

ETF Reply to Commission call for evidence on EU strategy for fisheries external action

The ETF is fully aware of the importance of the external dimension of the Common Fisheries Policy (CFP). Fisheries is a global sector, and the EU, with its waters, fleet and market, as well as access arrangements, plays a fundamental role. We therefore strongly support the role the EU can play in strengthening the three dimensions of sustainability in global fisheries and in ensuring a fairer level playing field.

Sustainable Fisheries Partnership Agreements (SFPAs)

SFPAs are a fundamental tool through which the EU not only gains access to third-country waters but also projects its values, image and influence in the global fisheries sector. The purpose of the SFPAs should go beyond increasing the profits of the EU fleet: they must also contribute to promoting decent work and employment conditions across the fishing sector, while supporting sustainable fisheries worldwide.

The new generation of SFPAs and particularly their social clauses should not only align with, and promote, international labour standards in fisheries, but also ensure that non-EU fishers working on EU vessels benefit fully from European and national provisions on wages and employment conditions.

If proper protection for non-EU fishers employed on EU vessels is not put in place and effectively enforced, the EU risks being exposed for failing to uphold decent work and combat poverty and labour exploitation. Such a lack of protection would undermine the EU fleet's credibility when claiming adherence to high social standards.

When negotiating SFPAs, the EU is bound to respect the provisions of its own legislation and relevant international conventions, such as:

- ILO Convention 111 on Discrimination in Employment and Occupation
- Directive (EU) 2022/2041 on adequate minimum wages, as implemented in Member States
- the European Social Charter
- DIRECTIVE (EU) 2017/159, which implements the Social Partners' Agreement (SPA) to improve the working and living conditions of fishermen in the European Union, and is based on ILO Convention C188 (Work in Fishing Convention, 2007)

Regional Fisheries Management Organisations (RFMOs)

There is significant potential to strengthen the social dimension of fisheries within RFMOs.



It is unacceptable that, in such bodies, the European Commission has in the past supported or endorsed labour standards for crews that fall below international minimum standards, such as those set by ILO Convention 188, as happened with the (later withdrawn) proposal at the IOTC¹.

Such an approach not only undermines the role of ILO Convention 188 in protecting fishers' rights and working conditions globally, but also weakens the credibility of the ILO as an international institution. For this reason, the role of the EU and its Member States in RFMOs must be instead to promote the adoption and implementation of international minimum standards for the protection of fishers' labour conditions.

Moreover, the European Commission must not bypass Member States' competences and prerogatives regarding labour regulations in this context. We are also concerned by the lack of democratic scrutiny, for instance by the European Parliament, of the positions taken by the Commission in RFMOs.

Market as a Leverage

The EU should make full use of the size and influence of its seafood market to ensure that imports comply with minimum fundamental and sector specific international labour standards. Products originating from fleets or countries with a proven record of labour abuses or violations should be banned from entering the EU market.

If the EU applies strict rules to protect fish stocks through the IUU Regulation, the same principle must be applied to protect workers. In this respect, the Regulation prohibiting products made with forced labour and the Corporate Sustainability Due Diligence Directive should be fully enforced and extended to fisheries products.

Strengthening the Social Dimension of the CFP external action

In recent years, the social dimension of the CFP has been largely neglected. Yet fishing remains a dangerous profession, where serious labour abuses often occur at sea and go undetected.

The EU's strategy for the external dimension of the CFP represents a key opportunity to strengthen the social dimension and ensure the protection of fishers' rights and working conditions. By doing so, the EU can play a leading role in pushing all global fisheries actors to adopt higher standards and contribute to creating safer and more sustainable working environments for fishers worldwide.

¹ [Find here two letters addressed to the Commission by Fisheries Social Partners on crew standards in RFMOs](#)