

Report

**FOCUS ON
LABOUR
EXPLOITATION**

Voices from the deck: The workers' rights case for a UK fishing visa

May 2026



Please cite as **Focus on Labour Exploitation (FLEX). 2026. Voices from the deck: The workers' rights case for a UK fishing visa.**

Available at: www.labourexploitation.org

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Acknowledgements:

This report was written by Angeli Romero, and edited by Oliver Fisher, Kate Roberts and Oska Paul. The FLEX research team that worked on this report over the course of design and data collection also included Nora Böggemann.

We are grateful to everyone that made this report possible including all the workers, individuals, and organisations that agreed to share their insight and knowledge for this research project. We would like to extend our sincere thanks to Orley Badilla from Stella Maris Philippines for connecting our team with the workers involved in this study.

We would also like to thank our research consultant Ma. Clarinda A. Gutierrez, based in the Philippines, for her support in coordinating and conducting worker interviews, and contributing valuable local knowledge. Her efforts were essential to the completion of this report.

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Terminology Guide

In this report, we will be using the term “**transit loophole**” to refer to the temporary permission granted to a worker entering the UK to join a UK fishing vessel. This is characterised as a loophole because it utilises a framework intended for short-term shore-to-ship transit to instead facilitate long-term employment by British employers on UK vessels.

There have been different terms used to refer to this permission, depending on the context and the stakeholder:

1. Legal definition: Contract Seaman Leave

Contract Seaman Leave is permission granted to an individual entering the UK to join a vessel or transfer to a departing ship as a crew member. This is based on paragraphs 12–13 of Schedule 2 to the Immigration Act 1971. It is a technical term primarily used to indicate a legal category in immigration practice. This leave is temporary, conditional, and purpose-specific; it only allows for transit from a port of entry to a port of departure and does not grant any permission to work or reside in the UK.

2. Administrative reference: Code 7 Leave

While Contract Seaman Leave is the legal category, Code 7 is the administrative endorsement used by the Home Office to record it. Academics, researchers and third sector advocates occasionally use this term and have previously referred to it as the Code 7 stamp.

3. Common usage: Transit Visa

The term Transit Visa is commonly used by fishing industry practitioners and fishers to refer to the Contract Seaman Leave. Although the term appears in academic research, parliamentary reports and news articles, **it is not an actual visa** and does not grant any formal immigration status to the individual.

Important Distinction: The Contract Seaman Leave should not be confused with the Visitor in Transit visa that applies to individuals who are going through UK border control but leaving the UK within 48 hours.

1. Introduction

Following the publication of *Unravelling the nets* (Focus on Labour Exploitation, 2025c), which analysed seafarer and fishing-related visa and entry clearance policies in the UK and their impact on migrant fishers, this report, *Voices from the deck*, shifts the focus to the lived experiences of the fishers themselves. While the UK fishing industry has become increasingly reliant on migrant labour, the sector's ability to continue to legally recruit migrant fishers in UK waters is now approaching a cliff edge.

Recent policy changes under the 2025 Immigration White Paper have increased Skilled Worker Visa thresholds, further exacerbating what were already significant barriers to entry and rendering the route virtually inaccessible for the fishing industry. While the route currently is technically accessible because certain fishing roles, including deckhands, are listed on the Immigration Salary List (ISL),¹ this window is closing. Employers can only hire workers on the ISL until the end of 2026, which is when the government has said the ISL will be abolished. A new Temporary Shortage List will be introduced; however, eligibility for Regulated Qualifications Framework (RQF) 1–5 roles will be restricted to occupations essential to industrial strategy or critical infrastructure (Migration Advisory Committee, 2025). Unless this situation changes, there will be no formal visa route for roles below RQF Level 6 (degree level) into the fishing sector for work in UK waters. This will almost certainly mean that more workers will be pushed into the insecure transit loophole and/or it may result in labour shortages.

For almost two decades, the UK fishing industry has utilised the transit loophole to staff its fleets (Hansard, 2011; International Transport Workers' Federation, 2022). This system relies on a legal fiction: treating fishers as if they are merely “in transit” through the UK, even though many have been working on British vessels for over ten years. Despite this long-standing service for British employers on UK-flagged vessels, these workers possess no formal immigration status every time they are in the UK, leaving them in a state of permanent precarity. This report argues that such a framework creates structural vulnerability rather than security, locking workers out of access to UK labour rights protections and enforcement mechanisms.

To address these systemic risks, we present the case for a dedicated UK fishing visa which enables migrant fishers to access rights as workers in practice. Drawing from FLEX's Safe Migration Blueprint (Focus on Labour Exploitation, 2025a), this proposal warns against more restrictive immigration controls. It provides an evidence-based recommendation on how the UK, by moving away

¹ The ISL is a UK Government list of occupations where employers only need to pay 80% of the usual minimum rate that applies to qualify for a Skilled Worker visa.

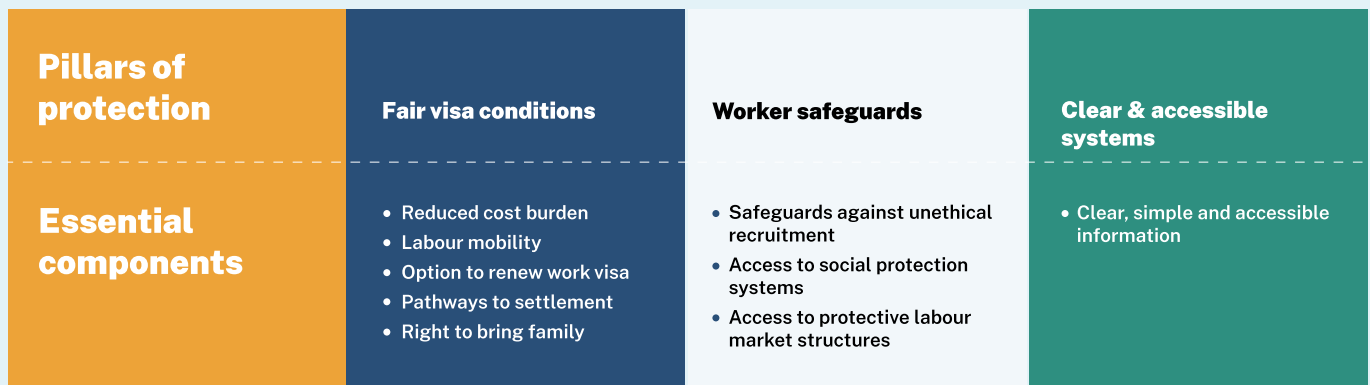
from employer-dependency toward a model of transparency and dignity, can ensure that those who harvest its waters are granted the basic protections they deserve.

Safe Migration Blueprint

FLEX’s Blueprint for safer and fairer migration for low-paid work (Safe Migration Blueprint) considers the essential components necessary for embedding workers’ rights and safe and fair practices into migration into low-paid work (Focus on Labour Exploitation, 2025a). The Safe Migration Blueprint recognises that vulnerability is not intrinsic to migrant workers. However, vulnerability can be created by decision-makers through poorly designed policies, legislation, and business models. Therefore, the host country has a responsibility to develop systems and procedures so that workers can move from one country to another without unreasonable risk of harm and are able to secure fair arrangements, both financially and in terms of personal investment. To achieve this, the Safe Migration Blueprint identifies 3 pillars of protection for safe and fair migration (see figure 1). These pillars of protection consist of essential components that enable migrant workers to:

- Secure fair arrangements
- Effectively handle issues that arise
- Navigate the migration system with confidence

Figure 1. Pillars of protection and essential components for safer and fairer migration for low-paid workers.



2. Methodology

This report employed a qualitative research methodology to examine the complex immigration and labour issues faced by migrant fishers in the UK. This is the second of two FLEX reports focused on the experiences of migrant fishers in the UK. The first report, *Unravelling the nets* (Focus on Labour Exploitation, 2025c) identifies key regulations, requirements, and processes of entry pathways for migrant workers in the fishing industry. This second report covers the working and living experiences of workers.

We conducted 24 semi-structured interviews with Filipino migrant fishers in October 2025 (23 employed via the transit loophole and one that had been on a Skilled Worker visa as well as previously employed via the transit loophole).² A community researcher carried out the interviews with Filipino migrant fishers in their hometowns, using their native language to ensure comfort and authenticity. The interviews specifically focused on recruitment trends and visa application processes (covered in the first report), as well as working and living conditions on fishing vessels and the challenges fishers faced due to their lack of migration status in the UK (covered in this report).

Participants had a mean age of 43.3 years (ranging from 32 to 53 years) and a median age of 45. On average, participants had worked on UK-flagged vessels for 10.5 years. This experience was widely distributed, ranging from fishers going into their first year of deployment to seasoned veterans with up to 19 years of service, as of the interview date. Educational backgrounds varied: half of the participants (n=12) had attended or graduated from high school, while a smaller subset (n=7) reported an elementary-level education. Notably, four participants held higher education qualifications, including degrees in Marine Engineering. While 23 out of 24 participants were contractually employed as deckhands, two of these individuals reported being assigned engine-related responsibilities, describing their roles as “wiper-fisherman” and “wheeler.” The last remaining participant was employed as an engineer. While participants worked across multiple ports, Scotland was the most frequent location (n=20), followed by England (n=11) and Northern Ireland (n=10).³

The focus on the experiences of Filipino fishers is intentional, as they constitute a significant and particularly vulnerable group within the UK’s fishing industry. Reports have highlighted that the UK fishing industry has become increasingly reliant on low-paid foreign labour, with Filipino fishers one of the most prominent nationalities employed as deckhands on UK-flagged vessels (Sparks, 2022; Cundy, 2023; Murphy and Quintana, 2025; Sparks

² Workers’ names in this report have been changed to protect the identities of participants.

³ Some participants had experience working in multiple ports.

and Zhou, 2025). The Institute of the Americas (2023) has noted that the Philippines alone provides almost 30% of all seafarers globally, contextualising their prominence within the UK's migrant fishing workforce. This group is often subject to exploitation through the transit loophole and precarious working conditions, making their experiences central to understanding the systemic issues within the sector (Clements and Whitlock, 2024).

This report builds on the learnings of a Worker-Driven Social Responsibility pilot programme in Scotland that sought to build worker-driven, market-enforced mechanisms and systems to improve working conditions in the UK fishing industry.



3. The case for a dedicated UK fishing visa

For almost two decades, the UK fishing industry has relied on the transit loophole to employ migrant fishers (Hansard, 2011; International Transport Workers' Federation, 2022). This reliance in recent years, can be viewed, in part, as a direct consequence of the difficulty in accessing Skilled Worker visas for fishers (Focus on Labour Exploitation, 2025c). While the transit framework was designed for temporary maritime passage for crew members of ships and vessels in transit in UK waters, it is now the primary mechanism for staffing UK fishing fleets (Sparks, 2022), creating a system that facilitates structural vulnerability. Because this framework operates outside of UK employment laws, migrant fishers working aboard UK-flagged fishing vessels do not have access to the fundamental protections afforded to the rest of the domestic workforce.

This section presents the case for a dedicated UK fishing visa which ensures holders are recognised as UK workers with opportunities to access rights in practice, as a necessary transition from a model of employer-dependency toward one of transparency and dignity. By establishing a visa route that is genuinely accessible and recognises migrant fishers as UK workers, the UK can mitigate systemic risks of exploitation, overfatigue, and unethical practices that currently undermine the industry's integrity.

Reasons for a UK fishing visa

1. To recognise migrant fishers as UK workers
2. To protect worker health
3. To provide protections from workplace accidents
4. To ensure fair pay
5. To break the cycle of employer dependency
6. To provide legal clarity and transparency
7. To provide job and contractual security
8. To provide access to protective labour market structures

Common sponsorship visa for work in UK fishing

The risks inherent in tying a worker's legal status to a single employer are well-documented across the UK labour market. In the social care sector, the trade union Unison has campaigned for a "certificate of common sponsorship" to address the severe exploitation resulting from workers' total dependency on individual employers (Horwood, 2025; Focus on Labour Exploitation, 2025b). Unlike traditional "closed" sponsorship, which traps a worker's immigration status to a single employer, a sector-wide approach allows workers to be sponsored by an independent industry body.

Applying this model to the fishing industry would mean replacing the current "vessel-specific" transit permission with a portable, sector-wide status. Under this framework, a migrant fisher would no longer be legally tethered to a single boat or skipper, but would instead hold a status granting them the practical and legal mobility to switch vessels and employers within the sector. This empowers workers to leave bad employers and take their skills to reputable ones without the threat of deportation.

How this section is structured

To ensure clarity for all stakeholders, the reasons for a dedicated UK fishing visa are structured as follows:

- **Risk Analysis:** An analysis of the specific conditions and risks arising from the long-standing transit loophole, identified through worker testimony.
- **Voices from the Deck:** Qualitative evidence and interview quotes from fishers, providing a direct account of the impact of current policies and practice.
- **How a safe and fair fishing visa could protect workers:** Recommendations based on the Safe Migration Blueprint, identifying the rights and protections that must be made available to fishers.

While this analysis highlights critical areas of concern shared by workers, it is not an exhaustive list of all necessary mitigations. The risks in this sector are multi-layered, stemming from an intersection of country-of-origin statutory requirements, UK immigration loopholes, and a lack of clarity regarding which labour market protections apply to workers. Consequently, while a dedicated fishing visa alone cannot resolve every issue, it serves as the essential foundation. It would establish the formal legal status required to bring these workers under the protection of UK law, enabling authorities to bridge the enforcement gap and address the broader spectrum of risks.

Reason 1 for a UK fishing visa: To recognise migrant fishers as UK Workers

Risk Analysis

Within the transit loophole framework, migrant fishers are legally treated as if they are merely passing through the UK, yet, for many, the reality of their labour proves that they are, in fact, working in the UK. The framework thus operates as a loophole that benefits industry by providing cheap access to labour while exploiting the system to undercut migrant fishers of labour protections, including rightful compensation.

The transit loophole operates on the premise that fishers do not work within 12 nautical miles of the UK coastline, but in reality, workers reliant on this framework report being required to perform extensive labour within UK waters and at UK ports. Fishers report shore-side work such as unloading up to 1,000 boxes weighing 40 kilograms each, cleaning the boat, repairing nets, painting, resupplying, and other boat maintenance jobs. These tasks may not be considered “work” by employers as they do not constitute active fishing; however, they are demanded during periods when the crew is not “at sea” – their supposed rest time – effectively rendering this labour both invisible and unpaid.

Many migrant fishers are dedicated labourers who have worked for British employers on UK-flagged fishing vessels for many years, yet their immigration status means that much of their labour is not recognised as work. They remain excluded from domestic employment protections and are at significant risk of removal from the UK if they are found to be working within UK territory.

Voices from the Deck

“At the dock, we still have work to do... Drain the fish, clean the boat, repair the nets, clean the storage, fetch water, pick up groceries and supplies.”

Gabriel, Filipino fisher (3 years in the UK)

“[On dock] we unload the fish then. That’s 40 kilos per box. Our boat is quite large, so that would be around 1,000 boxes. That’s a full landing. There’s no rest at all during a full landing. The boat I boarded [name redacted], everyone knows the work there is unlimited. Even if we’re ashore, there’s still plenty of work to do.”

Ricardo, Filipino fisher (12 years in the UK)

“When we dock, we do the painting. But there are some captains, who, when we are on the dry dock, take pity on us and don’t give us work to do and just let us rest in the flat. [They hire] a contractor at the shipyard... most of the time, they assign it to the Filipinos, especially when it’s a full-Filipino crew.”

Buboy, Filipino fisher (19 years in the UK)

“We are out at sea for 10 days before we dock, then we go back to sea immediately. After we do the landing, we set sail right away. Just enough time to load the food consumption supplies. Actually just a few hours. After we load the oil, food, we leave right away. On our way to the harbour, we’re already doing some cleaning, repairing the nets. After we do that, the only thing left to clean at the harbour is the fish room. The fish storage. That’s what we clean last. Before we pull out the catch and haul in the empty boxes... But it also depends, because there are boats that pay stevedores at the harbour. The Filipinos on those boats are lucky because they can hire people at the harbour to unload it for them.”

Nonoy, Filipino fisher (17 years in the UK)

How a safe and fair fishing visa could help protect workers

A dedicated fishing visa that recognises migrant fishers as UK workers will provide the necessary legal standing to ensure workers are granted full UK employment rights and will result in:

- Ending the legal fiction of transitory status by giving workers documented status in the UK, and thus creating a legal basis from which all activities, including essential non-fishing and maintenance tasks, can be measured as work and compensated accordingly.
- Easier access to union membership and support.
- Proper compensation for the physical toll of week-long stretches at sea, where work is described as “unlimited.”
- Ensuring that all migrant fishers on UK-flagged vessels fall under the jurisdiction of the Fair Work Agency and wider UK Labour Market Enforcement structures to enforce minimum working and living rights.

Reason 2 for a UK fishing visa: To protect worker health

Risk Analysis

The nature of fishing is inherently demanding, requiring fishers to adapt not only to the tidal and weather changes that seasons bring, but also to their impact on catch. Within the transit loophole framework, these seasonal demands generate systemic risk of over-fatigue due to continuous work and a lack of proper rest periods. During seasons of abundant catch, fishers report working non-stop and without sleep for as long as 60 hours. Without access to labour market enforcement protections, migrant fishers are pressured to endure over-fatigue and sleeplessness. Extreme fatigue can have long-term health impacts and lead to chronic illness, joblessness, and life-changing accidents.

Outside of high seasons, interviewees reported a normal work schedule with duty hours of “6 on, 6 off,” in theory, giving them 12 hours of rest per working day. However, the quality of rest is questionable, as it is compromised by the reality of living on a boat 24/7 for 8 to 10 months at a time, even though fishing vessels are not designed for full-time habitation. In this environment, the distinction between off-duty and work is barely distinguishable, as fishers are confined in their workplace where they are expected to perform tasks at any moment simply because they are there. While the UK has ratified the International Labour Organisation’s (ILO) Work in Fishing Convention (ILO C188), which sets out minimum working and living rights for fishers, implementation through domestic regulations and enforcement in the UK faces serious limitations (Sparks and Zhou, 2025).

Voices from the Deck

“Our duty hours are 6 on, 6 off... because within 12 hours, you work 6 hours on deck, and you sleep 6 hours. [There is no fixed time when we wake up and sleep,] it depends, because there are times they wake you up, then that is the start of your duty.”

Vic, Filipino fisher (10 years in the UK)

“If I didn’t get sick in Scotland, I would have stayed longer because the captain was kind. It was the work that took a toll on my body, because aside from fishing, I had to mend the nets, and work down in the storage, and it’s cold there. And, the weather was hot, then cold. [...] I had an extended hospital stay here [in the Philippines]. I think it was due to over-fatigue. I was jobless for a year.”

Romy, Filipino fisher (9 years in the UK)

“It depends on the catch [...] Sometimes, ma’am, we go without sleep for 36 hours. Sometimes, we rest for 1 hour [during that time]. Especially when it’s the season for prawns.”

Nonoy, Filipino fisher (17 years in the UK)

“Our employer changed the terms of the contract because our work schedule there was not the same, the work was unlimited. There’s no time to rest. The others you interviewed had a weekend off? In our case, we didn’t have a weekend at all. Even if we’re in the harbour, we were still working.”

Ricardo, Filipino fisher (12 years in the UK)

“There’s even times we go without sleep for 60 hours. Almost 4 days. It depends on the catch. If there’s plenty, the work lasts longer. And then, you go on duty at the wheelhouse [to] keep watch. Because when we do towing, the skipper takes a rest then. Normally, in 24 hours, we do hauling 4 times, ma’am. We usually sleep during that time, for example, we throw the net at 6 in the morning, [sleep], we do hauling at 11, because that’s supposed to be every 5 hours. And after that, we sort the fish, which takes another 2 hours. While we’re sorting the fish, we throw the nets again. That’s another 5 hours [before hauling]. The work is non-stop. While we’re on operations, we’re always hauling the nets until our vessel is filled with fish. That’s why we’re usually at sea for 8 days. [When we dock at the harbour,] it’s just a matter of hours, ma’am. Just enough time to unload the fish. Sometimes we stay in the harbour for one night, but most of the time, we immediately go back to sea.”

Buboy, Filipino fisher (19 years in the UK)

How a safe and fair fishing visa could help protect workers

A dedicated fishing visa that recognises migrant fishers as UK workers will provide the necessary legal standing to ensure workers are granted full UK employment rights and will result in:

- Ensuring that all migrant fishers on UK-flagged vessels fall under the jurisdiction of the Fair Work Agency and wider UK Labour Market Enforcement structures to enforce minimum rest periods under the Fishing Vessels (Working Time: Sea-fishermen) Regulations 2004.
- Average pay for the total hours worked not falling below the national living/minimum wage.
- Providing workers with a route to redress, granting them the necessary legal standing to report underpayment to labour market enforcement bodies.

Reason 3 for a UK fishing visa: To provide protections from workplace accidents

Risk Analysis

Migrant fishers working on UK-flagged vessels under the transit loophole lack formal domestic legal status because they are considered technically “outside” the UK for immigration purposes. Consequently, their ability to access and pursue occupational redress is severely restricted. Furthermore, while migrant workers have a right to access primary healthcare in the UK, irrespective of their immigration status, this is rarely realised in practice. Access is hindered by their lack of immigration status and the fear that seeking medical attention may alert authorities to potential breaches of immigration rules or result in being charged for treatment. Limited access to healthcare in practice places limitations on workers’ recovery post illness or injury.

Furthermore, migrant fishers who suffer life-altering injuries are physically unable to pursue indemnity or disability claims because they are repatriated when they are no longer able to carry out their duties under the Fisherman’s Work Agreement or cannot be expected to carry them out in the specific circumstances (Maritime & Coastguard Agency, 2023, para. 3.1.4). Mandatory repatriation physically removes the fisher from the jurisdiction where they could most effectively pursue indemnity claims. The result is a vacuum where injured fishers are left to navigate complex, slow-moving insurance systems from their home countries without adequate support. Consequently, compensation claims and payouts are often significantly delayed, negligible, or entirely non-existent. This lack of accountability creates a cycle where fishers, driven by financial desperation and the failure of the claims process, feel compelled to return to the same hazardous working conditions despite their permanent disabilities.

Voices from the Deck

“I had an accident, ma’am, I lost a finger in 2020 in the UK. It got caught in the machine. The company paid for all the expenses. I was hospitalised for a while. The accident happened in September, and it was operated on twice, because it got infected the first time. They had to amputate it again in December... I was supposed to [receive insurance compensation] here in the Philippines, but I didn’t accept their offer. The grading was low. It was Grade 13, and it was only worth PhP 1,000 plus [£13+]. My friend said, “Let’s wait, they might offer more.” I tried to wait, but it took too long, and I needed the money, that’s why I decided to go back to work there [in the UK]... I came home in January 2021, I went back onboard January 2022. I was jobless for a year. After I lost my finger, I went back to [work in] Scotland.”

Arturo, Filipino fisher (18 years in the UK)

“My hand got stuck, it was cut off. I filed an insurance claim [in Northern Ireland], but it’s taking too long. I got off the boat, I told the captain I’ll stop working. It was [name of charity redacted], in Northern Ireland, that advised me...The attorney is taking too long to get back. We used to chat [on messenger] often, but it’s been 3 years since I’ve heard from him. I don’t know. He said I might not be able to claim my insurance, not to hope anymore. I didn’t file for insurance here in the Philippines. It was [name of charity redacted] that informed me.”

Pedro, Filipino fisher (14 years in the UK)

How a safe and fair fishing visa could help protect workers

A dedicated fishing visa that recognises migrant fishers as UK workers will provide the necessary legal standing to ensure workers are protected when serious accidents occur and would result in:

- Workers gaining access to vital safety nets – such as workers’ compensation – so that they do not fall through the cracks and face dire financial consequences if injured.
- Workers being able to access the healthcare they need without having to leave the UK or go into debt.

Reason 4 for a UK fishing visa: To ensure fair pay

Risk Analysis

The transit loophole enables a discriminatory tiered remuneration structure within the UK fishing industry where workers are paid different rates depending on their immigration status. Additionally, there are also reports of workers on the same immigration status being paid different rates depending on their nationality.⁴ This results in migrant workers being paid less than their UK counterparts for the same – and often more – labour (see table 1 below). Because workers employed via the transit loophole are not recognised as UK workers, they are excluded from National Minimum Wage protections. Furthermore, interview participants report that monthly salaries have remained stagnant for at least 10 years, failing to account for inflation or the rising cost of living.⁵

Table 1. Monthly salaries of workers based on role, visa type, and nationality

Role	Nationality	Entry Permission	Monthly Salary (USD)	Monthly Salary (GBP)
Deckhand	Filipino	Transit Loophole	1,450*	1,145.50**
Deckhand	Ghanaian, Indian, Sri Lankan	Transit Loophole	N/A	1,300***
Deckhand	Filipino	Skilled Worker visa	N/A	2,800*
Skipper/Crew	British	N/A	N/A	Share of the catch

Notes: N/A = Not Applicable.

* The 1,450 USD rate was confirmed by ten (10) separate worker interviews; the 2,800 GBP rate was confirmed by the single interviewee in the study who was on a Skilled Worker visa. These figures were further verified the International Transport Workers' Federation (ITF).

** Calculation is based on an exchange rate of 1 USD = 0.79 GBP.

*** Confirmed by ITF through email correspondence as an average rate as there is no set level of pay.

Filipino, Ghanaian, Indian and Sri Lankan workers are reported to be confined to flat monthly salaries, while British crew members operate on a percentage sharing scheme, allowing them to benefit from abundant catches. The research data further highlights another inequity: Two Filipino deckhands employed via the transit loophole who hold university degrees in Marine Engineering are given additional engineering duties. Despite this, they receive no corresponding pay increase, earning roughly half the salary of a deckhand on a Skilled Worker

4 Based on information gathered from worker interviews and International Transport Workers' Federation (ITF) correspondence.

5 Confirmed by ITF through email correspondence.

visa.⁶ This disparity underscores how visa status, rather than skill level or technical responsibility, dictates wage rates in the current system.

To visualise the wage gap, we compare Filipino migrant fisher rates against the UK National Living Wage (NLW) that was in place when workers were interviewed for this study (£12.21 per hour).⁷ While the inherent nature of the fishing industry precludes a standardised work week due to external variables, such as quota restrictions, vessel maintenance, or extreme weather, operational periods are characterised by exceptionally long hours. In the absence of such disruptions, a work week consisting of 60 to 72 hours represents a realistic reflection of an average across the year.⁸ For the purpose of a comprehensive comparative analysis, this report also includes a 37.5-hour work week scenario to demonstrate the pay disparity against a standard UK full-time baseline. Consequently, these figures serve as the framework for the following wage analysis and National Living Wage comparisons (table 2).⁹

Table 2. Hourly wage rates and comparison to NLW for Filipino deckhands on the transit loophole and Skilled Worker Visa by different working hour scenarios

	Transit loophole	Skilled Worker visa
Monthly Pay (GBP)*	£1,145.50	£2,800
Scenario A: 72 hour working week		
Hourly Rate**	£3.67	£8.97
Difference per hour to NLW ***	- £8.54	- £3.24
Scenario B: 60 hour working week		
Hourly Rate	£4.40	£10.77
Difference per hour to NLW	- £7.81	- £1.44
Scenario C: 37.5 hour working week		
Hourly Rate	£7.07	£17.28
Difference per hour to NLW	- £5.14	+ £5.07

Notes:

* The 1,145.50 GBP rate was confirmed by ten (10) separate worker interviews; the 2,800 GBP rate was confirmed by the single interviewee in the study who was on a Skilled Worker visa. These figures were further verified by the International Transport Workers' Federation (ITF).

** Calculations assume an average of 4.33 weeks per month.

*** NLW refers to National Living Wage; Based on an NLW rate of £12.21 per hour.

6 Based on information gathered from worker interviews and ITF correspondence.

7 This rate was in effect between 1 April 2025 and 30 March 2026.

8 Based on information gathered from worker interviews and ITF correspondence.

9 Workers employed on the Skilled worker visa can work overtime hours. However, their average pay for their total hours must not fall below the national minimum wage. For the purpose of table 2, we have included figures based on a worker's reported experience of being paid a flat rate no matter how many hours they worked.

As illustrated in Scenario A, a Filipino deckhand employed via the transit loophole earns an hourly rate of only £3.67. This figure is based on a “6 on, 6 off” fishing schedule, which equates to a 72-hour work week (six days of 12-hour shifts). This wage represents a 70% reduction on the UK NLW.

Under Scenario B, a Filipino deckhand employed via the transit loophole earns an hourly rate of only £4.40. This figure is based on a “6 on, 6 off” fishing schedule, which equates to a 60-hour work week (five days of 12-hour shifts). This wage is still 64% less than the UK NLW.

Under Scenario C, even when calculated against a standard 37.5-hour work week – a baseline that does not reflect the reality of the long hours in the fishing industry – a Filipino deckhand employed via the transit loophole would still only earn £7.07 per hour. This figure remains significantly below the UK NLW of £12.21 per hour.

These scenarios highlight that the transit loophole facilitates wage theft by entrenching a flat-rate salary that does not adjust for the rigorous nature of fishing work. Regardless of number of hours worked, the pay remains fixed at 1,450 USD for Filipino deckhands, meaning that as their exhaustion and occupational danger increase, the relative value of their labour actually decreases. This is further compounded by the lack of mandatory recording of rest or working hours. Consequently, while workers should theoretically be entitled to overtime pay, they receive none.¹⁰ By treating additional hours as effectively “free labour,” the current system incentivises overwork as a standard business practice. This drives down industry standards and creates a distorted market, making it nearly impossible for responsible employers who wish to pay fair wages to remain competitive against those exploiting the loophole.

Voices from the Deck

“The salary never increased in the UK. It’s remained that way since 2010. Unlike when I was in the Netherlands in 2019, I was earning 1,955 Euros. I heard it’s up to 2,900 Euros now. The Netherlands has a good policy, ma’am, because your salary is equal to the Europeans. The only difference when you work in the UK is when you work for a generous owner because you receive bonuses when you go home. In the Netherlands, while your salary is fixed, at least you’re assured of a big pay. In the UK, if you end up with a bad boss, you won’t get any bonuses... I don’t know why the salary in the UK hasn’t increased since 2010. Of course, you can’t help but compare it to the other fishing industries in Europe, like the Netherlands.”

Nonoy, Filipino fisher (17 years in the UK)

¹⁰ Confirmed by ITF through email correspondence.

“[The captain and the other Scottish crew member] they’re on percentage sharing, not monthly. The Filipinos are not part of the sharing. We are on monthly salary.”

Pedro, Filipino fisher (13 years in the UK)

“Now that I am on a Skilled Worker visa, there’s no more bonus, just my salary. It’s okay, ma’am, because my salary is higher now at 2,800 GBP, ma’am. When I was on a transit visa, my salary was at 1,450 USD.”

Vic, Filipino fisher (10 years in the UK)

How a safe and fair fishing visa could help protect workers

A dedicated fishing visa that recognises migrant fishers as UK workers will provide a clear legal mandate for UK labour market enforcement authorities to verify that work hours and payments across the fleet meet industry standards and statutory UK labour laws. This will ensure:

- All crew members receive the UK statutory rate for wages.
- The rate of pay is based on role and experience, with no discrimination based on nationality.

The case of Philippine manning agencies and their role in the UK fishing labour regime

Within the transit loophole framework, manning agencies serve as the key facilitators in the employment of Filipino fishers within the UK fishing industry. While the creation of a specific UK fishing visas may not directly resolve reported unethical recruitment practices occurring overseas, the conduct of these agencies represents a critical point of vulnerability in the labour chain that demands urgent attention and further investigation.

By carrying out everything from recruitment, contract and visa processing to the receipt of overseas earnings and payment of wages into Philippine bank accounts,¹¹ these agencies exercise a high level of control over a fisher's livelihood. This structure creates a significant power imbalance, as workers become entirely dependent on manning agencies that hold the power to delay contract renewals, visa applications, and salary payments, or manipulate foreign exchange rates to their own advantage (Human Rights at Sea, 2018).

One interviewee described how one of the manning agencies they previously used would withhold 200 USD of a fisher's salary. This "deposit" was only returnable if the fisher reported to their office within 72 hours of returning to the Philippines. Failure to do so meant the agency kept the deposit. Interviews revealed that many fishers who used the same manning agency flew directly to airports closer to their hometowns rather than to Manila where the agency was based, making it physically impossible for them to present themselves at the agency within the 3-day window. Further, many workers reported losing deposits when the Philippine Government revoked the agency's license due to alleged licence infringement activities (Human Rights at Sea, 2018).

Voices from the Deck

“[Regarding the salary], I have an issue with the rate. The dollar [exchange] rates are not consistent. [...] When [agency redacted] was new, ma’am, it was really good [...] if the ship gives PHP 55 [to 1 USD], they also give PHP 55 [to 1 USD]. Since someone else is now in charge, the Treasurer [of the manning agency], the one who collects the allotment? They have changed it. For example, if the ship gives PHP 55 [to 1 USD], they will only give PHP 53 [to 1 USD].”

Buboy, Filipino fisher (19 years in the UK)

¹¹ Philippine law mandates that fishers remit at least 80% of their basic monthly salary to a designated beneficiary via an authorised Philippine bank. Notably, the law does not require these remittances to be facilitated through a manning agency. In practice, however, manning agencies act as intermediaries to simplify administration and satisfy the 'joint liability' requirements of the Philippine recruitment system.

Reason 5 for a UK fishing visa: To break the cycle of employer dependency

Risk Analysis

The transit loophole framework creates a state of extreme employer dependency, where migrant fishers are inextricably linked to and can be punished for the actions of the vessel owner or skipper. This creates a systemic risk where migrant fishers are criminalised and penalised for the operational decisions of their skippers and employers. Under the transit loophole, fishers are tied to specific vessels and strict geographical boundaries, yet they possess no control over where the boat sails or which vessel they are told to board. Because of this dependency, when a skipper chooses to fish (or even mistakenly fishes) within the restricted 12-nautical-mile limit or transfers a crew member to an unauthorised vessel to meet the company's needs, it is the fisher who faces the immediate and life-altering consequences of immigration enforcement.

The consequences of being held liable for operational decisions out of their control extend beyond the termination of a work contract; it often leads to confiscation of travel documents, removal from the UK, and the threat of long-term entry ban. While the vessel may be blacklisted and the skipper fined, the fisher bears the weight of the penalty: as well as the immediate loss of their job and salary, they may have a permanent stain on their immigration record that jeopardises their ability to support their families through future overseas work.

Voices from the Deck

“We actually got caught, mam. Because he [the skipper] fished under 12 miles... he got caught. We’re just thankful to the UK Border [Force] for not banning us. We were given a chance. But, we weren’t able to go back on that boat because it was blacklisted... [We were] questioned on the boat... We were [sent home] after 10 days because our captain requested it, since he couldn’t hire new crew members right there and then... Thankfully, my 10 months [contract] was about to end. But I had a colleague who was there for just 1 month.”

Mark, Filipino Fisher (19 years in the UK)

“The boat [named] on our [entry documents] visa was different from the one we actually boarded... We really wanted to disembark because we knew that wasn’t allowed, but our captain didn’t seem to be aware of it. He said they already processed our visa with the UK Border at the airport... We were even made to board it immediately [upon arrival in the UK]. We were really surprised [when it happened]. We were working on the shore then. We were surprised when the police and UK Border [Force] came running and boarded the boat together. So, myself and two other colleagues

started hiding, the 3 of us. Our captain, since he lived nearby, came and asked why we were hiding. We were hiding because we knew we were supposed to be on a different vessel. He said we won't be taken because there's a document that proved we were already transferred to another boat. But if there really was a document, our passport would have shown the name of the boat we were being transferred to. But there wasn't. So, we got caught... We were given our ticket home, but it took a week. We had to wait for a week. Our skipper even asked us to come back to work. But how could we when our documents were confiscated?"

Jose, Filipino fisher (11 years in the UK)

"I was caught twice for that [12-nautical-mile] violation, ma'am. I just worked for 21 days [out of a 10-month contract], ma'am. After that, I was jobless for 6 months. And when I went back [to the UK], it lasted for just 4 months, because the vessel I was on was caught for fishing below 12 miles. We were investigated by the UK Border [Force] again, so we were sent home. I stayed for 4 months only that time... I really begged them that time [not to be banned from entering the UK for 10 years]. We were interviewed by the UK Border [Force] then, ma'am. I even showed them a document [written by a support organisation explaining the circumstance of the case]. I pleaded my case and told them I was the family breadwinner, and it wasn't my fault, ma'am. The UK Border must have taken pity on me. Now, this is what we show when we process our visa. It's like a supporting document."

Buboy, Filipino fisher (19 years in the UK)

How a safe and fair fishing visa could help protect workers

A dedicated fishing visa that recognises migrant fishers as UK workers and provides labour mobility will help prevent workers from being unfairly double-punished for the actions of their employers. The visa should include access to safeguards, such as non-cancellation clauses, to ensure that fishing visas are not cancelled due to the blacklisting of an employer. It should be based on a model that reduces employer dependency, such as a sector-wide sponsorship model (see box on page 6). The UK should also introduce a bridging visa that allows migrant workers to stay in the UK for a period of time between visa applications to enable them to raise complaints. If these measures are enacted, it would result in:

- Workers being able to search for a new employer without fear of removal from the UK.
- The Fair Work Agency, and other UK Labour Market Enforcement structures, being able to significantly increase their reach and effectiveness, ensuring that all workers on UK-flagged vessels can safely report labour abuses, supporting access to justice and accountability.

Fisher Profile: Buboy

Education: High School graduate

Languages: Bisaya, Tagalog, and basic English

First Entry to UK: 2008

Locations Worked: Scotland, England, Northern Ireland

“I was caught twice for that [12-nautical-mile] violation, ma’am. I just worked for 21 days [out of a 10-month contract], ma’am. After that, I was jobless for 6 months. And when I went back [to the UK], it lasted for just 4 months, because the vessel I was on was caught for fishing below 12 miles. We were investigated by the UK Border [Force] again, so we were sent home. I stayed for 4 months only that time... I really begged them that time [not to be banned from entering the UK for 10 years]. We were interviewed by the UK Border [Force] then, ma’am... I pleaded my case and told them I was the family breadwinner, and it wasn’t my fault, ma’am. The UK Border must have taken pity on me.”

The case of Buboy, a Filipino fisher with 19 years of experience in the UK, illustrates how the current fishing immigration framework creates a systemic risk where migrant fishers are criminalised and penalised for employer-led deviations. Fishers like Buboy are likely to follow orders because they trust their employers to be the experts who know and follow the rules. When a skipper or employer claims that papers are “in order,” the fisher is unlikely to possess either the authority nor the legal knowledge to challenge that assertion.

Buboy’s case also highlights a system that is not merely difficult to navigate but actively creates worker vulnerability. **While Buboy believed his removals from the UK were due to 12-nautical-mile violations, records indicate his removals actually stemmed from other technical visa breaches:** (1) fishing in UK waters on a Schengen visa and (2) working on a vessel not named on his Joining Ship visa. This discrepancy highlights that Buboy did not fully comprehend the legal basis of his removals.

The system places the migrant fisher at significant risk by holding them accountable for navigating an unreasonably opaque system that is difficult for even a native English speaker to understand, let alone a migrant worker for whom English is not a first language. Ultimately, the current framework is heavily stacked against the worker; while the employer dictates the operational conditions, the fisher is the one who bears the life-altering consequences of non-compliance.

Reason 6 for a UK fishing visa: To provide legal clarity and transparency

Risk Analysis

The transit loophole framework creates a system that is not only difficult to manage but actively produces worker vulnerability. It is a complex system, effectively operating as a “non-route” for migrant fishers without any accessible guidance or information regarding their immigration status, labour rights, or protections available to them – or, more accurately, the lack thereof. When the system fails to provide clear, official guidance, workers are forced to find it elsewhere, often leading to misinformation.

The level of misinformation is evidenced by the experience of the fishers themselves, who are frequently forced to rely on inconsistent explanations from manning agencies or peers, leading to misunderstandings of their immigration status. Some of the fishers interviewed were under the impression that they must “hide inside the boat” if the UK Border Force monitors the harbour, while others believed they could leave the port and “roam” free as long as they “watch out” for authorities. Others only learn the actual conditions of their status when they are caught and questioned by officials. Moreover, workers often remain unaware of their basic working conditions, such as hours, rest days, salary arrangements or even the nature of their accommodation, until they arrive in the UK and start working on the vessel.

The lack of reliable, accessible information, compounded by linguistic, legal, social and cultural barriers, leaves workers trapped in a state of legal and practical uncertainty. This makes it extremely difficult for fishers to question or challenge poor or exploitative working conditions, as they lack the clarity and security needed to assert their rights.

Voices from the Deck

“The manning agency explained that the transit visa is valid for 3 months. If it expires, you have to obtain a new one. [When you have a 10-month contract,] you have to watch out for the UK Border [Force], you shouldn’t roam around [...] There are times we have to stay on the harbour for a month. We’re not supposed to be allowed to stay there long since we’re just on transit visa. We can [roam around], you just have to watch out for the UK Border [Force]. If they do monitor, you just have to hide inside the boat.”

Mark, Filipino fisher (19 years in the UK)

“At first, no one explained [the transit visa and attached conditions], ma’am. We found out about the transit visa there [in the UK], that you shouldn’t stay in one place. The UK Border [Force] explained it when I was caught. They explained that as a seafarer, for example, I was staying in Aberdeen. We shouldn’t stay long there. We should set sail.”

Buboy, Filipino fisher (19 years in the UK)



Interviewer: Do you already have an idea about your work hours? How many days?

Eduardo: Not yet.

Interviewer: So, you also don't know your rest days?

Eduardo: Not yet.

Interviewer: Ok. Are there arrangements for your salary, bank account?

Eduardo: Not yet, ma'am.

Interviewer: You also don't know who you'll be working with there? Whether there will be other Filipinos?

Eduardo: Not yet.

Interviewer: Do you know whether you have a room, shower, food?

Eduardo: Not yet.

Interviewer: What about whether you'll have a day off, if you'll be allowed to get off the boat?

Eduardo: Not yet.”

Eduardo, Filipino fisher (leaving for the UK in 7 days to work as a fisher for the first time)

How a safe and fair fishing visa could help protect workers

A dedicated fishing visa that is fit-for-purpose, simple and transparent would provide the necessary legal basis for the production and dissemination of clear and reliable information throughout every stage of the labour migration process. This will enable workers to:

- Make informed decisions regarding their decision to migrate, and to plan accordingly for the future.
- Seek appropriate assistance and assert their legal protections, preventing them from being trapped in exploitation.

Reason 7 for a UK fishing visa: To provide job and contractual security

Risk Analysis

Reliance on the transit loophole system enforces a cycle of long-term job insecurity. Under this system, fishers are kept in a state of permanent probation where contract renewals are dependent on the skipper's discretion. Even those who have worked on the same vessel for several years have no right to renewal. This creates an environment where workers feel forced to overlook questionable operational decisions, safety concerns, or exploitative work conditions to ensure they stay in the good books of a skipper and secure another contract.

Within the transit loophole system, fishers are contracted to work for 8 to 10 months, after which they are sent home for 2-3 months while the crew is rotated. While migrant fishers welcome this time to reunite with their families, it is also a period of precarious waiting. During this period, the employer can choose not to renew their contract or sell the fishing vessel. If the vessel is sold, the migrant fisher is left with no recourse; because the transit documents are tied to a named vessel, they do not have the ability to even return to the UK to seek alternative work. This creates a reality where years of service can be wiped out overnight. They are also left without any of the redundancy protections afforded to workers with the right to work in the UK.

Under current UK employment law, employees gain the right to claim unfair dismissal after two years of continuous service – a milestone many migrant fishers have surpassed without gaining any equivalent security. Legislative changes introduced via the Employment Rights Act 2025 will make protection against unfair dismissal a right after 6 months of being in a job, and the limit on the compensatory award for unfair dismissal will be removed.¹²

Voices from the Deck



Interviewer: Sir, for that 5-year period with the same owner, why did you keep going back there?

Lito: I don't know. Maybe he liked me... Because if they don't like you, they wouldn't call you back."

Lito, Filipino fisher (9 years in the UK)

“In my experience, our skipper will decide [to renew the contract]. If the skipper is impressed with you, you will be asked to go back. He will tell the [vessel] owner there, and the owner will tell the agency.”

Vic, Filipino fisher (10 years in the UK)

¹² These changes will come into effect on 1 January 2027.

“I’ve been going back around 8 times. But the only problem is, I always end up having no work for 3 months at a time. Like now, I already have my visa, but I can’t leave because our vessel is being sold.”

Romy, Filipino fisher (8 years in the UK)

“There is one company I would have liked to work for again... The captain was supposed to ask me to come back, ma’am, but I was slandered by a fellow crew member. He was insecure about the work. He didn’t want others to be better than him. He sucked up to the captain, made up stories about me.”

Buboy, Filipino fisher (19 years in the UK)

“I wasn’t able to finish my first contract. We were sort of the back-up. The existing crew were on vacation then. When they came back, we were made to go home. The [manning] agency was angry at that time. I don’t know if they got paid, because we were supposed to be on full contract. It wasn’t a valid reason for us to be sent home. [We were contracted for] 8 to 10 months. I only worked for 4 months.”

Manuel, Filipino fisher (12 years in the UK)

How a safe and fair fishing visa could help protect workers

A dedicated fishing visa that recognises migrant fishers as UK workers will provide the legal standing necessary to access fundamental labour rights. This should include a pathway to settlement that is a maximum of 5 years and that includes the time spent on other visas in the qualifying period for settlement. It should also be renewable in the UK, with consideration given to the length of the initial visa and renewal periods, so that these do not result in high levels of administration, cost, and uncertainty for workers. This would ensure that their employment is governed by statutory protections rather than employer discretion, allowing them benefit from:

- Redundancy protections in the UK, including statutory redundancy pay, notice periods, fair selection processes and consultation rights.
- Statutory protections against unfair dismissal after a qualifying period of service.

Reason 8 for a UK fishing visa: To provide access to protective labour market structures

Risk Analysis

The transit loophole maintains a legal fiction that migrant fishers are merely transiting through rather than working in the UK. This lack of formal status means that immigration enforcement is prioritised over labour market enforcement, effectively excluding them from safeguards that protect the rest of the UK workforce. This leaves them in a state of limbo, where their rights are unenforceable and their safety is left to chance.

Interviews with Filipino fishers revealed a lack of clarity regarding where to turn for help. Without access to official UK labour market enforcement authorities, workers rely on a small number of charities and informal contacts. While charities provide vital support, they are not a government enforcement body with the power to sanction exploitative employers.

Some workers interviewed arrived in the UK without knowledge of any local help resources, while others were mistakenly informed that they should seek help from the “UK Embassy,” an institution that does not exist within the country. Many workers opt to report directly to their captain. However, this creates an inherent risk; if the captain is the perpetrator of abuse or exploitation, the worker is left with no safe reporting pathway.

Voices from the Deck

“If you are in a dangerous situation, you should report it to Filipinos who live there, ma’am. Those who have been there for a long time. Because they will know where to go.”

Vic, Filipino fisher (10 years in the UK)

“[If something happens, I will go to] the UK Embassy for help. I learned this during the pre-departure orientation seminar I attended before leaving for the UK. It depends how critical it is, if it’s a matter of life and death, then I will ask for help.”

Gabriel, Filipino fisher (3 years in the UK)

“In our case, if we have a problem there [in the UK], we go to our captain. He’s the captain-owner so we won’t have a hard time talking to him. But if something like that [something untoward] does happen, it would actually be difficult for us to go anywhere, because we’re always at sea.”

Joseph, Filipino fisher (19 years in the UK)

How a safe and fair fishing visa could help protect workers

A dedicated fishing visa that recognises migrant fishers as UK workers will provide the necessary legal standing to ensure workers are granted full UK employment rights and will result in:

- Ending the legal fiction of transitory status by giving workers legal, documented status in the UK.
- Ensuring that all migrant fishers on UK-flagged vessels fall under the jurisdiction of the Fair Work Agency and wider UK Labour Market Enforcement structures to enforce their rights and provide a grievance mechanism.
- Easier access to union membership and support.

All in a day's work

Life as a fisher in the high seas is defined by a relentless cycle of labour, unpredictable elements, and profound isolation. For the Filipino fishers working in the UK's fishing industry, these challenges are compounded by extreme differences in climate compared to back home, and long distances from their loved ones for months at a time. The following quotes offer a raw glimpse into their daily lives. These are the voices of men who endure the turbulent waters of the British winter, driven by a singular purpose: providing for the families they left behind.

Voices from the Deck

“The weather alone, it was so cold. The climate wasn't the same as in the Philippines, which is warm. The cold there [in the UK] is something else. It took me a month to recover. We're always wet, especially during bad weather. You have to put up with it because you're looking for work. It's hard when you don't have money.”

Pedro, Filipino fisher (13 years in the UK)

“When there are huge waves... We hold on tight to whatever we could. Yes, it is scary, but you just get used to it.”

Bong, Filipino fisher (9 years in the UK)

“... The foreign crew said they admired me because even when I was vomiting all over the place, I still did my work.”

Jojo, Filipino fisher (3 years in the UK)

“We almost drowned. It was bad weather. The window of the wheelhouse broke. The climate is really different in the UK. Every week, it's bad weather. Especially now, when it's near winter.”

Joseph, Filipino fisher (19 years in the UK)

“It is inevitable that you will be stressed when you get there. When you first arrive, you won't be able to sleep. Because I already experienced that. But I just kept thinking about my family. That's why I just worked hard there, because you never know if you'll be sent home immediately. Just do your job well.”

Vic, Filipino fisher (10 years in the UK)

“We usually throw the net at 5 in the morning, then hauling at around 10 or 11 am. And then, we go back to throwing the net, and the catch we hauled earlier, we work on it, sort them, put them inside the storage. And, after 2 hours, 3 hours, we take a rest for 1 hour, 2 hours, wake up again and throw the net. That's our work routine. 2 hauls in the day, 2 hauls in the evening. We could sleep in the day for a total of about 4 hours, 5 hours. The same at night. But

there are times when there's plenty of catch. When there's plenty of catch, our work is non-stop."

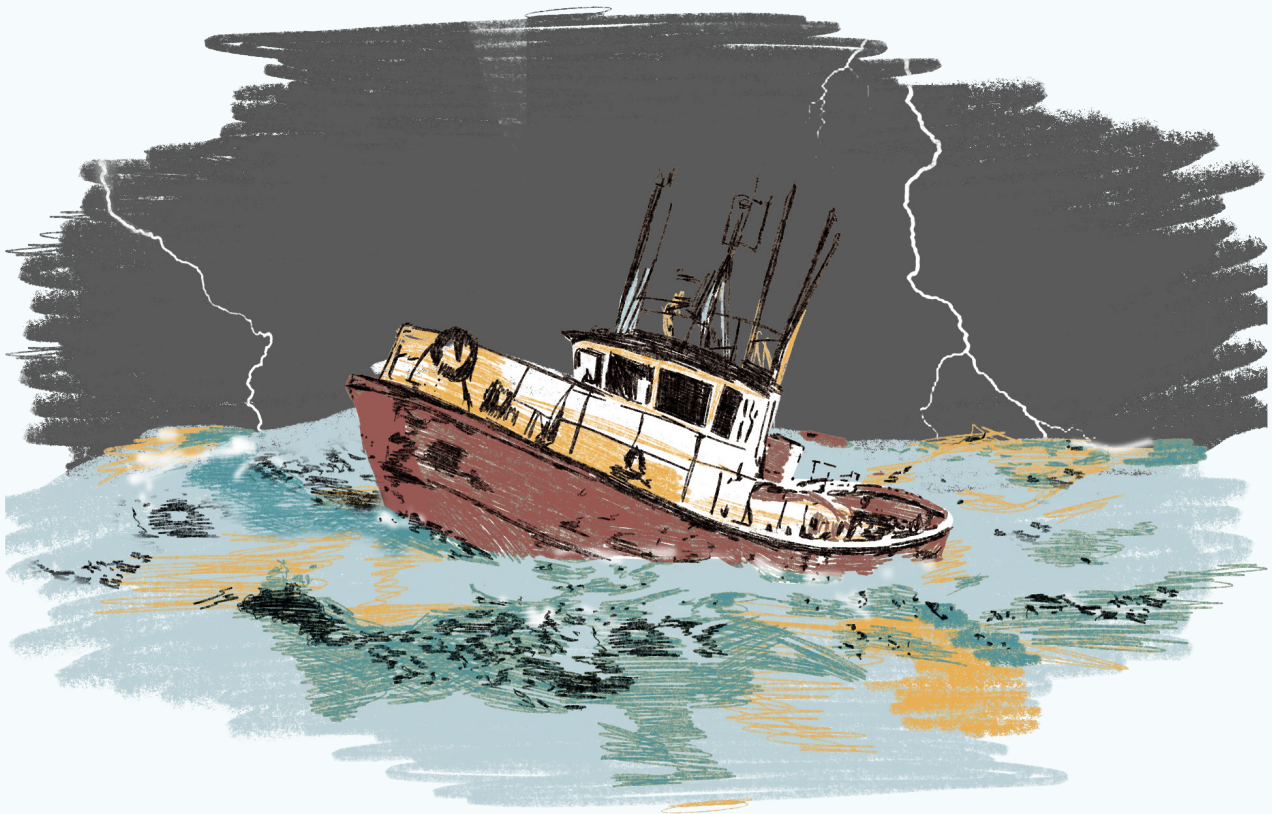
Manuel, Filipino fisher (12 years in the UK)

"We caught prawns there; the work was more complicated. We had to peel them. While we're doing that, we had to throw the net back into the sea, so the work is endless. By the time we're done [peeling], it's already time to pull the net back in again, so we get buried in work. It just keeps piling up, even more and more. That's why there are times when we go two days without sleep. [If we get some sleep,] it is more or less half an hour. We just rest for a bit, eat, then go back to work."

Arturo, Filipino fisher (18 years in the UK)

"... On Saturday-Sunday, the British [crew members] go home. We set sail again on Monday morning. They can't stand to be away from their family. They even admire us Filipinos, because we can endure being away from our family for 1 year. They would say, 'I'll go crazy.'"

Jojo, Filipino fisher (3 years in the UK)



4. Conclusion

For nearly two decades, the UK fishing industry has relied on the transit loophole to employ the migrant labour necessary to sustain its operations. The voices of the fishers captured in this report expose a reality that contradicts the “transit” status assigned to them. Far from just passing through, these migrant workers have become integral to the UK’s fishing industry, frequently working for British employers on UK-flagged vessels for ten years or more without ever gaining formal immigration status or labour protections. This system creates a legal paradox where workers are physically present and labouring in the UK, but are considered outside the country for immigration purposes.

The conditions described in these interviews – the relentless hauling cycle, the physical toll of 60-hour shifts, and the lack of real rest on turbulent seas – underscore the gruelling nature of this work. Yet, beyond the physical demands, the report exposes a systemic vulnerability rooted in a dependency on manning agencies and employers, a lack of labour protections in practice, and a tiered pay structure that ignores the reality of their long hours. These experiences must be the primary consideration when designing the specific requirements and conditions of a dedicated UK fishing visa.

The UK fishing industry is now approaching a cliff edge. With the December 2026 abolition of the Immigration Salary List, there will be no formal work visa pathway for the UK to recruit migrant fishers other than the Skilled Worker route which will require at least degree level of skills and a high level of English language. Unless a fit-for-purpose visa route is established, the industry will be pushed further into the shadows of the transit loophole, exacerbating the risks of labour abuse. Central to its design must be a model, such as a sector-wide sponsorship model, that reduces employer dependency by granting workers the necessary right to switch within the sector and seek safer, fairer working conditions without jeopardising their immigration status.

Recommendations

To address the issues detailed in this report, and to make entry routes into the UK fishing industry safer and fairer for migrant fishers, the following recommendations should be considered:

- 1.** Establish a Fishing Worker Visa. This would formally recognise fishers as workers and help end the misuse and overreliance on a route that puts workers at high risk of labour exploitation. It is important that any new visa must contain options (such as switching employers, and opportunity to renew the visa) to ensure all workers on the visa can access rights in practice and challenge exploitation. This is key to the

government's commitment to make work pay for all workers and ensure the provisions in the government's flagship Employment Rights Bill apply to all workers.

- 2.** Alongside creating a Fishing Worker Visa, introduce a bridging visa similar to Australia's "Workplace Justice visa" that enables migrant fishers with restricted immigration status who have been exploited to take claims against employers without losing their immigration status or permission to work.
- 3.** Conduct a formal review of the use of the transit loophole which includes the collection and publication of statistics on the use of this leave.
- 4.** Ensure labour market enforcement in UK fishing and that labour market enforcement is applied on all UK-flagged vessels.
- 5.** Ensure that the Fair Work Agency is accessible to migrant fishers in practice and provided with robust enforcement powers which enable them to protect and support fishers.

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