

Flags of convenience and hidden ownership:

EU-owned fishing vessels in high-risk jurisdictions



January 2026

Table of contents

■ Executive Summary	3	■ EU-owned vessels could undermine EU efforts to fish sustainably in non-EU waters	14
■ What is a flag of convenience?	5	■ The lack of investigations and sanctions for EU-owned vessels fishing in West Africa	15
■ How can FoCs facilitate IUU fishing?	5	■ High-risk fishing imports enter the EU market	16
■ The use of FoCs by EU citizens and companies	7	■ Recommendations	18
■ Methodology	9	■ Annex	20
■ Our analysis shows: At least 105 EU-owned vessels are flagged to FoCs, yellow-carded countries, or tax havens	10	■ References	21
■ Some FoC-flagged vessels land their catches in yellow-carded or FoC countries	12		

Credits

Suggested citation: Oceana. *Flags of convenience and hidden ownership: EU-owned fishing vessels in high-risk jurisdictions* (2026). 24 pp.

DOI Number: 10.5281/zenodo.18197951

Photos and illustrations: All photos are © OCEANA and © Shutterstock.

Cover photo: © Shutterstock.

Design: Yago Yuste.



Co-funded by
the European Union

Views and opinions expressed are however those of the author only and do not necessarily reflect those of the European Union or CINEA. Neither the European Union nor CINEA can be held responsible for them.

Executive Summary



The European Union (EU) is a global leader in efforts to combat illegal fishing. As one of the world's largest markets for seafood, and with a significant distant water fleet of at least 588 vessels when combining both EU-flagged and EU-owned vessels fishing outside EU waters, the EU plays a pivotal role in shaping how fisheries are managed and monitored internationally. But there is a blind spot. EU citizens and companies own fishing vessels that operate under non-EU flags, including 'flags of convenience' (FoCs), issued by states with weak monitoring, control,

and surveillance mechanisms or limited political or judicial will or capacity to enforce fisheries rules. These FoCs present high risks of non-compliance and illegal fishing. Because there is no clear obligation for EU citizens or companies to register ownership of such vessels with EU authorities, most remain hidden from public view. This lack of oversight allows profits from foreign fishing activities, including potentially illegal, unreported and unregulated (IUU) fishing, to flow back into the EU.

In this report, we examine EU-ownership of large-scale fishing vessels flagged to countries that have either been:

- identified by the EU as a non-cooperative jurisdiction for tax purposes;
- issued a warning ('yellow card') by the EU for failing to address IUU fishing; or
- are deemed a FoC by the International Transport Workers Federation (ITF).

We identified 105 presumed EU-owned^a vessels, flagged to 20 such high-risk countries. These vessels are owned by citizens or companies domiciled in 16 EU Member States, primarily in Spain, Portugal, Lithuania, and Sweden. Moreover, 33 of these vessels are authorised to export their catch to the EU.

The lack of transparency surrounding EU-owned vessels operating under FoCs, yellow-carded states, or tax havens poses clear risks of facilitating illegal and unsustainable fishing.

a. Vessel ownership data were retrieved from Lloyd's List Intelligence database, [Seasearcher](#), [2025, September 25]. Data may contain errors, meaning that ownership should only be presumed.

To ensure that EU citizens and companies do not profit from activities linked to IUU fishing, it is critical that the EU deliver on its Ocean Pact commitments to tackle FoCs and increase beneficial ownership transparency. To that end,

this report recommends that the European Commission and EU Member States adopt the following measures:



EU Member States should:

- Require citizens and companies to report any legal, beneficial, or financial interests in fishing vessels flagged to non-EU countries, to ensure proper implementation of the prohibition on supporting IUU fishing and on owning fishing vessels flagged to countries subject to an EU seafood trade ban or red card.
- Strengthen monitoring and enforcement mechanisms and proactively investigate ownership links between EU nationals and foreign-flagged vessels, prioritising those operating under FoCs or associated with IUU fishing risks.
- Exchange information with non-EU countries to identify EU citizens and companies involved in offences, and to share information on beneficial ownership and cases of non-compliance.
- Fully comply with beneficial ownership disclosure obligations in regional fisheries bodies that require such transparency provisions.



The European Commission should:

- Identify and publish an official list of FoC countries, while ensuring that the challenge of FoCs is also tackled in relevant EU listing systems, such as for high-risk jurisdictions with deficiencies for anti-money laundering and countering the financing of terrorism, non-cooperative jurisdictions for tax purposes, or non-cooperating countries in the fight against IUU fishing.
- Analyse options to restrict or prohibit EU nationals and companies from fully or partially owning fishing vessels operating under FoCs, including through joint ventures.
- Ensure that EU Member States establish reporting requirements for nationals with any legal, beneficial, or financial interests in fishing vessels flagged to non-EU countries, by promoting this through the DG MARE working group on the control of nationals, based on Member State obligations and existing EU IUU Fishing Regulation obligations.
- Develop a public register of EU companies with legal, beneficial, or financial interests in vessels flagged to non-EU countries.
- Initiate infringement procedures against Member States that repeatedly fail to stop their nationals from benefiting from IUU fishing or from vessels flagged to red-carded countries.



The European Commission and EU Member States should:

- Apply stricter import control rules (including verification checks) for catches originating from FoC jurisdictions.
- Actively advocate for global beneficial ownership data sharing in international fora and Regional Fisheries Management Organisations (RFMOs) as an essential tool to fight IUU fishing, including measures targeting the use of FoCs.
- Commit to adopting all ten principles of the Global Charter for Fisheries Transparency.

What is a flag of convenience?

A 'flag of convenience' (FoC) allows vessel owners to register their vessels under the flag of a country regardless of where the owner is based. FoC countries typically operate using open or lax registration rules with minimal nationality or residency requirements and often offer economic advantages such as lower tax rates, weak labour laws, and minimal administrative costs. For fishing companies, FoCs can also be associated with weak fisheries monitoring, control, and surveillance mechanisms, as well as limited political or judicial will or capacity to enforce fisheries rules and ensure accountability. Because registration is easy and oversight is weak, vessels may also frequently reflag between various FoCs to avoid scrutiny or sanctions. When used specifically to evade international fisheries rules, FoCs have also been referred to as 'flags of non-compliance'.¹ Registering a vessel in a FoC state can enable owners to circumvent the regulations and oversight of their home country and although international maritime law requires a 'genuine link' between a vessel and its flag,² this is not always enforced in practice.

There is no single definition of a FoC at a global or European level. The International Transport Workers' Federation (ITF) describes a FoC as

the flag used by a vessel registered in a country other than the country of its real ownership.³ When declaring a FoC, the ITF Fair Practices Committee considers several factors: the number of foreign-owned vessels, the state's social record regarding human and trade union rights, and its safety and environmental record. This aligns with other academic definitions, which define FoC vessels as those where beneficial ownership and control is found to be elsewhere than in the country whose flag the vessel is flying.⁴ Other studies have employed a model-based scoring system to identify FoCs, including indicators such as foreign ownership within a fleet; government control and corruption; and fidelity to the flag state territorial waters.⁵

Additionally, some FoC states also function as tax havens. They allow foreign companies to register their vessels and set up shell companies with nominee directors as registered owners. These states offer favourable fiscal regimes (including very low tax rates for non-domiciled investors) and corporate secrecy for companies that facilitate the creation of corporate structures that allow the owners of illegal, unreported and unregulated (IUU) fishing vessels to hide from authorities.⁶

How can FoCs facilitate IUU fishing?

Marine ecosystems, coastal communities, and those who depend on the ocean for food and livelihoods are under pressure from IUU fishing. IUU fishing violates conservation measures and international laws, accelerates environmental degradation, and undermines coastal economies. It is also closely linked to broader criminal activities, including tax fraud, money laundering, labour rights abuses,⁷ human trafficking, drugs and arms smuggling, and the illegal wildlife trade.^{8,9}

Seafood supply chains are also increasingly global in nature. Fish may traverse the world after being caught in one country's waters,



© OCEANA / Carlos Minguell

landed in a second or transferred to a cargo vessel at sea, processed in a third, and sold in yet another before reaching a consumer's plate. This complexity creates multiple entry points for illegally caught fish to be laundered with legally caught seafood products, making it difficult to trace both the origin of catches and the flow of associated profits.

FoCs play a central role in enabling these risks. Some illegal fishers purposefully register their vessels in FoC states to exploit weak enforcement and circumvent the regulations and oversight of their home countries.¹⁰ FoC registries also facilitate complex and opaque ownership structures that conceal the identities of beneficial owners.^{10,11} This allows vessel owners to maintain anonymity through shell companies, front companies, and nominee directors, rendering nearly impossible the identification of the beneficial owner(s) who ultimately control and profit from fishing operations. A C4ADS analysis found that more than 50% of IUU fishing networks investigated used shell or front companies.¹²



© OCEANA / Manuel Cornax

Law enforcement efforts to prosecute IUU fishing are hindered by these complex ownership structures.^{10,12} Investigations into vessels flagged to FoC states are complicated and often constrained by insufficient national resources and enforcement capacity,⁴ and by limited political or judicial will to address fisheries-related crimes. As a result, sanctions are often directed at operational figures such as captains or the legal shipowners listed on vessels' registration papers, while the beneficial owners who profit most from illegal fishing remain beyond reach and unpunished.

The use of FoCs not only facilitates IUU fishing, it also creates systemic vulnerabilities in global fisheries governance.

FoC-flagged vessels often operate in legal and regulatory grey areas, undermining enforcement mechanisms and the effectiveness of conservation and management efforts. For example, vessels owned by European and Asian companies use FoCs to fish for small pelagic species in West Africa. These stocks are heavily overfished and increasingly not fished for by EU-flagged vessels, because of inactive EU access agreements with countries in the region or quota limitations under those agreements. However, FoCs allow EU-owned, foreign-flagged vessels to continue to access these dwindling resources, circumventing control requirements and associated quota restrictions under the official EU agreements and undermining regional efforts to sustainably manage these resources.

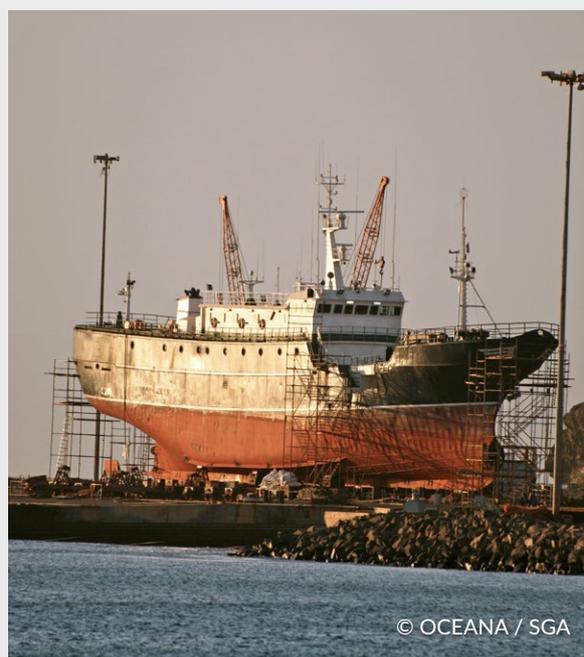
FoCs also weaken the effectiveness of Regional Fisheries Management Organisations (RFMOs), which depend on responsible coastal and flag states to implement conservation and management measures such as enforcing quotas, gear restrictions, and reporting requirements. Frequent reflagging further hampers authorities' ability to check a vessel's compliance history, including for EU port authorities when FoC-flagged vessels land directly in EU Member States.

How did FoCs help Vidal Armadores fish illegally?

In 2015, Spanish authorities conducted the largest IUU fishing investigation in Europe to date, and revealed that Spanish vessel owners were benefitting from IUU fishing practices through the use of FoCs. The Spanish fishing group Vidal Armadores indirectly owned multiple vessels that fished illegally for Patagonian toothfish (also known as Chilean seabass, *Dissostichus eleginoides*) in the Southern Ocean. These vessels regularly changed names and flags, benefiting from the lack of transparency offered by FoCs.¹³

The case of the vessel *Kunlun* (IMO: 7322897), for example, shows the scale of the profits that beneficial owners can derive from these shady practices. During the time that *Kunlun* was owned by Stanley Management Inc., a shell company based in Panama, the beneficial owner(s) were estimated to have earned EUR 81 million over five years from the catches of *Kunlun* and a sister vessel, *Yongding* (IMO: 9042001).^b In 2015, while fishing illegally in the Antarctic, *Kunlun* was flagged to Equatorial Guinea. According to Interpol, *Kunlun* had a long reflagging history, having previously operated under other FoCs, including Tanzania, North Korea, Panama, Sierra Leone, Uruguay, Indonesia, and Saint Vincent and the Grenadines.¹⁴

Frequent changes of vessel name and flag allowed *Kunlun* to hide its illegal fishing activities in the area governed by the Convention on the Conservation of Antarctic Marine Living Resources (CCAMLR) and to commercialise its catch while evading national and international controls at port.^{13,14} As a result of the investigation, Vidal Armadores was sanctioned by Spanish authorities with fines of up to EUR 17.8 million for IUU fishing and was banned from participating in fishing activities.¹⁵



The use of FoCs by EU citizens and companies

Many EU fishing companies have created subsidiary companies or joint fishing ventures in non-EU countries in order to access additional marine resources. To meet local ownership requirements imposed by some flag states, European owners often limit their declared ownership to a minority share while potentially retaining effective control through other mechanisms.

Although EU citizens and companies are prohibited from supporting IUU fishing or

owning fishing vessels (including as beneficial owners) flagged to countries subject to an EU seafood trade ban,¹⁶ they are not required to register their ownership with EU authorities. As a result, these links remain largely invisible to EU Member State authorities and therefore receive little scrutiny. This lack of oversight potentially allows profits from foreign fishing activities to enter Europe regardless of whether those activities are legal or sustainable, enabling activities linked to IUU fishing involving EU nationals to go undetected and

^b. (Guardia Civil, personal communication, n.d.).

undermining the full implementation of the EU IUU Fishing Regulation.¹⁶

A 2025 study by Kinds *et al.* at the University of Santiago de Compostela (USC), commissioned by Oceana, shows that fishing vessel ownership structures are often opaque.¹⁷ Beneficial owners, the individuals who ultimately control and profit from a vessel's operations, can remain hidden behind layers of complex corporate arrangements such as holding companies and shell entities. While the makeup of each vessel's ownership chain varies, they all begin with the registered owner, the entity listed in vessel registries. Ownership may then pass through several holding companies before reaching the top-tier parent company and ultimately ending with the beneficial owner(s).

The USC study, based on data from March 2024, found that citizens and companies in countries such as Russia, the United States, China, and South Korea, as well as EU Member States, are among the owners of large numbers of foreign-flagged fishing vessels worldwide.^c This widespread use of FoCs by nationals and companies in major fishing nations demonstrates a global governance issue rooted in ownership opacity, which facilitates illegality in fishing activities and threatens ocean sustainability and food sovereignty for millions of people.^{18,19} Therefore, a global effort to increase transparency and accountability in the fishing industry is crucial.

The European Ocean Pact commits the European Commission to tackling the challenge of FoCs and increasing transparency in fishing vessel ownership structures.²⁰ Combined with the ongoing European Commission study on the economic drivers of FoCs,²¹ which is due to be published imminently, this creates a critical window for EU action.

To help inform efforts to address this problem, Oceana carried out an analysis to identify EU-owned fishing vessels flagged to high-risk countries.

We aimed to shed light on the potential extent of the problem, recognising that because data on beneficial owners are limited, our assessment would provide only a very minimum estimate of the number of Member States and vessels involved.



- c. It is worth emphasising that the USC study relies on data from Orbis and Lloyd's List Intelligence and that data gaps were observed in the assessment of 7,000 commercial fishing vessels. For example, although this study found only 28 Chinese-owned, foreign-flagged vessels, evidence suggests that the Chinese-owned fleet operating under the flags of foreign countries, including FoCs, could total around 250 vessels.^{18,19}
- d. Seasearcher, vessel data, retrieved from Lloyd's List Intelligence, [2025, September 25]: <https://www.seasearcher.com>. Lloyd's List Intelligence does not warrant the accuracy, completeness or adequacy of this information, which is subject to the LLI Terms of Business found here: <https://www.lloydslistintelligence.com/legal/customer-terms-and-conditions>
- e. The EU 'carding' scheme is part of the EU's approach to ensuring cooperation and ongoing dialogue with non-EU countries in relation to IUU fishing. Under this scheme, a country found to be failing at fighting IUU fishing could be issued with a formal warning (or 'yellow card'), meaning it is pre-identified by the EU as a non-cooperating country. This warning commences a formal engagement between the EU and the yellow-carded country, in which the EU seeks to provide assistance in tackling the identified shortcomings. If sufficient action is not taken to improve performance, the non-EU country risks being identified as a non-cooperating country pursuant to the EU IUU Fishing Regulation (i.e. it receives a 'red card')¹⁶ – which prohibits fish caught by the red-carded country's registered vessels from being exported to the EU, among other restrictions.

Methodology

For this study, we used Lloyd's List Intelligence's [Seasearcher database](#). It is important to note that ownership data obtained from this database may contain inaccuracies. Therefore, vessel ownership throughout this study should only be presumed. Using data from September 2025,^d we developed a list of presumed EU-owned large-scale fishing vessels registered in 20 high-risk non-EU countries (see Table A1 in Annex). High-risk countries were defined as those that are considered FoCs by the ITF;²² are listed as non-cooperative jurisdictions for tax purposes by the EU²³; or have received a warning ('yellow card')^e under the EU IUU Fishing Regulation for failing to address IUU fishing.²⁴

To develop the list of FoC countries, we included countries identified as FoCs by the ITF. It is important to note that some countries may have been included on the ITF list due to failures to meet international requirements unrelated to fisheries, or due to incidents involving non-fishing or fishing supply vessels. Seven of these non-EU countries^f had already been identified by the USC study¹⁷ for their high numbers of foreign-owned vessels, including both EU-owned and non-EU owned vessels, which ranged from 25 vessels in Georgia to 92 vessels in Panama.

For the EU-owned vessels identified, we then analysed their apparent fishing patterns and port visits to determine fishing operational areas and landing locations, regardless of their flags. The analysis of these data allowed us to evaluate whether the use of FoCs gave EU-owned vessels access to Exclusive Economic Zones (EEZs) under conditions that differ from those of vessels flagged in

EU Member States, or where EU-flagged vessels are not authorised to fish. This analysis was possible only for vessels that broadcast Automatic Identification System (AIS) signals.^g AIS is a vessel tracking and communication system designed to provide a vessel's position, course, speed, and identity.²⁵ Using AIS information available on the Global Fishing Watch (GFW) platform,^h we tracked the activities of 44 vessels from January 2020 to September 2025.

Next, we assessed whether seafood caught by EU-owned vessels registered in FoCs, yellow-carded countries, or tax havens entered the EU market, by cross-checking these vessels against the list of non-EU authorised establishments in the European Commission's Traces NT database,²⁶ to determine whether they were authorised to export to the EU. We also extracted EU import data from the European Market Observatory for Fisheries and Aquaculture Products (EUMOFA) to quantify the volume and value of seafood imports that entered the EU market from the 20 identified high-risk countries.²⁷ Additionally, we assessed direct landings in EU ports by vessels flying the flags of FoC states, using the 2022-2023 biennial reports from Member States under the EU IUU Fishing Regulation.¹⁶ These reports were obtained by the EU IUU Fishing Coalition through an access-to-information request and are available on its website.²⁸

When combined, these datasets help to shed light on the use of FoCs by EU citizens and companies and allow for estimations of the potential volume of seafood imports reaching the EU market that may originate from high-risk countries for IUU fishing, overfishing, or other unethical practices.

f. These countries are Panama, Belize, Vanuatu, Senegal, Honduras, Georgia, and the Cook Islands.

g. It should be noted that multiple factors can occasionally interrupt AIS transmissions (e.g. technical problems, receiver failures, or signal range limitations). There are some cases when AIS can be legally turned off. According to EU's legislation on fisheries control, the master of a EU fishing vessel may switch off the AIS in exceptional circumstances when the master considers that the safety or security of the crew is imminently at risk of being compromised.²⁵

h. [Global Fishing Watch](#) is an international non-profit organisation dedicated to advancing ocean governance through increased transparency of human activity at sea. The views and opinions expressed in this report are those of the authors, which are not connected with or sponsored, endorsed, or granted official status by Global Fishing Watch. By creating and publicly sharing map visualizations, data and analysis tools, Global Fishing Watch aims to enable scientific research and transform the way our ocean is managed. Global Fishing Watch's public data was used in the production of this publication. Any and all references to "fishing" should be understood in the context of Global Fishing Watch's fishing detection algorithm, which is a best effort to determine "apparent fishing effort" based on vessel speed and direction data from the Automatic Identification System (AIS) collected via satellites and terrestrial receivers. As AIS data varies in completeness, accuracy, and quality, and the fishing detection algorithm is a statistical estimate of apparent fishing activity, therefore it is possible that some fishing effort is not identified and conversely, that some fishing effort identified is not fishing. For these reasons, GFW qualifies all designations of vessel fishing effort, including synonyms of the term "fishing effort," such as "fishing" or "fishing activity," as "apparent," rather than certain. Any/all GFW information about "apparent fishing effort" should be considered an estimate and must be relied upon solely at your own risk. GFW is taking steps to make sure fishing effort designations are as accurate as possible.

Our analysis shows:

At least 105 EU-owned vessels are flagged to FoCs, yellow-carded countries, or tax havens

Our analysis identified presumed ownership links between EU citizens and companies for 105 vessels flagged to 20 high-risk countries (Table 1). Of these vessels, 33 are authorised to export their catch directly to the EU. Given that previous reports already found no ownership information for 60% of fishing vessels investigated in commonly used databases, including Lloyd's List Intelligence,¹⁷ this figure is likely a conservative estimate of EU-owned vessels flagged to FoCs, yellow-carded countries, or tax havens.

These vessels are owned by citizens or companies domiciled in 16 EU Member States, with the highest numbers in Spain, Portugal, and Lithuania. Among these Member States, one nation clearly stands out: Spain. Overall, Spanish individuals and companies are the ultimate beneficiaries of 73 vessels that we identified as being flagged to FoCs, yellow-carded countries, or tax havens, including Senegal, Panama, and Ecuador.

Table 1. Ownership of vessels flagged in FoCs, yellow-carded countries, or tax havens, by EU Member State.

EU Member State where owner is based	FoC, yellow-carded country, or tax haven	Number of vessels owned	Total vessels for the EU Member State
 Belgium	 Belize	2	2
 Cyprus	 Equatorial Guinea	1	1
 Denmark	 Belize	1	2
	 Faroe Islands	1	
 Finland	 Russia	1	1
 Greece	 Honduras	2	3
	 Marshall Islands	1	
 Italy	 Mongolia	1	1
 Malta	 Bahamas	1	2
	 Mongolia	1	
 The Netherlands	 Faroe Islands	2	3
	 Tanzania	1	
 Portugal	 Panama	4	5
	 Sierra Leone	1	

(continued on the next page)

(continued from previous page)

EU Member State where owner is based	FoC, yellow-carded country, or tax haven	Number of vessels owned	Total vessels for the EU Member State
 Croatia	 Ecuador	1	1
 Estonia	 Belize	1	2
	 Honduras	1	
 Ireland	 Georgia	1	2
	 San Marino	1	
 Latvia	 Belize	1	1
 Lithuania	 Panama	1	5
	 Belize	1	
	 Georgia	1	
	 Guinea-Bissau	2	
 Spain	 Panama	15	73
	 Belize	9	
	 Vanuatu	1	
	 Senegal	21	
	 Honduras	3	
	 Sierra Leone	2	
	 Ecuador	7	
	 Curaçao	4	
	 Gabon	2	
	 Guinea-Bissau	1	
	 Mauritius	5	
	 Mongolia	1	
	 Tanzania	2	
 Sweden	 Mongolia	1	1

Source: Lloyd's List Intelligence^d

These findings are concerning since, if we consider the total of 344 EU-owned vessels operating under non-EU flags identified by the USC study, more than 30% were flagged in states that pose a threat of facilitating illegal and unsustainable fishing, fail to control their flagged vessels, or offer very low tax rates for non-domiciled investors.¹⁷ This high percentage suggests that EU citizens and companies are actively taking advantage of the chance to register in countries that are more likely to enable illegal, unethical, or opaque fishing practices. It is important to note, however, that our study used a different list of vessels than the one used by the USC study, so the specific vessels included in the two studies may vary.

The widespread use by EU nationals of FoCs and opaque ownership structures undermines the EU's zero-tolerance policy towards IUU

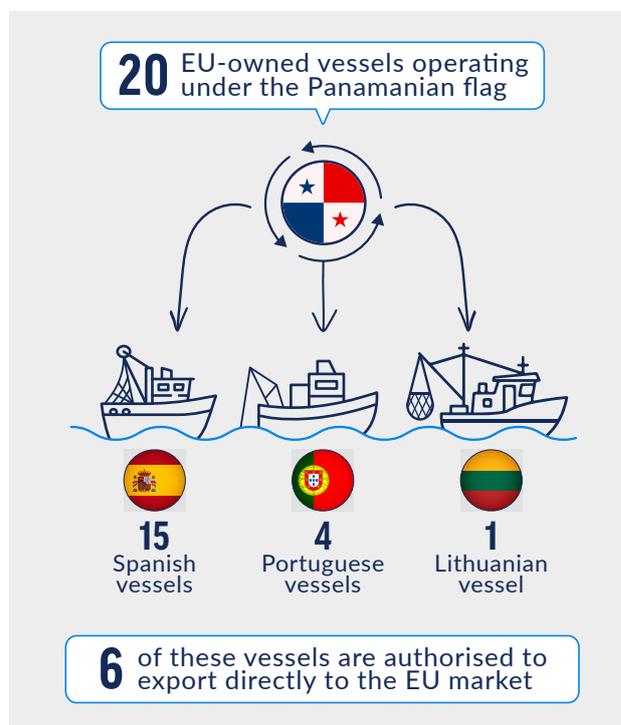
fishing. These practices may allow profits from potentially illegal or unethical activities to flow back to EU citizens and companies while allowing them to evade accountability.



Some FoC-flagged vessels land their catches in yellow-carded or FoC countries

Panama is one of the world's most widely recognised FoC countries and is also considered a tax haven by the EU.^{22,23,24} Its open registry imposes no nationality or residency requirements for vessel registration, allows opaque corporate ownership structures,²⁹ and charges very low registration fees; enforcement of international fisheries rules and labour laws is also known to be weak.³⁰ In December 2019, the EU awarded Panama a yellow card,ⁱ which it had also received previously in 2012,³¹ due to significant shortcomings in the monitoring of activities of its fishing vessels and refrigerated cargo vessels ('reefers') outside Panamanian waters and at fish processing facilities.³² In June 2025, Panama announced new legislation requiring ownership disclosure that could improve fisheries transparency in the near future.

We identified 20 EU-owned vessels operating under the Panamanian flag: 15 Spanish-owned vessels, four Portuguese vessels, and one Lithuanian vessel. Six of these 20 vessels are authorised to export directly to the EU market.



i. Panama received a previous yellow card by the EU in November 2012 for having vessels listed as IUU operators flying the Panamanian flag, not conducting sufficient investigations into these cases, and failing to implement international rules and to cooperate and enforce the IUU Fishing Regulation.³¹ This first yellow card was later lifted, in October 2014.³²

Using GFW data, we determined that five of these EU-owned vessels are purse seiners that apparently target tuna in the Pacific high seas, and occasionally in Ecuadorian waters. Despite being flagged to Panama, these vessels rarely visit Panamanian ports; instead, they land primarily in Ecuador, specifically in the ports of Manta and Posorja.

Ecuador is one of the EU's leading suppliers of tuna products, exporting approximately 185,000 tonnes of frozen and processed tuna to the EU in 2024. However, Ecuador was given a yellow card by the EU in 2019 due to serious deficiencies in its monitoring and control of tuna fishing and processing activities.³³ This warning reflected the fact that Ecuadorian law enforcement was being undermined by an outdated legal framework, inefficient sanctions, and a lenient attitude towards fishing infringements, conditions that facilitate the entry of products linked to IUU fishing into the supply chain. Any improvements that may have been made are not yet considered

sufficient by the EU, as institutional talks between the EU and Ecuador continue and the yellow card remains in place.³⁴

Given the weak control and enforcement in both Panama and Ecuador, fishing on the high seas under the Panamanian flag and landing in Ecuadorian ports creates opportunities to obscure the origin of catches, falsify paperwork, and bypass catch documentation checks required for EU-flagged vessels.

Moreover, eight EU-owned vessels are flagged to Ecuador. When looking at seafood trade flows, Ecuador is the largest exporter of tuna to the EU among all the FoC, yellow-carded, or tax haven countries we analysed. Despite this, in 2024, the EU imported 190,598 tonnes of seafood from Ecuador, valued at around EUR 905 million. Spain accounted for the largest share of these imports (81,185 tonnes) followed by the Netherlands, Germany, and Italy.

Example of a Spanish-owned vessel fishing under a FoC and landing in yellow-carded or FoC countries

A Spanish-owned purse seiner has been fishing under the Panamanian flag since 2004. Although officially linked to a Panamanian shipowner, its beneficial owner is presumed to be a Spanish-based company.^d

GFW data show that the vessel has neither operated in Panamanian waters nor frequented Panamanian ports since at least 2020. Instead, its apparent fishing operations have been concentrated on the other side of the Atlantic Ocean, in West Africa.

Since 2022, this purse seiner has apparently fished in the waters of Cape Verde, Guinea, Guinea-Bissau, Liberia, Mauritania, and Sierra Leone, while apparently using Port of Abidjan (Ivory Coast) and Dakar (Senegal) as its main landing ports. The use of a Panamanian flag already raises concerns about a lack of control, and these concerns are amplified by its connection to ports such as Dakar. Dakar is Senegal's main industrial fishing port, and Senegal received a yellow card from the European Commission in May 2024 partly due

to inadequate port controls over foreign fishing vessels, which pose risks to seafood traceability.³⁵

Weak flag-state oversight, enabled by the vessel's use of an FoC, and regular landings in a country that has already been identified by the EU as non-compliant due to inadequate port controls, create vulnerabilities to IUU fishing and the entry of unsustainable products into supply chains. These risks would be significantly lower under an EU flag, which requires stronger monitoring and reporting systems, and in compliant ports, with more rigorous inspection and catch-certificate verification processes.



EU-owned vessels could undermine EU efforts to fish sustainably in non-EU waters

The Belizean flag appears to be the fifth most common non-EU flag used by the EU fishing industry. Belize has long been considered a FoC, with at least 77% of its industrial fleet consisting of foreign operators.¹⁷ Several EU-owned pelagic trawlers were briefly flagged to Belize after repeatedly reflagging in short periods of time, including to Cameroon, a country that has received both an EU seafood trade ban and a yellow card for failing to address IUU fishing.³⁶ Belize itself received a red card in November 2013 due to a lack of flag-state control but had it removed in December 2014 after strengthening its fisheries governance framework to meet its international obligations as a flag state.^{37,38}

In our analysis, we identified 15 EU-owned vessels operating under Belize's flag, with owners based in Spain (nine vessels), Belgium (two vessels), Denmark (one vessel), Estonia (one vessel), Latvia

(one vessel), and Lithuania (one vessel). Only four of these vessels broadcast AIS signals. By analysing these AIS data, we discovered that these Belizean-flagged vessels regularly operate far from Belizean waters, ranging from the waters off Suriname to the North Atlantic and the Western Indian Ocean.

Especially relevant is the fact that three Belizean-flagged vessels were found apparently fishing in West African waters where EU-flagged vessels fish under Sustainable Fisheries Partnership Agreements (SFPAs) with non-EU countries. These EU-owned but Belizean-flagged vessels are therefore not subject to the same sustainability, labour, reporting and control requirements that apply to EU-flagged vessels fishing under SFPAs. This creates potential for EU nationals to circumvent sustainability obligations and possibly undermine EU efforts to promote responsible fishing practices in partner countries.

EU-owned, FoC-flagged vessels not subject to EU regulations

The pelagic trawler *Soley* (IMO: 8607270) illustrates how EU-owned vessels flagged in countries not subject to EU regulations bypass EU sustainability and control requirements. Built in 1989, *Soley* is currently flagged to Belize and owned by an EU company. The vessel apparently has been fishing in Mauritanian waters for more than a decade and appears to have no operation links to the Caribbean.

If this vessel pursued these Mauritanian fishing activities under an EU country flag, it would be subject to the EU's long-standing SFPAs with Mauritania³⁹, going back to 1987, under which EU-flagged vessels must comply with strict conditions, including fishing only surplus stocks, meeting labour and safety standards, carrying observers, and adhering to detailed reporting requirements. However, while operating under a Belizean flag, the trawler fishes for small pelagic species without having to comply with EU fisheries or social sustainability standards and without facing the same levels of monitoring and control as EU-flagged vessels. In response to inquiries from Oceana, the owner of *Soley*

stated that their activities are legal, transparent, and audited; they reject any suggestion that their vessel operates under a FoC flag with the intention of evading EU regulations.

This practice of EU fishing companies flagging vessels outside of the reach of EU regulations – whether intentionally or for business reasons – undeniably creates unfair competition for EU-flagged vessels fishing under an SFPAs that are dutifully complying with stricter sustainability, reporting, and transparency obligations.



The lack of investigations and sanctions for EU-owned vessels fishing in West Africa

EU-owned vessels operating under non-EU flags also apparently fish in areas managed by RFMOs, which regulate the exploitation of internationally shared fish stocks or areas. Many RFMO conservation and management measures are legally binding for member countries, and most RFMOs maintain lists of identified IUU fishing vessels. These lists are updated annually and prohibit listed vessels from fishing, transshipping, or landing catches within the RFMO's area of competence. Member countries are required to enforce these measures or face sanctions themselves, and this includes coastal states, as well as distant-water fishing nations with a historical presence or fishing interests in the RFMO convention areas.

The European Commission recently confirmed that EU citizens and companies are prohibited from engaging in or supporting IUU fishing, regardless of whether the vessels they are linked to appear on an RFMO IUU fishing vessel list.⁴⁰

However, some Member States, such as Spain, interpret their jurisdiction far more narrowly, claiming they can only investigate and sanction their citizens and companies fishing under a third-country flag when the vessel is formally included on an RFMO IUU fishing vessel list. While Spanish law provides one of the strongest legal frameworks for sanctioning nationals involved in IUU fishing, this power is currently only exercised for vessels included on RFMO IUU fishing vessel lists.^j The European Commission has confirmed that this restrictive interpretation contradicts EU law.⁴⁰

The problem is particularly acute in West Africa, where regional fisheries bodies responsible for pelagic and demersal species have only an advisory role and do not maintain IUU fishing



vessel lists. There are Spanish-owned vessels targeting demersal species in West Africa that remain effectively beyond the reach of Spanish authorities, even when engaging in conduct that would otherwise constitute an infringement. In addition, we identified at least 11 pelagic vessels from our list that are EU-owned and operate in this region under the flags of FoCs, yellow-carded countries, or tax havens.^d These vessels exploit weak flag-state enforcement and the absence of binding regional measures to fish with minimal risk of inspection or sanctions, contributing to the overexploitation of certain small pelagic species.

For example, five EU-owned vessels whose beneficial owners are reportedly based in Lithuania and Malta have repeatedly changed both flags and vessel names in recent years – being registered in Cameroon, Guinea-Bissau, and, most recently, The Gambia.⁴¹ Satellite data from GFW suggest that, despite registration changes, these vessels appeared to have consistently fished in Mauritania's waters. Between 2000 and 2024, they collectively logged over 33,500 active hours of apparent fishing within the Mauritanian EEZ. These EU-owned vessels may have repeatedly reflagged in order to access small pelagic fish stocks in Mauritanian waters while bypassing stricter registration processes in Mauritania.

j. The Spanish administration has already faced this issue when attempting to sanction Spanish companies that owned stateless vessels fishing without a licence or flag. As these vessels were not included on any IUU vessel list, the National Court overturned the sanctioning resolutions in Cases 81/2017 and 82/2017, despite the fact that the vessels were clearly fishing illegally and in contravention of all national, European, and international legislation.

High-risk fishing imports enter the EU market

Almost 70% of the seafood consumed in the EU is imported, including products originating from countries at a high risk of illegal fishing.⁴² Despite the EU's strong transparency and sustainability commitments, a large proportion of the fish products consumed in the EU originate from countries that are classified as FoCs, are yellow-carded under the EU IUU Fishing Regulation, or are recognised as tax havens.

Of the 20 high-risk countries identified in this study, 15 exported seafood to the EU in 2024, accounting for 601,732 tonnes of seafood imports (Table 2). This represents more than 10% of estimated total EU seafood imports, based on the 2023 import estimate of 5.9 million tonnes.⁴²

Table 2. Total 2024 seafood imports into the EU from the top ten high-risk countries, by volume, value, and the main associated importing EU Member States (listed in decreasing order, by import volumes).

Top high-risk countries identified in the study	Total Import Volume ^k (tonnes)	Total Import Value (million EUR)	Top EU Member State importers
 Russia	208,846	764.24	Germany, the Netherlands, Poland, France, Portugal, Denmark, Spain, Italy, Lithuania, Czech Republic
 Ecuador	190,598	905.42	Spain, the Netherlands, Germany, Italy, France, Portugal, Belgium, Greece
 Faroe Islands	109,458	695.03	Denmark, the Netherlands, Germany, Poland, Latvia
 Mauritius	34,685	173.26	Spain, the Netherlands, Italy, France, Sweden, Finland
 Senegal	22,998	171.62	Spain, Italy, France, Portugal, Greece
 Tanzania	15,060	80.83	Spain, the Netherlands, Italy, Portugal, Belgium, Romania
 Belize	10,730	28.51	Spain, Portugal
 Honduras	4,793	45.39	France, Germany, Belgium, Spain, the Netherlands
 Panama	3,997	9.40	Spain, France
 Bahamas	567	20.38	Belgium, France, Spain

Source: EUMOFA²⁷

Several of the countries with the highest numbers of EU-owned vessels, such as Panama, Belize, Senegal, and Ecuador, are also major exporters of seafood to the EU. This overlap suggests the potential involvement of EU beneficial owners operating from jurisdictions with weak fisheries controls, inadequate labour protections, or permissive tax regimes, thereby increasing the risk of IUU-derived or unethical products entering EU supply chains.

The use of FoCs is also evident in direct landings in EU ports. Spain and the Netherlands reported 137,138 tonnes of landings in 2023 by vessels and reefers^l registered in FoC states (Table 3).^{43,44}

In the case of the Netherlands, this is particularly concerning as the country has been subject to an ongoing infringement procedure by the European Commission since 2022 for failing to check the weight of landed fish.⁴⁵ Biennial reports show that

k. Note that the total volume and value could include species that are not wild-caught.

l. Refrigerated cargo ships, also known as reefers, are commonly used to transfer and transport frozen fish catches from fishing vessels, allowing fishing vessels to avoid long trips back to port and increase efficiency. While this practice is often legal commercial fishing, it is also vulnerable to abuse, as it can hide IUU fishing, human rights abuses, and other criminal activities because it occurs in remote locations.

the Netherlands did not meet the minimum 5% inspection threshold for direct landings in any year between 2020 and 2023.⁴⁶ In the case of Spain, over 70% of direct landings were inspected during the same period.⁴⁶

These patterns indicate that FoC-linked risks extend far beyond foreign fishing operations and may be embedded directly within EU supply chains and landing ports.

Table 3. Landings in EU ports by vessels flagged in high-risk countries in 2023, by species and volume.

EU Member State	High-risk flag	Volume of landings (tonnes)	Species
 Spain	 Belize	180	Bigeye tuna
		2,692	Skipjack tuna
		408	Argentine shortfin squid
		2,702	Yellowfin tuna
	 Mauritius	488	Skipjack tuna
		640	Yellowfin tuna
	 Panama	377	Bigeye tuna
		2,025	Skipjack tuna
		4,683	Yellowfin tuna
	 Russia	302	Atlantic cod
		303	Greenland halibut
		517	Argentine hake
		1,530	Atlantic redfishes
 The Netherlands	 Bahamas (reefer) - Russian catch	4,603	Alaska pollock
		3,775	Atlantic cod
		5,939	Pollack
	 Faroe Islands	1,254	Atlantic mackerel
	 Norway (reefer) - Faroe Islands catch	1,608	Atlantic herring
		370	Atlantic mackerel
	 Norway (reefer) - Russian catch	15,942	Atlantic cod
		1,657	Haddock
		701	European plaice
		445	Atlantic mackerel
	 Senegal	53	Atlantic herring
	 Panama (reefer) - Russian catch	3,746	Pollack
		 Russia (reefer) - Russian catch	62,590
	14,582		Haddock
1,250	Pollack		
989	European plaice		
787	American plaice		

Source: Biennial reports from Spain and the Netherlands on the application of the IUU Regulation.^{43,44}



Recommendations

As the world's largest importer of seafood products, importing almost 70% of the seafood it consumes,⁴² and home to one of the largest fishing fleets, the EU has a responsibility to promote transparency in fishing vessel ownership worldwide. The EU must also lead by example, ensuring that its own nationals are not involved in illegal activities, under any country's flag. Ensuring clarity on who ultimately owns and controls foreign-flagged vessels is essential to enforcing the EU zero-tolerance policy towards IUU fishing and protecting EU consumers and coastal communities worldwide.

This study shows that EU-owned vessels make extensive use of flags from FoC, yellow-carded, and tax haven jurisdictions. At least 105 EU-owned vessels fish under the flags of 20 such

high-risk countries, which represents over 30% of all EU-owned vessels flying non-EU flags. This high-risk ownership pattern, combined with a lack of transparency in fisheries governance, can allow European companies to profit from IUU and unsustainable fishing activities, and facilitates the entry of IUU-derived or unethical fishery products into the EU market in contravention of EU policy.

Improving beneficial ownership transparency is therefore vital for detecting and deterring IUU fishing and ensuring the consistent enforcement of EU law and RFMO rules. To operationalise the commitments of the European Ocean Pact to tackle the issue of FoCs, Oceana call on the European Commission and EU Member States to take the actions detailed below.



EU Member States should:

- Require citizens and companies to report any legal, beneficial, or financial interests in fishing vessels flagged to non-EU countries, to ensure proper implementation of the prohibition on supporting IUU fishing and on owning fishing vessels flagged to countries subject to an EU seafood trade ban or red card.
- Strengthen monitoring and enforcement mechanisms and proactively investigate ownership links between EU nationals and foreign-flagged vessels, prioritising those operating under FoCs or associated with IUU fishing risks.
- Exchange information with non-EU countries to identify EU citizens and companies involved in offences, and to share information on beneficial ownership and cases of non-compliance.
- Fully comply with beneficial ownership disclosure obligations in regional fisheries bodies that require such transparency provisions.



The European Commission should:

- Identify and publish an official list of FoC countries, while ensuring that the challenge of FoCs is also tackled in relevant EU listing systems, such as for high-risk jurisdictions with deficiencies for anti-money laundering and countering the financing of terrorism, non-cooperative jurisdictions for tax purposes, or non-cooperating countries in the fight against IUU fishing.
- Analyse options to restrict or prohibit EU nationals and companies from fully or partially owning fishing vessels operating under FoCs, including through joint ventures.

Ensure that EU Member States establish reporting requirements for nationals with any legal, beneficial, or financial interests in fishing vessels flagged to non-EU countries, by promoting this through the DG MARE working group on the control of nationals, based on Member State obligations and existing EU IUU Fishing Regulation obligations.

- Develop a public register of EU companies with legal, beneficial, or financial interests in vessels flagged to non-EU countries.
- Initiate infringement procedures against Member States that repeatedly fail to stop their nationals from benefiting from IUU fishing or from vessels flagged to red-carded countries.



The European Commission and EU Member States should:

- Apply stricter import control rules (including verification checks) for catches originating from FoC jurisdictions.
- Actively advocate for global beneficial ownership data sharing in international fora and RFMOs as an essential tool to fight IUU fishing, including measures targeting the use of FoCs.
- Commit to adopting all ten principles of the Global Charter for Fisheries Transparency.

Annex

Table A1. List of the 20 countries identified as high-risk in this study, either for being considered a FoC,²² having received a yellow card under the EU IUU Fishing Regulation,²⁴ or being listed as a non-cooperative jurisdiction for tax purposes by the EU²³, with the number of identified presumed EU-owned vessels operating under those flags.

High-risk country identified in the study	Reason for being identified as a high-risk country	Number of identified EU-owned vessels (updated September 2025)
 Senegal	FoC / Yellow card	21
 Panama	FoC / Yellow card / EU tax haven	20
 Belize	FoC	15
 Ecuador	Yellow card	8
 Honduras	FoC	6
 Mauritius	FoC	5
 Curaçao	FoC	4
 Mongolia	FoC	4
 Sierra Leone	Yellow card / FoC	3
 Faroe Islands	FoC	3
 Guinea-Bissau	FoC	3
 Tanzania	FoC	3
 Georgia	FoC	2
 Gabon	FoC	2
 Vanuatu	FoC / EU tax haven	1
 Russia	EU tax haven	1
 Marshall Islands	FoC	1
 Bahamas	FoC	1
 Equatorial Guinea	FoC	1
 San Marino	FoC	1

Source: ITF,²² Council of the European Union,²³ and Directorate-General for Maritime Affairs and Fisheries.²⁴

References

- 1 Miller, D. D., & Sumaila, U. R. (2014). Flag use behavior and IUU activity within the international fishing fleet: Refining definitions and identifying areas of concern. *Marine Policy*, 44, 204–211. <https://doi.org/10.1016/j.marpol.2013.08.027>
- 2 United Nations. (1982). *United Nations Convention on the Law of the Sea*. https://www.un.org/depts/los/convention_agreements/texts/unclos/unclos_e.pdf
- 3 International Transport Workers' Federation. (n.d.). *Flags of Convenience*. <https://www.itfseafarers.org/en/issues/flags-of-convenience>
- 4 Petrossian, G. A., Sosnowski, M., Miller, D., & Rouzbahani, D. (2020). Flags for sale: An empirical assessment of flag of convenience desirability to foreign vessels. *Marine Policy*, 116, 103937. <https://doi.org/10.1016/j.marpol.2020.103937>
- 5 Ford, J. H., & Wilcox, C. (2019). Shedding light on the dark side of maritime trade – A new approach for identifying countries as flags of convenience. *Marine Policy*, 99, 298-303. <https://doi.org/10.1016/j.marpol.2018.10.026>
- 6 Galaz, V., Crona, B., Dauriach, A., Jouffray, J-B., Österblom, H., & Fichtner, J. (2018). Tax havens and global environmental degradation. *Nature Ecology and Evolution*, 2, 1352-1357. <https://doi.org/10.1038/s41559-018-0497-3>
- 7 Decker Sparks, J. L., & Hasche, L. K. (2019). Complex linkages between forced labor slavery and environmental decline in marine fisheries. *Journal of Human Rights*, 18(2), 230-245. <https://doi.org/10.1080/14754835.2019.1602824>
- 8 Wyatt, T. (2021). *Wildlife trafficking: A deconstruction of the crime, victims and offenders*. Springer Nature. <https://doi.org/10.1057/9781137269249>
- 9 Haenlein, C. (2017). *Below the surface: How illegal, unreported and unregulated fishing threatens our security*. Royal United Services Institute. https://static.rusi.org/201707_rusi_below_the_surface_haenlein.pdf
- 10 Trygg Mat Tracking (TMT) & C4ADS. (2020). *Spotlight on the exploitation of corporate structures by illegal fishing operators*. <https://c4ads.org/wp-content/uploads/2020/12/TMT-C4ADS-Spotlight.pdf>
- 11 North Atlantic Fisheries Intelligence Group. (2017). *Chasing Red Herrings: Flags of Convenience, Secrecy and the Impact on Fisheries Crime Law Enforcement*. Nordic Council of Ministers. <https://norden.diva-portal.org/smash/get/diva2:1253427/FULLTEXT01.pdf>
- 12 C4ADS. (2019). *Strings Attached: Exploring the Onshore Networks Behind Illegal, Unreported & Unregulated Fishing*. <https://c4ads.org/wp-content/uploads/2019/08/StringsAttached-Report.pdf>
- 13 Ministerio de Agricultura, Alimentación y Medio Ambiente. (2016, March 18). *Operación Yuyus: La Guardia Civil desarticula un importante grupo dedicado a la pesca ilegal en la Antártida* [Press release]. <https://www.mapa.gob.es/dam/mapa/contenido/actuaciones-del-seprona/noticias/pdf/npoperacionyuyus-seprona-interpol.pdf>
- 14 Indian Ocean Tuna Commission (IOTC). (2015, April 18). *Complementary elements for discussion under item 7 of the agenda for the Compliance Committee*. IOTC-2015-CoC12-08a Rev4[E]. IOTC Secretariat. <https://openknowledge.fao.org/server/api/core/bitstreams/b63b20f2-f056-442d-a2b1-5deaca5ce933/content>
- 15 Planelles, M. (2016, March 17). 17,8 millones de multa para el gran 'pirata' gallego de la pesca. *El País*. https://elpais.com/politica/2016/03/17/actualidad/1458232512_746176.html
- 16 Council Regulation (EC) No 1005/2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing, amending Regulations (EEC) No 2847/93, (EC) No 1936/2001 and (EC) No 601/2004 and repealing Regulations (EC) No 1093/94 and (EC) No 1447/1999. <http://data.europa.eu/eli/reg/2008/1005/oj>

- 17 Kinds, A., Relano, V., & Villasante, S. (2025). *Beyond the Flag State Paradigm: Reconstructing the World's Large-Scale Fishing Fleet through Corporate Ownership Analysis*. Oceana. <https://zenodo.org/records/15476309>
- 18 Environmental Justice Foundation. (2023). *China's hidden fleet in West Africa: A spotlight on illegal practices within Ghana's industrial trawl sector*. <https://ejfoundation.org/reports/chinas-hidden-fleet-in-west-africa-a-spotlight-on-illegal-practices-within-ghanas-industrial-trawl-sector>
- 19 The Outlaw Ocean Project. (n.d.). *China's flagged-in fleet*. <https://theoutlawocean.com/investigations/china-the-superpower-of-seafood/chinas-flagged-in-fleet/>
- 20 European Commission. (2025). *Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. The European Ocean Pact*. COM(2025) 281 final. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52025DC0281>
- 21 European Climate, Infrastructure and Environment Executive Agency. (2023, July 5). *New EMFAF call for tender for study on the practice of open registers for vessels*. European Commission. https://cinea.ec.europa.eu/news-events/news/new-emfaf-call-tender-study-practice-open-registers-vessels-2023-07-05_en
- 22 International Transport Workers' Federation (ITF). (n.d.). *Current registries listed as FOCs*. <https://www.itfseafarers.org/en/issues/flags-of-convenience/current-registries-listed-focs#:~:text=Breadcrumb,Vanuatu>
- 23 Council of the European Union. (2025, February 18). *EU list of non-cooperative jurisdictions for tax purposes*. <https://www.consilium.europa.eu/en/policies/eu-list-of-non-cooperative-jurisdictions/>
- 24 Directorate-General for Maritime Affairs and Fisheries. (2023). *Illegal fishing: Overview of existing procedures with third countries*. European Commission. https://oceans-and-fisheries.ec.europa.eu/document/download/dac17bdf-42cf-4525-884c-44050b31d6a0_en?filename=illegal-fishing-overview-of-existing-procedures-third-countries_en.pdf
- 25 Regulation (EU) 2023/2842 of the European Parliament and of the Council of 22 November 2023 amending Council Regulation (EC) No 1224/2009, and amending Council Regulations (EC) No 1967/2006 and (EC) No 1005/2008 and Regulations (EU) 2016/1139, (EU) 2017/2403 and (EU) 2019/473 of the European Parliament and of the Council as regards fisheries control. <http://data.europa.eu/eli/reg/2023/2842/oj>
- 26 Directorate-General for Health and Food Safety. (n.d.). *Establishment lists - TRACES NT*. European Commission. <https://webgate.ec.europa.eu/tracesnt/directory/listing/establishment/publication/index>
- 27 European Market Observatory for Fisheries and Aquaculture Products. (n.d.). *Weekly EU import*. <https://eumofa.eu/weekly-eu-import>
- 28 EU IUU Fishing Coalition. (n.d.). *Member State implementation of the IUU Regulation*. <https://www.iuuwatch.eu/the-iuu-regulation/member-state-implementation/>
- 29 Oceana. (2025). *The EU's hidden fishing fleet: How foreign vessel ownership is undermining Europe's fight against illegal fishing*. <https://europe.oceana.org/wp-content/uploads/sites/26/2025/06/The-EUs-hidden-fishing-fleet-Oceana.pdf>
- 30 MarFishEco., Kuruc, M., & Porterfield, E. (2024). *A Global Charter for Fisheries Transparency. A framework for collaboration, justice, and sustainability*. The Coalition for Fisheries Transparency. <https://fisheriestransparency.net/wp-content/uploads/2024/09/2024-Charter-Report-EN.pdf>
- 31 European Commission. (2012). *Commission Decision of 15 November 2012 on notifying the third countries that the Commission considers as possible of being identified as non-cooperating third countries pursuant to Council Regulation (EC) No 1005/2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing*. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=oj:JOC_2012_354_R_0001_01

- 32 European Commission. (2020). *Commission Decision of 12 December 2019 on notifying the Republic of Panama of the possibility of being identified as a non-cooperating third country in fighting illegal, unreported and unregulated fishing*. (2020/C 13/06). [https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32020D0115\(01\)](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32020D0115(01))
- 33 European Commission. (2019, October 30). *Questions and answers: Illegal, unreported and unregulated (IUU) fishing and issues at stake in Ecuador*. https://ec.europa.eu/commission/presscorner/detail/en/qanda_19_6037
- 34 Avilés, M. F. (2025, November 6). Ecuador prevé superar la sanción pesquera de la Unión Europea en 2026. *El Diario*. <https://www.eldiario.ec/ecuador/ecuador-preve-superar-la-sancion-pesquera-de-la-union-europea-en-2026-06112025/>
- 35 European Commission. (2024, May 27). *Commission notifies Senegal of need to step up fight against illegal, unreported and unregulated fishing* [Press release]. European Commission. https://ec.europa.eu/commission/presscorner/detail/en/ip_24_2848
- 36 European Commission. (2021, February 17). *Fighting against illegal, unreported and unregulated fishing: Commission notifies Cameroon with a yellow card* [Press release]. European Commission. https://ec.europa.eu/commission/presscorner/detail/en/ip_21_621
- 37 *Council Implementing Decision of 15 December 2014 amending Implementing Decision 2014/170/EU establishing a list of non-cooperating third countries in fighting IUU fishing pursuant to Regulation (EC) No 1005/2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing as regards Belize*. (2014/914/EU). http://data.europa.eu/eli/dec_impl/2014/914/oj
- 38 EU IUU Fishing Coalition. (2025). *Driving Improvements in Fisheries Governance Globally: Impact of the EU IUU Carding Scheme on Belize, Guinea, Solomon Islands and Thailand*. <https://www.iuuwatch.eu/wp-content/uploads/2022/03/2022-EU-IUU-Coalition-Carding-Study.pdf>
- 39 European Union. (2021, December 8). *Partnership Agreement on Sustainable Fisheries Between the European Union and the Islamic Republic of Mauritania*. http://data.europa.eu/eli/agree_internation/2021/2123/oj
- 40 European Parliament. (2025, June 11). *Answer given by Mr Kadis on behalf of the European Commission*. E-001562/2025(ASW). https://www.europarl.europa.eu/doceo/document/E-10-2025-001562-ASW_EN.pdf
- 41 Oceana. (2025). *Why transparency matters: Exposing EU ownership of high-risk fishing vessels in Guinea-Bissau*. <https://europe.oceana.org/wp-content/uploads/sites/26/2025/02/BRIEFING-WHY-TRANSPARENCY-MATTERS-GUINEA-BISSAU.pdf>
- 42 European Market Observatory for Fisheries and Aquaculture Products. (2024). *The EU fish market: 2024 edition*. European Commission. https://eumofa.eu/documents/20124/145239/EFM2024_EN.pdf
- 43 Ministerio de Agricultura, Pesca y Alimentación. (2024). *Biennial report on the application of the IUU Regulation*. <https://www.iuuwatch.eu/wp-content/uploads/2024/09/SPAIN-Biennial-report-2022-2023.pdf>
- 44 The Netherlands Food and Consumer Products Safety Authority. (2024). *Biennial report on the application of the IUU Regulation*. <https://www.iuuwatch.eu/wp-content/uploads/2024/09/NETHERLANDS-Biennial-report-2022-2023.pdf>
- 45 European Commission. (2022, February 9). *February infringements package: key decisions*. https://ec.europa.eu/commission/presscorner/detail/en/inf_22_601
- 46 EU IUU Fishing Coalition. (2025). *Beyond CATCH: Why EU import controls still fail to keep illegal seafood out of the market*. <https://www.iuuwatch.eu/wp-content/uploads/2025/10/Beyond-Catch-EU-IUU-Fishing-Coalition-briefing-2025-EN.pdf>



OCEANA IN EUROPE

European Headquarters:
Madrid, Spain
europe@oceana.org

Baltic and North Sea Office:
Copenhagen, Denmark
copenhagen@oceana.org

European Union Office:
Brussels, Belgium
brussels@oceana.org

europe.oceana.org

 **OCEANA**