

December 10, 2009

Marcia Eugenio
Director
U.S. Department of Labor
Office of Child Labor, Forced Labor and Human Trafficking (OCFT)
Bureau of International Labor Affairs
200 Constitution Avenue, NW., Room S-5317
Washington, DC 20210

RE: Docket No. DOL-2009-0002

Dear Director Eugenio,

This letter responds to the September 11, 2009 *Notice of Initial Determination Updating the List of Products Requiring Federal Contractor Certification as to Forced/Indentured Child Labor Pursuant to Executive Order 13126*. These comments are specifically related to the inclusion of shrimp from Thailand in this initial determination. We have no reason to believe that Thailand is using forced or indentured child labor in the growing or processing of shrimp and strongly urge you to remove Thai shrimp from this list.

Eastern Fish Co. is a global seafood company based in Teaneck, New Jersey. Eastern Fish began in 1974, primarily as a fish and crab trading company sourcing products from Alaska and Canada. By 1982 we re-directed our focus to the burgeoning farm-raised shrimp industry and began supplying fresh, consistent, premium quality shrimp. Today we are one of the world's largest importers and marketers of shrimp.

We guard our reputation for integrity and trust as determinedly as we guard the quality of the shrimp, scallops, crab and lobster we deliver to our customers. Eastern Fish sources, imports and provides more than 60-million pounds of shrimp per year from 15 different countries. And with every delivery we have one goal - earning our customers trust every single day.

We were very disturbed to see that shrimp from Thailand was listed in the Department of Labor initial determination of products where there was a reason to believe forced or indentured child labor was used. We have been importing shrimp from Thailand since 1992 and currently import more than 20 million pounds of shrimp from Thailand each year. We regularly inspect our suppliers in Thailand and have seen no evidence of forced or indentured child labor in any of our Thailand shrimp growers and processors. In addition, labor laws in Thailand and their enforcement continue to be strengthened and we aggressively support these efforts.



Headquarters:

Glenpointe Centre East
300 Frank W. Burr Blvd.
Teaneck, NJ 07666
1-800-526-9066
201-801-0800
Fax: 201-801-0802

Northwestern Sales Office:

P.O. Box 1759
Kingston, WA 98346
1-888-297-7055
360-297-5551
Fax: 360-297-5522

Western Sales Office:

2390 East Orangewood Ave.
Suite 120
Anaheim, CA 92806
1-800-824-1675
714-940-4800
Fax: 714-940-4809

Southeastern Sales Office:

210 N. University Drive
Suite 303
Coral Springs, FL 33071
1-800-232-1332
954-340-1560
Fax: 954-340-3641

Northeastern Sales Office:

85 Eastern Avenue
Gloucester, MA 01930
1-886-206-3474
978-282-1704
Fax: 978-282-1948

Central & South American Service Office:

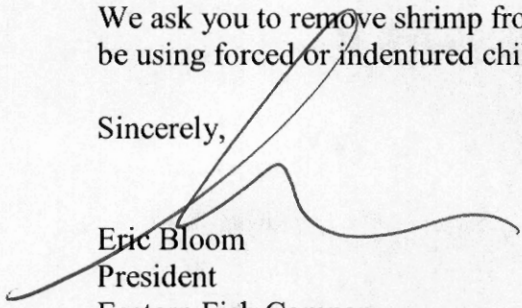
C.C. Urdesa
V.E. Estrada # 400 y las lomas
Bloque C-1, Oficina # - 3
Guayaquil, Ecuador
Tel: 011-593-4-288-0966
Fax: 011-593-4-288-1459

As an industry leader in shrimp imports and processing, we are very concerned about the impact that listing Thai shrimp on this list may have. Our clients come to Eastern Fish in order to get the highest quality shrimp from reputable sources around the globe. Listing shrimp from Thailand on this list threatens to tarnish the reputation of our products which are served on dinner tables and at restaurants across the United States on a daily basis. According to a 2006 report of the United Nation's International Labor Organization, child labor is less than a one percent problem in Thailand.¹ While any case of a child forced into labor is tragic beyond words, listing ALL Thai shrimp as a product suspected of forced or indentured child labor condemns the whole industry. Painting the entire industry in such a broad stroke is like doctor using a machete instead of a scalpel to perform a surgical procedure. If you have concerns about any particular company in Thailand please let us know and we can help address that problem with any seafood processor in Thailand based on our global position in the shrimp marketplace.

Eastern Fish is today one of the largest importers and marketers of shrimp. We would not import and market shrimp from Thailand if we had any reason to believe that there was an issue of forced or indentured child labor. Thailand is an important trading partner for Eastern Fish and a strong friend of the United States and it would be unfortunate if inclusion of shrimp from Thailand would diminish that relationship.

We ask you to remove shrimp from Thailand from your list of countries determined to be using forced or indentured child labor.

Sincerely,



Eric Bloom
President
Eastern Fish Company