



To: Secretary of State Pascual Ignacio Navarro Rios
Secretary of State for the European Union,
Ministry of Foreign Affairs, European Union and Cooperation
Plaza del Marqués de Salamanca, 8. 28006 Madrid

CC: Minister Luis Planas Puchades, Minister for Agriculture, Fisheries and Food,
Minister Héctor Gómez Hernández, Minister for Industry, Trade and Tourism,
His Excellency Deputy Ambassador Raúl Fuentes Milani, Spanish Deputy Permanent Representative to
the European Union

RE: Urgent request for the prioritisation of EU Regulation to combat forced labour

Dear Secretary of State Pascual Ignacio Navarro Rios,

Europêche and the Environmental Justice Foundation, having the joint objective of securing sustainable and human rights abuse free fisheries, call on the Spanish Government to:

1. Prioritise negotiations on the Forced Labour Regulation (FLR)¹ during your upcoming Presidency of the EU Council.
2. Ensure Member States can establish a common position on the file before the end of the year.

By the International Labour Organization's (ILO) latest estimates, 28 million people globally are trapped in forced labour², which is roughly equivalent to 60% of the current population of Spain. Fishing has turned into a global industry which employs a high number of migrant workers vulnerable to forced labour³. At sea, these offences can thrive out of sight from authorities and are often associated with illegal fishing or human trafficking⁴.

Legislation is key to ensuring EU consumers and businesses do not take part and help prevent the exploitation of human rights. It is therefore concerning that progress on the FLR in the Council of the EU has been limited. Not prioritising this file now could result in legislation being stalled for months, leaving the door open for horrendous abuses to continue.

Through this Regulation, the EU has an opportunity to signal to the world that human rights are not up for negotiation. During its Presidency, Spain could help end this cruel practice, by prioritising and supporting a strong FLR. Conversely, if this legislation fails to be adopted, there is a real risk that the EU

¹ [2022/0269\(COD\)](#) - Regulation on prohibiting products made with forced labour on the Union market

² International Labour Organization (2022). Global Estimates of Modern Slavery: Forced Labour and Forced Marriage. https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---ipec/documents/publication/wcms_854733.pdf

³ ILO Report. Forced Labour and Trafficking in Fisheries. https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_214472.pdf

⁴ EJF Report. Blood and Water. <https://ejfoundation.org/reports/blood-and-water-human-rights-abuse-in-the-global-seafood-industry> (p.10)


will become a 'soft-touch' dumping ground for products tainted by forced labour, as other national regulatory regimes come into force. This outcome would only benefit unscrupulous operators and autocratic regimes where state-imposed forced labour would be given the green light by the European Union.

Furthermore, this Regulation is urgently required to ensure EU businesses are not out-competed by non-EU competitors who can undercut their margins by engaging in labour exploitation and modern slavery practices. The Regulation would ensure that products from operators that are profiting from human suffering no longer have a market in the EU. We know first-hand that there is an urgent need for this Regulation to level the playing field and protect EU fisheries sector jobs. This has been repeatedly requested by the large and small-scale fleet represented by Européche (trawlers, purse-seiners, long liners, gillnetters), as part of its strong commitment with the social dimension of the Common Fisheries Policy. Similarly, the Long Distance Advisory Council, an EU fisheries stakeholder body, expressed support for this Regulation in their [letter](#) in May 2023 to the European Commission, as did the EU Social Partners in the sea fisheries sector in a [resolution](#) in January 2023.

We strongly believe that fighting the structures which allow forced labour to thrive is something that should unite us all, regardless of economic motivation or political persuasion. We hope that you agree and will urgently prioritise this work in the Council under your Presidency to ensure that a common position can be reached before the end of 2023.

We would welcome the opportunity to discuss this with you further and remain at your disposal should you require any further information.

Yours sincerely,
The undersigned



Javier Garat,
President of Européche



Steve Trent,
Founder / CEO,
Environmental Justice Foundation