



Brussels, 7 July 2025

To:

Commissioner Costas Kadis
Commissioner Roxana Minzatu

Subject: Social Partners' concerns on the Commission's approach to labour standards in the Regional Fisheries Management Organisations (RFMOs)

Dear Commissioners Kadis and Minzatu,

We are writing to you on behalf of the European Social Partners for Sea Fisheries — the European Transport Workers' Federation (ETF) and Europêche — to express our serious concern regarding the European Commission's current approach to crew labour standards within the Regional Fisheries Management Organisations (RMFOs).

Background

In early 2025, the European Commission submitted a draft proposal to the Indian Ocean Tuna Commission (IOTC) on labour standards for fishing crews operating in its area of competence. This draft proposal mirrors a text recently adopted by the Western and Central Pacific Fisheries Commission (WCPFC), which fails to meet the minimum requirements laid out in the ILO Convention No. 188 (C188) "Work in Fishing".

In response, the Social Partners jointly addressed a letter to DG MARE on 12 March 2025, clearly highlighting that the proposal significantly undermines international labour standards and was drafted without consulting those most directly involved — the Social Partners. The reply received from DG MARE on 25 March 2025, while recognising C188 as the ultimate goal, unfortunately endorses a "stepping-stone" approach based on substandard provisions and argues for a gradual path toward C188 compliance.

This issue was again raised during the meeting of the Sectoral Social Dialogue Committee for Sea Fisheries on 25 June 2025, where the Commission's representative reiterated the above-mentioned position that remains fundamentally divergent from the Social Partners' view.

Our concerns

We wish to underline in the clearest terms that this approach is unacceptable to the European Social Partners. We would like to draw your attention to the following key points:

1. C188 is a minimum floor, not a ceiling.

It sets the absolute baseline for acceptable working and living conditions in the fishing sector. Any

standard below ILO C188 is, by definition, substandard and should not be legitimised by the European Commission.

2. **Endorsing standards below C188 undermines both the Convention and the ILO itself.**
By tabling a proposal that dilutes these minimum protections, the Commission weakens the very international instruments it claims to promote. Moreover, the EU has transposed into its legislation a major part of C188 with Directive 2017/159.
3. **The “better than nothing” argument is dangerous.**
Setting an international precedent for labour provisions below C188 not only risks institutionalising those lower standards but also delays meaningful reform under the illusion of progress.
4. **STCW-F safety training standards must not be similarly undermined.**
The International Convention on Standards of Training, Certification and Watchkeeping for Fishing Vessel Personnel (STCW-F) sets important safety training requirements for fishers. The Commission is currently exploring the possible transposition of STCW-F standards into EU law through a Directive. If the same “stepping-stone” approach applied to C188 is replicated for STCW-F, it would risk significantly weakening international fishers’ safety standards. It is crucial that the EU’s internal and external actions remain consistent, ambitious, and aligned with international conventions.
5. **The Commission would be effectively allowing, endorsing, and promoting substandard working conditions.**
This damages the EU’s credibility as a global leader on decent work and human rights, particularly in light of its own internal standards and policies.
6. **Third countries will use this as a shield.**
Non-ratifying countries may cite these watered-down standards as sufficient, claiming compliance with sufficient labour standards even when they fail to meet the minimum set by C188.
7. **The Commission’s position contradicts its own Oceans Pact.**
In the recently published Oceans Pact, the European Commission explicitly committed to promoting the ratification and full implementation of international instruments (chapter 7), including the ILO Conventions on seafarers and fishers, as well as Fishing Vessel Safety Standards under the International Maritime Organisation (IMO). However, by endorsing substandard labour provisions at the IOTC and other RFMOs that fall below ILO C188, the Commission is undermining the very commitments it has made in this Pact. This inconsistency not only damages the credibility of EU external action, but also weakens the EU’s leadership in advocating for decent work and safe conditions in the fishing sector.
8. **Unfair competition and market recognition of social substandards**
Fleets that comply with C188 will be forced to compete against those claiming adherence to inferior standards, recognized by RFMOs. This not only distorts competition, as these products will be considered as socially sustainable by global markets and retailers, but also directly undermines the level playing field the EU strives to create and maintain.
9. **This could trigger a downward chain effect.**
If international RFMOs begin to codify lower labour standards, other countries and regions may follow suit, further isolating C188 rather than promoting it.
10. **DG EMPL must be consulted.**
Labour issues are within the remit of DG EMPL, yet it appears DG MARE has proceeded without ensuring proper cross-DG coordination. This is not acceptable.

11. The Commission must use its market leverage.

The EU is the second world's largest seafood market. It must use this influence to promote — not compromise — fundamental labour standards. Access to the EU market should be conditional upon respect for C188.

12. Social Partners were not consulted.

The EU's system of sectoral social dialogue is built on trust, transparency, and mutual respect. Bypassing the Social Partners when drafting proposals that directly concern working conditions in the fisheries sector not only contradicts this principle, but undermines the Social Dialogue framework itself. We insist that in future such matters, the Social Partners must be meaningfully consulted from the outset.

We therefore call on you, Commissioners, to urgently take prompt action and ensure that:

- The European Commission refrains from promoting labour standards below C188 in any international fora;
- DG MARE aligns its external action with the EU's internal legal framework and international commitments;
- DG EMPL is systematically consulted on matters with labour implications;
- The Social Partners are fully and genuinely involved in all future initiatives concerning working and living conditions in the fishing sector;
- The EU fully exploits its market power to raise the bar globally on fishers' rights and working conditions.

The European Social Partners remain committed to constructive dialogue and cooperation, but we cannot accept a course of action that weakens the global protection of fishing crews and undermines the international labour regime.

We thank you in advance for your attention and remain at your disposal for a meeting to further discuss this important issue.

Yours sincerely,

Livia Spera
ETF General Secretary

Javier Garat
President of Europêche

Cor Blonk
President of European Sea
Fisheries Social Dialogue
Committee