



Dear Mr Andresen Guimaraes,

The European Social Partners of the Sea Fisheries sector – ETF and Europêche– have been informed of the text proposed by the European Commission to the Indian Ocean Tuna Commission (IOTC) on crew labour standards. This proposal is meant to be presented at the IOTC meeting scheduled for 13-17 April in La Réunion, with the submission deadline set for tomorrow, 13 March 2025.

This proposal mirrors a text adopted by the Western and Central Pacific Fisheries Commission (WCPFC) in 2024, which was introduced by other WCPFC members.

The Social Partners are deeply concerned that the provisions intended to improve crew labour standards in this proposal fall below the standards set by the International Labour Organization (ILO) C188 "Work in Fishing" Convention, STCW-F, the Torremolinos Convention and UNCLOS. For instance:

- In the event of a serious injury or death of a crew member, the vessel is not required to cease fishing immediately but only "as soon as possible".
- Working time regulations are entirely absent.
- The obligation to allow crews to disembark regularly is subject to the laws and regulations of the flag State, potentially limiting crew members' rights.
- The absence of any obligation of medical care on board.

The European Social Partners emphasize that:

- The ILO C188 "Work in Fishing" Convention establishes fundamental standards to protect working conditions and safety aboard fishing vessels. These provisions must be considered the absolute minimum to ensure decent work in the fisheries sector.
- The European Union has transposed the C188 into EU law through Directive 2017/159, following the corresponding Social Partners Agreement.
- The European Union has further reinforced its commitment to labour rights through Directive 2024/1760 on corporate sustainability due diligence and Regulation 2024/3015 on products made with forced labour.

The European Social Partners find it unacceptable that:

- The proposed text significantly weakens working conditions compared to the obligations under C188.

- Although the proposed text references C188 in its preamble, it promotes standards that fall below its minimum requirements.
- The European Commission is endorsing substandard labour protections in an international context, contradicting the internationally recognized protections of C188.
- The Social Partners were neither consulted nor involved in the drafting of this proposal.
- The proposal undermines the role of C188 as a global benchmark for labour protection in the fishing industry, potentially allowing non-ratifying countries to justify lower standards by citing IOTC rules.
- Retailers could be misled and use this IOTC resolution to bypass C188 minimum labour protection standards, claiming they respect decent work condition in the sector.
- The European Commission is bypassing Member States' competences and prerogatives regarding labour regulations.

**For these reasons, the European Social Partners for Sea Fisheries jointly call on the European Commission to withdraw this proposal from submission to the IOTC.**

Europeche Deputy Director

Anne-France Mattlet



ETF Fisheries Section President

Juan Manuel Trujillo Castillo

