

HOW TO COMMIT CRIMES AT SEA WITHOUT GETTING CAUGHT.

*An idiot's guide to
hidden ownership of
your fishing fleet*



**SO YOU WANT
TO PLUNDER THE
OCEAN, PROFIT FROM
TRANSNATIONAL
CRIME AND DODGE THE
BLAME? HERE'S HOW!**

Step 1: Pick a friendly flag

Why register your vessel under your own country's flag (where people might check who you are) when you can shop around for a "flag of convenience"? Think of a country that asks few questions, does no checks, and has weak or no law enforcement.

If your ships do get caught breaking the law, just buy your way out with a small fine or a bribe. If that becomes too expensive, you can still paint over the name, switch to a new flag state, move to another State's territory, and you should be fine to carry on as before.

Staying two steps ahead of law enforcement is a key part of the toolkit to get away with shark finning, dolphin hunting and illegal fishing.

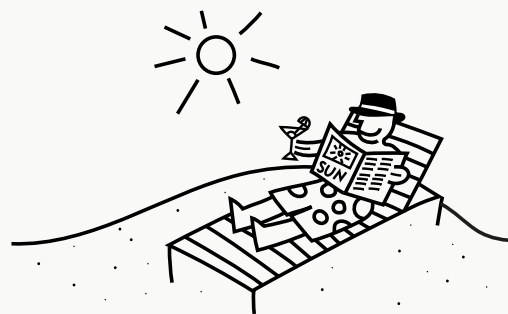
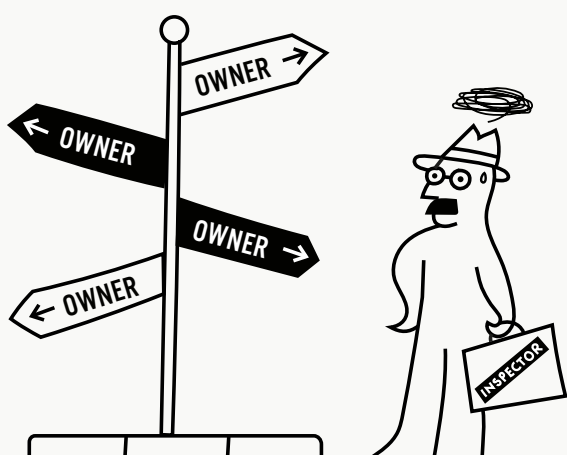


Step 2: Build a corporate maze

Set up a shell company somewhere where corporate secrecy is a selling point. Make that company own another company in another country and register that one as the owner of your ships. The good news: you have plenty of options, in every region of the world!

Almost no country requires you to be registered as the person ultimately profiting from the fleet, so it's even more relaxed than other financial secrecy issues. If your vessels are caught trafficking drugs or using banned fishing gear, that's between the authorities and the captain, and not your problem.

This kind of corporate nesting doll lets you profit from vessels that abuse crew, destroy marine ecosystems, or traffic wildlife — all without your name ever appearing on a public register.



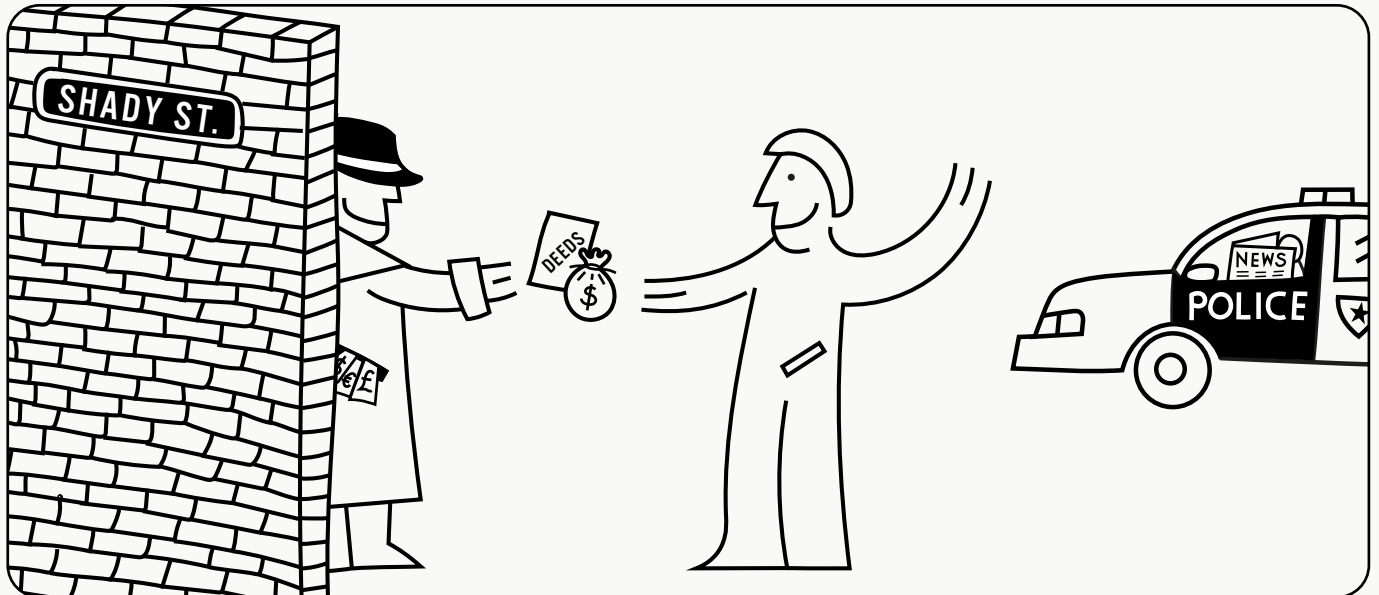
Step 3: Hire a local frontman

National laws stopping foreign ownership? No problem! Just find a friendly local “business partner” who’ll register the company or the vessel in their name, or as a joint venture. They look legit on paper, but you’re still the one raking in the cash behind the scenes.

When your vessel gets caught using illegal gear or trashing artisanal nets, your front takes the fine.

You take the profits.

Historically, in Ghana, up to 90% of supposedly local vessels are actually controlled by Chinese interests using this exact trick.

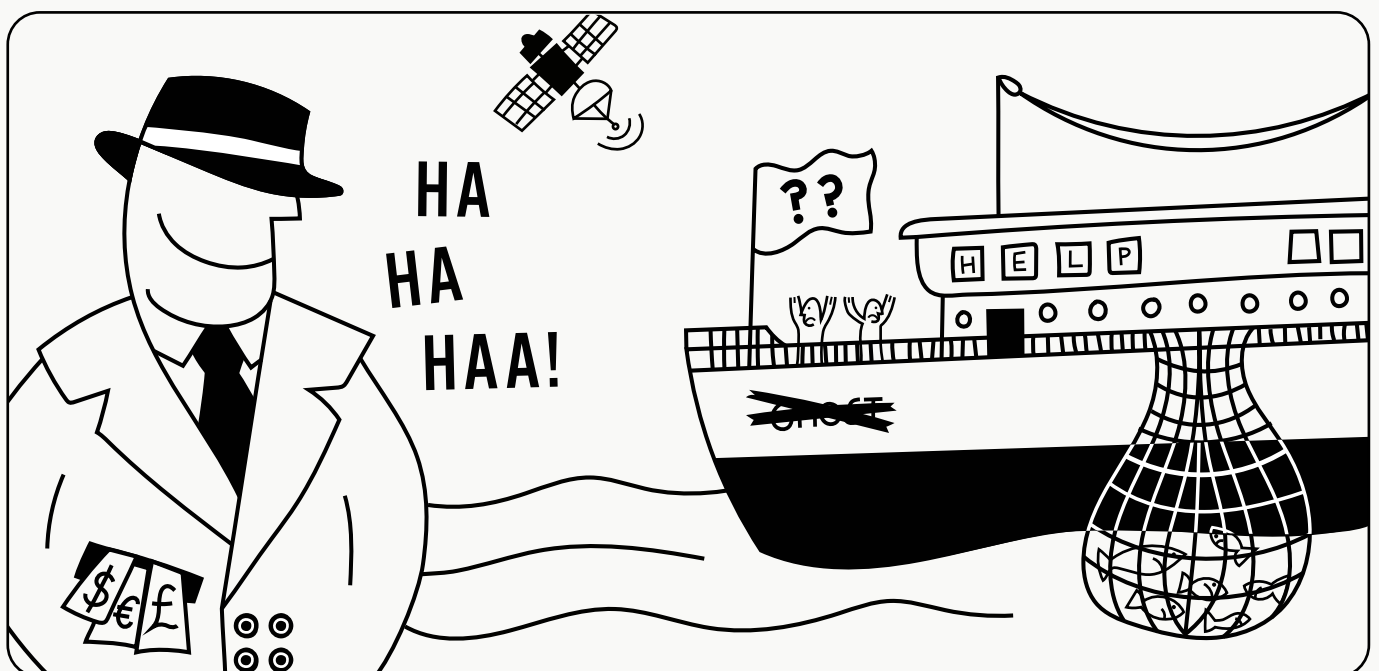


Step 4: Outsmart the satellites

Sure, technology can spot your vessel fishing in a marine protected area (MPA). But it can't yet say who owns the vessel, who sent it there, or that you're the one making money from it. The paper trail ends at a dead-end shell company.

The satellites also won't be able to tell if your crew are not getting paid, if they've been trapped on board for years on end, or if they are living in squalid conditions, so feel free to go ahead with these to bring costs down

- you're here to make money, not friends!



THE BOTTOM LINE:

It should *not* be like this,
and there is a simple solution.

For every \$1
invested in ownership
transparency,
governments can
save or recover
up to \$20.

Hiding the true ownership of fishing vessels enables illegal, unreported and unregulated (IUU) fishing, severe labour abuses, and the industrial-scale destruction of ocean ecosystems.

But this is not inevitable.

Identifying and publicly disclosing the **beneficial owners of vessels** can disrupt the chains of secrecy, enable the sanctioning of the real individuals who profit from crimes, and act as an effective deterrent in changing behaviours and in forcing criminal actors to seek new avenues for concealing illicit activities and proceeds.

MAKING IT A REALITY

EJF recommends that national governments:

1. Require disclosure of beneficial ownership for all fishing vessels flying their flag, as a condition of registration and licensing, before granting access to fish in national waters.
2. Register beneficial ownership and interests held by their nationals in foreign-flagged vessels — to ensure that accountability extends beyond the flag state.
3. Hold information on beneficial owners in centralised registers to support law enforcement, tax agencies, and other stakeholders in their efforts to investigate, prevent and sanction any wrongdoing.
4. Support international cooperation and data sharing, including by leveraging existing international tools and agreements, such as the FAO Global Record of Fishing Vessels, the Port State Measures Agreement, and RFMO transparency provisions.
5. Make it a mandatory requirement for all fishing vessels to have vessel tracking technology turned on – *at all times!* – and share VMS data with Global Fishing Watch, making this data available to everyone, all the time, for free.

Where possible, make them public, searchable, and interoperable across agencies and jurisdictions.