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All Hands On Deck: Protections for Fishers in the Seafood Industry

REPORT

Purpose

This report is the fourth in a series on human rights in the seafood industry:

- 2022 – Human Rights and Environmental Due Diligence in the Seafood Industry
- 2023 – A Deeper Dive: Remedy and Recruitment in the Seafood Industry
- 2024 – Casting a Light on the Deep: Can Greater Transparency Protect Fishers and Save Our Oceans?

It is the product of a research practicum involving graduate students at American University's School of International Service (SIS), working in collaboration with the Fisheries Governance Project (FGP) and the Accountability Research Center (ARC) at SIS.

- FGP is a funder-practitioner collaborative focused on improving legal, market, and civil society governance of international fisheries.
- ARC bridges research and frontline perspectives to learn from and with membership-based organizations to inform strategies that improve public and corporate accountability.

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Fishers working in Thailand
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Abbreviations/Acronyms

AIS	Automatic Identification System
APIL	Advocates of Public Interest Law
ARC	Accountability Research Center
CBP	United States Customs and Border Protection
CMM	Conservation and Management Measures of the WCPFC
CSO	Civil Society Organization
C188	Int'l Labour Organization Work in Fishing Convention No. 188
C181	Int'l Labour Organization Private Employment Agencies Convention No. 181
C4ADS	Center for Advanced Defense Studies
DWF	Distant Water Fleet
EM	Electronic Monitoring
EPP	Employer Pays Principle
ESG	Environmental, Social, and Governance
EU	European Union
FAO	Food and Agriculture Organization of the United Nations
FGP	Fisheries Governance Project
FIP	Fishery Improvement Project
FISH	FISH Standard for Crew Certification Process
GPS	Global Positioning System
HRDD	Human Rights Due Diligence
ILO	International Labour Organization
ILAB	Bureau of International Labor Affairs
IUU	Illegal, Unreported, and Unregulated Fishing
MLC	Maritime Labour Convention
MOU	Memorandum of Understanding
MSC	Marine Stewardship Council
NGO	Non-Governmental Organization
NOAA	National Oceanic and Atmospheric Administration
NSM	National Security Memorandum
RFMO	Regional Fisheries Management Organization
SBMI	Serikat Buruh Migran Indonesia (Indonesian Migrant Workers' Union)
SIMP	Seafood Import Monitoring Program
TIP	Trafficking in Persons
UN	United Nations
USTR	United States Trade Representative
WCPFC	Western and Central Pacific Fisheries Commission
WRO	Withhold and Release Order

1. Introduction

Policy and practice are evolving quickly in business, human rights, and ocean sustainability, with more national and regional laws coming into force to protect migrant fishers' rights, prevent abuse throughout the recruitment process, and ensure fishers' access to remedy. Yet migrant fishers continue to face significant challenges as they navigate the multi-layered recruitment pipeline between their hometowns and the fishing vessels they seek to join. The complexity of the recruitment process creates ample opportunities for different parties to take advantage of them and makes it difficult for fisher unions to negotiate with employers. This makes corporate supply chain due diligence difficult and requires multiple layers of government enforcement.

This report analyzes fisher demands, emerging laws, and the corporate initiatives needed to connect fishers seeking remedy to the responsible parties. This is the fourth in a series of reports which track the evolution of human rights due diligence (HRDD) laws and corporate practice in the seafood industry. It is produced by three teams of graduate student researchers at American University's School of International Service (SIS) for the Fisheries Governance Project (FGP) and in collaboration with the Accountability Research Center (ARC).

There are several positive trends worth noting in the emerging legal obligations and corporate practices to ensure human rights in the seafood industry. A growing number of fishers are organizing to build mutual support and exercise their collective voice, resulting in a significant rise in fisher unions over the past ten years (Gearhart and Moynihan 2025). On the policy side, ratifications of the International Labour Organization (ILO) Convention 188 (C 188) on Work in Fishing doubled since 2019 and the world's largest Regional Fisheries Management Organization (RFMO) has incorporated labor rights criteria into its future monitoring agenda. Companies are also increasing their focus on fishers' rights; a majority now make a statement in support of the employer pays principle (EPP), which seeks to end debt bondage.

This report tracks these positive trends and examines what is needed to secure tangible changes for migrant fishers on the industrial and distant water fleets. For real change to reach fishers, significant reforms and improved implementation are needed. Fortunately, there has been a steady drumbeat of signals, with new policies passed in 2024 and 2025 that may prompt industry actors to change their approach. In addition to the uptake of ILO C 188, there are new laws such as the EU's forced labor import ban and a proposal for one in the UK, which are powerful incentives for industry to increase their monitoring of forced labor in global supply chains. In the US, government attention to labor rights abuses in the seafood industry has continued, albeit with a slightly different tenor under the Trump Administration. President Biden combined trade policy with funding for development programs and preventative measures, while President Trump is more singularly focused on trade policy to punish unfair labor practices that undercut US producers. In May 2025, the US issued a withhold release order banning the import of seafood from a Chinese vessel, the ZenFa7, found to have had fishers in forced labor conditions. That is the 6th fishing vessel blocked by a Withhold and Release Order (WRO), which means 25% of the WROs issued since 2020 are in the seafood industry.

This report includes three main sections, covering civil society perspectives, corporate programs, and policy solutions. Each section introduces analytic tools, diagramming processes or providing a comparative analysis of policies and programs, which highlight progress and remaining gaps in fisher rights protections. The conclusion provides a recap of key recommendations and a vision for how all three sectors – government, business, and civil society – could improve impact and more effectively work together.

The first section highlights civil society organizations (CSOs), the challenges they identify, and the solutions needed to strengthen rights protection for migrant fishers in the recruitment process. This section provides a detailed diagram of the multi-level recruitment process and the risks migrant fishers encounter at each stage. It explores how different CSOs provide support when fishers seek remedy and the differences between individual and collective worker voice mechanisms. The team considered a range of CSO initiatives, from tech-centered non-governmental organizations (NGOs) to worker-centered initiatives aligned with or led by trade unions. The goal was to analyze how these initiatives help fishers exercise their agency, and how fishers with a collective voice can protect their own rights and, potentially, the fisheries.

The second section includes a comparative analysis of seafood buyers' and retailers' approaches to ensuring fair recruitment of migrant fishers. The team gathered a range of perspectives and identified key criteria that corporations should include in their monitoring of migrant fisher recruitment. They conducted extensive web searches of corporate websites and other sources, which were expanded on by the ARC research team, to analyze the publicly available policies of 25 seafood buyers and 16 seafood retailers. Based on a multi-level review process, the team identified a range of corporate practices from those with no policy to those with elaborate implementation plans for protecting migrant fishers from forced labor and debt bondage. Using the key criteria identified, the ARC team evaluated corporate policies to identify what good practices look like and where more effort is needed.

Finally, the third section presents a policy analysis of international and regional treaties and agreements designed to protect the rights of fishers. This section includes a comparative analysis of key treaties designed to protect worker rights at sea, including ILO conventions and labor standards recently adopted by the Western and Central Pacific Fisheries Commission (WCPFC), the world's largest tuna RFMO. It considers the challenges to securing national implementation of such standards and reviews the potential protections offered by bi-lateral migration agreements. The section concludes with an assessment of how shifts in US trade policy priorities may affect migrant fishers. Trade pressure on bad actors will remain high, but cuts in aid may undermine preventive programs and US ability to detect abuse at sea.

The research teams used a three-pronged methodology – extensive literature reviews, data analysis, and extended interviews with more than a dozen industry experts – to identify how government, business, and civil society are advancing solutions to protect migrant fishers' rights. This report outlines gaps in protection and opportunities to improve oversight of recruitment practices and fishers' access to remedy.

2. Civil Society Perspectives: Remedy Pathways for Fishers and Fisher Involvement in IUU Reporting

CSOs have a critical role to play in preventing exploitation and ensuring fishers' access to remedy when their rights are violated. The following is based on a longer article forthcoming in American University's Journal of International Service (Goldman, Leonard, and Parker, Fall 2025). This section examines the systemic challenges migrant and distant-water fishers face in the global seafood supply chain, including exploitative recruitment, poor working conditions, limited access to remedy, and weak rights enforcement. The analysis highlights best practices in recruitment oversight, how NGOs and unions are helping fishers exercise their agency, and how fishers with a stronger voice can protect fishers' rights and, potentially, the fisheries. It focuses on two areas: (1) effective grievance mechanisms and steps companies can take to ensure fair, accessible processes, and (2) whether fishers can safely contribute to reporting illegal, unreported, and unregulated (IUU) fishing.

Despite exposés of forced labor and its correlation with IUU fishing, profit-incentivized cost-cutting within the seafood industry continues to encourage exploitative recruitment practices, jeopardizing worker safety and increasing risk of labor abuses (Gearhart (ed.) 2023). Both corporate policies and governmental regulations have sought to increase transparency, but many recruitment processes within the industrial seafood supply chain remain veiled, perpetuating the exploitation of a vulnerable workforce as fleets target migrant populations for recruitment.

While fisher unions fight for their members' rights to collective bargaining and grievance remediation, their efforts are hindered by a lack of transparency surrounding vessel ownership and opacity within the fisher-to-vessel recruitment pipeline (Gearhart (ed.) 2023). The complexity of this pipeline underscores the need to coordinate among CSOs, not only across data-driven and union approaches, but also across borders. An analysis of corporate policies discussed in the next section, however, found that few companies are grappling with these multiple layers, which require tracking both supplier vessels and the multiple recruitment agencies involved in the contracting process.

2.1 Recruitment: The Gateway for Fisher Exploitation

The process for fishers joining industrial and distant water fishing vessels is complex. Figure 1 below illustrates and identifies the risks migrant fishers face at each stage of the recruitment process. It shows how buyers need to review the labor practices of multiple recruitment agencies as well as the vessels supplying their fish. One recruitment agency is in the fishers' home country, or the recruitment state, and one is in the receiving country, or flag state (home of the vessel). Notably, this diagram portrays the recruitment process up to when the fisher boards the vessel, but it doesn't capture the repatriation process – a critical stage where many fishers face continued risks of exploitation and rights violations.

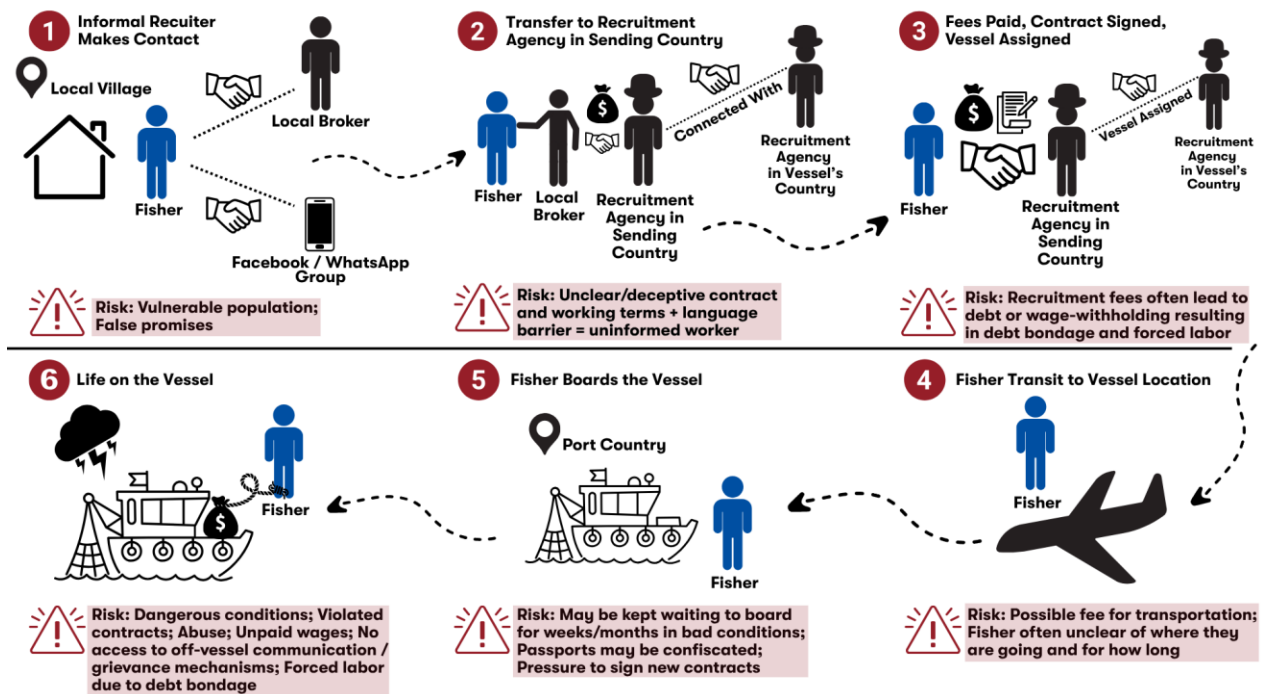


Figure 1: Recruitment pathway of a migrant fisher

Recruitment agencies often first reach prospective fishers through informal brokers who recruit young men within their local villages and receive a cut of the fisher's recruitment fees as compensation (Gearhart and Moynihan 2025). The Union of Indonesian Migrant Workers (Serikat Buruh Migran Indonesia, SBMI)—the largest migrant worker organization in Indonesia—noted that since 2017, many of these recruitment agencies are also posting job vacancies on Facebook and WhatsApp groups to reach their workforce. Labor abuses begin in this early stage of recruitment, as fishers are lured by false promises and coerced into signing misleading or inaccurate contracts.

Once connected, fishers rely on the recruitment agency in their home country for services such as help securing immigration documents and transportation to the vessel, which may or may not be docked in the vessel's flag state. Upon arrival in the port country, migrant fishers are transferred to a local recruitment agency, increasing the risk of incurring more fees. SBMI shared examples, noting that recruitment fees could amount to US\$1,200—a staggering sum for workers who may only earn US\$175 per month on the vessel.ⁱ These fees are a root cause of forced labor, as workers often take out high-interest loans to pay them, creating enormous amounts of debt (Gearhart and Moynihan 2025). Furthermore, fishers on distant-water fleets (DWFs) are often contracted and paid by their recruitment agency, affording agencies the power to deduct fees and any additional expenses from fishers' wages, trapping them in a cycle of debt bondage.

ⁱ Rizky Oktaviana, Ade Herlina, Feliana Fauziyyah, Juwari, Novia Kirana, Adrian Basar (SBMI), interviewed by Natalie Leonard and Elizabeth Parker, Zoom, July 17, 2025.

Recruitment is a critical entry point where migrant fishers often face the greatest vulnerability. Fishing vessel owners frequently rely on third-party recruitment agencies to staff their vessels, yet oversight of these agents remains weak and inconsistent (ETF 2024). Many fishers report having their passports confiscated, being misled about wages, or unknowingly signing contracts they cannot read (Gearhart and Moynihan 2025). The lack of standard legal safeguards, particularly in jurisdictions where recruitment agents operate with minimal or lax regulation, creates a breeding ground for abuse.

Non-binding practical documents that fishing companies are encouraged to use (e.g., toolkits, checklists, model contracts) include self-assessments for companies to complete before hiring. These toolkits recommend companies consider steps such as defining required qualifications, verifying agent accreditation, and checking for grievance mechanisms that are accessible to migrant workers (ETF 2024). Yet, gaps persist, especially for illiterate or non-native language speakers who may need legal interpretation or support services. True recruitment reform requires stronger compliance enforcement by flag states, formal mechanisms for worker complaints, and solutions that center the fisher's experience from the outset.

These recruitment practices impede fishers' ability to exercise their voice and rights to bargain collectively, access effective grievance mechanisms, and secure remedy. As fishers on the DWF are often contracted by the recruitment agency in their home country, and not the vessel owners directly, they are unable to bargain collectively with the captain or vessel owners for better working conditions (Gearhart and Moynihan 2025). Because they often work on vessels flagged to countries other than their own, tracing and holding abusive parties accountable is difficult. This situation complicates the ability of fishers and unions to file for and secure remedy, especially as recruitment agencies and vessel owners often try to avoid commitments to remediate grievances.ⁱⁱ Furthermore, in cases where migrant fishers' visas are tied to their employment, such as in Taiwan, fishers are often discouraged from transferring vessels, no matter the working conditions, for fear of deportation if their contract is terminated (Lee 2025).

2.2 Worker Voice

International labor standards are built upon the foundational principle that workers should have the right to organize, voice demands and negotiate for improved working conditions. The ILO's Declaration on Fundamental Principles and Rights at Work (ILO 1998) defines these respective freedoms—of association, organization, and collective bargaining—as basic workers' rights. Scholars define this ability of workers to express their concerns and exercise collective agency to improve the terms and conditions of their work as "worker voice" (Anner and Fischer-Daly 2023: 5). Mechanisms that most effectively enable worker voice are those that enhance workers' ability to elect, represent, protect, include, enable, and empower workers and their organizations, such as democratic trade unions and collective bargaining (Anner and

ⁱⁱ Rizky Oktaviana, Ade Herlina, Feliana Fauziyyah, Juwarih, Novia Kirana, Adrian Basar (SBMI), interviewed by Natalie Leonard and Elizabeth Parker, Zoom, July 17, 2025.

Fischer-Daly 2023). Within the global seafood supply chain, however, these tools are not always available to workers.

2.2.1 Individual vs. Collective Voice Mechanisms

In the fishing industry, there is a growing trend to adopt voluntary, market-driven governance mechanisms to address labor conditions in the seafood supply chain. These tools—including ethical standards, labeling systems, certification schemes, and codes of conduct—evaluate performance through social auditing strategies. However, these mechanisms have proven ineffective at transforming working conditions (Sparks et al. 2022). Tools such as audit surveys and complaint mechanisms may appear to be participatory by claiming to enable worker voice. Yet, they often fail to serve workers’ needs. Workers are rarely able to use these tools effectively, hindered by limited knowledge, lack of trust, and businesses’ dominant control over defining and resolving labor issues (Zajak 2017). These tools treat workers as passive, excluding the people they are intended to protect (Sparks et al. 2022).

The most effective forms of worker voice mechanisms promote collective, democratic representation, where workers are actively engaged, informed, and empowered. Individual voice mechanisms, like suggestion boxes and digital surveys, don’t carry the same power or credibility as collective voice mechanisms. Individual voice mechanisms are often ineffective at resolving workplace conflicts, especially those related to workers’ rights. For an individual voice mechanism, such as a hotline, to be helpful, it must complement a collective voice mechanism, like a democratic trade union (Anner and Fischer-Daly 2023). Improving working conditions requires incorporating workers’ voices at every stage of employment—from recruitment to repatriation—shifting from a ‘worker-centered’ to a ‘worker-driven’ model (Outhwaite and Martin-Ortega 2019; Issara Institute 2022a). This transition to a “worker-driven social responsibility paradigm” is critical to redistributing power and prioritizing worker agency within the seafood industry (Sparks et al. 2022: 3).

2.2.2 CSOs and Worker Voice

On both the international and domestic fronts, CSOs have a major role to play in reforming exploitative recruitment practices within the global seafood supply chain. CSOs, including trade unions, membership-based organizations, and NGOs, advance workers’ rights by strengthening community action and worker agency. Membership-based CSOs employ a ‘whole-of-worker’ approach, using strategies to prevent abuses, secure remedy, and support overall well-being by fostering community. SBMI indicated that their work goes beyond advocacy and includes supporting grassroots fisher organizing and educating migrant fishers on their rights at all stages of the employment process—from recruitment to work overseas and, when necessary, seeking remedy.ⁱⁱⁱ

ⁱⁱⁱ Rizky Oktaviana, Ade Herlina, Feliana Fauziyyah, Juwari, Novia Kirana, Adrian Basar (SBMI), interviewed by Natalie Leonard and Elizabeth Parker, Zoom, July 17, 2025.

Both the dangers of marginalizing worker voice and the importance of CSO support to amplify collective voice within global supply chains are exemplified by the 2013 Rana Plaza factory collapse in Bangladesh, which killed more than 1,100 people. Workers had limited union leverage to compel management before the tragedy, but with the right to freedom of association protected, union-driven reforms and defense of workers' right to refuse dangerous work might help prevent disasters like this (Freeman et al. 2018). Within the fishing industry, CSOs' support for and promotion of collective voice is pivotal to fishers exercising their power. The Global Seafood Alliance's 2022 report, *Worker Voice on Fishing Vessels*, highlights the massive power imbalance on fishing vessels and the need for safe, trusted support onboard and onshore (Global Seafood Alliance 2022).

CSOs promote collective voice through varied strategies, including employer engagement, advocacy, campaigning, grassroots organizing, and movement building. These efforts can be represented on a continuum—from fisher-absent NGOs that engage decision-makers to advance technical solutions with limited fisher involvement, to fully fisher-led unions. Understanding this spectrum of fisher involvement within CSO strategies helps contextualize the breadth of contributions to advancing fishers' rights.

In this report, the diverse work of the CSOs interviewed and CSOs identified through secondary research reflect this spectrum. C4ADS, known for its data-driven investigations into human rights violators and collaboration with private and public sector actors is tracking beneficial ownership of fishing vessels to help establish the responsible parties. Conservation International works with governments, companies, and communities to center advocacy and coalition-building. The Issara Institute, a Thai NGO, operates at the intersection of corporate engagement and fisher advocacy. Greenpeace, a campaign-driven CSO, focuses on public mobilization and corporate pressure. Stella Maris, a migrant-led organization, supports collective voice and rights education through port infrastructure and support networks. Finally, SBMI, a trade union, operates at the grassroots end of the spectrum, building collective power through worker organizing.

The strength of some CSOs closer to the fisher-absent end of the spectrum lies in their ability to contribute information or apply pressure that can help secure remedy for workers. Their technical experience and legal expertise, combined with external funding, allow them to help workers file complaints, escape debt bondage, and seek compensation for workplace abuses or injuries. However, this work may not have broader impact beyond the fishers helped if it is not connected to the work of trade unions and membership-based organizations focused on long-term organizing strategies. It's the movement building strategies that can cultivate collective voice—thereby advancing structural and more sustainable change (Gearhart and Moynihan 2025).

The literature reviewed suggests that systemic reform in the global seafood supply chain requires prioritizing collective fisher voice, strengthening organizing rights, and shifting power to fishers themselves. Recently, there has been an uptick in fisher organizing, with many trade unions emerging in the seafood sector. Still, challenges remain as many migrant fishers have

little to no organizing experience and unions struggle to secure membership, dues, and participation (Gearhart and Moynihan 2025).

2.3 Pathways to Remedy for Fishers

Remedy is central to achieving justice for fishers subjected to labor abuse and exploitation. It includes restitution, compensation, rehabilitation, and accountability measures. According to the UN Guiding Principles on Business and Human Rights, effective remedy must be legitimate, accessible, predictable, equitable, rights-compatible, and transparent (UN 2011). Yet in practice, remedy for migrant and distant-water fishers is often inaccessible due to legal loopholes, geographic isolation, and the failure of both state and corporate actors to implement robust grievance and remedy mechanisms. In response, a range of CSOs have stepped in to bridge the gap and provide legal aid to fishers. Notably, the worker-driven initiatives like trade unions aim to go beyond legal processes, working to build collective power through organizing, peer support, and advocacy for stronger legal protections (Gearhart and Moynihan 2025). Parhusip (2023) underscores the importance of localized, culturally informed engagement at ports, where intermediary actors can support fishers asserting their rights.

2.3.1 Strategies for Overcoming Challenges

Key barriers to fishers' ability to file grievances and secure remedy include debt bondage, document confiscation, and misinformation during recruitment, often via informal networks like Facebook (Parhusip 2023). There is also fear of retaliation, especially amongst fishers on DWF vessels, due to isolation. CSOs report cases in which workers faced blacklisting, physical threats, abusive punishments, or denial of disembarkation after reporting. Even where legal frameworks exist, enforcement is inconsistent, as agencies and vessel owners often evade liability through complex subcontracting arrangements. These conditions show why grievance systems must be trusted, accessible, and legally protected with independent oversight (Wilhelm et al. 2024; Sparks et al. 2022).

Despite obstacles, effective pathways to remedy do exist and are being developed for future implementation. SBMI has created a three-step grievance process, rooted in Indonesia's national labor law, starting with demand letters, followed by tripartite mediation, and, if needed, escalation through criminal complaints under trafficking statutes.^{iv} Their approach builds on peer networks, with many migrant workers returning to help others, making them trusted intermediaries with knowledge of national law and experience seeking remedy (Suwarno, Fritzner, and Gearhart 2024). While limited by funding and jurisdictional gaps, SBMI emphasizes that remedy must be continuous and supported not only by formal complaint channels but also by preventative efforts like legal orientation and pre-departure education. These outreach activities seek to prevent grievances by helping workers avoid exploitative recruitment and fostering their ability to speak out and exercise agency.

^{iv} Rizky Oktaviana, Ade Herlina, Feliana Fauziyyah, Juwari, Novia Kirana, Adrian Basar (SBMI), interviewed by Natalie Leonard and Elizabeth Parker, Zoom, July 17, 2025.

Technology is also a rapidly advancing tool for remedy, but it only succeeds when carefully implemented into broader systems to support worker grievances. Wi-Fi and electronic monitoring (EM) can enable communication, prevent document abuse, and enhance oversight (TNC et al. 2025; GLJ 2025). Also, complaint apps, such as Issara Institute’s Golden Dreams mobile app, allow workers to report abuse anonymously in multiple languages, demonstrating the promise of digital platforms particularly when they are paired with follow-up support. Still, connectivity issues limit the app’s reach, as Wi-Fi is rare on distant-water vessels. Expanding Wi-Fi on vessels is critical, requiring shared investment from governments, industry, and buyers, alongside policies linking communication access and anti-retaliation protocols to vessel eligibility. These technologies function best when integrated alongside port-based support, community-level organizing, and CSO facilitation to reinforce trusted, participatory pathways to remedy.

2.3.2 Recommendations on Remedial Pathways

Current remedy mechanisms for fishers remain fragmented, with many relying on hotlines and top-down audits that at best enable individual voice mechanisms but little systemic reform. Too often they extract information rather than empowering workers and connecting them to collective voice structures like unions. As a result, many pathways to remedy remain inaccessible, untrusted, and structurally disempowering (Anner and Fischer-Daly 2023; Issara Institute 2022b; Sparks et al. 2022; Wilhelm et al. 2024; Parhusip 2023). These systems are also hampered by language barriers, poor connectivity, and lack of enforcement, leaving workers with few safe pathways to report abuse. Effective remedy must rest on enforceable legal frameworks, be accessible at sea and onshore, and be co-governed by fishers. Remedy must also be viewed not as a one-time fix but as a continual, adaptive process responsive to the realities of fishers’ lived experiences.

Through expert interviews and the literature review, several core features surfaced of what successful remedy systems need to better serve migrant fishers. These include accessibility, confidentiality, anti-retaliation protections, worker input, and legal mandates. Strategies to improve access include:

- scaling pre-departure education and continuous dialogue amongst fishers and stakeholders
- integrating unions and other membership-based organizations’ grievance systems
- ensuring Wi-Fi and EM access on vessels
- mandating labor metrics in port inspections
- promoting greater transparency in recruitment and vessel ownership
- strengthening coordination among unions, NGOs, and fisher organizations.

Table 1 below highlights targeted strategies towards some of the most pressing barriers fishers face while at sea for long periods of time. While not exhaustive, this table illustrates examples of interventions that have proven promising or successful in specific contexts. The table also clarifies which actors are best positioned to implement each solution and highlights areas

where further investment or innovation is needed. It offers a practical reference guide for future remedy efforts and more strategic, coordinated responses. Overall, remedy must be grounded in fisher realities, not externally enforced frameworks.

Barrier/Risk	Description	Promising Solutions & Implementation Actors
Isolation at Sea	No real-time access to support or communication	Installation of Wi-Fi on vessels (The Nature Conservancy 2025; GLJ 2025) <i>Actors: Corporations, Governments</i>
Lack of Union Support	Fishers not covered by labor agreements	Expansion of Migrant Fisher Unions (Gearhart and Moynihan 2025) <i>Actors: Corporations, Governmentst</i>
Debt Bondage and Recruitment Fraud	Workers indebted before arriving on vessel	ILO C 188 Implementation (ILO 2007), Recruitment fee reimbursement programs, Employer Pays Policy (Issara Institute 2022) <i>Actors: CSOs, Corporations, Governments</i>
Confiscation of Documents	Captains withhold passports to control workers	ILO C 188 Implementation; Prohibition of document confiscation (ILO 2007) <i>Actors: CSOs, Governments</i>
Language and Legal Illiteracy	Workers unable to understand or invoke their rights	Pre-departure and onboard legal orientation (e.g. SBMI; unions; worker centers) <i>Actors: CSOs, Governments</i>
Fear of Retaliation	Risk of violence or dismissal for reporting abuses	Anti-retaliation protocols in grievance mechanisms (GLJ 2025) <i>Actors: Corporations, Governments</i>
Threat of Immigration Enforcement	Undocumented workers fear being reported	Trusted CSO intermediaries to report complaints anonymously, <i>Actors: CSOs</i>
Blacklisting / Job Loss	Workers who complain may be excluded from future employment	Union-backed dispute resolution and blacklisting protection. <i>Actors: CSOs</i>
Mental and Emotional Stress	Stress from abuse, isolation, and lack of remedy	Peer networks, Wi-Fi connection to friends and family, and union support. <i>Actors: CSOs</i>

Table 1: Targeted solutions to address barriers to remedy

2.4 Strategies to Expose IUU Fishing: What if Worker Voice Were Truly Free?

“IUU has been recognized by the United Nations as one of the seven major threats to world maritime security” (Leonardo and Deeb 2022:1). In an ideal world, if fishers were able to communicate with trusted representatives without fear of reprisals, they might help address IUU fishing.

Advocates have argued that where labor rights abuses are identified, it should trigger IUU investigations. Fishers, often closest to such violations, could help report IUU fishing, if they had the freedom and protection to speak out. Though still a nascent concept in combating IUU fishing, fishers' proximity to both human rights violations and legal infractions gives them a potentially valuable role in fostering transparency and accountability within seafood supply chains, if they could safely participate.

Chapsos and Hamilton's (2019) study of Indonesian IUU networks shows how hard this would be. Based on data from over 2,000 trafficked fishers, they show how IUU operations often rely on

deceptive recruitment, forged documents, and coercive control to secure compliant labor and evade regulation. Another study concludes that trafficked fishers, if given protections, could serve as key witnesses to expose criminal fishing networks (Leonardo and Deeb 2022).

Illegal, Unreported, and Unregulated Fishing

IUU is defined by the Food and Agriculture Organization (FAO) as:

1. Illegal Fishing refers to fishing activity carried out without permission by foreign vessels in waters under the jurisdiction of another state, or in any other way that violates that state's fisheries law and regulations;
2. Unreported Fishing refers to fishing that is not officially recorded; and
3. Unregulated Fishing refers to fishing activities carried out in areas where no applicable management measures exist. (Leonardo and Deeb 2022: 1).

Figure 2: Definition of IUU fishing

Tech-oriented solutions are making some progress. The *2025 Monitoring for Change Report* (TNC et al. 2025) found that EM using cameras, sensors, and GPS, can capture images that may indicate labor abuse or unsafe practices at sea, but the approach faces challenges because of costs; it requires significant capacity to review and act on the data gathered. Meanwhile, fisher-led reporting also remains risky. Greenpeace USA experts interviewed stress that expecting vulnerable fishers to monitor IUU without training, protection, or support is unrealistic and potentially dangerous.^v They highlighted dangers like retaliation, blacklisting, job loss, and violence (TNC et al. 2025). Recruitment conditions exacerbate fears; debts, lack of contracts, and identification make fishers reluctant to speak out. Social and moral pressures also discourage reporting. Without legal protections, labor enforcement, and CSO support, fisher-led reporting is often unsafe and infeasible.

2.5 Conclusion

The recruitment supply chain is complex, requiring multiple strategies to mitigate risks. Safe, effective fisher-led reporting requires legal protections, recruitment oversight, anonymous

^v Charli Fritzner, Sari Heidenreich (Greenpeace), interviewed by Elizabeth Parker, Natalie Leonard, and Carlye Goldman, Zoom, July 2, 2025.

reporting mechanisms, and remediation pathways. Long-term success also hinges on fishers' ability to build power and strengthen their collective voice.

CSOs vary in approach. Some favor collective bargaining and unionization, others prioritize individualized grievance channels like hotlines or digital platforms. Despite these differences, many agree that centering fisher voice and agency is essential. Within this broader ecosystem, CSOs can play a vital role as facilitators, watchdogs, and advocates, ensuring fisher-led reporting is both possible and protected. If these groups can coordinate successfully and ensure effective protection for fishers who seek to speak out, they might also find pathways to preventing IUU.

To address the challenges outlined above, three central reforms consistently surfaced throughout desk research and targeted interviews:

- Governments and companies must support fisher organizing and enable collective worker voice at every level of supply chain, including involving representative fisher organizations in policy design and ensuring technologies like Wi-Fi and EM are implemented to serve fishers' needs.
- Recruitment systems must be reformed to eliminate debt, increase contract transparency, and hold brokers accountable.
- Access to remedy must be enabled through grievance systems that are anonymous, multilingual, trusted, and backed by legal enforcement mechanisms with companies taking proactive steps to ensure grievance systems are fair and accessible.

All in all, true change will require sustained, structural shifts that redistribute power to the people most impacted by exploitation. Fishers are not just sources of labor or victims of abuse. They are essential rights-holders who, given the knowledge and experience, can drive ethical reform. Fishers could also be allies in the fight to end IUU fishing, but to do so, they need a voice and the means to raise concerns without fear of retaliation. Protecting fishers' rights is not only a legal imperative, but a practical necessity for building a just and sustainable seafood industry.

3. Corporate Accountability and Human Rights Due Diligence in the Seafood Sector

Seafood retailers and producers, long pressured to address the environmental sustainability of their practices, are increasingly looking at the social sustainability of their supply chain. This section presents findings on human rights due diligence (HRDD) practices within the global seafood supply chain, with a focus on corporate transparency in recruitment policies. The research evaluates both suppliers and retailers, emphasizing how companies disclose and implement recruitment practices to prevent forced labor.

Analysis of major US retailers, including Costco, Target, Walmart, Whole Foods, and others shows a majority acknowledge responsible recruitment principles in public-facing policies. Walmart, for example, publicly endorsed the EPP and outlined a detailed set of Responsible Recruitment Expectations that explicitly prohibit worker-paid recruitment fees and define expectations for labor brokers (Walmart 2025). While many companies articulate values aligned with international labor standards, however, most still need to provide concrete mechanisms for enforcement, such as transparent verification procedures or worker grievance systems that secure remedy for abused workers.

The team interviewed stakeholders from NGOs, certification bodies, and businesses on the types of commitments corporations are making to ensure the uptake of fair recruitment processes. While many companies have expressed public commitments to uphold human rights, their policies are often a vague reference to human rights norms. Even for companies publishing more detailed policies, there is little reporting on their implementation and the oversight mechanisms they use. Given the complexity of the recruitment process and the potential for abuse, corporate initiatives need transparent data collection on hiring processes and all the intermediaries involved in recruitment. These gaps underscore the urgent need for expanding traceability systems beyond environmental data to include labor indicators and recruitment disclosures (Friends of Ocean Action 2022).

3.1 Assessing Recruitment Policies

This research sought to identify the presence or absence of recruitment policies across both seafood suppliers and major retailers and to analyze available reports on the implementation and verification of those policies. It assesses: (1) the extent to which seafood suppliers and retailers publicly disclose their recruitment policies and practices; (2) the presence and quality of hiring and recruitment-related information in human rights due diligence reporting; and (3) whether certifications and data tracking currently capture labor-specific indicators.

To develop an assessment approach, the team analyzed how certification initiatives cover social issues, conducted a series of expert interviews, and reviewed academic and practitioner literature. Based on this, the team identified a set of evaluation criteria for analyzing corporate policies and reports. The team then conducted extensive web searches to review the policies and reports posted by 25 of the seafood buyers analyzed previously by the World

Benchmarking Alliance (WBA 2023) and the 16 leading retailers evaluated by Greenpeace (Fritzner and Ritchie 2024). Both of those reports draw on corporate surveys covering environmental and social issues. The goal of this research, however, was to take a granular look at what information is available publicly about seafood industry efforts to protect the rights of migrant fishers throughout the recruitment and hiring process.

3.1.1 Certification Schemes and Recruitment Risk Assessments

Most certification programs covering industrial and distant water fishing present strong environmental credentials but offer little or no detail on recruitment practices or protections for the rights of fishing crew. Marine Stewardship Council (MSC) is the most frequently cited certification system (mentioned by 22 of the 25 suppliers), but they and other verification programs like Fishery Improvement Projects (FIP) or Japan's Marine Eco-Label prioritize ecological outcomes over labor conditions. MSC certifications are often considered the gold standard for environmentally friendly seafood and some in the industry were looking for MSC to also cover social issues. In August 2014, MSC introduced a policy excluding from certification fisheries where there were incidences of forced labor convictions (Human Rights at Sea 2020). In 2018, MSC took a further step by requiring all certified fisheries to submit a labor statement declaring their compliance with basic labor rights (Tindall et al. 2022). In September 2024, however, MSC announced it would step away from making fair labor claims to refocus on its core mission: tackling overfishing and addressing the environmental threats facing the ocean (MSC 2024).

Although MSC's initial efforts signaled a growing recognition of the need to integrate social responsibility, particularly labor protections, into sustainable seafood certification, the MSC was widely criticized by activists and academics (Thai Seafood Working Group 2019; Sparks et al. 2022; Nakamura 2024). Notably, MSC-certified vessels have been linked to labor rights violations, including a high-profile 2020 case in which MSC faced scrutiny after a fisheries observer was found dead under suspicious circumstances aboard a Taiwanese vessel covered by an MSC certification (Lout 2023). This movement away from social sustainability reporting creates a gap in compliance verification services but seemingly responds to concerns that sustainability certifications may overlook or obscure labor abuse, potentially making matters worse for workers (Nakamura, Ota, and Blaha 2022).

One initiative that is focused on fishers' rights and welfare is the Fairness, Integrity, Safety, Health (FISH) Standard for Crew, which launched in 2021 with primarily industry leaders on their board. It has faced significant criticism from fisher rights advocates. The FISH Standard is a certification scheme that focuses specifically on corporate-led social responsibility in seafood. Version 1.2 of the Standard is organized around four principles: 1) socially responsible labor practices and ethical behaviors; 2) fair conditions of service for all fishers; 3) health and safety of all fishers; and 4) decent accommodations, water, and food (FISH 2024). It is based on ILO C 188 and includes provisions such as fair recruitment and placement, freedom of association and collective bargaining, and occupational health and safety. Certificates are valid for three years and in October 2025, 11 companies received FISH Standard certification. Six of the certified

companies have a seat on either the FISH Standard’s board of directors or its Standards Oversight Committee (FISH 2025). Of the seafood suppliers reviewed for this report, only one subsidiary of Nueva Pesca Nova (which sits on the FISH Standard board) received a FISH Standard certification.

The FISH Standard notes that the purpose of this certification is for business-to-business communication as compared to other consumer labeling schemes. It is also voluntary and nonbinding in nature. When it was launched, the FISH Standard received immediate criticism from the Seafood Working Group, which cited a long list of criticisms, including: the lack of a meaningful role for workers and/or their representatives; a reliance on third-party audits; no commitment to remediation; the lack of a chain of custody mechanism; selective application of international standards; defaulting to weaker national standards; a failure to recognize power imbalances between employers and employees; and conflicts of interest (SWG 2021). Since 2021, the FISH Standard has released two revisions (versions 1.1 and 1.2), but some of the structural problems highlighted by the SWG persist.

One example of a lingering problem is the FISH Standard’s stance on recruitment. Section 1.6 does prohibit recruitment fees but allows recruitment costs to be covered by fishers so long as they are legal, in the fisher work agreement, done with consent, and do not result in forced labor. Notably, ILO C 188 requires that: “no fees or other charges for recruitment or placement of fishers be borne directly or indirectly, in whole or in part, by the fisher” (ILO C 188: article 22, clause 3b). The FISH Standard language creates a potentially confusing loophole that opens a door to debt bondage and withholding wages – both indicators of forced labor – and reinforces the SWG’s critiques that the FISH Standard is non-binding and applies international standards selectively.

These findings reveal a critical gap in the sustainable seafood movement: while environmental benchmarks have progressed, social responsibility and labor protections remain inconsistently addressed. They also show diverse perspectives on certification-based solutions, something that was also echoed by several of the experts interviewed.

3.1.2 Interviews with Seafood Industry Experts

To complement the review of certification initiatives, the research team conducted semi-structured, in-depth interviews with seafood industry experts representing a range of perspectives—particularly those engaged with certifications, advocacy, and corporate sourcing. Interviews included representatives from three NGOs – FishWise, Greenpeace, and MSC – each having a range of perspectives on certifications, with Greenpeace being publicly critical and MSC having certifications at the core of its mission. Interviews also included one with a seafood supplier, Oddisea, and one with a seafood retailer, Walmart, which further helped the team develop a set of criteria for evaluating corporate policies on recruitment. Throughout the course of the interviews some common themes arose, outlined below:

- Consistent support for ethical recruitment practices, including adoption of the EPP

- Acknowledgement of and the desire to reduce the specific vulnerabilities unique to migrant fishers
- Acknowledgement of the importance of building avenues for labor organizing within migrant fisher communities (voiced by four of the five interviewees)
- The importance of traceability and supply chain transparency as a key factor in mitigating IUU abuses
- The need for seafood buyers and retailers to engage with vessel captains, vessel owners, and seafood producers (exporters) to prevent IUU fishing and unethical labor practices in a way that drives improvement but does not result in the termination of business relationships.

Similar to the findings discovered during the public data analysis discussed below, migrant fisher recruitment is not often prioritized in discussions of how to improve HRDD in seafood supply chains. At first interviewees often raised topics such as Wi-Fi availability, transshipment, and port access, but when the interview questions narrowed in on migrant fisher recruitment, they voiced support across the board for ethical recruitment practices. There was an acknowledgement by all parties regarding the vulnerabilities specific to migrant workers, as well as a desire for these conditions to be improved. A significant part of this remediation included support for the EPP, which multiple interviewees included as a pivotal piece of the solution to reducing abuses against migrant fisher recruits. The EPP, created by the Institute for Human Rights and Business, states that “no worker should pay for a job—the costs of recruitment should be borne not by the worker but by the employer” (IHRB 2025). While there was broad support for this principle and ethical recruitment as a whole, there was frequent mention of the complex and sometimes opaque nature of global seafood supply chains that present unique challenges to the implementation of the EPP.

Throughout the interviews, the industry representatives highlighted traceability and supply chain transparency as key factors in mitigating IUU abuses. One interviewee cited transparency and the technology that facilitates it as the key factors to gaining oversight of the entire supply chain starting at the recruitment level. Upon further discussion, however, interviewees commented that there is insufficient data available about which recruitment agencies work with which vessels. So even with transparent vessel tracking, the recruitment agencies contracting the workers often remain unknown. In addition, there is not sufficient information available related to validation of recruitment agency practices to ensure they treat migrant fishers fairly.

Finally, all interviewees voiced the need for both seafood retailers and buyers to actively engage with suppliers and fishery management initiatives to prevent IUU fishing and unethical labor practices. They noted retailers have a responsibility to drive improvement, but in a collaborative way, one that avoids auditing processes that trigger the immediate termination of relationships. All the interviewees, except for Greenpeace, mentioned MSC and FIPs as avenues for retailers and suppliers to continue to support fishery improvements. Although MSC has backed away from covering social criteria, some FIPs have incorporated social criteria. Yet most are mainly focused on environmental sustainability improvements, and there is minimal focus

on labor or social improvements. Moreover, the labor disclosures in FIPs are voluntary and self-reported and can fail to prevent labor violations (Williams 2024). When asked about which mechanisms are used to ensure supplier or fishery labor improvements, the interviewees pointed to company specific solutions, versus relying on external mechanisms.

In addition to the concerns with voluntary social audits, several interviewees noted the financial challenges related to implementing improvements. The cost of these improvements often land mainly on the fishing vessels, which may have a detrimental impact on workers' salaries. For example, one of the interviewees cited Wi-Fi implementation as a costly service, the financial burden of which may theoretically be passed on to the workers, especially in highly competitive and low-margin supply chains, such as the tuna supply chain. Others argued that this is why corporate parties need to engage with their supply chain partners to help cover these costs.

Overall, the interviews show that the plight of migrant workers is well known throughout the industry and there is vocal support for improvements to the systems intended to protect them. The question then becomes: what policies and practices can help push for, implement, and consistently validate the effectiveness of fisher rights protections? In the following sections, this report will analyze publicly available information via corporate websites, NGO reports, and industry publications to determine how recruitment practices are included in corporate policies, statements, and reports and the extent to which each company seeks to verify implementation.

3.2 Online Review of Seafood Buyer and Retailer Programs

Overall, the research goal was to evaluate how key players in the seafood industry monitor recruitment and labor rights issues in their supply chain. The research team conducted an in-depth review of 16 seafood retailers from Greenpeace's *The High Cost of Cheap Tuna* (Fritzner and Ritchie 2024), which represent a significant slice of the \$40 billion global tuna market, and 25 of the leading seafood suppliers reviewed in the World Benchmarking Alliance's 2023 Sustainable Seafood Index report.

To find relevant content, both web pages and downloadable PDFs were searched using the following recruitment-related keywords. These keywords helped identify specific references to recruitment practices, migrant worker protections, and contracting procedures.

"agency," "agencies," "audit," "bondage," "contract," "debt," "employer pays principle," "fee," "forced," "forced labor," "foreign worker," "grievance mechanism," "human rights," "labour," "language," "migrant," "pay," "recruitment," "slavery," "whistle blowing."

Through these searches, the team found each company's policies, reports, and programs discussing how they monitor recruitment practices and mitigate abuses in the recruitment pipeline sending fishers to work in their supply chain. The primary sources of information and the type of information found are described in Table 2.

Source Type	Description
Governance / Corporate Policies	Pages with Codes of Conduct, Ethics Policies, or Business Responsibility Statements
Sustainability Reports	Usually under tabs labeled sustainability, ESG, people, social commitment, or human rights
Commitment / Responsibility Pages	Sections outlining high-level values, principles, or goals related to labor and recruitment

Table 2: Scope of document and webpage review

The overall analysis reveals significant gaps in how labor rights, especially recruitment practices, are addressed across the industry. Several key themes emerged from the review process, including:

- rarity of specific, verifiable implementation processes
- broad adoption of the EPP
- weak or absent grievance mechanisms
- lack of worker-led initiatives
- imbalance favoring environmental goals over social protection
- lack of transparency or consistent reporting across the seafood industry.

This report does not publish specific rankings for individual seafood suppliers because a) the goal was to develop a trend analysis on transparency and b) not all seafood suppliers have public reporting. To publicly evaluate supplier policies would require targeted surveys and/or interviews with each to ensure all policies are retrieved and reviewed. This was beyond the scope of this project. Where published policies were available, as was the case for three of the seafood suppliers, those are cited by name along with relevant publications. For the same reasons, only seafood retailers with relatively strong public policies are cited in section 3.3.2.

3.3.1 Seafood Supplier Policies and Implementation

To evaluate the seafood suppliers, the team developed a three-level policy assessment framework against which companies were evaluated. Each company's materials were evaluated based on whether and how well they addressed eleven issues, which were identified through interviews and the literature review. These included:

1. Commitment to uphold the EPP
2. Provide clear explanations for any fee inquiries
3. Enforce strict recruitment agency oversight
4. Contracts are written in languages understood by crew
5. Ensure safe, adequate worker accommodations
6. Maintain transparency of fishing vessel operations
7. Guarantee crew freedom of movement onboard
8. Allow unrestricted access to personal documents
9. Address the process of repatriation

10. Protect freedom of association and collective bargaining rights
11. Provide confidential, retaliation-free grievance procedures

After entering the relevant phrases and related policies or reports into an Excel sheet, the team evaluated the quality of the companies' positions in all eleven categories and provided a summary grade on three levels: 0) no policy; 1) a general statement on human rights; 2) a specific policy on recruitment, especially that claims to apply to the whole supply chain; and 3) recruitment policy and evidence of implementation. Each company was evaluated by two researchers who then discussed any differences and took an average of the two scores. Figure 3 summarizes the findings.

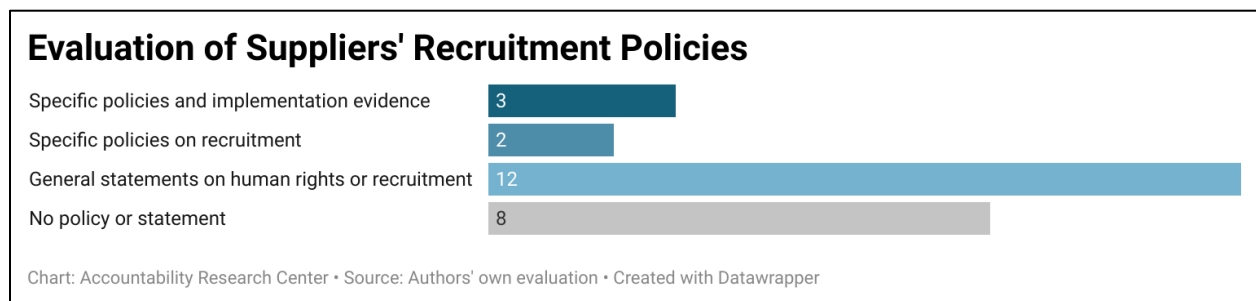


Figure 3: Analysis of 25 of the 30 suppliers on the WBA Sustainable Seafood Index

Of the 25 companies reviewed, eight were given a zero for having no statement, 12 had a basic statement, two had a policy, and three showed some form of implementation and/or verification. This means that over two-thirds of the companies reviewed had at least a statement on many of the dimensions reviewed. While this was a positive sign, most lacked clear expectations for recruitment procedures to protect migrant fishers or examples of implementation in their supply chains. Many made vague statements on human rights or recruitment, but these statements rarely detail what those fees include or who is responsible for covering which fees.

Three companies published detailed recruitment policies, however, that include both clear expectations and specify implementation or verification mechanisms. FCF, Royal Greenland, and Thai Union all published policies that provided clear commitments to fair recruitment that outline policies covering all or most of the 11 criteria identified through the literature review and interviews. Despite having significantly more detailed and transparent policies than most of their peers, three issues reveal the challenges and some lingering contradictions in those programs. The first relates to understanding recruitment fees, the second how grievance systems may or may not enable worker voice, and the third is the lack of recruitment agency tracking currently mandated in supply chain policies.

Recruitment Fees versus Recruitment Costs

One difficult issue is how to define recruitment fees and recruitment costs and which ones are permissible. Although it's helpful when companies have detailed policies on recruitment fees, there appear to be some contradictions with the EPP and international guidelines such as those laid out by the European Transport Workers' Federation (ETF 2024). Thai Union begins by

supporting the EPP but then provides a list of certain costs that migrant workers are expected to cover such as paying for the pre-departure training venue. For example, their recruitment policy states that the company pays for pre-departure training, but they also indicate that the workers pay for the pre-departure training venue (Thai Union Group 2024).

Another problematic clause in Thai Union's policy concerns repatriation expenses. Despite being one of the only major companies to explicitly lay out which costs it does expect workers to cover, Thai Union includes in this list the repatriation of migrant workers in the case of a "voluntary resignation prior to completion of their employment contracts" (Thai Union Group 2024: 5). Due to the often very high costs of repatriation and isolated working conditions, this creates vulnerabilities for forced labor for workers as such costs would make leaving early prohibitively expensive. Thus, even those companies with detailed corporate policies in place there is incongruence between professed values and actual policy details.

Another example of the confusion of who pays for what appears in the policies of FCF Co. Ltd. FCF states that "crew members shall not be charged recruitment or employment-related fees" but then adds a caveat: "*other than those permitted by laws*" (FCF 2022: 8). The laws of Taiwan, the country in which FCF is based, explicitly allow for "foreign person fees" (Ministry of Labor of Taiwan 2017). Article 6 of Taiwan's *Standards for Fee-charging Items and Amounts of the Private Employment Services Institution* permits monthly service fees for "expenses required for undertaking designated employment services matters, including transportation costs for receiving and sending off foreign person(s)" (Ministry of Labor of Taiwan 2017 as translated by Ling and Chen 2025: 5). Such expenses can amount to ~50-60 USD per month (Ling and Chen 2025). Despite the Ministry of Labor of Taiwan declaring in September 2024 that they prohibit brokers charging migrant worker recruitment fees, the official Taiwanese position is to "view migrant borne recruitment fees and related costs as an extraterritorial problem arising from private parties in migrant workers' countries of origin", beyond its jurisdiction (Ling and Chen 2025: 5). This appears to ignore potential abuses by the recruitment agencies in the sending country and to directly contradict the standard of EPP.

Grievance Mechanisms and Worker Voice

Another important area where policies are contradictory or potentially ineffective is in the area of grievance mechanisms. Most companies reviewed (20 out of 25) at least mentioned a grievance mechanism, such as a 24-hour hotline or whistleblower channels. The three companies providing detailed reports posted information about how they engage third party organizations in the grievance process.

- FCF's mandates full vessel transparency as a prerequisite to verifying legal compliance (FCF 2022). Its *Workers' Voice Project*, developed with the Taiwan Seamen and Fishermen's Service Center (SFSC), offers a confidential grievance channel, supported by a QR-code-enabled digital platform via e-Audit Services, which communicates workers' grievances with all stakeholders, including recruitment agencies and the authorities.

- Thai Union enforces a *Fishing Vessel Code of Conduct*, conducts third-party vessel audits, has a mapping of all recruiters and agencies, and maintains a 24/7 grievance hotline, called Ethics Point, which is open to workers and third parties alike.
- Royal Greenland’s due diligence includes recruitment risk assessments, oversight of third-party agencies, direct fisher engagement, and accessible grievance channels.

It’s not possible to conclude from a desk review the extent to which these grievance mechanisms enable worker voice and the extent to which they engage fisher unions or other forms of collective worker voice. The Global Seafood Alliance, for example, identifies a broad range of tools for promoting worker voice such as hotlines, industry social audits, fishing vessel grievance procedures, and communications and technology (Global Seafood Alliance 2022). However, the research provided in section 2 makes the distinction between top-down approaches that may engage individual worker voice and more sustainable approaches to collective worker voice that can support workers and overcome their fear of reprisals.

Tracking Recruitment Agencies – Sending and Receiving

Tracking the vessel often does not go far enough to protect fishers. The recruitment agencies from the fisher’s home country and the vessel’s flag state country must also be tracked. Sometimes there may be transit state recruitment agencies, which should also be tracked. The Fisheries Governance Project’s Defining Corporate Duties document cited below advocates for retailers and seafood buyers to track the recruitment agencies used by their supplier vessels.

Issue	Direct actions sought from Retailers, Buyers, and Importers	Requirements for Suppliers: Processors, Vessel Owners and Operators, Recruitment Agencies
Recruitment (see also forced labor) (General Principles and Operational Guidelines on Fair Recruitment, ILO C 181 on private employment agencies, and other relevant ILO standards.	• Publish annually the list of recruitment agencies supplier vessels use. • Identify the costs of recruitment and how those are paid. • Establish a contractual agreement with suppliers to provide financing or financial incentives to cover recruitment expenses.	• Report annually on the recruitment process, the costs, and how related costs are covered. • Commit to the employer-pays principle so that no recruitment fees or related costs (including but not limited to repatriation costs) are charged to, or otherwise borne by, workers, regardless of what is legally allowed.
Refer to the forthcoming ILO Guidelines on Fair Labour Market Services for Migrant Fishers)	• Publish and uphold a policy to prohibit workers being charged recruitment fees, including access to remedy when workers have paid fees.	• Provide proof of payment showing recruitment-related costs were paid by the company.

Table 3: Excerpted from “Defining Corporate Duties in Seafood Supply Chains to Prevent IUU Fishing & Labor Rights Abuse on Industrial Fishing Vessels.” (FGP 2025: 24)

The FGP Corporate Duties document also asks all parties, retailers, buyers, and suppliers to report on costs and the financing agreements in place to ensure employers are paying those costs. Table 3 makes clear that suppliers should report annually on their recruitment processes, including associated costs and how those costs are covered. In addition to committing to the EPP, companies are expected to provide evidence of recruitment fee payments. Research from corporate interviews shows that this level of transparency is achievable, but it ultimately depends on a company's willingness to absorb these costs and demonstrate accountability.

3.3.2 Retailers

To assess the transparency and commitment of seafood retailers regarding ethical recruitment, the authors conducted an in-depth analysis of major grocery retailers' websites. The initial retailer list was gathered from Greenpeace's *The High Cost of Cheap Tuna* report and covers the overwhelming majority of US annual grocery revenue (Fritzner and Ritchie 2024). The review covered publicly available seafood supply chain and labor recruitment policies of major US-based grocery retailers by examining information published on their corporate websites—environmental, social, and governance (ESG) reports, supplier codes of conduct, and responsible sourcing statements. The web searches focused on whether companies disclosed recruitment practices and prohibited forced labor and outlined retailers' expectations of suppliers related to seafood sourcing. This included US-based companies which are leaders in the sector such as Aldi, Target, Walmart, Wegmans, and Whole Foods. Public disclosures on recruitment policies, forced labor prohibitions, and supplier expectations were reviewed. Encouragingly, each of these five retailers explicitly mentions recruitment and affirms their stance against forced labor. For instance, Walmart publishes extensive documentation on its Responsible Sourcing program and supplier standards, stating that all recruitment-related fees must be borne by the employer (Walmart 2022). Similarly, Target's 2022 ESG report outlines its policies to eliminate unethical recruitment practices (Target Corporation 2022).

Other prominent US grocery retailers have fewer or less detailed disclosures specifically addressing seafood supply chain recruitment practices as compared to those listed above. Some referenced human rights or general supplier standards but offered limited or no recruitment-specific language. Others provide no publicly available information on labor recruitment in their seafood supply chains. This separation between the two groups highlights the uneven nature of corporate policies and reporting on recruitment issues in the seafood supply chain, where some retailers are advancing more robust public commitments to ethical recruitment, while others lag.

More than half the companies reviewed have a policy to address recruitment-related risks. Although this is a sign of progress, most companies fall short in disclosing concrete implementation processes or measurable outcomes. Even among more transparent actors, such as Aldi, Walmart, and Whole Foods, limited evidence exists of direct monitoring of recruitment agencies or formal channels for worker feedback. Though it references recruitment in its sustainability commitments, Aldi appears to lack a clear oversight framework or enforcement mechanisms. The absence of detailed procedures and reporting, such as third-

party audit results, grievance systems, or corrective action protocols, highlights a recurring gap between corporate policy and practical accountability. These findings reinforce this project's central concern that corporate statements often present a façade of responsibility without the operational substance necessary to ensure ethical recruitment throughout seafood supply chains.

3.4 Conclusion

This analysis reveals that while some of the seafood industry's leading suppliers and retailers acknowledge the importance of ethical recruitment in principle, meaningful action remains limited and inconsistent. To protect fishers, especially migrant fishers, future progress must include clear and detailed recruitment policies, consistent implementation measures, worker-driven grievance mechanisms, and a shift towards labor-inclusive human rights due diligence. True sustainability in the seafood sector cannot exist without accountability for the people who bring seafood to market. Additional research and discussion are needed to improve upon the recruitment policies analyzed above, but an initial set of measures that seafood suppliers and retailers should take follows.

For suppliers:

- Disclose supply chain details down to the vessel, farm, or processing facility level, identifying *all* recruitment intermediaries used.
- Clarify recruitment and labor policies in publicly available documents, specifying expectations for both flag state and crew (sending) state labor brokers, especially in high-risk corridors.
- Make transparent whether workers are charged recruitment-related fees, and outline steps being taken to ensure and verify implementation of the EPP.
- Benchmark recruitment and remediation policies using established frameworks such as the Fisheries Governance Project's *Defining Corporate Duties* document and publish annual progress updates.
- Disclose social audit findings or third-party assessments, including corrective action plans with timeframes and follow-up procedures.
- Collaborate with civil society to verify conditions across recruitment corridors and improve worker voice mechanisms.

For retailers:

- Establish supplier requirements that mandate recruitment policies, beyond endorsement of the EPP, to trace and monitor recruitment pipelines.
- Integrate responsible recruitment indicators into supplier scorecards, ensuring that ethical labor practices impact sourcing and procurement decisions.
- Provide co-financing and reward suppliers that have credible recruitment policies that are verifiable and grounded in stakeholder engagement.

4. Policy Frameworks, Implementation, and Enforcement

This section explores the policy systems and structures that protect, or sometimes fail to protect, migrant fishers in the distant-water fishing industry from labor and human rights abuses. The research highlights the specific accomplishments and shortcomings of a multi-layered governance system. It considers international frameworks, such as the Maritime Labour Convention (MLC) or ILO C 188 on Work in Fishing and regional developments, like the Western and Central Pacific Fisheries Commission's (WCPFC) Crew Labour Standards and bilateral migration agreements (BLMA). The section concludes with an analysis of how these efforts may be impacted by changing US policies and an international order marked by uncertainty over US engagement and leadership.

4.1 International Policy

Forced labor and human trafficking within the distant-water fishing industry represent a severe human rights and governance crisis. Migrant fishers, who often come from vulnerable communities, are isolated at sea and face significant risks stemming from complex recruitment processes, lack of legal protections, and inadequate enforcement mechanisms. Despite the challenges of monitoring labor conditions on vessels operating far from national jurisdictions, there is increasing pressure on corporate actors to conduct more rigorous HRDD throughout seafood supply chains. This evolving landscape of governance is shaped by documented patterns of labor abuse, systemic enforcement failures, and international efforts to establish accountability.

Migrant fishers are disproportionately vulnerable to exploitation due to multiple structural factors. Isolation at sea severely limits communication with family, government authorities, and civil society groups, while language barriers and undocumented status further hinder access to legal protections. Recruitment agencies frequently operate with minimal transparency, charging exorbitant fees that can trap workers in debt bondage, and sometimes providing fraudulent or misleading contracts, as described in section 2 above.

The ILO has established 11 indicators of forced labor, several of which, such as withholding wages, deception during recruitment, excessive overtime, and physical abuse, have been widely documented in the fishing industry. This is often compounded by other abuses such as limitations on fishers' rights to organize and bargain collectively. These abuses form a consistent pattern across regions and have been increasingly documented through survivor testimonies, which play a vital role in raising awareness and driving policy reform.

The enforcement of labor standards in fishing remains weak and fragmented at the national level. Key obstacles include inadequate port inspections, jurisdictional loopholes caused by the widespread use of flags of convenience, corruption, and insufficient penalties for employers who violate labor laws. Thailand's experience illustrates these challenges. In 2019, the country ratified ILO C188 and took steps to end IUU leading the EU to lift its yellow card. However, more

recent reporting shows that serious gaps in enforcement, wage protections, and inspections persist (EJF 2024). In Indonesia, labor abuses have been documented on industrial vessels operating within the country's Exclusive Economic Zone, which primarily employ Indonesian nationals (Azis 2025). While these fleets do not typically hire international migrants, labor brokers can mislead internal migrants and serious concerns have been raised about poor and abusive working conditions and lack of regulatory oversight (Azis 2025).

In response to systemic enforcement failures, governments and international organizations have initiated several interventions aimed at improving labor conditions. In Indonesia, the ILO launched joint labor inspections in 2021 focused on the domestic industrial fleet, which has faced persistent labor abuse (ILO 2021). While not specifically targeting foreign distant-water vessels, these efforts mark a step toward strengthening oversight. There is also growing momentum for broader ratification of ILO C188, which provides a comprehensive framework to protect fishers' rights. Multistakeholder collaborations involving governments, NGOs, and industry actors have promoted awareness and pushed companies to adopt HRDD across seafood supply chains (ILO 2021; Pew 2024; Greenpeace 2020). Yet enforcement remains inconsistent and accountability mechanisms are often underdeveloped, even in countries with relatively progressive policies (Pew 2024). These weaknesses highlight the ongoing need for capacity building, political commitment, and international cooperation. The next section explores how three international agreements could help guide improvements in the industry.

Central to these efforts is ILO C188, which articulates fishers' rights to fair wages, decent working conditions, occupational safety, medical care, and rest periods. Despite its significance, ratification and enforcement of the convention remain uneven across fishing nations. As of 2025, only 24 countries have ratified C188—13 of them since 2018—reflecting a gradual but still limited uptake, particularly among major fishing states (ILO 2025). The MLC, by contrast, is the most comprehensive international instrument on labor rights at sea; however, it applies only to merchant seafarers and not to fishers or crew members in the fishing sector.

Fisher organizers note that employers advocated excluding fishers from the scope of the MLC. Employers argued that fishing is a very different, less predictable type of work than what is involved in seafaring, which tends to have more standardized hours and wages. Fishing requires the crew to adapt their hours to when the catch is abundant. This can benefit fishers if they earn a percentage of the catch and the captain is honest, but it can also result in greater abuse of rest time and safety standards. ILO C188 provides protections specific to the fishing industry. Still, as with all ILO Conventions, C188 relies on national-level implementation, which means even after ratification its practical enforcement varies widely depending on each country's political will and institutional capacity.

Thus, while international legal frameworks such as ILO C188 provide a necessary foundation for protecting migrant fishers, their efficacy depends upon their incorporation into national laws and the presence of robust enforcement infrastructure. Persistent challenges in monitoring and compliance underscore the urgency of enhancing international cooperation and supporting capacity building at the national level. The analysis below includes a comparison of C188, the

MLC, and the WCPFC labor standard for crew to identify complementary strengths and structural gaps in each instrument.

4.1.1 Maritime Labor Convention 2006

The Maritime Labor Convention (MLC) was adopted in 2006, with a planned entry into force in August 2013 (Mantoju 2021). At the time, it was a revolutionary piece of international legislation that sought to improve working and living conditions for seafarers. By 2020, the MLC had been adopted by over 95 countries and covered up to 90% of the world's shipping fleet (Mantoju 2021). All State Parties that are signatories to the treaty are legally obligated to integrate the following protections:

- The minimum requirements for seafarers to work on a ship
- The conditions of employment
- Accommodation, recreational facilities, food, and catering
- Health protection, medical care, welfare, and social security protection
- Compliance and enforcement mechanisms.

Following ratification of the Convention, compliance verification is completed by port state control (PSC) systems (Mantoju 2021). These systems have been present in maritime law since the early 20th century and are typically used as a second safety measure for the identification of substandard ships. In the context of the MLC, the PSCs are intended to ensure that vessels flying the flag of countries party to the convention are operating within the guidelines first laid out within the 2006 treaty. The systems are also meant to ensure ships are following regional Memoranda of Understandings (MOUs) among countries to monitor enforcement, compliance, and efficacy of verification regimes.

Studies monitoring PSC statistics from seven of the nine MOUs noted that the incidence of noncompliance declined over an eight-year period (Mantoju 2021). The study also acknowledged, however, significant variations among the MOUs, which can indicate a further need for harmonization of PSC procedures to ensure consistent conditions and enforcement measures. This finding bolsters one of the main criticisms of the MLC: that it relies too much on guidance and politically binding assurances that State Parties will properly integrate protections for seafarers (Safety4Sea 2024). The inconsistent implementation and monitoring of the MLC make it difficult to measure a consistent positive impact. This shows that increased collaboration to address enforcement gaps between States Parties is needed to ensure fair and equitable implementation across the maritime industry.

4.1.2 International Labour Organization Convention 188

ILO C188 extends many, although not all, of the MLC protections to those who were previously unprotected by the MLC. It creates binding conditions to address the primary issues concerning work on board fishing vessels. These include occupational safety and health and medical care at sea and ashore, rest periods, written work agreements, and social security protection at the

same level as other workers. It aims to ensure that fishing vessels are constructed and maintained so that fishers have decent living conditions on board (ILO 2007). Additionally, it helps to prevent unacceptable forms of work for all fishers, especially migrant fishers. States that have ratified C188 commit to exerting control over fishing vessels through inspection, reporting, monitoring, complaint procedures, penalties, and corrective measures, and may then also inspect foreign fishing vessels visiting their ports and take appropriate action if violations are found.

Although ILO C188 extends protections towards fishers, it offers fewer enforcement capabilities than the MLC. First, ILO C188 has fewer States Parties that have ratified the convention than the MLC. Additionally, C188 also holds fewer articles than the MLC. Nevertheless, ratification of ILO C188 has been shown to enhance human rights standards for countries that are party to the convention (Suharnata 2024). While it might lack the same thorough provisions of the MLC, C188 can still address gaps within a nation's legal authorities by requiring a clear and coordinated implementation plan, strengthen protections on both domestic and foreign vessels, and generally enhance human rights protections. Additionally, states' legislation to complement C188 can further strengthen protections for both domestic and migrant workers (ILO 2017).

4.1.3 Western Central Pacific Fisheries Commission CMM 2024-04

The WCPFC was established in 2004 to manage highly migratory fish stocks in the Western and Central Pacific Ocean. In 2024, the WCPFC adopted the Conservation and Management Measure for Crew Labour Standards (CMM 2024-04). These standards mirror those of the MLC and ILO C188, but improvements can only be made if States Parties either seek to create complementary legislation, or work with other parties within the WCPFC to ensure regulation and consistent monitoring. Unfortunately, CMM 2024-04 has yet to enter into force (expected 2027) so its effectiveness has yet to be determined.

The WCPFC is an RFMO that oversees the largest tuna fishery in the world, includes Pacific Island nations as core members, along with major fishing powers such as the US, China, and the UK, as well as observers from UN agencies. The WCPFC has established advanced systems for monitoring environmental indicators, which allow the WCPFC to collect high-quality data from all compliant ships in the region.

Table 7 shows the relative coverage of the three internationally negotiated agreements. The categories were based on the MLC because it is the most robust and far-reaching of the treaties. By creating a side-by-side comparison, it's easier to see the gaps in issues covered. Annex II displays the precise paragraph and text of each of the provisions where applicable.

The potential added value of the WCPFC's labor standards is that these tools may strengthen labor monitoring and because it is a regional agreement it may encourage neighboring countries to cooperate and hold each other accountable. It will be important, however, that these standards align more fully with the ILO standards.

	Provisions	MLC 2006	ILO C188	CMM 2024-04
1	Minimum age requirements	✓	✓	
2	Medical certificate	✓	✓	
3	Training and qualifications	✓	✓	✓
4	Recruitment and placement	✓	✓	
5	Employment agreement	✓	✓	✓
6	Wages	✓	✓	✓
7	Hours of work and rest	✓	✓	✓
8	Right to leave with pay	✓		
9	Holiday leave with pay	✓		
10	Right to repatriation	✓	✓	✓
11	Manning levels	✓	✓	
12	Accommodation	✓	✓	✓
13	Food and catering	✓	✓	✓
14	Wi-Fi access	✓		
15	Right to medical care on board	✓	✓	✓
16	Shipowner's liability	✓	✓	
17	Health and Safety and Accident Prevention on Board	✓	✓	
18	Access to shore-based welfare facilities	✓	✓	
19	Social Security	✓	✓	

Table 4: Comparative overview of major multilateral seafaring labor regulations

To implement these labor standards, the WCPFC intends to use many of these same monitoring systems, including:

- Port state notifications, used by officials to conduct targeted ship inspections
- Electronic monitoring, providing real-time documentation of onboard conditions
- Observer reports, providing third-party accounts of labor practices
- High seas boarding inspection reports, used to conduct inspections on the open sea
- Information provided by crew members, including firsthand reports that support grievance investigations.

Some might argue that this is an over-extension of the RFMO's mission that goes beyond its authority, but APIL notes that member states are obligated to implement labor standards under multiple international treaties. These include the Universal Declaration of Human Rights, the ILO Declaration on the Fundamental Principles and Rights at Work, the UN Convention on the Law of the Sea, and the FAO Code of Conduct for Responsible Fisheries (APIL 2022).

These new labor-centered initiatives by the WCPFC offer many potential benefits to migrant workers in the distant-water fishing industry, as they utilize existing on-ship monitoring systems

and acknowledge the intersectional links between environmental and labor concerns. However, these mechanisms alone may prove insufficient. Because the labor standards apply only after vessels leave port, it fails to address the recruitment and pre-departure phase, where debt bondage and document confiscation most often occur. While greater transnational collaboration could help bridge this gap, the non-binding nature of WCPFC policy, which leaves implementation to the discretion of member states, could limit its practical effectiveness (Otumawu-Apreku et al. 2024).

4.2 Bilateral Cooperation to Protect Migrant Fishers

Broad international frameworks such as ILO C188 establish common standards for countries, whether they are official signatories or not. While some agreements, like the MLC, have succeeded in implementing systems like port state controls to work toward upholding the standards, the distant-water fishing industry requires multiple mechanisms to govern shared resources. Unilateral national policies have often failed to achieve measurable improvements. Bilateral and regional systems like the WCPFC, however, may help encourage cooperation among countries that might otherwise compete for the same resources and the same markets. The development of mutual agreements, such as through bi-lateral MOUs on migration protections, has shown some promise.

Bilateral agreements between labor-sending and receiving countries like Indonesia and South Korea are common. Yet due to transnational complexities in distant-water fishing, these agreements have been almost exclusively limited to land-based workers (Gokkon 2022). These challenges are compounded in recruitment, when multiple recruitment agencies are involved and some are registered outside the jurisdiction of both countries. Recently, however, these agreements have been framed as efforts to protect migrant fishers.

The following agreements are a representative sample of bilateral cooperation illustrating key mechanisms and priorities:

- 2021 Indonesia and South Korea MOU, establishing a government-to-government recruitment system that became the basis for later Korean policies introducing grievance mechanisms, mandatory port-calls, and enforcement measures such as contract termination and quota reductions (Ministry of Oceans and Fisheries 2021; Ministry of Oceans and Fisheries 2024).
- 2022/2023 Indonesia and Spain Mutual Recognition Agreement, confirming joint certification and electronic validation of licenses, with mutual recognition of training centers and authority to inspect vessels (Republic of Indonesia and Kingdom of Spain 2022).
- 2024 Indonesia and China Joint Statement on Advancing the Comprehensive Strategic Partnership, primarily addressing IUU fishing, but including provisions relevant to monitoring labor conditions (Yu and Liu 2025).
- Proposed Indonesia and Taiwan MOU, in negotiations since 2022, building on collective bargaining agreements, employment payment of recruitment fees, and coordinated

grievance mechanisms and investigations of abuses (Indonesia Ocean Justice Initiative 2024).

Apart from the Indonesia and China Joint Statement on Advancing the Comprehensive Strategic Partnership, these agreements aim to reduce the influence of recruitment agencies through mutual certification and collaborative enforcement. The following are key components of recent bilateral agreements:

- **Certifications:** Recent labor agreements promote collaborative electronic certification and licensure of fishing vessels, allowing joint authentication and monitoring of vessels with migrant crews (Destructive Fishing Watch Indonesia 2024). Some, like China, have pushed for joint commissions on maritime affairs (Yu and Liu 2025).
- **Education and Training Facilities:** During the pre-departure process, Indonesian fishers undergo specialized training programs under many bilateral agreements to build skills and promote labor-rights awareness (IOM-Indonesia 2023: 10).
- **Recruitment Fees:** To reduce debt bondage, bilateral agreements can require employers to cover passport, ticket, and agency fees, as in the South Korea–Indonesia MOU (IOJI 2024: 29; IOM-Indonesia 2023: 10)
- **Grievance and Enforcement Mechanisms:** Agreements increasingly include vessel inspections, onboard communication access, and government-coordinated reporting channels; (DFW 2024; IOJI 2024: 17).

Despite the promising frameworks of these recent bilateral agreements, they have largely failed to achieve measurable results. A 2023 investigation of South Korea’s MOU implementation found serious gaps in several key areas including: recruitment fees, with most respondents reporting payments to agencies; passport confiscation, reported by 100% of respondents; and grievance mechanisms, of which 92% of respondents were unaware (APIL 2023).

While these MOUs reflect legal alignment with international norms, they have struggled due to weak enforcement and lack of implementation. These gaps in recruitment oversight and enforcement create an opportunity for regional mechanisms, such as RFMOs, to complement bilateral efforts with broader monitoring and compliance tools.

Ultimately, bilateral and regional organizations can play an important role in providing concrete structure for implementation of weak or unratified national commitments. Bilateral migration agreements offer legal specificity while RFMOs have enforcement and monitoring potential. Yet without market incentives and engagement from key market economies like the US, these initiatives will fail to fully meet their objectives. Even in countries where political will exists to advance stronger protections for migrant fishers, economic pressures may win out in a context where neighboring countries compete and underbid each other to attract international buyers that constantly seek lower prices.

4.3 International Trade Pressure and the Role of the US

US demand for seafood is second only to the EU in terms of the value of seafood imports (FAO 2025). It is thus a driving force with potential to either fuel or deter IUU and forced labor. The US initially approached the issue through conservation policies but has increasingly included labor rights in its priorities, especially under the Biden Administration. Although still early in the second Trump Administration, the current ‘America First’ foreign policy approach and severe reductions to federal agencies are clear signals that fisher rights advocates should anticipate new policy approaches to addressing labor abuses in supply chains. The following will analyze the frameworks used by the Biden and second Trump Administration to address migrant fisher abuse to understand the policy shifts that can be used to inform advocacy strategies. This section draws on a review of laws and policies and interviews with five experts in US trade policy.

4.3.1 Policy Approach Under the Biden Administration

The Biden Administration viewed the seafood industry through four lenses: a) national security, b) labor rights, c) climate change, and d) economy. A ‘whole of government’ approach was adopted and was primarily defined by the following policies.

- The National Security Memorandum-11 (NSM-11) (Biden 2022: 1), President Biden’s memorandum on IUU, characterized IUU as contributing to climate change and connected the issue to forced labor, which was viewed as a national security and economic threat. NSM-11 mandated executive agencies to coordinate actions through:
 - *The Interagency Working Group on IUU Fishing* (established under the SAFE Act (NOAA [ca. 2025])), chaired by the National Oceanic and Atmospheric Association (NOAA) mandated to guide and coordinate a 5-year strategy to address IUU (2022 to 2026) and submit annual reports to Congress.
 - *The Forced Labor Enforcement Task Force* (established by the United States-Mexico-Canada Agreement Implementation Act) for the US to enforce section 307 of the Tariff Act to ban imports that use forced labor in coordination with other agencies.^{vi}
 - *The Trafficking in Persons (TIP) Task Force* (established under the Trafficking Victims Protection Act) (U.S. Congress Public Law No: 106-386), chaired by the Secretary of State to coordinate federal agencies, NGOs and international partners to assess, equip, and advise on anti-trafficking efforts.
 - Collaboration among the Customs and Border Protection (CBP), Departments of Commerce and State, USAID, and the US Trade Representative (USTR) and other relevant agencies to combat forced labor through trade negotiations.

^{vi} The US-M-CA was the first trade agreement to oblige other trading partners to implement a forced labor import ban and it is an approach recently replicated in the October 2025 US-Malaysia Reciprocal Trade Agreement.

- *Expansion of the US Seafood Import Monitoring Program* to include more fish species and better technology and policies to trace IUU fishing.^{vii}
- The Collaborative Accelerator for Lawful Maritime Conditions in Seafood (CALM-CS) (NOAA Fisheries 2024) was a response to Biden’s call for public-private partnerships in the NSM-11. This working group included government, civil society, and private sector representatives collaborating to address abuses in the seafood industry.

4.3.2 Policy Approach Under the Trump Administration

During the first Trump Administration, the US government participated in and funded (through USAID) the Seafood Alliance for Legality and Traceability, a global alliance of public and private entities to trace IUU and forced labor, which continued during President Biden’s term (Fishwise 2023). He also signed the Maritime SAFE Act into law in 2019, which established the Interagency Working Group that also gained traction under Biden.

The current Trump Administration recently issued an Executive Order 14276, “Restoring American Seafood Competitiveness” (Trump 2025). This EO reaffirmed Trump’s commitment to combatting IUU but frames the issue as an *economic* rather than a human rights or conservation issue. Forced labor is mentioned in the EO but the only specific direction in addressing it is for the USTR to include forced labor as part of its trade negotiations. The EO’s primary objective is to strengthen the domestic fishing industry, combat IUU through the Seafood Import Monitoring Program (SIMP), and ensure the “integrity of the supply chain” in tandem with deregulation of the domestic seafood industry. The primary goal for addressing migrant fisher abuse is to promote security and protect the US domestic economy. The EO suggests that human rights abuse in the seafood industry may not be the primary focus, but accountability mechanisms for foreign individuals or entities that compete with the domestic seafood industry by using forced labor could be targeted.

The Interagency Task Force, coordinated under Biden, has not been dismantled as of this report’s publication but has been directed through the EO to collaborate with the USTR and Secretary of Commerce to develop a trade strategy that will improve access to foreign markets for US seafood (Trump 2025). The USTR is mandated to examine the trade practices of countries that are known for IUU and forced labor as part of the supply chain. The Secretary of Commerce will also be evaluating SIMP to determine possible revisions.

US foreign aid has been drastically cut, however, which will affect programs that address migrant fisher abuse as well as data to inform relevant US policy. The Department of Labor’s International Labor Affairs Bureau (ILAB) and its programs have been sharply curtailed. Specifically, ILAB, which upholds global labor standards, monitors supply chains, and provides grants to support efforts to address labor abuses has had substantial reductions in funds

^{vii} Notably, the expansion of species was rescinded in 2023 due to public pressure (National Oceanic and Atmospheric Administration 2024) but CSO advocacy did lead to other NOAA improvements.

(Economic Policy Institute 2025). As a result, three current ILAB grant holders (Solidarity Center, Global March Against Child Labour, American Institutes for Research) are suing the Department of Labor (Solidarity Center et al. 2025).

With the significant reduction of US agencies and their partnering entities to provide on-the-ground monitoring and technical assistance, there will be less support for programs to prevent and develop more rigorous protections for migrant fishers on the international fleet.

Correspondingly, the data and information gained through the network of relevant foreign entities will also be curtailed, which may result in less informed US policies to address IUU in trade negotiations and foreign imports. In spite of these limitations, the CBP is continuing to implement the Uyghur Forced Labor Protection Act (UFLPA) and sections 301 and 307 of the Tariff Act to issue WROs against ships known to have forced labor. Two import bans have been implemented so far targeting sea salt from a farm in South Korea and seafood from a Chinese fishing vessel owned by Zheng Fa Trading (US Customs and Border Protection 2025).

4.3.3 Potential Tools to Be Used

Under the current administration, there is no clear foreign policy agenda coming directly from the executive branch that centers the elimination of human rights abuses in the supply chain. Rather, advocates and fisher groups will need to identify the policies that address forced labor and align with Trump's priorities, specifically policies that prioritize the domestic economy and national security. Several experts interviewed highlighted two policy tools that could be promising in addressing human rights abuses. First, Forced Labor Import Bans (under the UFLPA and the Tariff Act) may be one of the best options currently, even if they are a last line of defense. Second, trade negotiations by the USTR may be a significant pathway for compelling states to enact regulatory and accountability mechanisms.

If only one country is enforcing import bans, however, containers can easily be rerouted and purchased in a different market. 'No Safe Harbor for Forced Labor' should be enforced for products using forced labor. The UK passed the Modern Slavery Act in 2015 and, more importantly, the EU adopted a forced labor import ban in November 2024. There is an appetite for new regulatory mechanisms, which are endorsed by CSOs. Currently, the Coalition Against Forced Labor in Trade – a 17-organization coalition from different regions and countries – has come together to advocate for adoption of forced labor import bans in OECD countries. The USTR was specifically highlighted in Trump's 2025 EO regarding IUU regulation. In fact, the United States-Mexico-Canada Agreement, which was negotiated during the first Trump Administration, has already incorporated a provision that bans all products made with forced labor. However, the technical assistance offered by ILAB and the TIP office has been so reduced that the networks, which were previously used to inform compliance with the trade agreements or support the implementation of programs to promote labor rights, have been severely weakened. Experts predict that as a result the USTR will be negotiating with less data and fewer options to improve supply chains in states with vulnerable populations.

Forced labor import bans and trade agreements are most effective when used in tandem with other tools (Casey et al. 2024). Although it hasn't yet been applied under the current administration, the Global Magnitsky Act sanctions could gain traction as a policy tool. They directly align with President Trump's priorities and were used liberally in his first term (though not for labor violations). The Act (US Department of the Treasury 2022) has been used widely against individuals and entities across 50 states, including 157 Chinese fishing vessels that were sanctioned for human rights violations (EJF 2022; US Department of the Treasury 2022).^{viii} This approach may be especially appealing to the current administration as it aligns with priorities to block foreign competitors who gain an unfair advantage through forced labor.

4.4 Conclusion

There is a growing uptake of international standards, regional, and bi-lateral agreements to improve protections for migrant fishers on the industrial and distant water fleets. Ratification of ILO C 188 has doubled over the last six years. The WCPFC labor standards for crew take up a majority of the clauses in ILO C 188 and although they do not come into force until 2028, increased discussion around these standards at a regional level may also help encourage more countries to consider ratification.

At the end of the day, however, international standards require national political will and capacity to ensure they are taken up in local and national laws and supported by the necessary regulatory infrastructure. Migrant fisher protections will thus continue to require additional or complementary regulatory structures such as the bilateral migration agreements discussed in section 4.2 above. These agreements have the potential to align regulations and the policing of recruitment agencies and vessel owners that employ migrant fishers. Bilateral cooperation – if it is done effectively – can help to create greater transparency, information flows, and mutual support among regulatory agencies. These initiatives merit additional scrutiny and coordinated monitoring and advocacy from civil society organizations.

The US Tariff Act and other laws that ban forced labor imports have had significant repercussions in the seafood industry. Now more countries are passing or agreeing to uphold forced labor import bans as a part of their trade agreements with the US. WROs incentivize employers to find ways to lift the order, offering a point of leverage for advocates to negotiate remedy.. These punitive measures have likely also caught the attention and helped increase the pressure on all seafood buyers and retailers to improve their human rights due diligence and how they monitor labor rights and recruitment processes in their supply chains.

^{viii} China's fleet, the largest globally, is notorious for serious environmental and human rights abuses. The Department of the Treasury's Office of Foreign Assets Control sanctioned two individuals who were responsible for a network of entities, including Dalian Ocean Fishing Co., Ltd. and Pingtan Marine Enterprise, Ltd. and eight other affiliates. This case marked the first time the US had sanctioned a company listed on the NASDAQ. The sanctions blocked the individuals' property or possessions in the US and prohibited any transactions by US persons that would financially benefit them.

The US government under the President Trump is continuing to prioritize policies to punish IUU fishing and forced labor particularly where it represents unfair competition for the US seafood industry. It may be challenging to overcome the deep cuts in US aid and capacity building in countries with a high number of vulnerable migrant fishers. These programs were important for improving regulatory protections and social support infrastructure. They also helped inform investigations that led to WROs. Going forward it will be important for CSOs to strategize, possibly with corporations, to show the current administration how these programs are helpful to advancing fair labor practices and thus fair competition among US trading partners.

5. Conclusion: Moving Beyond Symbolic Commitments

Across every stage of the seafood supply chain, fishers face power imbalances that are compounded by isolation at sea, language barriers, debt, and threat of retaliation. While international legal frameworks like ILO C188 and the United Nations Guiding Principles on Business and Human Rights provide important benchmarks, enforcement remains patchy and insufficient. As such, the lived experiences and voices of fishers often remain disconnected from the very systems designed to protect them.

CSOs have stepped in to bridge these accountability gaps. Through diverse contributions including union organization, legal aid, port-based infrastructure, corporate campaigns, and technology-based solutions, CSOs are enabling fisher voice and driving transparency in ways that states and corporations have not. Still, their efforts are constrained by limited funding, fragmented infrastructure, and the lack of formal integration into seafood governance systems. Fishers are seeking to organize unions, with many migrant fishers returning to support their peers, but legal restrictions, lack of connectivity while at sea, and other challenges can make it difficult to build and sustain unions in the sector. Without unions, however, fishers lack the formal structures to elevate collective voice over individual complaints, leaving them isolated in their struggles and unable to influence policy or secure fair outcomes.

Collective voice, exercised through unions, worker centers, and other membership-based organizations, is key to overcoming structural power imbalances and ensuring grievance systems are effective. Without it, individual workers must navigate complex, high-risk complaint processes alone, often facing retaliation and rarely seeing resolution. As such, fishers remain under-protected by national labor laws, and even when grievance mechanisms exist, they are often inaccessible, untrusted, or controlled by employers.

The private sector – including retailers, buyers, vessel owners, and recruitment agencies – clearly plays an important role in protecting the workers in the seafood supply chain. Although awareness of ethical recruitment has entered the mainstream discourse of the seafood industry, its translation into consistent and enforceable practice has not reached acceptable standards. Across both suppliers and retailers, public commitments to the EPP and prohibition

of forced labor are increasingly visible, but most companies stop short of disclosing the mechanisms and oversight needed to validate these commitments. The lack of recruitment agency tracking, limited worker led grievance processes, and the bias towards environmental priorities reveal structural gaps that leave migrant fishers vulnerable to exploitation. Certification bodies also have yet to fully integrate recruitment transparency and labor protections into their core standards. The recent retreat of MSC from social monitoring highlights the challenges to effective protection. If corporate policies are to be more than reputational shields, retailers and suppliers need to commit to binding requirements for human rights due diligence and reporting, transparent cost disclosures, and increased investments in worker-driven compliance programs.

To move beyond symbolic commitments, the seafood sector must embed ethical recruitment into its supply chain management and make it integral to the overall structure of business models. This requires robust corporate policies as well as independent verification, consistent data reporting, and mechanisms for ensuring fishers' rights to labor organizing. Achieving this will require collaboration between retailers and suppliers with shared investment into monitoring recruitment systems. Certifiers purporting to cover social issues that ignore the vulnerabilities created by the complex recruitment pipeline have questionable value. By expanding sustainability goals beyond an environmental focus to include robust HRDD and negotiated agreements with representative fisher unions, the seafood industry can take the next step to prevent abuses, ensuring an ethical supply chain and delivering responsible products to consumers.

Corporate policies must also be layered with global standards and policies for their enforcement. Institutions at international, regional, and national levels have developed policies that illustrate both potential solutions and several shortcomings. At the international level, global bodies like the ILO have considered the needs of workers in ocean-related industries for years. The MLC and C188 represent important standards but have yet to achieve significant progress due to limited ratification and national enforcement mechanisms. The WCPFC's uptake of labor standards is a hopeful development for the region covered by that RFMO, yet these need to align fully with international norms to be effective.

Recent years have seen an increase in bilateral labor migration agreements that focus on fishers – a departure from the primarily land-based agreements of the past. Many of these agreements specifically address the issues facing migrants, including the regulation of recruitment agencies. These agreements show promise because they outline detailed policies and require government regulation and enforcement of the recruitment process, though many of these agreements currently lack the scope and accountability necessary to create lasting change.

International trade policy remains a valuable tool for advancing government enforcement and more effective HRDD in seafood supply chains. The US, as the second largest importer of seafood after the EU, has an important role in shaping fishers' rights. Under the Biden Administration, the plight of fishers everywhere and the need to improve rights protections

helped inform national strategies on labor rights, economic development, and trade policy. The Trump Administration, however, has introduced some uncertainty – focusing primarily on strategies to protect the US seafood industry. Although many of the US programs designed to improve national fisher rights protections within seafood exporting countries have been cut, the Trump Administration will use trade policy to punish labor rights abuses that undergird unfair competition. Thus, advocates will need to push for tactical victories that align political priorities with policies, such as import bans or trade agreements.

Despite progress, government regulations – of both fishing vessels and the recruitment agencies that send and receive migrant fishers to sea – have yet to achieve meaningful outcomes in the protection of migrant fishers. While standards and regulations can look good on paper, they require robust implementation plans and enforcement mechanisms that countries have thus far failed to develop. If corporations do not increase their role in addressing the gaps left by policy, then even the most promising regulations will be undermined by unchecked competition. Both improved government regulations and corporate programs will benefit from open and earnest engagement with CSOs, particularly fisher-led CSOs such as unions. To that end, CSOs must also continue to support fisher organizing and fishers building their collective voice and thus their ability to drive public and private policies that are effective in protecting the people they are intended to serve.

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Appendices

Appendix I. Interviewees

A special thank you to the following interviewees for their time and the knowledge they shared (organized by affiliation):

- Jordan Tama – American University
- Erica Cherepko – Center for Advanced Defense Studies (C4ADS)
- Mia Hoskins – C4ADS
- Bruno Monteferri – Conservation International
- Whitley Saumweber – Center for Strategic International Studies
- Kelly Bell – FishWise
- Charli Fritzner – Greenpeace
- Sari Heidenreich – Greenpeace
- Anasuya Syam – Human Trafficking Legal Center (HTLC)
- Martina Vandenberg – HTLC
- Noor Hamadeh – International Corporate Accountability Roundtable
- Chris Williams – International Transport Workers’ Federation
- Charles Boyle – Nautilus International
- Nicole Condon – Oddisea
- Juwarih – Indonesian Migrant Workers Union (SBMI)
- Adrian Basar – SBMI
- Feliana Fauziyyah – SBMI
- Ade Herlina – SBMI
- Novia Kirana – SBMI
- Rizky Oktaviana – SBMI

Appendix II. Comparison MLC, C 188, and CMM 2024-04

Provisions	MLC 2006	ILO C188	CMM 2024-04
1. Minimum Age requirements	"1) No person below the minimum age shall be employed or engaged or work on a ship. 2) The minimum age at the time of the initial entry into force of this Convention is 16 years." Regulation 1.1	"The minimum age for work on board a fishing vessel shall be 16 years. However, the competent authority may authorize a minimum age of 15 for persons who are no longer subject to compulsory schooling as provided by national legislation, and who are engaged in vocational training in fishing." Article 9.1	N/A N/A
2. Medical Certificate	"Seafarers shall not work on a ship unless they are certified as medically fit to perform their duties." Regulation 1.2	"No fishers shall work on board a fishing vessel without a valid medical certificate attesting to fitness to perform their duties." Article 10.1	N/A N/A
3. Training and qualifications	"Seafarers shall not work on a ship unless they are trained or certified as competent or otherwise qualified to perform their duties." Regulation 1.3	"The competent authority shall: (b) require that fishing vessel owners, skippers, fishers and other relevant persons be provided with sufficient and suitable guidance, training material, or other appropriate information on how to evaluate and manage risks to safety and health on board fishing vessels." 32.2.b	CCMs ensure owners and/or operators of fishing vessels "Provide safety training and/or instruction for all the crew members working on board the vessel, with consideration given to relevant international guidelines and standards for training of crew members." 8.b
4. Recruitment and Placement	"All seafarers shall have access to an efficient, adequate and accountable system for finding employment on board ship without charge to the seafarer." Regulation 1.4	"Each Member shall, by means of laws, regulations or other measures: (a) prohibit recruitment and placement services from using means, mechanisms or lists intended to prevent or deter fishers from engaging for work; (b) require that no fees or other charges for recruitment or placement of fishers be borne directly or indirectly, in whole or in part, by the fisher; and (c) determine the conditions under which any licence, certificate or similar authorization of a private recruitment or placement service may be suspended or withdrawn in case of violation of relevant laws or regulations; and specify the conditions under which private recruitment and placement services can operate." Article 22.3.a-22.3.c	N/A N/A

Provisions	MLC 2006	ILO C188	CMM 2024-04
5. Employment Agreement	"1) The terms and conditions for employment of a seafarer shall be set out or referred to in a clear written legally enforceable agreement and shall be consistent with the standards set out in the Code. 2) Seafarers' employment agreements shall be agreed to by the seafarer under conditions which ensure that the seafarer has an opportunity to review and seek advice on the terms and conditions in the agreement and freely accepts them before signing. 3) To the extent compatible with the Member's national law and practice, seafarers' employment agreements shall be understood to incorporate any applicable collective bargaining agreements." Regulation 2.1.1-Regulation 2.1.3	"Each Member shall adopt laws, regulations or other measures: a) requiring that fishers working on vessels flying its flag have the protection of a fisher's work agreement that is comprehensible to them and is consistent with the provisions of this Convention..." Article 16.a	"Provide terms of employment, that are set out in a written contract or agreement, in a form and language that facilitates the crew member's understanding of the terms, is agreed by the crew member prior to departure on the fishing trip, and signed by both the crew member and the owner and/or operator (or, where crew members are not employed or engaged by the fishing vessel owner and/or operator, the fishing vessel owner and/or operator shall have evidence of contractual or similar arrangements). The written contract or agreement shall be made available to the crew member and, upon request, authorised officers, in accordance with national law and practice. A CCM may allow the owner and/or operator to use the particulars in Attachment 1 as a guideline for crew contracts or agreements." 7.c
6. Wages	"All seafarers shall be paid for their work regularly and in full in accordance with their employment agreements." Regulation 2.2	"Each Member, after consultation, shall adopt laws, regulations or other measures providing that fishers who are paid a wage are ensured a monthly or other regular payment." Article 23.	"Provide crew members, in accordance with the flag CCM's standards or regulations, with decent and regular remuneration (for example monthly or quarterly) that is accessible by crew as well as appropriate insurance for the crew;." 7.e

Provisions	MLC 2006	ILO C188	CMM 2024-04
7. Hours of work and rest	"Each Member shall establish maximum hours of work or minimum hours of rest over given periods that are consistent with the provisions in the Code." Regulation 2.3.2	"Each Member shall adopt laws, regulations or other measures requiring that owners of fishing vessels flying its flag ensure that: (b) fishers are given regular periods of rest of sufficient length to ensure safety and health." AND "In addition to the requirements set out in Article 13, the competent authority shall: (b) for fishing vessels regardless of size remaining at sea for more than three days, after consultation and for the purpose of limiting fatigue, establish the minimum hours of rest to be provided to fishers. Minimum hours of rest shall not be less than: (i) ten hours in any 24-hour period; and (ii) 77 hours in any seven-day period." Article 13.b AND Article 14.1.b	"Provide crew members decent working and living conditions on board fishing vessels, including access to clean or potable freshwater and food, occupational safety and health protection, medical care, rest periods and sleeping quarters, and conditions that facilitate minimum standards of health and hygiene;." 7.d
8. Right to Leave with pay	"Each Member shall require that seafarers employed on ships that fly its flag are given paid annual leave under appropriate conditions, in accordance with the provisions in the Code." Regulation 2.4.1	N/A N/A	N/A N/A
9. Holiday Leave with pay	"The following should not be counted as part of annual leave with pay: (a) public and customary holidays recognized as such in the flag State..." Guideline B2.4.a	N/A N/A	N/A N/A
10. Right to repatriation	"Seafarers have a right to be repatriated at no cost to themselves in the circumstances and under the conditions specified in the Code." Regulation 2.5	"Members shall ensure that fishers on a fishing vessel that flies their flag and that enters a foreign port are entitled to repatriation in the event that the fisher's work agreement has expired or has been terminated for justified reasons by the fisher or by the fishing vessel owner, or the fisher is no longer able to carry out the duties required under the work agreement or cannot be expected to carry them out in the specific circumstances. This also applies to fishers from that vessel who are transferred for the same reasons from the vessel to the foreign port." Article 21.1-21.3	"Cover costs of repatriation where the early termination of a contract is sought by the owner and/or operator, except where the crew member has been found, in accordance with a CCM's regulations, to be in breach of contract." 7.g

Provisions	MLC 2006	ILO C188	CMM 2024-04
11. Manning levels	"Each Member shall require that all ships that fly its flag have a sufficient number of seafarers employed on board to ensure that ships are operated safely, efficiently and with due Regulationard to security under all conditions, taking into account concerns about seafarer fatigue and the particular nature and conditions of the voyage." Regulation 2.7	"Each Member shall adopt laws, regulations or other measures requiring that owners of fishing vessels flying its flag ensure that: (a) their vessels are sufficiently and safely manned for the safe navigation and operation of the vessel and under the control of a competent skipper..." AND "In addition to the requirements set out in Article 13, the competent authority shall: (a) for vessels of 24 metres in length and over, establish a minimum level of manning for the safe navigation of the vessel, specifying the number and the qualifications of the fishers required; (b) for fishing vessels regardless of size remaining at sea for more than three days, after consultation and for the purpose of limiting fatigue, establish the minimum hours of rest to be provided to fishers. Minimum hours of rest shall not be less than: (i) ten hours in any 24-hour period; and (ii) 77 hours in any seven-day period." Article13.a AND 14.1.a-14.1.b	N/A N/A
12. Accommodation	"Each Member shall ensure that ships that fly its flag provide and maintain decent accommodations and recreational facilities for seafarers working or living on board, or both, consistent with promoting the seafarers' health and well-being." Regulation 3.1	"Each Member shall adopt laws, regulations or other measures requiring that accommodation on board fishing vessels that fly its flag shall be of sufficient size and quality and appropriately equipped for the service of the vessel and the length of time fishers live on board." Article 26.	"Provide crew members decent working and living conditions on board fishing vessels, including access to clean or potable freshwater and food, occupational safety and health protection, medical care, rest periods and sleeping quarters, and conditions that facilitate minimum standards of health and hygiene;." 7.d
13. Food and catering	"Each Member shall ensure that ships that fly its flag carry on board and serve food and drinking water of appropriate quality, nutritional value and quantity that Maritime Labour Convention, 2006 adequately covers the requirements of the ship and takes into account the differing cultural and religious backgrounds." Regulation 3.2	"Each Member shall adopt laws, regulations or other measures requiring that: (a) the food carried and served on board be of a sufficient nutritional value, quality and quantity; (b) potable water be of sufficient quality and quantity; and (c) the food and water shall be provided by the fishing vessel owner at no cost to the fisher. However, in accordance with national laws and regulations, the cost can be recovered as an operational cost if the collective agreement governing a share system or a fisher's work agreement so provides." Artivlr 21.a-27.c	"Provide crew members decent working and living conditions on board fishing vessels, including access to clean or potable freshwater and food, occupational safety and health protection, medical care, rest periods and sleeping quarters, and conditions that facilitate minimum standards of health and hygiene;." 7.d

Provisions	MLC 2006	ILO C188	CMM 2024-04
14. Wifi Access	"Shipowners should, so far as is reasonably practicable, provide seafarers on board their ships with internet access, with charges, if any, being reasonable in amount." Guideline B.3.11 (8)	N/A N/A	N/A N/A
15. Right to Medical Care on Board	"Each Member shall ensure that all seafarers on ships that fly its flag are covered by adequate measures for the protection of their health and that they have access to prompt and adequate medical care whilst working on board." Regulation 4.1	"Each Member shall adopt laws, regulations or other measures requiring that: (a) fishing vessels carry appropriate medical equipment and medical supplies for the service of the vessel, taking into account the number of fishers on board, the area of operation and the length of the voyage; (b) fishing vessels have at least one fisher on board who is qualified or trained in first aid and other forms of medical care and who has the necessary knowledge to use the medical equipment and supplies for the vessel concerned, taking into account the number of fishers on board, the area of operation and the length of the voyage; (c) medical equipment and supplies carried on board be accompanied by instructions or other information in a language and format understood by the fisher or fishers referred to in subparagraph (b)...." Article 29.a-29.c	"Provide crew members a safe working environment where the welfare, occupational safety and health of crews is effectively protected." 7.a

Provisions	MLC 2006	ILO C188	CMM 2024-04
16. Shipowner's liability	"Each Member shall ensure that measures, in accordance with the Code, are in place on ships that fly its flag to provide seafarers employed on the ships with a right to material assistance and support from the shipowner with respect to the financial consequences of sickness, injury or death occurring while they are serving under a seafarers' employment agreement or arising from their employment under such agreement." Regulation 4.2	"In the absence of national provisions for fishers, each Member shall adopt laws, regulations or other measures to ensure that fishing vessel owners are responsible for the provision to fishers on vessels flying its flag, of health protection and medical care while employed or engaged or working on a vessel at sea or in a foreign port. Such laws, regulations or other measures shall ensure that fishing vessel owners are responsible for defraying the expenses of medical care, including related material assistance and support, during medical treatment in a foreign country, until the fisher has been repatriated. " Article 39.1	N/A N/A
17. Health and Safety and Accident Prevention on Board	"Each Member shall ensure that seafarers on ships that fly its flag are provided with occupational health protection and live, work and train on board ship in a safe and hygienic environment." Regulation 4.3	"Each Member shall adopt laws, regulations or other measures concerning: (a) the prevention of occupational accidents, occupational diseases and work-related risks on board fishing vessels, including risk evaluation and management, training and on-board instruction of fishers;..." Article 31.a	N/A N/A
18. Access to shore-based welfare facilities	"Each Member shall ensure that shore-based welfare facilities, where they exist, are easily accessible. The Member shall also promote the development of welfare facilities, such as those listed in the Code, in designated ports to provide seafarers on ships that are in its ports with access to adequate welfare facilities and services." Regulation 4.4	"Each Member shall adopt laws, regulations or other measures requiring that: (e) fishers have the right to medical treatment ashore and the right to be taken ashore in a timely manner for treatment in the event of serious injury or illness." Article 29.e	N/A N/A
19. Social Security	"Each Member shall ensure that all seafarers and, to the extent provided for in its national law, their dependents have access to social security protection in accordance with the Code without prejudice however to any more favorable conditions referred to in paragraph 8 of article 19 of the Constitution." Regulation 4.5	"Each Member shall ensure that fishers ordinarily resident in its territory, and their dependants to the extent provided in national law, are entitled to benefit from social security protection under conditions no less favourable than those applicable to other workers, including employed and self-employed persons, ordinarily resident in its territory." Article 34.	N/A N/A