

# Illegal, Unreported and Unregulated Fishing and Transnational Organized Crime



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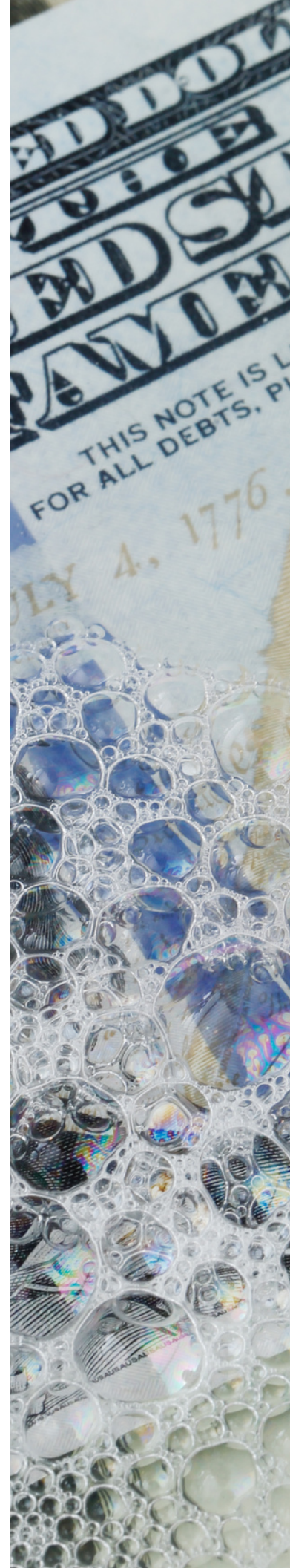
# Executive Summary

Sustainable fisheries bring economic security, increased employment, and food security to communities around the world but Illegal, Unreported, and Unregulated (IUU) fishing threatens these gains, and at scale, jeopardizes the economic, social, and political stability of coastal states. IUU fishing is not always an isolated problem; it can be an indicator of crimes unrelated to the fishing industry. Organized criminal syndicates utilize illegal fishing operations to traffick humans, drugs, firearms, and wildlife. They avoid detection through corruption, bribery, and money laundering. This linkage poses a challenge for government, industry, and civil organizations to effectively address the nature of these crimes because existing legislation and regulatory frameworks are limited in their monitoring and enforcement abilities to locate and prosecute IUU fishers and the connected organized criminal networks.

An analysis of literature and feedback from subject matter experts from governmental organizations and NGOs illuminated the importance of addressing the convergence of IUU fishing and transnational organized crime, such as in the Mexican totoaba case study and the South African abalone case study detailed in this issue brief.

To more effectively prevent both illegal fishing and transnational organized crime, counter-IUU regulatory frameworks and enforcement mechanisms need to acknowledge their association with transnational organized crime and include methods for deterrence. Critical first steps toward addressing the crime convergence of IUU fishing and transnational organized crime proposed are:

1. NGO campaigns can increase international pressure and demand legislative action against IUU fishing and transnational organized crime.
2. The United Nations Convention against Transnational Organized Crime should incentivize information sharing and cooperation between countries to increase the effectiveness of investigations.
3. The United Nations should establish standardized terms and definitions for transnational organized crime and IUU fishing.







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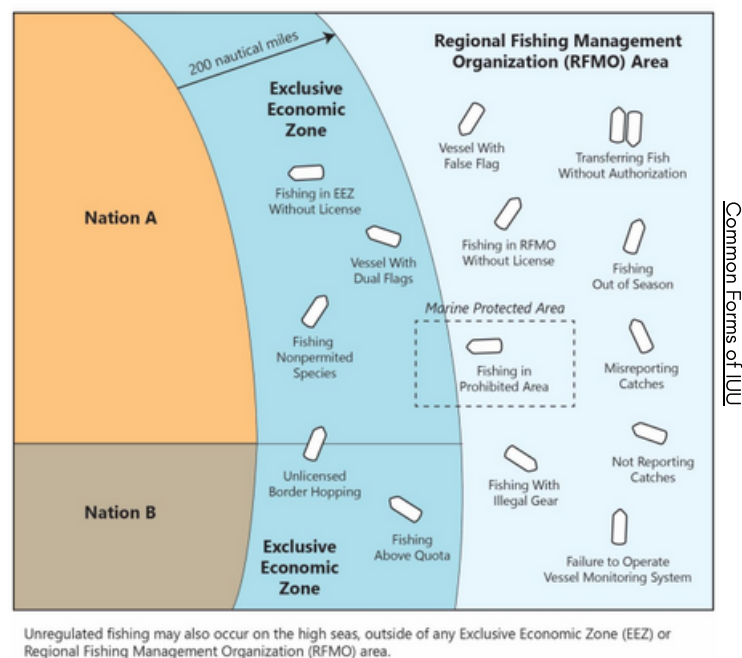
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# Introduction

820 million people in the world rely on the fishing industry as a source of income and more than 3.3 billion people rely on fish for 20% of their animal protein intake. Seafood offers significant nutritional benefits which can help limit hunger and malnutrition and support food security. Average global fish consumption has been steadily increasing at an annual rate of 3.1% from 1961 to 2017, according to the United Nations Food and Agriculture Organization (FAO). This increase can be attributed to the expansion of fish production, global seafood trade, and processing and distribution developments. Healthy fisheries benefit a community's economy, health, and livelihood, but IUU fishing undermines regional and national efforts to sustainably manage and conserve fish stocks. Unsustainable fishing practices including IUU fishing can cause habitat destruction (e.g., dynamic fishing, use of prohibited fishing gear) and loss of biodiversity (e.g., overharvesting, fishing in protected nursery areas), and collapse fisheries over time. In 2017, the FAO found that 34.2% of global fish stocks are at biologically unsustainable levels. Illegal, Unreported, and Unregulated (IUU) fishing contributes to the depletion of fish stocks and threatens sustainable global fisheries which leads to increased fishing costs, higher market prices, and greater economic losses.

The term 'IUU fishing' encompasses practices that are clearly illegal or just beyond the scope of regulation. IUU fishing can be found wherever there are fish to be caught, and all types of fishing vessels can be involved in IUU fishing regardless of their registration, size, or state of repair. IUU fishing occurs in both artisanal and industrial-scale fisheries, however they are primarily seen offshore. IUU fishers leverage an array of legal and illegal activities to avoid detection and operate with impunity such as changing vessel names, obscuring identification markings, bribing enforcement officials, transshipment, using flags and ports of convenience, deactivating vessel monitoring systems, and carrying fraudulent ship documents.

IUU fishing is driven by economic incentives because these crimes are generally low-risk and high reward. IUU fishing is relatively low-risk because, typically, actors engaged in IUU fishing operate in areas of poor governance, gaps in legal frameworks, and monitoring. In these areas, IUU fishing is rarely detected, fined, or prosecuted. IUU fishing is high-reward; a 2009 study by David Agnew estimates that annual **global losses due to IUU fishing are valued between USD \$10 billion and USD \$23.5 billion** annually, representing between 11 and 26 million tonnes of fish. Globalization has fueled increased demand and therefore the market price of IUU and legally harvested seafood.



Common Forms of IUU

Fines for vessels engaging in IUU operations do not have a substantial deterrent effect because the potential fines do not match or outweigh the benefits accrued from IUU fishing activities. A 2014 study by Don Liddick found that in IUU fishing, “the profits of a ship from a single voyage may significantly exceed the price of the ship itself.” IUU fishers avoid overhead costs like permits and associated fees which further increases their profit margin.

IUU fishing can point to fisheries crimes throughout the supply chain, including document fraud, corruption, tax evasion, money laundering, forced labor, illicit trade, and misrepresentation. In addition to fisheries crimes, IUU fishing can indicate the existence of other crimes committed within the fisheries sector, some of which can be transnational organized crimes. Transnational organized crime involves profit-motivated criminal activities that cross international borders and have global consequences. The nature of transnational organized crime operations can vary in scope and severity, but they all require organized coordination to carry out cross-border operations. Crimes threaten peace and security and destabilize economic, social, cultural, and political development in countries, regions, and local communities.

Common forms of transnational organized crime include the trafficking of drugs, humans, firearms, counterfeit goods, and wildlife, smuggling of migrants, piracy, environmental resource crimes, terrorism, and cybercrimes. Transnational organized crime is a huge industry; a 2011 Report from the United Nations Office on Drugs and Crime (UNODC) found that **transnational organized crime generated USD \$870 billion** in 2009.

The United Nations Convention against Transnational Organized Crime (UNTOC) is the primary legally binding international agreement used to combat transnational organized crime and prioritize international cooperation, though it does not contain a clear definition of transnational organized crime. Efforts to combat transnational organized crime focus on the inherent features of criminal groups and illicit markets.

Criminal groups are classified as either

- 1) a group of individuals engaged in illicit activities, or
- 2) a number of illicit activities that some individuals or a group of individuals happen to be a part of.

The latter is more common and this structure shows the resilience of illicit markets; if a group of individuals are arrested and incarcerated, activities still continue. To prevent transnational crimes from continuously occurring it is necessary to address these dynamics.

### Organized criminal groups will:

- Target fishers engaging in poaching
- Impose rules on and extort small-scale fishers harvesting low-value seafood to only sell to the cartel
- Target large companies fishing high-value species primarily for export last
- Extort both legal and illegal fishers



# Combating Transnational Organized Crime

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IUU fishing can be an indicator of transnational organized crime occurring in the fishing industry. Specifically, IUU fishing has been linked to human trafficking, drug trafficking, wildlife trafficking, and piracy, as detailed below. According to the FBI, criminal groups operating in global illicit markets may engage in a wide array of crimes including corruption, extortion, and money laundering to protect their activities. Local communities may be the victims of these crimes, or of violence to ensure compliance with established illicit activities.

**Human trafficking** occurs across the world in two distinct contexts: forced labor and sexual exploitation. The secretive nature of IUU fishing operations create a demand for trafficking victims to work on board fishing vessels, rafts, fishing platforms, or in fish processing plants. Migrant laborers and fishers are vulnerable to this form of trafficking and are subject to coercion, physical abuse, and psychological abuse. In the 2011 UNODC Report: Transnational Organized Crime in the Fishing Industry, a 2006 ILO report deemed that 20% of workers onboard fishing vessels and 11% of workers in the fish processing sector were victims of forced labor. Sex trafficking is driven by individual fishers that happen to be associated with the fishing industry.

**Drug trafficking** of cocaine, opiates, cannabis, and amphetamine-type stimulants frequently occurs in the fishing industry, which provides a legitimate cover for illicit drug trade. Fishing vessels provide transportation, most commonly seen in trafficking of cocaine and amphetamine-type stimulants, and fishing distribution facilities and networks offer storage for illicit drugs. IUU fishing of living marine resources is a driver for drug trafficking of amphetamine-type stimulants and their precursors. Illicit networks work together and exchange illicit drugs for living marine resources. The market connection between IUU fishing and drug trafficking will likely increase as living marine resources become more valuable due to depleted fish stocks.

**Wildlife trafficking** is the illicit trade of wild flora and fauna which drives biodiversity loss. The poaching and smuggling of living marine resources occurs in IUU fishing operations which target high-value species to enter both legal and illegal markets. Southeast Asia and China have a high demand for wildlife and wildlife products as they can be used in traditional Chinese medicine or as a symbol of social status and wealth. It should be noted that the terms poaching and illegal fishing refer to the same action despite them each having clear definitions, and research suggests the terms are commonly used interchangeably in this context.

**Piracy** is the robbery of a vessel and/or its cargo or is the kidnapping of the vessel or crew for ransom. IUU fishing catalyzes piracy because the ultimate depletion of fish stocks in areas of high IUU fishing has caused fishers to turn to piracy for income; an example of this is piracy in Somalia. Piracy and IUU fishing also thrive on similar conditions such as weak governance and enforcement.

The transnational organized crimes of firearms trafficking and terrorism have been seen in IUU fishing, but to a lesser extent than the aforementioned crimes. The smuggling of migrants does not coincide with fishing operations. However, there have been instances of fishers accepting bribes to smuggle migrants which can be attributed to IUU fishing and overfishing because depleted fish stocks have created an oversupply of fishing vessels that smugglers can use.

In addition to large-scale crimes occurring in the fishing industry, there has been greater convergence between fisheries crime and organized crime regarding fraud, corruption, tax evasion, and money laundering. Bribery is the most common form of corruption which may be used to help illegal fishers obtain necessary documentation to fish or circumvent port inspections. The common forms used to commit tax evasion are to disguise the origin of the fish and mislabel fish products. Money laundering is used to integrate the proceeds from illicit activities into the legitimate economy.

Obtaining reliable information and data on transnational crime in a timely manner is too often limited to anecdotes and case studies. The UNODC established the Sharing Electronic Resources and Laws on Crime (SHERLOC) knowledge management portal which aids the sharing and accessibility of information pertaining to the implementation of UNTOC and the international framework against terrorism. SHERLOC is accessible to the public and contains databases on case law, competent national authorities, legislation, national and regional strategies, treaties, and bibliographic data which can be filtered by criteria such as country and type of crime. In addition to SHERLOC, INTERPOL manages 19 databases containing information on criminals and crimes which are shared with police agencies and can be useful for some transnational organized crime investigations such as firearms trafficking, counterfeit goods trafficking, and piracy. The INTERPOL Criminal Information System database employs a color-coded international notice system that is used by police to alert law enforcement agencies in other countries about potential crimes, criminals, and threats. SHERLOC and INTERPOL databases provide useful information and promote international cooperation. However, it is important to note that transnational organized crime is prosecuted at the national level in the country where a crime took place.





# Mexican Drug Cartels, Totoaba Smuggling, and China

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Transnational organized crime in IUU fishing can be difficult to recognize, monitor, and prosecute. Examination of cases regarding the illegal fishing of totoaba and abalone aims to demonstrate the complexity of these crimes in IUU fishing. The illegal fishing industry in Mexico is estimated to account for between 45% and 95% of national fish production.

The Sea of Cortez bordering Baja California is internationally known for the illegal fishing of an endangered and endemic species of fish called the totoaba. The totoaba almost reached extinction in 1975 due to overexploitation in the fishing industry. It has since been classified as an endangered species in Mexico which bans fishing and exportation of the species. Furthermore, the totoaba is internationally recognized as an endangered species per the CITES Appendix I list.

Illegal fishing of totoaba occurs for their highly valued swim bladders which are a gourmet specialty in China and used in Traditional Chinese Medicine. Large, dried, and **aged swim bladders sell for between USD 60,000 and USD 85,000 per kilogram**.

Totoaba are illegally fished using huge gillnets that can stretch more than 600 meters and accumulate a lot of bycatch, such as the vaquita porpoise which is a large marine mammal, and, similar to the totoaba, is endangered and endemic to the Northern Gulf of California. Gillnets used to illegally fish totoaba entangle and suffocate vaquita within minutes which has led the vaquita population to a 99% collapse in less than ten years. At the end of 2021, only seven or eight individuals of vaquita were located. This is not promising for Vaquita conservation efforts; however, the demise of its population has not influenced actors involved in the illegal fishing of totoaba.



NOAA Fisheries

Chinese traders used to directly interact with Mexican fishers who engaged in illegal fishing and smuggling operations. Traders would operate in fishing towns, contract local fishers for designated marine species, and organize transportation and trafficking back to China. However, the relationship between Chinese traders and Mexican fishers has changed since Mexican organized criminal groups have infiltrated legal and illegal fisheries. In the illicit totoaba trade, the Sinaloa Cartel has done this and purchases gillnets to fund Mexican poachers and sell the swim bladders to Chinese traders who still organize the trafficking routes through transit countries.

The Sinaloa Cartel is one of Mexico's most powerful organized crime groups, engaging in the illicit drug trade, and operating in as many as 50 countries. Sinaloa operates with the primary goal to monopolize legal and illegal totoaba fisheries in the Sea of Cortez. In addition to this, the Sinaloa Cartel has engaged and organized other fishing operations, such as the illegal fishing of shrimp.

To ensure effective control over legal and illegal fishing operations, the Sinaloa Cartel uses other complementary tactics. Organized crime groups show up in local communities to enforce their group's determined targets for fish harvest sales and the amount of harvest for a given species.

If targets are not met, then criminal groups use violence to maintain control. Additionally, the Sinaloa Cartel has paid small-scale fishers in drugs, like methamphetamine, instead of cash. This increases the Cartel's control and turns fishers into drug users which causes fishers deeper into criminality since they must sell the drugs to get cash.

Mexican cartels and Chinese criminal networks use **trade-based systems as a method of money laundering**. Trade-based systems involve the exchange of illicit goods to represent a value transfer; this method also bypasses anti-money-laundering mechanisms. In regard to illicit totoaba trade, the Sinaloa Cartel provides totoaba swim bladders to Chinese criminal networks in exchange for precursors necessary to manufacture illicit drugs like amphetamine-type stimulants. This method of a value transfer across two illicit markets increases the likelihood that criminal groups will avoid detection. Although, if this form of payment increased, Mexican cartels would likely increase the legal and illegal fishing to obtain greater quantities of drug precursors which has the potential to be devastating for living marine resources and biodiversity in Mexico.

Mexico and China did not act against illegal fishing and illicit totoaba trade until they faced substantial international pressure primarily due to advocacy for the near extinction of the vaquita population. Pressure and campaigns from intergovernmental organizations and the international environmental community caused both countries to begin their own investigations, seizures, and arrests of poachers. The Earth League International (ELI) 2018 Report: Operation Fake Gold first laid out the illicit totoaba supply chain and involvement of Mexican cartels and Chinese traders. The investigation uncovered information regarding persons of interest, illicit business activities, and trade networks involved which ELI compiled and presented to Mexican, Chinese, and U.S. authorities. Due to this, Operation Fake Gold led to the arrests of six Mexicans included in the illicit totoaba trade.

Earlier this year, the Brookings Institution released a report on China-Linked Wildlife Poaching and Trafficking in Mexico which states that as of January 2022, illegal fishing of totoaba had remained very intense with practically no enforcement present. Despite this, **Chinese and Mexican governments do not work together on joint investigations or law enforcement operations to address these crimes**. The Chinese government maintains the position that Mexico needs to enforce its own laws to prevent illegal fishing and trafficking operations. In Mexico, the government, law enforcement, and regulatory agencies are riddled with corruption, and environmental agencies lack necessary budgetary and personnel resources which has led to the absence of enforcement.



# Organized Crime in South Africa's Abalone Trade

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In South African waters, the endemic abalone species locally known as perlemoen has been illegally harvested and commercially exploited for more than 30 years. Illegal fishing of abalone is driven by East Asia where abalone meat is highly demanded and seen as a delicacy. The Global Initiative Against Transnational Organized Crime 2022 Report: Disrupting Abalone Harms found that between 2000 and 2016, 1/3 of all dried abalone imported to Hong Kong and is estimated value at USD 890 million.

Abalone poaching takes up more than half of South Africa's coastline, primarily along the country's West Coast. To obtain abalone, poachers either dive from shore or go out by boat which can involve advanced planning and bribes to officials. Divers shuck the animal from its shell underwater and either leave bags of the abalone meat underwater or on the coast to retrieve later to ensure that evidence of illegal fishing is not detected. Abalone is then dried at various facilities in South Africa, smuggled to neighboring countries, and laundered into licit markets for shipment to Hong Kong, the epicenter of international abalone trade, to enter East Asian markets.

The illegal fishing of abalone is the beginning of a prominent illicit trade network. East Asian criminal syndicates including Chinese Triads are the kingpins of the illegal abalone trade as they control all operations and participants involved such as the buyers, driers, and exporters. Syndicates hire local organized criminal groups as 'middlemen' to carry out abalone poaching and smuggling operations in South Africa. Previously hired middlemen are known to have come from organized criminal gangs in Cape Town, Somali networks, and Congolese criminal groups. In exchange for maintaining illicit abalone operations, middlemen receive precursors for methamphetamine, locally called *tik*, as a form of payment. Additionally, middlemen front drugs to divers who illegally harvest abalone and force them to work off acquired debt through continued poaching. This trade-based laundering of drugs for abalone greatly contributes to increased social and economic problems in South Africa.



SANBI - South African abalone

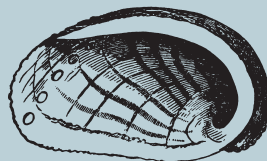


Illegal harvesting and the illicit market for abalone remained resilient through the 1990s because of 1) constant demand for abalone from Asia and 2) the lasting status of South African society. The apartheid was lifted in 1994, but reform was slow to develop in the fishing industry which offered historically disadvantaged small-scale fishers the opportunity to earn good money through illegal fishing.

South Africa is still a vulnerable region due to rampant poverty, high levels of inequality, and weak governance in the face of illicit economies. Corruption exists at all levels of government; agencies have seen low-level and high-level corruption through bribery which has led to weak regulations and lax enforcement, which enables suspects of poaching to walk free. Local police give notice about upcoming seizures and redirect poaching investigations. Despite significant levels of corruption and socio-economic limitations, South Africa has attempted many efforts to deter abalone poaching, but all efforts have been unsuccessful. Interestingly, the South African abalone species was listed as a CITES Appendix III species in 2007 and delisted from CITES three years later in 2010. The classification initially aimed to halt illegal abalone trade through the use of permits and inspections, however, these efforts took considerable time and negatively impacted the legal abalone industry. Since the delisting, the national fisheries agency in South Africa has stopped performing stock assessments of abalone so the actual status of the species is unknown.

China and Hong Kong have not taken significant action against the illicit abalone trade as laundered abalone reaches their licit markets. Hong Kong authorities are aware of the illegal fishing of abalone, however regulatory controls and laws do not exist to prevent the species' trade and sale. Additionally, abalone traders in Hong Kong and China are knowledgeable of the illicit abalone trade in South Africa and some traders know that Chinese criminal syndicates manage and operate the illicit network. Despite the common knowledge of this in Hong Kong and China, there has not been a serious investigation of abalone criminal networks to determine their impact. However, China could be swayed to investigate the illicit trade if there was international pressure.

South Africa has had a high number of abalone seizures, averaging one per day since 2010 according to the 2018 Traffic Report: Empty Shells. However, South African national intervention has had very little impact on the deterrence of illegal harvesting of abalone. Previous joint investigations between South Africa and Hong Kong have occurred on a number of occasions and have been successful. This suggests the need for international cooperation to increase between South Africa and China and other Asian countries to address the illicit abalone trade and associated transnational organized crime.



# Current Frameworks

Legislative frameworks are used to determine the scope and severity for how a policy problem is addressed at the local, regional, national, and international levels. Frameworks can determine if States have requirements for implementation which occur when a framework is binding versus non-binding or voluntary. Additionally, legislative frameworks lay out the given policy problem to propose a solution or at bare minimum raise awareness of the problem at a greater scale.

IUU fishing and transnational organized crime operate at the global scale and to effectively address the environmental, economic, social, political, and security impacts legislative frameworks need to operate at the international level and introduce strict implementation. Crimes are prosecuted at the national level, and as seen in both case studies the Mexican, South African, Chinese, and East Asian governments do not frequently or willingly engage in joint investigations. The nature of this issue reveals limitations with existing frameworks. Additionally, relevant Inter-governmental and regional organizations that tackle aspects of this issue are examined.

## International Plan of Action to Prevent, Deter, and Eliminate Illegal, Unreported, and Unregulated Fishing (IPOA-IUU)

The FAO Committee on Fisheries adopted the IPOA-IUU in 2001. This is a voluntary, non-binding framework that is an elaboration of the FAO Code of Conduct for Responsible Fisheries. [IPOA-IUU](#) defines Illegal, Unreported, and Unregulated fishing providing a universal definition:

### Illegal Fishing

1. Conducted by national or foreign vessels in waters under the jurisdiction of a State, without the permission of that State, or in contravention of its laws and regulations
2. Conducted by vessels flying the flag of States that are parties to a relevant regional fisheries management organization but operate in contravention of the conservation and management measures adopted by that organization and by which the States are bound, or relevant provisions of the applicable international law
3. In violation of national laws or international obligations, including those undertaken by cooperating States to a relevant regional fisheries management organization.

### Unreported Fishing

1. Which have not been reported, or have been misreported, to the relevant national authority, in contravention of national laws and regulations
2. Undertaken in the area of competence of a relevant regional fisheries management organization which have not been reported or have been misreported, in contravention of the reporting procedures of that organization

### Unregulated Fishing

1. In the area of application of a relevant regional fisheries management organization that are conducted by vessels without nationality, or by those flying the flag of a State not party to that organization, or by a fishing entity, in a manner that is not consistent with or contravenes the conservation and management measures of that organization
2. In areas or for fish stocks in relation to which there are no applicable conservation or management measures and where such fishing activities are conducted in a manner inconsistent with State responsibilities for the conservation of living marine resources under international law.

## Agreement on Port State Measures (PSMA)

PSMA is the first binding international agreement that is designed to target and deter IUU fishing. Having entered into force with an initial 30 Parties in June 2016, the PSMA now has a total of 70 Parties. The primary objective is to implement effective port State measures to ensure the long-term conservation and sustainable use of living marine resources and ecosystems. Measures involve a minimum set of standards that must be applied when foreign vessels enter a Party's ports or seek entry to their ports; these measures are adopted into Parties' national legislation and into regional fisheries management organizations' (RFMOs) conservation and management measures. PSMA also places importance on regional cooperation, information exchange, global awareness-raising, and capacity building programs.

## United Nations Convention against Transnational Organized Crime and the Protocols Thereto (UNTOC)

The UNTOC is legally-binding and entered into force September 2003, and is the main international framework used to fight transnational organized crime. UNTOC is implemented by the UNODC and intentionally does not provide a clear definition of transnational organized crime or a list of crimes so that the Convention can be applied to new, emerging crimes. The three Protocols of UNTOC outline and address human trafficking, the smuggling of migrants, and firearms trafficking to provide targeted frameworks. The UNTOC details that an offense is transnational in nature if one of the following occur:

1. It is committed in more than one State
2. It is committed in one State but a substantial part of its preparation, planning, direction, or control takes place in another State,
3. It is committed in one State but involves an organized criminal group that engages in criminal activities in more than one State, or
4. It is committed in one State but has substantial effects in another State.

## Regional Fisheries Management Organizations (RFMOs)

RFMOs are regional frameworks that aim to improve intergovernmental cooperation, and the conservation and management of global fish stocks found on the high seas. There are 20 RFMOs which use a number of tools, in addition to conservation and management measures, to prevent IUU fishing and transnational crimes from occurring, such as IUU vessel lists, transshipment regulations, inspection procedures, and sanctions.



## International Declaration on Transnational Organized Crime in the Global Fishing Industry (Copenhagen Declaration)

The Copenhagen Declaration is a non-binding declaration adopted by 28 States to acknowledge the existence of transnational organized crime in the global fishing industry which has significant effects on the economy, environment, and human rights. The Declaration illustrates the importance of inter-agency cooperation, international cooperation, and support for developing countries.

## Global Record of Fishing Vessels, Refrigerated Transport Vessels, and Supply Vessels (Global Record)

The Global Record is an FAO program that operates within existing legal frameworks, including the PSMA, to deter IUU fishing and by compiling fishing vessel information on an online platform to increase the sharing and accessibility of information among States, RFMOs, and NGOs.

## International Criminal Police Organization (INTERPOL)

INTERPOL is an intergovernmental organization comprised of 195 member countries which works to enhance police investigations to dismantle international criminal networks. INTERPOL connects countries to increase the sharing and accessibility of information on both criminals and illegal activity.

INTERPOL prioritizes fisheries crimes related to IUU fishing as well as other environmental crimes through notices and working groups. Color-coded notices are used to alert countries of vessels or associated suspects and specific crimes. INTERPOL's Environmental Security Program, Global Fisheries Enforcement Team, and the Fisheries Crime Working Group aim to address fisheries crime, conduct investigations, and increase international communication.



# Recommendations

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The illegal fishing industry is greatly entwined with transnational organized crime and illicit trade, but existing legislative frameworks do not effectively address the complexity of these issues. In order to properly dismantle criminal economies that use IUU fishing operations as a crutch, I propose the following recommendations for consideration.

NGOs should increase international pressure and demand legislative action against IUU fishing and transnational organized crime.

NGO campaigns have the ability to increase public awareness and the power to sway a government, business, or civil organization stance on policy. The international community should increasingly vocalize concerns over ongoing harmful IUU fishing practices which can be exploited by organized criminal networks. This tactic of NGO campaigns and investigative reports was used in the totoaba case and impacted the engagement of national authorities with the issue.

The United Nations Convention against Transnational Organized Crime should incentivize information sharing and cooperation between countries to increase the effectiveness of investigations.

The UNTOC needs to develop a system which incentivizes and facilitates efficient ways to cooperate and share information. As a legally-binding Convention, the UNTOC does prioritize and encourage cooperation and information sharing between countries, however countries utilize these methods all of the time. As illustrated in the case studies, cooperation between countries was rare. The UNTOC needs to incentivize cooperation between countries to increase the effectiveness of investigations, and ultimately stop IUU fishing and eliminate transnational organized crime networks.

The United Nations should establish standardized terms and definitions for IUU fishing and transnational organized crime.

The United Nations needs to establish set terms and definitions for fisheries crimes. Currently, terms are open for interpretation and can carry different weight depending on the region or organization since there are not concrete definitions. This is seen in terms related to fisheries and wildlife trafficking, such as the use of illegal fishing and poaching. The United Nations' IPOA-IUU demonstrates how the UN can establish global definitions as it provides a standardized definition for illegal, unreported, and unregulated fishing, which has improved communication and understanding of the problem across local, regional, and international frameworks.



# Conclusion

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IUU fishing operations are significantly interconnected with transnational organized crime, the use of illegal practices, trafficking, smuggling, and money laundering pose a challenge to eliminate these illicit criminal networks. To effectively deter IUU fishing and transnational organized crime operations in the fishing industry, there needs to be increased vocalization of concerns from the international environmental community, greater cross-border information sharing and cooperation mechanisms, and standardized terminology designed for IUU fishing operations linked to transnational organized crime.

