

# Illegal, Unreported and Unregulated Fishing and the European Green Deal

Advancing the Farm to Fork Strategy

September 2020



© WWF | Chris Gomersall



---

**The European Green Deal presents the European Union's (EU) goal of making the EU climate neutral by 2050. One of its key pillars is the 'EU Farm to Fork Strategy', which lays out the Commission's roadmap towards a healthier, more resilient and sustainable EU food system.**

This brief examines the central role that the effort to combat illegal, unreported and unregulated (IUU) fishing plays in advancing the Farm to Fork Strategy. It describes how prioritising action on IUU fishing would be an impactful and cost-effective way for the Commission to support a shift to sustainable fish and seafood production, given that the technologies and governance measures required are already tested, available, many of them can be implemented at relatively little or no cost and have proven to be effective deterrents where implemented effectively. Furthermore, prioritising IUU fishing would also generate the global economy billions in previously lost revenue, while advancing efforts to restore biodiversity, boost food security and protect livelihoods in the EU and beyond.

The EU can lead by example in the transition to a sustainable food system by prioritising its “zero tolerance” approach to IUU fishing, not only in its own waters but internationally. Within the EU, it can promote policy coherence across measures to tackle IUU fishing at EU and Member State level and mainstream the concept of sustainability in commercial fishing policies under the forthcoming framework for a sustainable food system. As the world's largest trader of fishery products, it can also incentivise international action on IUU fishing through trade agreements and through global summits such as the 2021 UN Food Systems Summit. Beyond this, the EU can also make the fight against IUU fishing a priority in the programming guidance for cooperation with third countries for 2021-2027.



---

## IUU fishing: The weak link in a sustainable food chain

Fish and seafood are important components of the global food chain; millions of people rely on it for nutrition. The United Nations (UN) estimates that it provides the global population with about 17% of their intake of animal protein, increasing to nearly 20% for 3.2 billion people.<sup>1</sup> In the EU, each citizen is estimated to have eaten over 24 kilogrammes of fish and seafood in 2017 on average, of which 18 kilogrammes originated from wild catches.<sup>2</sup> With an apparent consumption of fishery products at 9.2 million tonnes (aquaculture excluded), the bloc is reliant on imports to meet about 60% of its overall demand.<sup>3</sup> However, the EU's import needs for 2017 increased to an average 87% for the top-5 species consumed (tuna, cod, salmon, Alaska pollock and shrimp).<sup>4</sup> Therefore, to ensure that EU supply chains are sustainable overall, the Farm to Fork Strategy must have a global reach.

With estimates indicating that one third of world fisheries are currently overfished,<sup>5</sup> sustainability measures need to address overfishing in order to be effective. Combating overfishing requires tackling IUU fishing. This is because the clandestine nature of IUU fishing subverts efforts by coastal States and Regional Fisheries Management Organisations (RFMOs) to regulate catches in their waters and thereby obstructs sustainable fisheries management. With estimates that as many as one in five fish are caught illegally,<sup>6</sup> rising to half in some hotspots, such as the Gulf of Guinea,<sup>7</sup> policy makers cannot significantly contribute to sustainability measures until action on IUU fishing is prioritised and more accurate quantifications of its extent are developed.

Increased action to end IUU fishing would contribute to the attainment of the UN Sustainable Development Goals (SDGs). By depleting a vital source of food and incomes, IUU fishing currently undermines Goal 12 (responsible consumption and production), and frustrates efforts to end poverty, eradicate hunger, improve health and well-being and to conserve and sustainably use the oceans, seas and marine resources. Developing countries that depend on fisheries for food security and export income are often those most targeted by IUU fishing operations. In West Africa, a region within which a number of nations including Ghana, the Ivory Coast and Senegal are permitted to export to the EU,<sup>8</sup> total catches are estimated to be 40 percent higher than reported catches.<sup>9</sup> By agreeing to SDG 14.4 to end IUU fishing and overfishing by 2020, countries have acknowledged the importance of combating IUU fishing.

**Ending IUU fishing would help restore sustainable fish stocks, thereby increasing a vital source of healthy food for the European and global community, while protecting the environment and preserving biodiversity and contributing to the attainment of the UN SDGs.**

## IUU fishing and sustainable growth

The EU is the largest seafood market in the world (34% in terms of value globally).<sup>10</sup> In 2014, the latest year for which data is available, its citizens spent €52.3 billion on seafood.<sup>11</sup> With imports from non-EU countries valued at over €26 billion in 2018, the EU plays a pivotal role in the sector and ensuring its long-term sustainability is critical to its economy.<sup>12</sup>

---

1 <http://www.fao.org/3/ca9229en/CA9229EN.pdf>

2 [https://ec.europa.eu/fisheries/press/eu-fish-market-2019-edition-out-everything-you-wanted-know-about-eu-market-fish-and-seafood\\_en](https://ec.europa.eu/fisheries/press/eu-fish-market-2019-edition-out-everything-you-wanted-know-about-eu-market-fish-and-seafood_en)

3 *ibid.*

4 European Market Observatory for Fisheries and Aquaculture Products, The EU Fish Market, 2019 edition

5 <http://www.fao.org/3/ca9229en/CA9229EN.pdf>

6 Agnew, D.J., Pearce, J., Pramod, G., Peatman, T., Watson, R., Beddington, J.R. and Pitcher, T.J. (2009) 'Estimating the worldwide extent of illegal fishing', PLoS ONE 4(2).

7 Africa Progress Panel (2014) Grain, fish, money: financing Africa's green and blue revolutions. Africa Progress Report 2014.

8 [https://webgate.ec.europa.eu/sanco/traces/output/non\\_eu\\_listsPerActivity\\_en.htm#](https://webgate.ec.europa.eu/sanco/traces/output/non_eu_listsPerActivity_en.htm#)

9 Agnew, D.J., Pearce, J., Pramod, G., Peatman, T., Watson, R., Beddington, J.R. and Pitcher, T.J. (2009) 'Estimating the worldwide extent of illegal fishing', PLoS ONE 4(2).

10 Food and Agriculture Organization of the United Nations, 2020 The State of World Fisheries and Aquaculture.

11 [https://www.eumofa.eu/documents/20178/314856/EN\\_The+EU+fish+market\\_2019.pdf](https://www.eumofa.eu/documents/20178/314856/EN_The+EU+fish+market_2019.pdf)

12 *ibid.*



IUU fishing robs the global economy of up to €21 billion every year, representing 26 million tonnes of fish.<sup>13</sup> These losses substantially increase when impacts across the fish value chain are considered.<sup>14</sup> It also perpetuates other transnational crimes such as tax evasion, human trafficking, debt bondage and the drugs trade.<sup>15/16</sup>

The problem of IUU fishing is so acute that it presents a significant obstacle in the transition towards sustainable food systems and poses a direct threat to food security by undermining efforts to conserve and sustainably manage fish stocks. The huge quantities of fish being harvested through IUU means puts law-abiding fishers at a disadvantage as they compete for stock within the boundaries set by the Common Fisheries Policy (CFP). The Commission has acknowledged that, where fishing has become sustainable, income has grown in parallel.<sup>17</sup> It estimates that conserving marine stocks could increase annual profits of the seafood industry by more than €49 billion.<sup>18</sup>

**Ending IUU fishing would be one of the most impactful and cost-effective ways to advance the transition to a more robust, resilient and sustainable seafood chain, while saving billions in revenue robbed from economies every year. By facilitating an increase in fish abundance, it would support law abiding fishers, bolster incomes and food security.**



© Oceana

13 Agnew, D.J., Pearce, J., Pramod, G., Peatman, T., Watson, R., Beddington, J.R. and Pitcher, T.J. (2009) 'Estimating the worldwide extent of illegal fishing', PLoS ONE 4(2).

14 Tinch et al. 2008; Zimmerhackel et al. 2018.

15 <https://www.frontiersin.org/articles/10.3389/fmars.2020.00162/full>

16 <https://rusi.org/publication/occasional-papers/below-surface-how-illegal-unreported-and-unregulated-fishing-threaten>

17 Communication from the Commission to the European Parliament and the Council on the State of Play of the Common Fisheries Policy and Consultation on the Fishing Opportunities for 2020, COM(2019) 274 final.

18 [https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-deal/actions-being-taken-eu/eu-biodiversity-strategy-2030\\_en#the-business-case-for-biodiversity](https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-deal/actions-being-taken-eu/eu-biodiversity-strategy-2030_en#the-business-case-for-biodiversity)

## IUU fishing and consumer information

The Farm to Fork Strategy recognises that EU citizens “expect transparency notably about the methods of food production, its origin, nutritional value and the quality of what they have on their plates”.<sup>19</sup> As seafood moves further along the supply chain, it becomes increasingly difficult to trace its origins and traders. The opacity of this process, coupled with enormous profits, have attracted fraudulent operators. However, there are already many measures and systems in place that can be further utilised to assure EU citizens that their seafood is legally and sustainably sourced.

One source of data is the EU Catch Certificate. Introduced under the “EU IUU Regulation” in 2008, this is a central tenet of the EU’s policy to increase traceability and stop IUU fishing. Catch certificates, which provide information on how and where fish is caught, must be provided by everyone that imports fish to the EU, as a means of verifying the legality of their seafood. The EU can further deter IUU fishing by requiring three key pieces of traceability information<sup>20</sup> that are currently missing from catch certificates.<sup>21/22/23</sup>

- **An International Maritime Organisation (IMO) number<sup>24</sup> or another unique vessel identification (if IMO number not applicable).** Ensuring every vessel has a form of identification that stays with it throughout its lifespan means imported seafood can be accurately and efficiently traced back to the vessel it was caught by, even if it changes its name or flag. At present, an IMO number is only required for exports to the EU if it has been mandated by the flag State. It should be required in all cases. It is also issued for free by IHS Markit on behalf of the IMO.
- **The type of fishing gear used by the vessel in its fishing operation.** This will assist competent authorities in determining if the imported seafood has been caught legally, using the permitted gear.
- **A more specific catch area and catch date.** This would enable competent authorities to precisely and efficiently identify where and when the fish was caught.

There is also an opportunity to fight against illegality and fraud by gathering more accurate information about the origin and sustainability of seafood through the EU fisheries control system, which the Commission has proposed to revise.<sup>25</sup> All seafood that is to be placed on the EU market must be put into ‘lots’<sup>26</sup> before entering the EU market in accordance with general food law.<sup>27</sup> Regarding imported fishery products from third countries, if EU Member States were obliged to use CATCH (a digitised data collection and sharing system) as foreseen by the revision process, it would close loopholes in both the EU’s Catch Certification scheme and the traceability of lots. It would also underpin efforts to harmonise enforcement across EU Member States, which is central to ensuring legal and sustainable supply chains because it would prevent IUU fishers from targeting Member States in which enforcement is weak, as a means of channelling IUU catches onto the EU market.<sup>28</sup>

**Ending IUU fishing by closing gaps in information, while harmonising data collection and enforcement across Member States, would improve the sustainability of EU fish and seafood supply chains. It would deter IUU fishing by reducing economic incentives and making it a higher risk activity for lower rewards.**

19 [https://ec.europa.eu/food/sites/food/files/food\\_farm2fork\\_20191212\\_qanda.pdf](https://ec.europa.eu/food/sites/food/files/food_farm2fork_20191212_qanda.pdf)

20 Key data elements identify the who, what, where, when and how of fishing landing.

21 [http://d2ouvy59p0dg6k.cloudfront.net/downloads/iuuwatch\\_kdesforimportcontrolschemes\\_report\\_jan2020.pdf](http://d2ouvy59p0dg6k.cloudfront.net/downloads/iuuwatch_kdesforimportcontrolschemes_report_jan2020.pdf)

22 For more details: <https://www.pewtrusts.org/en/research-and-analysis/fact-sheets/2017/05/the-imo-number-explained>

23 <http://www.iuuwatch.eu/2020/04/increasing-the-traceability-and-legality-of-imported-seafood/>

24 For more details: <https://www.pewtrusts.org/en/research-and-analysis/fact-sheets/2017/05/the-imo-number-explained>

25 Proposal for a Regulation of the European Parliament and of the Council amending Council Regulation (EC) No 1224/2009, and amending Council Regulations (EC) No 768/2005, (EC) No 1967/2006, (EC) No 1005/2008, and Regulation (EU) No 2016/1139 of the European Parliament and of the Council as regards fisheries control, COM/2018/368 final, 2018/0193(COD).

26 [http://www.iuuwatch.eu/wp-content/uploads/2020/04/Traceability-of-lots-study\\_FINAL.pdf](http://www.iuuwatch.eu/wp-content/uploads/2020/04/Traceability-of-lots-study_FINAL.pdf). According to Articles 4 and 20, 2009 Control Regulation (EC 1224/2009), lots are defined as “a quantity of fisheries and aquaculture products of a given species of the same presentation and coming from the same relevant geographical area and the same fishing vessel, or group of fishing vessels, or the same aquaculture production unit”.

27 Control over such seafood falls under the Council Regulation (EC) No 1224/2009 of 20 November 2009 establishing a Community control system for ensuring compliance with the rules of the common fisheries policy (or the EU Control Regulation).

28 [http://www.iuuwatch.eu/wp-content/uploads/2018/02/TDA\\_report\\_IUUwatch\\_HQ.pdf](http://www.iuuwatch.eu/wp-content/uploads/2018/02/TDA_report_IUUwatch_HQ.pdf)



## IUU fishing and EU best practices

On a global level, full traceability in the seafood chain is still hindered by the opacity that pervades much of the fishing industry and allows IUU fishing to thrive. The EU is well positioned to change this. As the largest seafood market, with one of the world's largest distant water fleets, it has considerable leverage in global fisheries management and is an influential member of a number of RFMOs. It could further exert its influence to improve transparency, and thereby ensure food safety, food traceability and food security for the growing global population, as well as a level playing field for its own industry.

A recent report by the EU IUU Coalition<sup>29</sup> highlighted opportunities for the EU to effectively tackle IUU fishing by working with RFMOs to improve transparency across the fisheries supply chain. For example, the EU could encourage third countries to rigorously monitor or ban the movement of catches from one vessel to another at sea (so-called 'transshipments'). This would prevent IUU fishers laundering their catch by mixing it with legitimately caught fish, which makes it almost impossible for consumers and importers to ascertain the conditions in which fish has been harvested.

Furthermore, the EU currently has one of the most comprehensive seafood Catch Documentation Schemes (CDS), devised as part of the EU IUU Regulation to prevent seafood deriving from IUU fishing entering the EU market. As stipulated by the Regulation, any seafood entering the EU originating from a non-EU country must be accompanied by the aforementioned Catch Certificate, which must be verified by a competent authority who can confirm the legality of the catch. The EU should work internationally with both market States and RFMOs to help adopt ambitious and robust CDS that are effective in preventing IUU fishing. As highlighted in a report by the EU IUU Coalition,<sup>30</sup> it is important that CDS are standardised and harmonised globally, and that they collect data digitally. Failure to do so risks different systems being poorly understood by exporters, design flaws passing undetected and potentially adding considerable compliance costs to the industry.

**Ending IUU fishing by improving transparency across the sector would help advance the goals of the Farm to Fork strategy by strengthening the resilience and sustainability of the EU food system, while contributing to food security in the face of climate change and biodiversity loss. It would also help position the EU as a leader in the global transition towards a sustainable, low carbon food system.**



29 Achieving Transparency and Combating IUU Fishing in RFMOs [http://www.iuuwatch.eu/wp-content/uploads/2019/05/RFMO-report\\_EN\\_May-2019\\_FINAL.pdf](http://www.iuuwatch.eu/wp-content/uploads/2019/05/RFMO-report_EN_May-2019_FINAL.pdf)

30 <http://www.iuuwatch.eu/wp-content/uploads/2020/01/CDS-Study-WEB.pdf>

---

## Opportunities for positive action

Ending IUU fishing, both in the EU and internationally, would bring a multitude of social, ecological and economic benefits and advance progress towards European food becoming the global standard for sustainability. The EU IUU Coalition considers that the Commission can capitalise on these benefits and advance the effective execution of the EU Farm to Fork Strategy by further prioritising IUU fishing.

### The EU IUU Coalition recommends that EU decision makers:

- Recognise that ending IUU fishing is a critical component in the shift to sustainable fish and seafood production;
- Build upon the Commission's commitment to take a “zero-tolerance” approach to IUU fishing by taking ambitious, concrete and enforceable measures to tackle the problem. These measures are already available, are cost-effective and most are ready to deploy; many have already been implemented by EU Member States, flag States and RFMOs worldwide but consistency is lacking.

### Within the EU:

- Increase efforts to tackle IUU fishing by acknowledging that it would make a significant contribution to a resilient, healthy and sustainable EU food system and by considering the issue when developing the forthcoming framework for a sustainable food system;
- Harmonise action against IUU fishing across Member States;
- Implement relevant good governance and transparency measures for the European fleet;<sup>31</sup>
- Expand the EU Catch Certification's Key Data Elements to include a more specific catch area linked to catch date, port of landing, fishing gear type or catch methods, and make requirements on IMO numbers mandatory and in line with the latest IMO eligibility requirements; no seafood import should be allowed from a vessel without an IMO number;
- Use the EU Control Regulation as an opportunity to introduce digitised traceability and improve the traceability of lots;
- Make the EU CATCH system mandatory for Member States so that seafood caught in EU and non-EU waters can be electronically traced and promote its use to third countries;
- Improve labelling on the sustainability performance for imported seafood products (including scientific name and country of origin) by strengthening EU marketing standards for fishery and aquaculture in line with calls from the Market Advisory Council.<sup>32</sup> Ensure labels “comply with similar requirements and standards that Union producers have to comply with, in particular Council Directive 2017/159 on the implementation of the social partners' agreement on the ILO Work in Fishing Convention, 2007”.

### Internationally:

- Use their significant influence to incentivise more rigorous international action to deter IUU fishers by improving global fisheries transparency and governance in fisheries management taking into consideration NGO recommendations.<sup>33</sup> These measures are already available, are relatively low-cost and most are ready to deploy; many have already been implemented by flag States and RFMOs worldwide.
- Implement the external aspect of the EU IUU Regulation ambitiously and consistently;
- Raise sustainable food standards globally by using all available tools, including the bilateral dialogues and the EU's considerable presence and influence within RFMOs, to incentivise non-EU States to implement good governance and transparency measures to tackle IUU fishing in their waters.<sup>34</sup>

---

31 [http://www.iuuwatch.eu/wp-content/uploads/2019/10/Transparency-good-governance-criteria\\_EU-IUU-Coalition.pdf](http://www.iuuwatch.eu/wp-content/uploads/2019/10/Transparency-good-governance-criteria_EU-IUU-Coalition.pdf)

32 <https://marketac.eu/wp-content/uploads/2019/07/MAC-Advice-Marketing-Standards-PROCESSED-12.07.2019.pdf>

33 [http://www.iuuwatch.eu/wp-content/uploads/2019/10/Transparency-good-governance-criteria\\_EU-IUU-Coalition.pdf](http://www.iuuwatch.eu/wp-content/uploads/2019/10/Transparency-good-governance-criteria_EU-IUU-Coalition.pdf)

34 [http://www.iuuwatch.eu/wp-content/uploads/2019/05/RFMO-report\\_EN\\_May-2019\\_FINAL.pdf](http://www.iuuwatch.eu/wp-content/uploads/2019/05/RFMO-report_EN_May-2019_FINAL.pdf)



**The Environmental Justice Foundation (EJF), Oceana, The Nature Conservancy, The Pew Charitable Trusts and WWF – the EU IUU Coalition – are working together to promote EU leadership in improving global fisheries transparency and governance to end illegal, unreported and unregulated (IUU) fishing.**

---

**Contact:**

**Sophie Nodzenski** | Environmental Justice Foundation | Tel: +44 (0)207 239 3310 | [sophie.nodzenski@ejfoundation.org](mailto:sophie.nodzenski@ejfoundation.org)

**Vanya Vulperhorst** | Oceana | Tel: +32 (0)2 513 2242 | [vvulperhorst@oceana.org](mailto:vvulperhorst@oceana.org)

**Emily Langley** | The Nature Conservancy | Tel: +44 (0)203 915 5362 | [emily.langley@tnc.org](mailto:emily.langley@tnc.org)

**Nikolas Evangelides** | The Pew Charitable Trusts | Tel: +44 (0)207 535 4232 | [nevangelides@pewtrusts.org](mailto:nevangelides@pewtrusts.org)

**Alexandre Cornet** | WWF | Tel: +32 483 764 422 | [acornet@wwf.eu](mailto:acornet@wwf.eu)

---



© WWF | Chris Gomersall