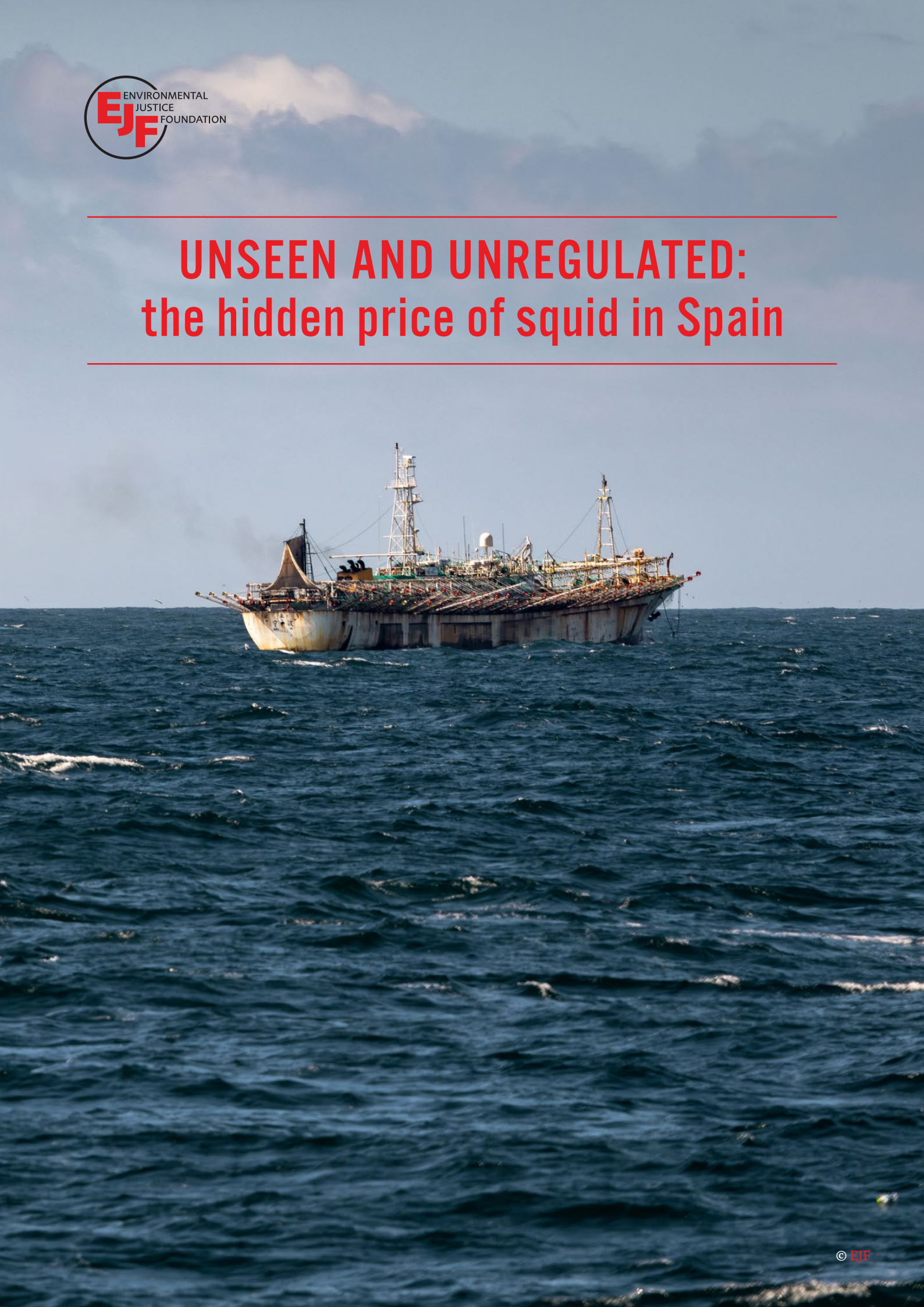
ENVIRONMENTAL JUSTICE FOUNDATION

UNSEEN AND UNREGULATED: the hidden price of squid in Spain



Executive Summary

An EJF investigation has revealed serious environmental and human rights concerns in the unregulated squid fishery on the high seas near Argentina's Exclusive Economic Zone (EEZ). In this area—commonly known as Mile 201—hundreds of distant-water vessels operate without adequate oversight. This lack of regulation leaves the door open to overfishing and unsustainable practices, threatening squid populations and the broader marine ecosystem. Several of the vessels operating in the area—mainly Chinese-flagged vessels— have been linked to illegal fishing practices, environmental destruction, and serious human rights abuses, including physical violence and deaths of migrant crew members.

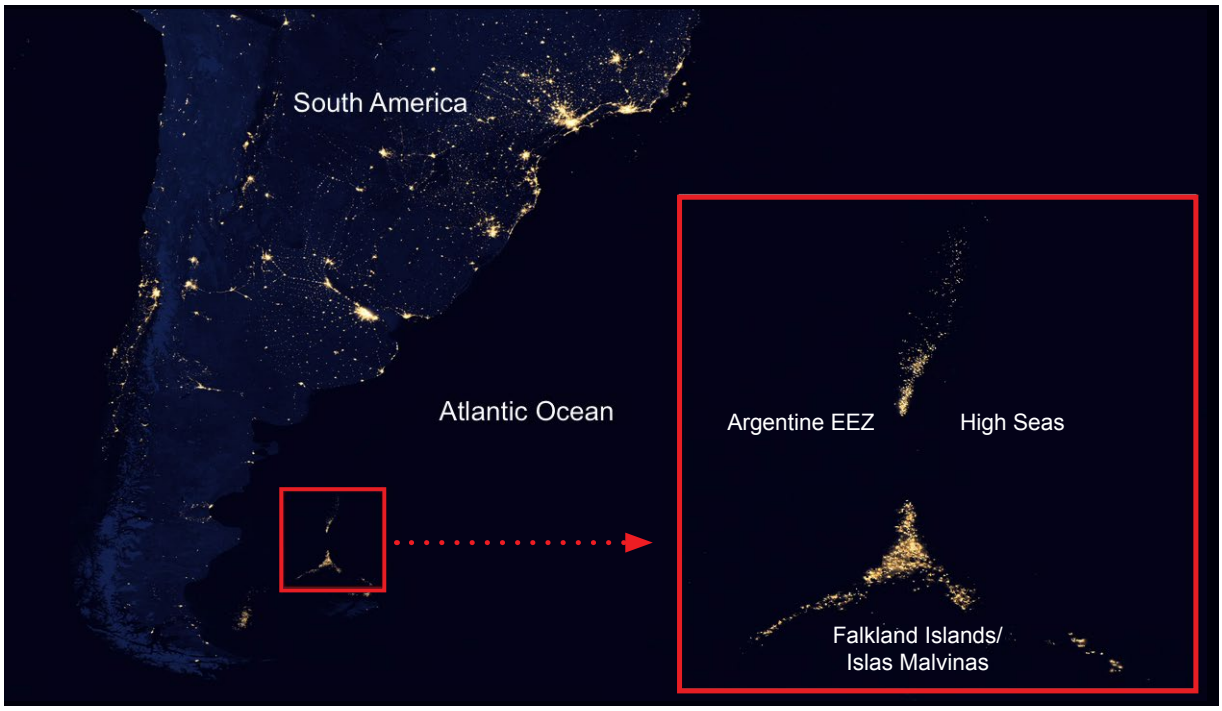
Spain, as the world's second-largest importer of squid and the EU's main gateway for squid, plays a major role in sustaining demand for this fishery. Spain is a key market for squid harvested by foreign fleets at Mile 201, inadvertently driving unsustainable and illegal practices and undercutting domestic producers who must comply with stricter environmental and labour standards. To protect Spain's seafood market, ensure a level playing field, and prevent complicity in destructive and abusive practices in the Southwest Atlantic, it is vital to adapt Spanish import control mechanisms to:

- **Improve transparency and accountability** of squid fishing activities, including through endorsement and implementation of the Global Charter for Fisheries Transparency.
- **Urgently review, strengthen, and adapt current import controls for squid**, with a focus on species like Argentine shortfin squid linked to unregulated fisheries.
- **Work with the European Commission** to improve oversight of squid imports across all EU Member States and prevent "control shopping."
- **Improve cooperation between Spanish authorities and Spanish-flagged vessels** operating in the Southwest Atlantic to better detect illegal, unreported, and unregulated (IUU) fishing.
- **Encourage collaboration among major squid fishing nations** to improve governance and promote sustainable fishing in the Southwest Atlantic.

1. The Southwest Atlantic:[1] inside one of the world's largest unregulated squid fisheries

In February and March 2025, EJF investigators participated in an at-sea expedition with the Argentine Coast Guard to the so-called 'Mile 201', an area of the high seas just beyond Argentina's 200 nautical mile EEZ, to document the behaviour of distant-water fleets targeting squid. Investigators also interviewed scientists from the Argentine government specialising in squid fisheries management, as well as members of the Argentine Coast Guard responsible for monitoring and enforcement. Semi-structured interviews were also conducted with Indonesian and Filipino crew members who had worked aboard distant water squid jiggers operating in the area.[2] In addition, discussions with industry representatives from Spain were held. These interviews provided detailed insights into illegal fishing, human rights abuses, and working and living conditions on board. Findings include:

Satellite image of squid jiggers operating at Mile 201 in the Southwest Atlantic – a 'city of floating lights'[3]



Source: NASA Earth Observatory/NOAA National Geophysical Data Center[4]

1.1 A blind spot in global fisheries management

In Argentina's **EEZ**, Argentine shortfin squid is actively managed and represents a key fishery for the country. However, just outside this area, from 'Mile 201', the situation changes drastically. There, **around 350 squid jigging vessels**, mostly from China, South Korea, and Taiwan, operate **without regional or international regulation**. Fishing pressure is also following an increasing and worrying trend: high seas fishing hours increased by 65% between 2019 and 2024, an increase almost entirely attributable to the Chinese squid jigging fleet, which saw an 85% increase in effort over the period.[5] The size of the fleet is so large that it can be seen from space at night.

> ***"The activity of the large foreign fleet in the region surrounding the EEZ maintained the same pattern as in recent years. We reiterate that this situation represents a significant threat to the sustainability of the resource."***

INIDEP (2022)[6]

Unlike many other high seas fisheries, such as tuna fisheries across the world and squid fisheries in the Pacific, the South Atlantic lacks the oversight of a **Regional Fisheries Management Organisation (RFMO)** or any cooperative governance mechanism - leaving management to individual flag states with inadequate or poorly enforced control systems - making it one of the largest unregulated squid fisheries in the world.

A squid jigging vessel operating in the high seas of the Southwest Atlantic (Mile 201)

1.2 Ecological tipping points in the Southwest Atlantic

The lack of oversight and proper management is problematic due to the potential risk of overexploitation of the resource. Argentine shortfin squid is a **short-lived and highly sensitive species**, with populations fluctuating based on environmental conditions (e.g., ocean temperatures and chlorophyll levels).[7] Scientists interviewed by EJF warn that **overfishing during naturally low years** could lead to a **total stock collapse**.[8]

"The last 10 years have been years with enormous fishing pressure. In some years the abundance of the resource has gone very low, but squid has surged again. Environmental conditions are probably saving squid. However, a situation could happen where the biological escapement is low and coincides with poor environmental conditions. This could lead to the collapse of the fishery."

Dr. Marcela Ivanovic (Head of the Cephalopods Fisheries Programme at INIDEP)

The species is a **keystone predator and prey**, essential to marine ecosystems. It supports vulnerable **dolphins, whales, seabirds**, and **commercial fish species** like hake, tuna and swordfish.[9] A collapse would trigger **cascading ecosystem disruptions** across the Southwest Atlantic, with social and economic implications for coastal communities and fisheries, including consequences for key squid markets such as Spain.

"A dramatic decrease of squid populations would cause an imbalance in the whole food chain. This would affect species of commercial interest but also species not important commercially but key in the ecosystem, such as many marine mammals and seabirds."

Dr. Marcela Ivanovic (Head of Cephalopods Fisheries Programme at INIDEP)

1.3 Illegal, Unreported and Unregulated (IUU) fishing and human rights abuses on distant-water squid vessels

"11 seals in 5 months...they just take their head and throw the body."

Crew member working on board a Taiwanese squid jigger, interviewed by EJF in June 2023

Testimonies collected by EJF from crew members working aboard squid vessels at Mile 201 revealed that, beyond environmental impacts, the lack of regulation in the area enables harm to oceanic wildlife, illegal fishing practices and associated severe labour exploitation (Box 1 and 2):

1. **Cruel/ inhumane practices, including the deliberate hunting of marine megafauna**, such as seals for their teeth. Seals were harpooned, dragged up to the deck while still alive and bludgeoned to death. Reports also indicate the occasional capture of penguins.

A South American fur seal captured by a Chinese-flagged squid jigger with injuries consistent with being harpooned. One crew member described how the vessel took hundreds of seals, intentionally hunting them as they passed the vessel.

"[It happened] often. If the seals got close to the vessel, the vessel would harpoon them. After the seals were brought on board, the teeth were pulled. The vice (captain) took the teeth and genitalia. Sometimes he also took the body and skin – but the (bodies) were often discarded."

Crew member working on board a Chinese squid jigger, interviewed by EJF in September 2021

2. **Illegal fishing practices, including shark finning and efforts to obscure vessel identities** by repainting or covering up vessel names and registration numbers, which may further indicate that fishing activities took place in a prohibited area without authorisation.

Image of shark fins and liver captured by a crew member on board a Chinese squid jigger

"The sharks were caught. We (Indonesian crew) did not process the sharks nor were we allowed to document the process – the Chinese were the ones who processed the sharks. Some of the fins were sun dried first, some were processed right away – they shredded the fins but I am not sure. The bodies were... mostly discarded. Sometimes the Chinese crew members who liked the shark body would dry it – one shark body was big enough."

Crew member working on a Chinese squid jigger, interviewed by EJF in September 2021

"We only cut the fins and threw the bodies away."

Crew member working on a Chinese squid jigger, interviewed by EJF in October 2022

3. **Systematic abuse of migrant crew members aboard these vessels**, including physical violence, avoidable or unexplained deaths, debt bondage, withheld wages, excessive working hours, and degrading living conditions.

Box 1:

A 20-year-old Indonesian fisher was deployed for over a year aboard the *Fu Yuan Yu 7605*, a Chinese distant-water fishing vessel owned by Fujian Pingtan County Ocean. His testimony reveals a harrowing pattern of financial coercion, unsafe working conditions, and gross neglect of medical emergencies.

The most severe example of neglect involved his Indonesian crewmate, who developed symptoms of appendicitis. Despite repeatedly requesting medical repatriation, the captain refused, offering only minimal medication. A week later, another crew member — a Filipino national — died on board under unexplained circumstances. These events underscore a systemic failure to provide medical care, ensure crew safety, or take preventative measures in life-threatening situations.

Throughout his time on board, the fisher endured degrading living conditions and reported that the food and drinking water supplied were often expired and unsafe. Supervisors also frequently shouted at the crew, though the fisher clarified that the verbal abuse did not escalate to profanities.

He also suffered systematic wage withholding and debt bondage: shortly after embarking, the fisher's salary was subjected to routine and unexplained deductions. For the first six months, USD 100 was withheld from his wages each month for reasons never made clear. He was also charged for document processing and compelled to pay a USD 1,000 "guarantee money" — a mechanism commonly used to enforce debt bondage. Despite working for over 12 months, he received only a single salary payment. The remaining wages were withheld, with all salary matters managed exclusively by the manning agency. These financial practices placed the fisher in a state of dependence and vulnerability, with no recourse to recover his unpaid earnings.

Box 2:

Two Indonesian fishers, both aged 24 at the time of embarkation, were subjected to severe exploitation, human rights abuses, and illegal fishing practices aboard multiple vessels operated by Qingdao Haoyang Ocean Fisheries. Their experiences aboard *Lu Qing Yuan Yu 277*, *Lu Qing Yuan Yu 286*, and *Lu Qing Yuan Yu 287* highlighted a pervasive pattern of forced labour, arbitrary wage deductions, and attempts to conceal illegal fishing activities, along with multiple deaths and neglect at sea.

Both fishers were subject to financial coercion and wage withholding throughout their contracts. Despite signed agreements promising regular wages, they faced systematic salary reductions without explanation. Fisher 1 experienced wage withholding for the first six months, with salary deductions for unspecified costs, including a "guarantee money" never received. His wages were also mismanaged through a manning agency, leaving him in a cycle of debt bondage. Fisher 2 was also subjected to similar deductions and was never paid his agreed-upon wages or guaranteed compensation, including USD 50 per month for onboard work.

IUU Fishing Practices and Environmental Crimes

During their time on board, both fishers witnessed and were indirectly involved in numerous IUU fishing activities. These included efforts by the vessel's crew to conceal the vessels' identities, potentially when operating in foreign EEZs. The crew was instructed to hide the vessel's name or identification at night and only move into permitted areas during daylight hours.

The fishers observed the frequent capture of protected species, including sharks, seals, and penguins. Shark fins were removed, and the bodies were discarded overboard. Seals were mutilated, with their teeth removed, and although penguins were released, their capture violated international conservation agreements.

Human Rights Abuses and Forced Labour

Both fishers endured physical and psychological abuse throughout their time on board. They faced verbal harassment, threats of repatriation without pay, and extreme coercion, including threats of further wage deductions for mistakes. The working conditions were harsh, with prolonged hours and constant surveillance. Fisher 2 described how supervisors and captains frequently shouted at crew members and even subjected them to corporal punishment.

The fishers were also forced to work under unsafe and unsanitary conditions, with expired food being the main provisions. They were provided with instant noodles and biscuits that were past their expiration dates, and medical care was either unavailable or severely lacking.

Death and Disposal of Crew Member

One of the most tragic and harrowing experiences shared by both fishers was the death of a fellow crew member during their deployment. Fisher 1 witnessed a Filipino crew member's death aboard *Lu Qing Yuan Yu 277* under unclear circumstances. The body was immediately thrown overboard, and no investigation or autopsy was conducted. Fisher 2 also reported the death of a crew member, whose body was disposed of in the sea after dying under similarly unclear circumstances. This lack of accountability and transparency regarding the deaths further highlighted the disregard for crew members' lives and well-being.

Forced Vessel Transfer and Escape

Fisher 1's ordeal was compounded by a forced vessel transfer. Initially contracted to work on *Lu Qing Yuan Yu 286*, he was transferred without prior notice or consent to *Lu Qing Yuan Yu 277*. The transfer added to his distress, and his psychological state deteriorated as he faced prolonged exploitation and abuse. In the end, he was so desperate to escape the abusive conditions that he jumped overboard while the vessel was anchored at sea, ultimately making his way home.

2. Implications for Spain:

2.1 Spain as a key market for squid

Squid is a staple in Spanish cuisine and a culturally significant product. This strong domestic demand is met primarily through imports: Spain is the second most important importer of squid (and cuttlefish) globally, accounting for around 15% of global imports during the period from 2019 and 2023, worth €1.5 billion each year,[10] second only to China with 21% of the total.[11] In addition, over the same period, Spain was responsible for 65% of all squid imports into the EU, making it the primary gateway for squid into the bloc.[12] Between 2019 and 2023, Spain's squid supply averaged roughly **179,348 tonnes of squid per year.** Of this total, **85% was imported (**152,602 tonnes[13]) and the **remaining 15%** (26,746 tonnes[14]) **was nationally produced** (i.e., captured by Spanish-flagged vessels).

Argentine shortfin squid is one of the most heavily traded species of squid. During the period 2019-2023, the species accounted for 13.3% of Spain's total squid imports, equating to around 20,000 tonnes annually, worth **€86 million each year**.[15] These imports came mainly from **China** (41%), **Argentina** (39%), **Taiwan** (12%) and the **Falkland Islands (Malvinas)** (7%).[16]

EJF's findings show that 42.9% of this squid originates from unregulated high seas fishery targeting Argentine shortfin squid,[17] particularly those involving Chinese-flagged vessels. During this period, an estimated 17% of China's total catch of Argentine shortfin squid was exported to the EU, **with Spain alone being the destination of 10% of this catch**.[18]

The absence of regulation enables these distant-water fleets to fish without limits, increasing the risk of overfishing and posing a serious threat to the long-term sustainability of squid populations. In addition, many of the **vessels implicated in IUU fishing and associated human rights abuses are authorised to export squid to the EU**. Without robust safeguards at the border control posts, some of this squid enters the Spanish market, putting consumers at risk of inadvertently supporting harmful practices.

For instance, we spotlighted five Chinese squid jigging companies fishing in the Southwest Atlantic Ocean that were implicated in alleged human rights abuses such as physical violence and deaths onboard. These companies were also involved in severe cases of harm to marine wildlife and IUU fishing, including shark finning and the killing of marine mammals such as seals. Between 2019 and 2024, at least 47 Spanish importers or buyers purchased squid products from processors based in China, which were owned or contracted by these five Chinese fishing companies. These five companies alone exported around 10,825 tonnes of Argentine shortfin squid to Spain during this period, equating to around 9% of Spain's annual shortfin squid imports.[19] The Chinese ports regularly used for these trades include Qingdao (63%) in northern China, which is adjacent to Rongcheng city – the important seafood processing hub and home port for many squid jiggers. On the importer side, about 45% of these Chinese imports were discharged in the port of Valencia, followed by Vigo (27%), Bilbao (10%), Algeciras (9%), and Barcelona (2%) – essentially covering the coastlines of all geographical regions of Spain.[20]

2.2 An uneven playing field for Spanish operators

In addition to imports, 15% of national demand is met through **national production,** including by squid caught in Spanish waters by Spanish vessels, often by small-scale fishers, and by Spanish vessels operating in distant-water fishing areas.[21]

Between 2019 and 2023 **Spain reported annual average squid catches of 26,746 tonnes**[22] from 6 different FAO Fishing Major Areas.[23] Out of these catches, 18,653 tonnes (**70% of the total**) were caught in the **high seas of the Southwest Atlantic**. Another 1% came from the **high seas** of the Northwest Atlantic and the Southeast Atlantic. The remaining 29% came from FAO Major Fishing areas that lie partly on the Spanish EEZ: Northeast Atlantic (23%), the Mediterranean and Black Sea (5%) and Eastern Central Atlantic (>1%), most likely attributable to fishing within the Spanish EEZ:[24]

Table 1: Overview of squid catches reported by Spain by provenance

FAO Major Fishing Area	Partly lying on the Spanish EEZ	Annual average catches of Squid (tonnes in live weight - 2019 to 2023)	% of squid capture by ES-flagged vessels
Atlantic, Southwest	No	18,652.85	70%
Atlantic, Northwest	No	121	>1%
Atlantic, Southeast	No	130	>1%
Atlantic, Northeast	Yes	6,276	23%
Mediterranean and Black Sea	Yes	1,234.75	5%
Atlantic, Eastern Central	Yes	332	1%
Total	-	26,746.21	100%

Unlike the squid jigging fleets operating at the Mile 201, this fishing is subject to EU and national frameworks and hence stricter labour and environmental standards. In the Southwest Atlantic, where around 30 Spanish trawlers target hake and shrimp, occasionally catching shortfin squid as part of a mixed catch, management measures include deployment of onboard observers, the identification of nine zones closed to bottom trawling based on scientific seabed mapping,[25] and the requirement to submit fisheries plans to national authorities.[26]

Strengthening import controls on Argentine shortfin squid and risk-based verification procedures would help ensure that Spain's seafood market supports legal, sustainable and responsibly sourced products, while maintaining fair conditions for national operators.

Trawl vessels operating in the high seas of the Southwest Atlantic

3. Conclusion and recommendations

Spain's seafood supply chains are currently exposed to **serious environmental and social risks**. While squid remains a beloved part of the Spanish diet, much of it originates from **unregulated fisheries** linked to potentially **unsustainable fishing pressure, ecosystem degradation and human rights violations**. Meanwhile, Spain's local and distant water fishing fleets, bound by higher standards, are at risk of being undercut by cheaper, unregulated imports. This undermines not only the domestic industry but also **Spain's strategic commitment to ethical and sustainable fishing**.

As the world's second-largest importer of squid and cuttlefish—and the EU's principal entry point for squid products—**Spain has the leverage and responsibility** to act. We urge the Spanish government to implement the following priority actions:

- **Improve transparency and accountability** of squid fishing activities, including through endorsement and implementation of the Global Charter for Fisheries Transparency.[27]
- **Conduct a detailed assessment** of existing import control measures specifically for squid, including species-specific analysis to target species associated with unregulated fisheries, such as Argentine shortfin.
- **Push at the EU level to expand the recently adopted verification criteria under Article 31** of the Implementing Regulation[28] of the EU IUU Regulation to explicitly include any species or vessel operating in unregulated fisheries—such as tuna, squid, and other species—within the scope of risk assessments for import controls.[29]
- **Reinforce and adapt import control mechanisms** to include more verification requests, rigorous checks, and investigate suspected cases of illegal fishing and forced labour on consignments of squid, such as Argentine shortfin squid—particularly when originating from unregulated high seas fisheries where such risks are elevated.
- Press, in coordination with the European Commission, for **strengthened oversight of squid imports across all Member States** to prevent 'control shopping', where products linked to IUU fishing may be routed through those with weaker enforcement.
- **Promote cooperation** between Spanish control authorities and Spanish-flagged vessels operating in the Southwest Atlantic to improve monitoring and detection of IUU activities by encouraging the timely flow of information on sighted non-EU fishing vessels from fishing grounds to the central authorities in the capital.
- **Promote cooperation** among major squid fishing nations to improve governance and push for sustainable practices in the Southwest Atlantic.

1 FAO Major Fishing Area 41.

2 Between 2019 and 2024, EJF conducted 169 interviews with Indonesian and Filipino crew members who worked on 110 squid jigging vessels, covering around 20% of the foreign fleet operating in Mile 201.

3 MercoPress (2017), 'Argentine night air patrolling reveals "city of floating lights" in the South Atlantic', 2 February 2017, https://en.mercopress.com/2017/02/02/argentine-night-air-patrolling-reveals-city-of-floating-lights-in-the-south-atlantic (accessed 12 June 2025)

4 Carlowicz, M. (2013) 'Mystery Lights', NASA, https://svs.gsfc.nasa.gov/11409 (accessed 12 June 2025).

5 Analysis based on estimated fishing effort data in Global Fishing Watch of squid jiggers operating in the study area of the South West Atlantic between 2019 and 2024.

6 Ivanovic, M.L., Aubone, A., Rossi, G.R., Mc Innes, M.G., Buono, M.L., Prandoni, N.I., Elena, B., Cozzolino, E. y Allega L. (2022). Calamar argentino. Pesquería 2021. Informe final. Inf Téc Oficial INIDEP Nº 033/22, 25 pp.

7 See Xiang, D. ;, Li, Y. ;, Jiang, K. ;, Han, H. ;, Wang, Y. ;, Yang, S. ;, Zhang, H. ;, Xiang, D., Li, Y., Jiang, K., Han, H., Wang, Y., Yang, S., Zhang, H., & Sun, Y. (2024). Environmental Influences on Illex argentinus Trawling Grounds in the Southwest Atlantic High Seas. *Fishes 2024, Vol. 9, Page 209*, *9*(6), 209. https://doi.org/10.3390/FISHES9060209; Ko, C. Y., Lee, Y. C., Wang, Y. C., Hsu, H. H., Chow, C. H., Chen, R. G., Liu, T. H., Chen, C. S., Chiu, T. S., Chiang, D. H., Wu, R. F., & Tseng, W. L. (2024). Modulations of ocean-atmosphere interactions on squid abundance over Southwest Atlantic. *Environmental Research*, *250*, 118444. https://doi.org/10.1016/J.ENVRES.2024.118444; Xiang, D. ;, Li, Y. ;, Jiang, K. ;, Han, H. ;, Wang, Y. ;, Yang, S. ;, Zhang, H. ;, Xiang, D., Li, Y., Jiang, K., Han, H., Wang, Y., Yang, S., Zhang, H., & Sun, Y. (2024). Environmental Influences on Illex argentinus Trawling Grounds in the Southwest Atlantic High Seas. *Fishes 2024, Vol. 9, Page 209*, *9*(6), 209. https://doi.org/10.3390/FISHES9060209

8 Ivanovich, M., pers. comm. to EJF, 6 March 2025.

9 Clarke, 2006; Jereb and Roper, 2010, cited in Arkhipkin, A. I., Rodhouse, P. G. K., Pierce, G. J., Sauer, W., Sakai, M., Allcock, L., Arguelles, J., Bower, J. R., Castillo, G., Ceriola, L., Chen, C. S., Chen, X., Diaz-Santana, M., Downey, N., González, A. F., Granados Amores, J., Green, C. P., Guerra, A., Hendrickson, L. C., … Zeidberg, L. D. (2015). World Squid Fisheries. *Reviews in Fisheries Science & Aquaculture*, *23*(2), 92–252. https://doi.org/10.1080/23308249.2015.1026226

10 Original value provided by COMTRADE is 6,198,801,656 USD for the period 2019 - 2023. Converted to 7,306,476,160 EUR using exchange rate of 15 June 2020 (1 USD = 0.88899 EUR)

11 COMTRADE using HS commodity code 030741, 030742, 030743, 030749 and 160554. These commodity codes include trade in both cuttlefish and squid.

12 Eurostat/EasyComext import data for the EU and Spain under HS codes 03074220, 03074230, 03074240, 03074331, 03074333, 03074335, 03074338, 03074391, 03074392, 03074395, 03074940, 03074950 and 03074960 were analysed for the period 2019–2023. These categories include all species of squid available in Eurostat/EasyComext.

13 Eurostat/EasyComext import data for Spain (including intra-EU and extra-EU trade) under HS codes 03074220, 03074230, 03074240, 03074331, 03074333, 03074335, 03074338, 03074391, 03074392, 03074395, 03074940, 03074950 and 03074960 were analysed for the period 2019–2023. These categories include all species of squid available in Eurostat/EasyComext.

14 FAO (2025). FishStat: Global production by production source 1950-2023. In: FishStatJ. Available at www.fao.org/fishery/en/statistics/software/fishstatj. Licence: CC-BY-4.0. (accessed 28 July 2025).

15 Products in frozen form (reported under commodity code 03074392 of the EU Combined Nomenclature).

16 Eurostat/EasyComext import data for Spain under HS code 03074392 – *Illex* spp. squid, frozen were analysed for the period 2019–2023. While this category includes four species of shortfin squid, FAO FishStat data indicate that China, South Korea, Taiwan, Argentina, Uruguay, and the Falkland Islands (Malvinas) catch only *Illex argentinus*. Therefore, Spanish imports of frozen *Illex* spp. from these countries were assumed to refer to *I. argentinus*. This estimate remains approximate due to limitations in the reporting of high seas catches and the potential for frozen squid to be stored for months before export. EU imports from China may also include squid caught by foreign fleets and processed domestically. Finally, it is important to note that these figures include both *I. argentinus* caught on the high seas—where the fishery remains largely unregulated—and within Argentina's EEZ, where it is managed more effectively. Imports from Taiwan and South Korea may also include squid caught within the Falkland Islands (Malvinas) EEZ, which falls outside the scope of our research.

17 This reflects the proportion of catches by Taiwan and South Korea vessels that were taken in the Falkland Islands waters. All of China's catch of Illex during this period was taken on the high seas. See: Falkland Islands Government (2024) 'Fishery Statistics Vol. 29 (2015-2024)', https://www.falklands.gov.fk/fisheries/publications/fishery-statistics?task=download.send&id=362:fisheries-statistics-29-2024&catid=7.

18 Based on reported landings of Argentine shortfin squid for China in FAO Fishstat (423,607 tonnes) and imports of frozen

Illex spp. reported in Eurostat by the EU-27 (73,587 tonnes) and Spain (41,248 tonnes) from China in 2019-2023. According to FAO Fishstat, China does not catch any other species of *Illex* squid other than *Illex argentinus*. Therefore EU imports of frozen *Illex* spp. from China were assumed to be *I. argentinus*. This represents a rough estimate due to deficiencies in reporting of high seas *I. argentinus* catches and the potential for frozen squid to be stored for several months prior to export. 2023 was the most recent year for which landings data were available in FAO Fishstat. It is noted that EU imports of *Illex* squid from China may also include products caught by other fishing fleets and processed in the country.

19 Company-to-company trade data gathered via bills of lading by global market intelligence platforms, provides us with a snapshot of how squids tainted with human rights abuses entered the Spanish market. A payable database TradeData Pro was used for this analysis, https://tradedata.pro/. Open Source Intelligence methods and the 'Bait-to-Plate' database from Outlaw Ocean Project were used for analysing supply chain connections, https://b2p.theoutlawocean.com/.

20 With the fact that traded seafood products origins' were often not transparent or that their species were sometimes mislabeled, our analysis probably significantly undercounts the actual quantity of Argentine shortfin squid tainted with human rights abuses that enter the Spanish market.

21 Regarding the number of Spanish vessels targeting squid, it is currently not possible to determine the exact figure with publicly available data. The Spanish Registry of Vessels categorises vessels by gear type rather than by the species they are authorised to target. In general, squid can be caught using a wide variety of fishing gear, including jiggers (which Spain does not possess), purse seines, trawlers, artisanal methods such as gillnets and traps, and even longlines. Based on the registry, 27,070 out of 27,579 vessels (98%) are equipped with gear that can potentially be used to catch squid. See https://servicio.pesca.mapama.es/censo/ConsultaBuqueRegistro/Buques/Search (all gears selected except tuna vessels, cod vessels, 'rasco' and 'volanta'). However, the actual number of vessels significantly engaged in squid fishing is likely much lower. For example, approximately 70% of Spain's national squid production comes from the Southwest Atlantic, where only around 30 Spanish-flagged trawlers are active.

22 FAO (2025). FishStat: Global production by production source 1950-2023. In: FishStatJ. Available at www.fao.org/fishery/en/statistics/software/fishstatj. Licence: CC-BY-4.0. (accessed 28 July 2025).

23 Atlantic, Eastern Central; Atlantic, Northeast; Atlantic, Northwest; Atlantic, Southeast; Atlantic, Southwest and Mediterranean and Black Sea.

24 Based on publicly available data, it is not possible to determine whether the squid was caught in the high seas or national waters parts of the relevant FAO Major Fishing Areas. As a proxy, by looking at apparent fishing hours in GFW platform, most fishing in Eastern Central Atlantic, Northeast Atlantic and the Mediterranean and Black Sea by Spanish flagged-vessels using trawlers, purse seines, pots and traps and fixed gear (gear susceptible to catching squid) takes place within the Spanish EEZ.

25 Ministerio de Agricultura, Pesca y Alimentacion (2025) 'La pesca en el Atlantico Sudoeste', accessed on 20 June 2025, https://www.mapa.gob.es/en/pesca/temas/planes-de-gestion-y-recuperacion-de-especies/atlanticosudoeste

26 Industry source, pers. comm. to EJF, 5 May 2025.

27 Coalition for Global Fisheries Transparency (2024), 'Global Charter for Fisheries Transparency', https://fisheriestransparency.net/wp-content/uploads/2024/10/Coalition-for-Fisheries-Transparency-Global-Charter-2024-EN.pdf (accessed 2 August 2025).

28 Commission implementing Regulation (EU) 2025/1522 of 28 July 2025 amending Regulation (EC) No 1010/2009 laying down rules for the implementation of Council Regulation (EC) No 1005/2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing. https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=OJ:L_202501522

29 Commission implementing Regulation (EU) 2025/1522 of 28 July 2025 amending Regulation (EC) No 1010/2009 laying down rules for the implementation of Council Regulation (EC) No 1005/2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing. https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=OJ:L_202501522

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