

A close-up photograph of a person's hand holding a small, silvery fish. The hand is dark-skinned and the fish is held gently between the palm and fingers. The background is a blurred natural setting with autumn leaves.

# SEAFOOD SUSTAINABILITY, STABILITY & SECURITY

JUNE 2020

How the sustainability of fisheries management impacts the stability and security of countries, and what we must do about it





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**Cover photo:**  
A hand holds a fish above a layer of dying Mangrove leaves in Palma, Mozambique.  
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Offloading freshly caught fish, Ghana  
© Kyle LaFerriere / WWF-US

CONTENTS

EXECUTIVE SUMMARY	5
BACKGROUND	9
SUSTAINABILITY, STABILITY & SECURITY	15
RECOMMENDATIONS	27

**Today, one out of six of the fish on our plates has been caught illegally, sometimes in ways that support criminal networks. This creates unfair competition for legal fishers and threatens our ocean’s health, including its rich biodiversity and its seafood productivity. How does this happen and what is the impact of such activities on sustainability, stability and security?**



A high-angle photograph of a small, traditional blue wooden fishing boat on a deep blue sea. A fisherman in a white shirt is visible at the stern, steering the boat. The boat has a small cabin structure and a mast with a net or line hanging from it. The water is textured with small waves. A black rectangular box with white text is overlaid on the right side of the image.

## EXECUTIVE SUMMARY

Fisherman leaving the harbour Sicily, Italy.  
© Michèle Dépraz / WWF



# EXECUTIVE SUMMARY

Climate change leads to environmental, social and economic instabilities that can build into various forms of insecurity and conflict worldwide — in this way, climate change acts as a threat multiplier. This report examines these issues within the context of sustainable fisheries and shows why it is crucial to rethink policies at national, European and international levels to account for the drastic consequences of environmental issues on national security and stability.

The marine environment has already started to transform with seas warming and becoming more acidic, which increasingly changes the distribution and migratory patterns of various species. The impact on growth and mortality is multiplied for those species that are already subject to overfishing or whose habitats have been damaged, or even destroyed. Given these extreme pressures on marine life and against the backdrop of increasing competition for limited and fluctuating resources, illegal, unreported and unregulated (IUU) fishing emerges as one of the main threats to the sustainable exploitation of fish populations.

Several billion people depend on fishing, either as a food resource or as a source of income.<sup>1</sup> The fight against IUU fishing activities must consider the instability climate change brings to our ocean and any ensuing security implications as people who have relied on fisheries for their livelihoods are forced to seek other opportunities. Importing States must ensure that unsustainable products do not enter their markets — this action is critical to combatting factors which cause instability across the seafood value chain and bring risks to populations dependent on fisheries while, simultaneously, supporting long-term sustainable fisheries management and resilient ocean ecosystems.

Unsustainable fisheries are often rooted in the uncontrolled and secret access of foreign fishing fleets to the waters of countries that are less capable of managing these crises, as well as in a lack of political interest to ensure good ocean governance. Developed and European States are responsible for controlling their vessels' activities, however, these controls are often highly sporadic, with weak sanctions in place for vessels and nationals who break the rules. When fisheries management and control measures are not applied equally for all, it is unjust to the fishing operators who abide by the rules, as unscrupulous operators gain unfair advantages.

Further, those responsible for illegal fishing activities often hide behind front companies to avoid the risk of conviction. When this happens, investigations become more complex and require international cooperation. Unless we target the heart of these criminal networks, it will not be possible to stop IUU activities, including the human rights abuses and modern slavery that sometimes occur on board. Strong enforcement of existing legislation and of fisheries control mechanisms will establish a level playing field for those fishing operators who follow the rules and help bring an end to IUU fishing.

Despite measures laid out in European Union (EU) legislation, including the Common Fisheries Policy (CFP) and the IUU Regulation, today, one out of six fish on our plates is a result of illegal fishing.<sup>2</sup> The same processes that allow these products to enter the EU market feed the threats of instability to communities who rely on fisheries while increasing the risks of insecurity, as conflicts between multiple countries to access increasingly limited resources grow. Everyone involved must take responsibility.

<sup>1</sup> Agnew DJ, Pearce J, Pramod G, Peatman T, Watson R, et al. (2009) Estimating the Worldwide Extent of Illegal Fishing. PLoS ONE 4(2): e4570. doi:10.1371/journal.pone.0004570.

<sup>2</sup> EU publication (2018), *Facts and figures on the common fisheries policy, Basic statistical data: 2018 edition*.



**Implementation of effective policies to protect our ocean and the communities who rely on its resources is long overdue. WWF calls on EU decision makers, the seafood industry and citizens to take action to secure a sustainable and transparent seafood supply chain.**

**As fish is a renewable natural resource that belongs to all of us before it is caught, transparency about how it is managed is critical to achieving a Sustainable Blue Economy. Decision makers must:**

- Amend the European fisheries Control Regulation to create more dissuasive sanctions, introduce electronic monitoring of vessels, and guarantee better traceability of the seafood products we consume.
- Amend the Regulation on the Common Organisation of the Markets of Fishery and Aquaculture Products so consumers can make informed seafood purchases.
- Guarantee that seafood products available on the European market are ethical and fair, particularly when they are produced under partnership agreements with countries outside the EU.
- Ensure that government support is only given to sustainable activities, shifting the focus from food production to the environmental benefits that contribute to an urgent ecological transition.
- Engage, at the Member State level, in inter-agency cooperation, as any illegal fishing operation goes beyond the fishing sector and is linked to other criminal activity, including tax fraud.
- Embrace combating IUU fishing as a priority and take a leading role at the global level to bring it to an end.

**Accountability goes beyond decision makers and legislation. Via due diligence measures, industry must:**

- Ensure sure that their supply chains are fully traceable, free from illegal fishing and production linked with human trafficking and slavery.
- Take responsibility for the recovery and conservation of marine wildlife by ending the sale of all endangered and overfished species, while being aware that eco-label certification is not always a sufficient remedy to this issue.

**Finally, you, the consumer, have a stake in this fight too:**

- Eat less and better seafood.
- Ask where your fish comes from and how it was caught. Beginning this dialogue is a critical step for all stakeholders along the supply chain to find solutions to the issues and, ultimately, to deliver answers we can all stand behind.





**BACKGROUND**

WWF works with long-line tuna fishers in Bali, Indonesia to encourage the use of more selective fishing gear, such as these circle hooks. More sustainable fishing practices secure long-term business for the endangered tuna industry in this region.  
© Jürgen Freund / WWF



# BACKGROUND



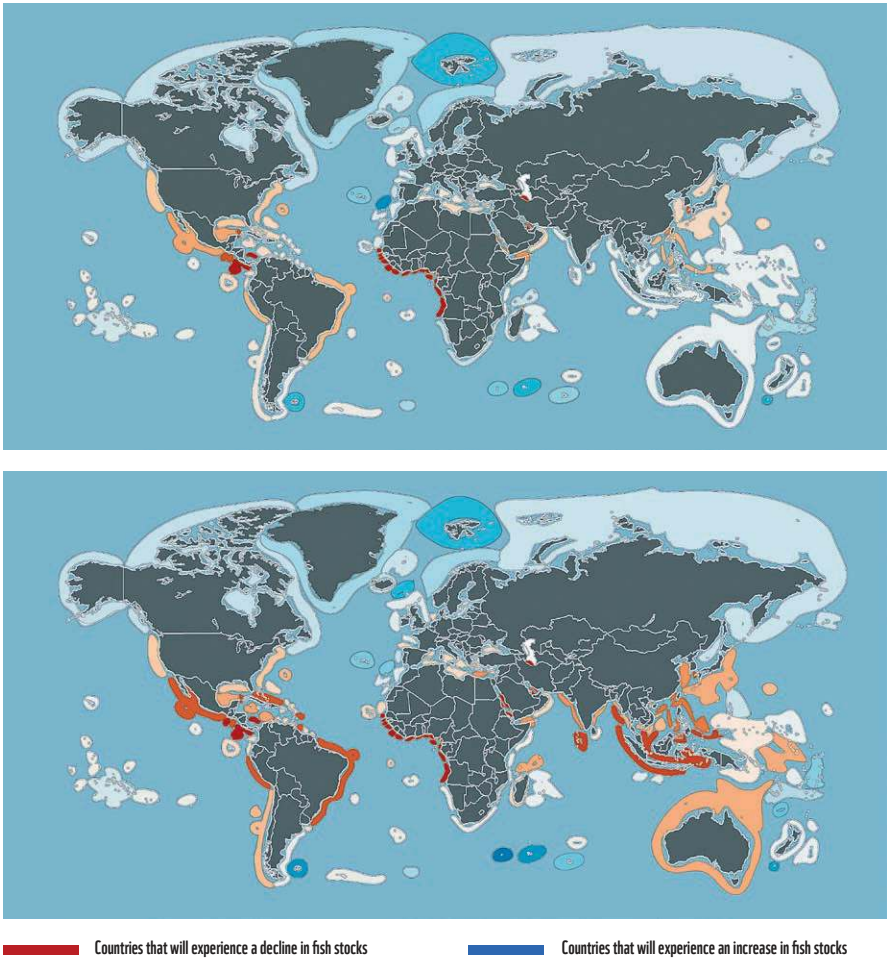
In 2017, WWF-France launched the report “Sustainability, Stability, Security” (3S), which makes the link between security, geopolitical stability and climate change clear. Drawing on the conclusions of a number of scientific studies and the findings of many researchers and institutes specialising in climate safety, the report demonstrates that environmental upheavals have destabilised regions in the past and will continue to weaken parts of the world in the future.<sup>1</sup>

The present report builds upon these previous findings to further show that the environmental, social and economic instabilities brought about by climate change will eventually generate insecurity – both in terms of food security and potentially increased violence in societies. It cannot be denied that climate change thus acts as a “threat multiplier”.<sup>2</sup> The 3S approach represents a new analytical framework which explores a modern vision of security issues that takes the cascading effects of climate change into account. This methodology allows WWF to propose innovative and concrete actions to address and mitigate the impacts of unsustainable fisheries in the face of a changing climate.

The present report adopts the 3S approach to look at environmental and security issues with a focus on the fishing sector. This sectoral-level approach allows for an in-depth understanding of multiple ocean issues that already affect security and peace, such as international competition for access to living and non-living marine resources. Fisheries provide

1 WWF France (2017), *Sustainability, Stability, Security, Why it is vital for global security and stability to tackle climate change and invest in sustainability*, available at : <https://wwf.panda.org/?316560/sustainability-security-stability>  
2 *Ibid.*

Figure 1 – Changes in global distribution and productivity of fish stocks under different climate scenarios through 2100.



Source: High Level Panel for a Sustainable Blue Economy (2019), *The Expected Impacts of Climate Change on the Ocean Economy*.

key resources to billions of people in terms of food and economic security.<sup>3</sup> If this relationship with our ocean breaks down due to the climate crisis, pollution or unfair competition, instability sets in. In unprepared regions, the threat to both food and social security intensifies.

Marine ecosystems have already undergone massive shifts due to human exploitation of resources and, more recently, climate change. The impacts from these have resulted in decreased maximum catch potential for the fishing industry. For instance, significant increases in ocean temperatures in the central-eastern Atlantic are shifting the distribution and migratory patterns of several

3 FAO (2018), *State of the World Fisheries*, Rome.

fish populations.<sup>4</sup> In shallow tropical waters, fish stocks are projected to decrease by 40% due to the warming and acidification (Figure 1).<sup>5</sup> The impact of climate related stresses on growth, mortality and other population traits would be far greater for species that already suffer from the effects of overexploitation, depletion and habitat destruction.

Such pressure on marine life, coupled with the subsequent increase in competition to access dwindling fisheries resources, has accelerated illegal, unreported and unregulated (IUU) fishing to be one of the greatest

4 Lam, V. W. Y., Cheung, W. W. L., Swartz, W., & Sumaila, U. R. (2012), *Climate change impacts on fisheries in West Africa: implications for economic, food and nutritional security*, *African Journal of Marine Science* 34:1, 103-117.  
5 Intergovernmental Panel on Climate Change (2019), *The Ocean and the Cryosphere in a Changing Climate*.

threats to the sustainable exploitation of fish population.<sup>6</sup> Today, one out of six fish on consumers’ plates is caught illegally, often supporting criminal networks whose illegal fishing activities often involve other crimes, including human rights abuses.<sup>7</sup> In some cases, vessels that fish illegally have been documented to be trafficking drugs or arms, laundering money or engaging in human rights abuses. These criminal activities constitute a direct threat to security that add to the environmental threats caused by the unsustainable use of marine resources.<sup>8</sup> When IUU fishing threatens the food security and livelihoods of coastal countries, it also creates fertile ground for criminal activities and terrorist recruitment.<sup>9</sup> The explosion of pirate attacks in the Western Indian Ocean and the Gulf of Guinea, for example, has been linked to the surge in IUU fishing by foreign fleets that has decimated the fish populations that previously sustained local communities in these waters.<sup>10</sup> The loss of local fisheries means that vulnerable coastal States lose revenue, employment opportunities and infrastructure development from fisheries-related industries, and suffer from food insecurity, instability and loss of biodiversity as a result.<sup>11</sup> In turn, this can feed into other destabilising developments, such as forced migration. In short, **illegal and unsustainable fishing practices greatly amplify the negative effects of climate change on already weakened ecosystems and exposed coastal communities.**

The interconnectivity of marine ecosystems transcends man-made boundaries, and forces us to broaden our understanding of 3S impacts at the

6 United Nations (2019), *The Sustainable Development Goals Report*.  
7 UNODC (2011), *Transnational Organised Crime in the Fisheries Sector, Focus on: Trafficking in Persons Smuggling of Migrants, Illicit Drugs, Trafficking*, Vienna.  
8 *Ibid.*; OECD (2013), *Tax Evading the Net*. OECD Publishing.  
9 IUU Watch available at : [www.iuuwatch.eu](http://www.iuuwatch.eu)  
10 World Economic Forum, *We have the tools to tackle illegal fishing. It's time to use them*, available at [www.weforum.org/agenda/2019/01/we-have-the-tools-to-tackle-illegal-fishing-lets-use-them/](http://www.weforum.org/agenda/2019/01/we-have-the-tools-to-tackle-illegal-fishing-lets-use-them/); European Parliament, *Piracy and armed robbery off the coast of Africa*, Brussels, March 2019. [www.europarl.europa.eu/RegData/etudes/IDAN/2019/635590/EPRS\\_IDA\(2019\)635590\\_EN.pdf](http://www.europarl.europa.eu/RegData/etudes/IDAN/2019/635590/EPRS_IDA(2019)635590_EN.pdf)  
11 North Atlantic Fisheries Intelligence Group (NA-FIG), INTERPOL. (2017). *Chasing Red Herring: Flaws of Convenience and the Impact on Fisheries Crime Law Enforcement*. NA-FIG: Oslo.



national, regional and international levels. The EU has the largest marine territory in the world,<sup>12</sup> including parts of the tropics, and many of its outermost coastal communities are severely exposed to the combined effects of climate change and IUU fishing.

The EU is a major global fishing power in addition to being the world’s largest trader of fishery and aquaculture products in terms of value, surpassing China’s fish trade by more than EUR 2.3 billion.<sup>13</sup> In 2017, seafood imports from non-EU countries reached a 10-year peak of EUR 25.3 billion.<sup>14</sup> The status of the EU as the world’s largest seafood market means that it shoulders significant responsibility. With an informed and engaged consumer base, the EU Member States are well placed to take concrete action to close their borders to seafood caught in an unsustainable manner, produced in appalling working conditions or under illegal circumstances. In the context of ongoing policy debates and the European Green Deal launched by the von der Leyen Commission, all imports of fish products need to be traceable and come from sustainable sources, *i.e.* they must respect human rights and not externalise their detrimental impacts onto marine ecosystems beyond EU borders. The EU has a “duty of care”<sup>15</sup> to not create inequality and instability outside its own waters. Becoming aware of the 3S parameters makes it possible to provide more effective responses. In this report, WWF builds on this methodology to call on EU decision makers to adopt ambitious regulations, as well as more responsible actions from industry and consumers, in order to overcome challenges for the well-being of current and future generations.

12 European Environment Agency: <https://www.eea.europa.eu/themes/water/europes-seas-and-coasts/europes-seas-and-coasts> ; France, *Limites maritimes.gov* : <https://maritimelimits.gouv.fr/find-out-more/context>.  
13 EUMOFA (2018), *the EU fish market; 2018 edition*.  
14 *Ibid.*  
15 Under such a duty, resource users are required to take all reasonable and practical steps to prevent environmental harm arising from their action. See for example Bates G (2001), *A Duty of Care for the Protection of Biodiversity on Land*, Consultancy Report, Report to the Productivity Commission, AusInfo, Canberra ; Graeger N., Leira H. (2019), *Introduction: The Duty of Care in International Relations. Protecting Citizens Beyond the Border*.

**ILLEGAL AND UNSUSTAINABLE FISHING PRACTICES GREATLY AMPLIFY THE NEGATIVE EFFECTS OF CLIMATE CHANGE ON ALREADY WEAKENED ECOSYSTEMS AND EXPOSED COASTAL COMMUNITIES.**



200 fishing boats were previously grounded because of IUU fishing activity, with the company's license suspended, Indonesia.  
© James Morgan / WWF-US





## SUSTAINABILITY, STABILITY & SECURITY

Traditional fisheries, Tun Mustapha Park, Malaysia.  
© Mazidi Abd Ghani / WWF-Malaysia



# SUSTAINABILITY, STABILITY & SECURITY

When the balance between people and the ecosystems they rely on for their livelihoods and food is upset, instability takes over and can appear in many forms, resulting in an increase of risks to security and peace.<sup>1</sup> Several international organisations have recently turned their attention to the issue of the unsustainable management of fish stocks and the crimes that may ensue.<sup>2</sup> In 2011, the United Nations Office on Drugs and Crime explored, for the first time, links between the fishing industry and other criminal activities such as human trafficking, smuggling of migrants, corruption, tax fraud, drug trafficking and piracy.<sup>3</sup> These criminal activities are widespread and continue today, with forced labour in the fishing industry being the most frequently reported offence.<sup>4</sup>

Despite the growing awareness of the consequences of IUU fishing and related criminal activity on security and peace, a number of factors allow IUU fishing to continue, threatening the sustainability, stability and security of countries concerned. Both externally and internally, the EU is well positioned to put to an end to the adverse spillover effects of IUU and related criminal activities.

<sup>1</sup> WWF (2016), *Sustainability, Stability, Security, Why it is vital for global security and stability to tackle climate change and invest in sustainability*.

<sup>2</sup> Interpol, Fish Crime webpage (2019) available at [www.interpol.int/en/Crimes/Environmental-crime/Fisheries-crime](http://www.interpol.int/en/Crimes/Environmental-crime/Fisheries-crime).

<sup>3</sup> UNODC (2011), *Transnational Organized Crime in the Fishing Industry. Focus on: Trafficking in Persons Smuggling of Migrants Illicit Drugs Trafficking*.

<sup>4</sup> UNODC (2016), *Global Report on Trafficking in Persons*, United Nations publication, Sales No. E.16.IV.6.

## OUTSIDE OF EUROPEAN WATERS – WHAT’S GOING ON UNDER ACCESS AGREEMENTS?

International agreements for access to fisheries are common throughout the world and allow fishers from one country to harvest fish in another country’s waters. Access agreements can be public (signed between two countries) or private (between a country and a foreign company).

Since the late 1970s, the EU has entered into bilateral fishing agreements with third countries, today known as Sustainable Fisheries Partnership Agreements (SFPAs). SFPAs enable EU vessels to fish surplus stocks in partner countries’ exclusive economic zones (EEZs) in exchange for financial compensation from the EU. This is particularly relevant for Spain and France, which have the largest fleets that access partner country EEZs under SFPAs. The underlying principle of SFPAs is to create mutual socio-economic benefits for the coastal States and the EU, whereby the EU pays for access to fish the surplus stocks which the coastal State is not utilising. Nevertheless, within the changing dynamics of global fisheries, challenges remain to make sure such agreements do not impact the food security of coastal communities or regional stability, most particularly in Africa, where competition for fisheries resources is increasing.

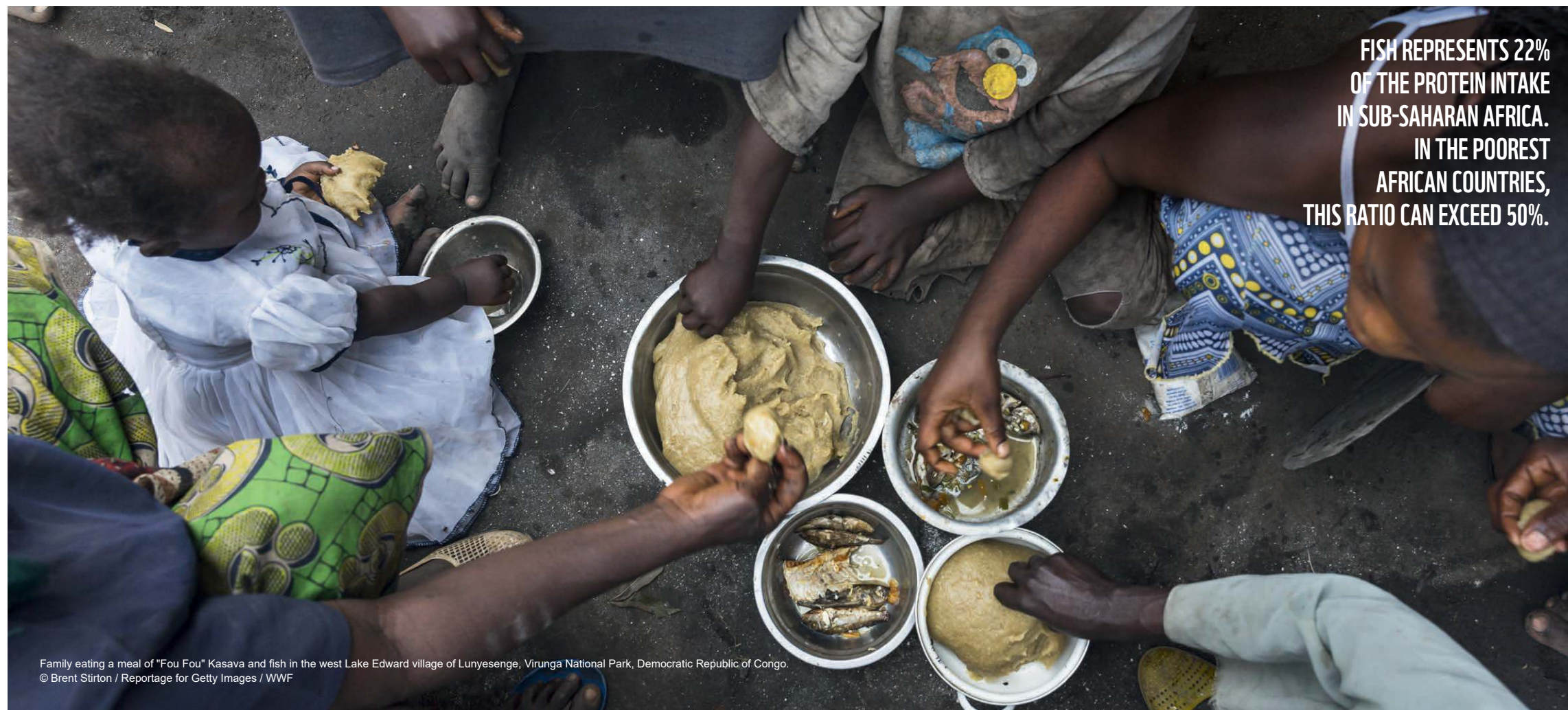
The first challenge of SFPAs lies in the stock assessments, which measure the actual “surplus” of fish available for the EU to access.<sup>5</sup> It is the responsibility of the EU to provide necessary support and that of the coastal State to provide transparency, especially when the coastal State might sign further fisheries access agreements with other distant-water fishing nations. Five countries are responsible for 90% of the distant water fishing effort internationally (see Figure 1).<sup>6</sup> Distant water fleets target fish in locations where governance and enforcement are limited, primarily in the Pacific, East Africa and West Africa. They have moved their efforts to other regions to improve their fishing capacity or, in some cases, because of the poor state of fish stocks in their own waters. While the majority of distant water vessels are authorised, under-reporting of catches and lack of transparency around the exploitation of coastal States’ resources is common.<sup>7</sup>

The main issue associated with access agreements (other than the EU SFPAs) is the lack of transparency relating to, among others, the quantity of fish caught and the number of vessels engaged in fishing. The severe lack of data on what is extracted from the sea weakens scientific research on the impact of fisheries, which then undermines sustainable management of a region’s resources. This is especially problematic when it comes to highly migratory species that move from one EEZ to another or to the high seas as those stocks are targeted by a multitude of fleets. While coastal States have the main responsibility to overcome this challenge, the EU, leading by example, and other distant water fishing nations (DWFN) could do much more to encourage fishing activities carried out under access

<sup>5</sup> Birdlife, CFFA, WWF, *EU-Africa Fisheries Agreements : what’s at stake?*, Event at the EESC the 15<sup>th</sup> November

<sup>6</sup> STIMSON (2019), *Shining a Light: The Need for Transparency across Distant Water Fishing*, Environmental Security Program.

<sup>7</sup> Ibid.



Family eating a meal of "Fou Fou" Kasava and fish in the west Lake Edward village of Lunyesenge, Virunga National Park, Democratic Republic of Congo.  
© Brent Stilton / Reportage for Getty Images / WWF



agreements to be sustainable. For example, market advantages could be granted to transparently produced fish products, which would in turn respond to increasing consumer demand for sustainable products and further improve fishing agreement mechanisms.

Despite improvements made for SFPAs to become more transparent and sustainable, there is still work to be done when it comes to the activities of EU fishing fleets under these agreements. Certain technical requirements, including mitigation measures related to bycatch of sensitive species such as seabirds and turtles, only apply to EU vessels fishing within EU waters. As a consequence, fishing outside EU waters raises significant concerns about sustainability and best practices, especially given that these activities take place truly out of sight for European consumers and that the EU technical measures regulations do not always apply.

Fish represents, on average, 22% of the protein intake in sub-Saharan Africa; however, in the poorest African countries, this ratio can exceed 50%.<sup>8</sup> The impacts of overexploitation on the stability of certain African regions are already being felt. Intensive fishing pressure from foreign fleets and local industrial fishing companies, which are often front companies for foreign vessel operators wishing to access additional resources, contributes to overexploitation of fish stocks which leads to a lack of available resources for local people, including young people, and can ultimately be a contributing factor to migration. In addition, increasing competition for access to fewer resources creates rising tensions between various communities and neighbouring regions.

8 CAOPA and REJOPRAO (2016), *Voices from African Artisanal Fisheries, Calling for an African Year of Artisanal Fisheries*, Stockholm.

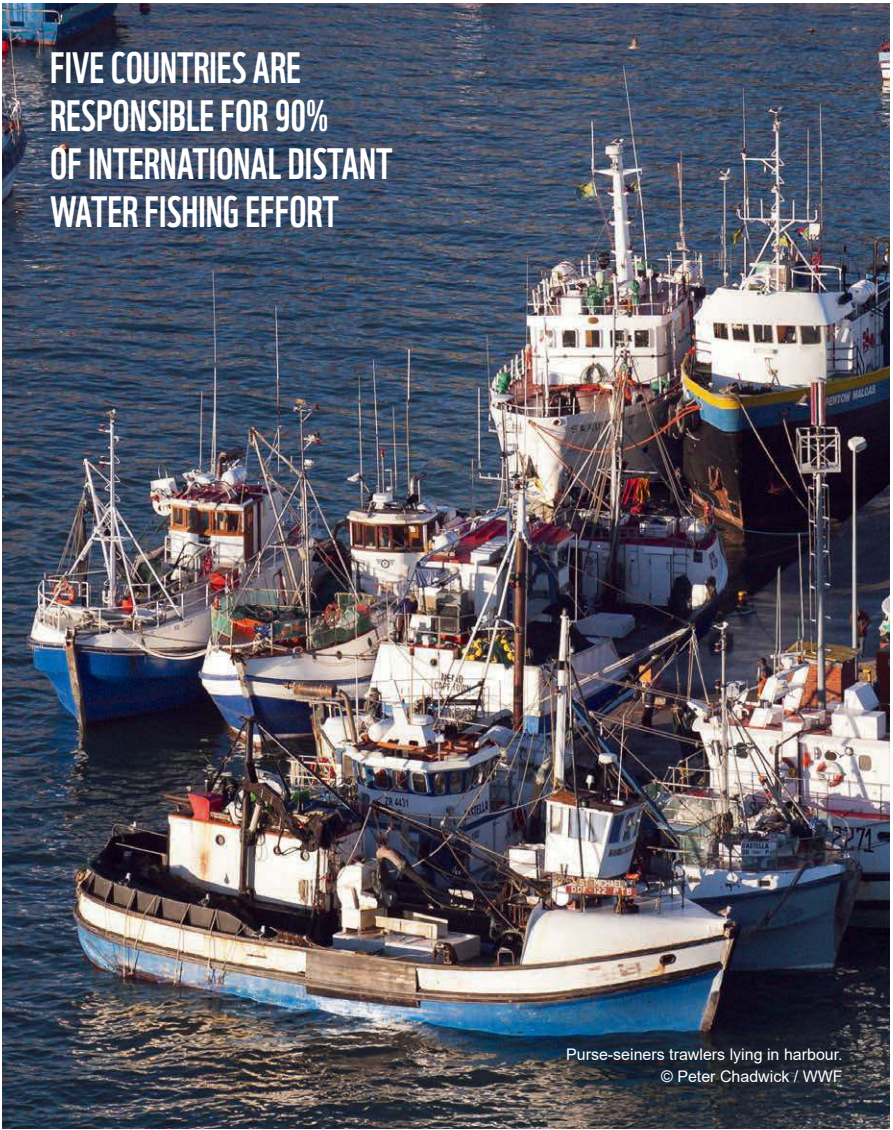
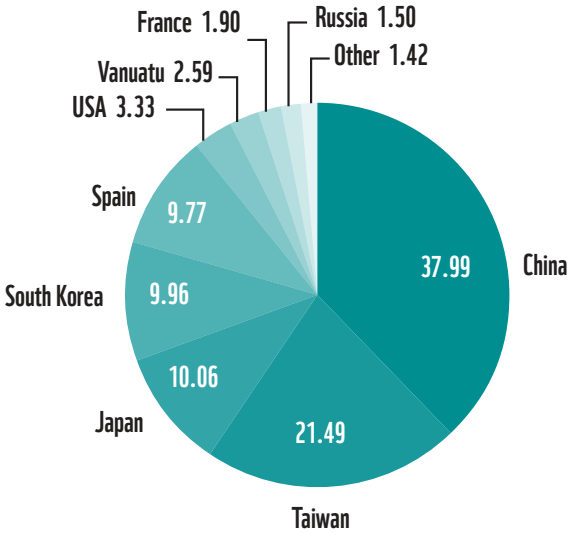


Figure 2 – Proportion of fishing efforts by the top ten Distant Water Fleets (as % of the total effort of DWFN).



Source: based on AIS data from Global Fishing Watch, 2016-2017. The overview does not distinguish between fishing activities carried out in the remit of access arrangements or outside of such arrangements.

## FOCUS

# IMPACTS OF FISHERY OVEREXPLOITATION ON WOMEN AND YOUNG PEOPLE IN WEST AFRICA

By making fish – a source of protein, fatty acids, vitamins and minerals – available at low prices for the local population, women and men from the artisanal fishing sector in Africa greatly contribute to food security.<sup>1</sup> However, the fish in the waters off West Africa are increasingly supplying fish farms that export their aquaculture products and overseas.<sup>2</sup> In both Senegal and Gambia, the fish on which coastal communities and the sub-Saharan region depend are being diverted from local food markets to supply factories where they are processed into fishmeal and fish oil for export.<sup>3</sup>

In Senegal, foreign-owned fish processing units have been set up next to seafood landing sites, and their numbers are increasing. The operators of these processing units buy locally fished seafood at low prices and process them into fresh and frozen fish products, or into fishmeal, destined for export. Between 2011 and 2014, more than ten industrial processing units were set up by Chinese and Korean operators in Kayar and M'bour in Senegal.<sup>4</sup> The products from these processing factories are exported to China, Korea and EU countries. As they grow in number, these factories make it harder for local fish processors, who are traditionally women, to purchase fish for processing, and then see their small businesses start to fail. Furthermore, in fishing villages, hundreds of young people, unemployed and hoping for a better life, have given up fishing due to this fierce competition and instead emigrate. In the words of a artisanal fisher in Mauritania: “*We have boats, but no crew to go and fish on them. Even the Senegalese [living in Mauritania] who are more experienced at fishing than us, no longer find crews. Many of them have migrated.*”<sup>5</sup>

1 Ibid.  
2 WWF (2017), *Nourrir l'humanité à l'horizon de 2050*, 59 p.; Thiao, D., Chaboud, C., Samba, A., Laloë, F., Cury, P.M. (2012), *Economic dimension of the collapse of the 'false cod' Epinephelus aeneus in a context of ineffective management of the small-scale fisheries in Senegal*, African Journal of Marine Science 34 (3), 305-311.  
Lam, V.W.Y., & Cheung, W.W.L., Swartz, W. & Sumaila, U.R. 2012. Climate change impacts on fisheries in West Africa: implications for economic, food and nutritional security. African Journal of Marine Science, 34(1): 103–117.  
Greenpeace (2019), *A Waste of Fish – Food security under threat from fishmeal and fish oil industry in West Africa*, Greenpeace International, 52 p.  
3 CAOPA and REJOPRAO (2016), *Voices from African Artisanal Fisheries, Calling for an African Year of Artisanal Fisheries*, Stockholm.  
4 Birdlife, CFFA, WWF (2019), *EU African sustainable fisheries partnership agreements: What's at stake?*, Event at the EESC, (15 November, 2020).  
5 CAOPA and REJOPRAO (2016), *Voices from African Artisanal Fisheries, Calling for an African Year of Artisanal Fisheries*, Stockholm.

## ILLEGAL FISH SLIPPING THROUGH THE NET – WEAK CONTROL AT SHORE AND AT SEA

While technical and human capacity as well as political will are often lacking in developing countries to control fishing activities at shore or at sea, developed countries – who have greater institutional resources – do not face the same weaknesses, and therefore must reinforce their means of control and enforcement. For instance, the delays that exist in the implementation of an efficient control system for EU fleets have already been well documented.<sup>9</sup> Some of these delays are explained by the time necessary for technical developments, (e.g. to implement new technologies and IT systems) or for their transposition into national law in EU Member States. However, such delays are also the

9 European Commission, *Report from the commission to the European and the Council, Implementation and evaluation of Regulation (EC) 1224/2009 establishing a Union control system for ensuring compliance with the rules of the common fisheries policy as required under Article 118, REFIT*, Evaluation of the impact of the fisheries regulation; Client Earth (2019), *The Spanish legal process for prosecuting illegal fishing: A story of success?*; Client Earth (2017), *Slipping through the net - The control and enforcement of fisheries in France, Ireland, the Netherlands, Poland, Spain and the UK (England)*; Joint NGO priorities on the revision of the EU Fisheries Control System, October 2019.

result of a lack of political will, sometimes due to the prioritisation of other issues.” Unfortunately, weak control encourages IUU fishing, as operators perceive it as a low-risk activity, sometimes using criminal networks to commercialise their products.

Today, the European Union has the world's largest maritime territory, with France representing the second largest maritime territory in the world after the USA.” However, control of fishing activities remains weak in European waters, especially in the outermost regions which are often forgotten in enforcement of the CFP. The EU must ensure the equality of all its citizens, including those living in remote coastal communities in the outermost regions, particularly as they are the most heavily affected by the adverse effects of climate change. The lack of strong control mechanisms is an incentive for the development of unsustainable practices that sometimes shape organised crime and corruption. This, in return, threatens economic and political stability.

10 Ibid.  
11 European Environment Agency: <https://www.eea.europa.eu/themes/water/europes-seas-and-coasts/europes-seas-and-coasts> ; France, *Limites maritimes.gov* : <https://maritimelimits.gouv.fr/find-out-more/context>



# THE COCAINE OF THE SEA

In China, the swim bladder of the red acoupa fish (*Cynoscion acoupa*) is considered not only a luxury food product, but is also valued by traditional medicine for its health benefits. As a consequence, over the years, demand from China has brought stocks of species in the same family, the Chinese bahaba (*Bahaba taipingensis*) and the Gulf of Mexico's totoaba (*Totoaba macdonald*), to the brink of collapse, with both species now listed as “critically endangered” by the International Union for Conservation of Nature (IUCN). The international trade in these fish’s swim bladders – which end their journey for the most part in Asia, specifically in China and Hong Kong – is worth billions of euros.<sup>1</sup> The totoaba has come to be known as the “cocaine of the sea”, as international drug traffickers have begun to smuggle the fish for the high value of its swim bladders and as a result of weak fisheries monitoring and sanctioning schemes. This illegal wildlife trade is viewed as a less risky activity than actual drug trafficking.<sup>2</sup>

Trade in the swim bladders of these fish has been increasing for a number of years in South America. In French Guiana, the red acoupa swim bladders are first sold locally, either fresh or dried, with most then sent to the Asian market. In 2018, it was estimated that the fish was priced at 3 euros/kg, but its swim bladder was worth 150 euros/kg, locally. Once exported to China or Hong Kong, the price reached at least 2,000 euros/kg.<sup>3</sup>

This valuable trade appears to have become a key motivation for illegal, unregulated and unreported (IUU) fishing in French Guiana, where a number of illegal fishing vessels from neighbouring countries are intercepted every year.<sup>4</sup> Regulation and controls of these activities are now crucial. However, the authorities in this outermost region of the EU have a limited capacity to conduct controls, with only 87 taking place in 2018.<sup>5</sup> Infractions were discovered in almost 70% of cases, leading to the seizure of 190 kilometres of fishing nets, 40 tonnes of illegally caught fish and 342 kilograms of swim bladders.<sup>6</sup>

UIU fishing is at the heart of the trade of the red acoupa fish and its swim bladder. It also contributes to an increase in fishing pressures and bycatch, mainly of dolphins and turtles, undermining the health of the region's marine ecosystems and resources. The combined impacts on long-term social and economic development of French Guiana's seafood sector are tremendous, as there is little incentive to develop alternative sources of revenue.

1 Phelps Bondaroff, Teale N., Reitano, Tuesday and van der Werf, Wietse (2015), *The Illegal Fishing and Organized Crime Nexus: Illegal Fishing as Transnational Organized Crime, The Global Initiative Against Transnational Organized Crime and The Black Fish*.

2 ENACT, *What is wildlife crime, and why does it affect us?* Available at : <https://enactafrica.org/research/explainers/what-is-wildlife-crime-and-why-does-it-affect-us>

2. Data collected on the field by WWF. In addition such information has been reported in few reports; see for instance USA ATTORNEY SOUTHERN DISTRICT OF CALIFORNIA (2013), *Massive Trade in Endangered Species Uncovered; U.S. Attorney Charges 7 with Smuggling Swim Bladders of Endangered Fish Worth Millions on Black Market*.

4 Cross A ETEL. Bilan D'activité 2018. centre national de surveillance des pêches, centre d'appui au contrôle de l'environnement marin.

5 EAG†: Bilan 2018 des opérations de police des pêches en Guyane

5 FAG : Bilan 2018 des opérations de police des pêches en Guyane  
<https://www.defense.gouv.fr/english/operations/actualites2/fag-bilan-2018-des-operations-de-police-des-peches-en-guyane>

6. *Ibid.*

## THE NEED FOR STRONG SANCTIONS FOR STEALING OUR RESOURCES

In the EU, fishing vessel operators need to comply with the rules of the CFP. When these rules are broken, EU Member States are required to initiate infringement procedures in order to sanction offenders.<sup>12</sup> Today, however, both in the EU and globally, the lack of implementation of dissuasive and deterrent sanction schemes continues to create loopholes exploited by IUU fishing operators.

Without dissuasive sanctions, IUU fishing activities persist, threatening fish stocks and reducing the resources available for law-abiding fishers. This, in turn, reduces the profitability of the fishing industry and the employment opportunities in coastal communities. An effective control enforcement system, including deterrent sanctions which take the damage done to the marine environment and socio-economic fabric into consideration, is one of the key factors for ensuring sustainable fishing activities in the future.

12 European Commission (2014), *Illegal, Unreported and Unregulated Fishing: Sanctions in the EU*, Policy Department B: Structural and Cohesion Policies



**WITHOUT DISSUASIVE  
SANCTIONS,  
IUU FISHING  
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THREATENING  
FISH STOCKS AND  
REDUCING THE  
RESOURCES AVAILABLE  
FOR LAW-ABIDING  
FISHERS.**

## FOCUS

# THE FRENCH CASE: WHAT IS AT STAKE?

In France, sanctions imposed by the courts can be both administrative and criminal. Administrative sanctions may include fines, or the suspension or withdrawal of fishing licenses. Additionally, authorities can assign penalty points to the licence holder or the owner of the fishing vessel in case of serious infringements, as required under EU law. However, in December 2018, a request for information to the French authorities revealed that sanctions are negligible compared to the size of the fleet and that the penalty system is not effectively implemented: no sanctions are applied for failures to comply with the Landing Obligation, EU legislation which requires all bycatch to be landed instead of being discarded at sea, to avoid waste.<sup>1</sup> Moreover, France lacks consolidated and public data on the exact number of administrative sanctions imposed each year related to infringements.

On criminal sanctions, prison sentences are restricted to activities occurring within the limits of the French territorial sea (12 nautical miles off the coast).<sup>2</sup> If an infringement takes place beyond this limit, only administrative sanctions can be imposed.<sup>3</sup> This restricts the dissuasive effect of criminal sanctions to the territorial sea (*e.g.* only a small subset of the areas in which fishing may take place). Nationals should continue to be held accountable for IUU fishing activities carried out anywhere, whether inside France's entire EEZ or internationally.

1 Client Earth (2019), The control of the Landing Obligation in France, [www.clientearth.org/france-denmark-and-spain-fail-to-enforce-ban-on-fish-discards-new-reports](http://www.clientearth.org/france-denmark-and-spain-fail-to-enforce-ban-on-fish-discards-new-reports).

2 France, Code rural et de la pêche maritime, mis à jour en 2019.

3 *Ibid.*



WHICH NATIONALITY DO YOU WANT? THE ISSUE OF FLAGS OF CONVENIENCE

A significant proportion of vessels engaged in IUU fishing fly so called “flags of convenience”. This term was first used in 1974 by the International Transport Workers’ Federation and is defined as when “the actual owner of the activities and the control of the ships is in a country other than that of the flag of the ship”. Opting for a flag of convenience means fishing operators intentionally operate their fishing vessel under the flag of a country with particularly lax rules, and then potentially re-flag to another country’s flag to conceal their past activities. It is currently not an obligation for the owner of a company to be physically present in the country where that company is carrying out its fisheries activities. Hence, the definition of flags of convenience might be considered as very rigid in terms of fiscal affairs law. Nevertheless, a flag of convenience intentionally circumvents international measures for legally or economically favourable reasons (*e.g.* avoiding tax, circumventing environmental or labour regulations, etc.) with no incentives to properly regulate vessels. This enables IUU operators to maintain secrecy over the identity of the real beneficiary – the person at the heart of the criminal network –, and to avoid regulatory control over their activities and any sanctions for illegal practices.<sup>13</sup> These vessels travel anonymously, hopping from one “flag of convenience” to another.

Most of the time, the secret identity of the beneficiaries is hidden behind holding companies in offshore jurisdictions that do not engage in effective exchanges of information, which then prevents effective investigations (Table 1).

Vessels flying flags of convenience increase pressure on fish stocks where no or poor regulations around

13 North Atlantic Fisheries Intelligence Group (NA-FIG), INTERPOL. (2017). *Chasing Red Herrings: Flags of Convenience and the Impact on Fisheries Crime Law Enforcement*. NA-FIG: Oslo.

Table 1 – Listed IUU vessels and known instances of flying flags of convenience (FOCs), compared against identified tax havens.

	Number of IUU listed vessels	Current registries listed as FOCs by the ITF	OECD – List of uncooperative tax havens	The EU list of non-cooperative jurisdictions for taxpurposes
	TMT Database. Many vessels on IUU vessel lists have an “unknown” flag.	The following countries have been declared FOCs by the ITF’s Fair Practices Committee.	The jurisdictions indicated below are not implementing the OECD standards of transparency and effective exchange of information.	The countries on the list below have refused to enter into a dialogue with the EU or to remedy shortcomings in the area of good fiscal governance (situation as of 10 October 2019).
Antigua and Barbuda		X	X	
Bahamas		X	X	
Barbados		X	X	
Belize		X	X	X
Bermuda		X	X	
Comoros (also red-carded by the EU)	2			
Cyprus	1	X	X	
Fiji	1			X
Gibraltar		X	X	
Liberia	2	X	X	
Malta		X	X	
Marshall Islands		X	X	Removed from the list in 2018
Panama	8	X	X	
St Vincent (also red-carded by the EU)	2	X	X	
Sri Lanka	9	X	X	
Vanuatu		X	X	X

Note: Data for listed IUU vessels have been extracted from the TMT database from the last 10 years. Here, it is important to note that 28% of the vessels identified were of unknown flag. The identified countries here only include those that have a link with a tax haven. Data extracted 15 September 2019.

fishing activities apply, thus creating unfair competition for fishers who play by the rules. On a broader level, flag-hopping also results in a loss of revenue for governments, a situation that is detrimental to development and economic growth. With this in mind, IUU fishing, facilitated by the practice of flying a flag of convenience, damages the food security and livelihoods of coastal countries and has previously also created fertile ground for piracy

and terrorist recruitment.<sup>14</sup> Fisheries resources are a common good which renders fishing a unique activity at sea. Our ocean’s resources must be protected and properly managed for the benefit of all. This cannot happen without the eradication of the practice of flag-hopping in the fisheries sector.

14 United Nations Office on Drugs and Crime (2011), Transnational Organized Crime in the Fishing Industry. Focus on: Trafficking in Persons, Smuggling of Migrants, Illicit Drugs Trafficking.

WHITE COLLAR CRIMES – WHO REALLY BENEFITS?

The lack of transparency on the identity of beneficial owners hampers investigators’ efforts to identify those who really benefit from IUU fishing and the crimes associated with it. One of the only ways to identify the key player(s) behind a company or a trust in a network of IUU operations is to obtain separate responses from each national jurisdiction. However, this process is time consuming and complex in an environment that shifts rapidly and is shrouded in corruption. The level of secrecy across IUU networks is linked with highly organised corporate-level criminals who make use of financial havens to hide the trail of beneficial ownership.

Despite a lack of data, it is increasingly apparent that locally owned and operated fishing vessels bring simplicity to the complex network of companies and individuals involved in fishing activities. In some cases, this is characterised by firms owning multiple vessels across several countries, potentially monopolising access rights to fishing areas or opportunities to fish. In the EU, Member States have weak data collection processes, resulting in a lack of transparency on vessel ownership (Table 2).<sup>15</sup>

In the EU, while information regarding fishing vessels flying the flag of each Member State is publicly available through the Community Fishing Fleet Register, information about ownership of these vessels and their allocated quota is not always available.<sup>16</sup> These gaps allow bigger players to monopolise quotas on certain fisheries.

15 European Commission, *Executive Agency for Small and Medium-sized Enterprises (EASME), Study on ownership and exclusive rights of fisheries means of production*, Service Contract: EASME/EMFF/2016/1.3.2.1/SI2.766458  
16 *Ibid.*

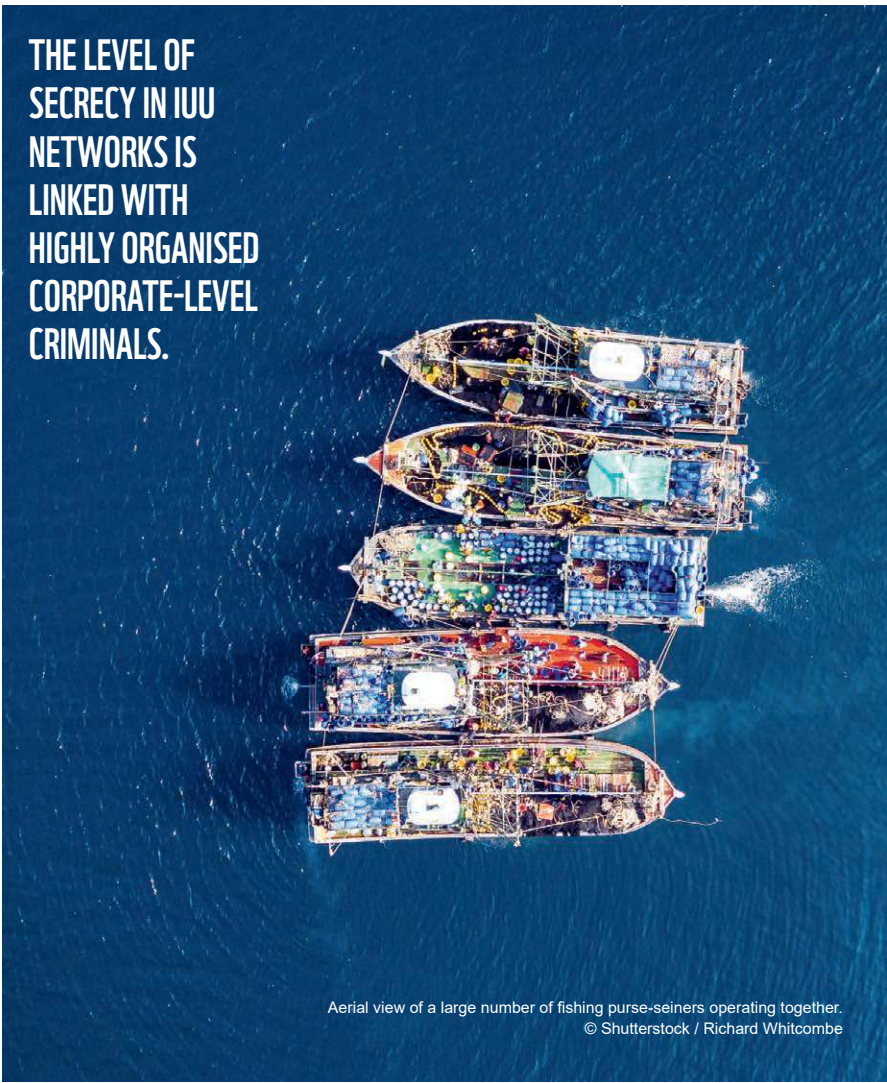


Table 2 – Summary of data collection across EU Member States in 2016.

Member State	Type of information				
	Quotas	Licences	Vessels ownership	Company ownership	Shareholder Nationality
Belgium	Partially collected	Partially collected	Partially collected	Collected	Collected
Denmark	Collected	Collected	Collected	Partially collected	Not collected
France	Not collected	Not collected	Partially collected	Partially collected	Partially collected
Germany	Not collected	Not collected	Not collected	Partially collected	Partially collected
Ireland	Partially collected	Collected	Collected	*	*
Netherlands	Not collected	Not collected	Not collected	Partially collected	Partially collected
Spain	Collected	Collected	Collected	*	*
Sweden	Partially collected	Collected	Collected	*	*
United Kingdom	Collected	Collected	Partially collected	Collected	Collected

Collected Partially collected Not collected \* Available, but behind "pay-wall"

Source: European Commission (2019), Study on ownership and exclusive rights of fisheries means of production.



FOCUS

DIRTY BUSINESS, EVEN IN THE MOST REGULATED FISHERIES

The individuals behind IUU fishing hide behind complicated vessel ownership networks to avoid sanctions. A 2019 study showed that the absence of a global database for vessel and ownership information creates challenges for identifying and mapping ownership as vessels change owners over time.<sup>1</sup> The study began to map the networks of ownership behind the global tuna purse seine fleet and found that data variability across jurisdictions and Regional Fisheries Management Organisations (RFMOs) were a primary obstacle to the successful completion of the database.

The transnational nature of vessel ownership, even in fleets that are comparatively more transparent and better regulated than others, disguises the jurisdiction of ultimate beneficial ownership. In some cases, it is likely that vessels are flagged to and registered to companies operating in developing countries in order to avoid quota limitations placed on developed countries, a rule in place in certain RFMOs. In the case of this mapping project, it was discovered that fishing vessels flagged to one jurisdiction were often beneficially-owned by companies or individuals of a different nationality.

For example, while 13 purse seiners were flagged to and registered to companies in El Salvador, Guatemala and Curacao, 100% of these vessels were in fact owned by Spanish companies.<sup>2</sup> While this practice is legal, as it allows fishing companies to access quotas and maintain capacity, especially as the EU loses its historical rights under new RFMO allocation discussions, in some cases, this re-flagging behaviour relates to an incentive to circumvent international measures put in place to manage fishery resources. Re-flagging also allows vessels to be subjected to weaker flag State control, avoiding strong monitoring requirements and potential condemnations for supporting or benefitting from IUU fishing activities. Generally, shell companies have little to no presence beyond basic contact information and, when used in a series of layers across jurisdictions, they serve to complicate the process of identifying the beneficial owners. The Spanish firm Sea Group SL, South Korea’s Sajo Systems, and several Chinese conglomerates, including the Beijing State-Owned Capital Operation and Management Center, and Pingtan Marine Enterprise Limited, the latter of which is listed on the NASDAQ Stock Market, were each named in a recent report of having suspected ties to IUU fishing practices in 2019.<sup>3</sup>

<sup>1</sup> C4ADS (2019), Strings Exploring the Onshore Networks behind illegal, unreported, unregulated fishing.  
<sup>2</sup> Ibid.  
<sup>3</sup> Ibid.

THE RISK OF SLAVERY BEHIND OUR SEAFOOD

The increasing demand for fish worldwide has led to overexploitation of fish stocks, pushing fishing activities further out to sea in search of fish, with vessels remaining far from the coast for longer periods of time.<sup>4</sup> The race to fish, combined with the need to optimise costs and benefits for seafood companies, brings with it the risk of modern slavery as a way to decrease the costs of operations and increase profits. Fishers are among the most vulnerable of all workers and it has been repeatedly documented that IUU fishing often coincides with human rights abuses, including human trafficking and modern slavery.<sup>5</sup> For seafood companies, countries in developing nations remain a popular choice for sourcing, processing and packaging in an effort to lower value chain costs. However, this may come with the risk of international labour standards being violated. Supply chain transparency is crucial to addressing this issue: consumers need to know where seafood products come from in order to keep slave-caught seafood off their tables.

Furthermore, consumption of fish products is high in the EU (Table 3), thus, in addition to slavery-free seafood, decision makers, industry and consumers all have a responsibility to help protect food security in countries where high-value species are no longer consumed by local populations, but exported to developed countries.

The demand for natural resources helps explain several long-standing conflicts, but the association of growing seafood demand, notably in developing countries, and the increasing impacts of climate change is an additional threat to stability and national security. We must ensure that our consumption patterns do not undermine the livelihoods of coastal communities or continue to degrade our ocean’s habitats and ecosystems. In this respect, we need to know where our products come from and how they have been caught so that we can make an informed choice about what we eat.

<sup>17</sup> ILO (2018) *Background Paper: Consultative Forum on Regional Cooperation Against Human Trafficking, Labour Exploitation, and Slavery at Sea, International Labour Office – Jakarta: ILO.*  
<sup>18</sup> The EU already expressed concerned on Thailand to address the human rights abuses in the fisheries sector. See: [https://ec.europa.eu/commission/presscorner/detail/en/IP\\_19\\_61/](https://ec.europa.eu/commission/presscorner/detail/en/IP_19_61)

Table 3 – Consumption of fisheries and aquaculture products (2015).

Member State	kg/person/year
Portugal	55.9
Spain	45.2
France	33.9
Luxembourg	32.0
Malta	31.5
Italy	28.4
Sweden	26.9
Latvia	26.3
EU-28	25.1
United Kingdom	24.3
Belgium	23.7
Finland	23.3
Denmark	22.9
Cyprus	22.7
Netherlands	22.2

Source: European Commission (2018), Facts and figures on the common fisheries policy, Basic statistical data, 2018 edition.

Member State	kg/person/year
Ireland	22.1
Croatia	18.4
Greece	17.3
Estonia	17.2
Lithuania	14.9
Poland	13.6
Austria	13.4
Germany	13.4
Slovenia	10.7
Slovakia	8.2
Czech Republic	7.8
Romania	6.2
Bulgaria	6.2
Hungary	4.8

FOCUS

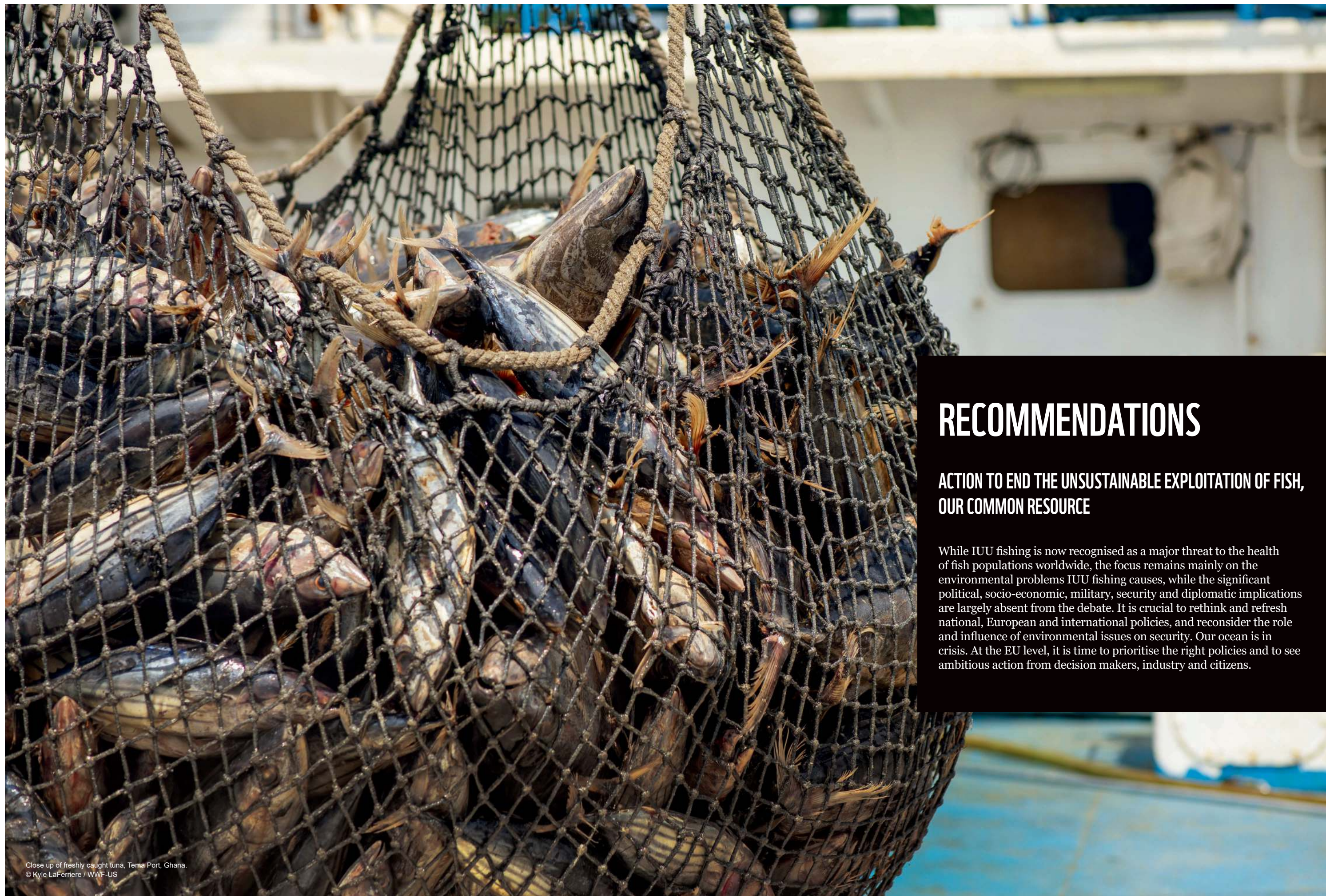
THE WORKING CONDITIONS BEHIND THE SEAFOOD WE EAT

The Pacific Ocean is home to the world’s largest tuna fisheries, providing almost 60% of the world’s tuna catch in an industry worth billions of dollars, with growing demand.<sup>1</sup> Yet, severe human rights abuses are rife. In 2016, on the high seas between Easter Island and Fiji, six Indonesian crew members killed the captain of the fishing vessel Tunago No. 61, a Tawainese tuna longliner flying the Vanuatu flag (which is a flag of convenience), as a result of the dire working conditions they were made to endure.<sup>2</sup> The fishing crew were subject to physical abuse, isolation, intimidation, threats, abusive working conditions, retention of identity documents and 20-hour workdays for weeks at a time. A crew member reported, “*I asked the captain for a medicine, he slapped my head. And he kicked me. He also said ‘if you come to ask for the medicine again, I’ll kill you’*”. Evidence showed links between the Tunago No. 61 and the Fong Chun Formosa Fishery Company (FCF), a privately owned company based in Taiwan. The Taiwanese longliner supplied tuna through transshipment to other Chinese vessels trading with FCF. The latter is a supplier to companies in both Thailand and Japan that export processed seafood to markets in the US, Europe and Asia.<sup>3</sup>

In this violent environment, it is difficult for victims to serve as witnesses in criminal or civil proceedings. Nevertheless, up to 59% of the victims interviewed that had experienced abuse on board fishing vessels reported witnessing a murder by a boat captain.<sup>4</sup> Many more cases have been documented in other regions and fisheries.<sup>5</sup>

<sup>1</sup> FA (2018), *Economic and Development Indicators and Statistics: Tuna Fisheries of the Western and Central Pacific Ocean 2017.*  
<sup>2</sup> Greenpeace (2018), Misery at sea.  
<sup>3</sup> Ibid.  
<sup>4</sup> SURTEES (2013), *Exploitation of Cambodian Men at Sea: Facts About the Trafficking of Cambodian Men Onto Thai Fishing Boats*, UNIAP, SIREN series CB-03, 2009.  
<sup>5</sup> To see more cases: <https://spyglass.fish/>





Close up of freshly caught tuna, Tema Port, Ghana.  
© Kyle LaFerriere / WWF-US

## RECOMMENDATIONS

### ACTION TO END THE UNSUSTAINABLE EXPLOITATION OF FISH, OUR COMMON RESOURCE

While IUU fishing is now recognised as a major threat to the health of fish populations worldwide, the focus remains mainly on the environmental problems IUU fishing causes, while the significant political, socio-economic, military, security and diplomatic implications are largely absent from the debate. It is crucial to rethink and refresh national, European and international policies, and reconsider the role and influence of environmental issues on security. Our ocean is in crisis. At the EU level, it is time to prioritise the right policies and to see ambitious action from decision makers, industry and citizens.



# POLICY MAKERS, TIME TO ACT!



French tuna purse-seine fishery in the Atlantic Ocean  
© Hélène Petit / WWF

The EU must lead by example and increase internal scrutiny to bring legitimacy to and promote sustainable fisheries management and seafood supply chains. EU decision makers should:

1

## AMEND THE EU CONTROL REGULATION TO ENSURE COMPLIANCE WITH THE COMMON FISHERIES POLICY AND IMPROVE THE TRACEABILITY OF FISH PRODUCTS

The success of the Common Fisheries Policy (CFP) depends on the implementation of its policies and on an effective fisheries control system that properly regulates the activities carried out at sea. To do this, the EU must:

### Ensure there is a strong system of sanctions to fight IUU fishing and create a level playing field for all fishers

This is a crucial element of successfully prosecuting vessels and nationals involved in IUU fishing. All possible infringements must be clearly explained in national legislation, which must include designating the type of entity that can be prosecuted (natural and legal persons) and widening the prosecutions to the individuals who support or benefit financially from these activities, *i.e.* the beneficial owners.

Sanctions and points systems require particular attention from national governments in the EU, and require better implementation. Monetary fines should be accompanied by the revocation of fishing licences for a significant duration and the permanent revocation of access to subsidies of any kind.

### Introduce Remote Electronic Monitoring (REM) requirements to finally secure fully documented fisheries

Remote Electronic Monitoring (REM) is key to ensuring fully documented fisheries. Indeed, data and video footage using GPS, sensors and CCTV cameras enable the effective control and monitoring of transparent and traceable fisheries.<sup>1</sup> REM has already been introduced or trialled in some EU Member States (*e.g.* Denmark, Spain) and the revision of the Control Regulation presents a unique opportunity to establish the technology across the EU.

### Make it easier to trace seafood products by mandating that catch certificates contain key traceability information

To make it possible to determine the legality of imported seafood products, sufficient information needs to be passed digitally along the supply chain to verify traceability. This requires mandating the inclusion of key data elements in the catch certificate, created under the EU IUU Regulation. This includes the requirement of a unique vessel identifier (preferably IMO number) for all vessels above 12 metres, details of the catch method, more robust definitions of catch areas with a clear distinction between exclusive economic zones (EEZs) and the high seas, and a link between catch areas and catch dates.

2

## REINFORCE ACTION ON THE GROUND AT EU MEMBER STATE LEVEL BY CREATING SPECIALISED TASK FORCES AND INCREASING INTER-AGENCY COOPERATION

Most IUU fishing activities are directly linked to associated crimes, including tax fraud. A multi-pronged approach is thus required to effectively tackle IUU fishing. Collaboration between fisheries authorities, port authorities, customs administrations, coastguards, police and other law enforcement authorities can reduce the overall cost of fighting IUU fishing and fisheries-related crimes, as it avoids duplication of efforts and enhances overall capacities. This would allow for the limited mandate of fisheries authorities to expand and improve their ability to tackle IUU fishing and its associated crimes.

<sup>1</sup> Scheveningen Control Expert Group (2015), *Report on Control and Monitoring of the Demersal Landing Obligation: Risk assessment and risk treatment*, EFCA publication; European Commission (2013), *Towards New SCIPs*, advisory Council Consultation.



3

## INCREASE TRANSPARENCY ABOUT WHO IS ACCESSING FISHERIES

To increase accountability for the sources of the seafood we eat, countries should publish a record of their registered vessels and require vessel owners to report the ultimate beneficial ownership information, as well as the allocated quotas they have at their disposal. Vessel owners should be made liable to the country in which they reside, rather than to the flag State where the vessel is registered. EU Member States should identify which of their citizens, *i.e.* natural persons, shareholders and corporate entities, are beneficial owners before allocating fishing authorisations or catch quotas.

4

## INCREASE INFORMATION PROVIDED TO EU CONSUMERS WHEN THEY BUY FISHERY AND AQUACULTURE FOOD PRODUCTS

After the Control Regulation is revised and if, consequently, a better traceability system is created, changes should be made to consumer-facing labelling of seafood products to incorporate the new information available to validate a transparent supply chain.<sup>2</sup> The Regulation on the Common Organisation of the Markets of Fishery and Aquaculture Products should be revised to create a level playing field between frozen and fresh products on the one hand, and processed and preserved products on the other. The latter group is currently exempt from listing many pieces of traceability information on food packaging, including the scientific name of the fish, the fishing gear category, the production method and the catch area. Having this information available would allow consumers to make better-informed decisions, regardless of the type of seafood product they are buying.

5

## USE EMFF INVESTMENTS TO INCENTIVISE COMPLIANT AND SUSTAINABLE FISHING PRACTICES

The post-2020 European Maritime and Fisheries Fund (EMFF) can contribute to food security in the EU by encouraging sustainable fisheries and aquaculture markets. This Fund can also be used to improve the current fisheries' control system and enforce effective control of fishing activities at sea to keep fishing practices and quotas within sustainable limits. However, funding must be conditional upon compliance by EU Member States and operators with the rules of the CFP and other EU environmental laws, with funding withdrawn when EU Member States fail to enforce sufficient mechanisms to halt illegal fishing activities.

<sup>2</sup> This is related to the Regulation (EU) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers.



Trawler operating in the Eastern Mediterranean Sea  
© Isaac VEGA / WWF

The EU and its Member States are in a unique position, globally, to lead by example, by leveraging their collective influence as major flag States and as the world's largest seafood market. Policy makers must:

6

## PUSH FOR INTERNATIONAL REGULATIONS THAT LIMIT FLAGS OF CONVENIENCE AND CLOSE IUU LOOPHOLES

It is crucial to reinforce flag State responsibilities, especially when they do not respect international measures and when controls on fishing vessels are absent. A review of the United Nations Convention on the Law of the Sea on the principles and responsibilities of the flag State could be one avenue to achieve this, in particular by further clarifying the meaning of a “genuine link” between the flag and the vessel.<sup>3</sup> It should be noted, however, that redefining the concept of a “genuine link” will likely not eliminate all the loopholes that operators exploit.

International maritime law, as laid out by the International Maritime Organization (IMO), should be amended to mandate the requirement of IMO numbers for all eligible fishing vessels, followed by better regulation of re-flagging. Exempting or severely restricting vessels from any right to change their flag is crucial as fish are common, renewable global resources and fishing is significantly different from other marine activities. Imposing limits on re-flagging should start at the national and regional levels, where Regional Fisheries Management Organisations (RFMOs) champion such measures before bringing them to the international level.

Last but not least, almost 20 years after the entry into force of the UN Food and Agriculture Organization (FAO) International Plan of Action to prevent, deter and eliminate IUU fishing, an amendment to this legal tool is required to bring it up to date with the realities faced today and the evolution of fishing activities. This action plan could, on the assumption of strong political will, become a binding instrument and close a remaining loophole to tackle IUU fishing at the international level.

7

## ENSURE THAT SEAFOOD PRODUCTS ARE BOTH FAIR AND EQUITABLE, ESPECIALLY THOSE PRODUCED UNDER SUSTAINABLE FISHERIES PARTNERSHIP AGREEMENTS (SFPAs)

Fishing activities outside EU waters should contribute to achieving the UN Sustainable Development Goals. In this context, all technical measures, including mitigation measures, should apply outside EU waters. The EU has a duty of care to make sure it does not export its fishing overcapacity outside EU waters and to reduce the environmental footprint of its imported goods.

In this regard, the EU should further increase the assessment of environmental impacts (*e.g.* on fish stocks, sensitive species and the wider marine environment) and social impacts (in particular, on coastal communities, including with regard to the role of women in the seafood sector) within the framework of SFPAs cooperation, as well as in the evaluations of these agreements (*ex-post* and *ex-ante*). Sectoral support should be transparent, more widely used and aligned with the European Union's development policy (DG Devco) and fisheries policy (DG Mare). Lastly, the EU should increase cooperation with partner countries to reinforce fisheries monitoring, control and surveillance (MCS) systems to secure sustainable and transparent fishing practices.

<sup>3</sup> United Nations Convention on the Law of the Sea, 1982, Article 91.



# INDUSTRY, YOU HAVE A ROLE TO PLAY!



Fish, shrimps, mussels and shellfish for sale.  
© Michel Gunther / WWF

# 1

## MAKE SURE YOUR SUPPLY CHAIN IS 100% TRACEABLE AND FREE FROM ILLEGAL FISHING PRODUCTS

There are many points along the supply chain where seafood traceability can become clouded. Not least, the practice of transshipping fish products at sea, which makes it difficult to identify the origins of fish products beyond this step in the chain. Data transparency from the point of capture to the final point of sale is critical, particularly along the value chain when products are processed, mixed and transported. Data transparency will help curb illegal and grey market trade, while also helping to meet increasing demand from consumers for transparency and food provenance to make better-informed purchasing decisions.

Removing IUU products from the seafood supply chain can be achieved by increasing digital traceability and transparency. If you are a retailer, ensure that suppliers provide all information behind their seafood products, including, at a minimum, the type of gear used to catch the fish, the area in which it was caught and the scientific name of the species. Be sure that your internal traceability system is robust. A regional sourcing policy can be a good first step to decrease the amount of intermediaries in your supply chain.<sup>1</sup>

# 2

## TURN HUMAN RIGHTS POLICIES INTO HUMAN RIGHTS PRACTICES TO TACKLE HUMAN TRAFFICKING AND SLAVERY

Consistent efforts are needed from all parts of the seafood production chain to improve your approach to human rights. These include innovative measures to address modern slavery and specific measures to protect migrant fishers from abuse, such as holding vessel owners accountable and ensuring adequate standards of due diligence and information reporting. The Publicly Available Specification (PAS) recommendations,<sup>2</sup> which advise working only with those suppliers that have verified decent working conditions, is a good tool to help industry adapt their due diligence and risk assessment systems to reduce chances of supplying fisheries products that come from persons who have been trafficked or enslaved.

# 3

## STOP SELLING ENDANGERED SPECIES

Surprisingly, species listed as endangered by the International Union for Conservation of Nature (IUCN) or included in NGO red lists indicating their threatened status are still found on store shelves today.<sup>3</sup> Awaiting strong political action to make the sale of such species illegal is simply immoral. Retailers and restaurants should heed scientific advice and remove endangered species from their lists of goods on offer.

# 4

## AN ECOLABEL IS NOT A UNIVERSAL REMEDY

Product certification for marine seafood and aquaculture, while a good first step towards sustainability, is not enough, as not everything is certifiable. Eco-labels for instance do not fully certify against social or economic issues. More comprehensive work with suppliers and fishers on specific projects is necessary to increase knowledge of the sector and empower better decisions for seafood products that fall within sustainable limits of the state of the resource.

<sup>1</sup> For instance for the UK Market see : British Retail Consortium (BRC), Environmental Justice Foundation (EJF) and WWF-UK (2015), *Advisory Note for the UK supply chain, on how to avoid Illegal, Unreported and Unregulated fisheries products*. For the French market see WWF (2016), *Guide à l'usage des professionnels pour lutter contre la pêche illégale*.

<sup>2</sup> EJF, Oceana, Pew, WWF, (2017), PAS 1550:2017 *Exercising due diligence in establishing the legal origin of seafood products and marine ingredients – Importing and processing – Code of practice*, BSI.

<sup>3</sup> IUCN red list : [www.iucnredlist.org](http://www.iucnredlist.org)



# WHAT YOU, THE CONSUMER, CAN DO RIGHT NOW!



Cooked seafood on display in a local market, Greece.  
© Milos Bicanski / WWF-UK

## 1

### EAT LESS BUT BETTER, MORE SUSTAINABLE SEAFOOD

Global consumption of seafood has more than doubled in the last 50 years,<sup>1</sup> with average consumption in the EU today falling at around 25 kilogrammes per person every year. For some EU Member States, the numbers are much higher, with annual per capita consumption standing around 35 kilogrammes. With the global population expected to reach 9 to 10 billion in 2050, this demand for seafood protein will only increase further. We must urgently decrease our consumption, particularly in developed countries where alternative proteins, vitamins and fatty acids are easily sourced from other foods, including legumes and vegetables.

## 2

### ASK WHERE YOUR FISH COMES FROM AND HOW IT WAS CAUGHT

When buying fish in restaurants, markets or grocery stores, ask where the fish comes from and how it was caught. A common answer to this question is often “from the ocean”. KEEP ASKING and do not buy or eat seafood without a clear answer. Restaurants, fishmongers and retailers often claim to have a sourcing policy, so perseverance in asking the question will bring more transparency. Fish from our ocean is unlike any other protein source: it is a common and renewable resource that belongs to all of us. Working together, we can meet our collective responsibility to ensure that seafood does not threaten the stability and the security of other regions and is harvested by means that keep our seas healthy and full of life.<sup>2</sup>

<sup>1</sup> FAO (2018), State of the World Fisheries and Aquaculture.

<sup>2</sup> To find the seafood guide for your country in the EU : <https://www.fishforward.eu/en/seafoodguides>



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ASK WHERE THE FISH COMES FROM AND HOW IT WAS CAUGHT.

Fresh seafood for sale at the old port fish market in Marseille, France  
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**OUR MISSION IS TO STOP  
DEGRADATION OF THE PLANET'S  
NATURAL ENVIRONMENT AND  
TO BUILD A FUTURE IN WHICH  
HUMANS LIVE IN HARMONY  
WITH NATURE.**



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