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Voluntary HSBI Regional Guides – Crew Labour Standards

WCPFC-TCC22-2026-25B

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Voluntary HSBI Regional Guides
TOOLS FOR HIGH SEAS BOARDING AND INSPECTIONS

Crew Labour Standards Guide

Document History

Version	Effective Date	Description of Revision	Prepared by	Reviewed by

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PURPOSE STATEMENT

1. This document provides guidance to authorised inspectors conducting WCPFC High Seas Boarding and Inspections (HSBI¹) for:
 - monitoring and assessing owners and/or operators of fishing vessels compliance with the crew labour standards measure
 - maintaining records of issues related to implementation of crew labour standards measure
 - identification of other crew welfare issues.

¹ HSBI, refers to boarding, inspection, and related activities on the high seas within the Convention Area conducted pursuant to CMM 2006-08 Western and Central Pacific Fisheries Commission Boarding and Inspection Procedures or any successor CMM.

2. This Guide aims to promote harmonisation, supporting a consistent process, in the implementation of a strategic approach to effectively detect compliance issues with crew labour standards on vessels which are boarded and inspected on the high seas.
3. The application of this Guide will be voluntary and apply to authorised HSBI activities within the WCPFC Convention Area.
4. This guide should be modified in response to future amendments to crew labour standards. It is expected that this guide will continue to evolve as the field develops.

~~Assessing CREW LABOUR STANDARDS ASSESSMENTS during a WCPFC HSBI~~

5. The aim of HSBI ~~s-isactivities~~ to ensure a vessel is compliant with the WCPFC Convention and all applicable WCPFC Conservation and Management Measure (CMM) obligations.

~~The HSBI report should record crew labour standards information to enable verification of compliance with the crew labour standards measures. Suggested questions and guidance for inspecting officers in **annex 1**.~~

6. ~~To assist in recognising and identifying possible breaches of crew labour standards~~
~~Authorised Inspectors should use Attachment 2 Definitions of forced or compulsory labour:~~

- i. ~~Abuse of vulnerability~~
- ii. ~~Deception~~
- iii. ~~Restriction of movement~~
- iv. ~~Isolation~~
- v. ~~Physical and sexual violence~~
- vi. ~~Intimidation and threats~~
- vii. ~~Retention of identity documents~~
- viii. ~~Withholding of wages~~
- ix. ~~Debt bondage~~
- x. ~~Abusive working and living conditions~~
- xi. ~~Excessive overtime.~~

7. ~~To assist in recognising and identifying possible breaches of crew labour standards~~
~~Authorised Inspectors should use Attachment 2 Definitions of mistreatment:~~
 - i. ~~the failure to provide crew members a safe working environment where the welfare, occupational safety and health of crews is effectively protected. This includes the failure to provide crew members with decent working and living conditions on board fishing vessels.~~

8. To complete a crew labour standards assessment, Authorised inspectors can:

- i. review vessel documentation
- ii. conduct a physical/visual inspection of a vessel
- +iii. conduct interviews with crew members.

9. Evidence related to assessing compliance with the crew labour standards measures (CMM2024-04) should be documented by the inspection authorities. Evidence could include photos and videos of relevant documents and injuries, as well as written reports or statements from crew.

10. Photos and videos that crew themselves have taken of the conditions on board can also be important evidence.

11. The HSBI report should record crew labour standards information as set out in the checklist at ~~(refer~~ Annex 1. Example HSBI report template / inspection checklist – crew labour standards).

INSPECTION OF DOCUMENTS

12. During a boarding, Authorised Inspectors should review and document available records and documents:

- i. Vessel Documentation
 - vessel ownership records;
 - crew list including passport details;
 - age verification/Minimum Age.

- ii. Labour Documentation
 - employment agreements;
 - wage records;
 - repatriation arrangements;
 - crew identity records;
 - hours of work/rest recovery.

- iii. Safety Documentation
 - injury logs;
 - illness records;
 - accident reports;
 - emergency procedures.

- iv. Incident Documentation
 - reports of deaths;

- reports of missing crew;
- reports of serious injuries;
- reports of allegations of forced labour.

INSPECTION OF VESSEL CONDITIONS

13. During boarding, Authorised Inspectors should document:

- i. Occupational health and Safety
 - PPE availability and/or use of
 - emergency equipment and procedures
- ii. Accommodation and provisions
 - sleeping arrangements
 - sanitation
 - potable water
 - meal frequency
 - quality of provisions
- iii. Medical Care
 - medical evacuation procedures
 - medical kits / supplies
 - access to medicines and medical supplies

CREW INTERVIEW PRINCIPLES²

14. Crew interviews conducted by authorised inspectors must be:

- i. confidential;
- ii. voluntary;
- iii. conducted without vessel management present;
- iv. conducted using interpreters where necessary.

15. Crew interviews conducted by authorised inspectors should:

- i. never be undertaken in the presence or within the earshot of skippers, crew supervisors or deck boss (bosun).
- ii. be a minimum of 15 minutes. Rather, a shortened set of questions should be used, and additional questions reserved for follow-up investigations when warning signs of forced labour are found.
- iii. be conducted in the crew members language.

² ILO Towards freedom at sea: Handbook for the detection of forced labour in commercial fishing

iv. be collected via anonymous means, such as a mobile device, if verbal interviews are unable to be conducted.

v. be conducted with no less than 25% of the crew on board.

16. Crew interviews can take place in small groups (3 to 6 fishers) or individually depending on the circumstances

17. Inspectors should be clear with fishers about how they would like to use (or in some cases, are required to use) the information collected.

18. Crew interviews at sea can create a vulnerability to the crew member so at-sea crew interviews may not always be possible.

19. Crews are rarely engaged at length on these issues and may have questions for Authorised inspectors about their situation, their options, the terms of their contract or legal standards. Authorised inspectors should let the crew members know that the interview will be followed up.

20. Where possible, authorised Inspectors should name unions, labour rights groups, charities and even consulates that can help crew members right away and in the future.

21. Authorised inspectors should use the Annex 2 for Crew Interview record / questionnaire template.

COMMUNICATION FOLLOWING INSPECTION

22. In the event that any issues related to forced or compulsory labour and other mistreatment are detected as set out in para 12 of CMM2024-04, the inspecting State should notify the flag State as soon as practicable and consider notifying the next port state (if known).

Annex 1. Example HSBI report template / inspection checklist – Crew Labour Standards

Application of Crew Labour Standards	
This measure applies to fishing vessels operating exclusively on the high seas in the Convention Area, vessels fishing on the high seas and in coastal State EEZs, and vessels fishing in the EEZs of two or more coastal States. <i>This measure does not apply to vessels which are solely authorised to operate within their national jurisdiction.</i>	Is the vessel authorised to fish in the Convention Area and is the vessel fishing: • Exclusively on the High Seas ☐ • On the High Seas and in Coastal state EEZs ☐ • On the High Seas and in the EEZs of two or more coastal States ☐ Inspector Comment:
Does WCPFC CMM 2024-04 (Crew Labour Standards) apply to this vessel? Y/N [Yes, if operating in any of the areas above]	
Paragraph 3. Crew Provider Information	
<i>If applicable</i>	
What is the name of the Crew Provider?	
What is the location of the Crew Provider?	

Commented [A1]: Is there any vessel that this wouldn't apply to that fisheries officers would be inspecting? If not, then suggest removing question

Commented [A2]: Query applicability to HSBI/Vessel owner operators. Para 3 reads as a CCM obligations to provide the Crew Provider information to the WCPFC Sec.

What is the contact details of the Crew Provider?	
Inspection Requirements	
Was the working environment considered safe for crew during the inspection (ref 7. a.)?	
Inspector Comments:	
Was any forced or compulsory labour, and other mistreatment observed during the inspection (ref 7. b.)? Y/N	
Inspector Comments:	
Was a written contract available on request (ref 7.c)? Y/N	
Inspector Comments:	
What language(s) is the contract written?	
Have the written contracts been signed by both the crew member and owner/operator?	
<u>Is there evidence of a contractual or similar arrangement if the crew member is not employed by the owner/operator?</u>	
<u>Were crew members provided with decent working and living conditions on board fishing vessel? (ref 7.d.)</u>	
Inspector Comments:	
Was there access to clean potable water and food onboard the vessel for crew (ref 7.d.)?	
<u>Was OHS protection provided, e.g. PPE?</u>	
<u>Were there medical supplies on board (accessible to crew and within date) and any evidence of medical care?</u>	
<u>Were rest periods documented?</u>	
<u>Conditions that facilitate minimum standards of health and hygiene?</u>	
Do crew members have decent and regular remuneration that is accessible by crew and insurance (ref 7. e)? Y/N	
Inspector Comments:	
<u>E.g. monthly or quarterly payments.</u>	

Commented [A3]: Note CMM definitions and consider if additional guidance/training is needed for inspection officers on indicators.

Commented [A4]: Would Employment Agreements be physically (paper or digital) on board upon request ?

Commented [A5]: Consider what additional guidance is needed to verify this? Do inspecting officers just ask the question or ask for documentation (e.g. payslips)?

Do crew members have regular opportunity to disembark the vessel (ref 7.f.) ? Y/N (How often do you disembark the vessel)
Inspector Comments: (How often do you disembark the vessel)
Do crew members have unfettered access to their identity documents (ref 7.f.)? Y/N
Inspector Comments:
Do crew members have the ability to terminate the contract of employment and repatriate (ref 7.f.)? Y/N
Inspector Comments:
Do crew members have unmonitored access to communications (ref 7. f.)? Y/N
Inspector Comments:
Is there a record of the contact details of each crew member's next of kin or designated contact person on board (ref 8a)? Y/N
Inspector comments
Is there any evidence that safety training and/or instruction has been provided for all working crews (ref 8b)? Y/N
Inspector comments
*Consider additional questions around: - Crew member death (ref 9) - Crew member serious illness or injury (ref 10) - Crew member missing or fallen overboard (ref11)

Commented [A6]: If certain information cannot be gained via a document or visual search, the questionnaire for crew members may be more appropriate. Consider if these responses are recorded in the HSB1 report (or the final report to flag CCM).

Commented [A7]: It may be worth clarifying that questions like these need to be addressed to the crew, not the master/mate. Perhaps break the form up into three sections: Bridge Questions, Observations and Crew Questions

[Annex 2. Crew interview record / questionnaire template](#)