The Fisheries Import Control Scheme Handbook

A guide to designing and implementing import controls that close markets to illegal, unreported, and unregulated (IUU) fishing

EU IUU FISHING COALITION

Environmental Justice Foundation · Oceana · The Nature Conservancy · Pew · WWF

IUU Forum Japan

United States IUU Fishing & Labor Rights Coalition

Our members include:

NRDC · WWF · ICAR International Corporate Accountability Roundtable · Oxfam America · FishWise · Conservation International · Greenpeace · Oceana · Humanity United Action · Corporate Accountability Lab

NOVEMBER 2025

Acknowledgements

This report has been produced by the EU IUU Fishing Coalition, with support from US IUU Fishing and Labor Rights Coalition and the IUU Forum Japan, led by the EU IUU Fishing Coalition's Researcher Eve Croxford.

Special thanks to:

Thomas Walsh, Nikolas Evangelides, Grace Howe, Benjamin Freitas, Max Valentine, Lindsay Ceron, Yukiko Kuwata, Shuhei Uematsu, Wakao Hanaoka, Aiko Yamauchi, Christina Callegari, Glenn Sant, and Gilles Hosch.

EU IUU Fishing Coalition

The Environmental Justice Foundation (EJF), Oceana, The Nature Conservancy (TNC), The Pew Charitable Trusts and WWF EU are working together to promote EU leadership in improving global fisheries transparency and governance to end illegal, unreported and unregulated (IUU) fishing.

U.S. IUU Fishing and Labor Rights Coalition

The U.S. IUU Fishing and Labor Rights Coalition brings together human rights and environmental organizations focused on the nexus of IUU fishing and labor rights in seafood supply chains. Members include: Conservation International, Corporate Accountability Lab, FishWise, Greenpeace USA, Humanity United Action, International Corporate Accountability Roundtable, National Resource Defense Council, Oceana, Oxfam America, and World Wildlife Fund.

IUU Forum Japan

The IUU Forum Japan was established in September 2017, consisting of NGOs and social ventures engaged in efforts for sustainable fisheries to jointly work on measures against IUU fishing. Current members are Environmental Defense Fund (EDF), Sailors for the Sea Japan (SFSJ), Seafood Legacy (SFL), UMITO Partners and World Wide Fund Japan (WWF Japan).

For more information contact:

Thomas Walsh, EU IUU Fishing Coalition Coordinator, tom.walsh@iuuwatch.eu
Penelope Kyritsis, U.S. IUU Fishing and Labor Rights Coalition Coordinator, hello@penelopekyritsis.com
Yukiko Kuwata, IUU Forum Japan Coordinator, yukiko.kuwata@seafoodlegacy.com

For more news, updates and documents supporting efforts to combat IUU fishing globally,
visit: www.iuuwatch.eu or contact: info@iuuwatch.eu
visit: https://iuuwatch.jp/en/ or contact: info@iuuwatch.jp
visit: https://www.linkedin.com/company/104048368/admin/dashboard/

Cite this document as: EU IUU Fishing Coalition, US IUU Fishing and Labor Rights Coalition, and IUU Forum Japan (2025) *The Fisheries Import Control Scheme Handbook*.

Contents

Acronyms

AIS	Automatic identification system
ASFIS	Aquatic Sciences and Fisheries Information System
CCAMLR	Commission for the Conservation of Antarctic Marine Living Resources
CCS	Catch certification scheme
CCTV	Closed circuit television
CDS	Catch documentation scheme
CMMs	Conservation and management measures
COFI	UN FAO Committee on Fisheries
CTEs	Critical tracking events
eBCD	ICCAT's Electronic Bluefin Tuna Catch Document Programme
e-CDS	Electronic CDS
EEZ	Exclusive economic zone
EM	Electronic monitoring
EU	European Union
FDA	Food and Drug Administration
FAO	United Nations Food and Agriculture Organization
FOC	Flag of convenience
GDST	Global Dialogue on Seafood Traceability
ICCAT	International Commission for the Conservation of Atlantic Tunas
ICS	Import control scheme
ILO	International Labour Organization
IMO	International Maritime Organization

IOTC	Indian Ocean Tuna Commission
IPOA-IUU	International Plan Of Action To Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing
IRCS	International Radio Call Sign
ITF	International Transport Workers' Federation
IUU	Illegal, unreported, and unregulated
KDE	Key data element
MCS	Monitoring, control, and surveillance
MMSI	Maritime Mobile Service Identity
NOAA	National Oceanic and Atmospheric Administration
PREDICT	Predictive Risk-Based Evaluation for Dynamic Import Compliance Targeting
PSMA	FAO Port State Measures Agreement
RFB	Regional Fisheries Body
RFMO	Regional Fisheries Management Organisation
SIMP	Seafood Import Monitoring Program
TREMs	Trade restrictive measures
UK	United Kingdom
UNCLOS	United National Convention on the Law of the Sea
US	The United States of America
UVI	Unique vessel identifier
VGCDS	The FAO's Voluntary Guidelines for Catch Documentation Schemes
VMS	Vessel monitoring system
WTO	World Trade Organisation

Glossary

Catch certificate – An official document accompanying a consignment and validated by the competent authority, allowing verifiable information about the seafood to be used through the supply chain (FAO, VGCDS).[1]

Catch certification scheme (CCS) – A unilateral Catch Documentation Scheme (known as the Catch Certification Scheme) introduced by the European Union in 2010 through the adoption of the EU IUU Regulation. It covers all marine wild-caught fish (with some exemptions) that are traded by non-EU countries into the EU market.

Catch documentation scheme (CDS) – A system with the primary purpose of helping determine throughout the supply chain whether fish originate from catches taken consistent with applicable national, regional and international conservation and management measures, established in accordance with relevant international obligations (FAO, VGCDS).[2]

CATCH IT system – An IT system that was launched by the European Commission (Version 1.0) on 7 May 2019. The system aims to digitalise the EU's current paper-based catch certification scheme. The CATCH IT system is only to be used on a voluntary basis by Member States and their national operators until the revision of the Control Regulation and its adoption, after which it will become mandatory from 10 January 2026. Non-EU countries can also use this system on a voluntary basis.

Consignment – Fish, which are either sent simultaneously from one exporter to one consignee or covered by a single transport document covering their shipment from the exporter to the consignee (FAO, VGCDS).[3]

Exclusive Economic Zone (EEZ) – An area beyond and adjacent to the territorial sea, under which the rights and jurisdiction of the coastal State and the rights and freedoms of other States are governed by the relevant provisions of the United Nations Convention on the Law of the Sea (UNCLOS). In the exclusive economic zone, the coastal State has "sovereign rights [and obligations] for the purpose of exploring and exploiting, conserving and managing the natural resources, whether living or non-living, of the waters superjacent to the seabed and of the seabed and its subsoil" (UNCLOS Article 56).[4]

Fishing vessel – Any vessel of any size used for, equipped for use for, or intended for use for the purposes of fishing or fishing-related activities, including support vessels, fish-processing vessels, vessels engaged in transshipment and carrier vessels equipped for the transportation of fishery products, except container vessels (FAO, VGCDS).[5]

Import control scheme (ICS) – A system that monitors seafood imports and aims to close markets to illegal, unreported and unregulated (IUU) fishing, i.e. any fish that has not been caught in line with national, international, and regional conservation and management measures and agreements. ICS have been adopted by a number of market States and can take the form of an FAO's VGCDS definition of a catch documentation scheme.[6]

Illegal, unreported, and unregulated (IUU) fishing – Throughout this handbook, we use the definition of IUU fishing provided in the United Nations Food and Agriculture Organization (FAO) International Plan of Action on Illegal, Unreported and Unregulated fishing (IPOA-IUU).

FAO Agreements on Port State Measures (PSMA) – The first binding international agreement specifically targeting IUU fishing.[7] This international treaty was approved by the Food and Agriculture Organization of the United Nations (FAO) Conference on 22 November 2009 and entered into force in June 2016. The main objective of this agreement is to prevent any vessels engaged in IUU fishing from using signatories' ports and landing their catch. Under this agreement, Parties agree to designate and publicise ports to which vessels may request entry and agree to require advance requests for port entry from vessels not entitled to fly their flag. The PSMA also establishes standards on how port States identify, inspect and handle vessels suspected of involvement in IUU fishing.

Mass balance reconciliation – The act of verifying the mass balance of a given product entering a CDS or ICS, "ensuring that the volumes obtained at the end of a supply chain segment do not exceed the volumes inserted at the beginning of the same segment".[8]

Monitoring, control, and surveillance (MCS) – In the case of oceans management and fisheries, MCS involves the implementation of operations necessary to affect an agreed policy and plan for oceans and fisheries management. These operations include measurement of fishing effort, regulating the conditions under which exploitation may be conducted and observations made to ensure compliance with regulatory controls.

Regional Fisheries Management Organisation (RFMO) – International organisations which regulate regional fishing activities in the high seas. While some RFMOs have a purely advisory role, most have management powers to set catch and fishing effort limits, technical measures and control obligations.

Supply chain – A sequence of processes involved in the production and distribution of fish from catch to the point of import in the end market, including events such as landing, transshipments, re-export, processing, and transport (FAO, VGCDS).[9]

Traceability – The ability to follow the movement of a food through specified stage(s) of production, processing and distribution (FAO, Codex Alimentarius Commission).[10]

Trade certificate – The certificate used when seafood products are exported, or re-exported as required under a CDS or ICS. A trade certificate will include the catch certificate of the product, the product's original and current form, and the volumes of the product. Trade certificates will be reissued as many times as necessary through different stages of the supply chain between countries.

Transshipment – The transfer of fish that have not previously been landed, from one vessel directly to another, at sea or in port (FAO, VGCDS).[11]

Validation – The act of signing, stamping and/or sealing catch or trade certificates by a competent authority who has jurisdiction over the relevant stage of the supply chain, by electronic or physical means.

Verification – The actions of a market State enacting its CDS or ICS to check the authenticity of a certificate, requesting assistance from the competent authority of which the product originated from.

Executive summary

Illegal, unreported, and unregulated (IUU) fishing is a severe threat to food security, and marine biodiversity worldwide. By undermining sustainable fisheries management and creating unfair competition for law-abiding fishers, IUU fishing threatens the integrity of global seafood supply chains and the livelihoods of those who depend on healthy fish stocks for food and income.[12,13] Furthermore, IUU fishing practices are linked to a host of other criminal and illegal activities, including labour[14] and human rights abuses.[15,16] Weak governance of fisheries imports in a country increases the likelihood that products of IUU fishing will enter the market.[17]

© Adobe Stock

Catch documentation schemes (CDS) are market-based tools that—when well designed and implemented—close markets to products derived from IUU fishing. Such schemes can be unilateral, implemented by a single market State that usually covers all or some imported species (in this handbook referred to as import control schemes; ICS), or multilateral, implemented by Regional Fisheries Management Organisations (RFMOs) that focus either on specific stocks (e.g. highly migratory tuna-like species) or other species in a specific geographic area. CDS foster long-term political and cultural changes that improve overall fisheries management.[18]

We—the EU IUU Fishing Coalition, the US IUU Fishing and Labor Rights Coalition, and the IUU Forum Japan—call for market States to rigorously scrutinise their seafood imports and, based on clear risk assessments and import profiles, take immediate and concrete market-related actions to close their market to products of IUU fishing, including by the establishment of effective ICS. As multilateral schemes have stalled in recent years while unilateral ones have proliferated, expanded to cover more species, or recognised the need to improve performance, **the aim of this Handbook is to provide technical guidance on establishing a unilateral ICS for wild-caught fisheries and assist policymakers in developing or improving such schemes.**

We acknowledge the varying levels of capacity and resources that States have available to them as they consider developing an ICS. We encourage States to take meaningful actions towards establishing a comprehensive and robust scheme aligned with the principles set out in the International Plan Of Action To Prevent, Deter And Eliminate Illegal, Unreported And Unregulated Fishing (IPOA-IUU).[19] As such, we include examples where market States are taking more incremental steps towards this goal and the lessons learnt from this approach, as well as best practice from existing schemes—both unilateral and multilateral—that States should aim for. Alongside developing an ICS, we encourage States to engage with relevant RFMOs and take an active role in encouraging the expansion and strengthening of multilateral schemes.

> We call for market States to rigorously scrutinise their seafood imports and, based on clear risk assessments and import profiles, take immediate and concrete market-related actions to close their market to products of IUU fishing, including by the establishment of effective import control schemes.

This Handbook begins by advising on the initial scoping phase a market State should undertake to better understand its seafood trade flows and the potential risks more relevant to it, including stakeholder engagement and legal assessments. We then outline the essential design elements that comprise an ICS, such as the different documentation types and key data elements (KDEs) required, digitalisation, and mutual recognition of other unilateral schemes. Implementation strategies are presented next, including risk assessments, consignment inspection, and refusal protocols. We detail capacity building for better governance of ICS, including the importance of sufficient capacity and resources for implementing authorities, interagency coordination, and best practice to encourage in exporting States. The assessment of the proposed system includes a socio-economic analysis of the investment versus returns and stakeholder consultations. Finally, we outline evaluation, review, and adaptation detailing performance monitoring and transparency, periodic reviews of the established scheme, and ongoing stakeholder engagement.

1 Introduction

Illegal, unreported, and unregulated (IUU) fishing is a global crisis, accounting for a fifth of total global fisheries catch and costing up to 23 billion USD annually.[20,21] It is one of the main drivers of overfishing, threatening food security, livelihoods, and marine biodiversity.[22,23] It occurs both within exclusive economic zones (EEZs)[24] and international waters, often targeting marine protected areas[25] and endangered species.[26] IUU fishing undermines sustainable fisheries management,[27] creates unfair competition for rule-abiding fishers, and is linked to organised crime, fisher mortality, and human rights abuses.[28,29,30] Therefore, it is essential for governments worldwide to use all available tools to tackle IUU fishing and stop illicit seafood from entering their market, including unilateral trade-related measures.[31]

Market States can strengthen global fisheries governance by requiring documentation on the legal origin of imported products as a condition for market access through the establishment of a unilateral import control scheme (ICS).[32] **The main objective of an ICS—in the context of fisheries—is to prevent, deter, and eliminate products of IUU fishing from entering market States and ensure that seafood was taken from catches consistent with applicable national, regional, and international conservation and management measures (CMMs).**[33] Effective ICS are unilateral regulatory systems that use catch documentation and traceability requirements to confirm compliance with applicable rules, whether domestic, regional or international. An effective ICS should incorporate the evaluation of risk, conform with international law, and be clear, transparent, and if possible, digital.[34] They may embed other tools and technology, such as centralised datasets (such as RFMO IUU vessel lists) and machine learning, to assess risk and ensure data accuracy across complex supply chains. These elements are crucial to ensure that the resulting ICS is fit-for-purpose and meets its objective.

Major market States, such as the European Union (EU), the United States (US), and Japan whose combined imports in 2022 were valued at USD 109.9 billion,[35] have developed unilateral ICS.

In 2008, the EU introduced its paper-based Catch Certification Scheme (CCS) through the adoption of the EU IUU Regulation.[36] It covers all wild capture fisheries traded by non-EU countries into the EU market, with some exemptions.[37] The EU requires a catch certificate from vessel operators which must be validated by the competent authority of the flag and, where appropriate, of the processing State—the country under which the vessel is registered or where processing took place. This is presented at the point of entry into the EU Member State and then imports are rejected if either unaccompanied by a valid catch certificate or found—or seriously suspected—to be linked to illegal or fraudulent activities. Fraudulent certificates are also used as evidence for the EU's 'carding scheme' where countries found to have inadequate fisheries management regimes can face trade sanctions by the EU.[38,39] In 2023, among other changes to its catch certificate, the EU introduced CATCH IT[40] which fully digitalises the CCS, addressing implementation challenges

of the paper-based system.[41,42] Starting as a voluntary tool, it will become mandatory from January 2026 for EU importers and Member States.[43] Despite the system's weaknesses, we consider the EU CCS to be one of the best iterations of a unilateral ICS currently in force and is exemplar for other market States contemplating the introduction of an ICS.

The US introduced the Seafood Import Monitoring Program (SIMP) in 2016,[44] covering 13 species groups identified as being of high risk of IUU fishing and/or seafood fraud.[45] As a condition of import, the National Oceanic and Atmospheric Administration (NOAA) Fisheries requires importers to hold an annually-renewable International Fisheries Trade Permit and maintain records from harvest to point of entry into the US for covered fish and fish products. NOAA Fisheries conducts random and targeted audits after the products have entered the US market. Unlike the EU's scheme, SIMP places importers as legally responsible for verifying import information and does not require the submission of catch data prior to entry, meaning products enter the market before issues are detected.[46] Following an internal review and extensive stakeholder consultation, NOAA released an Action Plan in November 2024 to improve SIMP.[47] This Action Plan aims to strengthen the SIMP's efficacy in blocking IUU-caught seafood through expanded species coverage, pre-entry submission of paperwork, enhanced risk-screening, greater interagency coordination, and a voluntary pilot programme for inter-governmental data verification.[48] While NOAA Fisheries intends to implement components of the SIMP Action Plan, at the time of publication it is unclear which elements of the action plan will be delayed or abandoned.

In December 2022, Japan established its ICS through the Act on Ensuring the Proper Domestic Distribution and Importation of Specified Aquatic Animals and Plants (Act) and based on the EU catch certification scheme.[49] It's the world's third comprehensive anti-IUU fishing control system, established after the EU IUU Regulation and the US SIMP. Japan's scheme currently covers imported species recognised through risk assessment to be particularly vulnerable to IUU fishing by foreign flagged vessels.[50] The Act also covers domestic catch, although only abalone, sea cucumber, and glass eel are covered from December 2025, and Pacific bluefin tuna from April 2026.

> While the growing number of unilateral ICS is encouraging, it has led to a patchwork of non-harmonised import controls. This fragmentation, compounded by limited multilateral and transboundary cooperation, makes it harder to close loopholes and prevent illicit actors from diverting catches to points of less resistance.

Box 1. Multilateral Catch Documentation Schemes

Multilateral CDS are another form of market-related measures taken to prevent, deter, and eliminate IUU fishing.[51] Multilateral schemes are implemented by Regional Fisheries Bodies (RFBs), regulating how resources may be extracted from a given fishery, as well as under what conditions they may enter international trade. These regulations must be followed and complied with by any contracting parties fishing, processing, or trading resources within their convention area. A product of the post-World War II international order, around 20 RFBs are in existence today. Of these, only three have established a CDS for a small subset of the stocks they manage, a process that often takes many years to bear fruits, if at all. For example, in the 2025 annual meeting of the Indian Ocean Tuna Commission (IOTC), the deliberations on establishing a CDS were paused for two years despite 11 meetings of its CDS working group since 2020 and an agreement in broad terms on the basic characteristics and scope of the future scheme.[52] Key RFMOs with established CDS we will draw examples from include the Commission for the Conservation of Antarctic Marine Living Resources (CCAMLR) and the International Commission for the Conservation of Atlantic Tunas (ICCAT).

While the growing number of unilateral ICS is encouraging, it has led to a patchwork of non-harmonised import controls. This fragmentation, compounded by limited multilateral and transboundary cooperation, makes it harder to close loopholes and prevent illicit actors from diverting catches to points of less resistance.[53] Further, the proliferation of misaligned unilateral schemes multiplies the opportunity for double-spend fraud by illicit actors. Double-spend fraud can happen when a catch certificate is legitimately duplicated by an operator if they are uncertain of the final destination of their catch, thus enabling the multiple uses of a single catch certificate for products of IUU fishing further down the line if ICS authorities are not aligned or in communication with one another.[54] Legitimate operators and businesses may also face greater administrative burden to comply with the import requirements of multiple markets, unfair competition between States with differing standards, and challenges with international coordination and collaboration as different systems may not be in a position to communicate with each other or generate mutually intelligible data.

This Handbook builds on the United Nations Food and Agriculture Organization's (FAO) Voluntary Guidelines for CDS (VSCDS),[55] to encourage harmonisation of unilateral ICS and share best practices and lessons learnt from major market States and multilateral schemes (See Annex 1 Methods). We aim to aid States in taking meaningful action towards building a comprehensive and robust scheme to prevent the trade of IUU fishing products and combat IUU fishing globally.

2

Benefits of an import control scheme

The goal of any ICS is to exclude, deter, and prevent products linked to IUU fishing from entering market States. ICS can promote full supply chain traceability and ensure that imported seafood was caught lawfully. An ICS goes beyond catch documentation requirements, and encompasses the implementation strategies that have to be enforced alongside documentation, to effectively close markets to products of IUU fishing. These include processes such as physical inspection of consignments, holding of products under investigation, and refused entry protocols.

1. Exclusion of products linked to IUU fishing

Import controls help improve transparency by establishing the legality of catches through the collection and reporting of data from harvest and transshipments[56] to landing, processing, and export.[57,58] This supply chain documentation may also assist and/or inform enforcement actions at national and regional/international level (e.g. the application of sanctions including through the IUU-listing of vessels). Verifications or physical inspections based on risk assessment, as a result of the analysis of data collected through an ICS, improves the efficient use of limited resources in the investigation and/or identification of suspicious catches linked to IUU fishing operations. Such targeted actions increase the likelihood of positive identifications of illegal catches and their exclusion from the market, cutting the financial gains for the illegal operator. [59]

2. Sustainable resource management

Import controls help to promote the sustainable management of fish stocks by using access to lucrative seafood markets as a tool to drive regulatory improvements in exporting States. These controls create strong economic incentives for governments and industry actors to adopt rigorous fisheries management frameworks, implement science-based catch limits, and invest in more effective compliance mechanisms. All of which help to prevent overfishing, which is the current status of over a third of global fish stocks.[60] Moreover, ICS contribute to broader governance improvements by increasing transparency in global seafood supply chains, bolstering oversight and accountability mechanisms, and strengthening monitoring and surveillance efforts.

3. Disincentivisation of human and labour rights abuses

Human and labour rights abuses are strongly associated with IUU fishing, including physical violence, salary withholding and deductions, human trafficking, and forced labour.[61,62] Import controls that incorporate labour-related data elements into their documentation requirements have a greater chance of detecting and deterring human and labour rights abuses.[63] By doing so, market States can prevent inadvertently supporting human rights abuses while holding perpetrators accountable. Currently, no existing ICS has key data elements (KDEs) within their

catch documentation requirements that specifically aid detection of human and labour rights abuses. However, the SIMP Action Plan outlines plans to incorporate two additional KDEs to address forced labour risks in seafood supply chains (see Best practice box 2: Labour-specific risk information and KDEs for more information).[64] The Global Dialogue for Seafood Traceability (GDST) Standard includes a KDE on human welfare policy standards in place on vessels, specifically asking 'What kind of human welfare, labor, or anti-slavery policy was in place on this vessel/trip?' (see more about the GDST Standard in **Box 2**).[65]

4. Market integrity and consumer confidence

As large consumers of seafood products and often the end destination of international fishing operations, market States have a strategic and economic interest, alongside an ethical responsibility, to ensure that their demand does not drive unsustainable or illegal practices. Consumers are also becoming more environmentally conscious, so confidence in the legal and sustainable origins of seafood is both increasingly desirable and essential for maintaining confidence in the integrity of products sold.[66] Sustainably sourced seafood improves brand value and increases sales and the bottom lines of businesses.[67,68] Further, robust import controls strengthen consumer confidence and can ensure that seafood is legal and true to product labelling. For example, there was a marked decrease in seafood mislabeling in the EU after the CCS was implemented.[69] Enhanced seafood traceability can increase seafood profits by reducing costs associated with food recalls and food waste, as well as improve operational efficiency.[70] As these systems establish a mechanism for the collection and reporting of data related to seafood catches it should enable pre-competitive platforms to exchange data and intelligence, and expedite verification activities, particularly when digital systems are involved.

5. Increased coordination, cooperation, and accountability

Information exchange, cross-checking data, and external verifications can help countries work together to ensure better management of fish stocks internationally.[71,72] Inter-governmental validations and risk-based verifications of catch and trade data can improve the efficiency and accuracy of ICS,[73] as well as creating an accountability mechanism for flag State responsibilities. Digital tools enable more efficient and faster data handling, secure cross-referencing, and ensure better risk identification compared to traditional paper-based systems.[74,75] By targeting high-risk imports for rigorous checks, countries can focus resources more effectively and reduce unnecessary administrative burdens on legitimate operators.[76] Further, when countries are in communication with one another by mutually recognising catch certificates and sharing data, they can prevent the opportunity for catch certificates to be duplicated and used for an illegitimate catch, known as double-spend fraud.[77]

Guidance for establishing an import control scheme

3 Guidelines: Design of an import control scheme

3.1 Scoping phase

© Peter Chadwick | WWF

3.1.1 Stakeholder engagement

Stakeholder feedback brings valuable on-the-ground insights, enhances transparency, and strengthens support for the scheme's establishment. As such, stakeholder engagement and consultation should be a priority throughout each stage of establishing the ICS. We first advise a comprehensive stakeholder consultation to be conducted when a government is considering whether to establish an ICS, to build a shared vision on the scheme's establishment.

All relevant stakeholders should be invited to feed into this process,[78] including the fishing industry (including small-scale fisheries, supply chain actors, and export partners), relevant government agencies (such as fisheries departments, and customs and border control), heads of municipalities, customs brokers, government agencies of exporting countries, RFMOs, local and Indigenous communities, civil society and non-governmental organisations both domestic and international who may have broader insights and expertise beyond environmental conservation, for example in labour rights, crew welfare, trafficking, international supply chains etc., and academia and research institutions.

Governments can consider establishing a stakeholder consultative forum, where the membership is made up of representatives from all stakeholder groups, convened and led by the government. The forum can meet when required to provide advice on the design of the ICS, and support its implementation and future development.

3.1.2 Legal assessment and scoping definition

When considering the establishment of an ICS, a legal assessment should be conducted to determine if new legislation is required to prohibit imports of seafood with sufficient proof it is linked with IUU fishing, and its compatibility with relevant international trade rules, such as the World Trade Organisation (WTO) framework. If existing laws are sufficient, the development of regulations and requirements may be adapted to meet this need. Where laws are not yet in place, the EU (Council Regulation (EC) No 1005/2008 and 2023/2842)[79,80] and US (Magnuson-Stevens Act import provisions and Tariff Act Section 307)[81] statutes serve as useful models for legislative language and approaches. If establishing an ICS that considers labour rights abuses in addition to IUU fishing, further specialised legal assessment might be needed. Section 307 of the U.S. Tariff Act can be used as model legislation for the prohibition of the importation of goods manufactured wholly or in part with forced labour.[82]

States must then define the objective of their ICS and ensure this is clear and simple, there should be no room for ambiguous interpretation as to what the scheme is setting out to achieve.[83] The EU's model language can be considered best practice for this, as it sets its clear objective at the very beginning of the EU IUU Regulation in Article 1 Subject matter and scope: "This Regulation establishes a Community system to prevent, deter and eliminate illegal, unreported and unregulated (IUU) fishing."[84]

The scope and coverage of their ICS requirements must then be defined. **A comprehensive system covering all seafood species should be the goal for all market States establishing an ICS and is the most effective way to close a market to products of IUU fishing.** Although, a step-wise approach to cover the species at highest risk first may initially be more feasible before eventually expanding to comprehensive coverage. States opting for a step-wise approach should next refer to section 3.1.3 Scoping risk assessment to prioritise high-risk fisheries, and should integrate regular review and expansion of species coverage into the legislation, as is exemplified by Japan's CDS.[85] In parallel, States should determine a leading department/competent authority that will assume the leading/coordinating role and any other relevant authorities with responsibility for implementation and enforcement of the ICS.

Best practice box 1: Comprehensive species coverage

The best practice starting point for an ICS is one that features comprehensive coverage, where the requirements apply to all imports/species, so that there are no gaps in coverage that can be exploited by illegal operators through intentional mislabelling or other seafood fraud.[86,87] The EU has the most comprehensive coverage of current existing systems with only a few exemptions.[88]

Comprehensive coverage creates a level playing field where the same requirements apply to all products, and provides regulatory certainty and simplicity including for the industry when developing traceability and accountability systems for compliance.

3.1.3 Scoping risk assessment

If a market State opts for a step-wise approach, a scoping risk assessment should be used to inform initial species coverage (**Figure 1**). This approach would ideally include a clear commitment and timeline for expanding the requirements to all seafood imports.

A word of caution when considering step-wise species coverage

For an ICS to be robust in achieving its main objective, as well as in resource use and operational effectiveness, a comprehensive approach is the optimal route.

If opting for a step-wise approach and leaving some species outside the scheme, market States create room for illicit seafood to be mislabelled as exempt species. Seafood mislabelling is a persistent threat to market integrity, where mislabelling rates in global and national markets are estimated at 30% and even higher for certain species groups.[89,90,91] Schemes only covering select species see an increase in seafood mislabelling for these species covered compared to those outside of the scheme, as seen in the US SIMP.[92] IUU fishing operators are likely mislabelling species to those not covered by the ICS to avoid scrutiny and detection by authorities. Comprehensive species coverage is therefore essential for closing this loophole.

By introducing a step-wise approach, although it may seem a more resource conservative approach at first, States are opting for repeated investment of resources and capacity into the future when they introduce new elements to the scheme. For example, to incorporate additional species, new stages of the supply chain have to be incorporated, enacting authorities and operators retrained, and systems reformatted and expanded to cover new vessels or gear segments that were previously outside the scope of the scheme. This can create resistance to modifying the scheme, both internally by those implementing the scheme and externally by supply chain actors and operators. Conversely, comprehensive species coverage instead involves all necessary system planning for every authority, supply chain actor, and stakeholder when designed as fully comprehensive from the outset.

Current unilateral schemes exemplify that if not designing an ICS as fully comprehensive from the beginning, steps towards this goal can be easily delayed and resisted, leaving the market exposed to heightened seafood fraud[93] and entry of IUU fishing products. States should be careful to avoid these design flaws that ultimately undermine and prevent markets from achieving the main objective of their scheme.

The scoping risk assessment involves assessing seafood imports by categorising exporting States and species based on a series of criteria, for example, the value of the product, quantity traded, and IUU fishing risks. States may create their own risk assessment criteria, and/or align these with other closely associated market States with ICS already in force, to harmonise risk criteria and establish a unified approach. Key factors to assess IUU fishing risks include (see **Box 2** for example risk criteria used by the US for determining SIMP species coverage):

- Flag State performance: Weak monitoring, control, and surveillance (MCS) systems can indicate higher IUU fishing risk. This assessment can be informed using a range of open

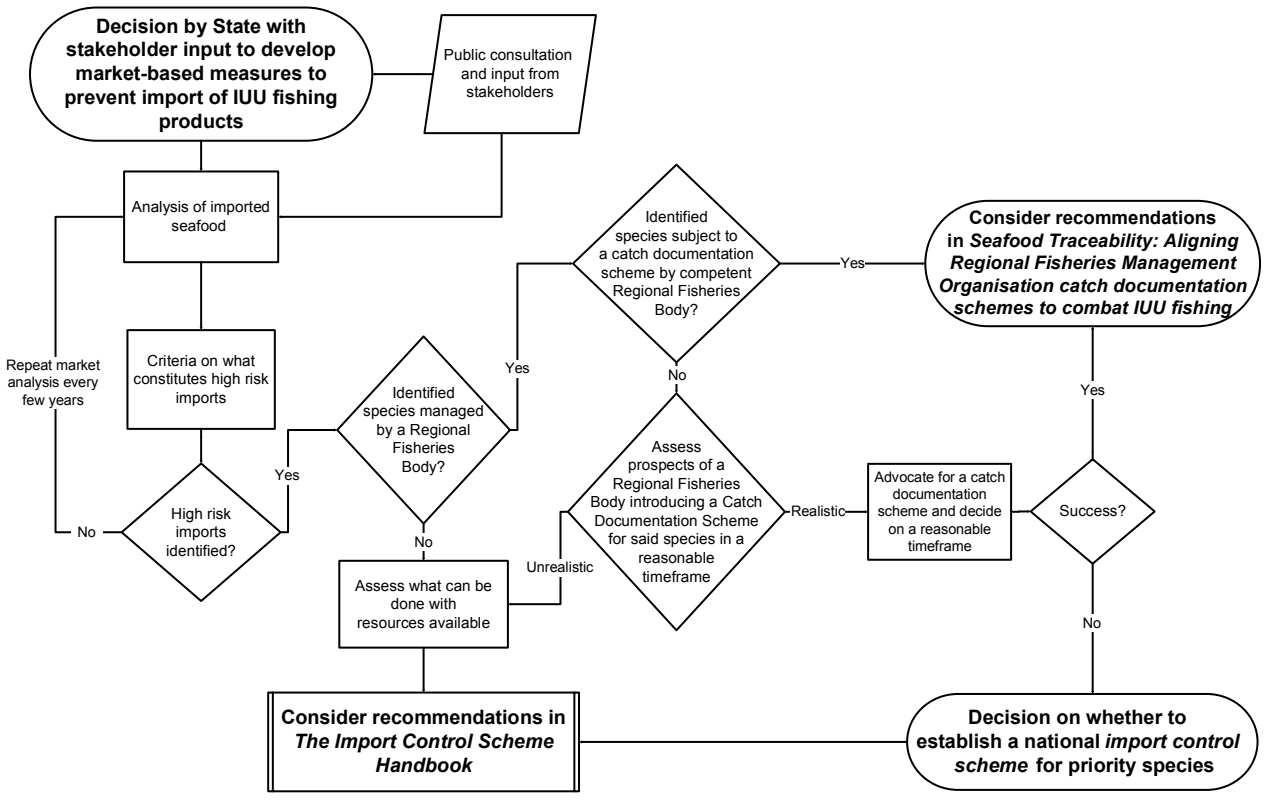
source indicators, for example, the carding and identification schemes by the EU and the US respectively (as they imply weak MCS by that flag State, and the EU specifically notes that fraudulent catch certificates are used for evidence in carding decisions), the IUU Fishing Risk Index score,[94] RFMO compliance reports, whether the flag State has ratified relevant international agreements, International Transport Workers' Federation's (ITFs) list of flags of convenience which evaluate labour (seafarers) standards, and other sources.

- History of IUU fishing: A history of IUU fishing activities in the fishery or partner State indicates elevated risk of IUU fishing.
- Fishery regulations: Whether the fishery is regulated by a regional fisheries body and to what degree. For example, the absence of a multilateral CDS could be an indicator for higher risk, for example squid which is largely fished in unregulated high seas areas outside the scope of RFMOs.[95]

It should be noted that since an ICS applies to products, not countries, this process does not imply differential application of the ICS based on flag State identity, but rather aims to identify the species-fishery combinations most vulnerable to IUU fishing and trade. Flag State performance should be seen as one of several indicators used to assess risk levels associated with a fishery or product. These indicators should not be used to exclude or label specific States. Rather, they serve to flag higher-risk supply chains irrespective of origin.

As such, stakeholder consultation is critical to ensuring the process is fair, comprehensive, and technically sound as it provides stakeholders the opportunity to input their expertise and identify potential oversights or bias in the initial risk analysis.[96]

Figure 1. Pathways market States should follow if opting for step-wise, risk-based approach to determining the species coverage of their ICS.



Box 2. Example risk criteria used by the US to determine SIMP species coverage.

Example of risk criteria used by the US (NOAA) in identifying the species covered by SIMP:[97]

- "Enforcement Capability: The existence and effectiveness of enforcement capability of the United States and other countries, which includes both the existing legal authority to enforce fisheries management laws and regulations and the capacity (e.g. resources, infrastructure, etc.) to enforce those laws and regulations throughout the geographic range of fishing activity for a species.
- Catch Documentation Scheme: The existence of a catch documentation scheme throughout the geographic range of fishing activity for a species, and the effectiveness of that scheme if it exists, including whether a lack of proper documentation leads to discrepancies between total allowable catch and trade volume of a species.
- Complexity of the Chain of Custody and Processing: Consideration of transparency of chain-of-custody for a species, such as the level of transshipment (in this context, the transfer of fish from one vessel to another, either at sea or in port) for a species, as well as the complexity of the supply chain and extent of processing (e.g. fish that goes across multiple country borders or fish that is commonly exported for processing or that is sold as fillet block vs. whole fish) as it pertains to comingling of species or catch.
- Species Misrepresentation: The history of known misrepresentation of a species related to substitution with another species, focused on mislabeling or other forms of misrepresentation of seafood products.
- Mislabeling or Other Misrepresentation: The history of known misrepresentation of information other than mislabeling related to species identification (e.g. customs misclassification or misrepresentation related to country of origin, whether product is wild vs aquaculture, or product weight).
- History of Violations: The history of violations of fisheries laws and regulations in the United States and abroad for a species, particularly those related to IUU fishing.
- Human Health Risks: History of mislabeling, other forms of misrepresentation, or species substitution leading to human health concerns for consumers, including in particular, incidents when misrepresentation of product introduced human health concerns due to different production, harvest, or handling standards, or when higher levels of harmful pathogens or other toxins were introduced directly from the substituted species."

If opting for the step-wise approach, once the target species have been identified, States should then plan for a phased species expansion of their scheme by establishing a timeline for review and expansion. For example, Japan is using their two-year review process which assesses their programme to propose further expansions. The risk assessment should then be reviewed and conducted again, ensuring the country stays up to date with changing risks.

3.2 Essential design elements

3.2.1 Catch certificates

A. Baseline key data elements for a robust catch certificate

An effective ICS relies on a catch certificate that accompanies the imported seafood and is verifiable and traceable throughout the supply chain. States should develop a catch certificate that captures critical tracking events (CTEs) through the inclusion of key data elements (KDEs), to trace seafood from boat to plate (see **Annex 2** for example formats of catch certificates by the EU, US, and Japan). These KDEs should capture who is fishing what, where, when, and how. We suggest the 17 KDEs recommended by the EU IUU Fishing Coalition as a minimum standard to be included in the catch certificate.[98]

A catch certificate should identify the '**who**' by requiring information on a vessel's unique vessel identifier (UVI), including its International Maritime Organization (IMO) number if the vessel is applicable to have one, the vessel's name (legally associated with its vessel identification number), and its international radio call sign (IRCS), a unique alphanumeric identity. By including all of these unique vessel identifiers, it is harder for IUU fishing vessels to change or mask their identity in attempts to cover their history. The 'who' information should also detail the vessel's flag to use this information in screening IUU fishing risk when the consignment is imported (see **Section 3.3.2 Risk assessment** for more information on import risk screening). A catch certificate should include information on the exporter / re-exporter companies: name, address, telephone number, point of exportation, and State of destination. Identity information of the import company, name, address, and telephone number, as well as the destination country (market

or processing State, for more information on accompanying documents for processing, see **Section 3.2.2 Trade documents**). This information is needed to keep track of the seafood product throughout the supply chain.

The '**what**' required in a catch certificate should detail what exactly the product is, describing the type of product (fresh, frozen, whole, fillets, fish meal, etc.) and the species name with the FAO's Aquatic Sciences and Fisheries Information System (ASFIS) 3-alpha code.[99] The estimated quantity of product should be recorded through estimated live weight (kg) as well as the actual live weight of the catch (kg)—this is key for checking calculations that may be needed if the seafood is processed further down the line. Further, this information can be verified by the authority where the fish were landed, modelled by the EU catch certificate (**Annex 2.1**). If a product is processed, then the processed weight (kg) should be reported too, as this will aid authorities in accounting for changes in weight due to processing and any subsequent risk flagging.

Transshipment information can be included as part of the main catch certificate requirements, like the EU, US, and Japan, either way these events must be documented (see **3.2.2 Complex Supply Chains** for more information).

A catch certificate should detail the '**when**' a catch or harvest took place. This will be useful for assessing fishing activity in an area that periodically closes to fishing.

The '**where**' should report where the catch or harvest took place using the International Organization for Standardization country codes when fishing occurs within an EEZ, the RFMO applicable if in a RFMO convention area, and the FAO area and sub-area fishing codes, and name of physical location and ISO country code for wild-caught farmed products. Ideally, the catch area should be further defined by expressing it, for example, in degrees and minutes (two decimals). This helps to improve traceability and flags the coastal State. With this information, the authorisation to fish in a coastal State's waters should be provided, including a unique number associated with the regulatory document granting permission to that fisher or vessel to fish, the authorised area, duration, species, quantity limits, gears, and the issuing authority. The port of landing is another key component of 'where' information for supply chain traceability, as it is the point where products transit from the sea-borne into the land-based supply chain. With this, the date of landing should be specified. If a product is processed, the processing plant location must be specified, along with its name, approval number by the licensing country, and health certificate number and date. The 'where' information is essential for composing the chain of locations the product has followed and thus the authorising authority(s) who should validate the catch certificate information.

Catch certificates must detail the '**how**' by requesting the fishing gear or farming method used to harvest the seafood, this will help authorities verify whether the catch was lawful. The FAO's International Standard Statistical Classification of Fishing Gear[100] should be used for aligned descriptions, and ICCAT's species-specific Electronic Bluefin Tuna Catch Document Programme (eBCD) also has a database of internationally accepted fishing gear codes.[101]

A simplified summary of the 17 KDEs can be found in **Table 1**, including how major market States compare in the KDE requirements of their catch certificates.[102] There is concerning disharmony between major market States in the KDE requirements of the catch certificates for their individual unilateral ICS.[103] This risks proliferating a patchwork of approaches that can be challenging for

stakeholders along the supply chain to navigate and illicit actors might exploit.[104] We advise that, at minimum, any State establishing an ICS should include in its catch certificate the 17 recommended baseline KDEs for a robust ICS, to prevent illicit actors from accessing the market.

> We urge States to keep in mind the drawbacks of any step-wise approach, in creating loopholes and resource burdens when later expanding the scheme.

South Korea's catch certificate has increased from previously including only five of the recommended KDEs to all 17. This is an example for how countries can begin their ICS coverage, by first implementing a smaller scale of catch documentation KDE requirements, and increasing this when possible. However, if opting for this approach we urge States to keep in mind the drawbacks of any step-wise approach, in creating loopholes and resource burdens when later expanding the scheme.

The FAO provides more detailed KDE examples for States to consider in the appendices of their 'Understanding and implementing catch documentation schemes – A guide for national authorities', covering KDEs on vessels, catch, transshipment, farming (see **Box 4. Wild caught farmed fish catch documentation coverage** for more information), and landing.[105]

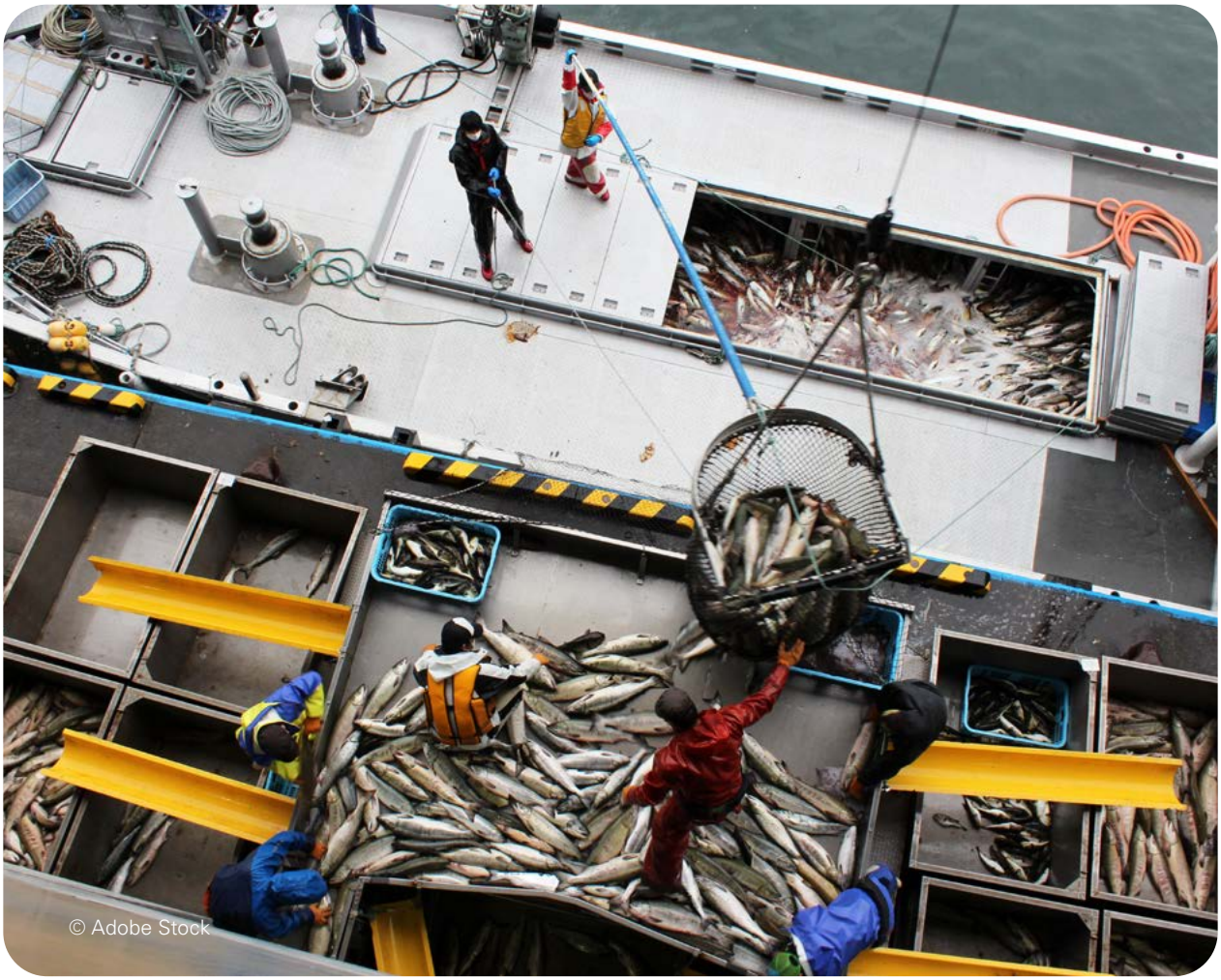

© Adobe Stock

Table 1. Comparison of major market States implementation of the 17 recommended KDEs for a robust ICS.

We detail the current requirements of the EU, US, Japan, UK, South Korea, and Australia's proposed KDE requirements, as of November 2025.[106,107]

Market States with established or proposed import control scheme		EU	US	Japan	UK	Republic of Korea	Australia's ICS proposal**
Import control scheme species coverage		All wild-caught seafood species (with some exemptions)	1,100 species within 13 species groups*	4 species groups*	All wild-caught seafood species (with some exemptions)	3 species*	Not yet established
	Key data element						
Who	Vessel name	Required	Required	Required	Required	Required	Required
	Unique vessel identifier (IMO number)	Required from 10.1.2026	Conditional	Conditional	Conditional	Required	Conditional
	Vessel flag	Required	Required	Required	Required	Required	Required
	International Radio Call Sign (IRCS)	Required	Not Required	Conditional	Required	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	Conditional	Required	Required	Required
	Estimated live weight (kg)	Required	Not Required	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	Conditional	Required	Required	Required	Required
When	Event date	Required	Required	Required	Required	Required	Required
Where	Catch area (defined with a clear distinction between the EEZ and the high seas)	Required from 10.1.2026	Required	Required	Not Required	Required	Required
	Authorisation to fish	Required	Conditional	Required	Required	Required	Conditional
	Port of landing	Required from 10.1.2026	Required	Not Required	Not Required	Required	Required
	Processing location	Required	Required	Required	Required	Required	Required
How	Fishing gear type or catch method	Required from 10.1.2026	Required	Conditional	Not Required	Required	Required

*The US SIMP 13 species groups covered are abalone, Atlantic cod, blue crab, dolphinfish, grouper, king crab, Pacific cod, red snapper, sea cucumber, sharks, shrimp, swordfish, and tuna.

*Japan's CDS covers squid and cuttlefish as one species group, pacific saury, mackerel, and sardines.

*The Republic of Korea's CDS covers only three species: Pacific saury, bobo croaker, and longneck croaker.

**Australia does not yet have an established catch documentation scheme, we have included their proposed KDEs.

Box 3: The Global Dialogue on Seafood Traceability

In early 2020, the GDST, an international, business-to-business platform convened and supported by WWF and the Global Food Traceability Center of the Institute of Food Technologists, released their GDST Standards and Guidelines for Interoperable Seafood Traceability Systems to track seafood products from point of origin to point of sale.[108] The GDST comprises more than 60 member companies, including many of the most influential retailers, brands and mid-supply chain processors in the sector. The GDST standard identifies the minimum data elements that need to be documented and transmitted within GDST-compliant seafood supply chains, covering both wild-capture and aquaculture products. Furthermore, the GDST standard governs the technical formats and nomenclatures for sharing data among interoperable traceability systems. This global standard is a critical step forward in the fight against illegal fishing and unethical labour practices.

This standard is continuously evolving through a participatory, multi-stakeholder dialogue and despite being developed entirely separately from the EU IUU Fishing Coalition's KDE recommendations, the GDST standard is nearly entirely aligned with the suggested baseline requirement.

Box 4. Wild-caught farmed fish catch documentation coverage

When wild-caught fish are caught and subsequently fattened in farms, considerable complexity is added to the supply chain, as well as uncertainty over the number of fish stocked. In addition, doubt over the estimated growth rates of farmed fish leaves room for the underestimation of size at capture and thus less tonnage used in an operators quota, giving opportunities for the laundering of fish caught by IUU fishing.[109]

The FAO provides a more detailed description of how to incorporate KDE coverage for wild-caught farmed fish within catch documentation.[110] Of existing CDS, the ICCAT has the most comprehensive catch documentation coverage for wild-caught farmed tunas detailing the three key components of fattening wild-caught fish in farms: towing/transfer, stocking and farming, and harvesting.[111] States can comply with the ICCAT if in the RFMO convention area, or encourage other tuna RFMOs to expand their farmed tuna KDEs to match the comprehensiveness of ICCATs.

Imports of wild-caught farmed fish into the EU are subject to the EU's IUU Regulation, only aquaculture products obtained from fry or larvae are excluded and do not require a catch certificate. Imported wild-caught farmed fish must be accompanied by the EU's catch certificate (see **Annex 2**), but no specific KDEs of importance to farmed fish are required.

B. Labour-specific key data elements

ICS can require importers to maintain records and report labour-specific information as a condition of import. To better identify human and labour rights violations in IUU fishing operations, we advise countries to consider the incorporation of labour-specific KDEs that can help flag IUU fishing and potential instances of forced labour. For example, KDEs detailing vessel owner, vessel captain, and time spent at sea can be used as labour-focused data to assess vessel-related risks and support targeted enforcement and accountability of vessel activity.[112]

The US SIMP Action Plan intends to incorporate the addition of two KDEs on fishing vessel trip dates and details on transshipment activities as a condition of entry to help better inform forced labour investigations.[113] Labour-specific KDEs can be used in the context of labour rights investigations by other government agencies, such as those for labour, customs, and justice/law enforcement. However, collecting labour-specific KDEs does not equal risk mitigation and does not address the root issue of labour abuses within supply chains. To address this, labour data needs to be actioned through a mixture of due diligence, worker engagement and empowerment, and strong regulation, including protecting fundamental rights to unionise and collectively bargain. For further examples of labour-specific risk information and KDEs for consideration, refer to **best practice box 2**.


© Martin Harvey | WWF

Best practice box 2: Labour-specific risk information and KDEs

The following KDEs, supply chain documentation, and labour-specific risk information can be considered as current best practice to be used to flag forced labour risks associated with imported seafood products. It is important to note that the information listed below 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 and their representative unions and worker organisations are key stakeholders that should be meaningfully engaged in government efforts to investigate forced labour.

Supply Chain Documentation	Associated forced labour risks
Worker and crew manifests at sea (including age and nationality)	Access to worker/crew manifests can help assess risks of child labour. It can also provide information on crew turnover, where a high level of turnover can indicate adverse or abusive work conditions aboard the vessel.
Disclosure of the duration of work at sea between trips to port, as well as duration of time that vessels and crew stayed ashore at ports	Excessive days at sea (more than three months), frequent port switching, and repeated transshipments of catch or transfer of crew at sea can serve as warning signs for International Labour Organization (ILO) forced labour indicators
Maritime Mobile Service Identity (MMSI) number of the vessel	MMSI numbers are associated with an automatic identification system (AIS) device. AIS data can be used to cross-reference importers' disclosures of the duration of work at sea, the length of time stayed at port, and whether vessels turn off their AIS systems which can indicate IUU fishing activity and potential forced labour.
Disclosure of crew 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; coupled with electronic monitoring (EM), crew can report labour-related issues in near-real time and back it up with video evidence.
Up-to-date records of labour and fishing/ vessel violations by competent authorities	Record keeping on previous violations provides regulators with information on a vessel's history, where poor past compliance record can indicate risk of abuse.

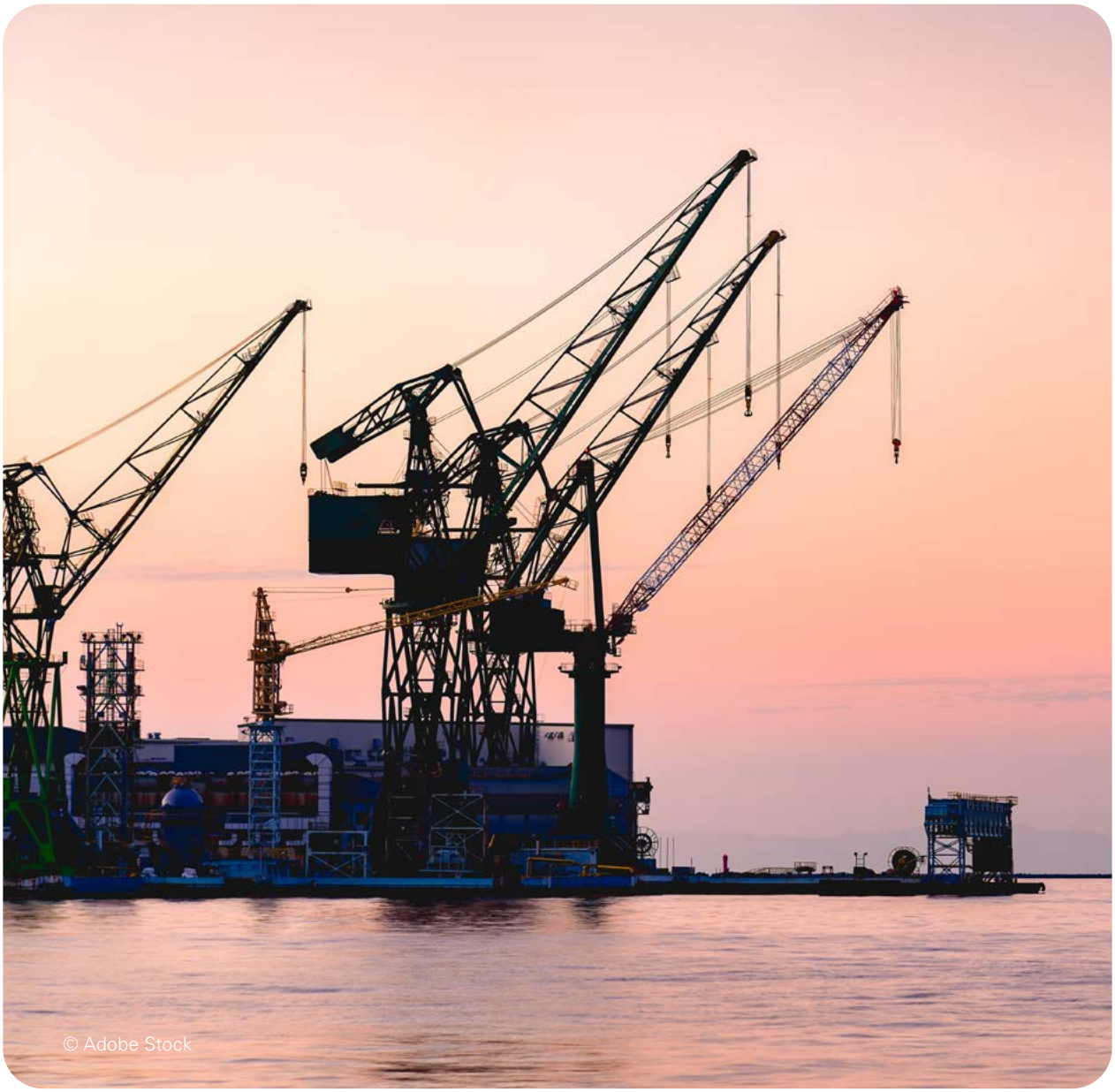
Additional risk information related to labour conditions from importers and supply chains can be considered:

- Labour recruitment channel (e.g. government or private; if private, the names of the recruitment agencies or brokers)
  - Number of workers from different countries recruited through each channel
  - Verification of no recruitment or placement fees paid, or guarantee deposits were charged to workers or deducted from wages
- Proof of crew access to effective, safe grievance mechanisms, including at-sea, that meet UN Guiding Principles on Business and Human Rights
- Contract provisions in the language of the worker in line with ILO Convention No. 188 (hour and conditions of work, rest hours, payment protocols, etc.)
- Worker retention of identity documents
- Direct reports from workers before and after trips to verify:
  - Pay stubs (withholding, fees, deductions, payment method)
  - Time at sea
  - Working hours
  - Freedom of movement
  - Freedom of association
  - Occupational health and safety
  - Communication access on board vessels
- Union/worker organisation membership of crew
  - Names and contact for information for unions or worker organisations representing workers
  - Ratio of unionised workers

3.2.2 Complex supply chains

Insufficient documentation at key stages of the supply chain—such as transshipment, processing, and transport—creates opportunities for products linked to IUU fishing to enter the market and be laundered. Transshipment is often used by IUU fishers to disguise illicit catches by mixing them with legally caught seafood and to inherit their documentation.[114] Transshipments also enable fishing vessels to evade monitoring and enforcement, e.g. port inspections, as they can be resupplied without returning to port for months or years at a time. Such prolonged operations at sea have been linked with human rights abuses, including human trafficking and de facto slavery, where captains keep their crew at sea indefinitely.[115]

The traceability challenge increases substantially when catches are split or processed, especially across jurisdictions, as the complex supply chain gives multiple opportunities for either the substitution or mixing of a legal catch with IUU caught seafood.[116,117] Further, processed seafood can obscure the origins of illegal fish by making them indistinguishable from legally caught fish after processing and packaging.[118]



Trade certificates help to improve traceability at critical stages in a supply chain, such as transshipments and processing events (see examples of EU, US, and Japan's transshipment declarations in **Annex 3** and examples of EU, US, and Japan's processing statements in **Annex 4**). This can support authorities in both identifying IUU fishing risks and ensuring ICS compliance. If a transshipment takes place there must be details including donor and receiver vessel identity (IMO number or other UVI), date and area of transshipment, species of catch, and estimated weight transshipped. Trade certification for processing events should include the weight before and after each processing event, mass-balance reconciliations, conversion factors, and the identities of exporters, re-exporters, and importers. States can also require reporting of the chain-of-custody of the product.

Trade certificates should include transport details, covering transit between supply chain stages (e.g. bills of lading, freight numbers etc.).[119] Transport details ensure that the full chain of custody for a seafood consignment is documented, traceable, and auditable.[120] Further information on complex supply chain KDEs can be found in the FAO's detailed implementing and understanding catch documentation schemes guide.[121]

We strongly advise that an ICS requires both types of certification (catch and trade certificates) to be linked together. This integrated approach provides a robust framework to ensure product integrity, as it links later stages of the supply chain to the original catch. Through this, authorities can ensure any changes (e.g. in weight) are accounted for and are not due to substitution or mixing with products of IUU fishing.[122]

3.2.3 Certificate validation

An essential component of an ICS is the validation of the different certificates and the data contained within them by the State(s) with jurisdiction over the fishing activities/operations and CTEs (flag, coastal,[123] port, and processing State).[124,125,126] Validation of required documentation is intended to provide a guarantee that the products imported were traced throughout the supply chain and, consequently, verify they were caught in compliance with national and international fishing regulations and conservation and management measures (CMMs).[127] However, it is not a complete guarantee as there may be discrepancies in how validations are conducted by exporting States.[128] Data validation also helps to facilitate accountability when things go wrong.

Flag States hold primary responsibility over the operations of fishing fleets and transport vessels who have authorised and, as such, should validate the relevant certificates when their flagged vessels are involved. Port States on the other hand should validate documentation where landing or transshipment operations have taken place in their ports, as required by the CCAMLR CDS,[129] as well as any transport events. Finally, processing States should validate trade documents where processing and export or re-export is taking place under their jurisdiction.

In the EU's CCS, information on import documents provided by the operators responsible for activities of fishing vessels, processing, and export, or by their representative, must be validated by the competent authority/ies of the flag or processing State.[130]

The US SIMP does not currently require data validation for catch or trade certificate information,[131] but the recent SIMP Action Plan details a pilot programme where partner governments share

catch data in near real time, helping to verify information at the border and during audits.[132] This planned shift by the US demonstrates the value in government-to-government validation of data.

3.2.4 Digitalisation

Import control schemes should be designed as digital systems from the outset, as recommended by the FAO.[133] Simple, secure, user-friendly, accessible digital systems must be a key priority for all management authorities. While States may opt to start with a paper-based system if this is deemed as a more manageable option given their resources and capacity, it is worth noting that paper-based systems, compared with digital, are less efficient, have an increased risk of fraud, and may overwhelm control authorities with the sheer amount of physical documents.[134]

Digital systems come with design and operational efficiencies, lower long-term running costs and improved capabilities such as faster and more comprehensive data analytics, streamlined information exchange, automated risk screening, and machine learning (see **Best practice box 4: Automated risk screening**).[135,136] Electronic systems can also facilitate linkages between supply chain records, enabling automated alarms for anomaly detection, error checking, and easy cross-checking of data, which otherwise in a paper-based system is prohibitively time consuming.[137] As such, for those with the political will, technology, and resources, digital systems are preferable over paper-based systems.

Box 5. Effective existing electronic CDS

RFMOs provide strong models for electronic CDS (e-CDS), for example CCAMLR became fully electronic and mandatory from 2010, with a well-designed and robust database allowing real-time verifications.[138] Any authorised authority can access the e-CDS to cross-check data, improving the detection of illegally-caught toothfish. The CCAMLR's e-CDS is especially effective because of its centralised data repository which enables mass balance checks by tracking the remaining 'available to sell' quantity of a catch certificate.[139] A centralised database with linked catch documentation prevents the overuse of a catch certificate and immediately detects 'double-spend' fraud (see Best practice box 3: Interoperability for more information).[140] In contrast, a paper-based system can only enable mass balance checks for small quantities,[141] so is not conducive for tracking industrial scale imports into large market States.

ICCAT introduced its fully electronic CDS for bluefin tuna (eBCD) in 2012, allowing paper-based format for small-scale fishers where eBCD is not available. ICCAT's system has a functional web-based interface that is easily upgraded;[142] key components for an accessible electronic system.

Best practice box 3: Interoperability

Where a market State opts for developing its own e-CDS or upgrading an existing one to fulfil the needs of a robust ICS, interoperability with existing schemes in other major market States or trade partners should be an integral part of its design. This would enable efficient data and information upload and exchange among domestic and international authorities. Importantly, interoperability can foster more robust traceability of seafood throughout the supply chain by design, as each supply chain actor can more easily engage with the system.[143,144,145]

Interagency coordination can be improved through interoperable electronic systems which can streamline communication and data sharing amongst relevant national authorities and government agencies.

Interoperability is imperative to prevent 'double-spend' fraud—one of the most common forms of fraud for unilateral ICS—where a catch certificate is used to gain entry to either the same market multiple times or to different markets.[146] It occurs because an operator is able to request multiple versions of the same catch certificate (legitimately) to meet any applicable unilateral ICS if they are uncertain of the final destination of their catch. Interoperability can prevent this by facilitating communication and data sharing between different unilateral ICS to detect the use of catch certificate duplicates.[147,148]

Digital systems should be designed with user accessibility in mind, particularly the interface relevant to the fisher or the external party. The latter will need to take into account the wide range of users likely coming from very different socio-economic and linguistic backgrounds who might be using the system under demanding circumstances. As such the system should also be compatible with a wide range of devices and operating systems and with an easy to use and intuitive interface.

Box 6. The EU's CATCH IT system

The EU's CATCH IT system, currently voluntary, digitises the catch certification scheme, enabling electronic data submission and exchange.[149,150] Fully paperless, it is intended to streamline the handling, storage, and management of data while supporting checks, risk screening, verifications, controls, and quantity management. Interoperability with EU border controls should accelerate goods clearance or refusals, and help to validate catch certificates by communicating with partner country authorities.[151] It also intends to facilitate communication of decisions between domestic and international authorities. Use of the system by EU importers and EU Member States will be mandatory from 10 January 2026.[152] Use of CATCH will remain voluntary for non-EU countries.

3.2.5 Simplified documentation for small-scale fishers

Market States should take steps to ensure that strengthening import controls does not inadvertently hinder small-scale or vulnerable fishers.[153] Simplified catch documentation, that requires a smaller set of information, is one way to reduce the potential procedural burden for small-scale operators[154] while also preventing their exclusion from global markets.

The European Commission Regulation 1010/2009,[155] the US SIMP,[156] and the Japan Act on Ensuring the Proper Domestic Distribution and Importation of Aquatic Animals and Plants[157] exempt small-scale vessels from providing vessel specific information, allowing them to aggregate documentation for same day catches from the same collection point. Simplified catch certificates omit unnecessary traceability data such as information about processing, since there are no on-board processing units in small-scale fisheries, and they are not required to submit an IMO number as the vessel would be too small to qualify for a number. The EU's and Japan's simplified catch certificate do not require other information found on the normal catch certificate, such as preservation method, first landing, transport, and additional authorisations, and omits complex tracking fields (see Table 2 for a direct comparison between the EU's catch certificate and simplified version; see Annex 5 for simplified catch certificate examples by the EU, US, and Japan).[158] These adjustments help to relieve some of the procedural burden on small-scale and artisanal fishers,[159] whilst still applying effective means to prevent IUU fishing operations.

In the absence of a national or international definition of small-scale fisheries, criteria should be laid down to determine the beneficiaries of simplified documentation. Example criteria used by the EU includes vessels with an overall length of less than 12 metres without towed gear; or with an overall length of less than 8 metres with towed gear; or without a superstructure; or of less than 20 GT.[160]

Table 2. Example of the EU's CC requirements compared to the simplified CC.

Differing requirements have been highlighted.

	Key data element	EU Catch Certificate	Simplified Catch Certificate[161]
Who	Vessel name	Required	Required
	Unique vessel identifier (IMO number)	**From 10.1.2026**	**Not required**
	Vessel flag	Required	Required
	International Radio Call Sign (IRCS)	**Required**	**Not required**
	Information on exporter / re-exporter	Required	Required
	Identity of import company	Required	Required
What	Product type	Required	Required
	Species name – ASFIS 3-Alpha Code	Required	Required
	Estimated live weight (kg)	Required	Required
	Processed weight (kg)	**Required**	**Not required**
	Transshipment: Declaration and authorisation of transshipment at sea, IMO number and vessel master information	**Required**	**Not required**
When	Event date	Required	Required
Where	Catch area (defined with a clear distinction between the EEZ and the high seas)	Required from 10.1.2026	Required
	Authorisation to fish	Required	Not required
	Port of landing	Not Required	Not required
	Processing location	**Required**	**Not required**
How	**Fishing gear type or catch method**	**Required from 10.1.2026**	**Not required**

3.2.6 Mutual recognition of catch documentation

To facilitate effective implementation and ease potential administrative challenges for the authorities who are reviewing catch documentation, we recommend that importing States recognise catch documentation from other States or RFMOs if it meets their KDE requirements or is evaluated as at least on par with their national scheme. For example, Japan accepts the EU catch certificate and is able to exchange some data from catch documentation, including KDEs and CTEs.[162] **Data exchange through mutual recognition helps to prevent the fraudulent multiple uses of a catch certificate intended for a single consignment; a common form of fraud that re-uses a previously legitimate catch certificate for an illegitimate catch** (see **best practice box 3: Interoperability** for more information on double-spend fraud). Australia's CDS proposal considers the recognition of catch certificates issued by the EU, Japan, and US.[163] Further, recognising the catch certificates of other market States will relieve exporters of heavier administrative requirements, as they can use internationally recognised catch certificates for their catches if they are exporting to multiple market States.

3.3 Implementation strategies

© EJF

3.3.1 Prior notice

Catch documentation should be submitted to the competent authority of the market State with prior notice to its arrival at the market State's border, allowing authorities adequate time to screen and flag high-risk shipments. For example, the Article 16 of the EU Regulation 1005/2008[164] outlines that the importer shall submit the catch documentation three working days before the estimated time of arrival of the consignment. **Prior notice allows enforcement authorities time to ensure compliance before a product is released onto the market.** There is discretion to adapt this dependent on the type of fishery and the distance and mode of transport taken to deliver the consignment. We recommend that States require this proactive approach of their exporters, to prevent products linked to IUU fishing from entering their markets unnoticed.

3.3.2 Risk assessment

Risk assessment is essential to a robust ICS to focus enforcement efforts.[165] In 2023, the EU received 196,078 catch certificates in total.[166] It would be inefficient to undergo detailed verifications and inspections for every consignment accompanying the catch certificates at this large scale. Risk criteria is critical to target consignments that require further investigation to ensure they are compliant and not products of IUU fishing. **Risk assessments therefore improve operational efficiency and enable limited Government resources to be directed at ensuring compliance for products of questionable origin.**

Risk criteria should be regularly updated to ensure emerging threats are addressed. Key risk criteria include:

- Vessels listed as IUU and/or vessels and vessel owners previously linked to IUU fishing
- Vessels with a history of name, registration number, or flag changes
- Vessels using a flag of convenience (FOC), that is one with weak oversight, monitoring, control, enforcement and compliance behaviour
- Flag States carded by the EU[167] and/or identified by NOAA Fisheries' biennial report to Congress[168]
- Flag States that have not ratified or have not effectively implemented international agreements, e.g. the FAO Port State Measures Agreement (PSMA),[169] the IMO 2012 Cape Town Agreement,[170] the ILO C188 Work in Fishing Convention,[171] the United Nations Fish Stocks Agreement,[172] and the United Nations Convention on the Law of the Sea,[173] or have not adopted National Plans of Action for Combating IUU Fishing (NPOA-IUU)[174]
    - States should take other international instruments into account, such as the Standard of Training, Certification and Watchkeeping for Fishing Vessel Personnel,[175] and the International Plan of Action to Prevent, Deter and Eliminate IUU Fishing[176]
- Newly and/or distinct trading patterns, e.g. a significant and sudden increase in trade volume of a given species
- Discrepancies in reported traceability/supply chain information (i.e. reporting catch of a species in a location it doesn't occur, or during a time when the fishery is closed, or with a gear type that is not compatible, etc). The EU's criteria for verifications provides additional risk criteria for States to consider implementing (see **Box 7**).

In addition to high-risk criteria, market States can consider criteria that demonstrate IUU fishing risk has been better managed, for example if a flag State has mandated electronic monitoring (EM) across its industrial fleet their validation of catch data is robust.

Box 7. Example: EU criteria for verifications related to catch certificates according to Commission Regulation (EC) No 1010/2009[177]

a. alerts triggered in CATCH;

b. information shared by Mutual Assistance messages in accordance with Article 51 of Regulation (EC) No 1005/2008 and Title IV of this Regulation;

c. products obtained from species subject to quota under a regional fisheries management organisation;

d. country notified of the possibility of being identified as non-cooperating third country in accordance with Article 32 of Regulation (EC) No 1005/2008;

e. vessel, vessel owner or operator suspected of being or having been involved in IUU fishing activities;

f. vessel, vessel owner or operator having been involved in illegal activities other than IUU fishing but constituting a potential risk in respect of IUU fishing;

g. vessel having recently changed its name, flag or registration number;

h. fishery products obtained from species of high commercial value;

i. introduction of new kinds of fishery products, new product presentations, or new trade patterns;

j. inconsistencies between the trade patterns and the known fishing activities of a flag State in particular in respect of species, volumes or characteristics of its fishing fleet;

k. inconsistencies between the trade patterns and the known fishing-related activities of a third country in particular in respect of the characteristics of its processing industry or its trade in fishery products;

l. trade patterns not justified in terms of economic rationality or logic;

m. significant and sudden increase in trade volume for a certain species;

n. catch certificate submitted in relation to several consignments;

o. generation, validation and submission of paper-based catch certificates or endorsement of paper-based processing statements;

p. inconsistencies between data submitted in CATCH by the operator and data contained in the paper-based catch certificates, or any other related paper-based documents, or any other relevant information available to the competent authority;

q. use of box 6 of the catch certificate as laid down in Annex II of Regulation (EC) No 1005/2008;

r. use of box 7 of the catch certificate as laid down in Annex II of Regulation (EC) No 1005/2008 in case of transhipments;

s. submission of catch certificates accompanied by multiple transport details as foreseen in the Appendix to Annex II of Regulation (EC) No 1005/2008 and/or documents foreseen under Article 14(1) of the same Regulation;

t. product from a new flag State or from a new exporting State;

u. newly established operator.'

Best practice box 4: Automated risk screening

Digital systems and analytical technologies, such as artificial intelligence, can streamline risk screening through automation, machine learning, and predictive analytics.[178] For example, the US Food and Drug Administration's (FDA) Predictive Risk-Based Evaluation for Dynamic Import Compliance Targeting (PREDICT) tool uses data mining and machine learning to create risk scores which determine inspection targets.[179] We advise States to adopt and implement automated risk screening tools to enhance the system's overall effectiveness, better target resources and capacity for enforcement, and reduce administrative burdens.

3.3.3 Catch documentation verification

Imports flagged as high-risk or with questionable documentation—as identified by the acting authorities—can be verified by the authorities of countries with jurisdiction over the catch: the vessel's flag, coastal, port, and processing State as well as independently by the market State authorities. **External verifications are a useful tool for cross-referencing information supplied by exporters to ensure product legality.** This approach is adopted by the EU, detailed in Article 17 of the EU's IUU Regulation[180] and one that we recommend other market States replicate. Further, annual transparent reporting by authorities on verification and enforcement activities allow governments, stakeholders, and civil society to monitor performance and implementation.

3.3.4 Physical inspections of import consignments

High-risk consignments should undergo physical inspection to ensure that what an exporter or importer is reporting in the catch documentation (catch and trade certificates) match what is actually being imported. For this to be effective, **States must allocate sufficient resources and human capacity to meet inspection requirements.** We advise that market States perform physical inspections of all import consignments flagged as high-risk using the risk assessment criteria outlined in **section 3.3.2** above, or in cases where there are any doubts as to the validity of the information contained within the catch documentation, as well as cases where mass balance anomalies have been detected, i.e. the overuse of a single catch certificate.[181] It is thus important that a unilateral ICS is designed from the outset with these capabilities and operational procedures in mind, involving the authorities in charge of physical inspections at the points of entry.

> High-risk consignments should undergo physical inspection to ensure that what an exporter or importer is reporting in the catch documentation (catch and trade certificates) match what is actually being imported.

Box 8. Physical inspections conducted by EU Member States of direct landings

The EU IUU Regulation mandates a minimum inspection ratio of 5% of direct landing operations by non-EU vessels—to note the EU does not have a minimum requirement for physical inspections of imported consignments.[182] A direct landing is a direct importation of seafood products from a fishing vessel into a State's port.[183] **Of the 10 EU Member States who met or exceeded the 5% inspection target, seven found at least one infringement within the 2018/19 reporting period,[184] highlighting the effectiveness of direct landing inspections in uncovering IUU fishing or other fraudulent activities.** This evidence shows the importance of physical inspections of risky consignments, thus we recommend that market States should set a minimum requirement for the number of import consignments inspected.

3.3.5 Holding of imported products

In the case where a market State's competent authorities' doubts in the validity of information in catch documentation, the product's legality, and/or compliance of the products with CMMs, **the authorities need to have provisions to appropriately hold the consignment for further investigation, taking into consideration its perishable nature.** In the US, the Customs and Border Protection will withhold release of shipments that are suspected to be produced by forced labour.[185] Within three months after receiving the notification of its detention, importers have to either prove the shipment was produced without forced labour, or export or destroy the goods.[186]

We recommend that States ensure there are provisions in place for their authorities to hold consignments as needed to confirm the product's validity, legality, and compliance.

3.3.6 Refused entry protocol

States should also establish a protocol to deny entry of a product when IUU fishing imports are identified or when authorities have reasonable grounds to believe so. States should use the relevant provisions to, among other things, close their ports to IUU fishing vessels and notify other relevant parties if they are party to the PSMA or members of an RFMO with port State measures covering the imported species. **In any case, authorities should refuse entry of products linked to IUU fishing and, if confiscated, dispose of them appropriately.** For example, Article 18 of the EU IUU Regulation[187] states that "Member States may confiscate and destroy, dispose of, or sell such [IUU] fishery products in accordance with national law. The profits from the sale may be used for charitable purposes."

Importers of fishery products connected to IUU fishing should face effective, proportionate, and dissuasive sanctioning based on the value of the products and severity of the offense. Sanctions should also consider any other identified infringements, such as on workers or inspectors. Repeat offenders (operators, vessel owners, business owners, and beneficial owners) should face escalating penalties as a deterrent. For example, Article 44 of the EU IUU Regulation recommends a maximum infringement increasing from five times the value of the consignment to eight times its value for repeat offenders.[188] From January 2026, Article 91a of the Fisheries Control Regulation (Regulation 2023/2842) will replace Article 44 of the EU IUU Regulation and can then be referred to as model legislation.[189] Whilst most apply administrative sanctions, authorities could also consider criminal charges depending on the nature and severity of the offence.

Incidents of refused entry should be shared with other flag, coastal, port, and market States' authorities to prevent offenders from accessing alternative markets and inform their risk assessment. **Transparency in refusals and sanctions deters future infringements, aids accountability, demonstrates the system's efficiency, and allows for the exchange of best practices between competent authorities.**

3.4 Capacity building for better governance

© Envato Stock

3.4.1 Sufficient capacity and resources to implement

Governments must invest in infrastructure, staffing, and training to effectively enforce import controls. Capacity building and comprehensive training should equip all relevant stakeholders—including fisheries authorities, border controls, maritime security, judicial branches, industry partners, export partners, validating and verifying overseas authorities as needed—with the knowledge to operate the system effectively and ensure buy-in for empowered implementation and compliance. For example, Spain's investment in full-time and around the clock fisheries officials has been reflected in a greater number of verifications, inspections, and rejections performed.[190]

3.4.2 Interagency cooperation

Interagency cooperation is crucial to address the multifaceted challenges of IUU fishing.[191] It is key that at the point of conception, responsible agencies for both implementation and enforcement of the ICS are determined and that information sharing between all relevant agencies is facilitated. The most effective unilateral ICS implementation is collaborative, demonstrated by Spain from the Ministry of Agriculture, Food, and the Environment and the Spanish customs agency collaboration on CDS enforcement for fisheries imports.[192] Relevant authorities that may be involved include fisheries departments, border controls, maritime security, coast guard, trade and labour departments, and authorities for human rights and justice, and should at minimum

enter into cooperation and data sharing agreements or memoranda of understanding. The relevant authorities will vary by country.

Best practice box 6: Interagency working group

As a best practice, we advise that market States establish an interagency working group focused on IUU fishing, as this will help to identify barriers, enhance data sharing,[193] and explore new opportunities for better collaboration.[194] For an example of an interagency working group established for tackling IUU Fishing, refer to the US Interagency Working Group on IUU Fishing which brings together 21 agencies for an integrated, federal government-wide response to IUU fishing globally.[195]

3.4.3 Encouraging best practice in exporting States

Under international law, flag States are responsible for regulating and monitoring the activity of the fishing vessels registered to their country,[196] and therefore play a significant role in helping to stop IUU fishing. However, not all flag States have the resources, capacity, or political will to enforce strict MCS measures on their fleet. While MCS constraints can be a barrier, other structural challenges—such as corruption or inadequate legal frameworks—may also contribute to ineffective flag State governance.

Market States with sufficient resources can offer direct support to States with limited technical and/or financial resources for effective fisheries management, to build the flag State's capacity to detect and combat IUU fishing. Strengthening MCS measures, including by use of tools like vessel monitoring system (VMS), AIS, and EM, will also improve catch certificate verification, aiding compliance across the supply chain. Further, it is important that market States also encourage and support best practice to prevent IUU fishing that is tailored to the different roles that coastal, port, and processing States play in the supply chain. For processing States in particular, establishing and maintaining robust national traceability frameworks is essential to ensure catch documentation integrity by using invoices and documentation to track the consignment from entry to exit of the processing State. This auditable trail helps to prevent any IUU fish from being laundered.[197]

> It is important that market States also encourage and support best practice to prevent IUU fishing that is tailored to the different roles that coastal, port, and processing States play in the supply chain.

It is important to note that by implementing an ICS, market States send a strong message to exporting States that IUU fishing is a real threat and market access now depends on supply chain traceability to help prevent it.[198]

Best practice box 7: Best practice to promote in exporting States

A. The Global Charter for Fisheries Transparency

Market States could encourage flag, coastal, and port States to implement the principles of the Global Charter for Fisheries Transparency (see **Annex 6** for the full list of the Global Charter for Fisheries Transparency principles).[199] These principles encourage States to promote sustainable fisheries management, protect fish stocks and marine biodiversity, and cultivate equity in the fishing sector, whilst eliminating IUU fishing in their fleets.[200] The implementation of these principles may look different for each State, as not all States have the immediate capacity to fulfil each principle.

B. Electronic monitoring (EM)

We emphasise that not all flag States will have the capacity to implement EM and other technologically-based grievance mechanisms, even with the support of market States. Still, market States, alongside industry-focused initiatives,[201] could support the establishment of EM programmes for flag State industrial fleets, coupled with CCTV and/or other sensors onboard vessels, as an efficient and cost effective tool to monitor, inspect and verify catches on board whilst ensuring that no IUU fishing activities are happening.[202] Further, support can be given to establish grievance mechanisms, such as WiFi onboard vessels, which improves crew's living conditions and facilitates regular communication with those outside the vessel.

C. Beneficial ownership

Seafood supply chains are often notoriously opaque with complex corporate structure involving different jurisdictions and the ability to register vessels in a country where the owner is not a citizen or resident. This complexity makes the fisheries sector particularly vulnerable to the negative impacts of beneficial ownership secrecy. Beneficial ownership refers to an individual or group with financial or legal stake in a company or fishing vessel.[203] These owners may not be the vessel's registered owner and can avoid detection due to the lack of national or international requirements on transparency of beneficial owners. Concealed beneficial owners can maintain access to fisheries, ports of landing, and markets for processing and sale, without being held responsible for any illegality they engage in or enable.

Few flag States mandate data collection of this information, and those that do, such as the UK,[204] lack details of individual fishing vessels and do not verify the data collected. Establishing registries of the ultimate beneficial owners of businesses and fishing vessels, and verifying that information is a key step needed to increase fisheries transparency.

Market States have an interest in beneficial ownership transparency as it can better inform their risk analysis to prevent the entry of products of IUU fishing, as well as deterring illicit activities by informing enforcement actions for repeat offenders.

Best practice box 8: The EU's trade restrictive measures in combination with the CCS

The EU's IUU Regulation combines its unilateral ICS with trade restrictive measures (TREMs) through the establishment of the 'carding scheme'. However, it should be noted that TREMs are not part of an ICS or CDS, but are a completely different tool that market States can use in the global fight against IUU fishing, hence why the inclusion of TREMs is minimal in this Handbook.

The EU's 'carding scheme' exemplifies how market States can use TREMs to incentivise governance improvements in exporting flag States by issuing warnings ('yellow cards') or trade sanctions ('red cards') and, importantly, offering support in the form of technical guidance and capacity building to address these shortcomings.[205,206] The EU has driven demonstrable reforms in fisheries governance in flag States including Belize, Guinea, Solomon Islands, and Thailand.[207,208] Market States with sufficient resources can introduce their own legal mechanism that uses similar strategies to the carding scheme. This may include monitoring flag States' counter-IUU fishing measures, offering support to address identified shortcomings, identifying non-cooperating States and denying market access to States that fail to address these identified shortcomings. If this approach is pursued, necessary legislation is required to allow the market State to prohibit imports from the countries identified.[209]

Forming partnerships with other market States for the mutual recognition of non-cooperating flag States is a recommended alternative for flag States that lack the capacity required to sustain extended bilateral dialogues with multiple trading partners. As above, States would need to establish new or amend existing legislation to allow for the mutual recognition of non-cooperating flag States identified by partner States.

The EU's carding scheme remains a world-leading example of how market States can drive meaningful governance reforms in flag States to combat IUU fishing through TREMs. While it requires coordination, capacity and sustained political engagement, it also demonstrates that such strategies are both achievable and impactful when properly resourced and prioritised. Major market States—particularly those with substantial capacity like the EU, US, and Japan—are well-positioned to implement similar mechanisms alongside their ICS. The key challenge lies in assisting other States in strengthening measures to tackle IUU fishing and mobilising the necessary political will and institutional commitment to establish and maintain such tools as part of a robust and cooperative global response to IUU fishing.

4

Guidelines: Assessment of proposed system

Following the policy proposals of a draft ICS—integrating the guidelines outlined in section 3—the subsequent processes should be followed.

4.1 Socio-economic analysis

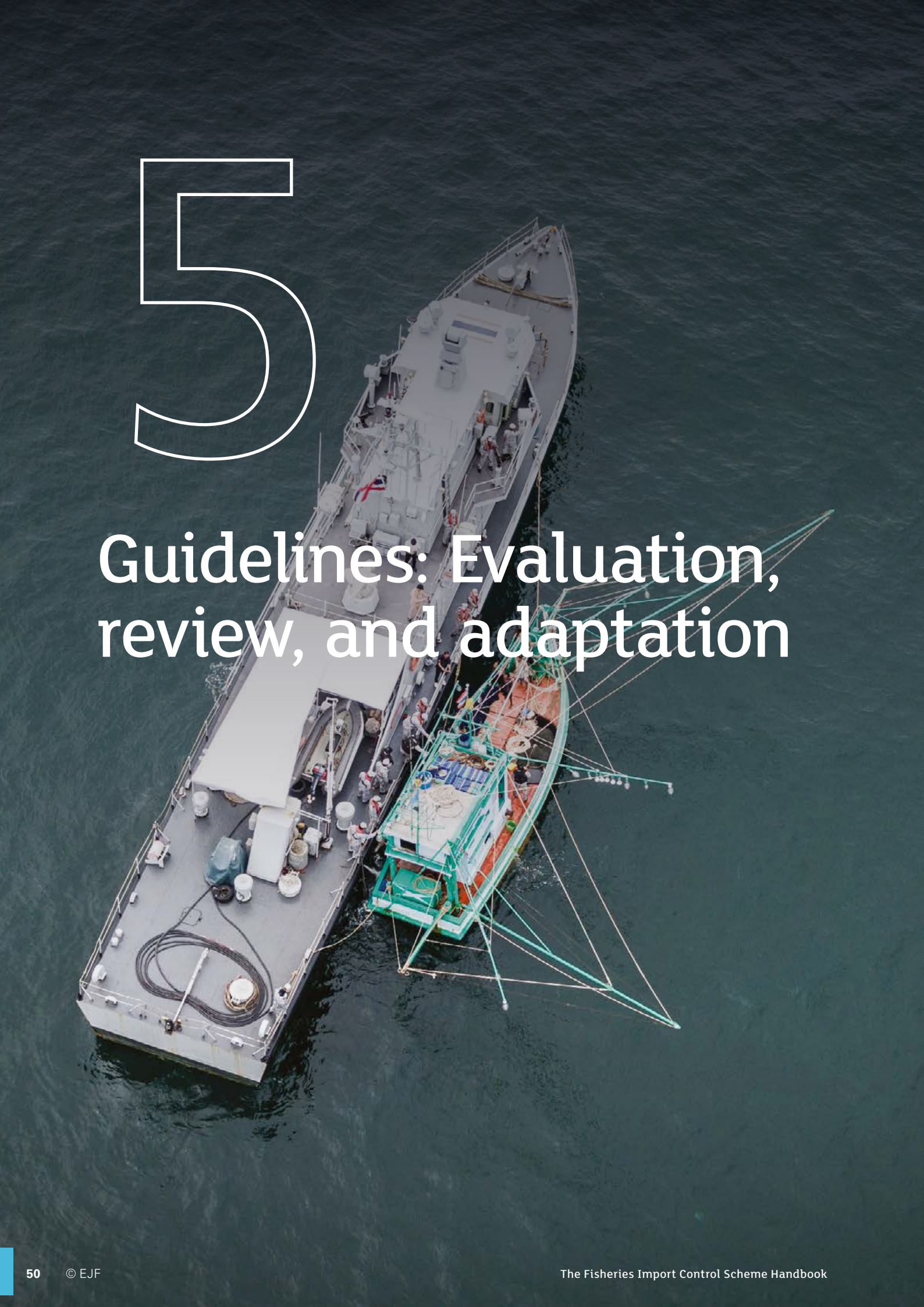
A socio-economic analysis that identifies the benefits to stakeholders can be helpful to justify the existence of a programme once the ICS has been drafted.[210] Potential areas to focus on include the impact of the removal of imports derived from IUU fishing from the market on domestic industry, market integrity, consumers, biosecurity, sustainability, economic equity, enforcement, and reputation. **Evaluating these factors helps identify potential economic and social impacts, ensuring that benefits, including non-monetary ones, outweigh investments or potential disruptions**. This analysis would also support long-term resilience by ensuring that enforcement mechanisms are cost-effective and that the scheme does not inadvertently disadvantage domestic importers.

4.2 Stakeholder consultation

Authorities should engage with a wide range of relevant stakeholders. These should include the catching and harvesting sector (both large and small scale), seafood sourcers and retailers, customs brokers, civil society, local and Indigenous groups, academics, international trade and other partners etc.

A conscious effort should be made to accommodate and facilitate stakeholder participation including any potential special circumstances for some of these groups. Besides online consultation(s), we also recommend site visits, particularly when it comes to small-scale fishers and Indigenous groups, adequate timeframes and flexibility in receiving feedback in multiple languages and formats, including orally. Advanced notice to stakeholders of the consultation process should be made, including targeted outreach to relevant stakeholders via appropriate channels.

The stakeholder consultation process fosters transparency, trust, local ownership, and support for the scheme, while incorporating valuable real-world insights and best practices from other jurisdictions. For instance, Australia's recent ICS proposal included a dedicated stakeholder feedback period that was open to interested parties.[211] **Regular stakeholder consultation is an essential step in the establishment of an ICS to ensure its effectiveness.**



5 Guidelines: Evaluation, review, and adaptation

Following the steps outlined in section 4 and once the ICS is established in national legislation, evaluation, review, and adaptation are necessary to assess its efficacy and to identify areas for improvement.

5.1 Performance monitoring and transparency

States should closely monitor ICS implementation to assess its efficacy in achieving its main objective and identify areas for improvement. For example, EU Member States have to provide the European Commission with a biennial report which details how authorities are implementing the EU IUU Regulation in the preceding two years.[212] The Member State biennial reports are not made publicly accessible by Member States or the European Commission, but have been obtained and published by the EU IUU Fishing Coalition via access to information requests.[213] The US also has to produce a biennial report to Congress on SIMP efficacy.[214]

We suggest a report format that provides enough detail for central governments, stakeholders, and civil society to assess the overall performance of the ICS. Reports should detail the number of catch certificates received, validations received, verifications requested, inspections conducted, rejections and what happened to the consignment, and any sanctions applied, including the partner States and vessels involved. It is important that the reporting template is clear and simple, and that implementing authorities who complete the reporting are trained and fully understand the reporting requirements. Occasionally, the EU's biennial reporting template led to confusion and misinterpretations by Member State authorities completing it, undermining the opportunity for implementation monitoring and improvements during those years.[215]

We strongly encourage States to publish their performance monitoring reports either in their entirety, if appropriate, or in an aggregated or summarised form so that they are easily accessible to stakeholders and other interested parties such as other States who have or are contemplating similar ICS. Transparency on the performance of an ICS enables the sharing of best practices and lessons learned, as well as better informing stakeholders and flagging bad actors involved in IUU fishing.[216] Sharing this information in aggregate form also promotes more responsible procurement and sourcing by the private sector.

5.2 Reviews

The ICS should be reviewed regularly. We recommend a review every two years when first implemented, to identify and rectify any initial complications, followed by reviews every three or four years once the system is well established. These regular reviews should look at the functionality of the system itself and whether it is achieving its objectives, as well as identifying any areas for improvement or where there may be potential gaps in the scheme.[217] These may include, for example, updating the risk assessment criteria and training materials, further harmonisation with new/updated ICS in other jurisdictions, exploring and integrating technological advancements to improve implementation and efficiencies, such as artificial intelligence or genomic technologies to detect seafood fraud,[218] and incorporating feedback from users and stakeholder groups, both domestic and overseas. In parallel, these reviews should also look into the changing trends or how consumer habits affect the volume and species of imported seafood, changes in the type of imports (e.g. unprocessed vs processed), and the latest developments in the conservation status of these species.

Japan has incorporated reviews every two years in their ICS, to review technical aspects of the scheme and expand the species coverage.[219] In the most recent review of Japan's scheme, blue shark and shortfin mako shark were identified as candidate species for the first round of the ICS species-coverage expansion, alongside the expansion of the domestic CDS to include Pacific bluefin tuna from April 2026.[220] Alternatively, Australia is proposing to review their system three years after implementation.[221] **Reviews should include all relevant authorities, stakeholders, and partners to both identify and overcome on-the-ground implementation challenges and streamline enforcement.** It is key that review recommendations are acted upon.

We also recommend government-to-government consultations and presenting at global conferences or meetings, such as the UN FAO Committee on Fisheries (COFI), to share best practices and lessons learned and to better align ICS globally.

5.3 Ongoing stakeholder engagement

Continuous engagement with a wide range of stakeholders (e.g. fishers, retailers, civil society organisations, local and Indigenous groups, academics, etc.), including other State agencies involved in the implementation of an ICS is critical throughout the planning, implementation, monitoring, and review stages. **Informed and engaged stakeholders contribute to a more equitable and effective scheme, foster cooperation and buy-in, and improve compliance.**

NOAA's recent review of US SIMP gathered feedback from over 7,000 stakeholders over the course of a year.[222] We strongly encourage governments to engage as many stakeholders as possible throughout each stage of establishing an ICS and onwards.

Annexes

Annex 1 – Methods

This Handbook was informed by a literature review encompassing consultations, evaluations of existing ICS, government reports on the development of new import controls, and peer-reviewed research analysing their effectiveness. We found literature through targeted searches for specific sections. We aimed to ensure the literature review was thorough and grounded in both policy and academic literature.

This Handbook draws on key reports and articles including:

- Design options for the development of tuna catch documentation schemes – Hosch, FAO (2016)[223]
- Voluntary Guidelines for Catch Documentation Schemes – FAO (2017)[224]
- A comparative study of key data elements in import control schemes aimed at tackling illegal, unreported and unregulated fishing in the top three seafood markets: the European Union, the United States and Japan – EU IUU Fishing Coalition (2020)[225]
- Understanding and implementing catch documentation schemes – A guide for national authorities – FAO (2022)[226]
- Water-tight? Assessing the effectiveness of EU controls to prevent illegal seafood imports – EU IUU Fishing Coalition (2022)[227]
- Measures to prevent the importation of illegal, unreported and unregulated seafood: draft report – Department of Agriculture, Fisheries and Forestry (2023)[228]
- Traceability, Targeting, and Transparency in U.S. Seafood Trade Programming – The Stimson Center (2023)[229]
- Advancing the Crucial Notion of "Interoperability" in Catch Documentation Schemes – Hosch & Clarke (2025)[230]
- A New Seafood Import Policy for Nations to Combat Illegal Fishing – Roberson et al. (2025)[231]

Legislation that informed this report:

- EU – Council Regulation (EC) No 1005/2008 of 29 September 2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing, amending Regulations (EEC) No 2847/93, (EC) No 1936/2001 and (EC) No 601/2004 and repealing Regulations (EC) No 1093/94 and (EC) No 1447/1999. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02008R1005-20240109.
- Commission Regulation (EC) No 1010/2009 of 22 October 2009 laying down detailed 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. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02009R1010-20200327.
- EU – Council Regulation (EC) No 1224/2009 of 20 November 2009 establishing a Community control system for ensuring compliance with the rules of the common fisheries policy, amending Regulations (EC) No 847/96, (EC) No 2371/2002, (EC) No 811/2004, (EC) No 768/2005, (EC) No 2115/2005, (EC) No 2166/2005, (EC) No 388/2006, (EC) No 509/2007, (EC) No 676/2007, (EC) No 1098/2007, (EC) No 1300/2008, (EC) No 1342/2008 and repealing

Regulations (EEC) No 2847/93, (EC) No 1627/94 and (EC) No 1966/2006. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02009R1224-20241011.

- US – Magnuson-Stevens Fishery Conservation and Management Act: Seafood Import Monitoring Program. https://www.regulations.gov/document/NOAA-NMFS-2022-0119-0001.
- US – Tariff Act, Section 307 (amended Section 1307 Convict-made goods; importation prohibited). https://www.congress.gov/crs-product/IF11360.
- Japan – Act on Ensuring the Proper Domestic Distribution and Importation of Specified Aquatic Animals and Plants. Further information is available at: https://www.jfa.maff.go.jp/220614.html.
- Japan – Foreign Exchange and Foreign Trade Act. Further information available here: https://www.japaneselawtranslation.go.jp/en/laws/view/4412
- Japan – Act Partially Amending the Fishery Act and the Act on Ensuring the Proper Domestic Distribution and Importation of Specified Aquatic Animals and Plants. Very brief outline of the act (i.e., the amendments of existing acts) available here: https://www.japaneselawtranslation.go.jp/outline/130/905R632.pdf

Annex 2 – Catch certificate examples

1. EU catch certificate, as detailed in Annex II to Regulation (EU) 2023/2842 of the European Parliament and of the Council of 22 November 2023 amending Council Regulation (EC) No 1224/2009, and amending Council Regulations (EC) No 1967/2006 and (EC) No 1005/2008 and Regulations (EU) 2016/1139, (EU) 2017/2403 and (EU) 2019/473 of the European Parliament and of the Council as regards fisheries control.[232]

<table>
<tr><td colspan="8">(i) EUROPEAN UNION CATCH CERTIFICATE</td></tr>
<tr><td colspan="3">Document number</td><td colspan="5">Validating authority</td></tr>
<tr><td colspan="2">1. Name</td><td colspan="3">Address</td><td colspan="3">Telephone
Fax</td></tr>
<tr><td colspan="2">2. Fishing vessel name</td><td colspan="3">Flag – home port and registration number</td><td>Call sign</td><td colspan="2">IMO number of, if not applicable, other unique vessel identifier (if applicable)</td></tr>
<tr><td colspan="2">Fishing licence no – valid until</td><td colspan="6">Mobile satellite service no Telefax no Telephone no Email address (if issued)</td></tr>
<tr><td colspan="2">Fishing gear (1)</td><td colspan="6"></td></tr>
<tr><td colspan="2">3. Description of product</td><td colspan="3">Type of processing authorised on board</td><td colspan="3">4. References to applicable conservation and management measures</td></tr>
<tr><td>Species</td><td>Product code</td><td>Catch area(s) and catch date(s) (from – to) (2)</td><td>Estimated weight to be landed in kg</td><td>Net catch weight in kg</td><td colspan="3">Verified weight landed (net catch weight in kg) (3)</td></tr>
<tr><td></td><td></td><td></td><td></td><td></td><td colspan="3"></td></tr>
<tr><td colspan="8">5. Name of master of fishing vessel or of fishing licence holder – Signature</td></tr>
<tr><td colspan="3">6. Declaration of transshipment at sea
Name of master of fishing vessel</td><td>Signature and date</td><td colspan="2">Transshipment date/area/position</td><td colspan="2">Estimated weight (kg)</td></tr>
<tr><td colspan="2">Master of receiving vessel</td><td>Signature</td><td colspan="2">Vessel name</td><td>Call sign</td><td colspan="2">IMO number or, if not applicable, other unique vessel identifier (if applicable)</td></tr>
<tr><td colspan="8">7. Transshipment and/or landing authorisation within a port area:</td></tr>
<tr><td rowspan="3">Name</td><td rowspan="3">Authority</td><td rowspan="3">Signature</td><td rowspan="3">Address</td><td rowspan="3">Telephone</td><td>Port of landing (as appropriate)</td><td>Date of landing (as appropriate)</td><td colspan="2">Seal (stamp)</td></tr>
<tr><td>Port of transshipment (as appropriate)</td><td>Date of transshipment (as appropriate)</td><td>Name and registration number of receiving vessel</td><td>Seal (stamp)</td></tr>
<tr><td colspan="2"></td><td>IMO number or, if not applicable, other unique vessel identifier (if applicable) of receiving vessel</td><td></td></tr>
<tr><td colspan="2">8. Name and address of exporter</td><td colspan="2">Signature</td><td colspan="2">Date</td><td colspan="2">Seal</td></tr>
<tr><td colspan="8">9. Flag State authority validation:</td></tr>
<tr><td colspan="2">Name/Title</td><td colspan="2">Signature</td><td>Date</td><td colspan="3">Seal (stamp)</td></tr>
<tr><td colspan="8">10. Transport details: See Appendix</td></tr>
</table>

11. Importer declaration:				
Company, name, address, EORI (4) number and contact details of importer (specify details)	Signature	Date	Seal	
Company, name, address, EORI (4) number and contact details of representative of the importer (specify details)	Signature	Date	Seal	
Product description	CN code		Net weight in kg	Net fishery product weight in kg
Document under Article 14(1) of Regulation (EC) No 1005/2008	Yes / no (as appropriate)	References		
Document under Article 14(2) of Regulation (EC) No 1005/2008	Yes / no (as appropriate)	References (processing statement document number(s))		
Member State and office of import				
Means of transport upon arrival (airplane, vehicle, ship, train)	Transport document reference	Estimated time of arrival (if submission under Article 12(1) of Regulation (EC) No 1005/2008)		
Customs declaration number (if issued)	CHED(5) number (if applicable)			

12. Import control: Authority	Place	Importation authorised(6)	Importation suspended(6)	Verification requested – date

13. Refusal of catch certificate	Catch certificate refused on the basis of the following provisions of Regulation (EC) No 1005/2008:	(6)
	Article 18(1), point (a)	
	Article 18(1), point (b)	
	Article 18(1), point (c)	
	Article 18(1), point (d)	
	Article 18(1), point (e)	
	Article 18(1), point (f)	
	Article 18(1), point (g)	
	Article 18(2), point (a)	
	Article 18(2), point (b)	
	Article 18(2), point (c)	
	Article 18(2), point (d)	

(1) Code to be used in accordance with International standard statistical classification of fishing gear.

(2) Catch area:
- FAO area(s);
- exclusive economic zone(s) and/or high seas; and
- relevant regional fisheries management organisation convention area(s).

(3) To be filled in only if verified in the context of an official inspection,

(4) Economic Operators Registration and Identification.

(5) Common Health Entry Document.

(6) Tick as appropriate.

2. US SIMP model catch certificate as outlined by NOAA.[233]

Model Catch Certificate for Traceability – Harvest and Landing/Receipt		
(1) Unique Catch or Production Document Identifier*		( ) Wild Capture Fishery (Complete Section 2) ( ) Farm Raised (Complete Section 3)
(2) Complete this section for wild capture fish products		
Flag State of vessel	Name of Harvesting Vessel**	Vessel Registration or Documentation Number**
Fishing Permit Number**	Fishing/Catch Area:	Fishing Gear:
(3) Complete this section for farm raised fish products		
State of jurisdiction:	Facility Licence of Authorization**	Name and Location of Aquaculture Facility**
(4) Complete this section for receipt of fish products		
Name of Recipient, Processor or Buyer	Telephone: Email:	Business Address
Receiving Facility or Vessel	Date of Landing/Transshipment	Landing Port or Delivery Location
Species of Fish (ASFIS 3 alpha code) 1. _____ 2. _____ 3. _____ 4. _____ 5. _____	Landed or Delivered Weight 1. _____ ( )lb or ( )kg 2. _____ ( )lb or ( )kg. 3. _____ ( )lb or ( )kg 4. _____ ( )lb or ( )kg 5. _____ ( )lb or ( )kg	Product Form 1. _____ 2. _____ 3. _____ 4. _____ 5. _____

*Note: Unique Document Identifier is provided by the harvester or landing recipient or competent authority.
**Not required if completing an aggregated catch certificate for small-scale vessels or aquaculture facilities.

3. Japan's Catch Certificate as outlined in Attachment 7 for Class II Aquatic Animals and Plants under Article 11 of Act on Ensuring the Proper Domestic Distribution and Importation of Specified Aquatic Animals and Plants[234]

Catch Certificate for Class II Aquatic Animals and Plants under Article 11 of Act on Ensuring the Proper Domestic Distribution and Importation of Specified Aquatic Animals and Plants

<table>
<tr><td colspan="6">(a) Validating authority</td></tr>
<tr><td colspan="3">Document number:</td><td colspan="3">Name of validating authority</td></tr>
<tr><td colspan="2">Name and title of official:</td><td colspan="2">Address of the authority:</td><td colspan="2">Tel/Fax</td></tr>
<tr><td colspan="6">(b) Fishing vessel information</td></tr>
<tr><td>Fishing vessel name:</td><td colspan="2">Flag – Home port and registration number:</td><td>Call sign:</td><td colspan="2">IMO/Lloyd's number / Unique Vessel Identifier (if issued):</td></tr>
<tr><td colspan="3">Fishing licence No – Valid to</td><td colspan="3">Inmarsat No/Fax No/Telephone No/E-mail address (if issued):</td></tr>
<tr><td colspan="4">(c) Product information</td><td colspan="2">(d) Resource management</td></tr>
<tr><td colspan="2">Description of product</td><td colspan="2">Type of processing authorized on board:</td><td colspan="2">Reference of applicable conservation and management measures:</td></tr>
<tr><td>Species:</td><td>JPN import statistical code:</td><td>Catch dates:</td><td>Estimated live weight (kg):</td><td>Estimated weight to be landed (kg):</td><td>Verified weight landed (kg) where appropriate</td></tr>
<tr><td colspan="6">Catch area: put a check mark to the appropriate box.</td></tr>
<tr><td colspan="2">FAO Code:
☐ 18 (Arctic Sea)
☐ 21 (Atlantic, Northwest)
☐ 27 (Atlantic, Northeast)
☐ 31 (Atlantic, Western Central)
☐ 34 (Atlantic, Eastern Central)
☐ 37 (Mediterranean and Black Sea)
☐ 41 (Atlantic, Southwest)</td><td colspan="2">☐ 47 (Atlantic, Southeast)
☐ 48 (Atlantic, Antarctic)
☐ 51 (Indian Ocean, Western)
☐ 57 (Indian Ocean, Eastern)
☐ 58 (Indian Ocean, Antarctic)
☐ 61 (Pacific, Northwest)
☐ 67)Pacific, Northeast)
☐ 71 (Pacific, Western Central)</td><td colspan="2">☐ 77 (Pacific, Eastern Central)
☐ 81 (Pacific, Southwest)
☐ 87 (Pacific, Southeast)
☐ 88 (Pacific, Antarctic)

Applicable RFMOs, if any</td></tr>
<tr><td colspan="6">(e) Master of fishing vessel</td></tr>
<tr><td colspan="6">Name of master of fishing vessel – Signature – Seal:</td></tr>
</table>

(f) Declaration of transshipment at sea					
Name of master of fishing vessel:	Signature and date:		Transshipment date/area/position:		Estimated weight (kg):
Master of receiving vessel:	Signature:	Vessel name:		Call sign:	IMO/Lloyd/s number (if issued):
(g) Transshipment authorization within a port area					
Name and title of official:	Name of authority:	Signature:		Address of authority:	Tel:
Port of landing:		Date of landing:		Seal (stamp):	
(h) Exporter:					
Name and address of exporter:	Signature:		Date:		Seal (stamp):
(i) Flag State authority validation					
Name/Title:	Signature:		Date:		Seal (stamp):
(j) Transport details (see Annex)					
(k) Importer declaration					
Name and address of importer:	Signature:	Date:		Seal:	JPN import statistical code:
Documents required for import via a third country:					
(l) Import control authoroity					

Annex 3 – Transshipment declaration examples

1. The EU's catch certificate includes a transshipment declaration where the following information is required:[235]

<table>
<tr><td colspan="3">6. Declaration of transshipment at sea
Name of master of fishing vessel</td><td>Signature and date</td><td colspan="2">Transshipment date/area/position</td><td colspan="2">Estimated weight (kg)</td></tr>
<tr><td colspan="2">Master of receiving vessel</td><td>Signature</td><td colspan="2">Vessel name</td><td>Call sign</td><td colspan="2">IMO number or, of not applicable, other unique vessel identifier (if applicable)</td></tr>
<tr><td colspan="9">7. Transshipment and/or landing authorisation within a port area:</td></tr>
<tr><td rowspan="3">Name</td><td rowspan="3">Authority</td><td rowspan="3">Signature</td><td rowspan="3">Address</td><td rowspan="3">Telephone</td><td>Port of landing (as appropriate)</td><td>Date of landing (as appropriate)</td><td colspan="2">Seal (stamp)</td></tr>
<tr><td>Port of transshipment (as appropriate)</td><td>Date of transshipment (as appropriate)</td><td>Name and registration number of receiving vessel</td><td rowspan="2">Seal (stamp)</td></tr>
<tr><td></td><td></td><td>IMO number or, if applicable, other unique vessel identifier (if applicable) of receiving vessel</td></tr>
</table>

2. US SIMP Model Transshipping Certificate for Traceability outlined by NOAA.[236]

NOAA FISHERIES

<table>
<tr><th colspan="3">Model Transshipment Certificate for Traceability</th></tr>
<tr><td colspan="3">( ) Wild Harvest or ( ) Farm Raised</td></tr>
<tr><td colspan="3">Referenced Unique Catch Document Identifier(s)*</td></tr>
<tr><td colspan="3">Port or Storage Location of Loading/Unloading</td></tr>
<tr><td>Name of Vessel/Cold Storage Unloaded from</td><td>Unique Unloaded Vessel Identifier (registration, documentation, or license number)</td><td rowspan="2">Date(s) of Unloading/Loading</td></tr>
<tr><td>Name of Vessel/Cold Storage Loaded to</td><td>Unique Receiving Vessel Identifier (registration, documentation, or license number)</td></tr>
<tr><td>Commodity Scientific Name</td><td>Commodity Market Name</td><td>Product ASFIS code</td></tr>
<tr><td>Transshipped Weight [( )lb or ( )kg]</td><td>Transshipped Lot Identifier(s)[b]</td><td>Transshipped Product Form</td></tr>
<tr><td>Production Date(s)</td><td>Number of Packages</td><td>Type of Packaging</td></tr>
</table>

*Note: A Unique Document Identifier is provided by the harvester or landing recipient and should reflect the unique identifier of a catch or landing certificate.

[b]Note: A Lot Identifier is generated by the shipper based on its cargo tracking and record keeping protocols.

3. Japan's catch certificate includes a transshipment declaration where the following information is required:[237]

(f) Declaration of transshipment at sea				
Name of master of fishing vessel:	**Signature and date:**	**Transshipment date/area/position:**	**Estimated weight (kg):**	
Master of receiving vessel:	**Signature:**	**Vessel name:**	**Call sign:**	**IMO/Lloyd's number (if issued):**
(g) Transshipment authorization within a port area				
Name and title of official:	**Name of authority:**	**Signature:**	**Address of authority:**	**Tel.:**
Port of landing:	**Date of landing:**	**Seal (stamp):**		

Annex 4 – Processing statement examples

1. EU processing statement as outlined in Annex IV Statement under Article 14(2) of Council Regulation (EC) No .../2008 of 29 September 2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing[238]

Statement under Article 14(2) of Council ▶ C1 Regulation (EC) No 1005/2008 ◀ of 29 September 2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing

I confirm that the processed fishery products: ... (product description and Combined Nomenclature code) and been obtained from catches imported under the following catch certificate(s):

Catch certificate number	Vessel name(s) and flag(s)	Validation date(s)	Catch description	Total landed weight (kg)	Catch processed (kg)	Processed fishery product (kg)

Name and address of the processing plant:

.....

.....

.....

Name and address of the exporter (if different from the processing plant):

.....

.....

.....

Approval number of the processing plant:

.....

Health certificate number and date:

.....

Responsible person of the processing plant:	Signature:	Date:	Place:

Endorsement by the competent authority:

.....

Official:	Signature and seal:	Date:	Place:

2. US SIMP Model processing certificate as outlined by NOAA[239]

Model Reprocessing Certificate for Traceability – Primary or Secondary Processing			
( )Wild Harvest or ( )Farm Raised			
Referenced Unique Catch Document Identifier(s)*	Company Product Received From:		
Processor Name	Processor Address	Processor Approval or Registration Number	Phone: Email:
Commodity Scientific Name	Commodity Market Name		Product ASFIS code
Received Weight [( )lbs or ( )kg]	Received Lot Identifier(s)[a]	Received Product Form	
Processed Weight [( )lbs or ( )kg]	Finished Lot Identifier(s)[a]	Finished Product Form	
Finished Product Weight [( )lbs or ( )kg]			
Production Date(s)	Number of Packages		Type of Packaging

*Note: A Unique Document Identifier is provided by the harvester or landing recipient and should reflect the unique identifier of a catch or landing certificate.

*Note: A Lot Identifier is generated by the processor based on its product tracking and record-keeping protocols.

3. Japan's processing statement outlined in Attachment 9 for Class II Aquatic Animals and Plants under Article 11 of Act on Ensuring the Proper Domestic Distribution and Importation of Aquatic Animals and Plants.[240]

Processing Statement of Class II Aquatic Animals and Plants under Article 11 of Act on Ensuring the Proper Domestic Distribution and Importation of Aquatic Animals and Plants

I confirm that the processed fishery products ..... (Product description and Japanese import statistical code) have been obtained from catches imported under the following catch certificate(s) as follows:

Catch certificate number:	Vessel name(s) and Flag(s)	Validation date(s):	Catch description:	Total landed weight (kg):	Catch processed (fishery products) (kg):	Processed fishery product (kg):

Name and address of the processing plant:

.....

.....

Name and address of the exporter (if different from the processing plant):

.....

.....

Responsible person of the processing plant:	Signature:	Date:	Place:

Endorsement by the competent authority:

.....

.....

Name of official, title, and authority:	Signature:	Date:	Place:

Annex 5 – Simplified catch certificate examples

1. EU simplified catch certificate as detailed in Annex IV of Commission Regulation (EC) No 1010/2009 of 22 October 2009 laying down detailed 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.[241]

<table>
<tr><td colspan="6">EUROPEAN COMMUNITY CATCH CERTIFICATE
Simplified form for fishery products fulfilling the requirements in Article 6 of this Regulation</td></tr>
<tr><td colspan="6">(I) EUROPEAN COMMUNITY CATCH CERTIFICATE – Simplified form for fishery products fulfilling the requirements in Article 6 of this Regulation</td></tr>
<tr><td colspan="3">Document number</td><td colspan="3">Validating authority (name, address, tel., fax)</td></tr>
<tr><td colspan="2">1. Description of product</td><td colspan="4">2. References of applicable conservation and management measures</td></tr>
<tr><td>Species</td><td colspan="2">Product code</td><td colspan="3">Verified weight landed (kg)</td></tr>
<tr><td></td><td colspan="2"></td><td colspan="3"></td></tr>
<tr><td colspan="6">3. List of vessels that have provided catches and the quantities by each vessel (name, registration number, etc. annexed):</td></tr>
<tr><td colspan="6"></td></tr>
<tr><td>4. Name, address, tel. and fax of exporter</td><td colspan="2">Signature</td><td>Date</td><td colspan="2">Seal (stamp)</td></tr>
<tr><td colspan="6">5. Flag State authority validation</td></tr>
<tr><td>Name/Title</td><td colspan="2">Signature</td><td>Date</td><td colspan="2">Seal (stamp)</td></tr>
<tr><td colspan="6">6. Transport details (see Appendix)</td></tr>
<tr><td colspan="6">7. Importer declaration:</td></tr>
<tr><td>Name and address of Importer</td><td colspan="2">Signature</td><td>Date</td><td>Seal (stamp)</td><td>Product CN code</td></tr>
<tr><td>8. Import control: Authority</td><td>Place</td><td colspan="2">Importation authorised (*)</td><td>Importation suspended (*)</td><td>Verification requested – date</td></tr>
<tr><td>Customs declaration (if issued)</td><td colspan="2">Number</td><td colspan="2">Date</td><td>Place</td></tr>
</table>

(*) Tick as appropriate

2. US SIMP model catch certificate as outlined by NOAA, ** indicates information not required for small-scale fisheries.[242]

NOAA FISHERIES

Model Catch Certificate for Traceability – Harvest and Landing/Receipt		
(1) Unique Catch or Production Identifier		( )Wild Capture Fishery (Complete Section 2) ( )Farm Raised (Complete Section 3)
(2) Complete this section for wild capture fish products		
Flag State of vessel	Name of Harvesting vessel**	Vessel registration or Document Number**
Fishing Permit Number**	Fishing/Catch Area:	Fishing Gear:
(3) Complete this section for farm raised fish products		
State of jurisdiction:	Facility Licence or Authorization**	Name and Location of Aquaculture Facility**
(4) Complete this section for receipt of fish products		
Name of Recipient, Processor or Buyer	Facility Licence or Authorization**	Name and Location of Aquaculture Facility**
Receiving Facility or Vessel	Date of Landing/Transshipment	Name and Location of Aquaculture Facility**
Species of Fish (ASFIS 3 alpha code) 1. ..... 2. ..... 3. ..... 4. ..... 5.	Landed or Delivered Weight 1. ..... ( )lb or ( )kg 2. ..... ( )lb or ( )kg 3. ..... ( )lb or ( )kg 4. ..... ( )lb or ( )kg 5. ..... ( )lb or ( )kg	Product Form 1. ..... 2. ..... 3. ..... 4. ..... 5. .....

*Note:Unique Document Identifier is provided by the harvester or landing recipient or competent authority.

**Not required if completing an aggregated catch certificate for small-scale vessels or aquaculture facilities.

3. Japan's Catch Certificate in Simplified form for small-scale fishing vessels as outlined in Attachment 8 for Class II Aquatic Animals and Plants under Article 11 of Act on Ensuring the Proper Domestic Distribution and Importation of Specified Aquatic Animals and Plants[243]

Catch Certificate for Class II Aquatic Animals and Plants under Article 11 of Act on Ensuring the Proper Domestic Distribution and Importation of Specified Aquatic Animals and Plants (Simplified form for small-scale fishing vessels)

<table>
<tr><td colspan="5">(a) Validating authority</td></tr>
<tr><td colspan="2">Document number:</td><td colspan="3">Validating authority (Name, address, tel, fax)</td></tr>
<tr><td colspan="3">(b) Product information</td><td colspan="2">(c) Resource management</td></tr>
<tr><td colspan="3">Description of product</td><td colspan="2">Reference of applicable conservation and management measures:</td></tr>
<tr><td colspan="2">Species</td><td colspan="2">JPN import statistical code:</td><td>Verified weight landed (kg) (if applicable):</td></tr>
<tr><td colspan="5">(d) List of vessels that have provided catches and the quantities by each vessel (name, registration number, etc. annexed)</td></tr>
<tr><td colspan="5"></td></tr>
<tr><td colspan="5">(e) Exporter</td></tr>
<tr><td>Name and address of exporter:</td><td>Signature:</td><td>Date:</td><td colspan="2">Seal (stamp):</td></tr>
<tr><td colspan="5">(f) Flag State authority validation</td></tr>
<tr><td>Name/title:</td><td>Signature:</td><td>Date:</td><td colspan="2">Seal (stamp):</td></tr>
<tr><td colspan="5">(g) Transport details (see Annex)</td></tr>
<tr><td colspan="5">(h) Importer declaration</td></tr>
<tr><td>Name and address of importer:</td><td>Signature:</td><td>Date:</td><td>Seal (stamp):</td><td>JPN import statistical code:</td></tr>
<tr><td colspan="5">Documents required for import via a third country:</td></tr>
<tr><td colspan="5">(i) Import control authority</td></tr>
</table>

Annex 6 – The Global Charter for Fisheries Transparency

The 10 Global Charter for Fisheries Transparency principles:[244]

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 labour 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.
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.
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.

Endnotes

1 FAO (2017) Voluntary Guidelines for Catch Documentation Schemes. Available at: https://openknowledge.fao.org/handle/20.500.14283/i8076en

2 FAO (2017) Voluntary Guidelines for Catch Documentation Schemes. Available at: https://openknowledge.fao.org/handle/20.500.14283/i8076en

3 FAO (2017) Voluntary Guidelines for Catch Documentation Schemes. Available at: https://openknowledge.fao.org/handle/20.500.14283/i8076en

4 United Nations Convention on the Law of the Sea. Article 56. Available at: https://www.un.org/depts/los/convention_agreements/texts/unclos/unclos_e.pdf

5 FAO (2017) Voluntary Guidelines for Catch Documentation Schemes. Available at: https://openknowledge.fao.org/handle/20.500.14283/i8076en

6 Find more information at:: https://www.iuuwatch.eu/eu-external-fleet-regulation/import-control-schemes/. Accessed 13.10.2025.

7 Find more information at: https://www.fao.org/port-state-measures/background/en/. Accessed 13.10.2025.

8 Hosch, G. (2016). Design options for the development of tuna catch documentation schemes. FAO Fisheries and Aquaculture Technical Paper No. 596. Rome, FAO. Available at: https://openknowledge.fao.org/items/9877e52d-7333-4db1-bd83-90853d6e713b.

9 FAO (2017) Voluntary Guidelines for Catch Documentation Schemes. Available at: https://openknowledge.fao.org/handle/20.500.14283/i8076en

10 FAO (2025) Codex Alimentarius Commission. Available at: https://www.fao.org/food-safety/food-control-systems/supply-chains-and-consumers/traceability-and-recalls/en/.

11 FAO (2017) Voluntary Guidelines for Catch Documentation Schemes. Available at: https://openknowledge.fao.org/handle/20.500.14283/i8076en

12 European Parliament resolution of 18 January 2024 on the impact of illegal fishing on food security – the role of the European Union (2023/2027(INI)). Available at: https://eur-lex.europa.eu/eli/C/2024/5732/oj/eng.

13 WWF (2021) Seafood & People. https://www.wwf.org.uk/sites/default/files/2021-08/Seafood-and-People_0.pdf

14 Selig, E. R., Nakayama, S., Wabnitz, C. C. C., Österblom, H., et al. (2022) Revealing global risks of labor abuse and illegal, unreported, and unregulated fishing. Nature Communications, 1612. https://doi.org/10.1038/s41467-022-28916-2.

15 EJF (2019). Blood and Water: Human rights abuse in the global seafood industry. Available at: https://ejfoundation.org/reports/blood-and-water-human-rights-abuse-in-the-global-seafood-industry. Accessed 10.12.24.

16 Royal United Services Institute for Defence and Security Studies (RUSI) (2017). Below the Surface: How Illegal, Unreported and Unregulated Fishing threatens our security. Available at: https://rusi.org/explore-our-research/projects/below-the-surface-how-illegal-fishing-threatens-our-security. Accessed 10.12.24.

17 Hosch, G. & Blaha, F. (2017). Seafood traceability for fisheries compliance: Country-level support for catch documentation schemes. FAO Fisheries and Aquaculture Technical Paper No. 619. Rome, FAO. https://openknowledge.fao.org/items/41d112ed-0c69-4740-b47d-a6d955fd565c.

18 Itad (2025) 'Research and Evaluation of Import Control Rules Designed to Reduce Illegal, Unregulated, and Unreported Fishing.' Brighton: Itad. Accessed 2.4.25.

19 FAO (2001) International Plan of Action to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing. Available at: https://www.fao.org/iuu-fishing/international-framework/ipoa-iuu/en/. Accessed 3.6.2025.

20 UN (2024) The toll of Illegal, Unreported and Unregulated Fishing. Available online at: https://www.un.org/en/observances/end-illegal-fishing-day.

21 Any estimate of IUU fishing comes with uncertainty due to the opaque nature of global fisheries and IUU fishing.

22 Daniels, A., Gutiérrez, M., Fanjul, G., Guereña, A., et al. (2016) Western Africa's missing fish: The impacts of illegal, unreported, and unregulated fishing and under-reporting catches by foreign fleets. Overseas Development Institute. Accessible at: https://digitalcommons.fiu.edu/cgi/viewcontent.cgi?article=2006&context=srhreports. Accessed 14.1.25.

23 Agyeman, N. A., Blanco-Fernandez, C., Steinhaussen, S. L., Garcia-Vazquez, E., et al. (2021) Illegal, Unreported, and Unregulated Fisheries Threatening Shark Conservation in African Waters Revealed from High Levels of Shark Mislabelling in Ghana. Genes, 12, 1002. https://doi.org/10.3390/genes12071002.

24 The EEZ is an area beyond and adjacent to the territorial sea, under which the rights and jurisdiction of the coastal State and the rights and freedoms of other States are governed by the relevant provisions of the United Nations Convention on the Law of the Sea (UNCLOS). United Nations Convention on the Law of the Sea. Article 56. Available at: https://www.un.org/depts/los/convention_agreements/texts/unclos/unclos_e.pdf.

25 Collins, C., Nuno, A., Broderick, A., Curnick, D. J., et al. (2021) Understanding Persistent Non-compliance in a Remote, Large-Scale Marine Protected Area. Frontiers in Marine Science, 8, 650276. https://doi.org/10.3389/fmars.2021.650276

26 Island Times (2017) 'Chinese fishing vessel crew arrested for poaching endangered sharks off Galapagos Islands'. Available at: https://islandtimes.org/chinese-fishing-vessel-crew-arrested-for-poaching-endangered-sharks-off-galapagos-islands/. Accessed 10.12.24.

27 American Security Project (2021) Bad catch: Examining Illegal, Unreported and Unregulated fishing (White Paper). Available at: https://www.americansecurityproject.org/wp-content/uploads/2021/09/Ref-0253-Bad-Catch-Examining-IUU-Fishing.pdf. Accessed 10.12.24.

28 EJF (2019). Blood and Water: Human rights abuse in the global seafood industry. Available at: https://ejfoundation.org/reports/blood-and-water-human-rights-abuse-in-the-global-seafood-industry. Accessed 10.12.24.

29 Royal United Services Institute for Defence and Security Studies (RUSI) (2017). Below the Surface: How Illegal, Unreported and Unregulated Fishing threatens our security. Available at: https://rusi.org/explore-our-research/projects/below-the-surface-how-illegal-fishing-threatens-our-security. Accessed 10.12.24.

30 The Pew Charitable Trusts (2022). More Than 100,000 Fishing-Related Deaths Occur Each Year, Study Finds. Available at https://www.pew.org/en/research-and-analysis/issue-briefs/2022/11/more-than-100000-fishing-related-deaths-occur-each-year-study-finds. Accessed 2.7.25.

31 Laffoley, D., Baxter, J. M., Amon, D. J., Currie, D. E.J., et al. (2019). Eight urgent, fundamental and simultaneous steps needed to restore ocean health, and the consequences

for humanity and the planet of inaction or delay. Aquatic conservation: Marine and Freshwater Ecosystems. 1-15. https://doi.org/10.1002/aqc.3182.

32 FAO (2017) Voluntary Guidelines for Catch Documentation Schemes. Available at: https://openknowledge.fao.org/handle/20.500.14283/i8076en. Accessed 14.1.25

33 Ibid.

34 Ibid.

35 FAO (2024) The State of World Fisheries and Aquaculture 2024 – Blue Transformation in action. Rome. https://doi.org/10.4060/cd0683en

36 Council Regulation (EC) No 1005/2008 of 29 September 2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing, amending Regulations (EEC) No 2847/93, (EC) No 1936/2001 and (EC) No 601/2004 and repealing Regulations (EC) No 1093/94 and (EC) No 1447/1999. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02008R1005-20240109. Accessed 31.3.25.

37 Certain fishery products have been excluded from the scope of the IUU Regulation because they are either not obtained from catches in maritime waters or of minor importance from the perspective of conservation and management measures and trade to the EU.

38 Find EU Carding decisions here: https://oceans-and-fisheries.ec.europa.eu/document/download/dac17bdf-42cf-4525-884c-44050b31d6a0_en?filename=illegal-fishing-overview-of-existing-procedures-third-countries_en.pdf. Accessed 8.7.25.

39 Find details on how the EU Carding system operates here: EU IUU Fishing Coalition (2024) The EU IUU Fishing Carding Process. Available at: https://www.iuuwatch.eu/wp-content/uploads/2025/01/The-EU-IUU-Fishing-Carding-Process.pdf.

40 Council Regulation (EU) 2023/2842 of the European Parliament and of the Council of 22 November 2023 amending Council Regulation (EC) No 1224/2009, and amending Council Regulations (EC) No 1967/2006 and (EC) No 1005/2008 and Regulations (EU) 2016/1139, (EU) 2017/2403 and (EU) 2019/473 of the European Parliament and of the Council as regards fisheries control. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202302842. Accessed 13.1.25.

41 EU IUU Fishing Coalition (2016) Modernisation of the EU IUU Regulation Catch Certificate System. Available at http://www.iuuwatch.eu/wp-content/uploads/2016/07/Modernisation-FINAL.pdf and European Court of Auditors (2022) EU Action to combat illegal fishing: Control systems in place but weakened by uneven checks and sanctions by Member States. Available at: https://www.eca.europa.eu/en/publications?did=61941. Accessed 6.6.25.

42 European Court of Auditors (2022) EU action to combat illegal fishing; Control systems in place but weakened by uneven checks and sanctions by Member States. Available at: https://www.eca.europa.eu/lists/ecadocuments/sr22_20/sr_illegal_fishing_en.pdf. Accessed 4.7.25.

43 Council Regulation (EU) 2023/2842 of the European Parliament and of the Council of 22 November 2023 amending Council Regulation (EC) No 1224/2009, and amending Council Regulations (EC) No 1967/2006 and (EC) No 1005/2008 and Regulations (EU) 2016/1139, (EU) 2017/2403 and (EU) 2019/473 of the European Parliament and of the Council as regards fisheries control. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202302842. Accessed 18.12.24.

44 Further information on SIMP is available at: https://www.fisheries.noaa.gov/international/international-affairs/seafood-import-monitoring-program.

45 NOAA Fisheries, Guide to audit requirements for the Seafood Import Monitoring Program: Frequently Asked Questions, https://media.fisheries.noaa.gov/2020-12/SIMP%20Audit%20Guidance%202020.pdf?null=. Accessed on 11.2.2025.

46 NOAA Fisheries (2021). Report on the Implementation of the U.S. Seafood Import Monitoring Program. An operation led by OLE: 'found that some consignments of tuna were being misidentified during entry filing as bonito, which has significantly lower tariff rates. This type of misidentification can also circumvent the admissibility requirements under SIMP and other NOAA seafood trade monitoring programs. In addition to NOAA actions, CBP identified 32 companies misreporting tuna as bonito and took actions to recover nearly $600,000 in lost revenue to the United States due to the underpayment of tariffs.' Available at: https://media.fisheries.noaa.gov/2021-05/SIMP%20Implementation%20Report%202021.pdf.

47 NOAA Fisheries. (2024). Action Plan to Improve the U.S. Seafood Import Monitoring Program. Available at: https://www.fisheries.noaa.gov/s3/2024-11/SIMP-Action-Plan_final.pdf. Accessed 2.12.24.

48 Ibid.

49 Act on Ensuring the Proper Domestic Distribution and Importation of Specified Aquatic Animals and Plants. Further information is available at: https://www.jfa.maff.go.jp/220614.html. Accessed 2.12.24.

50 Ministry of Agriculture, Forestry and Fisheries of Japan (MAFF). TECHNICAL NOTE on Class II Aquatic Animals and Plants Ver 2.0. (2022). Available at:https://www.jfa.maff.go.jp/220614.html. Accessed 26.2.24.

51 FAO (2001) International Plan of Action to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing. Available at: https://www.fao.org/iuu-fishing/international-framework/ipoa-iuu/en/. Accessed 3.6.2025.

52 IOTC (2025) Report of the 22nd Session of the Compliance Committee. Available at: https://iotc.org/sites/default/files/documents/2025/04/IOTC-2025-CoC22-RE_-_ADOPTED_0.pdf. Accessed 14.10.2025.

53 Blasiak, R. (2015) Balloon effects reshaping global fisheries. Marine Policy 57, 18–20. https://doi.org/10.1016/j.marpol.2015.03.013.

54 Hosch, G. & Clarke, S.C. (2025) Advancing the crucial notion of "interoperability" in catch documentation schemes. Fisheries Management and Ecology, 2025; 0:e, 12812. https://doi.org/10.1111/fme.12812.

55 FAO (2017) Voluntary Guidelines for Catch Documentation Schemes. Available at: https://openknowledge.fao.org/handle/20.500.14283/i8076en. Accessed 14.1.25.

56 "Transshipment means the unloading of goods from one ship and its loading into another to complete a journey to a further destination, even when the cargo may have to remain ashore some time before its onward journey." Original source:: https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Glossary:Transshipment.

57 Seto, K., Miller, N., Young, M., & Hanich, Q. (2022) Toward transparent governance of transboundary fisheries: The case of Pacific tuna transshipment. Marine Policy, 136, 104200. https://doi.org/10.1016/j.marpol.2020.104200.

58 Freitas, B, World Wildlife Fund (2021) Corruption in the Fisheries Sector: Import Controls, Transparency, and WWF Practice. https://files.worldwildlife.org/wwfcmsprod/files/Publication/file/38fj9xu5zq_Fisheries_KP.pdf.

59 EU IUU Coalition (2016) Risk Assessment and Verification of Catch Certificates under the EU IUU Regulation. https://www.iuuwatch.eu/wp-content/uploads/2016/07/Risk-Assessment-FINAL.pdf.

60 Sharma, R., Barange, M., Agostini, V., Barros, P., et al. (2025) Review of the state of world marine fishery resources – 2025. FAO Fisheries and Aquaculture Technical Paper, No. 721. Rome. FAO. https://doi.org/10.4060/cd5538en

61 Selig, E., R., Nakayama, S., Wabnitz, C. C. C., Österblom, H., et al. (2022) Revealing global risks of labor abuse and illegal, unreported, and unregulated fishing. Nature Communications, 13, 1612. https://doi.org/10.1038/s41467-022-28916-2.

62 Haenlein, C. (2017) RUSI, Below the Surface: How Illegal, Unreported and Unregulated Fishing Threatens our Security https://rusi.org/explore-our-research/publications/occasional-papers/below-surface-how-illegal-unreported-and-unregulated-fishing-threatens-our-security. Accessed 24.3.2025

63 Gruber, C., Schlieman, L., Fritzhand, N., & Yozell, S. (2023) Traceability, Targeting, and Transparency in U.S. Seafood Trade Programming. The Stimson Center, Washington D.C., USA.

64 NOAA. (2024). Action Plan to Improve the U.S. Seafood Import Monitoring Program. Available at: https://www.fisheries.noaa.gov/s3/2024-11/SIMP-Action-Plan_final.pdf. Accessed 2.12.2024.

65 Global Dialogue on Seafood Traceability (2023). Standards & Guidelines for Interoperable Seafood Traceability Systems - Core Normative Standards (Version 1.2). More information is accessible at: https://thegdst.org/resources/standard/.

66 WWF Indonesia & Indonesia Business Council for Sustainable Development (2020) Sustainable Sourcing Guideline. https://www.wwf-scp.org/wp-content/uploads/2021/08/Sustainable-Sourcing-Guideline-ENG-Spread-2.pdf. Accessed 17.12.2024.

67 Ibid.

68 Mosnier, F. (Planet Tracker) (2022) How retailers can be sustainable and profitable in seafood https://planet-tracker.org/wp-content/uploads/2022/07/Carrefour-report.pdf. Accessed 11.02.2025

69 Warner K., Mustain, P., Lowell, B., Geren, S., et al. (2016) Deceptive dishes: Seafood Swaps Found Worldwide. https://usa.oceana.org/wp-content/uploads/sites/4/global_fraud_report_final_low-res.pdf. Accessed 17.12.2024.

70 Mosnier, F. (2022) How To Trace $600 billion. Traceability Could Add 60% to Global Seafood Profits. Planet Tracker. Available at: https://planet-tracker.org/wp-content/uploads/2022/09/How-to-Trace-USD600-billion.pdf.

71 Hilborn, R., Amoroso, R. O., Anderson, C. M., Baum, J. K. et al. (2020) Effective fisheries management instrumental in improving fish stock status. Biological Sciences, 117, 2218-2224, https://doi.org/10.1073/pnas.1909726116.

72 Hosch, G. (2016) Trade Measures to Combat IUU Fishing: Comparative analysis of Unilateral and Multilateral Approaches. Geneva: International Centre for Trade and Sustainable Development (ICTSD). https://www.bloomassociation.org/wp-content/uploads/2016/10/trade_measures_to_combat_iuu_fishing.pdf.

73 EU IUU Coalition (2020) A comparative study of key data elements in import control schemes aimed at tackling illegal, unreported and unregulated fishing in the top three seafood markets: the European Union, the United States and Japan. Available at: https://www.iuuwatch.eu/wp-content/uploads/2020/01/CDS-Study-WEB.pdf. Accessed 9.12.24.

74 EU IUU Coalition (2016) Modernisation of the EU IUU Regulation Catch Certification System. Available at: https://www.iuuwatch.eu/wp-content/uploads/2016/07/Modernisation-FINAL.pdf. Accessed 9.12.24.

75 Merrifield, M., Gleason, M., Bellquist, L., Kauer, K., et al. (2019) eCATCH: Enabling collaborative fisheries management with technology. Ecological Informatics, 52, 82-93. https://doi.org/10.1016/j.ecoinf.2019.05.010.

76 EU IUU Coalition (2016) Risk Assessment and Verification of Catch Certificates under the EU IUU Regulation. https://www.iuuwatch.eu/wp-content/uploads/2016/07/Risk-Assessment-FINAL.pdf.

77 Hosch, G. & Clarke, S.C. (2025) Advancing the crucial notion of "interoperability" in catch documentation schemes. Fisheries Management and Ecology, 2025; 0:e, 12812. https://doi.org/10.1111/fme.12812.

78 Yozell, S., Lewis, S., Kuruc, M., Gruber, C., et al. (2024) Workshop Summary Report: Reimagining the Seafood Import Monitoring Program, Workshop I. Available at: https://fishwise.org/resource/reimagining-the-seafood-import-monitoring-program-session-i/. Accessed 26.2.25.

79 Council Regulation (EC) No 1005/2008 of 29 September 2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing, amending Regulations (EEC) No 2847/93, (EC) No 1936/2001 and (EC) No 601/2004 and repealing Regulations (EC) No 1093/94 and (EC) No 1447/1999. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02008R1005-20240109. Accessed 31.3.25.

80 Council Regulation (EU) 2023/2842 of the European Parliament and of the Council of 22 November 2023 amending Council Regulation (EC) No 1224/2009, and amending Council Regulations (EC) No 1967/2006 and (EC) No 1005/2008 and Regulations (EU) 2016/1139, (EU) 2017/2403 and (EU) 2019/473 of the European Parliament and of the Council as regards fisheries control. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202302842. Accessed 14.8.25.

81 Magnuson-Stevens Fishery Conservation and Management Act: Seafood Import Monitoring Program. 50 CFR 300.320-300.325 https://www.regulations.gov/document/NOAA-NMFS-2022-0119-0001.

82 Tariff Act of 1930, Section 307. U.S.C. Title 19 - CUSTOMS DUTIES. Section 307 (amended Section 1307) Convict-made goods; importation prohibited. Available at: https://www.congress.gov/crs-product/IF11360. Accessed 14.10.2025.

83 Hosch, G. (2016). Design options for the development of tuna catch documentation schemes. FAO Fisheries and Aquaculture Technical Paper No. 596. Rome, FAO. Available at: https://openknowledge.fao.org/items/9877e52d-7333-4db1-bd83-90853d6e713b.

84 Article 1 of Council Regulation (EC) No 1005/2008 of 29 September 2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing, amending Regulations (EEC) No 2847/93, (EC) No 1936/2001 and (EC) No 601/2004 and repealing Regulations (EC) No 1093/94 and (EC) No 1447/1999. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02008R1005-20240109. Accessed 31.3.25.

85 Act on Ensuring the Proper Domestic Distribution and Importation of Specified Aquatic Animals and Plants.

Further information is available at: https://www.jfa.maff.go.jp/220614.html. Accessed 2.12.24.

86 EU IUU Fishing Coalition (2020) A comparative study of key data elements in import control schemes aimed at tackling illegal, unreported and unregulated fishing in the top three seafood markets: the European Union, the United States and Japan. Available at https://www.iuuwatch.eu/wp-content/uploads/2020/01/CDS-Study-WEB.pdf. Accessed 16.1.25.

87 EU IUU Fishing Coalition (2025) Import control schemes in major seafood markets: a comparative study of key data elements in the European Union, the United States, Japan and the Republic of Korea. Available at: https://www.iuuwatch.eu/wp-content/uploads/2025/09/CDS-KDE-Study-FINAL.pdf.

88 Certain fishery products have been excluded from the scope of the IUU Regulation because they are either not obtained from catches in maritime waters or of minor importance from the perspective of conservation and management measures and trade to the EU.

89 Pardo, M. A., Jiménez, E., Pérez-Villarreal, B. (2016). Misdescription incidents in seafood sector. Food Control, 62, 277-283. https://doi.org/10.1016/j.foodcont.2015.10.048.

90 Giusti, A., Malloggi, C., Tinacci, L., Nucera, D., et al. (2023) Mislabeling in seafood products sold on the Italian market: A systematic review and meta-analysis. Food Control, 145, 109395. https://doi.org/10.1016/j.foodcont.2022.109395.

91 Giovas, I., Arculeo M., Doumpas, N., Katsada, D., et al. (2020) Assessing multiple sources of data to detect illegal fishing, trade and mislabelling of elasmobranchs in Greek markets. Marine Policy, 112, 103730. https://doi.org/10.1016/j.marpol.2019.103730.

92 Steinkruger, A., Kroetz, K., Malakoff, K. L., Gephart, J. A., et al. (2025) Seafood traceability program design: Examination of the United States' Seafood Import Monitoring Program. Ambio, 54, 168-174. https://doi.org/10.1007/s13280-024-02075-8.

93 Ibid.

94 See: www.iuufishingindex.net

95 Seto, K. L., Miller, N. A., Kroodsma, D., Hanich, Q., et al. (2023). Fishing through the cracks: The unregulated nature of squid fisheries. Science Advances, 9, eadd8125. https://doi.org/10.1126/sciadv.add8125.

96 Department of Agriculture, Fisheries and Forestry (2023) Measures to prevent the importation of illegal, unreported and unregulated seafood: draft report. https://haveyoursay.agriculture.gov.au/iuu-seafood-imports. Accessed: 6.12.24.

97 Magnuson-Stevens Fishery Conservation and Management Act: Seafood Import Monitoring Program. https://www.regulations.gov/document/NOAA-NMFS-2022-0119-0001

98 EU IUU Fishing Coalition (2020) A comparative study of key data elements in import control schemes aimed at tackling illegal, unreported and unregulated fishing in the top three seafood markets: the European Union, the United States and Japan. The 17 KDEs are what the EU IUU Fishing Coalition consider to be the minimum baseline for a robust catch certificate.

99 FAO Fisheries and Aquaculture Statistics and Information Branch (FIAS), http://www.fao.org/fishery/collection/asfis/en. Accessed 11.6.25.

100 FAO, International Standard Statistical Classification of Fishing Gear, http://www.fao.org/cwp-on-fishery-statistics/handbook/tools-and-resources/en/. Accessed 11.6.25.

101 International Commission for the Conservation of Atlantic Tunas (ICCAT), Data Code System, https://www.iccat.int/en/stat_codes.html. Accessed 11.6.25.

102 For a more detailed analysis please consult: EU IUU Fishing Coalition (2025) Import control schemes in major seafood markets: a comparative study of key data elements in the European Union, the United States, Japan and the Republic of Korea. Available at: https://www.iuuwatch.eu/wp-content/uploads/2025/09/CDS-KDE-Study-FINAL.pdf.

103 Ibid.

104 Hosch (2018) Catch Documentation Schemes for deep-sea fisheries in the ABNJ - Their value, and options for implementation. FAO Fisheries and Aquaculture Technical Paper No. 629. Available at: https://openknowledge.fao.org/server/api/core/bitstreams/4673965e-a0bd-4b85-b67e-43f1d0737508/content.

105 FAO (2022) Understanding and implementing catch documentation schemes - A guide for national authorities. FAO Technical Guidelines for Responsible Fisheries No. 14. https://doi.org/10.4060/cb8243en.

106 EU IUU Fishing Coalition (2025) Import control schemes in major seafood markets: a comparative study of key data elements in the European Union, the United States, Japan and the Republic of Korea. Available at: https://www.iuuwatch.eu/wp-content/uploads/2025/09/CDS-KDE-Study-FINAL.pdf.

107 Department of Agriculture, Fisheries and Forestry (2025) Measures to prevent the importation of illegal, unreported and unregulated seafood: draft report. https://www.agriculture.gov.au/sites/default/files/documents/iuu-fishing-final-report.pdf. Accessed: 13.11.25.

108 Global Dialogue on Seafood Traceability (2023). Standards & Guidelines for Interoperable Seafood Traceability Systems - Core Normative Standards (Version 1.2). More information is accessible at: https://thegdst.org/resources/standard/.

109 Metian, M., Pouil, S., Boustany, A., & Troell, M. (2014) Farming of Bluefin Tuna - Reconsidering Global Estimates and Sustainability Concerns. Review in Fisheries Science & Aquaculture, 22, 184-192. https://doi.org/10.1080/23308249.2014.907771.

110 FAO (2022) Understanding and implementing catch documentation schemes - A guide for national authorities. FAO Technical Guidelines for Responsible Fisheries No. 14. https://doi.org/10.4060/cb8243en.

111 Ibid.

112 Ceron, L., Achi, N., Okrasinski, G., Bell et al. (2024) Sustainable Seafood: Data-Driven Approaches to Social Responsibility. FishWise, Santa Cruz, CA, USA. Available at: https://fishwise.org/resource/sustainable-seafood-data-driven-approaches-to-social-responsibility/.

113 NOAA (2024) Action Plan to Improve the U.S. Seafood Import Monitoring Program. https://www.fisheries.noaa.gov/s3/2024-11/SIMP-Action-Plan_final.pdf. Accessed: 13.1.25.

114 EJF (2013) Transhipment at sea. The Need for a Ban in West Africa. https://ejfoundation.org/resources/downloads/ejf_transhipments_at_sea_web_0.pdf. Accessed: 19.12.2024.

115 The Associated Press. (2015) AP Investigation: Slaves may have caught the fish you bought. https://www.ap.org/explore/seafood-from-slaves/ap-investigation-slaves-may-have-caught-the-fish-you-bought.html. Accessed 19.12.2024.

116 Hosch, G. & Blaha, F. (2017). Seafood traceability for fisheries compliance: Country-level support for catch documentation schemes. FAO Fisheries and

Aquaculture Technical Paper No. 619. Rome, FAO. https://openknowledge.fao.org/items/41d112ed-0c69-4740-b47d-a6d955fd565c.

117 FAO (2022) Understanding and implementing catch documentation schemes - A guide for national authorities. FAO Technical Guidelines for Responsible Fisheries No. 14. https://doi.org/10.4060/cb8243en.

118 Warner K., Mustain, P., Lowell, B., Geren, S., et al. (2016) Deceptive dishes: Seafood Swaps Found Worldwide. https://usa.oceana.org/wp-content/uploads/sites/4/global_fraud_report_final_low-res.pdf. Accessed 17.12.2024.

119 FAO (2022) Understanding and implementing catch documentation schemes - A guide for national authorities. FAO Technical Guidelines for Responsible Fisheries No. 14. https://doi.org/10.4060/cb8243en.

120 Ibid.

121 Ibid.

122 Robertson, L., Hosch, G., Wilcox, C., Domiguez-Martinez, R., M. et al. (2025). A New Seafood Import Policy for Nations to Combat Illegal Fishing. Conservation Letters, 18, e13091. https://doi.org/10.1111/conl.13091.

123 Coastal States hold the fishing authorisations for their jurisdiction, and can be considered for inclusion as a validating authority when foreign fishing vessels are fishing or transshipping in their waters, adding an extra layer of scrutiny in confirming authorisations—although no existing CDS includes this. For more information, see: Hosch (2016) Design options for the development of tuna catch documentation schemes, and FAO (2022) Understanding and implementing catch documentation schemes - A guide for national authorities.

124 FAO (2017) Voluntary Guidelines for Catch Documentation Schemes. Available at: https://openknowledge.fao.org/handle/20.500.14283/i8076en. Accessed 14.1.25.

125 Hosch, G. & Blaha, F. (2017). Seafood traceability for fisheries compliance: Country-level support for catch documentation schemes. FAO Fisheries and Aquaculture Technical Paper No. 619. Rome, FAO. 102 pp.

126 FAO (2022) Understanding and implementing catch documentation schemes - A guide for national authorities. FAO Technical Guidelines for Responsible Fisheries No. 14. https://doi.org/10.4060/cb8243en.

127 Ibid.

128 For example, one of the contributing factors for an EU carding decision are fraudulent catch certificates found within an unreliable seafood traceability system. These would have been validated by the State's competent authority, so validations in practice do not always provide a complete guarantee that the information within a catch certificate is true.

129 For more information on the CCAMLR CDS requirements, visit: https://www.ccamlr.org/en/compliance/catch-documentation-scheme.

130 Article 12 (4) of Council Regulation (EC) No 1005/2008 of 29 September 2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing, amending Regulations (EEC) No 2847/93, (EC) No 1936/2001 and (EC) No 601/2004 and repealing Regulations (EC) No 1093/94 and (EC) No 1447/1999. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02008R1005-20240109. Accessed 31.3.25.

131 FAO (2022) Understanding and implementing catch documentation schemes - A guide for national authorities. FAO Technical Guidelines for Responsible Fisheries No. 14. https://doi.org/10.4060/cb8243en.

132 NOAA Fisheries. (2024). Action Plan to Improve the U.S. Seafood Import Monitoring Program. Available at: https://www.fisheries.noaa.gov/s3/2024-11/SIMP-Action-Plan_final.pdf. Accessed 2.12.24.

133 FAO. (2017) Voluntary Guidelines for Catch Documentation Schemes. https://openknowledge.fao.org/bitstreams/35f12e56-5aec-4dde-b64b-622abfbd9bee/download. Accessed 5.12.2024.

134 European Court of Auditors (2022). EU Action to combat illegal fishing: Control systems in place but weakened by uneven checks and sanctions by Member States. Available at: https://www.eca.europa.eu/en/publications?did=61941. Accessed 6.6.25.

135 EU IUU Coalition (2016) Modernisation of the EU IUU Regulation Catch Certification System. https://www.iuuwatch.eu/wp-content/uploads/2016/07/Modernisation-FINAL.pdf. Accessed 9.12.24.

136 Directorate-General for Maritime Affairs and Fisheries (2024) The EU fisheries control system gets a major revamp, available at: https://oceans-and-fisheries.ec.europa.eu/news/eu-fisheries-control-system-gets-major-revamp-2024-01-09_en. Accessed 7.7.25.

137 FAO (2022) Understanding and implementing catch documentation schemes - A guide for national authorities. FAO Technical Guidelines for Responsible Fisheries No. 14. https://doi.org/10.4060/cb8243en.

138 EU IUU Fishing Coalition (2021) Seafood Traceability: Aligning RFMO Catch Documentation Schemes to Combat IUU fishing. Available at: https://www.iuuwatch.eu/wp-content/uploads/2021/12/EU-IUU-Fishing-Coalition_Seafood-Traceability-Report_Dec-2021-1.pdf.

139 FAO (2022) Understanding and implementing catch documentation schemes - A guide for national authorities. FAO Technical Guidelines for Responsible Fisheries No. 14. https://doi.org/10.4060/cb8243en.

140 Hosch, G. & Clarke, S.C. (2025) Advancing the Crucial Notion of "Interoperability" in Catch Documentation Schemes. Fisheries Management and Ecology, 2025; 0:e, 12812. https://doi.org/10.1111/fme.12812.

141 FAO (2022) Understanding and implementing catch documentation schemes - A guide for national authorities. FAO Technical Guidelines for Responsible Fisheries No. 14. https://doi.org/10.4060/cb8243en.

142 EU IUU Fishing Coalition (2021) Seafood Traceability: Aligning RFMO catch documentation schemes to combat IUU fishing. Available at: https://www.iuuwatch.eu/wp-content/uploads/2021/12/EU-IUU-Fishing-Coalition_Seafood-Traceability-Report_Dec-2021-1.pdf.

143 Global Dialogue on Seafood Traceability (2023). Standards & Guidelines for Interoperable Seafood Traceability Systems - Core Normative Standards (Version 1.2). More information is accessible at: https://thegdst.org/resources/standard/.

144 EU Commission (2024) Frequently asked questions: What is new in the EU CATCH certification scheme after the amendment of the EU IUU regulation. Accessible via: https://oceans-and-fisheries.ec.europa.eu/fisheries/rules/illegal-fishing_en. Accessed 5.12.2024.

145 Hosch, G. & Clarke, S.C. (2025) Advancing the Crucial Notion of "Interoperability" in Catch Documentation Schemes. Fisheries Management and Ecology, 2025; 0:e, 12812. https://doi.org/10.1111/fme.12812.

146 Ibid.

147 Hosch, G. 2018. Catch documentation schemes for deep-sea fisheries in the ABNJ - Their value, and options for

implementation. FAO Fisheries and Aquaculture Technical Paper No. 629. Available at: https://openknowledge.fao.org/server/api/core/bitstreams/4673965e-a0bd-4b85-b67e-43f1d0737508/content. Accessed 10.6.25.

148 Hosch, G. & Clarke, S.C. (2025) Advancing the Crucial Notion of "Interoperability" in Catch Documentation Schemes. Fisheries Management and Ecology, 2025; 0:e, 12812. https://doi.org/10.1111/fme.12812.

149 Regulation (EU) 2023/2842 of the European Parliament and of the Council of 22 November 2023 amending Council Regulation (EC) No 1224/2009, and amending Council Regulations (EC) No 1967/2006 and (EC) No 1005/2008 and Regulations (EU) 2016/1139, (EU) 2017/2403 and (EU) 2019/473 of the European Parliament and of the Council as regards fisheries control. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202302842. Accessed 13.1.2025.

150 EU Commission (2024) Frequently asked questions: What is new in the EU CATCH certification scheme after the amendment of the EU IUU regulation. Accessible via: https://oceans-and-fisheries.ec.europa.eu/fisheries/rules/illegal-fishing_en. Accessed 5.12.2024.

151 Ibid.

152 Council Regulation (EC) No 1005/2008 of 29 September 2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing, amending Regulations (EEC) No 2847/93, (EC) No 1936/2001 and (EC) No 601/2004 and repealing Regulations (EC) No 1093/94 and (EC) No 1447/1999. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02008R1005-20240109. Accessed 31.3.25. https://oceans-and-fisheries.ec.europa.eu/news/eu-fisheries-control-system-gets-major-revamp-2024-01-09_en

153 FAO (2017) Voluntary Guidelines for Catch Documentation Schemes. Available at: https://openknowledge.fao.org/handle/20.500.14283/i8076en. Accessed 14.1.25.

154 Okafor-Yarwood, I., Kadagi, N.I., Belhabib, D., & Allison, E.H. (2022) Survival of the Richest, not the Fittest: How attempts to improve governance impact African small-scale marine fisheries. Marine Policy, 135, 104847. https://doi.org/10.1016/j.marpol.2021.104847.

155 Article 6 of Commission Regulation (EC) No 1010/2009 of 22 October 2009 laying down detailed 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. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02009R1010-20200327. Accessed 31.3.25.

156 NOAA (2016) Seafood Import Monitoring Program. https://www.regulations.gov/document/NOAA-NMFS-2015-0122-0111.

157 Act on Ensuring the Proper Domestic Distribution and Importation of Specified Aquatic Animals and Plants. Further information is available at: https://www.jfa.maff.go.jp/220614.html. Accessed 22.2.2024.

158 Article 6 of Commission Regulation (EC) No 1010/2009 of 22 October 2009 laying down detailed 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. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02009R1010-20200327. Accessed 31.3.25.

159 Song, A. M., Scholtens, J., Barclay, K., Bush, S. R., et al. (2020) Collateral damage? Small-scale fisheries in the global fight against IUU fishing. Fish and Fisheries, 21, 831-843. https://doi.org/10.1111/faf.12462.

160 Article 6 of Commission Regulation (EC) No 1010/2009 of 22 October 2009 laying down detailed 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. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02009R1010-20200327. Accessed 31.3.25.

161 Annex IV of Commission Regulation (EC) No 1010/2009 of 22 October 2009 laying down detailed 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/?uri=CELEX%3A02009R1010-20200327. Accessed 31.3.25.

162 Hosch, G. & Clarke, S.C. (2025) Advancing the Crucial Notion of "Interoperability" in Catch Documentation Schemes. Fisheries Management and Ecology, 2025; 0:e, 12812. https://doi.org/10.1111/fme.12812.

163 Department of Agriculture, Fisheries and Forestry (2023) Measures to prevent the importation of illegal, unreported and unregulated seafood: draft report. https://haveyoursay.agriculture.gov.au/iuu-seafood-imports. Accessed: 6.12.24. Article 16 of Council Regulation (EC) No 1005/2008 of 29 September 2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing, amending Regulations (EEC) No 2847/93, (EC) No 1936/2001 and (EC) No 601/2004 and repealing Regulations (EC) No 1093/94 and (EC) No 1447/1999. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02008R1005-20240109. Accessed 31.3.25.

164 Article 16 of Council Regulation (EC) No 1005/2008 of 29 September 2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing, amending Regulations (EEC) No 2847/93, (EC) No 1936/2001 and (EC) No 601/2004 and repealing Regulations (EC) No 1093/94 and (EC) No 1447/1999. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02008R1005-20240109. Accessed 31.3.25.

165 EU IUU Coalition (2016) Risk Assessment and Verification of Catch Certificates under the EU IUU Regulation. https://www.iuuwatch.eu/wp-content/uploads/2016/07/Risk-Assessment-FINAL.pdf.

166 This data was obtained via an access to information request by the EU IUU Fishing Coalition. You can find the Member State Biennial Reports from 2012/13-2022/23 on the EU IUU Fishing Coalition's website: https://www.iuuwatch.eu/the-iuu-regulation/member-state-implementation/.

167 Specific focus on flag states that have been identified through the EU Carding System as having little or no MCS measures including inadequate control of fishing fleets and processing plants or a lack of effective vessel monitoring/record keeping/registration, for a full up to date list of the EU Carding decisions visit: https://www.iuuwatch.eu/the-iuu-regulation/eu-carding-decisions/.

168 Find NOAA Fisheries's Report on IUU Fishing, Bycatch, and Shark Catch here: https://www.fisheries.noaa.gov/international/international-affairs/report-iuu-fishing-bycatch-and-shark-catch.

169 Agreement on Port State Measures to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing, 22 November 2009, entered into force 5 June 2016, https://

www.fao.org/treaties/results/details/en/c/TRE-000003/. Accessed 2.4.25.

170 Cape Town Agreement of 2012: Consolidated text of the regulations annexed to the Torremolinos Protocol of 1993 relating to the Torremolinos International Convention for the Safety of Fishing Vessels, 1977, as modified by the Cape Town Agreement of 2012. https://wwwcdn.imo.org/localresources/en/About/Conventions/Documents/Consolidated%20text%20of%20the%20Agreement.pdf. Accessed 2.4.25.

171 Convention (no. 188) Concerning Work in the Fishing Sector, 14 June 2007, entered into force on 16 November 2017, https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C188. Accessed 2.4.25.

172 Agreement for the Implementation of the Provisions of the United Nations Convention on the Law of the Sea of 10 December 1982 relating to the Conservation and Management of Straddling Fish Stocks and Highly Migratory Fish Stocks (UN Fish Stocks Agreement), available at: https://www.un.org/depts/los/convention_agreements/convention_20years/1995FishStockAgreement_ATahindro.pdf. Accessed 14.10.25.

173 United Nations Convention on the Law of the Sea, 10 December 1982, entered into force on 16 November 1994, https://treaties.un.org/Pages/ViewDetailsIII.aspx?src=TREATY&mtdsg_no=XXI-6&chapter=21&Temp=mtdsg3&clang=_en. Accessed 2.4.25.

174 More information available at: https://sdgs.un.org/partnerships/national-plan-action-combat-deter-and-eliminate-illegal-unreported-and-unregulated#description. Accessed 14.10.25.

175 More information available at: https://commons.wmu.se/all_dissertations/2452/. Accessed 14.10.25.

176 More information available at: https://www.wto.org/english/tratop_e/rulesneg_e/fish_e/2001_ipoa_iuu.pdf. Accessed 14.10.25.

177 Article 31 of 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/?uri=OJ:L_202501522. Accessed 18.8.25.

178 Probst, W. N. (2019) How emerging data technologies can increase trust and transparency in fisheries. ICES Journal of Marine Science, 77, 1286-1294. https://doi.org/10.1093/icesjms/fsz036.

179 Yozell, S., Lewis, S., Kuruc, M., Gruber, C., et al. (2024). Workshop Summary Report: Reimagining the Seafood Import Monitoring Program, Workshop I. The Stimson Center, Washington D.C., USA. https://www.stimson.org/wp-content/uploads/2024/07/REPORT_ReimaginingSIMPWorkshop1StimsonFishWise.pdf.

180 Article 17 (6) of Council Regulation (EC) No 1005/2008 of 29 September 2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing, amending Regulations (EEC) No 2847/93, (EC) No 1936/2001 and (EC) No 601/2004 and repealing Regulations (EC) No 1093/94 and (EC) No 1447/1999. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02008R1005-20240109. Accessed 31.3.25.

181 Hosch, G. (2016) Design options for the development of tuna catch documentation schemes. FAO Fisheries and Aquaculture Technical Paper No 596. Rome, FAO. Available at: https://openknowledge.fao.org/items/9877e52d-7333-4db1-bd83-90853d6e713b.

182 Article 9 (1) of Council Regulation (EC) No 1005/2008 of 29 September 2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing, amending Regulations (EEC) No 2847/93, (EC) No 1936/2001 and (EC) No 601/2004 and repealing Regulations (EC) No 1093/94 and (EC) No 1447/1999. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02008R1005-20240109. Accessed 31.3.25.

183 EU IUU Fishing Coalition (2022) Water-tight? Assessing the effectiveness of EU controls to prevent illegal seafood imports. https://www.iuuwatch.eu/wp-content/uploads/2022/11/Member-States-Write-up-EN-1.pdf. Accessed 10.1.25.

184 Ibid.

185 Section 12:42 of the Code of Federal Regulations, 19 C.F.R. §§12.42-12.45. Customs Duties; Merchandise Produced By Convict, Forced, or Indentured Labor. Available at: https://www.ecfr.gov/current/title-19/chapter-I/part-12/subject-group-ECFR673f1b37a00878d?toc=1. Accessed 24.6.25.

186 Section 12:44 of the Code of Federal Regulations, 19 C.F.R. §§12.44 Customs Duties; Merchandise Produced By Convict, Forced, or Indentured Labor. Available at: https://www.ecfr.gov/current/title-19/chapter-I/part-12/subject-group-ECFR673f1b37a00878d?toc=1. Accessed 14.10.25.

187 Article 18 of Council Regulation (EC) No 1005/2008 of 29 September 2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing, amending Regulations (EEC) No 2847/93, (EC) No 1936/2001 and (EC) No 601/2004 and repealing Regulations (EC) No 1093/94 and (EC) No 1447/1999. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02008R1005-20240109. Accessed 31.3.25.

188 Article 44 of Council Regulation (EC) No 1005/2008 of 29 September 2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing, amending Regulations (EEC) No 2847/93, (EC) No 1936/2001 and (EC) No 601/2004 and repealing Regulations (EC) No 1093/94 and (EC) No 1447/1999. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02008R1005-20240109. Accessed 31.3.25.

189 Article 91a of Regulation (EU) 2023/2842 Of The European Parliament and of the Council of 22 November 2023 amending Council Regulation (EC) No 1224/2009, and amending Council Regulations (EC) No 1967/2006 and (EC) No 1005/2008 and Regulations (EU) 2016/1139, (EU) 2017/2403 and (EU) 2019/473 of the European Parliament and of the Council as regards fisheries control. Available at: https://eur-lex.europa.eu/eli/reg/2023/2842/oj/eng. Accessed 03.09.2025.

190 EU IUU Fishing Coalition (2022) Water-tight? Assessing the effectiveness of EU controls to prevent illegal seafood imports,. https://www.iuuwatch.eu/wp-content/uploads/2022/11/Member-States-Write-up-EN-1.pdf.

191 Bang, N. J. (2014) Casting a Wide Net to Catch the Big Fish: A Comprehensive Initiative to Reduce Human Trafficking in the Global Seafood Chain. University of Pennsylvania Journal of Law and Social Change, 17, 221-

255. https://scholarship.law.upenn.edu/jlasc/vol17/iss3/1.

192 Hosch, G. (2016) Design options for the development of tuna catch documentation schemes. FAO Fisheries and Aquaculture Technical Paper No 596. Rome, FAO. Available at: https://openknowledge.fao.org/items/9877e52d-7333-4db1-bd83-90853d6e713b.

193 At this stage, States should consider any legal barriers to data-sharing agreements across agencies and determine whether any new or amended legislation is needed to support data-sharing efforts.

194 Gruber, C., Schlieman, L., Fritzhand, N., & Yozell, S. (2023) Traceability, Targeting, and Transparency in U.S. Seafood Trade Programming. The Stimson Center, Washington D.C., USA. https://www.stimson.org/wp-content/uploads/2023/12/Seafood-Trade-Report_12.19.23.pdf. Accessed 25.2.25.

195 Further information about the U.S. Interagency Working Group on IUU Fishing is available at: https://www.fisheries.noaa.gov/national/international-affairs/us-interagency-working-group-iuu-fishing. Accessed 25.2.25.

196 Article 94 of the United Nations Convention on the Law of the Sea. https://www.un.org/Depts/los/convention_agreements/texts/unclos/part7.htm.

197 Hosch, G. (2016) Design options for the development of tuna catch documentation schemes. FAO Fisheries and Aquaculture Technical Paper No 596. Rome, FAO. Available at: https://openknowledge.fao.org/items/9877e52d-7333-4db1-bd83-90853d6e713b.

198 Itad (2025) 'Research and Evaluation of Import Control Rules Designed to Reduce Illegal, Unregulated, and Unreported Fishing.' Brighton: Itad. https://www.itad.com/wp-content/uploads/2025/05/Walton-Family-Foundation-ICR-IUU-report.pdf. Accessed 2.4.25.

199 The Coalition for Fisheries Transparency (2024) A Global Charter for Fisheries Transparency. A framework for collaboration, justice, and sustainability. https://fisheriestransparency.net/wp-content/uploads/2024/09/2024-Charter-Report-EN.pdf. Accessed 7.1.2025.

200 More details can be found on the Global Charter for Fisheries Transparency 10 Principles at: https://fisheriestransparency.net/wp-content/uploads/2024/09/2024-Charter-Report-EN.pdf

201 The Nature Conservancy's Tuna Transparency Pledge, more information available at: https://www.nature.org/en-us/what-we-do/our-priorities/provide-food-and-water-sustainably/food-and-water-stories/eyes-on-tuna/. Accessed 8.7.25.

202 van Helmond, A. T. M., Mortensen, L. O., Plet-Hansen, K. S., Ulrich, C., et al. (2019) Electronic monitoring in fisheries: Lessons from global experiences and future opportunities. Fish and Fisheries, 21, 162-189. https://doi.org/10.1111/faf.12425.

203 Pew Trusts (2023) 'Ownership of Fishing Companies, Vessels Needs Greater Transparency and Accountability'. https://www.pewtrusts.org/en/research-and-analysis/issue-briefs/2023/10/ownership-of-fishing-companies-vessels-need--greater-transparency-and-accountability. Accessed 14.1.25.

204 UK Fixed Quota Allocation Register, https://www.fqaregister.service.gov.uk/browse#tabs=1. Accessed 14.1.25.

205 Council Regulation (EC) No 1005/2008 of 29 September 2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing, amending Regulations (EEC) No 2847/93, (EC) No 1936/2001 and (EC) No 601/2004 and repealing Regulations (EC) No 1093/94 and (EC) No 1447/1999. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02008R1005-20240109. Accessed 31.3.25.

206 Itad (2025) 'Research and Evaluation of Import Control Rules Designed to Reduce Illegal, Unregulated, and Unreported Fishing.' Brighton: Itad. https://www.itad.com/wp-content/uploads/2025/05/Walton-Family-Foundation-ICR-IUU-report.pdf. Accessed 2.4.25.

207 EU IUU Fishing Coalition (2022) Driving Improvements in Fisheries Governance Globally: Impact of the EU IUU Carding Scheme on Belize, Guinea, Solomon Islands and Thailand. https://www.iuuwatch.eu/wp-content/uploads/2022/03/2022-EU-IUU-Coalition-Carding-Study.pdf. Accessed 14.1.25.

208 Itad (2025) 'Research and Evaluation of Import Control Rules Designed to Reduce Illegal, Unregulated, and Unreported Fishing.' Brighton: Itad. https://www.itad.com/wp-content/uploads/2025/05/Walton-Family-Foundation-ICR-IUU-report.pdf. Accessed 2.4.25.

209 Article 31 of the EU IUU Regulation enables the EU's to identify countries for failing to cooperate in the fight against IUU fishing. Article 18 then requires EU Member States to reject a catch certificate that has been validated by the authorities of a flag State identified as a non-cooperating State in accordance with Article 31. Article 38 also specifies that 'importation into the Community of fishery products caught by fishing vessels flying the flag of such countries shall be prohibited, and accordingly catch certificates accompanying such products shall not be accepted'.

210 Department of Agriculture, Fisheries and Forestry (2023) Measures to prevent the importation of illegal, unreported and unregulated seafood: draft report. https://haveyoursay.agriculture.gov.au/iuu-seafood-imports. Accessed: 06.12.2024.

211 Department of Agriculture, Fisheries and Forestry. (2023). Measures to prevent the importation of illegal, unreported and unregulated seafood: draft report. https://haveyoursay.agriculture.gov.au/iuu-seafood-imports. Accessed: 06.12.2024.

212 Article 55 of the Council Regulation (EC) No 1005/2008 of 29 September 2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing, amending Regulations (EEC) No 2847/93, (EC) No 1936/2001 and (EC) No 601/2004 and repealing Regulations (EC) No 1093/94 and (EC) No 1447/1999. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32008R1005. Accessed 31.3.25.

213 You can find the Member State Biennial Reports from 2012/13-2022/23 on the EU IUU Fishing Coalition's website: https://www.iuuwatch.eu/the-iuu-regulation/member-state-implementation/.

214 Section 109 of the Illegal Fishing And Forced Labor Prevention Act: Report on Seafood Import Monitoring. https://www.govinfo.gov/content/pkg/CRPT-117hrpt674/html/CRPT-117hrpt674-pt1.htm. Accessed 26.2.25.

215 EU IUU Fishing Coalition (2022) Water-tight? Assessing the effectiveness of EU controls to prevent illegal seafood imports,. https://www.iuuwatch.eu/wp-content/uploads/2022/11/Member-States-Write-up-EN-1.pdf.

216 EU IUU Fishing Coalition (2022) Water-tight? Assessing the effectiveness of EU controls to prevent illegal seafood

imports,. https://www.iuuwatch.eu/wp-content/uploads/2022/11/Member-States-Write-up-EN-1.pdf.

217 Hosch, G. (2016) Design options for the development of tuna catch documentation schemes. FAO Fisheries and Aquaculture Technical Paper No 596. Rome, FAO. Available at: https://openknowledge.fao.org/items/9877e52d-7333-4db1-bd83-90853d6e713b.

218 Department of Agriculture, Fisheries and Forestry. (2023). Measures to prevent the importation of illegal, unreported and unregulated seafood: draft report. https://haveyoursay.agriculture.gov.au/iuu-seafood-imports. Accessed: 06.12.2024.

219 Ministry of Agriculture, Forestry and Fisheries of Japan (MAFF). TECHNICAL NOTE on Class II Aquatic Animals and Plants Ver 2.0. (2022). Available at: https://www.jfa.maff.go.jp/220614.html. Accessed 15.1.25.

220 IUU Forum Japan. Reactive Statement on "Actions to Further Promote the Proper Distributions of Seafoods," Released from the Fisheries Agency of Japan Following the First Meeting to Review Japanese Measures Against IUU Fishing. Available in Japanese at: https://iuuwatch.jp/wp/wp-content/uploads/2025/02/joint_statement_20250130-j.pdf.

221 Department of Agriculture, Fisheries and Forestry. (2023). Measures to prevent the importation of illegal, unreported and unregulated seafood: draft report. https://haveyoursay.agriculture.gov.au/iuu-seafood-imports. Accessed: 06.12.2024.

222 NOAA. (2024). Action Plan to Improve the US Seafood Import Monitoring Program. https://www.fisheries.noaa.gov/s3/2024-11/SIMP-Action-Plan_final.pdf. Accessed 15.1.25.

223 Hosch, G. (2016). Design options for the development of tuna catch documentation schemes. FAO Fisheries and Aquaculture Technical Paper No. 596. Rome, FAO. Available at: https://openknowledge.fao.org/items/9877e52d-7333-4db1-bd83-90853d6e713b.

224 FAO (2017) Voluntary Guidelines for Catch Documentation Schemes. Available at: https://openknowledge.fao.org/handle/20.500.14283/i8076en. Accessed 14.1.25.

225 EU IUU Fishing Coalition (2020) A comparative study of key data elements in import control schemes aimed at tackling illegal, unreported and unregulated fishing in the top three seafood markets: the European Union, the United States and Japan. Accessible at https://www.iuuwatch.eu/resources/#import. Accessed 16.1.25.

226 FAO (2022) Understanding and implementing catch documentation schemes - A guide for national authorities. FAO Technical Guidelines for Responsible Fisheries No. 14. https://doi.org/10.4060/cb8243en.

227 EU IUU Fishing Coalition (2022) Water-tight? Assessing the effectiveness of EU controls to prevent illegal seafood imports. https://www.iuuwatch.eu/wp-content/uploads/2022/11/Member-States-Write-up-EN-1.pdf.

228 Department of Agriculture, Fisheries and Forestry (2023) Measures to prevent the importation of illegal, unreported and unregulated seafood: draft report. https://haveyoursay.agriculture.gov.au/iuu-seafood-imports. Accessed: 6.12.24.

229 Gruber, C., Schlieman, L., Fritzhand, N., & Yozell, S. (2023) Traceability, Targeting, and Transparency in U.S. Seafood Trade Programming. The Stimson Center, Washington D.C., USA. https://www.stimson.org/wp-content/uploads/2023/12/Seafood-Trade-Report_12.19.23.pdf.

230 Hosch, G. & Clarke, S.C. (2025) Advancing the crucial notion of "interoperability" in catch documentation schemes. Fisheries Management and Ecology, 2025; 0:e, 12812. https://doi.org/10.1111/fme.12812.

231 Robertson, L., Hosch, G., Wilcox, C., Domiguez-Martinez, R., M. et al. (2025). A New Seafood Import Policy for Nations to Combat Illegal Fishing. Conservation Letters, 18, e13091. https://doi.org/10.1111/conl.13091.

232 Available at: https://eur-lex.europa.eu/eli/reg/2023/2842/oj/eng. Accessed 31.3.25.

233 Available at: https://media.fisheries.noaa.gov/dam-migration/nmfs_modelcatchformrev.pdf. Accessed 31.3.25.

234 Available at: https://www.jfa.maff.go.jp/attach/pdf/220614-3.pdf. Accessed 31.3.25.

235 As detailed in Annex II to Regulation (EU) 2023/2842 of the European Parliament and of the Council of 22 November 2023 amending Council Regulation (EC) No 1224/2009, and amending Council Regulations (EC) No 1967/2006 and (EC) No 1005/2008 and Regulations (EU) 2016/1139, (EU) 2017/2403 and (EU) 2019/473 of the European Parliament and of the Council as regards fisheries control. Available at: https://eur-lex.europa.eu/eli/reg/2023/2842/oj/eng. Accessed 14.10.25.

236 Available at: https://media.fisheries.noaa.gov/dam-migration/nmfs_modelcatchformrev.pdf. Accessed 31.3.25.

237 As outlined in Attachment 7 for Class II Aquatic Animals and Plants under Article 11 of Act on Ensuring the Proper Domestic Distribution and Importation of Specified Aquatic Animals and Plants. Available at: https://www.jfa.maff.go.jp/attach/pdf/220614-3.pdf. Accessed 31.3.25.

238 Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02008R1005-20240109. Accessed 31.3.25.

239 Available at: https://media.fisheries.noaa.gov/dam-migration/nmfs_modelcatchformrev.pdf. Accessed 31.3.25.

240 Available at: https://www.jfa.maff.go.jp/attach/pdf/220614-3.pdf. Accessed 31.3.25.

241 Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02009R1010-20200327. Accessed 31.3.25.

242 Available at: https://media.fisheries.noaa.gov/dam-migration/nmfs_modelcatchformrev.pdf. Accessed 31.3.25.

243 Available at: https://www.jfa.maff.go.jp/attach/pdf/220614-3.pdf. Accessed 31.3.25.

244 The Coalition for Fisheries Transparency (2024) A Global Charter for Fisheries Transparency. A framework for collaboration, justice, and sustainability. https://fisheriestransparency.net/wp-content/uploads/2024/09/2024-Charter-Report-EN.pdf. Accessed 7.1.2025.

For more information, contact:

Thomas Walsh, EU IUU Fishing Coalition Coordinator, tom.walsh@iuuwatch.eu
Penelope Kyritsis, U.S. IUU Fishing and Labor Rights Coalition Coordinator, hello@penelopekyritsis.com
Yukiko Kuwata, IUU Forum Japan Coordinator, yukiko.kuwata@seafoodlegacy.com

---

For more news, updates and documents supporting the efforts to combat IUU fishing globally,
visit: **www.iuuwatch.eu** or contact: **info@iuuwatch.eu**
visit: **iuuwatch.jp/en/** or contact: **info@iuuwatch.jp**
visit: **www.linkedin.com/company/us-iuu-fishing-labor-rights-coalition?trk=public_post_feed-actor-name**

Cite this document as: EU IUU Fishing Coalition, US IUU Fishing and Labor Rights Coalition, and IUU Forum Japan (2025) *The Fisheries Import Control Scheme Handbook*.

EU IUU FISHING COALITION

IUU FORUM JAPAN

UNITED STATES IUU Fishing & Labor Rights COALITION

Our members include: