Coalition for Fisheries Transparency

Criminal catches

How to stop the supply of illegal seafood to the UK

Coalition for Fisheries Transparency

ENVIRONMENTAL JUSTICE FOUNDATION
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The **Coalition for Fisheries Transparency** is a global network of fifty civil society organisations that work together to improve transparency and accountability in fisheries governance and management. The Environmental Justice Foundation (EJF) and Open Seas are leading the Coalition's efforts in the United Kingdom to accelerate the adoption of the Principles of the Global Charter for Fisheries Transparency. Their work aims to help the UK champion effective fisheries governance globally to strengthen the fight against illegal, unreported and unregulated (IUU) fishing.

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Acronyms

AIS	Automatic Identification System
DWF	Distant water fleet
Defra	Department of Environment Food and Rural Affairs
EEZ	Exclusive Economic Zone
EU	European Union
IEZ	Inshore Exclusion Zone
IUU fishing	Illegal, unreported and unregulated fishing
KDE	Key data element
MMO	Marine Management Organisation
NOAA	National Oceanic and Atmospheric Administration
OTs	Overseas Territories
PHAs	Port Health Authorities
REM	Remote Electronic Monitoring
RFMO	Regional Fisheries Management Organisation
SGSSI	South Georgia and South Sandwich Island
SWIO	Southwest Indian Ocean
UK	United Kingdom
VMS	Vessel Monitoring System
ZOF	Zhejiang Ocean Family Co., Ltd.

Glossary

Automatic Identification System - a device that broadcasts a vessel's location, identity, course and speed.[1] AIS is a safety-at-sea measure that is mandatory for larger ships, including many, but not all, commercial fishing vessels. AIS data is accessible to the public.

Carding system - A formal warning and sanctioning system used by the EU to hold non-EU states accountable[2] when they fail to adequately prevent and deter IUU fishing in their waters or fleets, as required under international law.

Catch certificate - Certification to prove that a seafood consignment has been caught under a legal fishing regime.[3]

Distant water fishing - fishing done by a country beyond its area of jurisdiction, including on the high seas.[4]

EU IUU Fishing Coalition - A coalition composed of the Environmental Justice Foundation (EJF), Oceana, The Nature Conservancy, The Pew Charitable Trusts, and WWF which are working together to promote EU leadership in improving global fisheries transparency and governance to end IUU fishing.

Exclusive Economic Zone - The area beyond a nation's territorial sea over which it has jurisdiction.[5]

Illegal, unreported and unregulated (IUU) fishing - Any unauthorised fishing activities conducted in breach of national, regional, or international rules or obligations. It includes fishing without a licence, under-reporting catch, catching prohibited species, operating with illegal fishing gear, or fishing in marine protected areas or areas reserved for small-scale fishers.

IUU Fishing Risk Index - The IUU Fishing Risk Index provides a measure of the likelihood that states are exposed to and effectively combat IUU fishing. The Index allows countries to be benchmarked, ranked and assessed for their vulnerability, prevalence and response to IUU fishing.

IUU Regulation - Also referred to as Council Regulation 1005/2008, this is the piece of EU legislation the UK transposed into its own law after Brexit. It is designed to establish a system to prevent, deter and eliminate illegal, unreported and unregulated fishing. It was updated by Regulation (EU) 2023/2842 in late 2023.

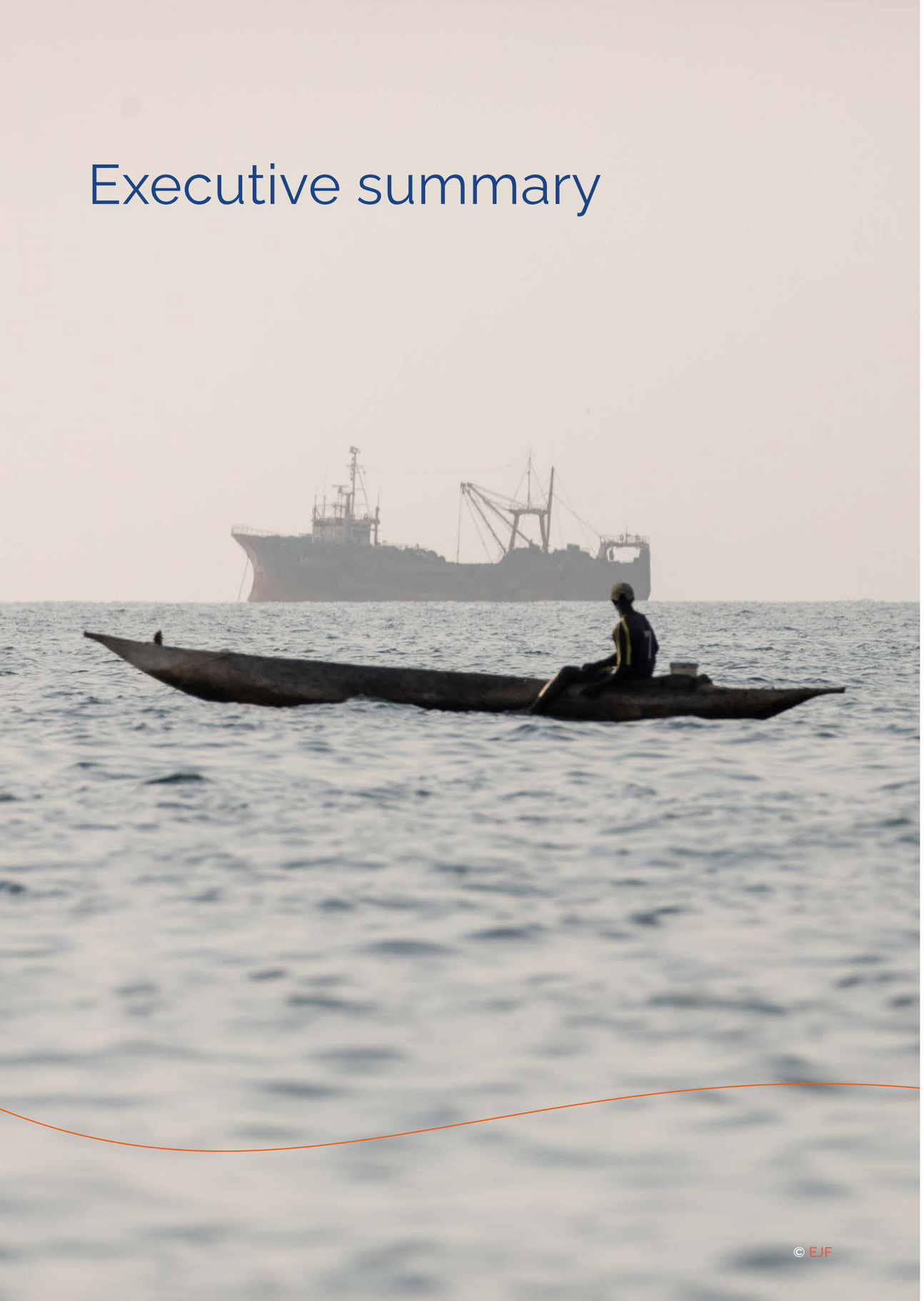
Regional Fisheries Management Organisations - International organisations developed to sustainably manage migratory or straddling fish species through the establishment of binding conservation and management measures.[6]

Remote Electronic Monitoring - An on-board monitoring system including cameras, GPS and sensors.[7]

Squid jigger - A fishing technique which uses specialised barbless lures, called squid jigs, which are jigged up and down using machines to imitate the movement of prey. The process often uses bright overhead lights to attract the squid.[8]

Vessel Monitoring System - Fisheries monitoring system that broadcasts a vessel's position at intervals, typically accessible to government regulators or other fisheries authorities.[9]

Executive summary



Illegal, unreported and unregulated (IUU) fishing is driving the collapse of fish populations, and jeopardising marine ecosystems, coastal communities, and food security around the world. This global issue, which affects both the UK's seafood imports and seafood sourced from its own waters, is of major concern to the UK. In terms of its international sourcing, the UK is at significant risk of receiving seafood consignments that have been caught illegally because of its dependence on imports from states implicated in IUU fishing. As IUU fishing is often closely linked with serious human rights abuses, including forced, bonded and slave labour, this reliance on high-risk imports may also mean UK consumers are unknowingly purchasing seafood tainted by abuse.

To address this, the UK must implement robust and comprehensive import control measures. Addressing concerns around international supply chains must go hand in hand with rigorous enforcement of the UK's own fishing regulations. While both are crucial for protecting consumers from fish caught through destructive and abusive means, this report focuses solely on the UK's seafood import controls and how to enhance them.

This report reveals the UK market's potential exposure to IUU fishing through its seafood imports. Case studies of high risk trade are supplemented by analysis of the level at which the UK is checking the legality of imports. When the UK left the European Union (EU) it retained vital legislation designed to protect its market from the products of IUU fishing via its import controls. This report's findings indicate that UK consumers are at significant risk of buying illegally caught seafood due to insufficient implementation of these measures. In addition, unlike the EU, the UK has not strengthened its import controls in recent years. Moreover, whereas the UK was once required to regularly monitor and share data on IUU checks undertaken and capacity to do so at the UK border, since Brexit it has since ceased to do so, leaving the government blind to the full extent to which import controls are actually being implemented.

Enhanced transparency measures, greater collaboration and more sophisticated targeting of checks at ports of entry are key to preventing UK consumers unwittingly buying illegally-caught seafood. The UK Government has expressed support[10] for the Global Charter for Fisheries Transparency,[11] and is already partially-implementing a number of its measures. However, to achieve a core Principle of the Charter, Principle 7 on seafood traceability from boat to plate, the UK must enhance the data required on catch certificates, digitise its system, and report annually and publicly on the checks it is undertaking. Port Health Authorities (PHAs) must also fully utilise a risk-based approach to verifications and inspections to ensure that IUU-caught fish does not enter the UK undetected.

To support implementation of the catch certification scheme, and help drive reforms in fisheries governance globally, the UK should implement a system to warn, and in extreme cases, block seafood imports from states that are failing to take sufficient action to combat IUU fishing, in accordance with their obligations under international law. This could follow a similar format to the EU's well-established carding system,[12] which allows for the issuance of 'yellow cards' as a warning and 'red cards' to block market access for states that are failing to address IUU fishing. This report finds that there are many countries that could be incentivised to improve their efforts by the use of a carding system that leverages the UK's valuable seafood market. Crucially, as in the EU, a carding system would provide a framework for the UK to enter into dialogue with importing countries on their systems for addressing IUU fishing, ensuring that flag states have the necessary traceability and IUU control measures in place to ensure the legality of seafood destined for the UK market.

Robust implementation of the UK's catch certificate scheme, and monitoring and reporting on catch certificate data would, in turn, enhance and inform application of a future carding system in the UK. Information obtained from flag states as part of detailed, risk-based verifications, combined with centrally held data on seafood consignment refusals, can feed into determinations that states are failing to comply with their international obligations to tackle IUU fishing. Effective use of such a system has been shown to have a positive ripple effect globally, driving positive bilateral dialogues with third countries and working with them to help improve their fisheries management and governance. A carding system would also incentivise states that export seafood to the UK to comply with its import control requirements.

The UK Government recognises IUU fishing as a 'significant threat to ocean ecosystems, coastal communities and global food supplies'[13] and has signalled its intent to lead internationally as co-founder of the IUU Action Alliance of countries coalescing around this issue.[14] To back up the Alliance's commitment to ending IUU fishing and tackling its associated human rights abuses – and to deliver on the UK's goals for a healthy ocean – the UK must take action at home. This includes introducing measures at ports of entry to identify, sanction, and deter illegal activity, and ensuring strong enforcement of fisheries regulations in UK waters.

Around the world, momentum is growing for strengthened seafood import control schemes. The EU, US, South Korea and Japan have made progress in developing and expanding their catch documentation requirements in recent years whilst a draft report on IUU import control measures has been produced in Australia,[15] highlighting the current government's ambitions in this area. The UK must not allow itself to fall behind and become a dumping ground for illegal seafood due to weak implementation of its own import controls. Ultimately, the combination of strengthened import controls, increased capacity and utilisation of a carding system will address this challenge head on. These low cost solutions will allow the UK to identify and, importantly, deter IUU fishing in global fisheries, support responsible fishers and help ensure that UK consumers' plates are free from seafood caught illegally or tainted by human rights abuses.

> The UK must not allow itself to become a dumping ground for illegal seafood due to weak implementation of its import controls.

Key findings

- In 2024, the UK imported 65,056 tonnes of seafood from China[16] – a flag state identified by international observers to be high-risk for IUU fishing[17] – without verifying a single Chinese catch certificate.[18] Every year, the UK receives around a thousand[19] catch certificates for imports of seafood caught by Chinese fishing vessels; however, records show that the UK has only refused four seafood consignments from China on IUU fishing grounds since 2012.[20]

- Between 2021 and 2023, the UK did not verify or refuse a single catch certificate originating from Russia, allowing this high-risk seafood to enter the UK market largely unobstructed.[21] While direct imports of Russian-caught seafood fell to nearly zero in 2024 following the imposition of tariffs, indirect imports via third countries have continued, with whitefish caught by Russian-flagged vessels still sold widely in the UK, according to industry reports.[22]

- Between 2021 and 2024, the UK imported 205,060 tonnes of seafood from 'carded' countries[23] – those deemed by the EU not to be sufficiently tackling IUU fishing – but verified[24] just nine carded-country catch certificates: Ecuador (5), Ghana (1), Panama (1), and Vietnam (2). During this period, only two carded-country imports – from Vietnam in 2023 and another from Ghana in 2024 – were refused.[25]

- In 2024, more than a quarter of UK seafood imports came from countries that had been yellow-carded, or that were ranked among the top five countries globally for IUU fishing risk.[26] These included China, Ecuador, Ghana and South Korea.

- Since 2020, there has been a sharp fall in the number of flag state import verifications that have been undertaken with a view to ensuring that seafood caught was not tainted by IUU fishing and is in compliance with relevant fisheries regulations and management measures, with average annual verifications declining threefold during the period 2021-24 compared to 2016-19.[27] Much of the capacity for reporting, coordination and oversight of implementation of IUU import controls in the UK has also been lost since Brexit.

Recommendations

To combat the global trade in illegal seafood, strengthen fisheries governance, and help end human rights abuses at sea, **the Coalition for Fisheries Transparency (CFT) recommends that all governments, including the UK, fully implement the provisions of the Global Charter for Transparency** and advance each of its principles in a time-bound, proven manner.

Based on the findings of this report, the CFT further recommends the following to the UK Government:

To improve import control measures

- Significantly increase the number of verifications of catch certificates and, where necessary, refusals of seafood consignments.

- Implement a digitised system to receive and log catch certificates.

- Integrate a set of 17 key data elements recommended globally as best practice (listed in Table 8) into the documentation required to import seafood into the UK.

- Fully utilise a risk-based approach to the verification of catch certificates, which should include requesting original data, such as vessel positions and relevant fishing authorisations, from the flag state authority that validated the catch certificate to demonstrate legality.

- Ensure physical inspections of freight consignments are targeted effectively as part of a comprehensive import verification process, based on the application of risk criteria.

- Require Port Health Authorities to report annually on the number of catch certificates received, verified, and refused, following the reporting format previously followed by the UK under the EU IUU Regulation, and ensure these reports are made public.

- Ensure Port Health Authorities immediately notify the Marine Management Organisation when a seafood consignment is refused under the UK's IUU Regulation.

- Strengthen capacity to detect and deter human rights abuses by requiring importers to report labour-related data elements (Table 11).

To combat IUU fishing and drive positive reforms globally

- Operationalise a carding system that allows for the issuance of 'yellow cards' as a warning and, in extreme cases, 'red cards' to block market access for states failing to take action to combat IUU fishing in line with their obligations under international law.

- Within the framework of a carding system, maintain active dialogue with countries at risk of, or having been issued, yellow or red cards for failing to effectively combat IUU fishing, with a view to supporting timely and robust reforms in their systems of fisheries governance.

- Enhance information and intelligence-sharing with partner states, particularly major market states with comparable import control schemes.

To support the implementation of these recommendations

- Ensure Port Health Authorities, the Marine Management Organisation and the Department for Environment, Food and Rural Affairs are adequately funded to enhance their capacity.

- To ensure consistency with – and avoid undermining – its international ambitions, the UK must prioritise eradicating illegal, unreported and unregulated (IUU) fishing in its own waters.

1. Introduction

What is illegal, unreported and unregulated (IUU) fishing?

Illegal fishing refers to fishing that takes place in contravention of applicable laws and regulations including those adopted at regional and international level, for example, fishing by a vessel flagged to an RFMO member state which is carried out in contravention of RFMO conservation and management measures.

Unreported fishing refers to unreported or misreported fishing activities in contravention of applicable laws and regulations.

Unregulated fishing refers to fishing activities that take place in areas without conservation or management measures where these are conducted in a manner inconsistent with conservation responsibilities under international law, or that are conducted in RFMO-managed areas by vessels without nationality or flagged to non-RFMO member states in a manner that is inconsistent with RFMO conservation and management measures.[28]

Illegal and unreported fishing is the third most profitable natural resource crime, after illegal logging and mining.

Illegal, unreported and unregulated (IUU) fishing has pushed our global ocean to a crisis point. Nearly 38% of fisheries are now considered overfished, increasing from just 10% in the mid-1970s, driven in large part by the widespread illegal fishing operations that pillage the ocean at an industrial scale.[29] The annual volume of IUU-caught fish has been estimated to be between 11 and 26 million tonnes, worth between US$10 to 23.5 billion.[30] More recent estimates have found that the total annual economic loss due to illicit fishing activity and trade may range as high as US$50 billion.[31] Even under more conservative estimates that exclude the value of unregulated fishing, illegal and unreported fishing is the third most profitable natural resource crime, after illegal logging and mining.[32]

IUU fishing is pushing the ocean well beyond its sustainable limits, driving the collapse of ecosystems and degradation of the wider marine environment. It not only impacts commercially-targeted fish species, but also marine megafauna such as sharks, rays, turtles and marine mammals, as well as seabirds, which are caught incidentally – and sometimes deliberately – by IUU fishing operations. Estimates put the value of the global shark finning trade at US$1.5 billion[33], while global fisheries are the leading cause of marine mammal mortality[34]. EJF investigations have documented vessels engaged in finning of protected shark species such as hammerheads and thresher sharks[35] (both listed in CITES Appendix II[36]), as well as the killing of dolphins for bait[37] and false killer whales for their teeth[38].

Investigations have shown that human rights and labour abuses are rife on fishing vessels that are also engaged in illegal and destructive fishing practices such as shark finning.

IUU fishing is also associated with serious and systemic human rights abuses and other labour violations, as illegal operators seek to cut operating costs and turn a profit in the face of dwindling catches.[39] Investigations have shown that human rights and labour abuses are rife on fishing vessels that are also engaged in illegal and destructive fishing practices such as shark finning.[40] Vulnerable crew often find themselves at sea for months or even years at a time, subjected to conditions of modern slavery – including physical and psychological abuse, debt bondage, dilapidated living conditions, relentlessly long working hours and being deprived of clean food and water.[41]

Countries in the Global South are impacted most severely by IUU fishing. Estimates suggest that Asia, Africa and South America suffered around 85% of the global catch lost to likely illicit trade, equating to revenue losses to the legitimate trade system of between US$7.3 to US$14.0 billion per year.[42] This threatens some of the most marginalised communities in the world and the three billion people, mostly in the Global South, who have a significant portion of their food security and nutrition needs met by seafood.[43]

The UK is a key market state for seafood globally, importing 789,210 tonnes of seafood in 2024 valued at £3.8 billion, equating to 2.4% of global import value.

The UK is a key market state for seafood globally, importing 789,210 tonnes of seafood in 2024 valued at £3.8 billion,[44] equating to 2.4% of global import value.[45] It is heavily reliant on imports, which in 2023 were four and a half times higher than the value of fish landed into the UK.[46] Salmon, tuna (skipjack), whitefish (cod, haddock and Alaska pollock), and shrimp are the most consumed seafood products in the UK, accounting for 56% of seafood import volume in 2024.[47] Around 70% of seafood consumed in the UK is sold in the retail market, with the remaining sold by food services such as fish and chip shops, restaurants and caterers.[48]

With a view to stemming the flow of seafood caught through IUU fishing to the UK market, the UK implements a catch certification scheme which was introduced around 15 years ago under the EU Regulation to prevent, deter and eliminate IUU fishing (Council Regulation (EC) No. 1005/2008). The UK has retained this catch certification scheme following Brexit, which requires that all seafood consignments falling within the scope of the UK IUU Regulation[49] be accompanied by a catch certificate validated by the flag state of the fishing vessel that caught the fish, attesting that the seafood was caught in compliance with applicable rules and management measures. On the importing side, the UK competent authorities – the Port Health Authorities (PHA) and Marine Management Organisation (MMO) – are required to conduct checks of the catch certificates received, and based on a risk assessment, conduct further, in-depth verifications to confirm the legality of imported seafood, including through enquiries to the relevant flag state authorities.

This report aims to assess the UK's implementation of seafood import controls under the UK IUU Regulation, with a view to examining, in particular, the adequacy of risk-based verifications of catch certificates following the UK's exit from the EU in January 2020. The analysis is based on information received from UK authorities provided under the Environmental Information Regulations 2004, as well as historical data on implementation of import controls contained in the UK's Biennial Reports to the European Commission obtained through previous access to information requests. This information is analysed in the context of the risk that seafood imported into the UK may be derived from IUU fishing, with case studies provided in this report of high-risk seafood flows to the UK market. Recommendations are made to the UK Government for how to strengthen implementation of its import controls, enhance transparency and drive improvements in global fisheries governance, ultimately ensuring that UK consumers are not inadvertently supporting illegal and unsustainable fishing practices, and associated human rights abuses, through their seafood purchases.

It is noted that, although this report focuses on the importation of IUU-caught fish, IUU fishing remains a prevalent issue in the UK's waters as has been repeatedly identified by Coalition for Fisheries Transparency member organisation, Open Seas[50], and others[51] in recent decades. Ultimately, the UK must apply the same transparency principles to its domestic fleet to ensure IUU fishing is eradicated in its wider seafood supply chain. This further underlines just how critical it is that the UK advances all of the principles in the Global Charter for Fisheries Transparency (**Box 1**) in order to end IUU fishing both at home and abroad.

High-value tuna being offloaded in Montevideo, Uruguay.

Box 1: the Global Charter for Fisheries Transparency

Transparency is the cornerstone of the fight against IUU fishing and the achievement of sustainable, legal and ethical global fisheries. The opaque nature of the global fishing industry is a key enabler of illegal fishing and associated crimes, such as corruption, human rights and labour abuses, and fraud, with unscrupulous actors often evading sanction and regulatory oversight.[52]

The Coalition for Fisheries Transparency is calling on governments around the world to adopt and implement the ten principles of the Global Charter for Fisheries Transparency.[53] These measures can be implemented immediately and at low-to-no-cost, allowing for the effective monitoring of who is catching what, where, when and how. Implementation of the Global Charter would be transformative for the sustainability, health and legality of fisheries worldwide, helping to end the cycle of environmental and human rights abuses associated with IUU fishing.

By embracing and implementing the Charter's ten principles, governments can demonstrate their commitment to promoting sustainable fishing practices, protecting marine resources, and advancing participation and equity in the fishing sector. They also stand to benefit by increasing the competitiveness of their fisheries products in the global market and safeguarding their crew, consumers, and public from illicit behavior by external actors in the seafood supply chain.[54]

The UK Government has taken an important first step in welcoming the Charter's ten principles[55] and is already partially-implementing most of them. The CFT now urges the UK Government to prioritise closing the gaps between where the UK currently stands and full implementation of the Charter. The UK has an opportunity to become a global leader in responsible fisheries governance and set a gold standard in fisheries transparency in doing so.

Principle 7 of the Charter is central to this report. It calls for governments to mandate the adoption of robust control systems that ensure seafood is legal and traceable from boat to plate, conforming to relevant catch management measures and making key data elements of those measures publicly available. Though the key data elements of the UK's catch certificate are publicly available, much work remains to be done to ensure the UK's import control systems are sufficiently robust. Doing so will help ensure the legality of seafood products entering the UK's market by enabling authorities to screen out illegally-caught consignments and incentivise states that export to the UK to comply with their international obligations to combat IUU fishing.

While there is also scope for strengthening UK requirements to ensure the robust and effective tracking of seafood from boat to plate, for example, in terms of requiring more detailed product labelling and systems to ensure batch integrity, a detailed examination of traceability requirements is not a focus of the present report.

Global Charter for Fisheries Transparency

Vessel information

1. Require all fishing vessels, refrigerated transport vessels and supply vessels (hereafter 'fishing vessels') to obtain unique identification numbers and also provide them to the FAO Global Record, RFMOs and other relevant bodies.
2. Publish comprehensive and up-to-date lists of fishing vessel licenses (including key vessel information), authorizations, subsidies, official access agreements and sanctions (for fisheries and labor offenses) and also supply this information to the FAO Global Record.
3. Make public the information on beneficial ownership of vessels.
4. Stop the use of flags of convenience by fishing vessels by enforcing the UNCLOS Article 91 requirement for a genuine link between vessels and their flag state, and prevent vessels from engaging in illegal fishing and associated crimes regardless of their flag and punish the vessel(s) that do.

Fishing activity

5. Require vessel position to be public (by sharing VMS, or sharing other non-public systems or mandating AIS).
6. Ban transferring fish between boats at sea – unless pre-authorized, carefully monitored and publicly logged.
7. Mandate the adoption of robust control systems that ensure seafood is legal and traceable from boat to plate, conforming to relevant catch management measures whose key data elements are made publicly available.

Governance and management

8. Ratify and comply with international instruments that set clear standards for fishing vessels and the trade in fisheries products, including FAO PSMA, ILO Fundamental Principles and Rights at Work and ILO C188, and IMO Cape Town Agreement.
9. Publish all collected fisheries data and scientific assessments in order to facilitate access to information for small-scale fishers, fish workers, indigenous communities, industry associations, and civil society in developing fisheries rules, regulations, subsidies and fisheries budgets, and decisions on access to fisheries resources. Make these processes, policies, and decisions easily accessible to the public and enforcement agencies.
10. Collect and verify robust data on crew identification and demographics (including nationalities, age, race, and gender), contractual terms, recruitment agencies, location and means of joining vessels, and conditions on vessels as well as publish this information in aggregate form.

Box 2: The fight against IUU fishing in UK OTs' waters[57]

A significant portion of the UK EEZ is contained within the 14 British Overseas Territories (OTs), spanning the Mediterranean, Indian and Pacific Oceans, South Atlantic, and the wider Caribbean. The OTs are sites of significant biological importance, home to up to 90% of the UK's known endemic biodiversity.[58] However, like UK waters closer to home, these areas are also impacted by IUU fishing, as demonstrated by the case of the MV NIKA, detailed below.

On 31 May 2019, a bulk carrier called the 'Jewel of Nippon' appeared on AIS in the South Georgia and South Sandwich Island (SGSSI) Maritime Zone. A bulk carrier – a vessel designed to transport cargo – was rare at the location, and its AIS transmissions also indicated behaviour consistent with fishing activity within the SGSSI EEZ. Licensed fishers in the area visually corroborated this finding, and further investigations revealed that the vessel transmitting as the 'Jewel of Nippon' on AIS was in fact the 'MV NIKA' – a Panamanian-flagged, Korean-owned fishing vessel.

Through physical patrols and international intelligence-sharing, the MV NIKA was eventually captured and taken into custody in Indonesia. Investigations found that it was owned by the same company as other blacklisted vessels known to be involved in illegal fishing, and fishing gear and fish processing facilities were found onboard.

The MV NIKA had managed to remain undetected through a system of multi-layered deception. It had falsified registration documents and used AIS data from the Jewel of Nippon to disguise its location, hiding its unlicensed fishing from authorities and continuing to operate despite its association with other blacklisted vessels.

As a result of these infringements, the vessel's captain was found guilty of violating Indonesian fisheries law, and the owners were fined over US$21,000. The vessel and its equipment were forfeited, and the MV NIKA was added to an international IUU Vessel List for 2020/21,[59] leading to it being removed from the Panamanian fleet registry.

Although a successful outcome, the complexity of the MV NIKA's operations demonstrates the opacity of the fisheries sector at large. Without internationally aligned efforts to address fisheries transparency, bad actors will continue to exploit weak points and fish under the radar, putting marine life and sustainable livelihoods at risk. This issue directly impacts the UK OTs, meaning it is in the UK's territorial interests to rapidly implement thorough and comprehensive transparency measures that deter and sanction these illegal and destructive practices.

The MV NIKA at sea. Credit: Marine Management Organisation, 2021

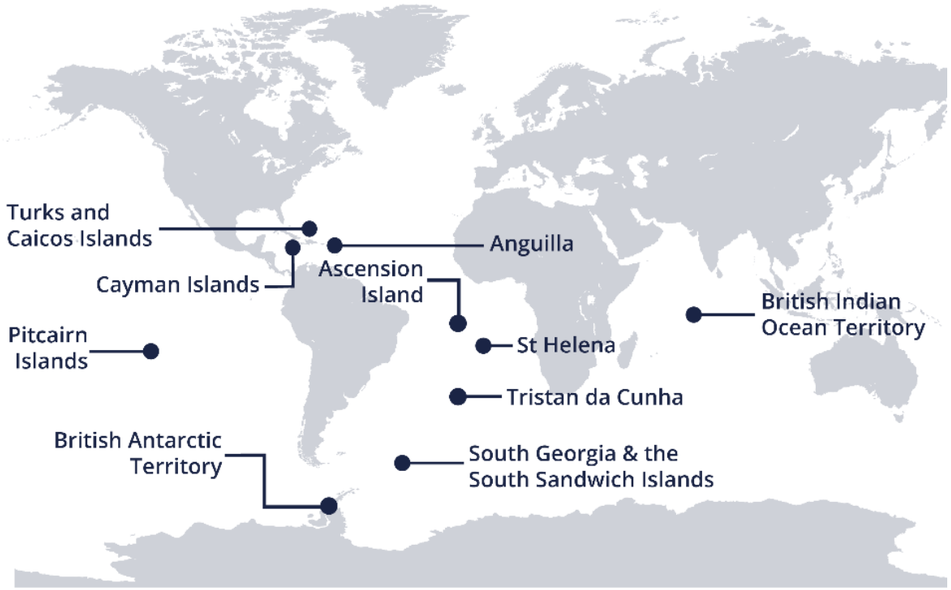
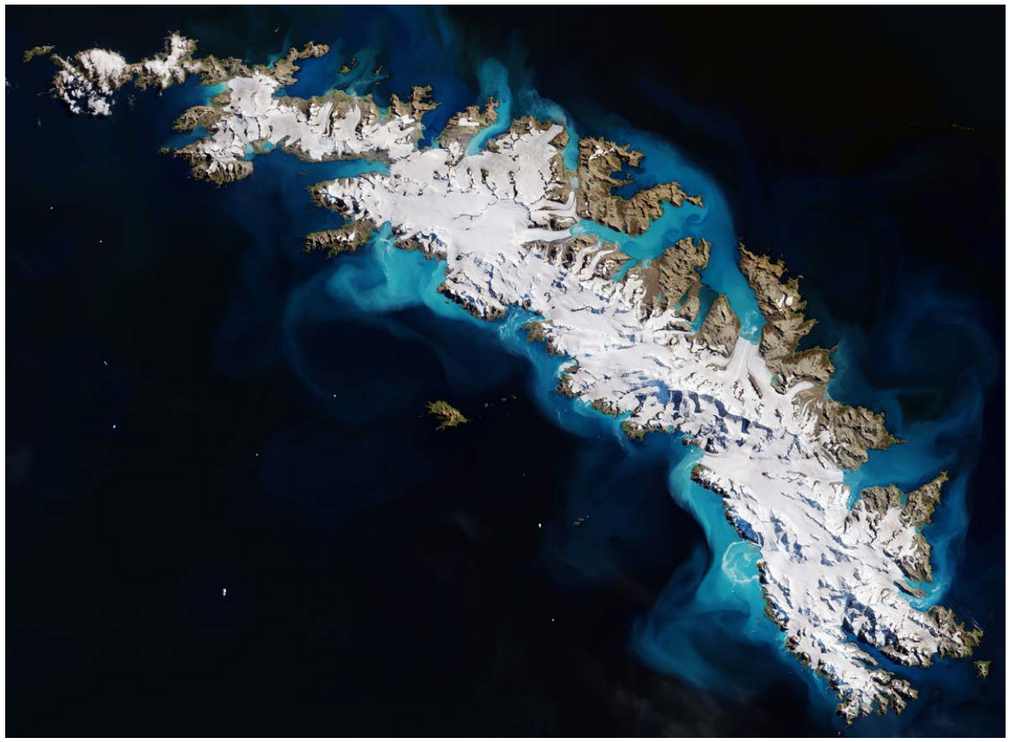


Figure 1: Map of the UK Overseas Territories (OTs) involved in the UK's Blue Belt Programme[56]



Aerial image showing South Georgia and part of the surrounding UK EEZ. Credit: European Space Agency / CC BY-SA 2.0

Tuna loin for sale at a UK retailer.

2. Implementation of the IUU Regulation in the UK

2.1. The UK's seafood import controls

Verifications of data contained in catch certificates at the UK border

The UK retains the European Union (EU) IUU Regulation it applied when it was a part of the EU.[60] This requires all consignments of seafood that fall within the scope of the Regulation (broadly excluding freshwater and ornamental fish, products derived from aquaculture, and bivalve molluscs) to be accompanied by a catch certificate that is validated by the flag state of the catching vessel. A catch certificate is a formal document that certifies that the fisheries products being exported to the UK have been caught legally. Catch certificates accompanying seafood imports into the UK contain the following information:

- The vessel had a valid licence issued by the competent fishing authority of the flag state at the time the seafood was caught.
- The vessel was permitted to catch the species contained in the consignment.
- The vessel was authorised to operate in the area where the consignment was caught.
- The species, total weight and product being imported, and associated commodity code.
- Confirmation that the weight of the exported fish is not more than the original landed weight.
- Information on the transportation journey of the consignment.[61]

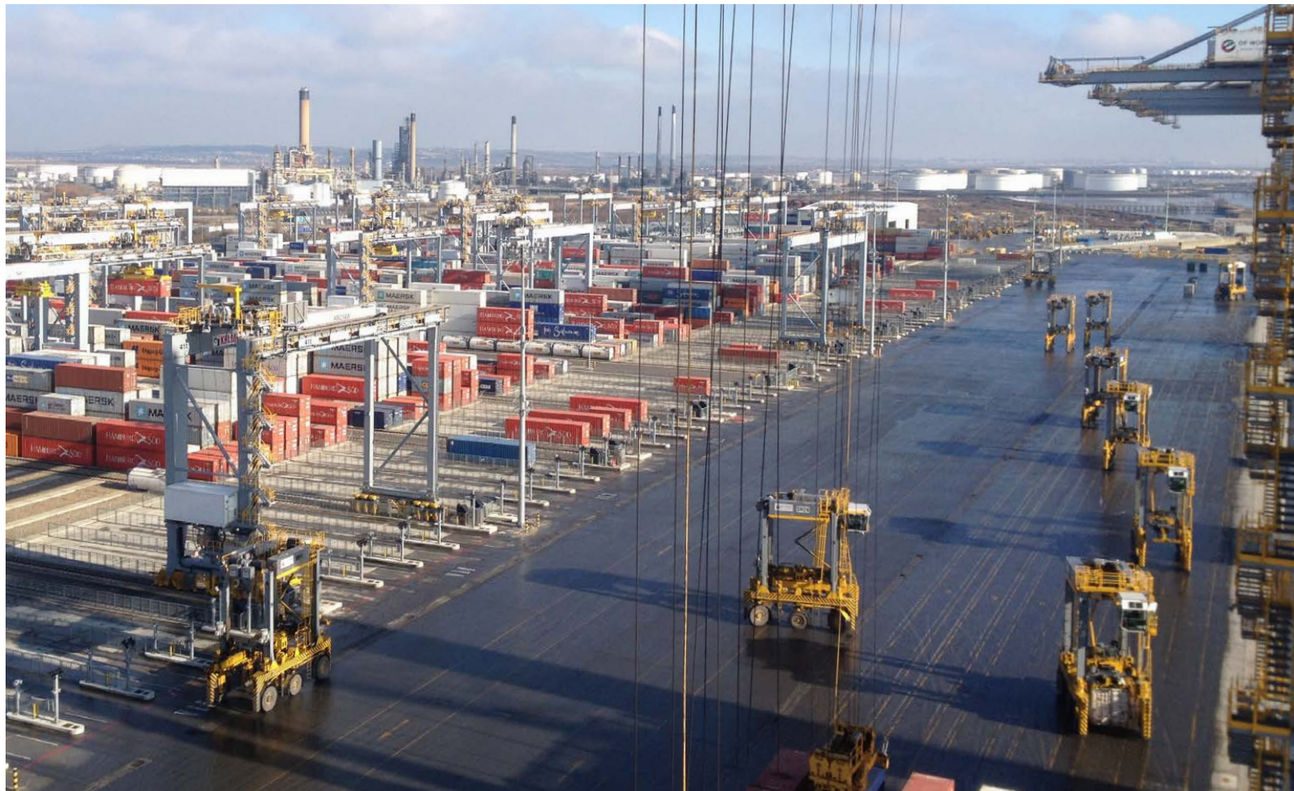
Under the IUU Regulation, the UK competent authorities are empowered to carry out all verifications considered necessary to prevent products stemming from IUU fishing from entering the UK.[62] The PHAs are responsible for carrying out standard documentary checks[63] and physical inspections of consignments at the UK border, while the MMO carries out formal verifications with third countries on behalf of PHAs. The Regulation requires that verifications are based on the risk that products were caught through IUU fishing,[64] although they are mandatory in certain circumstances, including where there are grounds to question the authenticity of a catch certificate or a fishing vessel has been reported in connection with presumed IUU fishing (e.g., through listing on an RFMO IUU vessel list).[65] Under Article 17(6) of the Regulation, the MMO may request the assistance of the flag state – or third country other than the flag state in the case of an indirect import – when carrying out catch certificate verifications. This may include requesting VMS data, logbook information and copies of licences to ascertain compliance with applicable rules and management measures, which has been shown to increase the likelihood of detecting IUU fishing.[66] Where, following an Article 17(6) verification request, the products are found not to comply with applicable conservation and management measures, or if there is no or insufficient response provided by the flag state or third country authority to the request, the PHAs are required to refuse import of the consignment.[67]

Physical inspections of consignments

Inspections are another key element of the UK's import control scheme and typically take two forms: (i) inspections of direct vessel landings or transshipments in ports, and (ii) inspections of seafood freight imports. The UK's IUU Regulation stipulates that a minimum of 5% of direct landings and transhipment operations by third country fishing vessels must be inspected by authorities.[68] The UK regularly met this target as an EU member state though it is unclear as to whether it has continued to do so since Brexit as authorities are no longer required to report on this, and the MMO was not able to provide this data on request. Nevertheless, analysis of the UK's historic patterns of direct landings and transhipments indicate that this mode of entry for seafood to the UK has been of lower risk for IUU fishing and on a much smaller scale than the UK's seafood freight imports.

The physical inspections of imported seafood consignments can be a useful tool in ensuring that information provided in catch certificates is correct and in preventing the importation of IUU products. Article 17(2) of the IUU Regulation empowers PHAs to conduct the physical examination of products and inspect means of transport, including containers and storage places for the products, as part of the catch certificate verification process. However, unlike for direct landings, there is no requirement for UK authorities to physically inspect a minimum proportion of freight consignments as part of the verification process.[69] It is currently unclear whether the PHAs carry out risk-based or random inspections of freight consignments as part of their catch certification verifications and, if so, the proportion of consignments that typically undergo such checks. Physical examination and testing of seafood products at the point of import has been shown to assist authorities in detecting IUU fishing.[70]

London Gateway Port / Department for Transport (DfT) / CC BY-NC-ND 2.0



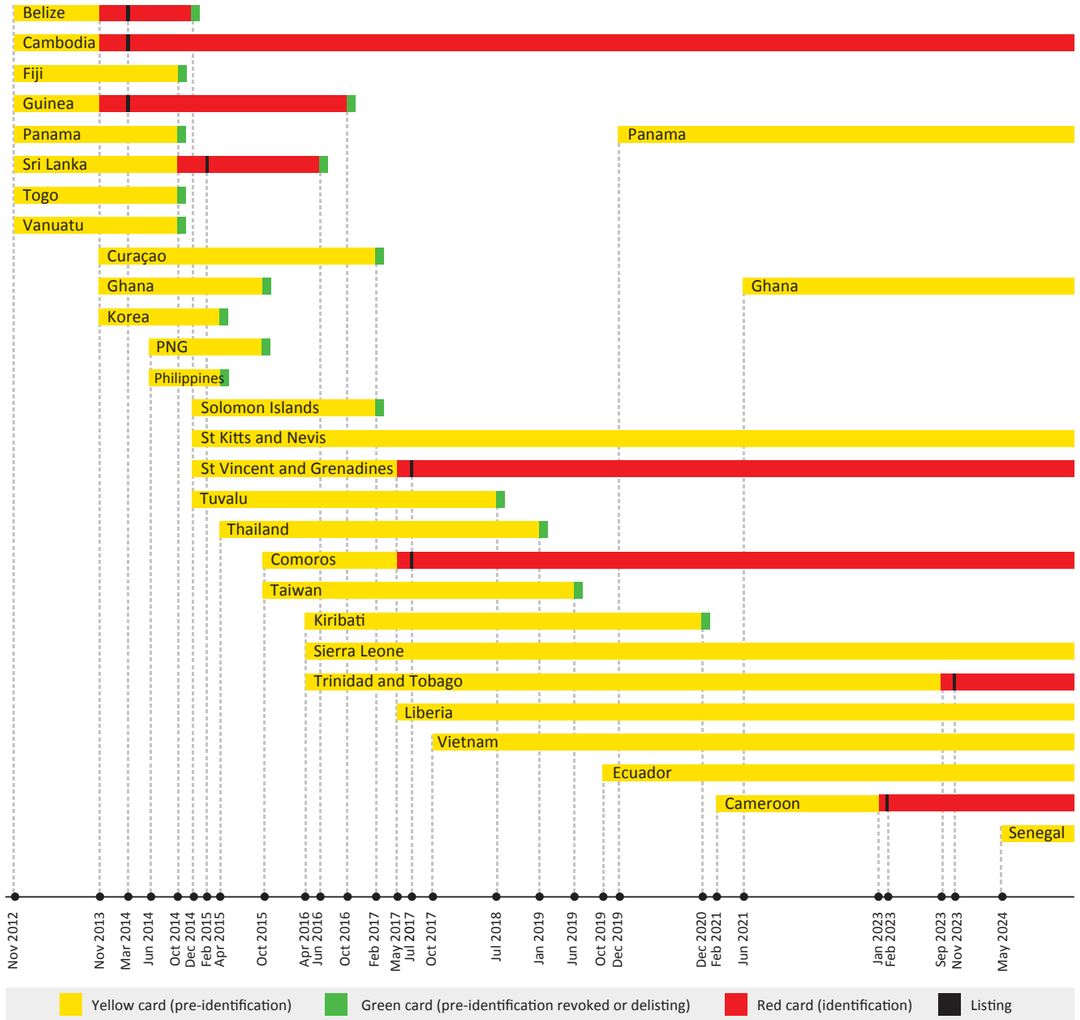
2.2. The EU carding system

The EU's carding system underpins its import control regime. It incentivises flag states to properly validate consignments being sent to Europe and is designed to drive improvements in measures to combat IUU fishing in third countries, through a system of dialogues, warnings and sanctions. Third countries that do not adequately fight IUU fishing in line with their international responsibilities will be issued with an official warning, or 'yellow card' by the European Commission. This initiates a formal dialogue between the third country and the Commission on the reforms needed to effectively address IUU fishing. If the reforms are not actioned in a reasonable timeframe, the Commission will issue a 'red card'[71] resulting in the imposition of sanctions, including trade bans and bans on EU vessels operating in the third country's waters.[72] Once a state has taken the necessary measures to address IUU fishing, it can be delisted and have its yellow or red card removed ('green-carded').

Since the start of the EU carding system, the European Commission has issued yellow cards to 27 countries and red cards to six countries.[73] 14 countries have been delisted and have had their cards removed following fisheries reforms (see **Figure 2**).[74]

The UK has retained trade restrictions with countries that were red-carded under the EU carding system at the time of its departure from the EU, namely Comoros, Cambodia, and Saint Vincent and the Grenadines.[75] However, the UK has not implemented trading restrictions with countries that have been red-carded since the UK left the EU in 2020, nor has it issued any further yellow or red cards to states exporting seafood to the UK. This represents a missed opportunity for the UK to drive fisheries reforms in countries that are major suppliers of seafood to the UK, and contribute to the global fight against IUU fishing.

Map of yellow, red and green carding decisions by the European Commission.[221]



Note: Adapted from European Parliamentary Research Service (2022)

Figure 2: Timeline of yellow, red and green carding decisions by the European Commission.[76]

Fish fingers consumed in the UK often contain processed whitefish from abroad (see case study 2). Credit: Marko Jan

3. Case studies of high-risk seafood and the UK market

The UK is heavily reliant on seafood imports to supply domestic demand, importing around 81% of its seafood consumption.[77] In 2023, the value of seafood imports was nearly four and a half times higher than the value of fish landed in the UK's ports.[78]

Analysis of available import data reveals that a significant proportion of seafood consumed in the UK is supplied by states at high risk of engaging in or supporting IUU fishing. In 2024, the UK imported 121,227 tonnes of seafood[79] with an import value of £552 million from countries that are currently[80] yellow-carded under the EU carding system, or that were ranked among the top five countries globally for IUU fishing risk based on compliance with their flag state responsibilities.[81] This means that, in 2024, more than a quarter of the total tonnage (26.4%) and value (24.2%) of UK seafood imports stemmed from countries at high risk of engaging in IUU fishing,[82] placing UK consumers at significant risk of encountering illegal and unethical seafood in restaurants and on supermarket shelves. **Table 1** provides data on imports to the UK from carded countries and states listed in the top 20 countries globally for IUU fishing risk based on compliance with flag state responsibilities.

The UK is an important destination for seafood exports from a number of carded countries, including from both Ghana and Ecuador, which received yellow cards in 2021 and 2019, respectively. For Ghana, this was its second yellow card, the first of which was revoked in 2015. In 2023, the UK was the most important market for tuna exports from Ghana in terms of value, and the leading destination for tuna processed in the country, accounting for 36.5% of processed tuna exports by volume and value.[83] In the same year, the UK was Ecuador's third most important trading partner for tuna, accounting for 9.5% of the country's tuna exports by value, worth around US $120 million.[84] The EU's decision to issue a yellow card to Ecuador was specifically related to poor control of its tuna fishing and processing industries.[85]

> In 2024, more than a quarter of the total tonnage (26.4%) and value (24.2%) of UK seafood imports stemmed from countries at high risk of engaging in IUU fishing.

A school of skipjack tuna, the species most commonly found in canned tuna. © Phillip Colla / Oceanlight.com

Table 1: High risk* states for IUU fishing and their exports to the UK

State	Weight (tonnes) of imports to UK in 2023**[86]	Value (million, £) of imports to UK in 2023**[87]	Weight (tonnes) of imports to UK in 2024**[88]	Value (million, £) of imports to UK in 2024**[89]	IUU risk index flag state score and ranking (2023)[90]	EU carding history[91]
China	58,908	278.38	65,056	267.91	4.21 (#2)***	-
Ecuador	24,023	98.69	27,657	109.19	2.58 (#16)	2019 - present
Vietnam	15,267	118.08	17,251	126.38	2.30 (#34)	2017 - present
Ghana	9,222	40.87	10,465	43.24	1.67 (#111)	2021 - present 2013 - 2015
Spain	6,810	56.97	6,621	59.58	3.21 (#7)	-
France	6,393	44.91	7,084	49.40	3.17 (#8)	-
India	6,270	32.35	5,681	23.87	2.75 (#15)	-
Indonesia	5,041	27.20	5,789	28.39	3.33 (#6)	-
Portugal	4,241	16.79	3,457	18.55	3.00 (#9)	-
Sri Lanka	1,776	14.58	2,089	16.78	2.92 (#12)	2014-2016 (red listed) 2012 - 2014 (yellow card)
South Africa	1,659	8.24	1,812	9.52	2.58 (#16)	-
Italy	693	7.70	3,802	22.29	2.54 (#19)	-
Egypt	289	0.97	217	1.34	2.58 (#16)	-
South Korea	273	2.54	413	3.18	3.67 (#5)	2013 - 2015 (yellow card)
Taiwan	164	1.37	188	1.56	4.17 (#3)	2015 - 2019 (yellow card)
Japan	132	2.42	150	2.62	2.92 (#12)	-
Russia	74	0.34	168	0.39	4.33 (#1)	-
Senegal	52	0.47	40	0.34	2.38 (#29)	2024 - present (yellow card)
Iran	23	0.03	0	0.00	3.00 (#9)	-
Panama	18	0.03	29	0.13	3.75 (#4)	2019 - present (yellow card) 2012 - 2014 (yellow card)
Cambodia	0	0.00	0	0.00	1.88 (#77)	2013 - present (red listed) 2012 - 2013 (yellow card)
Cameroon	0	0.00	0	0.00	1.75 (#96)	2023 - present (red listed) 2021 - 2022 (yellow card)
Comoros	0	0.00	0	0.00	2.20 (#43)	2017- present (red listed) 2015 - 2017 (yellow card)
Liberia	0	0.00	0	0.00	2.46 (#23)	2017 - present (yellow card)
Saint Vincent & the Grenadines	0	0.00	0	0.00	2.50 (#22)	2017 - present (red listed) 2014-2017 (yellow card)
Sierra Leone	0	0.00	0	0.00	1.85 (#83)	2016 - present (yellow card)
Saint Kitts & Nevis	0	0.00	0	0.00	1.47 (#133)	2014 - present (yellow card)
Trinidad & Tobago	0	0.00	0	0.00	1.33 (#143)	2023 - present (red listed) 2016 - 2023 (yellow card)
Tunisia	0	0.00	0	0.00	2.54 (#19)	-
Vanuatu	0	0.00	0	0.00	2.88 (#14)	2012 - 2014 (yellow card)

Notes

* High-risk states are defined here as those ranked in the top 20 of the 2023 IUU Fishing RIsk Index for flag states, as well as those that have been carded by the EU since 2022.

** This data is still provisional and subject to change as of 30 July 2025.

*** The 2023 IUU Fishing Risk Index ranks China as the world's top IUU offender overall. While in 2023 it ranks second behind Russia for its responsibilities as a flag state, China has historically had a worse record, holding the #1 position in the 2019 and 2021 flag state rankings.

The following case studies illustrate how illicit catch is almost certainly passing through British ports of entry undetected and reaching the plates of unsuspecting UK consumers. As examined in **Section 4** of this report, the UK's implementation of seafood import controls, and particularly the rate and targeting of catch certificate verifications, is currently insufficient to effectively scrutinise imports to ensure compliance with applicable fisheries rules and management measures, and prevent IUU-caught fish from entering the UK market.

Illicit catch is almost certainly passing through British ports of entry undetected and reaching the plates of unsuspecting UK consumers.

Fish for sale at Billingsgate Market, London.

Case study 1: UK supermarkets stocked through suffering

A recent EJF investigation into Chinese company Zhejiang Ocean Family Co., Ltd. (ZOF) revealed that tuna caught by vessels engaged in serious alleged IUU fishing practices and human rights abuses is highly likely to be reaching UK supermarket shelves.

A leading company in global seafood supply chains, ZOF accounted for nearly 15% of all Chinese tuna production in 2020.[92] EJF's investigations found that 12 tuna fishing vessels owned or chartered by ZOF or a ZOF subsidiary were systematically engaged in different forms of IUU fishing, including cruel practices such as shark finning and intentionally killing cetaceans (see **Table 2**).[93] Testimony obtained from crew members working on board the vessels also revealed a number of serious human rights abuses including physical abuse, salary deductions, human trafficking, and forced labour. The crew recounted to EJF how life on ZOF vessels was one of widespread sickness and despair, tragically leading to the deaths of two crew members, one by suicide and one as a result of physical illness.

> **Nine of these ZOF-owned vessels appear on the 2025 list[94] of establishments approved to export to Great Britain, with all 12 approved in 2024.[95]**

Table 2: Statistics of reported IUU fishing and human and worker rights violations on 12 ZOF vessels investigated by EJF[96]

Reported abuses		% (Number of interviewees, n=20)	% (Number of interviewees, n=12)
IUU fishing	Shark finning	60% (12)	67% (8)
	Catching and killing cetaceans	50% (10)	67% (8)
Human and worker rights violations	Requirements to pay guarantee money	40% (8)	50% (6)
	Confiscation of ID documents	80% (16)	75% (9)
	Excessive overtime	80% (16)	83% (10)
	Physical abuse	35% (7)	50% (6)
	Verbal abuse	40% (8)	42% (5)
	Abusive working and living conditions (for example, a lack of medicine, food or water)	50% (10)	67% (8)

Analysis by EJF revealed suspected supply chain links between ZOF-caught tuna and UK supermarkets. In 2021 and 2024, Grupo Frinsa, a Spanish company describing itself as 'one of the largest European manufacturers of canned tuna and shellfish'[97] purchased 3,159 tonnes of pre-cooked tuna loins or frozen tuna from several Chinese food processing companies.[98] These companies were either owned by ZOF or they sourced fish from ZOF to process. The pre-cooked tuna loins were shipped to Grupo Frinsa's headquarters and factory in Ribeira, Spain – 'Frinsa del Noroeste S.A.' – to be canned. The Frinsa group owns brands including Frinsa La Conservera, Frinsa Proteína Natural, Ribeira, Seaside, and The Nice Fisherman. These brands have appeared on UK supermarket shelves, including in Iceland[99] and Marks and Spencer.[100]

Table 3: Supply chain links between ZOF-associated processing companies and Grupo Frinsa[101]

Processing companies owned by ZOF or that sourced fish from ZOF	Brands owned by Grupo Frinsa	Retailers stocking Grupo Frinsa's brands
Ningbo Fengsheng Foods Co., Ltd.	The Nice Fisherman	Iceland
Ningbo Today Food Co., Ltd.	Frinsa La Conservera	Marks and Spencer
Zhejiang Today Biotech Co., Ltd.	Frinsa Proteína Natural, Ribeira, Seaside	Available via online retailers (e.g. Naturitas.co.uk)
Zhoushan Ocean Sun Rising Aquatic Co., Ltd.	Supply of canned fish and seafood under retailers' own brands	Carrefour, Alcampo, Lidl, El Corte Inglés

Note: It should be noted that, due to the opacity of the fishing industry and the global trade in seafood, it is currently not possible to trace the origin of the products purchased by ZOF's business partners back to particular vessels that were reported to be involved in IUU fishing and/or human rights abuses. There is no suggestion that the buyers of ZOF seafood had any knowledge of the allegations of IUU fishing or human rights abuses detailed in this report. However, EJF highlights that the evidence presented through our investigations and briefings offers the clearest warning to all interested parties that illegal and unsustainable fishing is taking place alongside human rights abuses including forced, bonded and slave labour. All parties are now clearly obligated to act.

The links between ZOF-caught tuna and the broader Frinsa group provide further evidence that tuna tainted by illegal fishing and human rights abuses may be entering UK supply chains. Catch certificates and seafood consignments received from companies linked to IUU fishing, such as ZOF and Frinsa-associated groups, should be subjected to detailed scrutiny. Full implementation of a risk-based approach to verification can improve operational efficiency and focus capacity on consignments of questionable origin. Doing so will help the UK's PHAs prevent illegally caught fish from slipping through the net and onto UK consumers' plates.

Evidence of shark finning and the capture of a thresher shark on a ZOF-owned vessel.

Case study 2: Russian whitefish undercover

Russia is second only to China on the overall IUU Fishing Risk Index, and currently ranks as the highest risk country based on flag state compliance,[102] with a history of illegalities in its domestic and distant water fleet consistently undermining international efforts to secure sustainable fisheries. Russia's score has worsened in recent years, largely due to poor compliance with RFMO flag state obligations and the large size and weak regulation of its distant water fleet.[103]

Despite the Russian fleet's persistent IUU fishing practices, the UK has been a key market for Russian-caught seafood for many years. In 2021, the UK imported 15,895 tonnes of seafood from Russia, with a value of £85 million.[104] These imports consisted almost entirely of whitefish, primarily cod, haddock and Alaska pollock, with Russian direct imports making up 9% of whitefish (cod, haddock and Alaska pollock) imports to the UK in 2021.[105]

However, in response to the Russian invasion of Ukraine in 2022, the UK imposed trade sanctions to penalise and restrict Russian imports.[106] For seafood, an additional 35% tariff was applied to Russian-originating goods.[107] Following imposition of the tariff, direct imports of seafood from Russia declined dramatically, with imports of whitefish declining by 99% between 2022 and 2023.[108] The cost of importing whitefish directly from Russia increased from around £6.61/kg to £8.92/kg in late 2022, making it the most expensive whitefish-supplying country.[109]

Table 4: Volume and value of UK imports of Russian-caught seafood and controls applied to catch certificates at the UK border

Year	Number of Russian catch certificates received[110]	Volume of Russian seafood imports (tonnes*)[111]	Value of Russian seafood imports (£ million*)[112]	Number of verification requests sent to Russia[113]	Number of Russian consignments refused[114]
2012	138	22,719	70.34	No disclosure	0
2013	60	18,996	54.97	No disclosure	0
Jan 2014-Dec 2015	1183	14,682 (2014) 17,947 (2015)	45.68 (2014) 60.06 (2015)	No disclosure	0
2016	2630	14,384	50.09	2	0
2017	2129	15,214	59.46	1	0
2018	2065	18,803	82.58	1	0
2019	1865	16,530	83.18	2	0
2020	No disclosure	17,523	84.15	No disclosure	0
2021	No disclosure	15,895	85.32	0	0
2022	No disclosure	13,206	87.21	0	0
2023	No disclosure	74**	0.34**	0	0
2024	No disclosure	168**	0.392**	0	0

Notes
* Weight and value of seafood within the scope of the UK and EU IUU Regulation.
**This data is still provisional and subject to change as of 30 July 2025.

Although Russia is internationally recognised as a high-risk state for IUU fishing, controls on imports of Russian seafood appear to have been lacking in recent years. According to data provided by MMO to EJF, since Brexit, the UK authorities have not carried out a single verification of catch certificates for imports of Russian-caught fish, and no consignments have been refused at the border for IUU fishing concerns. This high-risk seafood therefore appears to have entered the UK market largely unchecked. Concerningly, there are key gaps in oversight of seafood trade from Russia, as PHAs are no longer required to report to the MMO the number of catch certificates received from Russia – or indeed from any other country. This reduced monitoring capacity since the UK's departure from the EU is a significant weak point in the UK's current approach to import controls.

While the additional tariff has been effective in reducing direct trade, Russian-caught whitefish can still reach the UK market under the less onerous tariff regime applying to indirect imports, i.e., where fish is caught by Russian-flagged vessels but processed in a third country. Industry reports and trade data indicate that, since Russia's invasion of Ukraine in 2022, trade in Russian-caught fish has been increasingly routed through third countries such as the Netherlands and China for processing before being exported to the UK to avoid tariff sanctions.[115] In 2023, the UK imported 19,898 tonnes of cod, haddock and Alaska pollock from the Netherlands – which imposes a lower tariff of around 7.5% on Russian imports – a more than 20-fold increase compared to 2021.[116] China meanwhile reported a 28.7% increase in imports of unprocessed fish from Russia in 2023, compared to the five-year average prior to the Ukraine war.[117] According to the EU Fish Processors and Traders Association, which represents members in the EU and the UK, a substantial portion of Russian-caught Alaska pollock is reprocessed in China before being dispatched to the EU, with no viable substitutes for the species among other whitefish.[118]

This tariff loophole disproportionately impacts smaller businesses in the UK, with local fish and chip shops, for example, more reliant on frozen-at-sea fillets sourced through direct trade than larger businesses, such as supermarkets, that deal in processed goods.[119] UK supermarkets continue to source significant quantities of Russian whitefish from China's processing facilities, total imports of which are estimated at around 160,000 to 170,000 tonnes each year.[120] The UK's decision not to apply equivalent tariffs to indirect imports of Russian-caught seafood has thus allowed Russian operators to circumvent sanctions on direct trade and continue profiting from the UK market.

Data obtained from catch certificates accompanying seafood of Russian origin can provide insights into the scale of indirect trade in Russian-caught seafood and the extent to which this tariff loophole is being exploited. Under the IUU Regulation, Russian-caught seafood that is processed in China should be accompanied by both a processing statement endorsed by the Chinese authorities and a catch certificate validated by Russia as the flag state. Currently, however, catch certificate data, including the total number of consignments imported per flag state, is not being compiled or monitored centrally by MMO, and the overall scale of this trade is largely unknown. This lack of oversight precludes monitoring of broader trade trends, which is critical in identifying emerging or systematic issues such as fraud or abuse of import controls/the tariff system.

Case study 3: Illegal and unregulated, the abuse hiding in UK squid imports

Squid is a commodity at particularly high risk of being IUU due to a lack of oversight of fishing activities. Many of the world's most important squid fisheries are found in the high seas – for example the Southwest Atlantic and Northwest Indian Ocean – where they are considered to be unregulated as they are not under the jurisdiction of a relevant governing body, or Regional Fisheries Management Organisation (RFMO).[121] In such fisheries, no regional quotas are set, so a limitless amount of squid can be caught. The application of conservation and management measures, such as those relating to vessel monitoring, trans-shipment and observer coverage, lie solely with distant water flag states, raising concerns about the conditions in which fishing activities are undertaken, particularly where states, such as China, have a record of weak control of their fleets. Vessels remain at sea for extended periods of time, facilitated by at-sea trans-shipments which allow vessels to avoid controls at port, with limited to no oversight from authorities or observers.

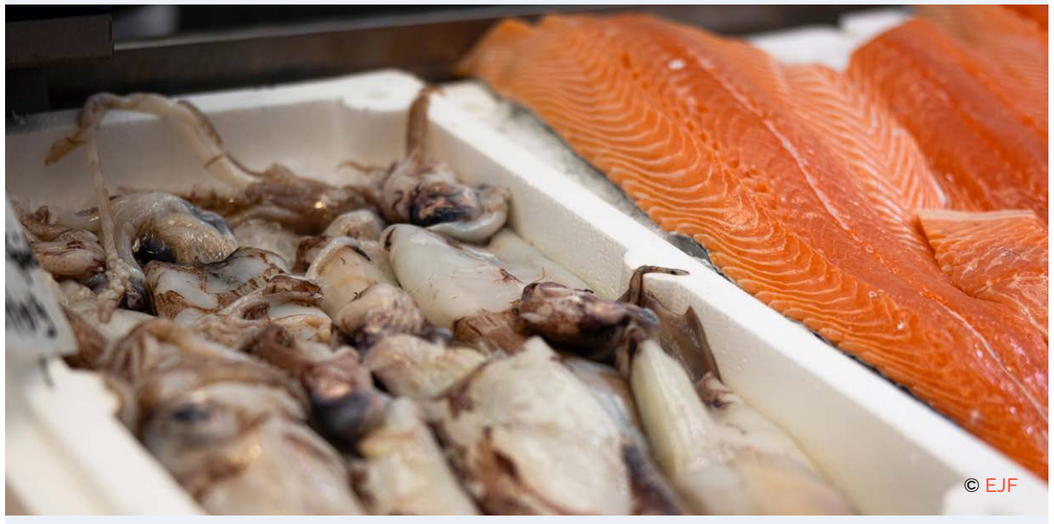
Squid jigger in the Southwest Atlantic, just outside the Argentinian EEZ.

According to one study, between 2017 and 2020, light-luring squid fishing vessels (also referred to as squid jiggers) spent 86% of their fishing time in areas that were unregulated, amounting to over four million hours of unregulated squid fishing.[122] The vast majority of this fishing effort (92%) was carried out by vessels flagged to China.[123] Chinese-flagged squid vessels have been observed going 'dark', switching off their AIS tracking systems, which can be indicative of illicit behaviour.[124] EJF's interviews with crew working on Chinese squid vessels have identified a range of potential infringements, with instances of shark finning, fishing without authorisation, and illegal trans-shipment all documented.[125]

Research has also shown that Chinese squid jiggers are associated with a high risk of forced labour, due to fishing behaviour characteristics such as distance of fishing operations from port and daily hours spent fishing.[126] This is supported by the findings of EJF and other investigations, which have identified serious labour and human rights abuses on-board the fleet. In interviews with EJF, crew working on Chinese-flagged squid jiggers detailed physical abuse, excessive working hours, circumstances consistent with debt bondage, and being forced to drink unfiltered water.[127]

Between 2021 and 2024, EJF interviewed crew members that had experienced or witnessed physical abuse and/or deaths of workers on-board five Chinese-flagged squid jigging vessels that are authorised to export their catches to the UK.[128] Crew members reported being kicked and hit by the Chinese crew, while one such vessel was linked to multiple crew deaths. In 2024, a crew member fell into the sea while installing a light on the side of the vessel during poor weather conditions.[129] A few years earlier, in July 2020, authorities in Indonesia discovered the body of a deceased worker inside the freezer of the vessel. The case resulted in the arrest of six executives from local recruitment agencies for allegedly placing Indonesian migrant fishers on the vessel, in contravention of labour laws.[130] EJF's investigations also identified instances of physical abuse on six Taiwanese and two Korean-flagged squid jigging vessels authorised to export to the UK.[131]

In 2024, the UK was the top importer of squid and cuttlefish in Northern Europe.[132] The majority of these imports come from China, which supplied 42% of UK squid imports in 2024, valued at almost £9.3 million.[133] China is the world's leading squid fishing nation, accounting for around 34% of total global squid production in 2023[134] and an estimated 50-70% of high seas catch in recent years, according to some estimates.[135] While China ranks as the worst performer globally for IUU fishing according to the IUU Fishing Risk Index,[136] the UK failed to verify a single Chinese catch certificate in 2023 or 2024[137] and has only refused four seafood consignments from China on IUU fishing grounds since 2012 (see **Section 4**).[138] As such, there is a strong likelihood of squid tainted by IUU fishing and/or human rights abuses making its way onto the UK market.



Squid for sale at a UK retailer.

OOCL Germany unloading in Felixstowe container port / Rab Lawrence / CC BY 2.0

4. Weak points in the UK's seafood import controls

The case studies highlighted so far illustrate some of the forms, and likely sources, of IUU fishing and human rights abuses in UK seafood supply chains. The following chapter examines the weak points in the UK's import controls in addressing this challenge. It finds that they are being poorly enforced and under-utilised, to the detriment of fishers, consumers, and marine ecosystems.

4.1. Catch certificates: rates of verification and refusal

Information obtained by EJF on the implementation of import controls indicates that despite high-risk trade flows into British ports of entry, the UK verifies an alarmingly low percentage of consignments, resulting in even fewer reported refusals. **Table 5** presents data on the UK's rates of catch certificate verifications and refusals from 2012 to 2024. For data up until 2019, EJF reviewed the UK's biennial reporting on the application of the IUU Regulation from its time as an EU Member State.[139] However, since leaving the EU, UK authorities have no longer been required to compile or submit these reports. In light of this, the data under review from 2020 onwards is based on information that EJF received via a data request submitted to the MMO under the Environmental Information Regulations 2004.[140]

While the MMO has not disclosed how many catch certificates the UK has received since 2020 – reportedly because this data is owned individually by the relevant PHAs and not held by the MMO – available data from 2012-2019 indicates a significant gap between the number of catch certificates received and those that have been verified, as well as very low rates of refusal since 2012.

Table 5: Catch certificate verifications and reported refusals under the IUU Regulation in annual UK seafood imports

Year	Total UK seafood imports (tonnes)*[141]	Total number of catch certificates received**[142]	Verifications under Article 17(6)**[143]	Refusals under Article 18**[144]	% of catch certificates verified***	% of catch consignments refused***
2012	615,178	10,622	No disclosure	8	No disclosure	0.08%
2013	589,148	11,073	No disclosure	8	No disclosure	0.07%
2014	561,344	24,657	40.5	8	0.16%	0.03%
2015	533,595	24,657	40.5	7	0.16%	0.03%
2016	558,990	31,696	23	7	0.07%	0.02%
2017	546,026	35,331	20	2	0.06%	0.01%
2018	517,286	34,741	15	2	0.04%	0.01%
2019	550,596	30,968	28	2	0.09%	0.01%
2020	526,113	No disclosure	No disclosure	0	No disclosure	No disclosure
2021	468,816	No disclosure	5	0	No disclosure	No disclosure
2022	473,478	No disclosure	14	1	No disclosure	No disclosure
2023	445,941	No disclosure	3	2	No disclosure	No disclosure
2024	458,424	No disclosure	5	2	No disclosure	No disclosure

Notes:

* Total weight of UK seafood imports falling within the scope of the UK and EU IUU Regulation:. Data for 2023-2024 is still provisional and subject to change as of 30 July 2025.

** There are several gaps, limitations and discrepancies within the official data sources under review, restricting EJF's view of UK Government action on imports potentially linked to IUU fishing. For the reporting period 2014-2015, data provided on catch certificates and verifications was not broken down by year. The totals for catch certificates and verifications are therefore averages across both years. In 2016-2017, the UK only reported catch certificate data for non-EU countries, whereas EU data was submitted in all other biennial reports. It is also possible that the number of refusals is higher than reported, as PHAs are permitted to refuse seafood consignments under Council Regulation 1005/2008 without consulting or informing the MMO, although this is expected to be a rare occurrence. The MMO was unable to provide data on refusals carried out by PHAs independently of the MMO, in response to EJF's data request.

*** Verification requests may correspond to multiple catch certificates, meaning the percentage of imports subject to verification could be higher than reported. The refusal ratio is based on IUU Regulation guidance, which suggests one catch certificate per consignment, though multiple certificates may be issued per consignment.

According to available data, the percentage of verified catch certificates has never exceeded 0.16% (achieved for the reporting years of 2014-2015) and dropped to as low as 0.04% in 2018. This puts the UKs performance far behind countries such as Spain (**Box 3**).

When examining the total tonnage of fish imported to the UK, it is evident that import levels have remained relatively consistent over time. However, when comparing the number of verifications to the tonnage of fish imports, there has been a sharp decline in verifications in recent years (**Figure 3**). The average annual number of verifications for the period 2016-2019 was 21.5, compared to just 6.75 for the period 2021-2024. This represents a more than threefold decline in verifications following the UK's exit from the EU.

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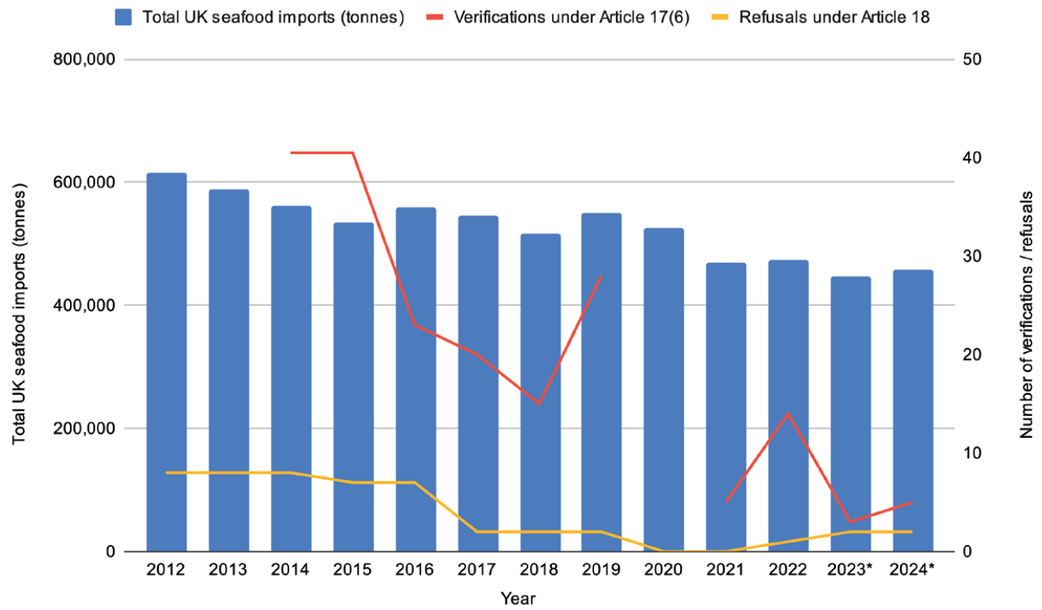


Figure 3: UK seafood import volume[145] compared to verification and refusal rates[146]

Notes
MMO were unable to provide data on the number of verifications carried out in 2012, 2013 and 2020 in response to EJF's information request. In addition, as data provided for catch certificates and verifications in the UK's Biennial Report for 2014-15 was not broken down by year, the figures in the graph represent averages across both years.

Refusal rates over time have been consistently low. The highest number of annual refusals was eight in both 2012 and 2013. The UK's lowest refusal counts occurred in 2020 and 2021, with zero refusals reported to the MMO. Recent years have seen a marginal increase in the number of refusals – with one recorded in 2022 and two in both 2023 and 2024 – however these remain extremely low compared to the scale of seafood imports to the UK. Notably, it was not possible to compare rates of refusal across the entire period 2012-2024, due to the lack of data on total catch certificates received between 2020 and 2024.

4.2. Low rates of verifications and refusals of seafood from high risk countries

Table 6 presents data on the number of catch certificates received by the UK for imports of seafood from carded countries and the numbers of verifications carried out and consignments refused. The low numbers of catch certificate verifications indicate that risk criteria are not being effectively applied to identify consignments warranting greater scrutiny due to a high risk of products originating from IUU fishing. As a result of the poor verification rate, very few consignments were refused from these high risk countries during the period 2012-2024.

A foreign-owned trawler operating in Senegalese waters.

Table 6: Catch certificates received for fisheries products from carded countries and numbers of verifications and refusals[147]

Year	Number of catch certificates from yellow carded states*	Country breakdown	Number of verification requests sent to yellow carded third countries	Verification rate	Number of yellow carded country refusals
2013	926	Belize (242) Panama (8) Sri Lanka (676)	No disclosure	No disclosure	0
2014-2015**	7319	Curacao (23) Fiji (3) Ghana (688) Panama (97) Papua New Guinea (66) Philippines (2077) Solomon Islands (12) South Korea (177) Sri Lanka (2579) Thailand (1597)	No disclosure	No disclosure	2014 - 6: 5 (Ghana) 1 (Panama) 2015 - 1 (Ghana)
2016	1788	Curacao (41) Solomon Islands (2) Taiwan (134) Thailand (1611)	1 (Taiwan)	0.06%	1 (Taiwan)
2017	2331	Taiwan (113) Thailand (2218)	0	0.00%	1 (Thailand)
2018	1467	Taiwan (159) Thailand (1217) Vietnam (91)	1 (Vietnam)	0.07%	0
2019	381	Vietnam (381)	2 (Vietnam)	0.52%	0
2020	No disclosure	No disclosure	No disclosure	No disclosure	No disclosure
2021	No disclosure	No disclosure	1 (Ecuador)	No disclosure	0
2022	No disclosure	No disclosure	1 (Panama) 1 (Vietnam)	No disclosure	0
2023	No disclosure	No disclosure	1 (Ecuador) 1 (Vietnam)	No disclosure	1 (Vietnam)
2024	No disclosure	No disclosure	1 (Ecuador) 3 (Ghana)	No disclosure	1 (Ghana)

Notes
* States are included if yellow-carded for at least nine months in a given year, or if they were yellow-carded and later red-carded within that year.
** For the reporting period 2014-2015, data provided on catch certificates and verifications was not broken down by year.

Between 2016 and 2019 – the only years for which the MMO has disclosed carded-state verification data – the percentage of catch certificates from yellow carded states that were verified never exceeded 0.52%. In 2019, the year with the highest recorded rate by this metric, the UK received 381 catch certificates from yellow carded states (all from Vietnam), of which only two were verified. No catch certificates from yellow carded states were verified in 2017.

Although data provided to EJF by the MMO for the years 2020 to 2024 is incomplete, available information suggests that the UK's verification rates have remained low during this period. Between 2021 and 2024, the UK imported 205,060 tonnes of seafood from yellow carded countries: Vietnam (60,601 tonnes), Panama (379 tonnes), Ecuador (107,090 tonnes), Ghana (36,991 tonnes).[148] During this period, only nine carded-country catch certificates were verified. In 2024, the UK recorded its highest number of catch certificate verifications in recent years, though this still only amounted to four verifications. Rates of refusals of consignments from carded countries are similarly low. For around half of the years under review, available data shows the UK did not refuse any consignments from yellow-carded states and only refused ten seafood consignments from carded countries in over a decade between 2012 and 2024.

EJF's analysis reveals how controls on imports from other high risk countries are also falling short of the level required to effectively detect and prevent products from IUU fishing from entering the UK market. While China ranks as the world's worst offender for IUU fishing according to the IUU Fishing Index[149] – an assessment supported by substantial evidence from EJF investigations[150] – the UK verified just two catch certificates from China between 2021 and 2024, and recorded only four refused consignments from China since 2012.

Between 2021 and 2024, the UK imported 205,060 tonnes of seafood from yellow carded countries. During this period, only nine carded-country catch certificates were verified.

While China ranks as the world's worst offender for IUU fishing, the UK verified just two catch certificates from China between 2021 and 2024, and recorded only four refused consignments from China since 2012.

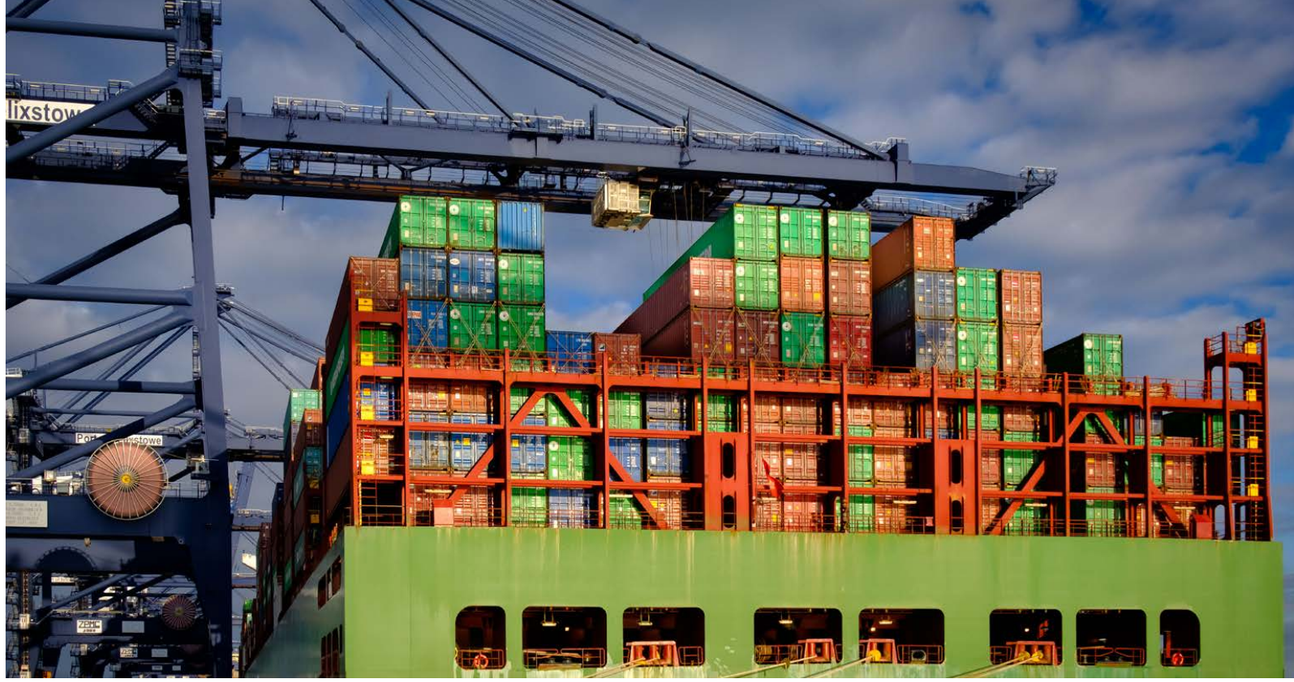
Chinese bottom trawler in the port of Dakar, Senegal.

Table 7: Chinese seafood imports to the UK and numbers of verifications and refusals

Year	Number of catch certificates received from China[151]	Volume of Chinese imports in tonnes[152]	Value of Chinese imports in £ million[153]	Number of verification requests sent to China[154]	Number of Chinese consignments refused[155]
2012	600	51,437	141.06	No disclosure	0
2013	677	60,840	159.71	No disclosure	1
Jan 2014-Dec 2015	1440	65,125 (2014) 53,337 (2015)	167.048 (2014) 146.759 (2015)	No disclosure	0
2016	1125	57,500	168.07	3	0
2017	997	58,541	180.61	0	0
2018	1168	55,277	175.87	3	1
2019	1118	65,059	248.77	1	0
2020	No disclosure	61,355	225.56	No disclosure	0
2021	No disclosure	49,963	175.87	0	0
2022	No disclosure	54,076	253.31	2	1
2023	No disclosure	58,908*	278.38*	0	1
2024	No disclosure	65,056*	267.92*	0	0

Notes:
*This data is still provisional and subject to change as of 30 July 2025.

A Chinese longline vessel operating in the Indian Ocean.



Port of Felixstowe / John Bugg / CC BY-NC-ND 2.0

4.3. The UK has lost oversight of its import controls

As an EU Member State, the UK was required to monitor, record and submit detailed biennial reports on the implementation of seafood import controls under the IUU Regulation. Despite transposing this legislation into UK law after Brexit, it has since stopped tracking seafood import controls in this way and there are now no obligations for PHAs to report such data to the MMO. In doing so, the UK has lost a critical tool in ensuring compliance with the IUU Regulation at the UK border and in turn, weakened its capacity to prevent illegal seafood from entering the UK.

Moreover, at present, PHAs are permitted to refuse seafood consignments under the IUU Regulation without contacting or notifying the MMO. This is despite PHAs' primary focus being the safety of imported goods and the typical process being that a PHA would consult the MMO for advice on action to be taken on any suspect seafood consignments. It is not expected that this is a frequent occurrence but, in theory, there are now refusals on IUU fishing grounds taking place that neither the MMO nor Defra are being made aware of. To ensure the MMO – and by extension, the UK Government – has access to timely and accurate data on seafood consignment refusals under the IUU Regulation, PHAs should be required to notify the MMO whenever such action is taken at a UK port of entry. Notably, when the UK was in the EU, PHAs were required to submit this data to the MMO for inclusion in the UK's biennial reports.

Overall, the regression in the UK's reporting requirements is preventing the MMO, Defra and external stakeholders from getting a clear reading on key data including the number of catch certificates and processing statements received from flag and processing states, and the extent to which proper checks and risk-based approaches are being implemented. The UK Government should urgently reinstate this essential reporting system, and go further by requiring PHAs to submit information to the MMO on an annual basis. PHAs should also be required to provide the same level of information required in the EU's biennial reports, just as they successfully did for many years whilst the UK was in the EU. To solidify this process, it would be prudent to restore this reporting as a legislative requirement given that Article 55 – which requires EU Member States to report in this way – was removed from the UK's version of the IUU Regulation[156] post-Brexit.

Once this reporting requirement is restored, the data it provides should be made publicly accessible to ensure transparency and accountability. Doing so would bolster legislative compliance and the transparency, efficacy, and consistency of IUU controls across the UK's ports of entry. Data from the reports would help identify higher-risk sources of seafood, allowing the UK to refine its policies and allocate resources more effectively to screen out illegal seafood. It would also aid vital information-sharing between key seafood markets to support international action against vessels, companies and states that are supporting or engaging in IUU fishing.

Case study 4: The UK ignores widespread IUU fishing and human rights abuses in Ghana's fisheries

The UK is a key market for fisheries products from Ghana, importing £43.2 million worth of seafood from the country in 2023.[157] In 2023, the UK was the most important market for tuna exports from Ghana in terms of value, and the leading destination for tuna processed in the country, accounting for 36.5% of processed tuna exports by volume and value.[158]

In recent years, EJF has uncovered widespread and systemic illegal fishing and human rights abuses in the Ghanaian-flagged industrial trawl fleet. EJF's investigations estimate that 90% of trawl vessels operating under the Ghanaian flag are owned by Chinese corporations,[159] despite Ghana's fisheries laws prohibiting foreign involvement in the trawl sector.[160] The use of complex ownership structures and local front companies have allowed Chinese companies to profit from fishing activities, while evading scrutiny and sanctions for IUU fishing.

A Ghanaian-flagged, Chinese-owned industrial trawler fishing around the boundaries of Ghana's Inshore Exclusive Zone, an area reserved exclusively for artisanal fishers.

This opacity around beneficial ownership and those who truly benefit from and control vessels in the trawl sector has provided fertile ground for abuses and illegality. Of the 36 crew members interviewed by EJF who worked on Ghanaian-flagged industrial trawl vessels between July 2021 and June 2022, 92% had witnessed the dumping of commercially undesirable fish overboard, and 81% had witnessed their vessel fish illegally in Ghana's Inshore Exclusion Zone (IEZ) reserved for canoe fishers. Abuse of workers' rights was widespread, with 81% reporting that they have witnessed or experienced physical violence and 97% reporting that they would often work in excess of 14 hours per day.[161]

The UK's appetite for tuna from Ghana may be indirectly supporting IUU fishing, with actors behind the destructive and illegal practices rife in the trawl sector also profiting off tuna sold to the UK. Although Ghana's industrial trawl fleet primarily targets demersal species like snappers and cephalopods which are not directly exported to the UK, the illegal practices of this part of the fleet are linked to UK tuna imports through the shared ownership of vessels.[162] An example is the LU RONG YUAN YU 956, an industrial trawler that was fined a record US$1 million for illegal fishing in 2019. The vessel is beneficially owned by Rongcheng Ocean Fishery Co Ltd, a Chinese company that also owns two tuna vessels, the LU RONG YUAN YU 221 and 222, that are included on the list of establishments authorised to export fishery products to the UK.

As a result of concerns about illegal fishing, Ghana has been issued a yellow card by the EU on two occasions: the first in 2013, which was lifted in 2015, and the second in 2021, which is still in place at the time of writing. Ghana's 2013 yellow card was directly related to its tuna fisheries, including concerns regarding illegal at-sea transshipments of tuna by Ghanaian-flagged vessels and unauthorised fishing of tuna in the waters of neighbouring coastal states.[163]

Despite the risk of illegally-caught tuna from Ghana entering the UK market during these periods, the number of verification requests and reported refusals remained low. Since 2021, when the EU issued a second yellow card to Ghana, the UK has only verified three catch certificates and refused one consignment from the country. The UK's lack of interrogation of such catch certificates significantly increases the likelihood of illegally-caught fish entering the UK market, undermining international efforts to create a market incentive for Ghanaian authorities to address IUU fishing in their waters and by vessels flying the Ghanaian flag. Given the importance of the UK as a market for Ghanaian seafood, actions taken by the UK could be transformative in driving positive fisheries reforms in the country.

The livelihoods of Ghana's artisanal canoe fishers are under threat from illegal industrial trawling.

London Gateway / Les Chatfield / CC BY 2.0

5. Reforming UK import controls

The evidence presented in this report demonstrates that the UK must urgently reform its seafood import control measures to prevent products linked to IUU fishing from reaching its market.

5.1. Implementation of a more substantive risk-based approach

As outlined in **Section 2** above, the UK retains the pre-Brexit version of the catch certification scheme mandated under the EU's IUU Regulation.[164] This involves paper-based catch certificates that detail where the fish was caught, by what vessel, and of which species. Upon receipt of catch certificates for the import of fisheries products into the UK, the MMO and PHAs at UK ports carry out a number of standard checks to determine whether products are linked to IUU fishing namely:

- If the vessel appears on any IUU vessel lists;
- If the vessel was authorised to fish in certain areas at particular times, including by checking the RFMO's list of registered vessels;
- If the species and weight is consistent across all documentation.[165]

While the UK receives, on average, 25,000 catch certificates for seafood imports annually,[166] there is currently no standardised approach to risk assessment implemented across all PHAs to assist in directing in-depth verifications to consignments at greater risk of stemming from IUU fishing. Available data on the UK's implementation of import controls indicates that risk management is falling short of the standard that may be expected, with relatively few verification requests sent to high risk flag states in recent years (**Table 6**).

Strengthening the UK's risk management procedures would help to target limited enforcement effort and increase the likelihood of detecting products from illegal activities. EU legislation that was retained by the UK following Brexit, provides guidance to Member States on risk criteria for verifications, which include: trade in species of high commercial value; discovery of new trade patterns/significant and sudden increases in trade volumes for a species; inconsistencies between trade patterns and the known fishing activities of a flag State; the involvement of a newly established operator; presumed deficiencies in the control system of a flag State; and a vessel having recently changed name, flag or registration number.[167] These criteria should inform the development of the UK's own risk criteria, which should consider, at the very least, the carding status of the importing country, as well as reports from authoritative sources concerning a country's current or recent history of weak fisheries controls.[168] This can be supported by the UK's own implementation of a carding system that, like the EU carding system, allows authorities to better identify high-risk consignments. Critically, it is essential that, once a risk is identified, authorities take the appropriate steps to respond to that risk, implementing the necessary actions to verify the information in the catch certificate and to refuse the import where sufficient proof of compliance is not obtained.

5.2. Expansion of key data elements and digitisation of the system

Catch certificate schemes and import controls are being adopted and further refined in major seafood market states around the world to counteract the growing threat posed by IUU fishing. To position itself at the forefront of global efforts to combat IUU-fishing through market-based measures, the UK needs to keep pace with these developments. That means not only acting to step up verifications under the UK's existing catch certificate system, but also improving the data requirements for catch certificates themselves, to ensure this key piece of import documentation provides all of the information required to assess the legality and sustainability of any given catch.

Currently, the UK implements 13 of the 17 key data elements (KDEs) recommended as the minimum for a robust import control scheme.[169] However, the UK fails to require vital information regarding the catch, including gear type, port of landing and adequate data on catch area.[170] The UK's catch certificate also uses a weaker "if issued" requirement for the inclusion of the vessel's IMO number, whereas the EU's new catch certificate will use "if applicable" which obligates a vessel to provide this information if it is legally required to have one. **Table 8** shows how the UK has fallen behind the EU and other major market states, such as South Korea, in terms of the KDEs it requires on its catch certificates.[171]

It is noted that, while the UK is falling behind other market states in terms of KDEs, the coverage of its catch certificate scheme is broader than those of the US, Japan and South Korea which apply to a limited number of species.

Seafood for sale at a UK retailer.

Table 8[172] The 17 recommended KDEs for a robust import control scheme, including the requirements of the European Union, United States, Japan, South Korea, and Australia's proposed KDE requirements.[173 174]

	Key data element	UK	EU	US	Japan	South Korea	Australia
Who	Vessel name	Required	Required	Required	Required	Required	Required
	Unique vessel identifier (IMO number)	Conditional	From 10.1.2026[175]	Conditional	Conditional	Required	Conditional
	Vessel flag	Required	Required	Required	Required	Required	Required
	International Radio Call Sign (IRCS)	Required	Required	Not Required	Conditional	Required	Conditional
	Information on exporter / re-exporter	Required	Required	Required	Required	Required	Required
	Identity of import company	Required	Required	Required	Required	Required	Required
What	Product type	Required	Required	Required	Required	Required	Required
	Species name - ASFIS 3-Alpha Code	Required	Required	Required	Conditional	Required	Required
	Estimated live weight (kg)	Required	Required	Not Required	Required	Required	Conditional
	Processed weight (kg)	Required	Required	Required	Required	Required	Required
	Transshipment: Declaration and authorisation of transshipment at sea, IMO number and vessel master information	Required	Required	Conditional	Required	Required	Conditional
When	Event date	Required	Required	Required	Required	Required	Required
Where	Catch area (defined with a clear distinction between the EEZ and the high seas)	Not Required	From 10.1.2026	Required	Required	Required	Required
	Authorisation to fish	Required	Required	Conditional	Required	Required	Conditional
	Port of landing	Not Required	From 10.1.2026	Required	Not Required	Required	Required
	Processing location	Required	Required	Required	Required	Required	Required
How	Fishing gear type or catch method	Not Required	From 10.1.2026	Required	Conditional	Required	Required

In 2024, the EU revised its IUU Regulation to make catch certificates more comprehensive and digitised, with the new rules applying from January 2026.[176] As part of this revision, additional KDEs were added to the catch certificate to cover the 17 recommended KDEs in **Table 8**, including the vessel's unique identification number, the port of landing for the catch, more detailed information about the catch area[177], and the type of fishing gear used. The addition of these elements strengthens the EU's catch certificate scheme vis-à-vis the UK's scheme, which was transposed from EU law in 2020 but which has not benefited from further reforms or updates.

A new online system, CATCH, has also been developed to streamline the EU catch certification process and enable the efficient exchange of information between EU Member States.[178] This will strengthen coordination among Member States in tackling IUU fishing and help to prevent duplication or manipulation of catch certificates. For the same reasons, the UK should seek to digitise its own catch certificate scheme while ensuring it is interoperable with platforms employed in other market state's IT systems, such as the EU's CATCH system. This will not only aid vital information sharing and enhance identification of high-risk consignments but also make the UK a less attractive destination for exporters of illegal seafood, simplify compliance for businesses that import to both markets and reduce administrative burden for implementing authorities.

It is critical that the UK keeps pace with global efforts to tackle IUU fishing and ensures its market does not become a dumping ground for illegally caught seafood increasingly blocked by more stringent regimes, such as the EU's. This will require the UK to enhance the KDEs included in its catch certificate, digitise its system, and ensure that the risk criteria applied are comprehensive and fully implemented to direct verifications towards high-risk catch certificates, which result in consignments being refused where compliance with relevant laws and management measures cannot be demonstrated.

Finally, it is important to stress that these efforts risk being undermined if the UK does not also prioritise tackling IUU fishing in its own waters. Strengthening import controls must be matched by equally ambitious reforms to domestic monitoring, regulation and enforcement. Only through leading by example – both at home and abroad – can the UK credibly position itself as a global leader and inspire others to follow suit.

Fish for sale at Billingsgate Market, London.

Box 3: Spain: a 'best practice' comparison[179]

Universal progress is needed to improve fisheries transparency to a level that can enable sustainable and ethical practices across the seafood supply chain. Certain states are more advanced in their implementation of seafood traceability measures and offer a roadmap of current-state best practices, whilst also highlighting common areas for further improvement.

Spain operates under EU fisheries law, including the EU's IUU Regulation. Compared to other EU Member States, Spain has demonstrated, in recent years, higher-than-average catch certificate verification rates and implemented more sophisticated and higher quality import checks. Spain also scores comparably highly in terms of IT operations and investigations into potentially risky catches, with early implementation of a digitised catch certificate system (**Table 9**).

Table 9: Quality of import controls implemented by Spain

Member State	Level of IT sophistication	Scope and quality of checks
Spain	HIGH	HIGH
	• dedicated web platform for importers to input data and attach scanned documents • automated checks and risk analysis using multiple risk parameters • integration of systems for customs and management/control of illegal fishing	• systematic basic check on all incoming catch certificates • systematic check on document completeness and coherence • catch certificates with errors sent for in-depth second-level checks by specialised illegal fishing investigation unit • frequent requests to importers and flag state • physical inspections possible • cooperation with customs

Source: European Court of Auditors[180]

Spain verifies a far higher proportion of catch certificates compared to the UK (**Table 10**). Between 2022 and 2023, Spain verified over 18 times as many catch certificates as the UK, despite receiving, historically, only around twice as many catch certificates.[181] Imports to Spain have, meanwhile, been associated with a lower IUU fishing risk than imports to the UK (which might be expected to translate to lower rates of verification): in 2018-19, for example, before the UK left the EU, Spain received less than 5% of import catch certificates from carded non-EU countries, compared to the UK at around 8%.[182]

Notably, in recent years, Spain has achieved a much higher number of verifications than the UK, despite employing fewer staff to work on verifications. The UK Government has reported that the MMO employs ten full-time equivalent staff to support catch certificate verifications,[183] whilst the equivalent team in Spain's authorities employed a total of eight staff members in 2022-23 and only six in 2020-21, all employed full-time[184]. By way of comparison, during the reporting period 2022-23 Spain made 314 verification requests compared to the UK's 17. During the period 2020-21 Spain made 207 verification requests compared to the UK's five.[185] This suggests that, even with current capacity, the UK authorities could significantly increase their rate of catch certificate verifications to deliver more robust seafood import controls.

It is, however, noted that although Spain has demonstrated better than average implementation of import controls, there remains scope for improvement, particularly in light of declining rates of verifications and refusals in recent years (**Table 10**).[186] This is a persistent issue across the EU, with the majority of Member States verifying catch certificates at a rate lower than stringent transparency measures require.[187] [188]

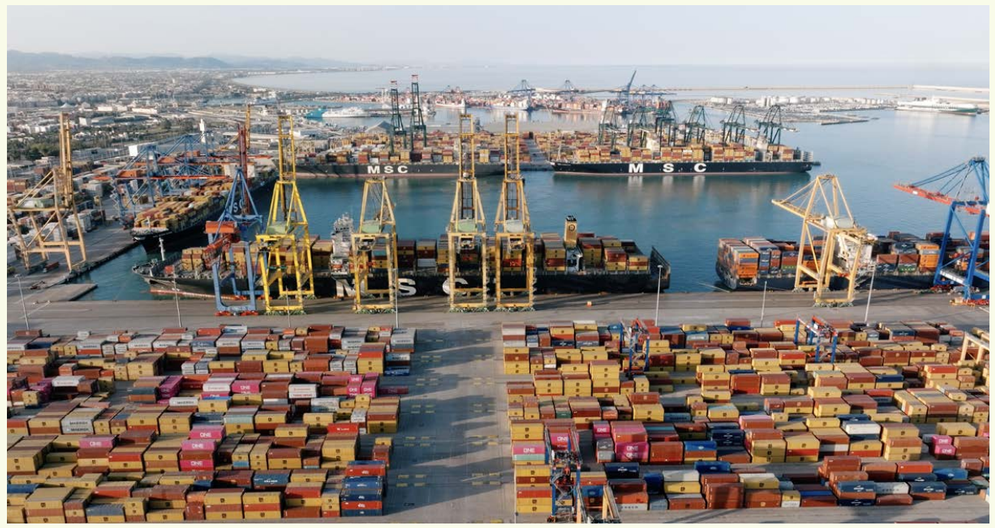
Table 10: Catch certificates and verification rates for Spain, 2012-2023[189]

Year	Number of catch certificates received	Number of verification requests sent to third countries	% of catch certificates verified**	Number of consignments refused	% of catch consignments refused**
2012-2013	94,718	1031	1.09%	44	0.05%
2014-2015	105,365	942	0.89%	58	0.06%
2016-2017*	116394	579	0.50%	24	0.02%
2018-2019	138024	432	0.31%	13	0.01%
2020-2021	110866	207	0.19%	10	0.01%
2022-2023	122950	314	0.26%	15	0.01%

Notes

* 2016-2017 reporting excludes EU catch certificates[190]

** Verification requests may correspond to multiple catch certificates, meaning the percentage of imports subject to verification could be higher than reported. The refusal ratio is based on IUU Regulation guidance, which suggests one catch certificate per consignment, though multiple certificates may be issued per consignment.



Industrial Seaport, Valencia, Spain, 2024. Credit: Mariom, Storyblocks

5.3. Using import controls to combat human rights abuses in the UK's seafood supply chain

To establish itself as a leading market state in the fight against IUU fishing, the UK should recognise the close connection between illegal fishing and labour abuses by ensuring labour-related risks are addressed as part of those controls. Integrating labour-related data elements into its catch certificate – in addition to the 17 KDEs outlined in **Section 5.1** above – would fill critical data gaps that currently limit the government's ability to detect and deter perpetrators of abuse.[191]

Currently, no state has implemented an import control system that includes labour-specific risk information that can help flag high-risk importers. However, in the US, Customs and Border Protection (CBP) is empowered to issue a Withhold Release Order (WRO) when the agency has reasonable evidence of the use of forced labour in the manufacturing or production of a good or goods entering the US supply chain.[192] A WRO allows CBP to detain the products in question at all US ports of entry until/unless importers can prove the absence of forced labour in their product's supply chain. To date, five WROs have been issued with regard to fishing vessels, including a WRO issued in 2021 for the entire fleet of fishing vessels owned by Dalian Ocean Fishing Co. Ltd, following identification of all 11 of the International Labour Organization's indicators of forced labour during a CBP investigation into the company.[193] The EU has also taken action to combat forced labour in global fisheries, with recent reforms under the Fisheries Control Regulation recognising that "conducting fishing activities with the use of forced labour is contrary to the objectives of the common fisheries policy".[194]

Table 11 details five KDEs that can assist in flagging forced labour risks associated with imported seafood products.

Table 11: Recommended KDEs to detect labour-specific risks in seafood imports[195]

Key data element	Use in the assessment of forced labour risks
Disclosure of the duration of work at sea between trips to port.	Excessive days at sea (more than three months) can serve as a warning sign for ILO forced labour indicators. Once on board a vessel, fishers are vulnerable because their movements are restricted and their possibility of escape is limited. Where fishing vessels stay at sea for long periods, abuse can take place for some time before any intervention is possible.[196]
Disclosure of number of trans-shipments occurrences per trip	Repeated transshipments of catch or transfer of crew at sea can serve as warning signs for ILO forced labour indicators. Transshipments enable vessels to remain at sea for extended periods of time and may allow them to evade oversight and inspections.
Maritime Mobile Service Identity (MMSI) number of the vessel	MMSI numbers are associated with an AIS device. AIS data can be used to cross-reference importers' disclosures of the duration of work at sea, the length of time spent at port, and whether vessels turn off their AIS systems which can indicate IUU fishing activity and potential forced labour.
Disclosure of whether all crew members have access to Wi-Fi	Lack of crew Wi-Fi connectivity enhances workers' vulnerability to forced labour risks. Wi-Fi enables crew access to grievance mechanisms on-the-water: crew can report labour-related issues in near-real time and back it up with video evidence.
Disclosure of whether the vessel or captain have faced action by competent authorities for violations of labour rights	Like IUU fishing, labour abuses are often perpetrated by the same vessels or captains. Record keeping on previous violations provides regulators with information on a vessel's and captain's history, where a poor record of historical compliance can indicate risk of abuse.

Integrating the five recommended KDEs into the UK's catch certificate would be a relatively simple step that could significantly strengthen authorities' ability to assess the risk of seafood imports being linked to forced labour. For instance, the current catch certificate already requires information on a product's trans-shipment history. Expanding this to include the number of trans-shipment events per fishing trip would be a minor adjustment but offer valuable insights – frequent trans-shipments can signal that crew are being kept at sea for excessive periods or even trafficked between vessels.[197]

The data required for all five KDEs is either readily accessible or likely already held by seafood importers, meaning the compliance burden would be minimal. However the impacts could be significant: requiring this information would likely encourage importers to conduct more robust supply chain due diligence, while creating a strong incentive to source from vessels and captains with clean records on labour abuses, rather than having to disclose links to unscrupulous operators.

Incorporating labour-specific KDEs into the UK's catch certificate would also support its broader efforts to prevent the importation of seafood from IUU fishing. Labour abuses frequently occur in tandem with IUU fishing activity[198], so the inclusion of labour-specific KDEs could also serve as an additional risk indicator for identifying consignments potentially linked to illegal fishing.

It is important to state that the KDEs listed in **Table 11** should not be viewed as a substitute for independent, worker-led investigations and vessel inspection. As workers are the supply chain actors with the greatest knowledge on and interest in protecting their labour rights, workers themselves, their representative unions and worker organisations are key stakeholders that should be meaningfully engaged in government efforts to investigate forced labour.[199] It should also be noted that integration of labour-specific information in seafood import control schemes is a relatively nascent and evolving field that the UK would be well served to monitor and engage with going forward if it is in a position to go beyond the KDEs that this report recommends.

5.4. A UK carding system

UK import controls can be supported by the use of a carding system that allows the UK to warn and sanction states that are failing to comply with their international obligations to tackle IUU fishing. Without a carding system, flag states may repeatedly validate catch certificates from IUU vessels without any consequences, undermining import controls. As shown in **Box 4**, effective use of the EU's carding system has had a positive ripple effect globally, driving constructive bilateral dialogues with third countries and helping improve their fisheries management and governance.

Tuna is processed on board a Chinese longliner operating in the Indian Ocean.

Box 4: EU carding in action

Since the inception of the EU carding system, 27 countries have received official warnings about their fisheries management, with 14 successfully reforming and having their cards removed/being delisted.[200] Studies of carded countries have found positive, long-lasting change as a result of or catalysed by the carding process.

Belize[201]

Belize was issued a yellow card by the EU in November 2012.[202] This was due to concerns that the country was not implementing international fishing rules and had high instances of IUU fishing on Belizean-flagged vessels. Belize was also operating as a 'flag of convenience', with a high proportion of vessels flying its flag being owned or operated by non-Belizean nationals. Following a failure to effectively address IUU fishing in line with its responsibilities as a flag state, Belize was issued with a red card in November 2013[203] and was included in the list of non-cooperating third countries in March 2014.[204]

By December of the following year, Belize had implemented levels of fisheries reforms deemed adequate to have the card removed. This took the form of renationalisation of the Belizean vessel registry to tackle the use of flags of convenience, alongside legislative changes that regulated the activities of its distant-water fleet. Belizean-flagged vessels on RFMO IUU lists dropped from eight in November 2013 to zero in December 2014. The carding process catalysed this change, creating tangible incentives for rapid improvements to tackle IUU fishing.

Guinea[205]

In 2012, fish landed illegally in Guinea was equivalent to around 64% of legal reported catches.[206] This rampant IUU fishing in Guinea's waters led to it being yellow-carded by the EU in November of that year.[207] In November 2013, following a lack of reform, a red card was issued.[208]

Following the red card, Guinea reformed its national fisheries legislation, improved its participation in international fishing agreements, and strengthened its monitoring, control, and surveillance measures. These measures included the development of a National Plan of Action on IUU fishing, adoption of an improved sanctioning regime, installation of two coastal radar stations and increased at-sea patrols in Guinea's EEZ. This has helped to deter IUU fishing in its waters, and led to Guinea being successfully delisted in October 2016.[209]

Solomon Islands[210]

The Solomon Islands are home to economically significant tuna fisheries. In December 2014,[211] the EU issued a yellow card to the country, for reasons including a lack of sufficient data recording and traceability, and an inadequate legal framework to support the fight against IUU fishing.

In response, the Solomon Islands passed a new Fisheries Act in 2015, significantly strengthening its legal framework for fisheries management, and particularly for tuna, its primary export. Reforms introduced conservation and management measures at sub-regional levels, refined licensing systems and total allowable effort limits. Reforms also improved traceability, with enhanced data recording requirements for processors and catch certification systems through a Fisheries Management Information System. The Act also introduced new protections for vulnerable coastal species, such as the humphead wrasse and bumphead parrotfish, via the introduction of minimum size limits and penalties for breaches.

In 2016, the Solomon Islands invested in the human capacity to deliver on these reforms by more than doubling the number of fisheries officers it employed. By February 2017, the country was judged to have made sufficient progress to have its yellow card removed. The EU's decision to issue a yellow card to the Solomon Islands is widely regarded as a key factor behind these changes.

South Korea[212]

Loopholes in South Korea's fisheries management controls and failure to comply with international obligations to address and prevent IUU fishing resulted in the country receiving a yellow card in November 2013.[213]

In less than two years, South Korea had implemented fisheries reforms to a level that allowed the yellow card to be lifted. Some notable measures included the installation of VMS on all South Korean-flagged distant water fishing vessels; increased participation in international initiatives and organisations working to tackle IUU fishing; an updated version of its National Plan of Action on IUU Fishing; and improvements to its catch certification scheme.

These case studies demonstrate the power of the carding system to catalyse positive change in third countries through a model of cooperation and improvement. This has acted as a tangible deterrence of IUU fishing and has promoted global efforts to reform fisheries transparency and sustainability.

As has been demonstrated in this report, the UK is importing significant quantities of seafood from countries that are high-risk for illegal fishing. Implementing a carding system could foster constructive bilateral dialogue with these countries, enabling the UK to leverage its market power to encourage governments to enact positive reforms in fisheries governance – helping to protect marine ecosystems from IUU fishing and improve working conditions for fishers. While carding may be especially effective in countries that rely heavily on the UK seafood market, the EU has shown that it can still drive meaningful reform even where economic impacts are limited[214] – particularly due to the reputational consequences it carries.[215]

A UK carding system would not only complement the EU's efforts, but also those of the US, where the National Oceanic and Atmospheric Administration (NOAA) releases a biennial report identifying nations whose vessels: 1) engage in IUU fishing, 2) conduct fishing practices that result in the bycatch of protected marine life, and/or 3) catch sharks incidentally or intentionally.[216] NOAA works with listed nations to address these issues by outlining the necessary measures to reform fisheries practices in the following two years. Subsequent reports outline whether a nation has made positive or negative progress on identified issues, with persistent negative progress potentially resulting in vessels being denied US port access and restrictions on imports of fish products.[217]

In September 2024, NOAA announced the denial of US port privileges to certain fishing vessels from 17 nations following their negative certification under the High Seas Driftnet Fishing Moratorium Protection Act. This included Chinese-flagged longline vessels authorised under several RFMOs in light of violations of shark-related and transshipment-related conservation and management measures, and longline vessels operating in the Convention area of the International Commission for the Conservation of Atlantic Tunas (ICCAT) beyond national jurisdiction and flagged to, among others, several EU Member States as well as Senegal, Tunisia and Turkey, due to a failure to implement by-catch mitigation measures for sea turtles comparable in effectiveness to US regulations.[218]

Use of a carding system would also strengthen the UK's import controls. It would enhance risk-based targeting, supporting UK authorities to prioritise inspections and verification efforts on seafood imports from yellow-carded states. It would encourage exporting countries to improve their vessels' compliance with the UK's requirements for catch documentation, support flag states to have the necessary traceability and IUU control measures in place to ensure the legality of seafood destined for the UK market, and send a clear signal that there are tangible consequences for failing to do so.

A functioning UK carding system would see the UK warn states by issuing yellow cards and, in extreme cases, issuing red cards, blocking UK market access. In doing so, this would provide the means through which the UK could update its official list of non-compliant countries beyond those with respect to which it retained restrictions (Comoros, Cambodia and St Vincent and the Grenadines) when it left the EU in 2020. The legal basis for implementing a carding system is already provided under Article 31 of the UK's IUU Regulation, while Article 38 provides for the UK to impose trade restrictions on non-cooperating states. When considering whether to identify a third country as non-cooperating, UK fisheries administrations are required to take into account whether a country effectively cooperates with the UK when issues of IUU fishing and associated activities are raised with them (Article 31(5)).[219] Five years on from Brexit, it is essential that the UK operationalises these central provisions of its IUU Regulation, which are critical to tackling IUU fishing around the world.

> Use of a carding system would strengthen the UK's import controls. It would enhance risk-based targeting, supporting UK authorities to prioritise inspections and verification efforts on seafood imports from yellow-carded states.

6. Conclusions and recommendations

Action is urgently needed to ensure IUU fishing is eliminated from the UK's international seafood supply chains. With over 80% of fish eaten in the UK being imported[220] – much of which is from states with proven track records of IUU fishing and human rights abuses in their seafood capture industries – it is imperative that the UK implements robust import controls in order to protect its consumers from buying illegally-caught seafood that drives environmental harm and human rights abuses across the globe. Despite this, seafood consignments are not being adequately scrutinised at British ports of entry. The case studies outlined in this report suggest that the UK's current import controls are likely enabling the trade of IUU-caught seafood and are therefore propping up IUU fishing operations and human rights abuses associated with them.

To address this challenge, the UK must expand the key data elements required in its catch certificates, digitise its catch certificate system and implement a comprehensive, risk-based approach to verification of documents. Implementing a more proactive risk-based approach to the UK's catch certification scheme should see authorities achieve a far higher number of catch certificate verifications, increasing the likelihood of detecting products from illegal activities and likely resulting in a significantly higher refusal rate of seafood consignments. Doing so will protect UK consumers and reduce the viability of the UK market for seafood from the worst offending states for IUU fishing, such as China, Russia and those that have been carded.

The UK must also ensure effective oversight of its control measures by urgently restoring the monitoring and reporting capacity for its IUU controls, which has diminished since Brexit, and go further by publishing this data annually. This should be complemented by the use of a carding system that identifies high-risk states for IUU fishing and sanctions those identified as non-cooperating – for which the legal basis already exists in the UK's IUU legislation – and harnesses UK market access as a clear incentive to make positive reforms. Without a carding system, flag states may repeatedly validate catch certificates from IUU vessels without any consequences, undermining import controls. Further, enhanced implementation and monitoring of the UK's catch certificate scheme should help support a future carding system by providing data that can be used to inform the UK's decisions on whether countries are meeting their international duties to fight illegal fishing.

As a major maritime and seafaring nation, the UK has long-been a key player in the global fisheries landscape. By implementing this report's recommendations, the UK will enhance the effectiveness and transparency of its seafood import controls, support law-abiding fishers both at home and abroad, prevent the UK market from becoming a dumping ground for illegal fish, and allow it to play a proactive role in securing positive fisheries reforms across the world. Doing so will help safeguard precious marine ecosystems and the communities that depend on them for generations to come.

Recommendations

To combat the global trade in illegal seafood, strengthen fisheries governance, and help end human rights abuses at sea, **the Coalition for Fisheries Transparency (CFT) recommends that all governments, including the UK, fully implement the provisions of the Global Charter for Transparency** and advance each of its principles in a time-bound, proven manner.

Based on the findings of this report, the CFT further recommends the following to the UK Government:

To improve import control measures

- Significantly increase the number of verifications of catch certificates and, where necessary, refusals of seafood consignments.
- Implement a digitised system to receive and log catch certificates.
- Integrate a set of 17 key data elements recommended globally as best practice (listed in Table 8) into the documentation required to import seafood into the UK.
- Fully utilise a risk-based approach to the verification of catch certificates, which should include requesting original data, such as vessel positions and relevant fishing authorisations, from the flag state authority that validated the catch certificate to demonstrate legality.
- Ensure physical inspections of freight consignments are targeted effectively as part of a comprehensive import verification process, based on the application of risk criteria.
- Require Port Health Authorities to report annually on the number of catch certificates received, verified, and refused, following the reporting format previously followed by the UK under the EU IUU Regulation, and ensure these reports are made public.
- Ensure Port Health Authorities immediately notify the Marine Management Organisation when a seafood consignment is refused under the UK's IUU Regulation.
- Strengthen capacity to detect and deter human rights abuses by requiring importers to report labour-related data elements (Table 11).

To combat IUU fishing and drive positive reforms globally

- Operationalise a carding system that allows for the issuance of 'yellow cards' as a warning and, in extreme cases, 'red cards' to block market access for states failing to take action to combat IUU fishing in line with their obligations under international law.
- Within the framework of a carding system, maintain active dialogue with countries at risk of, or having been issued, yellow or red cards for failing to effectively combat IUU fishing, with a view to supporting timely and robust reforms in their systems of fisheries governance.
- Enhance information and intelligence-sharing with partner states, particularly major market states with comparable import control schemes.

To support the implementation of these recommendations

- Ensure Port Health Authorities, the Marine Management Organisation and the Department for Environment, Food and Rural Affairs are adequately funded to enhance their capacity.
- To ensure consistency with – and avoid undermining – its international ambitions, the UK must prioritise eradicating illegal, unreported and unregulated (IUU) fishing in its own waters.

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175 The EU's current catch certificate, along with the current UK requirements, only require the IMO number to be included "if issued" by the flag State. Under this approach, even if a vessel meets the eligibility criteria for an IMO number (e.g. under RFMO requirements), if one has not actually been assigned, the field may be omitted — allowing operators to sidestep the requirement. In contrast, the updated EU catch certificate — in effect from 10 January 2026 — uses wording that requires the IMO number to be reported if the vessel is *obliged* to have one: "IMO number or, if not applicable, other unique vessel identifier (if applicable)". This includes IMO numbers for vessels required to have an IMO number under the International Convention for the Safety of Life at Sea (SOLAS), RFMO requirements, or national legislation. Where no IMO number is required or assigned, the EU instead mandates a UVI or, failing that, the national registration number. This strengthens traceability requirements and limits the flexibility to avoid vessel identification obligations. For more information on the EU's updated catch certificate, see: European Commission (2025). *Frequently asked questions: What is new in the EU catch certification scheme after amendment of the EU IUU Regulation*. https://webgate.ec.europa.eu/circabc-ewpp/d/d/workspace/SpacesStore/ab2ae1c8-b7a6-4811-9c98-8479fb110d92/download

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Making fishing vessel positional data publicly available by default, as outlined in Principle 5 of the Global Charter for Fisheries Transparency, would significantly enhance transparency of fishing activities and the effective implementation of import controls. With access to vessel tracking data, authorities could verify a vessel's movements with relative precision using the date of fishing activity and unique vessel identifier provided in the catch certificate. Opportunities exist to automatically link vessel tracking databases, such as Global Fishing Watch, to catch documentation in future, further streamlining the process and improving efficacy of controls. Achieving this should be an ultimate end goal. In parallel, the UK should work with other major seafood market states to drive international publication of tracking data and support the use of shared databases that map fishing activity by location.

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