



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES
International Ocean Governance and Sustainable Fisheries
The Director

Brussels
MARE.B.2/MV

Subject: Reply to the letter on the proposal on crew labour standards in the IOTC

Dear Ms. Mattlet, dear Mr. Trujillo Castillo,

Thank you for sharing your concerns regarding the European Union's proposal on crew labour standards for the Indian Ocean Tuna Commission (IOTC). We appreciate the dedication of the European Social Partners of the Sea Fisheries sector – ETF and Europêche – in upholding high labour standards within the industry.

We would like to clarify that the European Union steadfastly considers the ILO C188 "Work in Fishing" Convention as the minimum standard for crew labour. Our commitment to ensuring welfare and safety in fisheries is evident through the transposition of C188 into EU law via Directive 2017/159 and our reinforced engagement with labour rights through Directive 2024/1760 on corporate sustainability due diligence and Regulation 2024/3015 on products made with forced labour.

However, we also recognize the global fisheries context where aligning international agreements more closely with ILO C188 can be a complex endeavour and a slow process with sometimes – unfortunately – very little progress. We were particularly appalled to read once more reports highlighting the persistence of conditions akin to slavery within certain third country fleets in the Indian Ocean.

Against this background and in line with our negotiation mandate, we consider the EU has a duty to raise the issue in the context of the next IOTC annual meeting. I agree with you that the standards recently adopted by the Western and Central Pacific Fisheries Commission (WCPFC) in 2024 are weaker than the approach defined by ILO C188, but it is also undeniable that they represent a first step in a context broadly characterised by the absence of any standard for most of the third-country fleets.

For this reason, on the basis of our internal consultation and taking into account your valuable advice, we decided to propose a two-step approach, by submitting a proposal that task the IOTC Working Party on Socio-Economics to promote the definition of specific IOTC standards, for their possible adoption at the 30th session of the IOTC.

This will provide us with the time to carry out the necessary consultation and to promote as solution that – while taking into account what is done by other RFMOs – could represent an intermediate step while we collaboratively work towards the ultimate goal, which is and remains the full implementation of ILO C188 across all fisheries.

Embracing this approach allows us to gradually enhance labour protections on an international scale, facilitating a smoother transition for those regions not yet prepared to fully adopt C188 standards. In this regard, I find it crucial to emphasize that we need to work towards realistic substantial progress; while the adoption of any future resolution will not impact our fleet – already operating under the stringent standards of C188 – it will compel competing fleets to elevate their own standards. This initiative is a vital step that, we hope, will encourage these fleets to embark on a journey toward the full implementation of C188 standards. In any case, as indicated, the EU will continue to advocate vocally and actively for the adoption by RFMOs of the standards contained in C 188.

Thank you once again for your vigilance and dedication to improving labour conditions in the fishing industry. We remain open to further dialogue and input as we work together towards implementing comprehensive and effective labour standards on a global scale.

Yours sincerely,



Fernando ANDRESEN GUIMARÃES

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