



On the Amendment of the Fisheries Act with the Principles of Sustainable Development, Human Rights, and Responsible Fishing

Network of Human Rights and Environmental Organisations in Thailand  
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**Subject:** Amendment of the Fisheries Royal Ordinance B.E. 2558 B.E. ...  
**To:** President of the Senate and members of the Senate

The Fisheries Act B.E. 2558 represents a cornerstone of Thailand’s commitment to sustainable marine resource management, the eradication of illegal, unreported, and unregulated (IUU) fishing, and the promotion of ethical labour standards within the fishing industry. Since its enactment, the Act has served as a vital framework, driving alignment with international obligations and fostering significant improvements in marine conservation and human rights practices.

We, the undersigned organisations, acknowledge the ongoing dialogue surrounding the proposed amendments to the Fisheries Act B.E. 2558. However, the current draft, approved by the House of Representatives, raises concerns regarding its potential implications for Thailand's commitments to environmental stewardship and social justice. Specific provisions appear to introduce risks of reversing the progress achieved under the existing framework. These include the removal of critical measures safeguarding workers' rights, which risks exposing vulnerable populations, particularly in seafood processing, to exploitative practices. Also, allowing purse seines with meshes smaller than 2.5 centimetres to fish at night using lights, which have been banned for over 40 years because they catch fish of economic value and have not yet grown to a large size that could cause the extinction of valuable fish or severely destroy aquatic species, affecting the balance of the ecological chain. Besides, proposed changes to penalties and the conditions for confiscating vessels and equipment involved in serious violations may weaken enforcement mechanisms and undermine deterrence.

The proposed amendments to these critical provisions risk undermining Thailand's longstanding commitment to safeguarding marine ecosystems, promoting sustainable fisheries, and upholding human rights. These principles are fundamental to ensuring a harmonious balance between the conservation of natural resources and the pursuit of sustainable economic development, values that should remain central to Thailand's policy framework.

The undersigned organisations respectfully urge the President of the Senate and all members of the Senate to give due consideration to the following recommendations:

1. Retain the existing provisions under Article 69, maintaining the prohibition on purse seines with mesh sizes smaller than 2.5 centimetres during nighttime fishing.
2. Retain Articles 10/1, 11, and 11/1 to ensure the protection of labour rights, especially child and migrant workers, within the fishing industry and seafood supply chain.
3. Retain the original provision of Article 85/1 on at-sea trans-shipment in the Fisheries Act B.E. 2558, which stipulates that only registered vessels designated for aquatic animal transport at-sea may be utilised for such purposes, ensuring regulatory clarity and compliance.

4. Incorporate representatives from artisanal fisheries, labour organisations, and marine conservation groups into the Senate Drafting Committee to review the draft amendments, ensuring diverse and informed perspectives totalling 3 persons.
5. Establishing the Senate Drafting Committee should include appointing Committee Advisors with expertise in fisheries science, marine conservation, and labour rights to ensure a comprehensive and academically informed review of the proposed amendments.

In light of the above, we, the undersigned organisations, respectfully submit these recommendations for your esteemed consideration.

1. Save Andaman Foundation
2. Sustainable Development Foundation
3. Environmental Justice Foundation (EJF)
4. Migrant Working Group of Thailand
5. Greenpeace
6. NGO Coordinating Committee on Development (NGO-COD)
7. Thai Sea Watch Association
8. Federation of Thai Fisherfolk Association (FTFA)
9. Satun Provincial Health Insurance Coordination Centre
10. Satun Provincial Development Plan Monitoring Network
11. Khao To Krang Conservation Group
12. Satun Provincial Consumer Association
13. Southern Fishermen Women Association
14. Satun Provincial Fishermen Women Group
15. Mekong Butterfly Freedom Group
16. Community Resource Centre Foundation
17. Local Community Development Institute
18. Environmental Protection and Natural Resources Conservation Private Organisations  
Assembly
19. Krabi Sea Lovers Association

20. Andaman Sea Lovers Network Association
21. Khao Pilai Ruam Jai Fishermen Group
22. Phang Nga Island Panyi Fishermen Group
23. Ao Phang Nga Local Fishermen Association
24. Ao Bang Tao Local Fishermen and Tourism
25. Baan Phu Khao Thong Seafood Processing Professional Group
26. Pak Nam Local Fishermen Association
27. Trang Provincial Local Fishermen Association
28. Pak Phayun Lake Conservation Fishermen Association
29. Association of Watershed Conservationists, Phatthalung Province
30. Association of Central Lake Conservationists, Phatthalung Province
31. Andaman Sea Resources Restoration Organisation (ARR)
32. Phang Nga Bay Coastal Community Network
33. Phuket Coastal Community Network
34. Eastern Eastern Coastal Network of 5 Provinces
35. Northern Development Foundation
36. Northern People's Foundation of the North
37. Northeast Natural Resources and Environment Network
38. Nakhon Ratchasima People's Empowerment Center
39. Northeast Community Foundation
40. Northeast Mekong River Protection People's Network
41. Lower Chi River Basin Community Resource Management Rights Protection Center
42. Had Yao Fishery Group, Ban Chao Mai
43. Ban Chao Mai Community Enterprise Group
44. Had Yao Fishery Women's Development Group
45. Ban Ta Sae Seafood Processing Group
46. Thung Krabue Community Enterprise Group for Development
47. Ban Ta Sae Community Mangrove Forest Conservation Group
48. Thai Climate Justice for All
49. Environmental and Social Foundation

50. The Mekong Butterfly
51. Assoc. Prof. Dr. Renu Wecharatphimon (Former Vice President of Silpakorn University)
52. Mrs. Kannika Banteingchit (Independent Scholar)
53. Ban Tha Kraeng Marine and Coastal Resources Volunteer Group
54. Ban Tha Kraeng Local Fishery Group
55. Ban Tha Kraeng Aquatic Animal Processing Group
56. Bird Conservation Society of Thailand
57. Green World Foundation