



LDAC ADVICE

Addressing risks of forced labour and serious human rights abuses in certain fleets operating in the IOTC Convention Area

Ref: R-02-Ej.20 (2026-2027)/WG1-WG5

Date of adoption by Executive Committee: 2nd July 2026

1. Introduction and context

The Long Distance Advisory Council (LDAC) recalls that sustainable fisheries management under the Common Fisheries Policy (CFP) encompasses environmental, economic, and social sustainability. Respect for fundamental labour and human rights at sea should form an integral part of this framework.

The LDAC also recalls that the European Commission's Decent Work Communication underscores the EU's commitment to tackling labour abuses globally and stresses the importance of ensuring that supply chains are free from exploitation, forced labour, and other human rights violations, reinforcing responsible business conduct and sustainable trade.¹

The LDAC has followed the discussion around labour standards during the 30th session of the Indian Ocean Tuna Commission (IOTC). The LDAC welcomes these discussions and their inclusion into the established working group on socio-economics. The LDAC also welcomes the European Union's call on IOTC Members to ratify ILO Convention No. 188. Progress in ratifying this convention and operationalising its control is particularly pressing, as the LDAC notes with concern findings indicating that existing RFMO provisions on labour and social standards fall short of those required by the convention.²

In parallel, the LDAC takes note of credible reports concerning serious labour and human rights abuses affecting crew members working on certain fleets operating in the Convention Area of the IOTC. The reported practices include debt-linked recruitment arrangements, retention of identity documents, excessive working hours, wage withholding, isolation at sea, and inadequate living and medical conditions.

¹ European Commission, Commission sets out strategy to promote decent work worldwide and prepares instrument for ban on forced labour products, Press Release IP/22/1187, Brussels, 23 February 2022, available at: https://ec.europa.eu/commission/presscorner/detail/en/ip_22_1187

² Cacaud P., IOTC, Discussion paper on labour standards on fishing vessels in IOTC fisheries, IOTC-2026-S30-14, 30 April 2026, available at: <https://iotc.org/documents/Com/30/14E>

2. Findings³

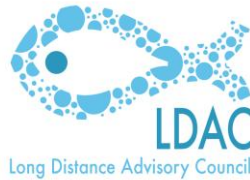
Between January and December 2025, the Environmental Justice Foundation (EJF) – a member of the LDAC, conducted 63 interviews with Indonesian crew members who worked on 36 non-Indonesian vessels active in the IOTC Convention Area. These vessels, all longliners, flew the flags of African and Asian nations. The crew members interviewed reported working on the vessels between January 2022 and September 2025.

Alleged Human Rights (HR)/Labour Abuses		
Total crew members/fishers interviewed	63	% (n=63)
Debt bondage	63	100,0%
Document retention	62	98,4%
Excessive overtime (≥14 hours of work)	60	95,2%
Isolation/deprived of communication means	52	82,5%
(Potentially) Abusive living and working conditions	47	74,6%
Deception	37	58,7%
Unpaid salaries/withholding of wages	19	30,2%
Threats/intimidations	19	30,2%
Case of death on board	11	17,5%
Physical or sexual abuse	9	14,3%

During the same period (January – December 2025), EJF also conducted 46 interviews with Indonesian crew members who worked on 14 Indonesian vessels active in the IOTC Convention Area. The summary of the alleged human rights/labour abuse instances recorded is as follows:

Alleged Human Rights (HR)/Labour Abuses		
Total crew interviewed	46	%(n=46)
Document retention	46	100%
Excessive overtime/Working over 14 hours	45	98%
Experience and witnessing physical and sexual abuse	23	50%
Abusive living and working condition	16	35%
Working under extreme weathers/dangerous conditions or while sick	16	35%
Serious illness/injury on board	8	17%
Intimidation and threat	8	17%
Deception	1	2%

³ This content contains allegations of potential illegal activities. These statements are based on preliminary information, observations, or research and have not been independently verified by competent authorities. They are intended for informational purposes and to highlight areas that may warrant further investigation. Confirmation, legal assessment, and enforcement decisions are the responsibility of the relevant regulatory, law enforcement, or judicial bodies.



3. General position of the LDAC

The LDAC:

- Reaffirms that the sustainability objectives of the CFP require compliance with applicable international labour standards in fisheries;
- Supports the effective implementation of ILO Convention No. 188 and other relevant conventions;
- Considers that labour abuses undermine fair competition between operators;
- Emphasises that action should be evidence-based, proportionate and non-discriminatory;
- Supports coordinated EU action combining fisheries governance, trade instruments, and due diligence frameworks.

Adopting and effectively implementing a zero-tolerance policy toward violence and human rights abuses is critical. This policy must be communicated clearly and forcefully through the supply chain.

4. Recommendations at RFMO Level (IOTC)

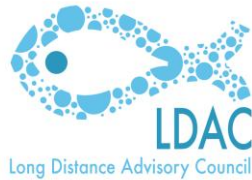
In general, the LDAC calls on the European Union to take a proactive role in the IOTC working group on socio-economics and strive to secure strengthened safeguards against labour abuses and, more broadly, robust measures for the safety, well-being, and security of crew and human observers. In that context, the EU should continue urging IOTC members to ratify ILO Convention No. 188 and other relevant existing standards to ensure decent living and working conditions on board all IOTC-authorized fleets.

4.1 Control-related measures

The LDAC calls on the EU and all IOTC members to make full use of the IOTC working group on socio-economics to explore how control-related conservation and management measures can be strengthened to better detect, document, and address cases of substandard working and living conditions aboard fishing vessels, labour rights violations, and indicators of forced labour.

4.2 Time at sea

The LDAC is in favour of adopting limits on the maximum number of days at sea without returning to port for fishing vessels. All fishing vessels should be restricted from operating at sea for more than 4 consecutive months; only in exceptional circumstances (pandemics, port closures, etc.) should periods at sea be extended to 6 consecutive months.



4.3 At-sea trans-shipment

Literature and concrete cases have now well established that the practice of at-sea trans-shipment can facilitate forced labour and human trafficking.⁴ The LDAC notes that the number of reported at-sea trans-shipments in IOTC has doubled in the past ten years (2014-2024). In 2024, more than 80% of these operations had been carried out by just two fleets: China and Taiwan.⁵

Consistent with previous LDAC advice on regional fisheries management organisations, including ahead of IOTC meetings⁶, the LDAC continues to support the total elimination of trans-shipments at sea and welcomes all proposals that will go along this line, including any proposal that improves trans-shipment oversight, in the interim.

4.4 Monitoring systems

The LDAC continues to urge the introduction and mandatory use of a regional VMS applied to all fleets operating in the area to strengthen monitoring, control, and surveillance of tuna and tuna-like fisheries in the Indian Ocean.

In addition, the LDAC supports the progressive deployment of electronic monitoring systems where proportionate and legally justified. Some fleets operating in distant waters continue to evade effective monitoring and control, particularly in areas where oversight remains limited. Consistent with previous LDAC advice on regional fisheries management organisations, including ahead of IOTC meetings⁷, the progressive deployment of electronic monitoring (EM), including onboard cameras, offers a practical and scalable solution to strengthen oversight⁸.

⁴ Food and Agriculture Organization of the United Nations (FAO), Transshipment: a closer look – An in-depth study in support of the development of international guidelines (Rome: FAO, 2020), available at: <https://openknowledge.fao.org/server/api/core/bitstreams/a2c70851-7ca5-4a98-8ea0-7cf4d3abc616/content>.

⁵ IOTC, Report on Transshipment (Resolution 24/05), prepared by the IOTC Secretariat, 6 March 2025, available at: https://iotc.org/sites/default/files/documents/2025/04/IOTC-2025-CoC22-04a_Rev1_E_-_Report_on_Transshipments.pdf.

⁶ Long Distance Advisory Council (LDAC), Advice to the EU on IOTC matters 2025 (Ref. LDAC-ADVICE-IOTC-AM-2025), 2025, available at: https://ldac.eu/images/EN_LDAC_ADVICE_IOTC_AM_2025.pdf.

⁷ Long Distance Advisory Council (LDAC), Advice to the EU on IOTC matters 2025 (Ref. LDAC-ADVICE-IOTC-AM-2025), 2025, available at: https://ldac.eu/images/EN_LDAC_ADVICE_IOTC_AM_2025.pdf.

⁸ Environmental Justice Foundation (EJF), Eyes on the Water: Tackling illegal fishing and human rights abuses through the use of onboard CCTV cameras, January 2026, available at: <https://ejfoundation.org/resources/downloads/CCTV-Report-EJF.pdf>.



5. Recommendations at EU Level

5.1 Coherent use of EU legal instruments

- Implement the EU Forced Labour Regulation (FLR) in a proportionate and risk-based manner. As part of the risk-based approach, take into account risk factors specific to global fisheries supply chains;
- Identify relevant countries or, in the cases described in this advice where abuses have occurred on board vessels, flag states and products in the upcoming risk database, followed by the application of stricter import controls where appropriate;
- Ensure coordination across different DGs and services, in particular by strengthening synergies between the IUU dialogues and work under the FLR and other related initiatives;
- Where the EU has trade arrangements with these nations, use the full range of instruments available under those frameworks to ensure the situation is effectively addressed;
- Use the EU's diplomatic network to engage with relevant countries and support efforts to address the issue; and
- Refrain from granting duty-free access to the EU market for tuna products originating from countries identified as presenting high risks of IUU fishing and forced labour, until credible guarantees of compliance with EU standards and effective enforcement are in place.

5.2 Due diligence and supply chain transparency

In light of the Corporate Sustainability Due Diligence Directive (CSDDD), the LDAC encourages development of fisheries-specific guidance and proportionate traceability measures.

The LDAC also wishes to draw attention to the recommendations it formulated in its letter to the European Commission, "The importance of the social dimension of the CFP and promoting sustainable and responsible supply chains"⁹. This letter was transmitted by DG MARE to relevant Commission services but is still pending a detailed response¹⁰.

The LDAC recommends that relevant EU services review its advice "Protocol for the Prevention and Eradication of Harassment in Fishing Vessels"¹¹ and promote recommended solutions beyond the EU.

⁹ Long Distance Advisory Council (LDAC), Letter on "The importance of the social dimension of the CFP and promoting sustainable and responsible supply chains," 12 November 2025, available at: https://ldac.eu/images/LDAC_Letter_SocialDim_and_Annex_12Nov2025.pdf

¹⁰ European Commission, Reply to the LDAC letter on "The importance of the social dimension of the CFP and promoting sustainable and responsible supply chains" (Ref: R-09-Ej.19 (2025–2026)/WG5), 19 January 2026, available at: https://ldac.eu/images/EC_Reply_to_LDAC_letter_on_social_dimension_19-01-2026.pdf

¹¹ Long Distance Advisory Council (LDAC), Advice: Protocol for the Prevention and Eradication of Harassment in Fishing Vessels, 12 March 2026, available at: https://ldac.eu/images/EN_LDAC_Advice_anti-harassment_12-03-2026.pdf



6. Conclusion

The LDAC reiterates that sustainable fisheries require effective conservation measures, fair competition, and respect for internationally recognised labour standards. It calls upon the European Union to pursue a coherent and legally robust approach combining RFMO action, EU regulatory instruments, transparency measures, and constructive international cooperation.

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