HRIA Scan

Country and commodity
human rights assessment



Assess human rights risk by country and commodity

Your audit programme covers the sites you buy from. HRIA Scan is a digital, data-led assessment of the commodity behind them, down to the farms, processors and labour arrangements.

A human rights impact assessment (HRIA) identifies the actual and potential harm to people linked to a company's operations and supply chain. It assesses how severe that harm is and what the company should do about it. HRIA Scan is the desk-based first tier of an HRIA, built on EiQ's data and technology and checked by human rights practitioners.

It covers the whole value chain for one commodity from one country, including the producers you have no contract with. Each scan follows the same method and is designed to scale, with each country and commodity typically assessed within two weeks. That means you can assess many countries and commodities and compare the results.

It shows where effort should go next and how your own buying decisions affect your connection to each risk. It ends with an action plan your teams can work from, and leaves a documented record of what was assessed and why.

Where an issue can't be settled from a desk, the scan tells you which countries and commodities need interviews or fieldwork. HRIA Scan is one part of a wider set of human rights assessment services, **set out on page 11.**

EiQ by LRQA

Due diligence no longer starts with your supplier list

An audit tells you what conditions were like at one site on one day. Due diligence law asks a different question.

It asks which human rights risks are most severe in a commodity from a particular country, across the value chain, and what you've done about them. Take farmed shrimp, which we look at in detail on **page 6.** There, the question reaches smallholder ponds, sub-contracted peeling sheds and labour brokers several tiers below anyone you audit.

Most responsible sourcing programmes are built around site audits and supplier questionnaires. The country and commodity question often has no clear owner inside the business, and no budget line to answer it.



Previous Next

14 December 2027

The EU Forced Labour Regulation applies. It bans products made with forced labour from the EU market, whatever the size of the company placing them there.

26 July 2029

The EU Corporate Sustainability Due Diligence Directive applies to the largest companies, with a duty to identify and assess adverse impacts in their chain of activities.



What a country rating misses

A country rating describes a whole economy. It can't tell you which risks are salient inside the commodity you buy.

Kenya reads 3.95 on EiQ's risk scale, which is high risk. Narrow that to Kenyan tea and the score falls to 2.28, which is extreme, with the social component at 1.52. On this scale, a lower number means higher risk.

Country level

3.95

Kenya

HIGH RISK

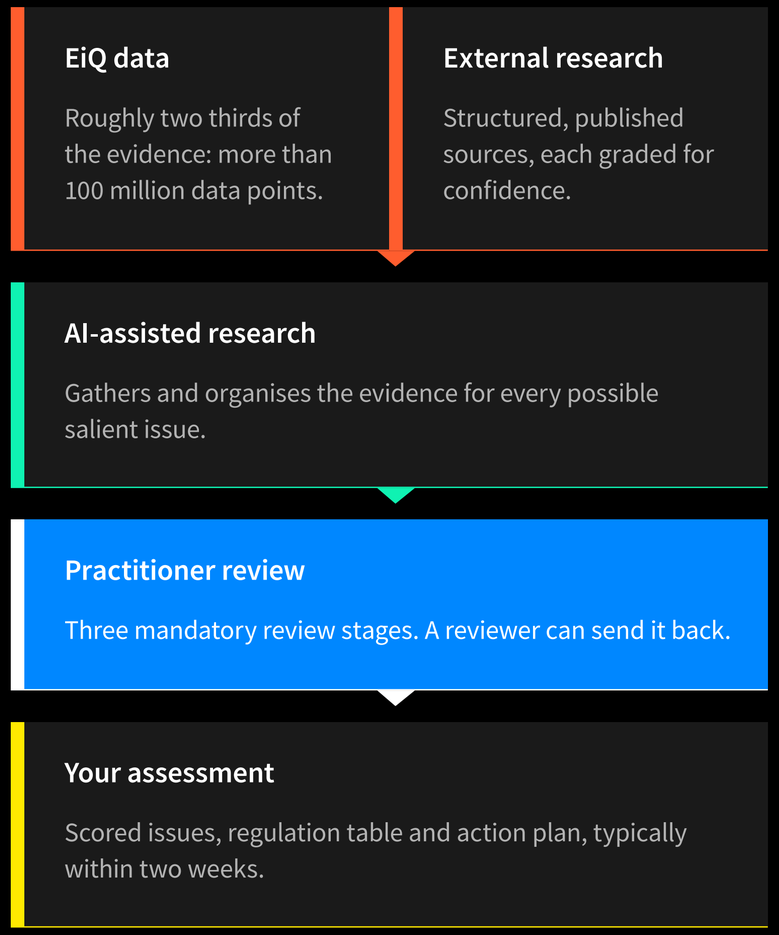
Commodity level

2.28

Kenyan tea

EXTREME RISK

A lower number means higher risk.



How an assessment is built

- Roughly two thirds of the evidence comes from EiQ's own data: more than 100 million data points across more than 1 million suppliers in 195 countries. Structured external research makes up most of the rest
- AI-assisted research gathers and organises the evidence for each issue, to a documented methodology
- Every source is graded A, B or C for confidence and logged in a source register you can read
- A finding stands only with one grade A source or two independent grade B sources behind it
- Findings with a single source are labelled plausible, not established, and listed among the limitations
- The use of AI is disclosed, and practitioners check the work at three mandatory review stages. A reviewer can send an assessment back

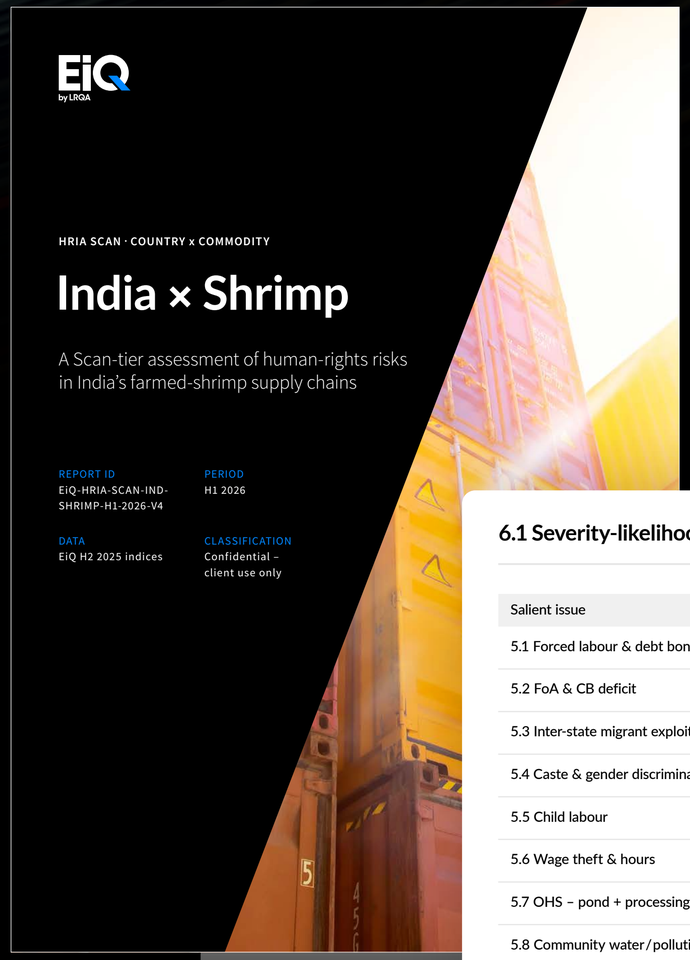
The method is grounded in the UN Guiding Principles, OECD guidance and the Danish Institute for Human Rights methodology.

Inside a scan: farmed shrimp from India

28 issues were mapped for this assessment. Nine were retained, and the report records why the other 19 were set aside, so you can follow the reasoning behind the conclusions.

Each retained issue carries:

- A severity score on the UN Guiding Principles tests of scale, scope and irremediability
- A judgement on likelihood, based on evidence for this country and commodity rather than the sector
- Your connection to the harm, classified as caused, contributed to or linked
- A finding on the leverage you hold over the conduct causing the harm



Example: Specimen pages from an HRIA Scan of farmed shrimp from India.

Forced labour and debt bondage in processing and farming scored the maximum on all three severity tests.

6.1 Severity-likelihood matrix

Salient issue	Severity	Likelihood	Connection
5.1 Forced labour & debt bondage	EXTREME	CONFIRMED (ILAB SEP 24)	LINKED → CONTRIBUTE
5.2 FoA & CB deficit	EXTREME	CERTAIN (STRUCTURAL)	LINKED
5.3 Inter-state migrant exploitation	EXTREME	SYSTEMIC	LINKED → CONTRIBUTE
5.4 Caste & gender discrimination	EXTREME	NEAR CERTAIN	LINKED → CONTRIBUTE
5.5 Child labour	EXTREME	HIGH	LINKED
5.6 Wage theft & hours	HIGH	NEAR CERTAIN	LINKED → CONTRIBUTE
5.7 OHS – pond + processing	HIGH	HIGH	LINKED
5.8 Community water/pollution/AMR	HIGH	NEAR CERTAIN	LINKED
5.9 Coastal community land rights	MEDIUM	HIGH	LINKED

How you buy can change your connection to a risk

Whether you're linked to a harm or contributing to it can depend on your own buying practices. The assessment tests that, issue by issue.

In the shrimp assessment, five of the nine retained issues move from linked to contributing depending on how the buyer operates. The questions are specific:

- Do your supplier terms let labour contractors house workers in hostels the processor controls?
- Are wages paid into workers' own bank accounts, or through a contractor's account?
- Have price reductions on the commodity been passed down to contractor and worker wages?
- Is certification treated as assurance on its own, without further checks?
- Are age checks applied at sub-contractors, or only at the main processor?



When to stay and when to leave

Under the UN Guiding Principles, the expected response to a harm you're linked to is to use your leverage to change it, before considering an exit. Each scan sets out a recommended position and the conditions that would justify ending a relationship. For shrimp from India, it recommends staying engaged, with named triggers such as documented retaliation against workers who raise complaints.

An action plan your teams can work from

Every scan ends with an action plan. Each action is tied to a specific issue and a time horizon, and names the team that would lead it.

Actions are grouped into three time horizons: zero to six months, six to 18 months, and 18 months onwards. Teams such as procurement, legal, compliance or sustainability can take the actions straight into the plans they already run.

Actions are also sorted by what it takes to deliver them: what you control directly, what you ask of suppliers, what needs other buyers or industry bodies, and what depends on public policy. That shows early which actions you can start on alone.

In a standard scan, the action plan is built for the country and commodity. You can also add your own supply chain data to the assessment, for an action plan tailored more closely to your business.

8 of the **17** actions in the India shrimp assessment are ones the buyer controls directly, so they can start without waiting for anyone else.

7.1 Immediate actions (0 to 6 months)

#	Action	Scope	Lead	Linked issue
2	Run ILO forced labour indicator audits at the highest-risk tier 1 sites, including contractor-employed workers	Buyer-cascaded	Compliance	5.1, 5.3, 5.6
3	Set up multilingual grievance channels, independent of suppliers and contractors, with a non-retaliation guarantee	Buyer-cascaded	Sustainability	5.1, 5.2, 5.3, 5.4
3	Update the supplier code: no worker-paid recruitment fees, no ID retention, wages paid into workers' own accounts	Buyer-controlled	Procurement, Legal	5.1, 5.3, 5.5, 5.6

Example: Three immediate actions from an HRIA Scan of farmed shrimp from India



Your scan is updated with each new version of the method

Your first assessment

Built on the current methodology version, with its version number on the report.

A new version is released

Improvements to the method and to the AI models, plus the latest EiQ country and product risk data.

Your re-run, later the same year

Built on the new version, with the new version number on the report.

The HRIA Scan methodology is released in numbered versions. Each new version brings improvements to the method and to the AI models it uses, and the latest EiQ country and product risk data. Every report records the version it was built on.

Each scan covers a year. You receive your first assessment on the current version, and a re-run later the same year on the next one, so you can show what has moved.

What you hold afterwards

A documented record of how the assessment was done and where its limits sit.

- ✓ Every issue considered, including those set aside, with the reasoning behind each decision
- ✓ A source register, with every source dated, graded for confidence and traceable
- ✓ A table matching each retained issue to the regulations that cover it
- ✓ An action plan, with each action tied to an issue, a time horizon and a lead team
- ✓ The methodology version the assessment was built on
- ✓ A limitations section stating what a desk assessment can't establish, issue by issue
- ✓ A disclosure of how AI was used in the research, and where practitioners reviewed it

The limitations section names the issues a desk assessment can't settle. That gives you a documented reason for going further on some countries and commodities and not others.

A1.2 Government and intergovernmental sources

Source	Date	Confidence	Use in this report
US Department of Labor, ILAB — List of Goods Produced by Child Labor or Forced Labor, 11th edition	5 Sept 2024	CONF A	India shrimp **added** for forced labour citing AP, migrant workers, debt bondage, restricted movement. URL: dol.gov/sites/dolgov/files/ilab/child_labor_reports/tda2023/2024-tvpra-list-of-goods.pdf
US Department of State — 2025 Trafficking in Persons Report, India chapter	2025	CONF A	India Tier 2 (maintained from 2024). Identified gaps in bonded labour identification and inter-state migrant protection. URL: state.gov/reports/2025-trafficking-in-persons-report/india/
US Department of State — 2024 Trafficking in Persons Report, India chapter	2024	CONF A	India Tier 2; baseline for 2025 comparison. URL: 2021-2025.state.gov/reports/2024-trafficking-in-persons-report/india/
US Department of State — Country Reports on Human Rights Practices, India	2024	CONF A	FoA legal environment; agricultural / informal sector exclusions; caste-based discrimination context
ILO NORMLEX — India country ratifications register	Accessed May 2026	CONF A	C29 ratified (1954); C87 / C98 not ratified; C138 ratified 13 June 2017; C182 ratified 13 June 2017; C190 not ratified
US Food & Drug Administration — Import Alert 16-129	20 May 2024	CONF A	Choice Canning Unit II added for nitrofuran (antibiotic) contamination; multiple entry-line refusals in 2024
MPEDA (Marine Products Export Development Authority) — Export Performance 2023–24	June 2024	CONF A	Frozen shrimp 716,004 MT / $4.88 bn (66.12% of seafood export earnings); vannamei production ~1.07 million MT; FY 2024-25 total seafood $7.45 bn. URL: mpeda.gov.in
EU Forced Labour Regulation (Regulation (EU)	Adopted	CONF A	Entry into force 13 Dec 2024; application

Where a scan says you need more

Some issues can't be settled from a desk. A scan names them and says what it would take to settle them.

That gives you a reason to go further on particular countries and commodities, based on the assessment rather than on whichever one is in the news. A scan is designed to run across many countries and commodities, so only the few that need it go on to the next tier. Each tier adds a different kind of evidence.

DESK

HRIA Scan

Reads EiQ data and published sources across every salient issue for one country and commodity. Fast, repeatable screening and prioritisation, checked by practitioners.

Typically within two weeks.

Where an issue can't be settled from a desk

ENGAGEMENT

HRIA Diagnostic

Adds interviews with people close to the issue, drawn from the stakeholder list the scan has built, to settle the questions it flagged.

Where the evidence has to stand up to challenge

FIELDWORK

HRIA Field

Adds work in country: site visits, worker interviews, and engagement with unions, management and local institutions.

Run across many origins

Go deeper on the few where it matters

Regulations a scan maps to

- ✓ UK Modern Slavery Act, section 54: in force
- ✓ US Tariff Act, section 307: in force
- ✓ German Supply Chain Due Diligence Act: in force, being replaced
- ✓ Norwegian Transparency Act: in force
- ✓ French duty of vigilance law: in force
- ✓ EU Forced Labour Regulation: from 14 December 2027
- ✓ EU Corporate Sustainability Due Diligence Directive: from 26 July 2029
- ✓ EU Corporate Sustainability Reporting Directive, ESRS S2 and S3: phased

About EiQ

EiQ is a supply chain risk and sustainability due diligence platform that helps global brands identify and manage labour, human rights and environmental risks across their supply chains. Its risk data covers more than 100 million data points across more than 1 million suppliers in 195 countries.

See an assessment before you decide

Ask for a walkthrough and a member of our team will take you through a completed assessment for one country and commodity.

Get in touch →

Visit **eiq.com** or email **eiq@lrqa.com**

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