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**The Union of Indonesian Migrant Workers (SBMI) and Accountability.Fish Statement to  
WCPFC22**

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**Submitted by**

**The Union of Indonesian Migrant Workers (SBMI) and Accountability.Fish**



**Joint Statement**  
**The Union of Indonesian Migrant Workers (SBMI) with Accountability.Fish**  
**To WCPFC22**

## **Ending At-Sea Transshipment:** **As means of Eliminating IUU Fishing and Forced Labour**

### **At-Sea Transshipment as an Enabler**

**Transshipment at sea has become a critical point of vulnerability where the risks of IUU fishing and labour abuses intersect.** While the practice is intended to facilitate logistical efficiency, its operational reality creates conditions that can be exploited on multiple fronts. The ability to offload catch without returning to port allows fishing vessels to remain at sea for prolonged periods, which not only weakens the traceability of harvested fish but also limits opportunities for labour inspections and welfare checks for crew members.

Numerous investigations across distant water fleets indicate that vessels engaged in transshipment are more frequently associated with misreporting, unverified catch transfers, forced labour, and for trafficking-in-person.<sup>1</sup> **These patterns underscore a structural link: the same lack of transparency and traceability that enables illicit fishing activity also shields abusive working conditions from scrutiny.**

By allowing transshipment under these concerned conditions, WCPFC Members not only multiplies the risk of IUU fishing but also directly conflicts with their own commitments under the Commission's CMM for labour standards, which are explicitly designed to ensure safe, fair, and monitored working conditions for crew.<sup>2</sup>

### **Limitations of the Monitoring Tools for Transshipment at Sea**

At-sea transshipment often takes place in remote regions of the high seas, far from ports and coastal authorities. These areas inherently lack enforcement presence, making it difficult for regulators to observe or respond to activities in real time. **The isolation of these operations creates opportunities for vessels to schedule transfers without oversight, exploiting gaps in enforcement capacity.**

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<sup>1</sup>

<https://eifoundation.org/reports/the-weakest-link-how-at-sea-trans-shipment-fuels-illegal-fishing-and-human-rights-abuses-in-global-fisheries>

<sup>2</sup> <https://cmm.wcpfc.int/measure/cmm-2024-04>

While remote monitoring tools such as AIS and VMS provide data on vessel location and movement, they cannot confirm whether a transfer occurred or what was exchanged. Carrier vessels can disable or manipulate these systems, and proximity alone does not indicate compliance with regulations. **As a result, even the most advanced technology cannot reliably verify the legality of transshipment events.**

**Observers are the most effective means of ensuring compliance, yet coverage is limited and has its inherent limitations.** Observers are not always deployed on fishing or carrier vessels, and even when present, their ability to monitor and report can be constrained by safety, operational, or logistical factors. In the WCPFC alone, coverage for observers is only mandated to be at 5% for CCMS' fishery operations.<sup>3</sup> Electronic monitoring and observer requirements are inconsistently mandated across RFMOs, leaving significant gaps where at-sea transshipment remains effectively unverified.

Taken together, geographic isolation, technological limitations, and gaps in human oversight create structural vulnerabilities that cannot be fully addressed by simply strengthening monitoring tools. Even enhanced tracking, observer coverage, or electronic systems will not eliminate the opportunities for unobserved and unverified transshipment. The repeated pattern shows that the belief in stronger monitoring as a complete solution is flawed. **This underscores that stronger monitoring alone is not a sufficient solution; addressing the risks of IUU fishing and labour abuses requires fundamental changes to how transshipment is regulated.**

## **The Solution**

**For these reasons, if the Commission is serious about eliminating IUU fishing and forced labour cases, the only honest and effective call is to end transshipment at sea. It may be time for WCPFC to consider a more decisive shift toward port-based transshipment, where accountability is stronger and where members can have greater assurance that the fish entering supply chains reflects legal and verifiable operations.** Such a direction would reinforce the credibility of the Commission and send a clear signal that IUU fishing and forced labour risks will not be tolerated.

A transition to port-based transshipment must be backed by strong, enforceable measures that leave no room for IUU fishing or labour abuse. Large industrial vessels over 24 meters should not remain at sea for more than three months, and smaller vessels should be limited to one month, with mandatory access to port services for at least ten days every three months.<sup>4</sup> These limits must be strictly verified and enforced.

At the same time, port state measures, observer coverage, electronic monitoring, and enforcement capacity must be significantly expanded to ensure that port transshipment is fully transparent and compliant.

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<sup>3</sup> <https://cmm.wcpfc.int/measure/CMM-2018-05>

<sup>4</sup> <https://www.fisheriesgovernance.org/>

Only with these combined actions can WCPFC ensure that transshipment at port occurs in a way that is verifiable, accountable, and consistent with both conservation and labour standards. **This approach moves beyond temporary fixes and addresses the structural vulnerabilities that make at-sea transshipment inherently risky.**

## **Conclusion**

Transshipment at sea inherently creates structural vulnerabilities that enable both IUU fishing and labour abuses, revealing that no level of monitoring alone can fully address these risks. The persistent gaps in oversight and verification show that this practice undermines WCPFC's commitments to sustainable fisheries and safe working conditions.

**A decisive shift to port-based transshipment, supported by strict enforcement, robust port state measures, and verified access for fishers, is the only credible solution to ensure accountability, traceability, and crew welfare while safeguarding the integrity of regional fisheries management.**

**Ending at-sea transshipment would send a clear signal that IUU practices and labour abuses will not be tolerated and that WCPFC is committed to effective, enforceable, and sustainable fisheries governance.**