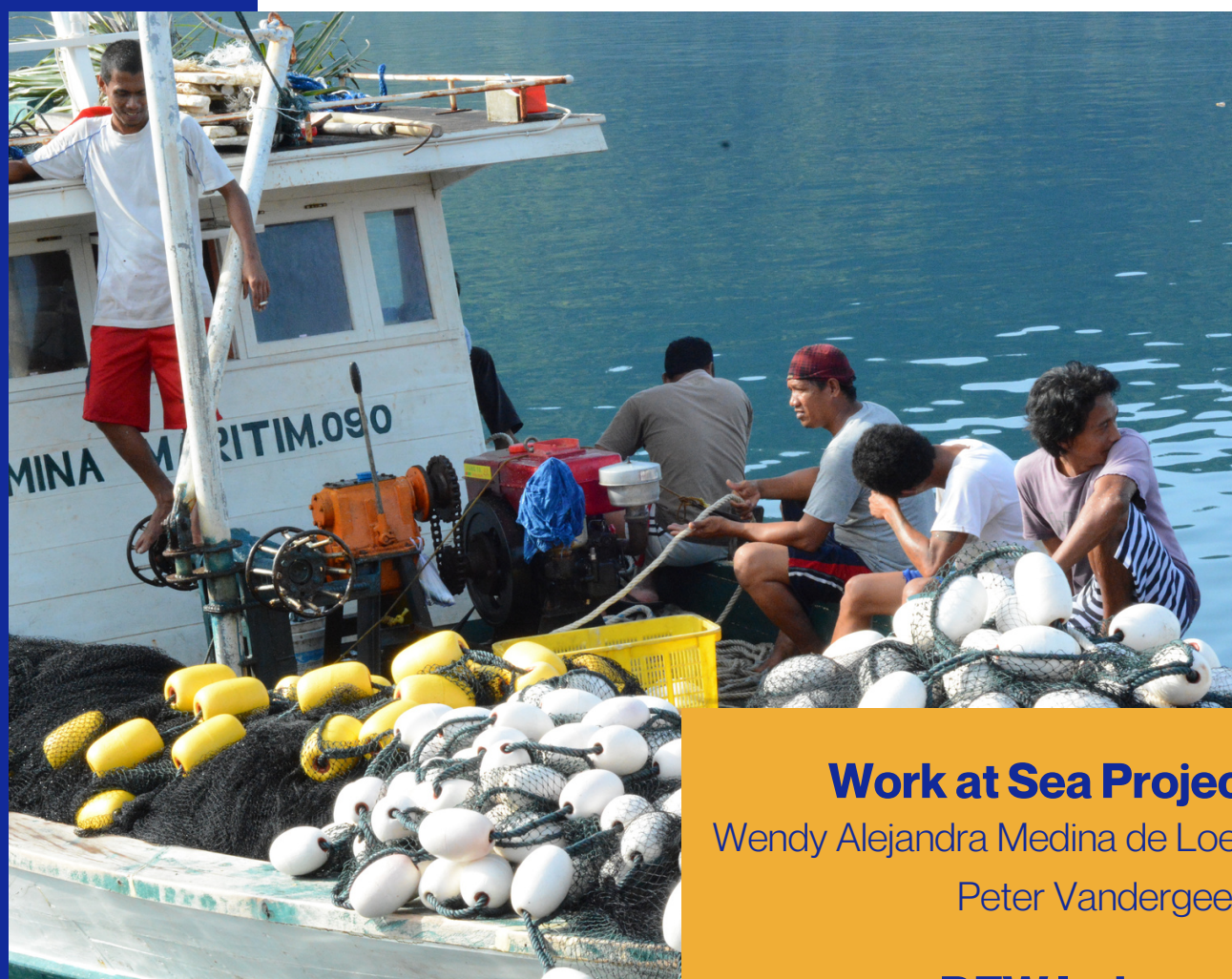




Potentials and Challenges for Indonesia-based Migrant Fish Worker Organizations

Policy Paper

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Work at Sea Project

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Destructive Fishing Watch Indonesia (DFW) is an Indonesia-based organization that brings together institutions and individuals concerned with destructive fishing practices or environmentally unfriendly fishing activities, IUUF, fisheries, human rights, poverty, climate change, conservation, and natural disasters in Indonesia.

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Work at Sea is a project that brings together a collective of university, faculty, graduate students and non-academic collaborators who aim to explain labour relationships and migrant workers in the global fishing industry. The team of researchers is based in York University (Toronto), the University of Ottawa, and the University of North Carolina-Chapel Hill.

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List of Acronyms

AP2I

Asosiasi Pekerja Perikanan Indonesia (Indonesia's Fish Workers Association).

CBAs

Collective Bargaining Agreements: A labour contract between a union representing the employees who are members of the union, and their employer. CBAs normally set the terms of employment including wages, complaint procedures, and various responsibilities and rights for both employees and employers. For CBAs discussed in this report, crewing agencies act on behalf of employers, who are the fishing companies, so that the CBAs are between unions and crewing agencies.

DWF

Distant Water Fisheries: Fishing fleets that operate outside of the Exclusive Economic Zone (EEZ, below) of the home country of the fishing companies, most often in the EEZs of other countries through access agreements, and sometimes on the high seas, that is, outside of the EEZs of any country. DWF fishing often takes place far away from the country where the fishing company is based.

EEZ

Exclusive Economic Zone: The area of ocean in which a state has exclusive rights to explore, exploit and manage resources, including exploitation and management of fisheries. The 1982 United Nations Convention on the Law of the Sea defines the EEZ as that part of the ocean extending 200 nautical miles (about 370 kilometers) beyond a country's territorial sea. The territorial sea extends 12 nautical miles (about 22 kilometers) from the coast, and is defined as that part of the ocean that is part of the territory of the coastal state.

ILO C-188

ILO Work in Fishing Convention: A convention under the International Labour Organization (ILO) of the United Nations that sets out basic standards for living and working on fishing vessels, and various responsibilities for both employees and employers. It applies to vessels registered to countries that have ratified this convention, and also provides for port inspections for compliance with these standards in ratifying countries. It was adopted by ILO membership in 2007, and entered into force in 2017 when a sufficient number of countries had ratified. The Work in Fishing Convention is intended to compensate for the exclusion of fishing from the Maritime Labour Convention, which sets out employment standards for all other seafarers except navies. As of 2025, ILO C-188 had been ratified by 24 countries, not including Indonesia. This compares to 110 ratifications for the Maritime Labour Convention.

ITF

International Transport Workers' Federation



KP3I

Kesatuan Pelaut dan Pekerja Perikanan Indonesia (Indonesian Seafarers and Fisheries Workers Unity).

KPI

Kesatuan Pelaut Indonesia (Indonesia's Seafarer Union).

P3MI

Perusahaan Penempatan Pekerja Migran Indonesia (Indonesian Migrant Workers Placement Company): A company that has received permission issued by the Minister of Manpower to recruit and place Indonesian workers abroad.

PM

Peraturan Menteri (Ministerial Regulation).

PP

Peraturan Pemerintah (Government Regulation).

PSP

Persatuan Solidaritas Pelaut Indonesia (United Indonesian Seafarers Solidarity).

SAKTI Sulut

Serikat Awak Kapal Perikanan Bersatu-Sulawesi Utara (North Sulawesi's United Fishing Vessel Crew Union).

SBMI

Serikat Buruh Migran Indonesia (Indonesian Migrant Workers' Union).

SBPI

Serikat Buruh Perikanan Indonesia (Indonesian Fisheries Workers Union).

SIUP

Surat Izin Usaha Perdagangan (Trading Business License): A written permit mandatory for entrepreneurs who undertake business activities in Indonesia. It is issued by local governments through their Trade Offices.



SIP2MI

Surat Izin Perekrutan Pekerja Migran Indonesia (Permit for the Recruitment of Indonesian Migrant Workers): A written permit granted to Indonesian companies that recruit Indonesian migrant workers (including fish workers) for placing these workers on jobs abroad. It is issued by the Head of the Indonesian Migrant Workers Protection Agency (known as BP2MI).

SIP3MI

Surat Izin Perusahaan Penempatan Pekerja Migran (Permit for Migrant Workers Placement Companies): A written permit for Indonesian corporation entities that will become P3MI (companies that place Indonesian workers abroad). It is issued by the Minister of Manpower of the Republic of Indonesia.

SIUPPAK

Surat Izin Usaha Perekrutan dan Penempatan Awak Kapal (Ship Crew Recruitment and Placement Business Permit): A permit for Indonesian companies that recruit and place Indonesian migrant ship crew abroad. It is issued by the Minister of Transportation of the Republic of Indonesia. Compared to SIP3MI (above), which covers migrant workers in general, SIUPPAK only covers migrant ship workers (seafarers).

SP PBB

Serikat Pekerja Pelaut Borneo Bersatu (Borneo Seafarers Union).

SPB

Serikat Pelaut Bulukumba (Bulukumba Seafarers Union).

SPPI

Serikat Pekerja Perikanan Indonesia (Indonesia's Fish Workers Union).

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Key Points



- Indonesia is one of the most important sources of workers for global fishing, and initiatives to improve labour standards in the sector need to involve these workers in formulating specific standards and monitoring and enforcing them; this requires that workers are organized into associations.
- Drawing on a field investigation, we describe three main kinds of Indonesia-based organizations for migrant fish workers: 1) large and small unions who sign collective bargaining agreements (CBAs) with the crewing agencies who arrange work placements with fishing companies based in other countries; 2) place-based support associations for workers and families based in home towns and districts; and 3) the transnationally-organized migrant worker union SBMI (*Serikat Buruh Migran Indonesia*).
- We analyze the distinct potentials and challenges that these three types of organizations have with respect to supporting migrant fish workers, participating in creating labour standards, and enforcing labour standards.
- We also identify areas of future research where additional information would be useful for working with worker organizations.



Executive Summary



Growing attention to unacceptable working conditions for migrant workers on the fishing vessels that supply much of the world's seafood has led to pressure to improve labour standards for industrial fishing. In response, governments in fishing countries such as Taiwan and Korea have been improving labour standards for fishing fleets under their jurisdiction, while some corporate seafood buyers are requiring their suppliers to meet private labour standards. There is a consensus that these initiatives need to involve workers in formulating specific standards based on how they experience their work, and also in monitoring and enforcing standards through grievance procedures that are trusted by vulnerable workers. This requires that workers are organized into associations that can participate in creating and enforcing regulations. It is notoriously difficult to organize fish workers while they are in their workplaces, however, in part because they are isolated at sea much of the time. One way of addressing this is to organize workers while they are in their home countries during the recruitment phase.

Indonesia, along with the Philippines, is one of the most important sources of workers in global fishing. This report presents the results of a field investigation into Indonesia-based organizations for migrant fish workers. The purpose is to assess the potentials and challenges of different types of organizations, as well as identify areas of future research where additional information would be useful for working with worker organizations. We describe the main kinds of organizations and their potentials and challenges with respect to supporting migrant fish workers; participating in creating labour standards; and enforcing labour standards. The research seeks to inform the work of advocacy groups, migrant worker support organizations, and migrant worker organizations; to guide government policy makers in Indonesia and in the home states and flag states for fishing fleets who hire Indonesian workers; and to identify questions that need further research.

Organizations of migrant fish workers in Indonesia include first, the large and small unions who sign collective bargaining agreements with the crewing agencies who arrange work placements with fishing companies based in other countries; second, place-based support associations for workers and families based in home towns and districts; and third, the transnationally-organized migrant worker union SBMI. The first group are affiliated with crewing agencies that registered with government offices (Ministry of Transportation and Ministry of Manpower) that require that the workers they recruit are members of unions that sign Collective Bargaining Agreements (CBAs) with these agencies. We call these **CBA unions** in English, although they use several different terms to identify themselves in Indonesian. The second are what we will call **associations** to distinguish them from the CBA unions; they are not affiliated with crewing agencies and do not sign CBAs. We can further classify these associations into (1) those that are place-based, that is, comprised of primarily of workers with homes in specific geographical areas on one hand, and (2) national or international networks, which for migrant workers from Indonesia means primarily SBMI, the umbrella union for migrant workers (discussed below). While migrant fish workers are recruited from many parts of Indonesia, most come from just a few areas, most importantly, north-central Java and North Sulawesi. These geographical concentrations make possible the place-based associations.



These different types of unions and associations have distinct potentials and challenges for organizing migrant fish workers to participate in shaping decent working conditions. Below we summarize these distinct potentials and challenges. We also consider how they can support workers and their families, including providing a channel for workers to report problems or violations of CBA provisions. We include some key questions that we cannot yet answer due to lack of reliable information, which we hope will be addressed in the future. In the main body we elaborate on the summary.

Unions with Collective Bargaining Agreements

Strengths

1. CBA unions negotiate agreements with crewing agencies, which allows them to influence practices that the crewing agencies can control or influence, especially recruitment practices, but also contractual provisions such as wages. Some unions also include the direct employers, the fishing companies, in their CBAs, which potentially permits influence in employment standards for matters under control of the fishing company as well as the crewing agency.
2. They have financial stability due to their ability to collect fees from members.
3. They can support workers in their disputes with employers.
4. They are well situated to provide training to workers because they establish contacts with workers through the crewing agencies during the period when they are preparing and waiting to go overseas.
5. Those that are large and/or are affiliated with large international unions can influence policy nationally and internationally.

Challenges

1. The data produced by this research indicates that the large CBA unions currently have weak connections with their workers. Our survey of migrant fish workers in Indonesia indicate that they have very limited knowledge of collective bargaining agreements and unions, and that they are mostly not aware that they are members of CBA unions. This is an area that needs more information, in order to assess how this might be changing.
2. Because their connections with most workers are weak, the evidence is that workers seldom go to their CBA unions for support when they have problems with employers.
3. CBA unions are dependent on crewing agencies for recruitment of members. Some research participants indicated that this creates an incentive to support crewing agencies rather than workers.



4. The CBAs contain a jurisdictional contradiction that undermines legal enforcement. Those CBAs to which we have access specify that Indonesian courts have jurisdiction in the case of disputes. This contradicts international law such as the UN Convention on the Law of the Sea and ILO Work in Fishing Convention (C-188), both of which specify that the vessel flag state has jurisdiction regarding labour standards.
5. CBA provisions are limited and difficult to enforce. While our information about the CBA standards is constrained, we can conclude that these standards do not clearly address many worker concerns voiced during our interviews. The standards are limited in part because they are based on general templates such as ILO C-188 which do not address many specific issues (e.g., Wi-Fi access, frequency of port visits), and in part because they are primarily with crewing agencies rather than the direct employers, the fishing companies, who control many working conditions of concern to workers.
6. An unknown number of workers are not covered by CBAs because some crewing agencies are not registered with the government agencies that require unions and a CBA.

Associations not Affiliated with Crewing Agencies

Strengths

1. Non-CBA worker associations have strong participation by workers. Place-based associations are inclusive of workers living within their geographical areas as well as their families, and membership is continuous over multiple contracts.
2. These associations are not dependent on maintaining good relations with crewing agencies, which allow them to be more autonomous and independent, relatively free of conflicts of interest.
3. They can be effective for providing information and sharing information among workers, for example, regarding crewing agencies, work placements, access to support, and worker rights.
4. They can provide effective support to migrant workers with serious problems, in part because workers are aware of their membership and what the associations can do. The larger umbrella unions (SBMI) and place-based associations have the capacity to pursue legal avenues in support of workers.
5. Place-based associations are able to support families as well as workers, and take a community-based approach in communities where many of the men are away from home to work abroad in fishing.
6. They can contribute to advocating for policy and regulatory changes, especially those who have the capacity to act at the national level and to join international networks. Their close connections with workers and their families means that they have good information of how workers understand their problems, which they can take to policy forums.



Limits and Challenges

1. Smaller associations have limited capacity to support workers, families, and communities, and to educate and inform workers, due to financial challenges. Some do not collect regular membership fees, and need to rely on community funds and other resources. Some of these organizations have received funding from international donors.
2. They cannot directly address the creation of standards for decent working conditions as they are not involved in CBAs with either crewing agencies or with direct employers.
3. Membership in place-based associations has geographical limits, so that workers from communities without these associations do not benefit from their educational and support activities.
4. Smaller associations do not have much policy influence despite their strong understanding of the concerns of migrant fish workers and families.

Recommendations

These are general recommendations, with the idea that different organizations can act on them according to how they are relevant to their activities and mandates.

CBA Unions

1. **For CBA unions, and government regulatory agencies:** Strengthen connections with union members to improve worker awareness of rights, CBA provisions, support channels, and grievance procedures. Make CBAs available to workers by posting online in Indonesian language, with videos that include explanations of worker rights and safe grievance procedures. The latter requirement could be included in government regulations that require crewing agencies to hire unionized workers.
2. **For CBA unions, crewing agencies, and fishing companies:** Address jurisdictional contradictions in CBAs by including the national laws and regulations administered by the competent authorities as specified in international law and conventions.
3. **For CBA unions, crewing agencies, and fishing companies:** Improve grievance procedures and worker awareness of grievance procedures. The procedures should aim to protect workers from retribution by having union representatives act for workers. The ITF inspectorate for compliance with the Maritime Labour Convention is an example of how grievance, inspection and enforcement procedures could be improved.
4. **For government agencies and organizations involved in CBAs:** Revise CBAs and CBA requirements so that they are not primarily with crewing agencies, but with the direct employers, that is, the fishing companies. Crewing agency's role could be restricted to recruitment, training, and logistics.
5. **For government agencies that set out requirements for CBAs, and other relevant organizations:** Address conflicts of interest that incentivize CBA unions to avoid actions in support of workers that might impact their positive relations with crewing agencies, for example, by changing to ongoing membership structure and payment of



fees by workers so that membership is not tied to signing contracts with crewing agencies.

6. **For government:** Increase enforcement of the requirement that crewing agencies are registered with government offices (Ministry of Transportation and Ministry of Manpower) that require they hire workers who are members of unions.
7. **For those involved in negotiating CBAs:** Broaden who can provide input into CBAs to include knowledgeable organizations and individuals, including the worker associations.

Worker Associations (no CBAs unions)

1. **For worker support and educational organizations:** Support and strengthen the associations' educational activities on migrant fish worker rights.
2. **For local governments and development funders:** Consider how community-based development funding can be used to support the work of place-based organizations without compromising their independence.
3. **For CBA unions and other support organizations:** Provide opportunities that would facilitate worker association input into the negotiation of CBAs. Consider also how place-based associations can work with CBA unions to address specific grievances where this might be appropriate.
4. **For support and educational organizations:** Prioritize reaching out to workers who do not benefit from membership in these organizations as they are particularly susceptible to exploitation by crewing agencies, and being allocated by crewing agencies to exploitative and abusive employers.
5. **For government and NGOs:** Consider how the participation by worker associations in policy forums can be enhanced.



Findings

Background and Rationale for the Investigation



Seafarers from Indonesia are one of the main sources of migrant workers for the global fishing industry. Indonesian, Filipino and Vietnamese workers comprise much of the work force in the Distant Water Fisheries (DWF) fleets that are based out of China, Korea, and Taiwan. They are also important in other industrial fisheries, both DWF fisheries, and fisheries in Exclusive Economic Zones (EEZ), that is, that operate in or near the vessel's home state's 200 nautical mile EEZ. Working conditions on these vessels are often notoriously poor, failing to meet most basic standards for decent work such as those included in the International Labour Organization's (ILO) Work in Fishing Convention—ILO C-188. Workers experience extremely long working hours, unsafe working conditions, abusive captains and work supervisors, poor food, and unhealthy water. On DWF vessels workers may also experience many months of isolation at sea without going to ports, sometimes more than a year. During these periods they often cannot use the vessel Wi-Fi, and thus cannot communicate with family, other fish workers, or support organizations. Wages are very low in relation to the high value of what they are producing, usually less on a per hour basis than the legal minimum wage in the fishing company's home country. Workers also experience many unexplained deductions from their wages. Workers face restrictions on their rights to leave abusive work situations, restrictions on access to port services in international ports, and they are often unaware of support organizations who could help them if they have severe problems in their workplaces.



Photo 1. A worker in a group discussion in Pemalang explains the work schedule on a Taiwanese longline vessel (Photo by Subhan Usman, DFW Indonesia)



Despite these difficult conditions, men from Indonesia continue to sign up for work on foreign fishing vessels, because the wages, while low by international standards, are good compared to the income they can generate in their home country.

The recruitment and placement of migrant workers in global fisheries is organized by crewing agencies located in worker home countries. Fishing companies or their agents abroad contract these crewing agencies to supply them with workers. The crewing agencies find workers, obtain the necessary documentation, provide training, and arrange travel to ports around the world where the workers board the fishing vessels. They often administer the payment of wages to workers or their families, and arrange other financial matters including insurance payments in case of worker deaths. These activities are controversial, and they are often portrayed as responsible for many problems—unreasonable and unexplained wage or insurance deductions, provisions in contracts that make it difficult for workers to leave abusive work situations, and failure to inform workers about the difficult nature of the work. When working conditions are framed as human trafficking, the crewing agencies are often among those who are considered to be the traffickers.

Increasing attention to the unacceptable working conditions for seafarers in fishing has provoked initiatives to strengthen employment standards and improve transparency for workers during the recruitment process. Some corporate trading companies or buyers of seafood now require their suppliers to meet private standards such as the Global Seafood Alliance's Responsible Fishing Standardⁱ and the F.I.S.H. standard for crew.ⁱⁱ Governments in major DWF fishing countries such as Taiwan and Korea are also improving employment standards for workers in their DWF fleets, drawing on the Work in Fishing Convention Standards as a template (Liu et al., 2024).

According to the United Nations Convention on the Law of the Sea, employment standards and labour relations are under the jurisdiction of the flag state of the vessel. In addition, fishing companies are the responsible party for the standards in the Work in Fishing Convention (ILO C-188), regardless of where they are based. For these reasons, organizations of migrant workers in global fishing that are based in and active primarily in Indonesia cannot easily directly influence employment standards and working conditions on the fishing vessels where the workers are employed. Worker home governments, including the Indonesian government, have no direct role in creating and enforcing labour standards on fishing vessels owned, operated, and flagged to other countries, although these governments can influence these standards through the regulation of what should be in individual contracts and collective bargaining agreements, or through bilateral agreements with flag states or states where fishing companies are based. These jurisdictional fragmentations also create challenges for fish worker organizations. This is one of the reasons that different kinds of worker associations are being organized, some based in the worker home countries, and some based in fishing ports, notably in Taiwan. In this report we focus on the former.



We focus the investigation on the following question.

What are the potentials and limitations of the different kinds of migrant fish worker organizations based primarily in Indonesia, in relation to participation in regulating and improving working conditions, providing avenues for addressing problems as experienced by workers, and providing support for workers' families and communities?

The research was organized through a collaboration between DFW-Indonesia and the Work at Sea Project at York University in Canada, during 2021 to 2023. We collected information through interviews with 6 worker organizations, 54 workers, 10 crewing agencies, and other knowledgeable organizations and individuals. We also drew on interviews and observation with workers and support organizations by the Work at Sea project team in ports around the world. This includes ports in Taiwan, Cape Town (South Africa), Ireland, and Hawaii. Finally, we draw on published research by other academics and civil society organizations including Greenpeace, SBMI, and the Environmental Justice Foundation.

Most of the crewing agencies that the research team interviewed had valid SIUPPAK (Ship Crew Recruitment and Placement Business Permits) permits, issued by the Ministry of Transportation, Directorate General of Sea Transportation. This is the most common permit among crewing agencies in Indonesia. One of the participant crewing agencies had a Ministry of Manpower P3MI permit. The latter is a permit for placing migrant workers more generally, and requires capital of 5 billion rupiah and a deposit of 1.5 billion rupiah (about USD 300,000 and 92,000 respectively), which is out of reach for most crewing agencies. We did not interview crewing agencies who had neither permit, and who often operate with a business licence issued by local governments.ⁱⁱⁱ

We sampled workers through snowball sampling methods. We contacted workers through DFW, two crewing agencies, and two non-CBA worker associations. In total, we spoke with 54 workers. Of these interviews, 24 were with workers who we defined as active by the criteria that they had worked abroad in fishing within the last two years. Interviews were semi-structured and included discussion about the workers' knowledge of unions and CBAs, their knowledge of worker rights, and their main concerns about their working conditions. In addition, we also talked with 5 workers who worked in foreign fishing since the early to late 1990s—whom we call the early generation crew. They provided worker-based accounts of changes in how workers have been recruited over the past three decades.



Photo 2. Interview with early generation migrant worker in Tegal. Violence against workers was very common on fishing vessels in 1990s (Photo by Subhan Usman, DFW Indonesia)

Findings

Formation and Types of Worker Organizations

The increasing recruitment, placement, and employment of workers from Indonesia into the global fishing industry has been associated with the emergence of diverse worker-based organizations. These include small, place-based support associations for workers and families, wider seafarer associations, an umbrella migrant worker union, and fish worker organizations in ports in Taiwan. Workers in Distant Water Fisheries (DWF) on vessels that seldom enter ports are less likely to join the port-based associations. Thus, the home country-based organizations are especially important for these workers.

Workers who are in Indonesia between contracts often have free time, providing an opportunity for worker organizations to contact and organize them. While in Indonesia, they are also able to interact with other migrant fish workers, with community leaders, and with support organizations. The most common locations for these interactions are in their home communities, or while assembled at the crewing agency facilities waiting to go overseas. Home communities and crewing agency facilities have thus become important sites for organizing migrant fish workers.

The worker organizations that have emerged in these sites can be classified into two broad types: (1) those that are affiliated with crewing agencies and sign Collective Bargaining Agreements (CBAs) with these agencies, which we call **CBA unions**; and (2) those that are not affiliated with crewing agencies and that do not sign CBAs. We call the second type ‘**associations**’ to distinguish them from the CBA unions. We can further classify these associations into two types. The first are placed-based, that is, comprised primarily of



workers with homes in specific geographical areas. The second are national or international worker networks, which in Indonesia is mainly SBMI. These different types of unions and associations have distinct potentials and limitations for workers organizing and for shaping decent working conditions for Indonesian migrant fish workers.

Worker Unions that have Collective Bargaining Agreements (CBA unions)

Examples of CBA unions include *Asosiasi Pekerja Perikanan Indonesia* (AP2I), Indonesian Fisherman Association (INFISA), *Kesatuan Pelaut Indonesia* (KPI), and *Serikat Pekerja Perikanan Indonesia* (SPPI). The two largest CBA unions for crew in foreign fishing of which we have knowledge are very large and growing in recent years. AP2I was established in 2021 and its membership has increased rapidly since then: from 1,500 members in 2021 (Ford et al., 2024), to 5,827 in 2023 according to AP2I's website that year, to 14,029 as of September 2025 (AP2I, n.d.-a). SPPI was established in 2014 and its membership has increased from 11,000 in 2024 (Ford et al., 2024), to 15,852 in January 2025 according to SPPI's website, to 24,856 as of October 21st 2025 (<https://sppifisheriesunion.com/>). Both have been raising their membership by increasing the number of crewing agencies with whom they sign CBAs.^{iv} In the case of AP2I, its records show that it has grown its membership by also increasing the number of CBAs per crewing agency, with a total of 115 CBAs signed by October 18th 2025 (AP2I, n.d.-b).

Other CBA unions are smaller, with fish worker membership in the hundreds. There are important differences between large and smaller CBA unions in terms of how workers participate, scope (only fishing workers or also seafarers in other sectors such as shipping), and the degree to which the fishing company employers may be involved in the CBAs. We cannot analyze these differences in detail as we do not have sufficient information about the contents of the CBAs, most of which are treated as confidential by the CBA unions and crewing agencies (below).

Membership in CBA unions is contingent upon whether workers have been recruited by the agencies with which the unions have CBAs. Members pay a monthly membership fee. We do not have specific information on how dues are collected and whether they are deducted from wages by the employer and advanced to the union (Ford et al., 2024, p. 30), paid by the employer, or some other mechanism.

Some CBA unions have been active for decades, while others have emerged more recently. KPI is an example of a union that has been active since at least mid 20th Century. It is the Indonesian seafarer union that is affiliated with the transnational umbrella union for seafarers, the International Transport Workers' Federation (ITF). KPI began as a union for seafarers in shipping and other maritime occupations, and at present migrant fish workers remain a relatively small proportion of its seafarer membership base. It has collaborated with crewing agencies since at least the early 2000s, according to the union's website (<https://kpiunion.org/media.php?module=sejarah>).



Most CBA unions in Indonesia, however, are comprised of only migrant fish workers, and were created following the proliferation of crewing agencies supplying migrant workers to global fishing. For example, INFISA, SPPI, and AP2I were formed in 2008, 2013, and 2021 respectively. Recent government policies have promoted the formation and growth of CBA unions. Ministerial Regulation No.59/2021 and the preceding Ministerial Regulation No.84/2013 (from the Ministry of Transport) require crewing agencies to have CBAs with trade unions to obtain permits to recruit and place seafarers in foreign fishing vessels. A CBA between an Indonesian union and a recruitment agency has also been a requirement in regulations of the Ministry of Manpower.^y These regulations have motivated Indonesian crewing agencies interested in obtaining permits to collaborate with unions, in some cases assisting in their formation.

Most CBA unions sign contracts with multiple Indonesian crewing agencies. Our ability to analyze CBAs is limited because we were able to obtain copies of only two CBAs, both from unions that have relatively small number of fishing worker members. Those large unions and crewing agencies whom we asked declined to provide an example CBA to our team, citing business confidentiality. For the large unions, we do not know whether fishing companies are parties to the CBAs, or whether crewing agencies negotiate and sign as their representatives. We also do not know how CBAs are negotiated, whether the fishing companies are directly involved in the discussion, or whether the crewing agencies negotiate on their behalf.

The CBAs with small unions do include the fishing companies as one of the parties to the agreement. In one of these CBAs, responsibilities of the fishing company include compliance with specific articles in ILO C188 and the F.I.S.H. standard. The second CBA included company responsibilities with respect to operational matters, wages, and crew responsibilities, without mentioning international standards.



Potentials of CBA Unions

1. Collective bargaining agreements can help regulate crewing agency practices

CBA unions negotiate agreements with crewing agencies, which allows them to influence practices that the crewing agencies can control or influence. This includes recruitment practices such as the fees charged by the crewing agency for recruitment and placement services. Since workers' contracts are often with the crewing agency rather than the fishing company, the unions have the potential to influence contractual provisions as well, such as wages.

The two CBAs that we have been able to examine are agreements among three parties: the union, the crewing agency and the fishing company. Both specify wages. In one CBA these are based on minimum wage regulations for the home country for the fishing company, and in the other the wages are significantly higher than the applicable minimum wage for the fishing company home country.^{vi} One of the CBAs also specifies that the fishing company pays various recruitment related fees and travel costs. This CBA cites ILO C-188 and the F.I.S.H. Standard for Crew as the source for many specific standards, plus the Seafood Task Force Social Audit and Recruitment Fee Guidance as the basis of list of allowable fees during recruitment. It includes provisions concerning matters that were mentioned by workers in our interviews (described below), such as adequate food, accommodation, and working hours. We do not know if CBAs with larger unions include these sorts of provisions.

2. Financial stability

CBA unions have financial stability at a basic level due to ability to collect union and recruitment dues.^{vii} Government regulations^{viii} stipulate that the amount of union member dues “will be regulated in the Articles of Association and Bylaws of each union.” CBA union participants in this research indicated that they consider the international norm to be a maximum of 1% of the workers' salary. Workers on Korean and Taiwanese DWF vessels draw salaries of about 550 USD, which would allow for union membership fees of 5.50 USD per month per worker. Typical salaries on Chinese fishing vessels are about half that, while workers in some coastal fisheries (e.g., Taiwan) are paid wages closer to 1,000 USD/month. The incomes that CBA unions reported to us were somewhat lower than the 1% of monthly wages for wages of 550 USD. One mentioned 30,000 IDR/month per worker (about 2.00 USD), and another 50,000 IDR/month per worker (3.00 USD) while the worker is active. For a union with 1,000 active members, that would be 30,000,000 IDR/month (about 1,800 USD/month), or 360 million IDR/year (about 21,600 USD/year).



In addition, some participants^{ix} reported that when workers sign a contract with crewing agencies, they are required to pay between 30 to 50 USD to the union that has a CBA with the crewing agency. These fees do not appear in the contracts that we have seen, meaning that those unions who collect them do so separately from the formal contract listing fees.

Regardless of how the union dues are paid, whether deducted from worker wages by crewing agencies or by international employers, or by some other mechanism, the source of the funds are the payments in USD by international employer. They are enough for larger unions to be able to generate sustained and predictable incomes. Because income levels are based on the total number of union members plus new recruits, CBA unions have a strong financial incentive to increase membership through recruitment, which they can achieve by working with and signing CBAs with crewing agencies.

Some larger CBA unions also receive some financial and other forms of support from international donors including Freedom Fund and Humanity United (interviews, and Ford et al., 2024). But their ability to generate funding through worker fees also means that, unlike NGOs, they are less dependent on international funding and all that entails, including a need to take into account the funders' priorities.



Photo 3. Interviews with workers and association staff in Pemalang about, among other things, workers' understanding of unions (Photo by Subhan Usman, DFW Indonesia)



3. Grievances mechanisms and worker support

CBA Unions have the potential to provide a safe channel for workers to report violations of standards and other workplace issues. Safe grievance procedures are crucial for work in industrial fishing because workers are extremely vulnerable to captains during long periods at sea, and many captains routinely abuse workers mentally and sometimes physically, while forcing long hours of work under unsafe conditions. At the same time, workers are reluctant to report abuses and violations to government port inspectors or to other inspectors whom they do not trust. While our evidence is that current practice falls short of this potential (see below), CBA unions have the potential to provide safe grievance procedures.

Participants in our fieldwork who had administrative positions with CBA unions said that their unions have been able to support their members and address the issues that have arisen because the unions play the role of mediators between workers and Indonesian crewing agencies. Ford et al. (2024) confirms that CBA unions have been active in supporting workers with workplace problems. In our interviews, participants speaking for larger CBA unions described their relationship with crewing agencies as a partnership that helps to properly address problems that might arise for workers, without going through long and time-consuming dispute settlement processes that involve third parties such as the labour office, the Ministry of Manpower or even the Industrial Relations Court. They explained that the dispute settlement mechanism that they prioritize is deliberation or *musyawarah* which involves a serious discussion to find a solution, between the union as the representative of the worker and the Indonesian crewing agency as the representative of the company owner. The union participants mentioned non-payment of salaries by vessel owners as the sort of disputes in which they could support workers. They also indicated that their unions have provided support for member workers and their families.^x

The grievance procedures in the two CBAs for small unions to which we have access both specify that complaints need to be presented first to the vessel captain, then the employer. One CBA specifies that workers go to the union if they are not satisfied at this stage, and the other specifies that the grievance process should be through a designated worker representative on board the vessel. While the inclusion of grievance procedures points to the potential of CBA unions, we discuss below some ways that these procedures could better support workers who have problems with captains, their employer, or crewing agency.

The Indonesia-based CBA unions can also help crewing agencies to be in communication with international affiliates^{xi} when problems arise abroad, and they can serve as the link with foreign actors such as ship owners/fishing companies, port-based agents working for the fishing companies, and port-based worker associations or worker support organizations. This kind of networking could be important as transnational labour organizing can be key to overcoming the fragmentation of jurisdiction over labor and working conditions for migrant workers in global fishing. However, further investigation is needed as we do not have information on affiliations with international seafarer unions for



most CBA unions, or what these affiliations mean in terms of international networking and worker organizing.

4. Educational programs

CBA unions participate in providing training to workers as they prepare to go overseas. During our fieldwork we observed intensive training offered by one of the smaller CBA unions, which was oriented to the skills needed to work on an industrial fishing vessel. Larger unions such as AP2I and SPPI provide educational programs, including in villages, on recruitment procedures (Ford et al., 2024, p. 12). A key question concerns the content of these programs—whether they currently include training on worker rights and grievance procedures, and their potential for this kind of training. We address this question in the challenges section below.^{xii}

5. National and international policy advocacy

The large CBA unions can use their visible presence and funding to influence policy both nationally (Ford et al., 2024, p. 19) and internationally. Internationally, they participate in networks that seek to influence policies in some of the countries that are home to the fishing companies that employ Indonesian workers, including Korea and Taiwan.^{xiii} An example is the Coalition for the Protection of Indonesian Migrant Workers in Taiwanese Fishing Vessels^{xiv} which is lobbying the governments of Indonesia and Taiwan to cooperate to improve the protection of human and labour rights of Indonesian workers on Taiwanese vessels. Participants include SPPI, along with some larger place-based worker associations (discussed below); worker organizations based in Taiwanese ports; and labour justice NGOs. CBA unions who are connected with international union and labour networks also facilitate communication among Indonesian crewing agencies, foreign fishing companies and their agents.



Challenges for CBA Unions

We raise these challenges in the spirit of appreciating what the CBA unions have accomplished, and their potential for doing more to organize and advocate for migrant workers in fishing.

1. Improve worker awareness of their union membership and their rights

None of the 24 active migrant seafarers that we interviewed in 2023 knew what a CBA was, and only two responded that they knew what a trade union was. In our research with Indonesian fish workers in ports around the world, no worker mentioned their union membership or a CBA.^{xv} The one exception was a worker in the port of Montevideo who showed our researchers a KPI card, although he did not realize it was a KPI card and that it had expired. This indicates that educational activities by CBA unions have not been broadly effective in producing awareness of either their union membership, or their right to working conditions that meet the standards in the CBAs.^{xvi} This lack of awareness also means that most workers have no influence on the content of the CBAs. While our interviews were consistent with respect to lack of worker awareness, further research is needed to better document worker awareness of unions and CBAs.



Photo 4. Group discussion with workers in Pemalang about work facilities that need to be improved (Photo by Subhan Usman, DFW Indonesia)



Many CBA unions do not make the content of the CBAs public, so that workers and their support organizations cannot refer to the standards or complaint procedures in these CBAs. Posting CBAs online in Indonesian, with short videos explaining the CBA provisions including grievance procedures, could significantly improve awareness among workers and support organizations.

We do not know if this lack of awareness and participation extended to smaller CBA unions. The smaller scale of their activities and the intensive training we observed as offered by one of these unions suggests that they may be more connected with their membership than the larger unions, but this needs more investigation.

2. Inadequate grievance procedures and awareness of grievance procedures

Workers who are not aware of their union or CBA are not likely to report problems to the union, or to enlist CBA unions to support them in disputes with their employers. In our research with support organizations in international ports (e.g., Vandergeest et al., 2021), and in research reports published by NGOs and other groups (e.g., Greenpeace & SBMI, 2021), we have not yet seen any specific cases where workers approach their CBA unions for such support, or where workers use grievance procedures included in the CBAs.^{xvii} This may be changing, as some recent publications indicate that the unions do sometimes provide such support (Ford et al., 2024). Given the confidential nature of dispute resolution through CBA unions, it is also possible that our researchers were not told about specific cases of workers whose complaints were channelled through the CBA unions.

The vulnerability of migrant fish workers to retribution by captains during long periods of isolation at sea means that grievance procedures need to provide strong protection for workers who report violations. To provide this protection, complaints should as much as possible be brought forward by union representatives who are trusted by workers, or other worker support organizations, rather than the workers themselves. Ideally there would be a union presence on vessels, or a channel through which workers can communicate with their unions while at sea. Port inspections for violations of employment standards are best carried out by union-affiliated inspectors, rather than or in addition to government inspectors, following the model of the ITF inspectorate for shipping. Anonymity, while difficult, would also help counter possible blacklisting by crewing agencies of workers who complain.

The procedures in CBAs to which we have access are mixed in this regard. One provides for an on-board union representative to present the grievance, and includes a stipulation that vessels should have a designated representative of the crew for the purpose of addressing grievances, although it did not specify how that representative should be designated. The grievance procedure in this CBA specifies that workers who feel that they have been treated unfairly should have the representative take the complaint to the immediate superior, and if the problem is not addressed to the satisfaction of the worker,



appeals can be made along the hierarchy within the fishing company. The second CBA available to us does not make provisions for a vessel-based representative of crew. It states that workers should go first to the skipper, then the employer, then the union, and if the grievance is still not resolved, to Indonesian jurisdiction, first the Ministry of Transportation, then an Indonesian labour court. The last provision raises the question of whether the fishing company has a legal obligation to obey the rulings of the Indonesian authorities, as outlined above.

We have not been able to access CBAs for the larger unions, so that we cannot assess those grievance procedures.

3. Conflicts of interest

Some key informants mentioned that the ability of CBA unions to advocate for workers is limited by a conflict of interest: The unions are dependent on crewing agencies for recruitment of members, and either directly or indirectly, for the collection of union fees. This creates an incentive to act in the interest of crewing agencies, and can limit the unions' support for workers. Some participants in this investigation argued that CBA unions were often more concerned with instructing workers to not cause problems for their employers than with advocating for them, because of their dependency on continued good relations with the crewing agencies. This indicates a need to explore how CBA unions can recruit members in processes that are separate from crewing agencies, become more accountable to their membership, and less accountable to crewing agencies and employers.

4. Include the relevant competent authorities concerning labour on vessels as specified in international law and conventions

The CBAs that we were able to access specify that Indonesian courts have jurisdiction in the case of disputes. This contradicts international law including the UN Convention on the Law of the Sea and ILO C-188, both of which specify that the vessel flag state has jurisdiction regarding labour standards. ILO C-188 further specifies that it is the fishing vessel owner who has the responsibility to ensure that skippers have the resources to comply with the obligations in the convention, that skippers are responsible for working conditions on the vessel, which brings in the jurisdiction of government authorities in the home country of the fishing company. This jurisdictional contradiction compromises the enforceability of CBAs.



We thus suggest that CBAs should include provisions concerning legal jurisdiction of the flag state and the state of the vessel owner. The CBA could also specify the competent authority with respect to potential complaints or violations of CBA provisions, which should include flag state authorities, and authorities where the fishing company is legally owned. For example, for vessels owned in and flagged to Taiwan, the competent authority would be the Taiwan Fisheries Agency. In practice the Taiwan Fisheries Agency often intervenes to adjudicate problems reported by workers on vessels owned in Taiwan. Stella Maris (2023) in Kaohsiung in Taiwan reports it provided legal assistance to workers primarily by filing complaints with the Fisheries Agency in Taiwan, and in our research in other ports involving Taiwanese vessels, complaints were also referred to the Taiwan Fisheries Agency. This is in part because it has the authority to order fishing companies to take action to address complaints.

5. Limited standards

While international standards such as those comprising ILO C-188 provide an important basis for CBAs, these broad standards do not reflect all the specific concerns of workers. For example, C-188 has no standards concerning workers' rights to access Wi-Fi while at sea, or for maximum length of time at sea without workers being able to access to port services. When asked about the possibility of including in the CBA a stipulation that a worker in DWF fishing should be able to go to a port every three or six months, a CBA union respondent said that the union cannot set such a requirement.

One reason for the limited scope of standards is that the CBAs are primarily with the crewing agency rather than direct employer. This sets limits on the CBAs as a mechanism for enforcing many of the workplace conditions that workers have identified as being of most concern to them. These conditions include wages, working hours, adequacy of food and water, accommodations, health and safety, access to Wi-Fi, and frequency of port visits, all of which are controlled by the fishing company, not the crewing agency.^{xviii} It is primarily the fishing company that determines wages, and the fishing companies often base wages on minimum wage regulations for DWF or coastal fisheries as issued by their home country.^{xix} This also applies to insurance and other financial aspects of the contract. In our interviews, workers also highlighted unsafe equipment, working hours, adequate food, and drinkable water as important concerns. These are all under the control of the fishing company and vessel captain, rather than the crewing agency with whom the union signs the CBA. The CBA unions can work through the crewing agencies to ask the fishing companies to improve these practices, but neither the union nor the crewing agency have direct control in these matters.

Key aspects of working conditions vary significantly by type of vessel, (e.g., longliner, purse seiner) and location of fishing (coastal, high seas, warm or cold climates) (MacDonnell & Vandergeest, 2024). To the degree that CBAs are primarily with crewing agencies rather than the vessel owners, they can be limited in their ability to include standards specific to the vessel type. When the CBAs are directly with the fishing company, it is possible to include these sorts of provisions. One of the two CBAs that we were able



to examine included the fishing company as a party to the agreement, and specified a list of longliner vessels on which workers will be placed. This CBA incorporated some detailed provisions concerning clothing and work equipment specific to this vessel type. This approach could be extended to include a full range of working conditions specific to vessel types that are important to workers.

6. Limited coverage of CBA unions

An unknown number of crewing agencies are not registered with those government agencies that require a CBA with unions. Many workers are thus not covered by CBAs, and are not members of unions.^{xx} That some workers are under a CBA and others are not potentially marginalizes non-union members from protections provided to those who are covered by CBAs and union membership.^{xxi} In addition, workers continue to be members of CBA unions only when they are active workers. Thus, the workers who are between contracts have no formal access to the services provided by the CBA unions during this time. This can affect rights such as accident and life insurance.



Photo 5. Interview with village officials in one of the villages of origin of migrant workers in Brebes Regency (Photo by Subhan Usman, DFW Indonesia)

Other questions

The content of CBAs is limited by the need to comply with government regulations. CBAs (with crewing agencies with SIUPPAK permits) are required to be in accordance with PP No. 7/2000 and PM 59/2021, and not contradict the content of these regulations. Otherwise, the CBAs are not approved by the Ministry of Transportation. This raises concerns about the extent to which CBAs reflect workers' interests rather than government and crewing agency interests. This also raises questions about the extent to which CBAs can be updated to the contemporary circumstances (for example—provisions concerning access to Wi-Fi), or tailored to the specific nationality and type of fishing vessels. These are areas for further research.



Associations not Affiliated with Crewing Agencies

As mentioned above, we can classify the worker associations that do not negotiate CBAs into two broad types: Those that are place-based, that is, based in workers' home communities; and those that are organized at national or international scales. The place-based associations are comprised of workers with homes and families in specific geographical areas, although they are sometimes also active internationally on behalf of these workers. While migrant fish workers are recruited from many parts of Indonesia, most come from a few specific geographical areas, with distinct regional languages and cultural practices, which facilitates the formation of place-based organizations. Place-based associations are different in size and scale. Some are small, relatively invisible village-level organizations comprised of migrant workers and their families, while others are larger, well-known regional organizations.

The two most important and well-known source areas for migrant fish workers are north-central Java and North Sulawesi. Examples of place-based associations in these areas include *Serikat Awak Kapal Perikanan Bersatu-Sulawesi Utara* (SAKTI Sulut) based in Sulawesi, and *Persatuan Solidaritas Pelaut Indonesia* (PSP) based in Java. Associations based in other parts of Indonesia include *Serikat Pekerja Pelaut Borneo Bersatu* (SP PBB) in South Kalimantan, *Serikat Pelaut Bulukumba* (SPB) in South Sulawesi, *Serikat Buruh Perikanan Indonesia* (SBPI), and *Kesatuan Pelaut dan Pekerja Perikanan Indonesia* (KP3I). Place-based associations can be very important for workers seeking support or information, for example, about the reputation of different crewing agencies, or about their rights with respect to accident and life insurance payments. Further research is necessary to better understand these associations, how they are organized, the work they do, how they interact with each other, and their potential for supporting migrant fish workers and their families.

Place-based associations vary in geographical reach of their networking. For instance, SAKTI Sulut can be characterized as having a national and international presence as it is networked with the national Indonesian organization Destructive Fishing Watch, works with the Freedom Fund (Ford et al., 2024) and is often mentioned by international labour rights and ocean conservation organizations. But the main work of place-based associations is within the home communities from which migrant fish workers are recruited, and their geographical reach is often limited to the geographical area identified with these communities.

The second broad type of worker associations are national or international worker networks. For migrant fish workers from Indonesia, this refers primarily to the migrant worker union SBMI (*Serikat Buruh Migran Indonesia*). SBMI has a presence across Indonesia and has international reach.



Photo 6. Interview with workers and a workers association administrators in Pemalang Regency
(Photo by Subhan Usman, DFW Indonesia)

Membership in the non-CBA worker associations is open for any Indonesian seafarer in fishing who is willing to join, subject to limits based in the geographical areas covered by the place-based associations. Members of place-based workers associations almost exclusively reside in either the same area where the association is headquartered or in adjoining areas. Some of these associations will assist workers from more distant geographical areas if they contact them in the search of assistance.

SBMI's membership is not limited by workers' place of origin. SBMI recruits from prospective workers who consult with them before going overseas or who seek assistance from SBMI. They also recruit through the educational campaigns they undertake in sending areas in Indonesia, or in places where Indonesian migrant workers are concentrated overseas, such as ports for migrant fish workers. SBMI was set up as a union with membership open to all migrant workers from Indonesia, so that fishing work is just one component of a much larger organization. This means that fish workers who become members and seek support from SBMI can access considerable expertise and other resources. However, only a small proportion of fish workers are members (1,700 members out of approximately 5,000 members in 2023 were fish workers).

The activities of placed-based worker associations are oriented to assisting workers and their families; on providing them with information about their rights and employers; and on creating spaces for exchanging information with other workers. SAKTI Sulut also offers legal assistance (Ford et al., 2024, p.19). SBMI supports workers through a broad range of activities including provision of educational resources on labour rights and employment, legal aid, policy advocacy and campaigns around specific issues.



Strengths

1. Strong member participation

The place-based associations are especially strong in this regard as they work through existing community practices, are inclusive of workers living within their geographical areas and often their families as well, and membership is continuous over multiple contracts.

2. Autonomy

These associations are relatively autonomous and independent, free of conflicts of interest with respect to advocating for workers. They do not need to be concerned about losing members and income if they are critical of crewing agencies, fishing companies or other organizations involved with supplying workers and governing the working conditions for migrant workers in global fishing.

3. Education and provision of information

Strong membership participation and inclusion among place-based associations means that they can be effective for providing information to workers, and for sharing information among workers. This is especially the case for place-based associations, although it is notable that SBMI is also active in village-based education with prospective migrant workers. Both of these types of organizations create forums in which workers share information concerning their experiences with specific crewing agencies and employers, worker rights, and where they can look for support in Indonesia or abroad. These associations are thus important for raising awareness and preparing workers to be better informed for their encounter with Indonesian crewing agencies and for working conditions on vessels. They thus have the potential to also address workers' lack of awareness of CBAs and CBA unions through their educational endeavours.

4. Supporting workers with problems

Overall, both place-based and umbrella associations have been relevant for both helping to address specific cases of workers who face problems, including some workers who are not their members.^{xxii} The larger associations have capacity to provide legal support for workers who go to them with complaints. SBMI is often contacted for support when workers run into serious trouble while overseas, because of its international profile and visibility. Greenpeace and SBMI (2021, 2024) report that SBMI handled over a hundred cases of complaints by Indonesian migrant fishers during 2019 to 2024.



5. Support for workers and communities

Because they are based in home communities, place-based associations are often oriented to providing support for worker families as well as workers. The involvement of families is important not only because they need to live without key family members for long periods of time, but also because some families need to support workers who have been injured or with physical and mental health problems as a result of their work in fisheries. Workers who experience serious problems while abroad often report these problems to families. More broadly, place-based associations can take a collective community-based approach to addressing the community issues involved with sending many men abroad to work in fishing.

6. Potential policy influence among larger and well networked associations

Umbrella organizations are able to engage in national level policy discussions, and join international networks. While the non-CBA worker associations do not directly participate in creating standards through CBAs, their close connections and interactions with workers enables them to listen to workers priorities, and to gather from workers relevant information regarding what they see as important concerning their working conditions. SBMI has been present in many international forums where standards and problems faced by fish workers are discussed, so that they can influence the formation of standards for recruitment and for working conditions on vessels in ways that reflect worker concerns. They have also worked with Greenpeace Southeast Asia to advocate for policy changes through analysis of workers whose cases they are handling, in relation to indicators of forced labour.



Challenges

1. Financial limits

Many worker associations experience financial challenges, as most do not collect regular union dues. This limits what they can do with respect to other activities including worker support and education. Smaller place-based associations in particular often have very limited financial and other resources. They need to raise funds by requesting financial support from members or home community associations. Some of these associations struggle financially even to be formally registered. A few, mostly larger and more visible associations, have been able to organize sustained income. SAKTI Sulut, for example, has established membership fees linked to access to services (Ford et al., 2024), which enhances their capacity to participate in activities reviewed here. The more visible associations have also received funding from national and international organizations.

2. No direct influence on employment standards through CBAs

Worker associations that do not become involved in negotiating CBAs cannot influence the creation of CBA standards for decent working conditions.

3. Limit on geographical scope could marginalize some workers

Membership in place-based associations has geographical limits, and workers from communities without these associations do not benefit from their educational and support activities. Preliminary evidence suggests that these less networked and supported workers are more likely to be recruited by less reputable crewing agencies and to accept contracts to work on less desirable vessels (especially the poorly paid and sometimes abusive Chinese vessels).

4. Weak policy influence for smaller grassroots associations

The smaller associations may not have much policy influence due to their lack of visibility and often informal status. Their participation in policy making would be beneficial in that they are often close to workers and worker families, and understand their concerns and problems.

References



- Asosiasi Pekerja Perikanan Indonesia (AP2I). (n.d.-a). *Grafik*. <https://ap2i.or.id/grafik/>
- Asosiasi Pekerja Perikanan Indonesia (AP2I). (n.d.-b). *Kemitraan*. <https://ap2i.or.id/kemitraan/>
- Badan Nasional Penempatan dan Perlindungan Tenaga Kerja Indonesia (BNP2TKI). (2013). *PER- 12/KA/IV/2013 tentang Cara Perekrutan, Penempatan dan Perlindungan Pelaut di Kapal Berbendera Asing*. [https://jdihn.go.id/files/7/PERKA NO 12 Tahun 2013 Tentang Tata Cara Perekrutan Penempatan dan Perlindungan Pelaut di Kapal Berbendera Asing.pdf](https://jdihn.go.id/files/7/PERKA_NO_12_Tahun_2013_Tentang_Tata_Cara_Perekrutan_Penempatan_dan_Perlindungan_Pelaut_di_Kapal_Berbendera_Asing.pdf)
- Best Seafood Practices. <https://bspcertification.org/>
- Dedi Somplak. (2023, March 18). *Briefing Anggota AP2I | PT. Mega Pratama Samudra Pemalang* [Video]. YouTube. <https://www.youtube.com/watch?v=tFjYyNQJHRg>
- Dedi Somplak. (2023, March 25). *Briefing Anggota AP2I | PT. Duta Samudera Bahari Pemalang Jawa Tengah* [Video]. YouTube. <https://www.youtube.com/watch?v=rY6bsk5ilPY>
- Fathulloh. (2014, Abr 4). Miliki KTKLN, 74 ABK Masih Jadi Korban Perdagangan Orang. *Pusat Sumber Daya Buruh Migran*. <https://buruhmigran.or.id/2014/04/04/miliki-ktkln-74-abk-masih-jadi-korban-perdagangan-orang/>
- Ford, M., Hasbiyalloh, B. & Palmer, W. (2024). Labour Rights in Indonesia's Seafood Sector. University of Sydney, Humanity United, and the Freedom Fund. Available at: https://cdn.freedomfund.org/app/uploads/2024/03/LabourRightsIndonesiaSeafoodSector_2024.pdf
- Greenpeace in collaboration with SBMI. (2021). Forced Labour at Sea: The Case of Indonesian Migrant Fishers. Available at https://www.greenpeace.org/static/planet4-southeastasia-stateless/2021/05/ef65bfe1-greenpeace-2021-forced-labour-at-sea-digital_final.pdf
- Greenpeace in collaboration with SBMI. (2024). Netting Profits, Risking Lives: The Unresolved Human and Environmental Exploitation at Sea. Available at <https://www.greenpeace.org/static/planet4-southeastasia-stateless/2024/12/4064c1f5-greenpeace-seabound-3.0-2024-final.pdf>
- Inakor. (2024, May 8). Diduga Menjadi Korban TPPO 8 ABK Migran Laporkan PT. KJS Ke Bareskrim Polri. *Inakor.id*. <https://inakor.id/diduga-menjadi-korban-tppo-8-abk-migran-laporkan-pt-kjs-ke-bareskrim-polri>



- Indonesian Ocean Justice Initiative (IOJI). (2020). *Perbaikan Tata Kelola Pelindungan ABK Indonesia di Kapal Ikan Asing*. Policy Brief 3. Jakarta: IOJI. <https://oceanjusticeinitiative.org/mdocs-posts/policy-brief-ioji-tentang-perbaikan-tata-kelola-pelindungan-abk-indonesia-di-kapal-ikan-asing/>
- International Labour Organization Convention on Work in Fishing (No. 188), 2007, https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C188
- International Organization for Migration (IOM). (2023). Navigating Indonesian Migrant Fishers: a study on the recruitment and placement process of Indonesian migrant fishers in the Republic of Korea. Available at https://indonesia.iom.int/sites/g/files/tmzbd1491/files/documents/2023-12/03_english_study-on-indonesian-migrant-fishers-in-the-republic-of-korea.pdf
- Kesatuan Pelaut dan Pekerja Perikanan Indonesia (KP3I). <https://kp3i.org/>
- Kesatuan Pelaut Indonesia (KPI). (n.d.). *Sejarah Organisasi Kesatuan Pelaut Indonesia*. <https://kpiunion.org/media.php?module=sejarah>
- Liu, W. H., Hung, P.C., Vandergeest, P., Jaleel, A., Ciceri, B., & Lin, C. C. (2024). Protecting Migrant Labor Rights in the Distant-Water Fisheries Sector: A Comparative Analysis of the Legal Framework of Three Major Fishing Nations in Eastern Asia. *Reviews in Fisheries Science & Aquaculture*, 33(3), 466-484. <https://doi.org/10.1080/23308249.2024.2436415>
- MacDonnell, M. & Vandergeest, P. (2024). Fisher experience on distant water fishing vessels: the implications of variation by vessel type for employment standards. *Maritime Studies*, 23, Article 24. <https://doi.org/10.1007/s40152-024-00365-1>
- McBride, O. (2024, May 19). Historic Coalition Demands Protection for Indonesian Migrant Fishers. *The Fishing Daily*. <https://thefishingdaily.com/international-fishing-news/historic-coalition-demands-protection-for-indonesian-migrant-fishers/>
- Ministry of Indonesian Migrant Workers Protection/Indonesian Migrant Workers Protection Agency. (n.d.). *List P3MI*. Retrieved September 26, 2025, from https://siskop2mi.bp2mi.go.id/profil/lembaga/list_lembaga/p3mi
- Ministry of Manpower and Transmigration. (2004). *Keputusan Menteri Tenaga Kerja dan Transmigrasi Nomor Kep.187/Men/XI/2004 tentang luran Anggota Serikat Pekerja/Serikat Buruh*. <https://www.llg-bwi.org/regulation/326>
- Ministry of Transportation. (2013). *Peraturan Menteri Perhubungan Nomor 84 Tahun 2013 tentang Perekrutan dan Penempatan Awak Kapal*. <https://peraturan.bpk.go.id/Details/147735/permenhub-no-84-tahun-2013>



- Ministry of Transportation. (2021). *Peraturan Menteri Perhubungan Nomor 59 Tahun 2021 tentang Penyelenggaraan Usaha Jasa Terkait dengan Angkutan di Perairan*. <https://peraturan.bpk.go.id/Details/284692/permenhub-no-59-tahun-2021>
- Ministry of Transportation. (2021). *Peraturan Menteri Perhubungan Nomor 12 Tahun 2021 tentang Standar Kegiatan Usaha dan Produk Pada Penyelenggaraan Perizinan Berusaha Berbasis Risiko Sektor Transportasi*. <https://peraturan.bpk.go.id/Details/169235/permenhub-no-12-tahun-2021>
- Ministry of Transportation. (n.d.). *Surat Izin Usaha Perekrutan dan Penempatan Awak Kapal (SIUPPAK)*. Retrieved September 26, 2025, from <https://dokumenpelaut.dephub.go.id/listsippak>
- President of the Republic of Indonesia. (2000). *Peraturan Pemerintah Nomor 7 Tahun 2000 tentang Kepelautan*. <https://peraturan.bpk.go.id/Details/53151/pp-no-7-tahun-2000>
- President of the Republic of Indonesia. (2000). *Undang-Undang Nomor 21 Tahun 2000 tentang Serikat Pekerja/Serikat Buruh*. <https://peraturan.bpk.go.id/Details/44988/uu-no-21-tahun-2000>
- President of the Republic of Indonesia. (2022). *Peraturan Pemerintah Nomor 22 Tahun 2022 tentang Penempatan dan Pelindungan Awak Kapal Niaga Migran dan Awak Kapal Perikanan Migran*. <https://peraturan.bpk.go.id/Details/211685/pp-no-22-tahun-2022>
- SBMI. (2019). SBMI Tegal tuntutan PT Pacifik Ocean Abadi Kembalikan Dokumen. *SBMI*. <https://sbmi.or.id/sbmi-tegal-tuntut-pt-pacifik-ocean-abadi-kembalikan-dokumen/>
- Serikat Pekerja Perikanan Indonesia (SPPI). <https://sppifisheriesunion.com/>
- Stella Maris Kaohsiung. (2023). Protecting and Empowering seafarers and fishers. Available at <https://stellamaris.org.uk/wp-content/uploads/2023/04/Stella-Maris-Kaohsiung.pdf>
- The FISH Standard. <https://fishstandard.com/>
- United Nations Convention on the Law of the Sea, December 10, 1982, https://www.un.org/depts/los/convention_agreements/convention_overview_convention.htm
- Vandergeest, P., Marschke, M., & MacDonnell, M. (2021). Seafarers in fishing: A year into the COVID-19 pandemic. *Marine Policy*, 134. Available at <https://doi.org/10.1016/j.marpol.2021.104796>

Appendix



In three group discussions with 13 migrant seafarers in fishing, our researcher asked workers what they would like changed. Table 1 shows the results.

Table 1. Results of group discussions regarding aspects related to working conditions that need to be improved.

need to be improved.

Aspects	Crew Members' Answers													%
	Group Discussion 1 (4 participants)				Group Discussion 2 (5 participants)					Group Discussion 3 (4 participants)				
	1	2	3	4	1	2	3	4	5	1	2	3	4	
Wage improvement (pay hike)	☐	☐	☐	☐	☐	☐								46
Working hours improvement	☐		☐	☐	☐			☐	☐					46
Food improvement		☐	☐	☐	☐		☐	☐		☐	☐	☐	☐	62
Working equipment renewal			☐	☐	☐	☐	☐	☐	☐					54
Medical check up		☐	☐	☐	☐	☐	☐	☐	☐					62
Communication Wi-Fi provision	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	100
Amenities improvement	☐	☐			☐	☐				☐	☐			46

Table elaborated by Subhan Usman.

The table shows that all the workers wanted access to Wi-Fi while they were at sea, and a majority wanted improved food, routine medical check ups, and replacement of protective clothing (gloves, workwear, boots). Group interviews with an additional 21 migrant fish workers included discussion of working conditions that they would like to see improved or changed. Their responses also included the need to have access to the Wi-Fi service available on board when at sea. Interviewees explained that ability to communicate with the outside world would give them peace of mind as they can hear from their families, check with their families that their salaries have been received, and address their need for recreational activities. They also highlighted the need to have a doctor and enough medicines in each vessel.

Individual interviews with an additional 15 migrant fish workers suggested that workers were largely unaware of many of the basic rights under international employment standards such as those included in ILO C-188. Thus, they tended to see other aspects of working conditions (such as less than the standard 10 hours rest per day and poor living conditions onboard) as something acceptable or at least something that they had to bear by taking employment as migrant fish workers.

Notes



[i] See <https://bspcertification.org/>.

[ii] See <https://fishstandard.com/>.

[iii] Our sample of crewing agencies is very small when situated in the complex landscape of existing crewing agencies in Indonesia. According to official data of the Ministry of Transport (MoT), as of September 2025, there were 373 crewing agencies with *SIUPPAK* permits. However, the MoT does not distinguish between crewing agencies that recruit for merchant ships and agencies that recruit for fishing vessels. Some agencies recruit workers for both. Moreover, based on official information of the Ministry of Indonesian Migrant Workers Protection/Indonesian Migrant Workers Protection Agency (KP2MI/BP2MI), as of September 2025, they had registered around 400 recruitment agencies with *SIP3M* permits. This total includes all kinds of private recruitment agencies, and it does not indicate neither how many agencies are specific for seafarers nor how many of them are specific for fishing crew members. To know the approximate number of agencies that recruit migrant fish workers is further complicated by the fact that the number of agencies with *SIP2MI* and *SIUP* permits is still unknown.

[iv] The number of crewing agencies that partner with AP2I has gone from 24 in 2023 to 37 in October 2025, according to its website as consulted in both years. We do not have this information for previous years for SPPI, only 2025 data: the number of crewing agencies that partner with SPPI has gone from 35 in March 2025 to 37 in October 2025, according to its website.

[v] Through the National Agency for the Placement and Protection of Migrant Indonesian Workers (BNP2TKI), under the Ministry of Manpower: Regulation PER-12/KA/IV/2013 on the Procedure to recruit, place and protect seafarers in foreign vessels. A central government regulation also requires crewing agencies to have CBAs with unions: Government Regulation No. 22/2022 on the Placement and protection of migrant seafarers in commercial and fishing vessels.

[vi] The determination of wages is made more complicated in that we do not know the flags of the vessels concerned, only the location of the fishing company. In practice, however, our observation is that the CBAs use the fishing company home country wage regulations as a basis.

[vii] Ford et al. (2024) note that the CBA creates a mechanism through which union dues can be directly deducted by the company, and then add that companies can use CBAs to exert control over unions especially where they advance member dues. We do not currently have sufficient information to know if that means it is the crewing agencies that deduct union dues and advance them to the CBA unions, or whether these dues are paid through another mechanism.

[viii] Law No. 21 of 2000 Concerning trade unions/labor unions, and Decree of the Minister of Manpower and Transmigration No. Kep.187/Men/X/2004 Concerning members' contributions of trade unions/labor unions.

[ix] A participant who is in an administrative position with a large union; a key informant; and mentioned in a video posted on social media by an association administrator.

[x] See also Ford et al., 2024, who describe AP2I and SPPI as primarily service organizations.

[xi] The current legal bases for CBAs signed by crewing agencies with *SIUPPAK* licenses are in Ministerial Regulations (from the Ministry of Transport) No.59/2021 on the organization of businesses related to water transportation and No.12/2021 on the standards for businesses activities and products in the organization of risk-based business licensing in the transportation sector. According to the first, the Indonesian seafarer union must be affiliated with an international seafarer union and must be approved by the Director General of Sea Transportation (*Direktur Jenderal Perhubungan Laut*). According to the latter, the Indonesian union might or might not be affiliated with an international union. International networks can be of help in providing support to Indonesian migrant seafarers in fishing outside the country.

[xii] Two training videos uploaded to youtube by a large CBA union are indicative of the nature of training offered by the unions: <https://www.youtube.com/watch?v=rY6bsk5ilPY>; <https://www.youtube.com/watch?v=tFjYyNQJHRg>. (These are public recordings).

[xiii] We did not collect information on international activities and networking during our field research. Information is based on reports by NGOs, the media, and Ford et al., 2024.

[xiv] See <https://thefishingdaily.com/international-fishing-news/historic-coalition-demands-protection-for-indonesian-migrant-fishers/>



[xv] It is possible that some of the workers we interviewed were contracted by crewing agencies with no CBA unions, as some crewing agencies are not registered with the Ministry of Transportation or Ministry of Manpower and do not follow regulations concerning the requirement to have CBAs. However, this is not likely for the majority of participants because: 1) The number of crewing agencies registering with the Ministry of Transportation has increased rapidly; 2) we recruited some of the workers we interviewed through registered crewing agencies, and 3) interviewed workers indicated that they share knowledge about what crewing agencies are not trustworthy, so that they are not likely to enroll with an unregistered agency with a poor reputation.

[xvi] See the recordings of training videos posted to YouTube, following links in endnote xii. The emphasis in these recorded training sessions is on the need to be able to perform difficult work. Limits on what the CBA unions can do for workers is also mentioned in relation to frequency of port visits. Worker rights were not mentioned.

[xvii] In our work in ports where vessels employing Indonesian workers enter (Taiwan, Cape Town, Montevideo), fish workers seeking assistance contacted seafarer centers or chaplains, or port-based worker associations. These in turn contacted the Indonesian Embassy, worker families, the Taiwanese fisheries agency, or direct employers. Other researchers similarly report that workers abroad are likely to go to port-based support organizations, and they do not mention CBA unions. For example, an IOM report (2023) that lists grievance procedures mentions that workers mostly contact their crewing agencies to manage problems and that the result is seldom satisfactory for workers. Workers who could specify a grievance channel also mentioned the Embassy of Indonesia, civil society groups, call centres, a Korea-based fisheries cooperative empowered to facilitate settlement of disputes, and finally what the report called 'worker union/shelters'. These likely refer to port-based seafarer centers. The worker union is left undefined but could refer to the active role of Korean seafarer unions. Stella Maris Taiwan reports that it provided legal assistance for 63 complaints in 2022 (for all migrant fish workers, not just Indonesians), involving unpaid wages, repatriation, or possible forced labour, and that they resolved these through the Fisheries Agency in Taiwan. The report does not mention CBAs and Indonesia-based unions (Stella Maris, 2023). Stella Maris in Taiwan also surveyed 40 migrant workers during 2021-22 regarding their knowledge of their rights, contracts, grievance procedures and so on, this survey did not mention CBAs or Indonesia-based unions. Among our sources, only Ford et al. (2024) mentions that workers went to CBA unions for support in relation to grievances.

[xviii] The appendix provides a summary of what workers reported as their main concerns during our interviews.

[xix] The exception with respect to minimum wages may be Chinese vessels, as we are not aware of a minimum wage or other employment standards for migrant workers on Chinese DWF vessels.

[xx] Some crewing agencies in Indonesia operate with commercial permits (SIUP) issued by the local government (Indonesian Ocean Justice Initiative, 2020, p. 7). CBAs are not required for a SIUP permit. In addition, according to IOJI (2020), some crewing agencies operate with no license at all (p. 7).

[xxi] An interviewee suggested that one way of providing some protection for workers not covered by CBAs is to involve immigration officers prior to departure through pre-emptive actions. Immigration officers could corroborate through the migration IT system that Indonesian workers have all the required documentation properly noted when they swipe their passport. Workers would only be allowed to leave Indonesia if all required documents are in place.

[xxii] The following illustrate the work of associations in providing support to migrant workers: <https://buruhmigran.or.id/2014/04/04/miliki-ktkl-74-abk-masih-jadi-korban-perdagangan-orang/>; <https://sbmi.or.id/sbmi-tegal-tuntut-pt-pacifik-ocean-abadi-kembalikan-dokumen/>; <https://inakor.id/diduga-menjadi-korban-tppo-8-abk-migran-laporkan-pt-kjs-ke-bareskrim-polri>



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