



## **DEWAN PIMPINAN NASIONAL SERIKAT BURUH MIGRAN INDONESIA**

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Subject : **SBMI's Intervention Statement on item agenda On Establishing a Programme for Transshipment by Large Scale Fishing Vessel**

*Chair and distinguish delegates,*

*On behalf of the Union of Indonesia Migrant Workers, we stand before this Commission with a clear message and bring the voice of workers or crews to this forum. While [Proposal P submitted by the EU](#) introduces certain amendments to the current framework, these adjustments still fail to confront the fundamental problem that at-sea transshipment itself remains a high risk activity intrinsically linked to weak oversight, IUU fishing, and labour abuse.*

*Many studies demonstrate that transshipment is a gateway for IUU fishing, as well as being linked to repeated and severe cases of abuse of crews. The reality is that at-sea transshipment enables vessels to remain isolated from scrutiny while fish, fuel, supplies, and sometimes even crews are exchanged beyond the reach of effective enforcement.*

*We acknowledge that the Commission has developed monitoring measures through observer programmes, VMS requirements, reporting obligations, and as will be discussed later, discussions around mandatory AIS. However, the evidence already before this Commission demonstrates the severe limitations of these measures.*

*We must be honest about what this means. If transshipment activities continue to generate persistent reporting inconsistencies, transparency gaps, and conditions that isolate crews from protection, then the issue is no longer simply weak implementation. The problem is the at-sea transshipment itself.*

*We continue to hear calls for stronger monitoring tools. However, discussions on transshipment should not focus solely on operational efficiency and fisheries control, but must also consider the human impacts experienced by workers onboard fishing and carrier vessels. Unfortunately, no amount of paperwork, electronic reporting, or observer deployment can fully eliminate the structural opacity created when fish and people are transferred in the middle of the ocean, far from independent scrutiny.*

*As a workers' organization, we believe it is important that labour protection and the experiences of fishers are included in these discussions. If this Commission is serious about eliminating IUU fishing and preventing abuse at sea, then it must stop treating at-sea transshipment as a normal operational practice that merely requires better monitoring.*

*We need to protect workers to protect the oceans.*