



INSIDE CAMEROON'S WATERS

**IUU fishing and labour rights abuses
in Cameroon's industrial fishing sector**



Protecting People and Planet



Cameroon's coastline stretches approximately 400 km from the Nigerian border in the west to the Equatorial Guinea border in the south, and its exclusive economic zone (EEZ) covers nearly 15,000 km². This geographic spread provides the country with rich and diverse coastal ecosystems, including one of the world's 321 marine regions listed as an Ecologically or Biologically Significant Marine Area under the Convention on Biological Diversity, the Kribi-Campo region.¹ This region alone exemplifies the richness of Cameroon's marine biome, a conservation hotspot providing feeding, breeding, and living grounds for numerous species.

According to the latest data published by the Food and Agriculture Organization of the United Nations (FAO), in 2022, the country's total capture production was estimated at 299,000 tonnes.² Small pelagics make up about 45% of the marine catch,³ but other commercially valuable species, such as shrimp and demersal (bottom-dwelling) fish, make Cameroon's EEZ even more attractive for fishing activities. Over 212,000 fishers are estimated to rely directly on fisheries for their livelihoods,⁴ underscoring the sector's role in the socio-economic fabric of the country. Additionally, fish is a favoured source of protein for many Cameroonians, with an average consumption of 19.3 kg per person in 2021,⁵ highlighting its importance in the nation's diet.

Yet Cameroonian fisheries face multiple threats, including illegal, unreported, and unregulated (IUU) fishing, which remains a tragic reality and negatively impacts marine and coastal ecosystems and the people who depend on them, as this briefing describes.

Since 2022, EJF has supported the Government of Cameroon in its efforts to curb IUU fishing, strengthen its monitoring, control, and surveillance (MCS) systems, and improve transparency in the fisheries sector. This support is part of a project in partnership with the Ministry of Livestock, Fisheries and Animal Industries (MINEPIA) and the African Marine Mammal Conservation Organization (AMMCO), a Cameroon-based NGO. EJF is also working in partnership with the Ministry of Forestry and Wildlife and the Cameroon Wildlife Conservation Society (CWCS) to strengthen community management and participatory surveillance in the Douala-Edéa National Park and conserve its biodiversity.

As Cameroon is in the process of adopting a new legal framework for fisheries management and of revising its national plan of action against IUU fishing (NPOA-IUU), it is presented with a unique opportunity to become a regional champion in ocean governance and the fight against IUU fishing. This briefing summarises the main challenges faced by Cameroon in the fight against IUU fishing within its waters. It includes recommendations for the Government of Cameroon to address these challenges, intending to improve the country's performance as a flag, coastal, and port state. These steps aim to ensure the sustainable management of its marine resources and the well-being of the people who depend on them.

The information presented in this briefing is derived from public sources, discussions with stakeholders, and observations made by EJF in the context of its work in Cameroon.

1. IUU fishing in Cameroonian waters

IUU fishing has been described as ‘commonplace’ in Cameroonian waters.⁶ Industrial vessels are reportedly routinely involved in a range of IUU fishing offences, including fishing without a licence, the use of unauthorised gear, and fishing in prohibited areas such as the three-nautical-mile zone reserved for artisanal fishers.⁷ This is confirmed by information obtained and observations made by EJF, which give reason to believe that IUU fishing is a serious and persistent challenge in the country’s waters.

1.1 Fishing without a licence

A number of trawlers appeared to be actively fishing in Cameroonian waters in late 2023, despite not being included in the list of vessels licensed to fish in 2023. According to official licence lists these vessels were not licensed to fish until the year 2024.⁸ It would appear that they were renamed and changed operators at some point over the course of 2023. However, EJF was unable to ascertain whether a licence transfer was approved by the Cameroonian authorities, as required by law.⁹

1.2 Use of unselective nets, bycatch, and discards

The minimum mesh size for industrial vessels is specified by law for both fish and shrimp trawl nets.¹⁰ Modifying a net so as to reduce its selectivity, and keeping a net on board with an illegal mesh size, are prohibited.¹¹ Moreover, catching undersized and juvenile fish,¹² discarding commercially viable fish,¹³ and catching sea turtles¹⁴ are prohibited under Cameroonian law.

However, industrial trawlers reportedly use modified nets with a smaller, illegal mesh size to maximise their catch. This results in the widespread bycatch of undersized and juvenile fish, which are either sold illegally or discarded dead. Vulnerable marine megafauna, such as sharks and rays, turtles, and cetaceans, are also frequently caught as bycatch.

1.3 Incursions into the zone reserved for artisanal fishing and marine protected areas

Trawling is prohibited within three nautical miles of the baseline established by decree.¹⁵ As all industrial fishing vessels licensed to fish in Cameroonian waters are trawlers, this creates a de facto inshore exclusion zone (IEZ) reserved for artisanal fishers. The obligation not to enter this prohibited zone is noted on the fishing licence document issued to operators.

Yet trawlers routinely and openly fish within this area. This is confirmed by testimony from both artisanal fishers and crew working on board trawlers. EJF also directly observed a number of trawlers fishing illegally within less than three nautical miles of the shore. Satellite data confirms that trawling within the IEZ occurs almost everywhere along the coastline and within marine protected areas (MPAs). AIS data analysis suggests that since 2020, industrial vessels have fished for over 78,400 hours within Cameroon’s IEZ,¹⁶ mostly in the waters of the Littoral and Southwest regions (**Figure 1**).

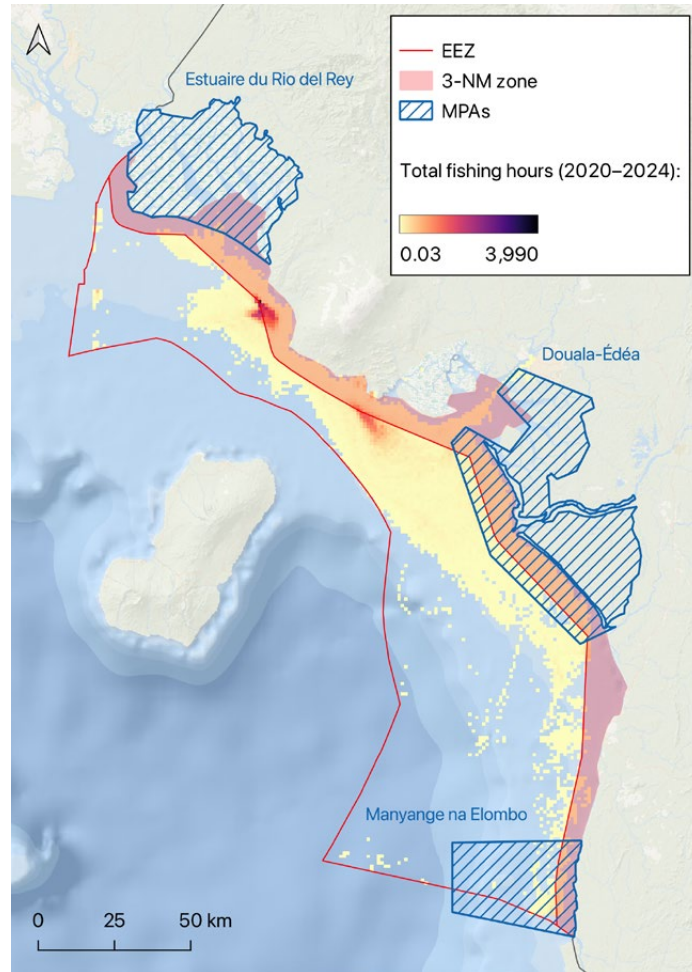


Figure 1: Distribution of fishing pressure in Cameroon's EEZ since 2020, including in the 3-NM zone reserved for artisanal fishing and in MPAs (sources: GFW, WDPA). 2024 data covers the January–August period.

Moreover, there is reason to believe that trawlers also enter river estuaries to fish, including the Wouri and Sanaga estuaries, despite a ban on fishing inside estuaries.¹⁷



An industrial trawler is fishing illegally inside the zone reserved for artisanal fishers in the Douala-Édéa National Park, dangerously close to artisanal canoes.

2. Impacts on fish populations and marine ecosystems

Artisanal fishers have seen their catches decline over the years, and attribute declines in fish populations directly to overfishing and the use of unselective nets by trawlers. While the exploitation status of key fish populations in Cameroonian waters remains uncertain due to a lack of data,¹⁸ researchers from the Agricultural Research Institute for the Development of Cameroon (IRAD) have reported a rapid decline in fish populations.¹⁹

There is reason to believe that trawlers actively target fish breeding and nursery grounds to fill up their holds with small fish. Most of the undersized fish captured by trawlers appear to be caught while fishing illegally inside the three-nautical-mile zone.

Catching juveniles before they reach reproductive age poses a serious threat to fish populations and risks undermining the future of Cameroon's fisheries, raising concerns for the population's food security in a country that remains heavily reliant on imports to satisfy domestic demand for fish.²⁰



The Youpwé fish market in the suburbs of Douala. Fish is an important component of the diet of many Cameroonians, but fish populations are under threat from IUU fishing.

Industrial fishing vessels, particularly trawlers, also have a detrimental impact on marine species such as sharks and rays, cetaceans, and sirenians, which are frequently caught as bycatch, as highlighted in Section 1.2.



The landing site in Yoyo II, an artisanal fishing village in the Douala-Edéa National Park. The community is heavily impacted by IUU fishing by industrial trawlers.

3. Impacts of IUU fishing on artisanal fishing communities

The continuous presence of industrial trawlers in the IEZ reserved for artisanal fishing represents a severe threat to coastal communities, whose livelihoods are impacted by the general decline in fish populations attributable to trawlers and the frequent destruction of fishing gear.

Artisanal fisheries generate 84% of Cameroon's fish production.²¹ Yet, despite their critical role in supplying fish products to Cameroon's population, artisanal fishing communities are not always involved in decision-making concerning the management of coastal fisheries resources. Moreover, many artisanal fishers have minimal access to government services as they are not Cameroonian nationals and do not hold a residency permit. Coastal communities have been reporting the impacts of illegal incursions by the industrial fishing fleet for decades,²² yet little progress has been achieved to remedy this situation.

Nets used by artisanal fishers are routinely damaged by trawlers fishing illegally within the IEZ. Testimonies given by artisanal fishers and crew indicate that incidents involving the destruction of fishing gear by trawlers are pervasive, denoting a pattern of utter disregard for artisanal fishers on the part of industrial vessels. There is even reason to suspect that some captains may intentionally drive their vessel over artisanal fishers' nets in an effort to target areas of high fish density.

Depending on the extent of the damage, the cost of repairs can be substantial for fishers who have to invest time and resources instead of going fishing. The cost of replacing a net altogether can be prohibitive, typically ranging from 500,000 to 800,000 FCFA. When factoring in the frequency at which these incidents occur, the damage is often insurmountable for fishers. One fisher told EJJ that he had his nets damaged by trawlers on multiple occasions within a single year, causing him to give up fishing entirely.

The harm caused to artisanal fishers is often permanent, as fishers rarely receive adequate compensation for damaged or lost gear. This is due to a combination of factors. First, in order to file an official complaint, fishers must be able to provide the identifiers of the vessel, which often poses an insurmountable obstacle as fishers are afraid of approaching vessels because of the presence on board of armed military personnel. In the vast majority of cases, fishers are unable to record the name of the vessel and to file a complaint.

Secondly, when sufficient evidence could be gathered for a complaint to be filed and operators are summoned by the MINEPIA for mediation, the amount offered by the operator to the fisher is generally much lower than the costs incurred by the fisher to buy or assemble the damaged net. Fishers have no remedy to challenge the amount offered and have no choice but to accept unfavourable settlement terms.

When artisanal fishers try to report damaged nets to the police, they are often told that there is nothing to be done. The destruction of an artisanal fisher's property does not appear to constitute an offence under Cameroonian law.



Artisanal fishers hauling their catch of bonga shad on an awasha boat. Artisanal fishers play an essential role in supplying fish to the Cameroonian market.

4. Abuses of labour rights in the coastal trawling fleet

The Merchant Shipping Community Code of the Central African Economic and Monetary Community (CEMAC), which was adopted by regulation²³ and as such is binding and directly applicable in CEMAC member states,²⁴ requires Cameroon to ensure safe and decent working and living conditions for seafarers employed on board commercial vessels.²⁵ Yet working conditions for crew employed by Cameroonian operators on board industrial fishing vessels in Cameroonian waters fall short of international standards. Seamen working onboard trawlers recently went on strike to denounce poor working conditions and low wages.²⁶

Crew have virtually no job security. They are hired without a contract, and remain dependent on brokers to find employment. Despite recent improvements, wages remain low by industry standards. As a result, crew struggle to make ends meet and provide for their household — one seaman told EJF that he felt that he had no choice but to keep working ‘until his death’.

Crew find little time to rest as they are required to work around the clock, both during the day and at night, and describe feeling constantly exhausted. Yet the facilities on board vessels are wholly inadequate to allow for quality rest. According to crew members, sleeping quarters are in a ‘deplorable’ state, dirty and mouldy, and infested with rodents and cockroaches. The heat is unbearable due to the lack of ventilation, and rain water leaks into the room and soaks mattresses. This often forces the crew to sleep under makeshift shelters built on the foredeck. Crew can spend many days working at sea, and only have less than 24 hours of resting time in between trips.



An industrial trawler employing Cameroonian crew. Makeshift shelters built by crew to escape dilapidated and insalubrious quarters are visible on the foredeck.

Until recently, crew were not provided with bottled drinking water. Drinking water was instead reportedly sourced from wells dug in insalubrious areas. Crew were routinely suffering from diarrhoea and stomach aches, and cases of typhoid and cholera were recorded. Two seamen reportedly died of cholera in 2022, presumably as a result of drinking contaminated water provided by the fishing companies.

Crew are also exposed to unsafe working conditions with a risk of injury or even death. Several seamen were lost at sea in recent years due to accidents. Despite repeated demands, fishing companies have yet to join Cameroon's social security system, leaving crew without any safety net in case of illness or injury.

Verbal and physical abuse by Chinese crew are reportedly frequent. In one exceptionally serious incident dated February 8th, 2024, a seaman was severely injured by the Chinese first mate who lashed out at him with a knife. Smartphone videos of the incident obtained by EJF show that the victim suffered serious injuries on the shoulder, hand and arm, causing significant blood loss. It is unclear what action, if any, was taken against the perpetrator.

Migrant workers, mainly of Ghanaian origin, are also employed on some industrial fishing vessels. They are reportedly offered less favourable terms than their Cameroonian coworkers, with wages said to be withheld for prolonged periods of time.

5. The need to strengthen monitoring, control and surveillance capacity

The MINEPIA's Fishing Activities Control and Surveillance Brigade (BCSAP), in charge of MCS in Cameroonian waters, is facing significant challenges. With limited resources and capacity, it is ill-equipped to fulfil its mandate.

The MINEPIA in general and fisheries management authorities in particular suffer from a critical lack of financial and material resources. Between 2015 and 2020, funding for the MINEPIA as a whole represented on average 0.83% of Cameroon's national budget.²⁷ For the financial year 2024, funding specifically dedicated to fisheries development and management within the MINEPIA amounts to 14,7 billion FCFA, which represents just above 0.2% of Cameroon's total budget for the year.²⁸

The BCSAP's operational capacity is limited, with no centralised surveillance centre, no speedboats for rapid intervention, and insufficient technological capacity. Cameroon used to have a functioning VMS-based MCS system, but that system was apparently dismantled. The BCSAP has to rely on AIS monitoring, which does not allow for real-time intervention because of AIS signal latency, and offers very limited coverage as legal requirements to operate AIS are unclear²⁹ and many vessels switch off their AIS transponder, especially when engaging in illegal activity.

Likewise, local MINEPIA officials in charge of MCS in coastal communities do not have the means to carry out their duties. A MINEPIA representative told EJF that he was given a boat with an engine, but had no funding for fuel and no skipper, so he had to buy fuel out of his own pocket and to request assistance from community members to conduct patrols or intervene at sea. Moreover, due to precarious maritime security, he has to be accompanied by a military escort to approach the vessels.

Despite limited resources, the Cameroonian authorities have succeeded in identifying and taking action against vessels involved in IUU fishing. Last year, 29 vessels active in the country's waters were reportedly inspected, resulting in 15 vessels being fined and 85 tonnes of immature fish being seized.³⁰

However, the sanctions imposed on operators do not appear sufficient to deprive perpetrators of the benefits of illegal activities and to deter future wrongdoing, and sanctioned vessels and companies are left free to continue their operations without their fishing licences being suspended or withdrawn.³¹

The need to improve MCS capacity is all the more pronounced given that operators appear capable of deploying a range of fraudulent strategies to avoid detection, inspections and sanctions. These include switching off AIS transponders, undeclared landings of juveniles and undersized fish at unauthorised landing sites, dissimulation of illegal nets, and receiving tip-offs.

6. The need to improve transparency in the fisheries sector

Achieving greater transparency in fisheries management is essential for curbing IUU fishing.³² Opaque regulatory and policy frameworks facilitate illicit activities by operators, enable misconduct by other interested parties, and undermine law enforcement efforts, public scrutiny and institutional trust, and accountability.

Cameroon recently took important steps to improve fisheries transparency, notably by publishing the list of vessels licensed to fish in the country's waters for the year 2023.³³ The list of vessels authorised to fish outside Cameroon's waters was also published for the first time in July 2024, along with the updated list of coastal fishing licences.³⁴

Yet despite ongoing efforts, Cameroon's fisheries sector still suffers from a lack of transparency in five key aspects. All of which could be improved by enshrining the principles of the Global Charter for Fisheries Transparency into law.

First, Cameroon does not maintain a publicly accessible register of fishing vessels. Cameroon is listed as a data provider on the website of the FAO's Global Record of Fishing Vessel,³⁵ but there does not appear to be any Cameroonian-flagged vessel registered in the database. Only 6% of the vessels currently licensed to fish in Cameroonian waters could be matched with an IMO number, a unique identification number permanently associated with a vessel to facilitate identification throughout its life history.

Secondly, while Cameroonian-flagged trawlers are operated by Cameroonian fishing companies, it appears that the vast majority of the vessels licensed to fish in Cameroonian waters in 2024 are owned or ultimately controlled by foreign interests, mainly based in the People's Republic of China. The identity of the registered owners and of the beneficial owners, as well as the modalities of profit sharing between Cameroonian operators and foreign entities, remain cloaked in secrecy. The manager of Société DL-Camerounaise de pêche industrielle SARL, a now inactive fishing company, was quoted saying: 'the terms of my agreement with my foreign Chinese expert is private and even the Prime Minister or Minister who issued my fishing permits have no information'.³⁶

Thirdly, the conditions under which fishing licences are issued and renewed remain opaque. Although under Cameroonian law fishing licences are automatically renewed after their expiry if the authorities fail to respond to an application for renewal,³⁷ the licence list for the year 2024 was not made public until the month of July, seven months after the renewal deadline.

Fourthly, it is unclear whether vessels are legally required to transmit VMS or AIS signals while fishing. While decisions granting individual fishing licences include a requirement for the vessel to comply with 'applicable regulations', including the obligation 'not to switch off satellite monitoring systems (VMS, AIS)', the source of that obligation in applicable regulations could not be identified.³⁸

Finally, there is a dearth of fisheries data, including detailed landings statistics disaggregated by species, and scientifically robust stock assessments, which are essential to the sustainable management of Cameroon's fisheries.

Beyond these considerations, Cameroon has not completed the process of becoming a party to several key international legal instruments related to fisheries governance. This includes, notably, the UN Fish Stocks Agreement (UNFSA),³⁹ the FAO Compliance Agreement,⁴⁰ and the FAO Port State Measures Agreement (PSMA).⁴¹ The UNFSA aims to ensure the sustainable management of fish stocks, the Compliance Agreement promotes compliance with international conservation and management measures, and the PSMA seeks to prevent, deter, and eliminate IUU fishing with robust port controls. Cameroon is also not a party to the Cape Town Agreement for the Safety of Fishing Vessels (Cape Town Agreement)⁴² and to the ILO Work in Fishing Convention (ILO C188),⁴³ which aim to improve the safety and working conditions of fishers and ensure that fishing vessels adhere to rigorous safety standards.

7. Conclusions and recommendations

Despite actions taken by Cameroon to tackle IUU fishing, it remains a serious challenge in Cameroonian waters. Trawlers use illegally modified nets to catch undersized and juvenile fish, including in marine protected areas, resulting in presumably severe but poorly studied impacts on fish populations, and in the frequent bycatch of vulnerable marine megafauna. Illegal incursions of trawlers into the zone reserved for artisanal fishing are causing serious harm to artisanal fishing communities, whose nets are routinely damaged by trawlers without adequate compensation. Working conditions for crew on board industrial vessels fall short of international standards: seamen are hired without a contract, work for low wages in dangerous and insalubrious conditions, and are subject to serious physical and verbal abuses. MCS capacity and law enforcement efforts remain insufficient to deter those responsible from engaging in IUU fishing.

To align with its ambition of becoming a regional champion in the fight against IUU fishing and address the issues described in this briefing, Cameroon should ramp up its ongoing efforts to increase its capacity to tackle the problem and prioritise building transparency in fisheries governance. To achieve this, EJF recommends that the Government of Cameroon take the following measures:

Improve legal and regulatory standards against IUU fishing and labour rights abuses:

- Accede to and implement international instruments relevant to the fight against IUU fishing, including the UNFSA,⁴⁴ the FAO Compliance Agreement,⁴⁵ and the PSMA.⁴⁶
- Sign, ratify and implement the Cape Town Agreement⁴⁷ to ensure industrial fishing vessels are built, maintained, and equipped to ensure safe working conditions for crew. Accede to and implement the ILO C188,⁴⁸ and take measures to protect crew working on board industrial fishing vessels against abusive working conditions, notably:
 - Require operators to provide seamen with a contract written in terms that they can understand;
 - Require operators to ensure that crew are given regular periods of rest of sufficient length to ensure their safety and health;
 - Require operators to ensure that crew accommodation on board fishing vessels is of sufficient size and quality;
 - Require operators to ensure that crew are provided at no cost with food of sufficient nutritional value, quality and quantity, as well as with potable water in sufficient quality and quantity;
 - Require operators to ensure that vessels carry appropriate medical equipment and supplies, and that crew are entitled to medical treatment ashore;
 - Establish a system for ensuring compliance, including inspections, reporting, monitoring, complaint procedures, and appropriate penalties and corrective measures.
- As a matter of priority, adopt a revised fisheries law and its implementing regulations aligning with regional and international standards and effectively addressing the issues identified in this briefing.
- Ensure the meaningful participation and engagement of all interested stakeholders, including artisanal fishing communities, non-governmental organisations, and industry in the revision process of the country's NPOA-IUU.

Improve transparency in the fisheries sector:

- Implement the principles of the Global Charter for Fisheries Transparency,⁴⁹ focusing as a matter of priority on the following measures:
 - Refuse to register a vessel in the absence of a genuine link between the vessel and Cameroon (Principle 4);
 - Require operators to provide information on the vessel's ultimate beneficial owners when applying for registration, licencing, or authorisation (Principle 3);
 - Ensure public access to a register of fishing vessels with information on vessel operators, owners, and beneficial owners, and provide relevant information to the FAO Global Record of Fishing Vessels (Principles 2 and 3);
 - Require fishing vessels to transmit AIS at all times (Principle 5);
 - Collect and publish accurate and up-to-date fisheries data (Principle 9).

Close loopholes in the vessels register.⁵⁰

- Before registering a vessel, verify the vessel's history of compliance with fisheries laws and regulations as well as with conservation and management measures of regional fisheries management organisations, and deny registration for vessels with an established history of IUU fishing unless appropriate assurances have been obtained.

Limit the number of fishing licences and authorisations:

- Ensure that the number of fishing licences and authorisations granted to fishing vessels is compatible with the sustainable management of fish populations and the regeneration of marine ecosystems, and commensurate with available MCS capacity.

Improve MCS capacity:

- Enhance the BCSAP's capacity to carry out MCS in Cameroonian waters, notably by requiring fishing vessels to be equipped with VMS and setting up adequately equipped facilities allowing for effective remote vessel monitoring at all times, and by providing local fisheries centres with adequate human and material resources (boat, engine, fuel, skipper, binoculars, safety equipment, etc.).
- Set up and implement an observer programme for the coastal fishing fleet, ensuring comprehensive coverage of the fleet as well as the independence and safety of observers. The observer programme may be progressively supplemented by on-board CCTV and other remote electronic monitoring techniques.

Improve law enforcement:

- Investigate all reports of IUU fishing in Cameroonian waters, including reports submitted in the framework of participatory surveillance schemes, concerning notably the alleged use of illegally modified nets, catch of undersized fish and vulnerable megafauna, and fishing in prohibited areas such as the three-nautical-mile no-trawl zone and estuaries. In case of established infringements of applicable laws and regulations, refer the cases to the competent authorities so that sanctions adequate in severity are taken against those responsible.
- Investigate attempts by operators to avoid inspections, including the alleged dissimulation of illegally modified nets and undeclared landing of undersized fish, and refer the cases to the competent authorities so that appropriate sanctions are taken against those responsible.
- Ensure that sanctions taken against individuals and companies involved in IUU fishing, abuses of workers' rights, and related offences are adequate to deter future wrongdoing and deprive those responsible of the benefits of engaging in illegal activity. Sanctions could include fines, seizure of catch and gear, as well as the suspension or withdrawal of fishing licences.
- Deny to renew a fishing licence for operators found to have committed repeated or serious breaches of applicable fisheries laws and regulations, pursuant to Article 7 of Decree no. 95/413.



An industrial trawler fishing illegally close to shore. Under-resourced MCS authorities are struggling to enforce the law and offenders often remain unpunished.

Prevent and mitigate harmful impacts on artisanal fishers:

- Establish as an offence, in accordance with its domestic legal system, the intentional or negligent damaging of artisanal fishing gear, and provide for appropriate sanctions against those responsible.
- Ensure that artisanal fishers whose property has been damaged by industrial fishing vessels receive adequate compensation from the operators.
- Ensure that if/when military personnel are posted on board industrial fishing vessels, they are appropriately trained to avoid the unnecessary or disproportionate use of armed force against artisanal fishers.

Tackle the enabling factors of IUU fishing and associated abuses:

- Adopt measures to tackle the enabling factors of IUU fishing and associated abuses, such as corruption in the fisheries sector.



Swamp forest in the Douala-Edéa National Park. The park's marine and terrestrial ecosystems are closely interconnected.

- 1 Secretariat of the Convention on Biological Diversity (2015) 'Ecologically or Biologically Significant Areas (EBSAs): Kribi-Campo', <https://chm.cbd.int/database/record?documentID=204061> (accessed 10 October 2024).
- 2 FAO FishStat, 'Global capture production Quantity (1950–2022)', https://www.fao.org/fishery/statistics-query/en/capture/capture_quantity (accessed 10 October 2024).
- 3 FAO (2022) 'Fishery and Aquaculture Country Profiles: Cameroon', <https://www.fao.org/fishery/en/facp/cmr?lang=fr> (accessed 10 October 2024).
- 4 FAO (2024) *Fishery and Aquaculture Statistics — Yearbook 2021*, <https://openknowledge.fao.org/items/707ea9ae-ed5a-4ad9-a551-ae4e78b959d>.
- 5 *Ibid.*
- 6 Tikélé, A. (2023) 'Lutte contre la pêche illicite : le Cameroun tend ses filets', *Cameroon Tribune*, 22 June 2023.
- 7 Nkemngu, A. (2023), 'Cameroon: Two Fishes! One Fish! No Fish: Tale of a Depleting Ocean', *Voice of Nature News*, 1 July 2023, <https://voiceofnaturenews.info/cameroon-two-fishes-one-fish-no-fish-tale-of-a-depleting-ocean/>.
- 8 See and compare MINEPIA (2024), État des lieux des licences de pêche octroyées en 2024, <https://www.minepia.cm/download/liste-des-navires-de-peche-2024/>, and MINEPIA (2023), Liste des navires de pêche ayant reçu la licence de pêche côtière en 2023, <https://www.minepia.cm/download/liste-des-navires-ayant-recus-la-licence-de-peche-cotiere/>.
- 9 Law no. 94/01 establishing Forestry, Wildlife and Fisheries Regulations, Art. 123(2).
- 10 Arrêté n° 002/MINEPIA portant modalités de protection des ressources halieutiques, Art. 9.
- 11 Law no. 94/01 establishing Forestry, Wildlife and Fisheries Regulations, Art. 127(b) and (i); Arrêté n° 002/MINEPIA portant modalités de protection des ressources halieutiques, Art. 11(1).
- 12 Décret n° 95/413/PM fixant certaines modalités d'application du régime de la pêche, Art. 37; Arrêté n° 002/MINEPIA portant modalités de protection des ressources halieutiques, Art. 12.
- 13 Décret n° 75-528 déterminant les modalités d'exploitation de bateaux de pêche à moteur au Cameroun, Art. 24.
- 14 Law no. 2024/008 to lay down forestry and wildlife regulations, Art. 110(2) and 173(a) (entered into force in July 2024); Law no. 94/01 establishing Forestry, Wildlife and Fisheries Regulations, Art. 78, 80, and 158 (applicable before the entry into force of law no. 2024/008); Arrêté n° 0648/MINFOR fixant la liste des animaux des classes de protection A, B, C.
- 15 Law no. 94/01 establishing Forestry, Wildlife and Fisheries Regulations, Art. 127(a); Décret n° 95/413/PM fixant certaines modalités d'application du régime de la pêche, Art. 23.
- 16 Calculated with data extracted from GFW (<https://globalfishingwatch.org/map/>), excluding vessels with less than 5 hours of apparent fishing to account for potential false positives. The total number of fishing hours is likely to be an underestimate, as it does not account for the activity of vessels switching off their AIS transponder.
- 17 Décret n° 95/413/PM fixant certaines modalités d'application du régime de la pêche, Art. 9.
- 18 See e.g., for bonga shad: FAO (2019) *Report of the FAO/CECAF Working Group on the Assessment of Small Pelagic Fish – Subgroup South, Elmina, Ghana, 12–20 September 2018*, CECAF/ECAF Series no. 19/81, <https://www.fao.org/fishery/en/publication/257167>; for demersal species: FAO (2022) *Demersal Resources Working Group South 2022 – Meeting Summary*, Doc. no. CECAF/SSCIX/2022/Ad, <https://openknowledge.fao.org/server/api/core/bitstreams/651c8e48-06a8-4c2c-8fbo-cea05a76a161/content> (only one stock had sufficient data for a conclusive assessment: coastal shrimps, assessed as overexploited).
- 19 Cited in Beseng, M. & Malcolm, J. A. (2021) 'Maritime security and the securitisation of fisheries in the Gulf of Guinea: experiences from Cameroon', *Conflict, Security & Development*, 21, pp. 517–539, <https://doi.org/10.1080/14678802.2021.1985848>.
- 20 As of 2023, 49% of Cameroon's fish consumption was dependent on imports: see MINEPIA (2024) *Production and Imports in the Livestock, Fishery and Animal Industry Sub-sector – Year 2023*, <https://www.minepia.cm/download/production-and-imports-in-the-livestock-fishery-and-animal-industry-sub-sector-2023/>.
- 21 Calculated from statistics published in MINEPIA (n. d.) *Annuaire statistique du sous-secteur de l'élevage, des pêches et des industries animales, édition 2021*, https://ins-cameroun.cm/wp-content/uploads/2023/06/ANNUAIRE-STATISTIQUE-MINEPIA_07-06-22.pdf, for the years 2015–2021; and MINEPIA (2024) *Production and Imports in the Livestock, Fishery and Animal Industry Sub-sector – Year 2023*, <https://www.minepia.cm/download/production-and-imports-in-the-livestock-fishery-and-animal-industry-sub-sector-2023/>, for the years 2022–2023 (including production from inland fisheries).
- 22 See Njifonjou, O., Folack, J., Bondja, M., Njock, J.-C. et al. (1995) *Enquête-cadre et étude socio-économique de la pêche artisanale maritime au Cameroun*, Rapport technique n° 75, Rome: FAO, <https://www.fao.org/4/an192f/an192f.pdf>; and the update study conducted by the MINEPIA in 2009: MINEPIA (2009) *Enquête-cadre et étude socio-économique auprès des communautés de pêche de la façade maritime du Cameroun* [on file with EJF].
- 23 Règlement n° 08/12-UEAC-088-CM-23 portant adoption du Code communautaire de la marine marchande.
- 24 Traité révisé de la Communauté économique et monétaire de l'Afrique centrale, 30 January 2009, Art. 41.
- 25 Code communautaire de la marine marchande, Book V, in particular Titles IV and V.
- 26 Équinoxe TV (2024) 'Manifestation des marins du port de pêche de Youpwé', YouTube, 2 May 2024, <https://www.youtube.com/watch?v=kYWAfPnGN4c> (accessed 10 October 2024).
- 27 MINEPIA (n. d.) *Annuaire statistique du sous-secteur de l'élevage, des pêches et des industries animales*, édition 2021, https://ins-cameroun.cm/wp-content/uploads/2023/06/ANNUAIRE-STATISTIQUE-MINEPIA_07-06-22.pdf.
- 28 Loi n° 2023/019 portant loi de finances de la République du Cameroun pour l'exercice 2024.
- 29 See Section 6 and note 38.
- 30 Meliedje, T. (2024) 'Pêche illicite : ce que fait le Cameroun pour sortir du carton rouge', *News du Camer*, 13 June 2024, <https://www.newsducamer.com/peche-illicite-ce-que-fait-le-cameroun-pour-sortir-du-carton-rouge/>.
- 31 Cameroonian law lacks a clear legal basis for the suspension or withdrawal of fishing licences, but such a penalty is envisaged by applicable laws and regulations: see Law no. 94/01 establishing Forestry, Wildlife and Fisheries Regulations, Art. 65; Décret n° 75-528 déterminant les modalités d'exploitation de bateaux de pêche à moteur au Cameroun, Art. 27.
- 32 EJF (2018) *Out of the shadows: Improving transparency in global fisheries to stop illegal, unreported and unregulated fishing*, <https://ejf.org/reports/out-of-the-shadows-improving-transparency-in-global-fisheries-to-stop-illegal-unreported-and-unregulated-fishing>.
- 33 MINEPIA (2023), Liste des navires de pêche ayant reçu la licence de pêche côtière en 2023, <https://www.minepia.cm/download/liste-des-navires-ayant-recus-la-licence-de-peche-cotiere/>.
- 34 MINEPIA (2024), État des lieux des licences de pêche octroyées en 2024, <https://www.minepia.cm/download/liste-des-navires-de-peche-2024/>.
- 35 <https://globalrecord.fao.org/> (accessed 3 August 2024).
- 36 Cited in Beseng, M. (2019) 'Cameroon's choppy waters: The anatomy of fisheries crime in the maritime fisheries sector', *Marine Policy*, 108, 103669, <https://doi.org/10.1016/j.marpol.2019.103669>.
- 37 Décret n° 95-413-PM fixant certaines modalités d'application du régime de la pêche, Art. 6.
- 38 Despite repeated requests to the competent authorities, EJF was unable to obtain a copy of the relevant regulation (Décision n° 024/MINEPIA du 15 février 2006 fixant les modalités de la surveillance satellitaire des navires de pêche).
- 39 United Nations Treaty Collection, 'Agreement for the Implementation of the Provisions of the United Nations Convention on the Law of the Sea of 10 December 1982 relating to the Conservation and Management of Straddling Fish Stocks and Highly Migratory Fish Stocks, Status as at 10-10-2024', https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtidsg_no=XXI-7&chapter=21&clang=en (accessed 10 October 2024).
- 40 FAO Treaties Database, 'Agreement to Promote Compliance with International Conservation and Management Measures by Fishing Vessels on the High Seas', <https://www.fao.org/treaties/results/details/en/c/TRE-000023/> (accessed 10 October 2024).
- 41 FAO Treaties Database, 'Agreement on Port State Measures to Prevent, Deter and Eliminate Illegal Unreported and Unregulated Fishing (PSMA)', <https://www.fao.org/treaties/results/details/en/c/TRE-000003/> (accessed 10 October 2024).
- 42 IMO (2024) 'Status of Conventions – Ratifications by State', <https://www.imo.org/en/About/Conventions/Pages/StatusofConventions.aspx> (accessed 10 October 2024).
- 43 ILO (2024) 'Ratifications of C188 - Work in Fishing Convention, 2007 (No. 188)', https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:1130:0::NO::P11300_INSTRUMENT_ID:312333 (accessed 10 October 2024).
- 44 Agreement for the Implementation of the Provisions of UNCLOS Relating to the Conservation and Management of Straddling Fish Stocks and Highly Migratory Fish Stocks, 4 August 1995, entered into force 11 December 2001, https://treaties.un.org/Pages/ViewDetails.aspx?src=IND&mtidsg_no=XXI-7&chapter=21&clang=en.
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- 47 Cape Town Agreement of 2012 on the Implementation of the Provisions of the Torremolinos Protocol of 1993 Relating to the Torremolinos International Convention for the Safety of Fishing Vessels, 11 October 2012 (not yet in force), <https://wwwcdn.imo.org/localresources/en/About/Conventions/Documents/Consolidated%20text%20of%20the%20Agreement.pdf>.
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- 49 Coalition for Fisheries Transparency (2023) *The Global Charter for Fisheries Transparency*, <https://fisheriestransparency.net/wp-content/uploads/2024/10/Coalition-for-Fisheries-Transparency-Global-Charter-2024-EN.pdf>.
- 50 Concerning Cameroonian-flagged fishing vessels operating outside national waters, implement EJF's recommendations outlined in the document entitled 'An EJF briefing prepared for the Government of Cameroon: An analysis of Cameroon's fishing and fishing-related fleet', which include deregistering Cameroonian-flagged fishing and fishing-related vessels operating outside national waters, informing all relevant authorities and bodies of the decision taken to deregister such vessels, and closing Cameroon's vessel registry to foreign-flagged fishing vessels.



Environmental Justice Foundation (EJF)
Gensurco House, 3-5 Spafield Street
London, EC1R 4QB, UK
tel: +44 (0) 207 239 3310
info@ejfoundation.org, ejfoundation.org
Registered charity No. 1088128

