

The Rt Hon Shabana Mahmood MP  
Home Secretary  
2 Marsham Street  
London

Copy to:  
Parliamentary Under-Secretary of State in  
the Department for Business and Trade

CEO, Fair Work Agency

23 July 2026

Dear Home Secretary,

### **Exploitation of migrant fishers in the UK fishing industry**

Congratulations on your reappointment. As you continue in this role, we write to highlight the urgent need to address the situation of migrant fishers working on UK flagged vessels.

In November 2024, [we wrote a letter to your office](#) to raise concerns about the serious human rights abuses experienced by many migrant workers in the UK fishing industry as a result of systemic weaknesses in immigration policy. The conditions that enable these abuses — including human trafficking and modern slavery, inhuman and degrading treatment, and other forms of severe labour exploitation to continue — must be addressed as a matter of urgency.

We urge you, as Home Secretary, to work with your colleagues, copied to this letter, to develop a coordinated cross-government approach to immigration and labour market enforcement for migrant fishers. Such an approach is essential to address the systemic conditions that create serious risks of exploitation for migrant fishers working on UK-flagged vessels. In this letter, we set out our recommendations and welcome the opportunity to support the Government in taking this work forward.

Systemic weaknesses in the UK's immigration system, labour market enforcement and the regulation of the fishing industry have created the conditions in which the exploitation of migrant fishers flourish. In particular, the Government's failure to end the misuse of the Code 7 Contract Seafarer Stamp (the "Transit Loophole") denies migrant fishers employment rights and labour protections afforded to other workers in the UK. This has created downward pressure on wages and working conditions, undermining the government's attempt to attract a sustainable domestic fishing workforce.

The situation is set to deteriorate further at the end of the year. The planned abolition of the Immigration Salary List will effectively close access to the Skilled Worker visa route for fishing occupations – a safeguard secured following sustained advocacy with the Home Office in 2022–23. Since there is no alternative immigration pathway for the recruitment of migrant fishers, even responsible employers will become reliant on the Transit Loophole to meet labour shortages, placing more people in a system that makes them vulnerable to exploitation.

There could not be a clearer warning that the UK must treat these issues with the seriousness and urgency they deserve. The Immigration and Asylum Bill as well as the recent establishment of the Fair Work Agency presents an important opportunity to establish a fair, lawful and sustainable immigration route for the fishing industry which protects migrant fishers' labour rights. This must include a review of the continued misuse of the Transit Loophole.

The UK Government can no longer maintain that the fishing industry should build a sustainable domestic workforce while simultaneously permitting the industry to depend on underpaid and exploited migrant workers. Establishing a legitimate immigration route for UK-flagged vessels to recruit migrant fishers with full protection under UK employment law would help prevent abuse and create a level playing field for all workers.

A sector-wide sponsorship model would enable migrant fishers to move between employers within the fishing industry, allowing them to leave abusive or substandard working environments. This model would also reduce the administrative burden placed on individual vessel owners under the current employer-sponsored system, particularly for smaller operators. In doing so, it would support a sustainable and thriving fishing industry in which decent working conditions are the norm for **all** fishers.

### **The following reforms are essential to improving labour standards and protecting workers' rights across the UK fishing industry:**

- 1. Introduce a dedicated Fishing Worker Visa for migrant fishers employed on UK-flagged vessels.** The route should be based on a model of sector-wide sponsorship; recognise migrant fishers as workers entitled to the full protection of UK employment law; permit them to change employer where necessary; provide access to labour market enforcement and employment tribunals; and offer an appropriate pathway for renewal where there is an ongoing labour market need.
- 2. Conduct an urgent review of the use of the Transit Loophole** to recruit migrant fishers to work on UK-flagged fishing vessels. The review should also assess the impact that the abolition of the Immigration Salary List in December 2026 and the anticipated exclusion of fishing occupations from the Temporary Shortage List will have on the recruitment and working conditions of migrant fishers on UK-flagged vessels.
- 3. Collect and publish data** on the use of the Transit Loophole for migrant fishers working on UK-flagged fishing vessels operating exclusively outside UK territorial waters.

- 4. Establish a cross-government advisory group**, working in partnership with civil society organisations, trade unions and industry representatives, to address the risks of exploitation faced by migrant fishers.
- 5. Provide clear guidance and enforcement powers** regarding International Labour Organization (ILO) Conventions 188 (the Work in Fishing Convention) and 190 (the Violence and Harassment Convention) in the UK fishing sector.
- 6. Ensure effective labour market enforcement** across the UK fishing industry by applying the National Minimum Wage Act 1998 and the Fishing Vessels (Working Time: Sea-Fishermen) Regulations 2004 (which have been amended to bring them fully into line with ILO C 188) to all workers on UK-flagged vessels.
- 7. Ensure necessary powers, resources and strategies** are provided so that enforcement bodies can uphold workers' rights.
- 8. Ensure that the Fair Work Agency is accessible to migrant fishers in practice** and is equipped with robust enforcement powers to protect workers and secure effective remedies. The FWA's approach should be underpinned by the principles of protected reporting, evidence-based enforcement, compliance with international labour standards, safe reporting, fair and timely remediation, gender sensitivity, and meaningful worker participation.
- 9. Review the regulation and licensing of recruitment agencies** recruiting migrant fishers for work in the UK, in line with the recently adopted ILO Guidelines on Fair Recruitment in the Fishing Sector, on which the UK Government played a leading role as Vice-Chair.
- 10. Introduce a Workplace Justice Visa**, drawing on the Australian model, to enable migrant fishers who have experienced exploitation to remain lawfully in the UK while pursuing employment claims or cooperating with labour market enforcement and criminal investigations.

Yours Sincerely,

**Focus on Labour Exploitation (FLEX)**

**International Transport Workers' Federation (ITF) Fisheries Section**

**Nautilus International**

**Stella Maris**

**The Seafarers' Charity**

**Ethical Trading Initiative (ETI)**