



COMMISSION
Twenty-Second Regular Session
1-5 December 2025
Manila, Philippines (Hybrid)

Position Statements and Recommendations to WCPFC22

WCPFC22-2025-OP20

27 November 2025

Submitted by The Union of Indonesian Migrant Workers (SBMI)



**DEWAN PIMPINAN NASIONAL
SERIKAT BURUH MIGRAN INDONESIA**

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**The Union of Indonesian Migrant Workers (SBMI)
Position Statements and Recommendations to WCPFC22**

Introduction and Recognition

On the occasion of the 22nd Regular Session of Western and Central Pacific Fisheries Commission (WCPFC22), the Union of Indonesian Migrant Workers (SBMI) respectfully presents its key messages, positions and recommendations as outlined below.

1. We express our gratitude to the Government of the Philippines and the WCPFC Secretariat for their gracious hospitality, preparation, and facilitation of the 22nd Regular Session of the WCPFC ([WCPFC22](#)) in Manila, Philippines.
2. We extend our sincere appreciation to all Members and Observers of WCPFC for their collective dedication and solidarity, which led to the adoption of the Conservation and Management Measure on Crew Labour Standards ([CMM 2024-04](#)) during WCPFC21 in Suva, Fiji.
3. We commend the Government of New Zealand for submitting the [Draft Audit Points for Crew Labour Standards: CMM 2024-04](#) during the 21st Regular Session of the Technical and Compliance Committee (TCC21) held in Pohnpei, Federated States of Micronesia.
4. We also take pride in the joint solidarity and endorsements expressed by our Allies, including other unions, civil society organisations (CSOs), and multi-stakeholder partners, as listed in [Annex 1](#), in support of SBMI's Position Statements and Recommendations to WCPFC22.

CMM on Crew Labour Standards: Accelerating and Ensuring Readiness for Implementation

5. SBMI encourages all CCMs to demonstrate their continued commitment by preparing and aligning relevant legal, administrative, and operational instruments to support the timely and effective implementation of the CMM on Crew Labour Standards.
6. SBMI respectfully suggests that the WCPFC Secretariat consider strengthening its expertise in labour standards, including the potential appointment or collaboration with labour specialists, to support the effective handling of reports related to forced labour incidents onboard fishing vessels.
7. SBMI highlights that the responsibility to report information on Crew Providers should be understood as a shared obligation among CCMs, vessel owners, and operators, in accordance with paragraphs 3 and 4 of the CMM on Crew Labour Standards. This ensures that crew providers working through international partnerships or subcontracting arrangements are accurately captured in reports, promoting full traceability and effective implementation of the measure.
8. SBMI encourages all CCMs to uphold the **Non-Punishment Principle** for victims of human trafficking and forced labour; review their visa system to ensure the application of the non-discrimination principle toward migrant fishers rights and the fulfillment of the right to remedy for victims; affirm the latest Forum Fisheries Agency's [Harmonised Minimum Terms and Conditions for Access by Fishing Vessels](#) that integrate fair labour and employment standards; and ensure the **implementation of fair recruitment practices** and compliance with minimum working and living conditions onboard fishing vessels. These actions are in line with the principles set out in the CMM on Crew Labour Standards (CMM 2024-04).
9. SBMI supports and encourages CCMs to continue constructive discussions on the development of the Draft Audit Points for the new CMM on Crew Labour Standards (CMM 2024-04), as considered under WCPFC22.

Current Overview of Reported Labour Exploitation Cases and Complaints in 2025

10. Between January and November 2025, SBMI received **7 cases from 6 vessels** involving Indonesian crew members working in the fishing vessels operating under the jurisdiction of the WCPFC, who continued to experience various forms of human rights violations. These included cases of withholding of wages, retention of identity documents, abusive working and living conditions, manipulation of insurance claims and excessive working hours.
11. Between January and June 2025, SBMI's ally, Environmental Justice Foundation (EJF), interviewed **48 Indonesian crew members** who worked on **39 distant-water fishing vessels** operating in the WCPFC Convention Area. Through investigation and semi-structured interviews with crew members, EJF has gathered allegations of human

SBMI Position to WCPFC22 [Simplified Final Version]

rights violations experienced by the crew. These alleged violations revealed 9 out of 11 ILO Forced Labour indicators.

12. SBMI and allies will proactively share with the WCPFC Secretariat and relevant CCMs a detailed list of fishing vessels operating under the jurisdiction of the WCPFC with forced labour cases reported in 2025, as compiled and/or received by SBMI and its allies.
13. SBMI is also prepared to provide, upon request, further details on the 2025 List of Labour Exploitation Cases and Complaints compiled by SBMI and its allies to relevant observers, stakeholders, and media representatives.

Advancing Fisheries Transparency and Institutional Accountability for the Protection of Fishers and Ocean Resources

14. We urge the WCPFC and each its Members to enhance its MCS (Monitoring, Control and Surveillance) accountability by integrating the Human Rights Based Approach (HRBA) and fisheries transparency principles, especially on assessing and evaluating on an annual basis including and not limited to: (a) the fishing vessels licensing and compliance, its legal beneficial ownership, its catches and bycatches record, and its authorization and/or re-authorization; (b) fisheries observer onboard and/or electronic monitoring, at port as well as at EEZ and high seas inspection programmes including the observers safety and their protection; (c) labour-related crew employment reporting systems including the working conditions, access to communication and grievance mechanisms; and (d) ensuring such all information, assessment and evaluation reports are publicly accessible, reliable, and verifiable.
15. SBMI calls upon all CCMs to ratify and implement the ILO Work in Fishing Convention (C188) as an essential step toward ensuring decent working and living conditions for all fishers and aligning national labour frameworks with international standards.
16. SBMI supports the establishment of regular, transparent reporting and review mechanisms within WCPFC processes, particularly concerning the implementation of crew labour standards, to enhance institutional accountability and protect both fishers' welfare and the sustainability of tuna and marine resources.

Endorsements

17. SBMI recognises and commends the valuable initiatives, joint statements, recommendations, collaborations, and advocacy efforts undertaken by various stakeholders to advance ethical, responsible, and sustainable fisheries management.

Our Commitment Forward

18. SBMI remains strongly committed and prepared to engage in further open, inclusive, and constructive dialogues aimed at advancing our shared efforts toward the timely and effective implementation of the CMM on Crew Labour Standards.

19. SBMI reaffirms its strong commitment to promoting meaningful social dialogue and sustained collaborative efforts to mainstream a Human Rights-Based Approach (HRBA), thereby contributing to more ethical, responsible, and sustainable fisheries management across the Western and Central Pacific Ocean (WCPO) and global oceans.

In solidarity and with respect for the dignity of all fishers, coastal and local communities, and seafood workers, united in the pursuit of ending forced labour, ensuring decent work for all at sea, and safeguarding the sustainability of marine resources.

#ProtectWorkers #ProtectOceans!

Thank you!

Hariyanto Suwarno

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Annex 1. List of Endorsements on SBMI's Position to WCPFC22

1. GPSEA
2. EJF
3. DFW
4. HRWG
5. TAHR
6. FSB-KAMIPARHO
7. SPPI
8. SAKTI
9. Jangkar Karat Indonesia
10. F-SPMI
11. KSPSI-Pembaruan
12. YMFU
13. KSPN
14. SPA
15. Migrant CARE
16. IOJI