forced labor.

The ILO emphasizes that forced labor is not simply about being "made to work," but about labor that lacks voluntariness under threat of penalty or punishment. North Korean workers have no freedom to refuse or stop working. On the contrary, those deemed "unproductive" face forced repatriation, wage deductions, verbal abuse, and other penalties. They cannot survive without working, and even when they do, they are not adequately compensated.

Furthermore, the broader system including bribery before dispatch, confiscation of passports, surveillance, isolation, sexual coercion, lack of medical care, and discriminatory access to food reflects a labor environment marked by vulnerability and fear. It is in this context that work is coerced, rather than chosen.

2. What Has Been Violated?

The Daily NK AND Center obtained employment contracts used for North Korean workers at seafood processing factories in China. These contracts state, “In accordance with the Labor Law of the People’s Republic of China, Party A and Party B shall enter into this contract through equal negotiation and on a voluntary basis, and shall abide by the terms mutually agreed upon.” The contracts also include provisions on duration, job duties, labor protection, and working conditions.

However, the actual operation at these sites starkly contradicts the language of the contracts. The gap between what is written and what is practiced reveals not merely a breach of domestic law, but a clear case of structural forced labor that also violates international labor standards, including the core conventions of the International Labour Organization (ILO). The following violations point to a pattern of compounded breaches of both Chinese labor law and global labor norms.

(1) Violation of Chinese Labor Law

① Breach of the Principle of Direct Wage Payment

The labor contract explicitly states that “the wages for North Korean workers will be paid in a lump sum to the North Korean team leader.” This directly violates a fundamental principle of Chinese labor law, which holds that workers must receive their wages personally and be free to dispose of them as they see fit.

Legal Provision	Text of the Article
Article 50 of the Chinese Labor Law	Wages shall be paid to the workers themselves on a monthly basis in the form of currency in circulation, and wage payment shall not be delayed without justification.

Nevertheless, North Korean workers have never received their wages directly. Instead, the full amount is managed through the bank account of a third party, namely, the North Korean team leader. Workers only receive small portions of their wages from the team leader in the form of cash or goods, labeled as “living expenses.” This indirect payment structure deprives workers of economic autonomy and presents clear potential for wage exploitation and control.

This is not merely a matter of administrative convenience. It constitutes a structural violation that undermines the labor law system designed to ensure wage protection. By institutionalizing intermediary exploitation, this arrangement strips workers of their right to receive wages directly. The denial of that right amounts to a serious human rights violation, as it infringes upon the worker’s right to livelihood and private property, placing those rights under the control of the state and its appointed managers.

② Violation of the Obligation to Specify Working Conditions

The labor contracts signed with North Korean workers contain only vague and general statements such as “complying with Chinese working hours.” However, critical working conditions, including actual working hours, holidays, rest periods, social insurance coverage, and the method of wage calculation, are not specifically stated. This directly contravenes Article 17 of the Chinese Labor Contract Law, which mandates the inclusion of specific items in the contract.

Legal Provision	Text of the Article
Article 17 of the Chinese Labor Contract Law	A labor contract shall clearly state the worker’s job duties, work location, working hours, rest and leave, labor protection, wages, social insurance, contract term, and other terms and conditions. The rights and obligations of both parties shall be explicitly defined.

Nevertheless, most of these items are omitted or replaced with abstract phrases in the contracts signed by North Korean workers. As a result, the contract fails

to function as a legally binding document of rights and obligations. In the event of a dispute, workers face significant structural disadvantages in proving their claims or seeking remedies.

This type of formalistic contract undermines structural protections for workers' rights. When critical elements such as working hours, rest, or wages are not specified, it becomes difficult to raise legal claims in cases of violations. Likewise, labor inspection authorities are limited in their ability to determine breaches or issue corrective orders when legally required contract terms are missing. Moreover, contracts that fail to meet legal requirements may be deemed invalid, allowing employers to evade responsibility. This is not a minor administrative flaw but rather a systemic deprivation of rights that undermines the explicit protective standards set by Chinese labor law.

③ Contracts Signed Without Voluntary Consent

The labor contracts state that they were "concluded through voluntary agreement." However, the actual process by which these contracts are signed excludes any true element of voluntariness. Before being dispatched to China, North Korean workers are subjected to political loyalty screenings, financial burdens, and in some cases, sexual coercion.

Contracts signed under these conditions are not the result of free will but of coercion. Once deployed, workers have their passports confiscated. All communication and movement such as phone calls, internet access, and going outside are strictly restricted. This effectively strips them of the right to terminate the contract and makes it impossible to withdraw consent or leave the job.

Legal Provision	Text of the Article
Article 32(2) of the Chinese Labor Law	If an employer compels a worker to conclude or fulfill a labor contract by means of violence, threats, or unlawful restriction of personal freedom, the worker has the right to terminate the contract at any time.

In the case of North Korean workers, any attempt to terminate the contract or flee may result in serious retaliation after repatriation, including political punishment and collective punishment of family members. Thus, while the law provides the right to terminate, in practice this right is rendered meaningless. These contracts were never entered into by free choice, nor can they be freely exited. The claim of "voluntary agreement" is purely superficial. In essence, these are not truly voluntary contracts but coercive agreements disguised in formal paperwork.

④ A Monitoring System That Fails to Function

Articles 85 and onward of the Chinese Labor Law stipulate that government agencies such as the Ministry of Human Resources and Social Security are responsible for investigating employers' violations, issuing corrective orders, and imposing penalties. This reflects the principle that the state must actively intervene to protect workers' basic rights. However, in the case of North Korean workers, labor contracts are often informal or only nominally executed, and their nationality or identity is frequently not properly registered in the factory's administrative system.

As a result, regulatory authorities struggle to recognize these "informalized" workers as subjects of labor protection. Factory management often deliberately conceals or distorts information about North Korean workers, making investigation and enforcement virtually impossible. Moreover, due to group accommodations, passport confiscation, and complete isolation from external contact, there are no viable channels for workers to file complaints or report abuse. In practice, workers are unable to raise issues themselves.

Ultimately, while the monitoring system may formally exist, it is functionally ineffective. This is not merely a matter of administrative deficiency but the outcome of structural silence and irresponsibility, shaped by government neglect, employer concealment, and systematic intervention by North Korean authorities. Although the law exists, those whom the law is meant to protect are not even acknowledged as legal subjects within the system.

(2) Violation of International Law

Although North Korea is not a member of the International Labour Organization (ILO), and therefore not formally bound by its conventions on forced labor, China is a full member of the ILO and has ratified Convention No. 29 concerning the Abolition of Forced Labour. As such, all forms of forced labor occurring within Chinese territory fall under China's obligations under international law. This responsibility extends not only to Chinese nationals but equally to all foreign workers residing and working within China.

Given the documented evidence and testimony confirming that North Korean workers are being systematically mobilized for long-term and repetitive forced labor in Chinese seafood processing factories, the Chinese government cannot dismiss this situation as merely a "diplomatic issue" or deflect responsibility onto the North Korean side. This is not simply a matter of bilateral agreements or cooperation; it falls squarely within China's legal and moral obligation to uphold universal human rights standards under the international conventions it has voluntarily ratified.

As a responsible actor in the international community, China has a duty to prevent human rights abuses within its territory and to investigate and remedy violations when they occur. These obligations are not optional; they are binding legal commitments under international treaties. Inaction or silence in the face of such abuses may constitute a breach of China's treaty obligations.

The following section will examine in detail how the forced labor of North Korean workers constitutes a clear violation of international law, with reference to China's commitments under key ILO conventions and United Nations human rights treaties.

① Violation of ILO Convention No. 29 on the Prohibition of Forced Labour

China has ratified ILO Convention No. 29 concerning Forced or Compulsory Labour and is therefore legally obligated to monitor and remedy all forms of involuntary labor within its territory.

The convention defines forced labor as “all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.” This definition goes beyond physical restraint to include restrictions on freedom of movement, the right to terminate a contract, and the ability to refuse work all of which serve as key indicators of forced labor.

The reality faced by North Korean workers in Chinese seafood processing plants corresponds directly to this definition. Even before deployment, they are subjected to political vetting and forced to pay bribes. Upon arrival, their passports are confiscated, and all external communication is cut off. Voluntary termination of employment or refusal to work is not an option; workers who fail to meet expectations or attempt to resist face threats of forced repatriation, wage reductions, verbal abuse, and even physical violence. These conditions constitute a form of coercion in which labor cannot be freely withdrawn meeting the ILO’s own criteria for forced labor, even in the absence of physical imprisonment.

This is not simply a matter of poor working conditions. What makes this situation a clear case of forced labor is the structural inability of workers to cease working or protest rights violations on their own initiative. In other words, the phrase “mutual agreement” in the employment contract cannot obscure the fact that this constitutes a serious violation of an international convention. It is not merely a domestic legal issue but a human rights concern that requires scrutiny and response from the international community at large.

② Violation of ILO Convention No. 95 on the Protection of Wages

Although China has not ratified ILO Convention No. 95 concerning the Protection of Wages, as a member of the International Labour Organization (ILO), it is nonetheless obligated to respect and uphold the core principles enshrined in the convention namely, the direct payment of wages to workers and the prevention of exploitation.

Article 5 of Convention No. 95 explicitly states that wages must be paid directly to the worker and that indirect payment through third parties is generally prohibited. The case of North Korean workers represents a clear violation of this principle. Wages are not paid to the workers themselves but are instead transferred in full to North Korean team leaders. In reality, workers receive only about 10 percent of their earnings, typically as small amounts of cash or goods for subsistence. The remainder is appropriated by the North Korean state under the guise of fulfilling a “foreign currency quota.” In many cases, the payroll records serve merely as a deceptive formality.

This system constitutes a complete denial of workers’ economic autonomy and amounts to a direct infringement on their right to a livelihood. More critically, this is not an administrative anomaly or isolated incident it is a systematized and institutionalized form of exploitation. Workers have no ability to claim fair compensation for their labor, nor are they allowed to use their wages freely for saving, remittance, or consumption.

Such structural denial of wage rights also intersects with the core criteria of “lack of voluntariness and presence of exploitation” defined under ILO Convention No. 29 on Forced Labour. Even if China is not a party to Convention No. 95, it cannot acquiesce to or ignore the existence of an institutionalized wage exploitation system within its jurisdiction. As a ratifying party to Convention No. 29, China bears an international legal responsibility to recognize wage control and third-party disbursement as indicators of forced labor and to take immediate supervisory and corrective action.

③ Palermo Protocol (Protocol to Prevent, Suppress and Punish Trafficking in Persons)

The Palermo Protocol officially known as the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children defines trafficking in persons as acts involving coercion, deception, or abuse of power for the purpose of exploitation. The case of North Korean workers aligns with this definition in multiple respects, including political loyalty screenings, confiscation of passports, restrictions on movement, third-party wage collection, and instances of sexual exploitation. These elements collectively indicate a state-organized system of labor deployment for the purpose of exploitation characteristics that meet the criteria for human trafficking.

First, even prior to deployment to China, workers are subjected to rigorous political loyalty assessments, are forced to provide bribes to high-ranking officials, and often endure humiliating interview processes involving sexual coercion. These preconditions strip the worker of any genuine freedom to consent or refuse the contract.

Second, upon arrival, labor conditions are unilaterally altered without prior disclosure. Any attempt to escape is met with constant threats of collective punishment for family members remaining in North Korea, amounting to persistent psychological coercion.

Once in China, workers have their passports confiscated and are completely cut off from external contact. Factory sites are staffed with on-site "monitors" who impose full control over workers' movement and daily life. This system of control far exceeds the scope of an ordinary employment relationship, constituting a physical and psychological regime of oppression that is consistent with the organized exploitative practices defined under the Palermo Protocol.

Most notably, wages are not paid directly to the workers, but are instead funneled to North Korean supervisors. Only a minimal portion is returned to the workers as so-called "living expenses." Between 80 to 90 percent of their

earnings are surrendered to the state as part of foreign currency quotas. Reports also document forced sexual services, excessive labor hours, and medical neglect. This wage expropriation system transcends mere labor violations and constitutes an organized mechanism for the state to reclaim economic gains at the expense of human dignity thus satisfying the exploitation element of human trafficking.

Such a structure cannot be considered a legitimate overseas employment arrangement. It is a form of coerced labor deployment disguised as consent. China cannot justify inaction by attributing the situation solely to the North Korean authorities. This constitutes a clear violation of international conventions. The issue is not merely one of labor rights but of international crimes that infringe upon personal liberty and human dignity. It demands accountability from the Chinese government and a coordinated response from the international community.

④ Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)

China ratified the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) in 1980 and is thereby legally obligated to implement its provisions. Article 6 of the Convention explicitly states that “States Parties shall take all appropriate measures, including legislation, to suppress all forms of traffic in women and exploitation of prostitution of women.”

However, testimonies from North Korean female workers reveal a reality that falls far short of these obligations. According to several accounts, some female workers are subjected to sexual objectification and pressure from managers or supervisors, and those who resist often face retaliatory disadvantages at work. These women operate within a system where implicit sexual exploitation is normalized and expected. In extreme cases, they are mobilized for organized prostitution, required to serve external guests, or compelled to perform “special duties” that amount to de facto sexual labor. Refusal to comply often results in punitive measures.

Such practices are not isolated incidents of misconduct by individual supervisors. Rather, they reflect a systematic abuse of power that intertwines gender-based discrimination with structural sexual exploitation. This directly contravenes Article 6 of CEDAW and demonstrates the Chinese government's failure to enforce its treaty obligations to prevent the sexual exploitation of women.

Moreover, persistent surveillance and control within the factories, the complete absence of external reporting channels, and the lack of effective legal protection mechanisms in China render female workers essentially defenseless against such abuse. The systemic barriers to accountability mean that safeguards against sexual exploitation are functionally nonexistent.

Therefore, the sexual exploitation of North Korean female workers is not merely a labor rights issue it constitutes a serious violation of a core provision of an international human rights treaty to which China is a State Party. It must be recognized as a structural failure of the state to uphold its obligations to prevent gender-based exploitation and protect women's rights under international law.

3. Who Should Be Held Accountable?

(1) Responsibility of the North Korean Authorities

The overseas dispatch of North Korean workers is not a private economic activity. It is part of a state-led strategy to earn foreign currency. The system is planned and executed by the state, and labor is actively exported for the purpose of acquiring hard currency. Every stage of the process, including selection, training, deployment, and supervision, is controlled by core government bodies such as the Organization and Guidance Department of the Workers' Party, the Ministry of State Security, and the Ministry of Labor.

Workers are not guaranteed the freedom to enter into contracts. Any appearance of voluntary participation in the dispatch process is merely procedural. The confiscation of passports, restriction of outside contact, political

indoctrination, and constant surveillance function as tools to suppress the workers' freedom of movement and expression.

This system shows that the North Korean authorities treat overseas workers not as autonomous labor subjects but as instruments for acquiring foreign currency. Wages are not received by the workers themselves but by the state, which collects the majority of their earnings under the pretext of fulfilling national tasks. At the same time, the authorities take no responsibility for the welfare, safety, or rights of the workers. North Korea is the direct perpetrator of this exploitation. These practices constitute structural abuse that violates international labor standards and fundamental human rights principles.

(2) Responsibility of Chinese Companies

Most companies employing North Korean workers in China prepare labor contracts in form only, typically including a clause stating that they will comply with Chinese labor laws. However, in practice, these companies delegate all personnel and labor management to North Korean team leaders. They avoid direct involvement in wage payment, working hours, and welfare conditions. This arrangement effectively neglects the employer's core responsibilities, which include managing the working environment and protecting human rights.

Moreover, despite being aware of these structural problems, the Chinese government does not conduct meaningful oversight or impose sanctions, citing diplomatic sensitivities or economic interests. As a result, the forced labor of North Korean workers remains unaddressed within a system that combines corporate irresponsibility and state inaction. This situation constitutes a serious violation of both the corporate duty of human rights due diligence and the state duty to protect, as emphasized in international human rights law.

(3) Responsibility of the Chinese Government

China's Labor Law and Labor Contract Law explicitly state that the government has the authority to investigate employer violations and issue corrective orders or impose penalties. This reflects the fundamental principle that the state bears ultimate responsibility for protecting workers' rights.

However, the employment of North Korean workers often falls outside the scope of standard oversight procedures due to the informal nature of their contracts and the invocation of diplomatic exceptions. As a result, labor supervisory authorities have neglected this regulatory blind spot, effectively failing to fulfill their legally mandated oversight responsibilities.

If the Chinese government continues to avoid active intervention despite being aware of the labor conditions and human rights abuses faced by North Korean workers, citing diplomatic concerns, such inaction may be construed as tacit approval or even complicity. As a state party to the International Labour Organization's Forced Labour Convention (No. 29), China is obligated to prevent, monitor, and sanction instances of forced labor within its jurisdiction. Regardless of diplomatic context, the Chinese government must not disregard international norms aimed at ensuring universal human rights. The current structural lack of supervision not only undermines domestic legal commitments but also invites international criticism.

(4) Shared Responsibility of the International Community

The international community has long been aware of the systemic human rights violations associated with North Korea's overseas labor program. Nevertheless, this issue continues to fall within blind spots in the monitoring of global supply chains. United Nations Security Council Resolution 2397 explicitly prohibits the dispatch of North Korean overseas workers. In practice, however, North Korean labor remains embedded in the international market through indirect employment via third countries, concealment of country of origin, and

mislabeled of raw materials used in final products. This constitutes a structural weakness that undermines the effectiveness of the international sanctions regime.

Therefore, beyond the mere establishment of norms, it is essential to ensure actual enforcement. This requires coordinated action among states, enhanced supply chain due diligence by private companies, and institutional measures such as international sanctions and public disclosure of violations.

In particular, governments of importing countries and multinational corporations bear responsibility for ensuring transparency in product sourcing and complying with human rights due diligence reporting obligations. The international community must move beyond passive recognition of the issue and work collectively to establish an effective enforcement system that guarantees both compliance with sanctions and the protection of human rights.

(5) Responsibility of Seafood Importing Companies Involved in Forced Labor

Despite the fact that seafood products processed with North Korean labor in China are being exported to third countries such as the United States and South Korea, many importing companies have failed to implement meaningful due diligence across their supply chains. Instead, they rely on superficial social audits to evade accountability. The structure in which products involving forced labor by North Korean nationals reach final markets via third countries functions as a key conduit for concealing the origin of both materials and labor, thereby undermining the effectiveness of international norms.

According to a 2023 investigation by the Outlaw Ocean Project, North Korean workers were subjected to long hours of forced labor in seafood processing factories in Dandong and Dalian, China, and products from these facilities were confirmed to have been sold through major U.S. retail networks.

United Nations Security Council Resolution 2371 (2017) explicitly bans the export

of North Korean seafood and includes the provision of overseas labor by North Korean nationals as a target of international sanctions. The resolution requires all UN member states to prohibit both the employment of North Korean nationals and the import of goods containing their labor. Accordingly, companies that import and distribute such products cannot claim exemption from responsibility under international sanctions regimes.

Importing companies must not rely solely on contract-based “nationality verification” or voluntary declarations from suppliers. Instead, they must conduct thorough due diligence on actual working conditions and production sites and establish corporate-level mechanisms for the prevention and remediation of related human rights abuses. This is not only an obligation under the UN Guiding Principles on Business and Human Rights but also a minimum standard for responsible conduct in global supply chains.

(6) Responsibility of Consumers

Seafood products processed through the forced labor of North Korean workers are entering the market under the simple label of “Made in China” and are being distributed through a wide array of channels, including major supermarkets, traditional markets, restaurants, and online platforms. In this process, consumers often remain unaware of the exploitative conditions behind these products and make purchasing decisions without informed consent, thereby unintentionally supporting and perpetuating a system of structural exploitation.

Products based on forced labor are not solely an issue of their place of origin; they are directly tied to consumer choices. The international supply chain links human rights realities at the production site to consumption behavior in the market. As such, consumers are not merely “buyers,” but rather active participants in a broader system that can either reinforce or resist exploitation.

Consumers, therefore, have a right to know how the products they use are made and, based on that information, bear a degree of ethical responsibility for

their choices. This responsibility goes beyond individual moral judgment and should be understood as a legitimate obligation under international human rights standards. To that end, institutional measures must be implemented, including enhanced access to product information, greater transparency in supply chain histories, and mandatory warning labels for goods linked to forced labor.

IV What Must Be Done

The issue of forced labor involving North Korean workers is not merely a matter of human rights violations, but a structural problem that constitutes a breach of international law and the United Nations Security Council (UNSC) sanctions regime against North Korea. In response, the international community and national governments must take the following actions:

1. Action by the International Community

(1) Strengthening the Effectiveness of Sanctions on North Korea

UN Security Council Resolution 2371 explicitly prohibits both the export of seafood products and the overseas deployment of North Korean labor. Accordingly, the production, processing, distribution, and import of seafood involving North Korean labor constitutes a violation of international sanctions. Concrete investigations and enforcement measures must be taken against the companies, brokers, and distribution networks involved.

To reinforce the responsibility of implementation, governments must establish verification systems at each stage of customs clearance, certification, and import reporting. In addition, institutional mechanisms must be introduced to impose civil and criminal liability for repeated violations.

(2) Institutionalizing Supply Chain Transparency

The complexity of global supply chains and the use of disguised trading practices serve to systematically conceal products linked to human rights violations. To address this, national governments must legislate mandatory human rights due diligence across the entire supply chain and explicitly stipulate administrative penalties and civil liability for non-compliance.

In particular, governments should establish targeted monitoring systems for practices such as origin masking, contract manufacturing, and third-country routing. An infrastructure for oversight is needed one that institutionalizes information-sharing among governments, civil society, and corporations.

In 2023, the Congressional-Executive Commission on China (CECC), a U.S. congressional body, proposed import bans on seafood products linked to forced labor.¹⁵⁾ In particular, concerns were raised about Chinese seafood processed with North Korean labor being distributed in public sectors such as U.S. military bases and school lunch programs. This underscores the urgent need to strengthen human rights due diligence in government procurement processes. It is time to initiate institutional reforms to ensure both the credibility of global supply chains and the fulfillment of human rights obligations.

(3) Strengthening Diplomatic Engagement with the Chinese Government

The continued forced labor of North Korean workers in Chinese seafood processing factories persists under the de facto acquiescence or structural complicity of Chinese authorities. The international community must reframe this issue not as a matter of bilateral relations, but as a violation of international norms. It should be formally raised through multilateral bodies such as the International Labour Organization (ILO) and the United Nations Human Rights Council. Furthermore, major trading partners should leverage diplomatic channels to press the Chinese government to fulfill its oversight responsibilities, and apply effective pressure such as trade restrictions or linkage to international evaluations based on China's level of compliance.

15) The Chair and Co-Chair of the Congressional-Executive Commission on China (CECC) sent a letter to U.S. Secretary of State Antony Blinken and Secretary of Homeland Security Alejandro Mayorkas, urging them to take swift and decisive action regarding the issue of forced labor in China's seafood industry and the possibility that American consumers may be indirectly supporting North Korea's nuclear threat. "Chairs Say Illegal PRC Seafood Imports Must Be Stopped," CECC. (Accessed July 15, 2025. <https://www.cecc.gov/media-center/press-releases/chairs-say-illegal-prc-seafood-imports-must-be-stopped-0>)

2. Strengthening Corporate Responsibility

Seafood products processed with North Korean labor are distributed within the global supply chain under the label of “Made in China,” resulting in a structural problem where companies become complicit in human rights violations without direct awareness. Corporations cannot claim to be exempt from such exploitative systems and must fulfill the following ethical and legal responsibilities:

(1) Conduct Comprehensive Supply Chain Audits

Companies must go beyond verifying only their direct suppliers and carry out in-depth due diligence across the entire supply chain, including raw material sourcing, subcontracted processing, and lower-tier suppliers. Particular attention must be given to critical indicators of forced labor, such as workforce composition, working conditions, identity verification, and wage structures. These audits must be regular, meaningful, and include external verification, with the results publicly disclosed.

(2) Implement Accountable Measures Upon Violation

If forced labor is found within the supply chain, the company must immediately suspend transactions with the implicated entity, initiate compensation procedures for affected workers, and revise internal regulations to prevent recurrence. This is not merely a matter of moral responsibility it constitutes a post-violation remedy obligation under international human rights norms. In addition, companies should formulate action plans in consultation with external stakeholders and regularly report on implementation progress.

(3) Ensure Full Compliance with Sanctions and International Law

UN Security Council Resolution 2371 explicitly prohibits the export of North Korean seafood and the provision of labor by North Korean nationals. It also bans the import of goods produced with such labor. Companies must fully understand the scope of this resolution and proactively implement supply chain

risk assessments and internal compliance systems. Establishing a robust compliance framework including verification of origin at the distribution and logistics stages and sharing information with customs authorities is essential.

3. The Role of Civil Society and the Need for Solidarity

The issue of forced labor among North Korean overseas workers cannot be resolved solely through intergovernmental agreements or corporate compliance with norms. This is a matter rooted in the universality of human rights, requiring active engagement and solidarity from civil society. Civil society must function not merely as an external monitor but as an agent of substantive change.

(1) Expanding Access to Information and Education

Public awareness of forced labor remains insufficient, and the asymmetry of information limits responsible action by consumers and citizens. Investigative journalism and current affairs programs should shed light on specific cases, while educational institutions must integrate the issue of forced labor into human rights and labor-related curricula. Civil society organizations should provide open-access archives, public campaigns, and digital content to make the reality of structural exploitation more accessible to the general public. Information generates awareness, and awareness is the foundation for action.

(2) Promoting Ethical Consumption Movements

Ethical consumption is one of the most effective and accessible ways to counter systemic forced labor. Civil society should go beyond individual “conscious consumer” campaigns and scale up into broader social movements that pressure governments and corporations to improve supply chain transparency. Tools such as boycott campaigns, consumer watchdog platforms, and ESG (Environmental, Social, and Governance) disclosure requests should be actively employed to incentivize corporate reform and link negligence to market consequences.

Consumer choices can be the most realistic form of pressure to reshape supply chain structures.

(3) Victim-Centered Solidarity and Protection

Civil society must serve as a “bridge” connecting the lives of forced labor victims, such as North Korean workers, to the outside world. Documenting and preserving testimonies not only historicizes their experiences but also establishes a moral and factual basis for institutional reform. Practical protection such as medical, legal, and psychological support for returnees or escapees must also be provided, ideally through sustained collaboration between international NGOs and domestic human rights organizations. A victim-centered approach is a core principle of human rights advocacy and the starting point for dismantling systems of forced labor



Future Tasks: Uprooting Forced Labor at Its Source

1. Key Summary

The reality faced by North Korean workers in Chinese seafood processing factories meets the International Labour Organization (ILO)'s definition of forced labor. On paper, these individuals may appear to have "freely consented" to work, but in practice, they are selected under coercion even before departure, have their passports confiscated, face restrictions on movement, suffer wage exploitation, and endure constant surveillance and threats of punishment. This is not merely a matter of poor working conditions it is a system from which workers cannot voluntarily enter or exit. This is what constitutes structural forced labor, and it represents a serious human rights violation that demands a coordinated international response.

2. Documentation as Evidence: The Need for a Monitoring System to Track Change

(1) A Human Rights Perspective on Supply Chains Is Essential

The issue of North Korean overseas labor is not confined to domestic human rights violations within North Korea. These workers are embedded as subcontracted labor in Chinese seafood factories, and the final products labeled as "Made in China" are exported globally. In other words, this is a case of human rights abuse that is structurally integrated into global supply chains. Future approaches must frame this issue through the lens of "forced labor within supply chains." It is crucial to track how exploitation is embedded in products and to institutionalize international mechanisms for regulation, oversight, and due diligence.

(2) Signs of Change Must Be Tracked Over Time

The issue of forced labor among North Korean workers must not end with the publication of a report or a one-time investigation. A long-term monitoring effort is required to assess whether international bodies, corporations, consumers, and civil society are effecting real change. For instance, clear indicators should be developed to measure progress in areas such as UN sanctions enforcement, corporate implementation of supply chain due diligence, and expansion of ethical consumer practices. Regular documentation and analysis of these indicators are necessary. Systematic verification is needed through repeated field monitoring, the collection of victim testimonies, and the development of comprehensive databases to determine whether exploitative structures persist. Such a monitoring framework will provide essential justification for future interventions, sanctions, and protection measures by the international community.

With deep respect, we thank the North Korean workers who spoke the truth despite great danger.

May this report be a first step toward justice.



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