

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

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Acronyms and abbreviations

ASFIS	Aquatic Sciences and Fisheries Information System
CATCH	European Commission IT system for catch certificates
CCAMLR	Convention for the Conservation of Antarctic Marine Living Resources
CC	Catch certificate
CCS	Catch certification scheme
CCSBT	Commission for the Conservation of Southern Bluefin Tuna
CDS	Catch documentation scheme
CMMs	Conservation and management measures
eBCD	Electronic Bluefin Tuna Catch Document
EEZ	Exclusive Economic Zone
EM	Electronic Monitoring
EU	European Union
EU IUU Regulation	Council Regulation (EC) No. 1005/2008 of 29 September 2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing (OJ L 286, 29. 10.2008)
FAO	Food and Agriculture Organization of the United Nations
ICCAT	International Commission for the Conservation of Atlantic Tunas
ICS	Import control scheme(s)
IFTP	International Fisheries Trade Permit
IMO	International Maritime Organization
ISO	International Organization for Standardization
IOTC	Indian Ocean Tuna Commission
IRCS	International Radio Call Sign
IUU	Illegal, unreported and unregulated fishing
KDE	Key data element
MOF	Korean Ministry of Oceans and Fisheries
NMFS	National Marine Fisheries Service (informally known as NOAA Fisheries)
NOAA	National Oceanic and Atmospheric Administration
RFMO	Regional Fisheries Management Organisation
SIMP	Seafood Import Monitoring Program
STS	Seafood Traceability System
US	United States of America
UNCLOS	United Nations Convention on the Law of the Sea
UVI	Unique Vessel Identifier
VGCDs	FAO Voluntary Guidelines for Catch Documentation Schemes

1. Executive summary

The Environmental Justice Foundation, Oceana, The Nature Conservancy, The Pew Charitable Trusts and WWF are working together in a coalition (the 'EU IUU Fishing Coalition') to improve global fisheries governance and transparency to end illegal, unreported and unregulated (IUU) fishing, including through the adoption and implementation of ambitious and harmonised import control schemes.

Import control schemes have been adopted by some market States and Regional Fisheries Management Organisations (RFMOs) to monitor seafood imports and stop IUU fishing. These import controls often take the form of Catch Documentation Schemes (CDS), where information on a consignment is recorded throughout the supply chain.



Robust import controls are vital for understanding the origin of imported seafood, particularly in the top seafood importing States which handle the largest volumes of fishery imports. This study examines the current systems in place in four major markets that since 2020 made up approximately 60% of the total value of world imports of fish and fish products:¹ the European Union (EU), the United States of America (US), Japan and the Republic of Korea (South Korea). **In this study, the EU IUU Fishing Coalition presents the 17 key data elements (KDEs) that we consider fundamental for achieving a robust baseline**, based on best practice across the sector and literature. These include, but are not limited to, vessel flag, catch area, International Maritime Organization (IMO) number, fishing authorisations, transshipment declarations, unloading ports and catching method. A comparative analysis of data requirements in existing import control schemes is then provided, followed by conclusions and recommendations. **The analysis presented in this report is an update of the EU IUU Fishing Coalition’s 2020 analysis comparing the import controls in place in the EU, the US and Japan. It has been expanded to include South Korea.² This analysis also briefly discusses the current import controls in place in the United Kingdom.**

Summary table of the 17 essential key data elements (KDEs) recommended for catch documentation schemes

Key data element (KDEs)	
Who	<ul style="list-style-type: none"> Vessel name Unique vessel identifier (IMO number) Vessel flag International Radio Call Sign (IRCS) Information on exporter/re-exporter Identity of import company
What	<ul style="list-style-type: none"> Product type Species name – ASFIS 3-Alpha Code Estimated live weight (kg) Processed weight (kg) Transshipment: Declaration and authorisation of transshipment at sea, IMO number and vessel master information
When	<ul style="list-style-type: none"> Event date
Where	<ul style="list-style-type: none"> Catch area (better defined with a clear distinction between the EEZ and the high seas) Authorisation to fish Port of landing Processing location
How	<ul style="list-style-type: none"> Fishing gear type or catch method

1 FAO (2022). The State of the World Fisheries and Aquaculture (SOFIA) 2022. Available at: <https://www.fao.org/documents/card/en?details=cc0461en>. p.94-95. Accessed 1.5.2024.

2 EJF, Oceana, The Nature Conservancy, The Pew Charitable Trusts and WWF. (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/2020/11/CDS-2020-report-EN-WEB-Nov-2020.pdf>. Accessed 10.5.2024.

In 2008, the EU introduced a unilateral CDS — the Catch Certification Scheme (CCS) — through the adoption of the EU IUU Regulation.³ It covers all marine wild caught fish (with some exemptions)⁴ traded by non-EU countries into the EU market. The US introduced its own import control scheme known as the Seafood Import Monitoring Program (SIMP) in 2016, covering 13 types of seafood identified as the most vulnerable to IUU fishing and seafood fraud.⁵ In December 2022, Japan also established a CDS⁶ based on the EU CCS, which currently applies to imported squid and cuttlefish, Pacific saury, mackerel and sardine.⁷ Finally, in South Korea, the Ministry of Oceans and Fisheries (MOF) adopted its own CDS in 2017 targeting three species, namely bobo croaker, longneck croakers and Pacific saury.⁸ As more market States consider adopting their own unilateral schemes, most notably Australia,⁹ it is a key time to assess the comprehensiveness and alignment of existing systems.

In the comparison between the EU, US, Japan and South Korea's requirements against the 17 recommended KDEs,¹⁰ the EU currently requires 14 out of these 17 KDEs (82%). As of 10 January 2026, the EU will require 16 of the 17 KDEs (94%) following amendments made to the EU's IUU Regulation, leaving one outstanding KDE: the port of landing. The US currently asks for 12 out of the 17 KDEs (71%). The two KDEs not required by the US are international radio call sign (IRCS) and estimated live weight. Furthermore, three KDEs need strengthening and do not currently meet the Coalition's KDE standards: IMO number, transshipment information and authorisation to fish. Japan currently requests 12 out of the 17 recommended KDEs (76%) although the port of landing is not requested by Japan and three KDEs need strengthening: IMO number, ICRS and species name. As of October 2024, South Korea requires all 17 recommended KDEs (100%) under its catch documentation scheme for imported Pacific saury, bobo croakers and longneck croakers caught by vessels over 20 tons.¹¹

Since the previous version of this report, there has been an increase in global action to establish stronger unilateral schemes by the market States investigated in this report. Although there are notable improvements in the EU, Japan and South Korea CDS systems, the EU IUU Fishing Coalition sees opportunities for more KDEs to be better aligned between the EU, the US, Japan and South Korea thus promoting information sharing and verifications between the different systems.¹²

It is important to remember that the lack of standardisation and harmonisation is fundamentally impacting the ability of the systems to collectively drive change at sea. To address this, the EU IUU Fishing Coalition also outlines five operational best practices that systems should incorporate, alongside the 17 KDEs. Currently there are major discrepancies in the species covered and risk assessments of existing schemes, leaving the systems vulnerable to loopholes and oversights of high-risk seafood imports. Market States should adopt import controls that aim to expand to cover all species as soon as feasible. In addition, they should adopt electronic systems for greater efficiency, such as the EU's CATCH IT system,¹³ and independent observations for verifications, such as using electronic monitoring (EM).¹⁴ Finally, there should be much stronger risk assessment criteria applied by market States, where evidentiary requirements increase with risk.

There is a risk of a proliferation of non-harmonised unilateral trade instruments to combat IUU fishing, which could lead to a poor understanding of CDS requirements across multiple systems. Additionally, there may be design flaws or loopholes which pass undetected and are then repeated in newly

3 Council Regulation (EC) No. 1005/2008 of 29 September 2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing (OJ L 286, 29. 10.2008).

4 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. Please see Annex 1 for the full list of species covered.

5 Further information on SIMP is available at: <https://www.fisheries.noaa.gov/international/international-affairs/seafood-import-monitoring-program>. Accessed 10.5.2024.

6 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.

7 TECHNICAL NOTE on Class II Aquatic Animals and Plants Ver 2.0 <https://www.jfa.maff.go.jp/attach/pdf/220614-3.pdf>. Accessed 22.2.2024.

8 Ibid.

9 Further information and all relevant documents are available on the Department of Agriculture, Fisheries and Forestry website: <https://haveyoursay.agriculture.gov.au/iuu-seafood-imports>. Accessed 1.5.2024.

10 Ibid.

11 Korea Distant Water Fisheries Development Act Article 14, Enforcement Rule Article 23.1(3) <https://law.go.kr/lsLinkCommonInfo.do?lspttninfSeq=78979&chrClsCd=010202>. Accessed 25.10.2024

12 This text was updated – October 2020.

13 Starting from 9 January 2026, EU importers must use the IT tool CATCH to submit catch certificates for fishery products imported into the EU market. CATCH aims to simplify and speed up the administrative process by offering a digital and paperless workflow. CATCH will allow for the computerised submission, handling, storage, management and exchange of information, data and documents necessary for the performance of checks, risk management, verifications and control. Further information is available at: https://oceans-and-fisheries.ec.europa.eu/fisheries/rules/enforcing-rules/control-regulation_en. Accessed 1.5.2024.

14 Electronic Monitoring (EM) is the use of on-board video cameras, sensors, and GPS, and is a vital tool used to improve fisheries transparency and transform large-scale fisheries across the globe. Further information is available at: <https://www.nature.org/en-us/what-we-do/our-priorities/provide-food-and-water-sustainably/food-and-water-stories/fishing-for-better-data/>. Accessed 24.2.2024.

established systems. For fishers and supply chain actors targeting multiple markets, the costs of complying could be considerable. By adopting the 17 KDEs in CDSs and the operational best practices recommended by the EU IUU Fishing Coalition, global market States can harmonise systems, strengthen verifications and eliminate pathways for IUU products to reach global markets. In addition, for species that are managed by a Regional Fisheries Management Organisation we urge States to adopt a binding CDS system for that specific RFMO as this is the most efficient way to establish a harmonised system.



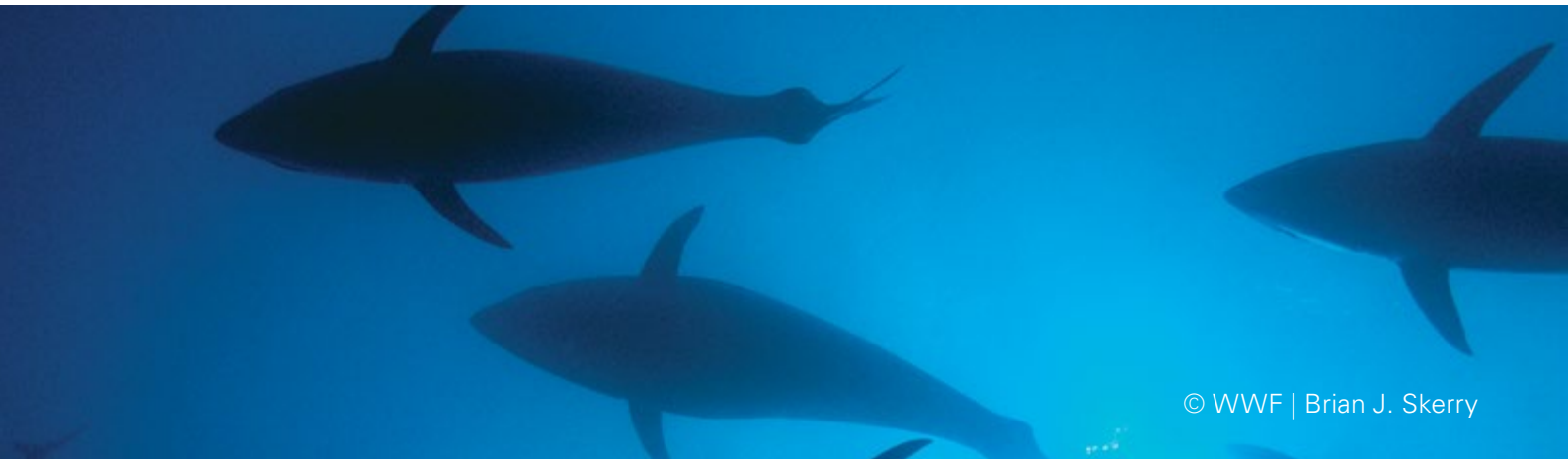
2. Introduction

Illegal, unreported and unregulated (IUU) fishing refers to activities that contravene national laws and regulations, the conservation and management measures of Regional Fishery Management Organisations (RFMOs) and, where relevant, international law. Behaviours include activities such as fishing without a valid licence, misreporting catch data, falsifying or concealing a fishing vessel's identity or itinerary and obstructing the work of inspectors or enforcers. IUU fishing is prolific in many fisheries worldwide and it has been shown that the weaker the governance of fisheries imports in a country, the more likely it is that illegal fish and fishery products will enter the market.¹⁵ Specifically, critical stages in the value chain from the point of capture to the final point of importation are subject to weaknesses.

To avoid IUU fishing products entering the market, traceability systems called import control schemes (ICS) have been established over the last ten years to address inefficiencies and gaps in the chain of custody. Furthermore, catch certificates (CCs) embedded in ICS can be used for reporting and recordkeeping. These tools are market-related measures that help to trace fish and fisheries products from harvesting, unloading, transportation and processing to the end market.

Key trade-related measures to combat IUU fishing fall into two distinct categories: trade restrictive measures and catch certification schemes (CCS). Trade restrictive measures are sometimes referred to as 'trade sanctions' and are enacted by one or more market States. Catch documentation schemes (CDS) are a specific variant of CCS.

ICS can be unilateral when adopted by a single market State, or multilateral when implemented at the level of Regional Fisheries Management Organisations (RFMOs). The three major unilateral¹⁶ ICS in existence today include the EU's IUU Regulation and the integrated CDS (also known as the EU CCS), the US Seafood Import Monitoring Program (SIMP)¹⁷ and Japan's *Act on Ensuring the Proper Domestic Distribution and Importation of Specified Aquatic Animals and Plants 2022*.¹⁸ Additionally, South Korea's CDS, under the *Distant Water Fisheries Development Act*,¹⁹ was, in October 2024, expanded to include more comprehensive documentation (Key Data Element) requirements for imported Pacific saury, bobo croaker and longneck croaker.²⁰ Multilateral RFMO schemes regulate how resources may be extracted from a given fishery, as well as under what conditions they may enter international trade, and must be followed and complied with by any contracting parties fishing, processing or trading resources within the RFMO convention area.



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

16 Established by a single country or union of countries, which regulate and track catches entering the market.

17 Further information on the United States Seafood Import Monitoring Program (SIMP) is available at: <https://www.fisheries.noaa.gov/international/international-affairs/seafood-import-monitoring-program>. Accessed 2.10.2024.

18 Further information on Japan's Act on Ensuring the Proper Domestic Distribution and Importation of Specified Aquatic Animals and Plants is available at: <https://www.jfa.maff.go.jp/220614.html>. Accessed 1.5.2024.

19 South Korea's Distant Water Fisheries Development Act is available in English at: <https://law.go.kr/engLsSc.do?menuId=1&subMenuId=21&tabMenuId=117&query=원양산업#>.

20 At the OurOcean 2024 Conference in Athens, Greece, Mr Ko. Kyung-Man (Director of Distant Water Fisheries Division, Ministry of Oceans and Fisheries) announced expansion of the Republic of Korea's existing catch documentation scheme and internal intelligence confirms that KDE expansion will be in line with the recommendations made by the EU IUU Fishing Coalition in this report. Further information is available at: The Ministry of Oceans and Fisheries Decree No. 697, October 25, 2024, Partially Revised. <https://law.go.kr/lisByllInfoPLinkR.do?lsiSeq=266147&lsNm=%EC%9B%90%EC%96%91%EC%82%B0%EC%97%85%EB%B0%9C%EC%A0%84%EB%B2%95+%EC%8B%9C%ED%96%89%EA%B7%9C%EC%B9%99&bylNo=0014&bylBrNo=02&bylCls=BF&bylEFYd=20241025&bylEFYdYn=Y>. Accessed 21.1.25.

ICS help confirm the legality of products harvested and unloaded from a fishing vessel, ensuring that the seafood was harvested in a manner consistent with relevant national, regional and international conservation and management measures (CMMs).²¹ With complete and verifiable traceability, such schemes have proven helpful to reduce the trade of illegally caught seafood.²²

However, as more countries and RFMOs develop their own systems, it is evident that a harmonised, coordinated approach does not currently exist. This raises concerns about future trade burdens, disjointed management and inability to share and cross-reference information. In recognition of this, and in response to a request by the thirty-first United Nations Food and Agriculture Organization (FAO) Committee on Fisheries (COFI) held in Rome on 9-13 June 2014, the FAO developed Voluntary Guidelines for Catch Documentation Schemes (VGCDs), which were officially adopted by the FAO Conference at its fortieth session in July 2017.²³

FAO Voluntary Guidelines for Catch Documentation Schemes (VGCDs)

The FAO's VGCDs, include an annex with a limited set of eight proposed core information elements, described as follows:

- Unique and secure identification of document.
- Information on catch and landing such as fishing vessel or vessel group, species, catch area, landing information etc.
- Information on transshipment at sea or in port such as donor and receiving vessel, area, date.
- Description of exported product(s) such as product type, weight; issuing validating authority, including contact details.
- Exporter identity and contact details.
- Importer identity and contact details.
- Export and transport details.

They also include additional core information elements unique to re-export and processing:

- Link to originating CC.
- Description of imported, re-exported or processed products.
- Issuing authority validating the re-export or processing statement, including contact details.

In early 2020, the Global Dialogue on Seafood Traceability (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 1.0 to track seafood products from point of origin to point of sale.²⁴ This major business platform comprises more than 60 member companies, including many of the most important retailers, brands and mid-supply chain processors in the sector. The GDST standards identify 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 standards govern the technical formats and nomenclatures for sharing data among interoperable traceability systems. These standards are a critical step forward in the fight against illegal fishing and unethical labour practices. These standards are continuously evolving through a participatory, multi-stakeholder dialogue and despite being developed entirely separately from the present analysis, the GDST standards are nearly entirely aligned with the key data element (KDE) recommendations in this report.

²¹ Report of the Expert Consultation on Catch Documentation Schemes, FAO Fisheries and Aquaculture Report No. 1120, July 2015.

²² 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).

²³ FAO (2017). Voluntary Guidelines for Catch Documentation Schemes. Available at: <https://www.fao.org/iuu-fishing/international-framework/voluntary-guidelines-for-catch-documentation-schemes/en/>. Accessed 10.5.2024.

²⁴ Further information about the GDST Standard is available at: <https://thegdst.org/resources/standard/>

3. Overview of current import control schemes in top seafood market States

3.1 The European Union

The EU is the largest importer of seafood in the world in value terms and the second biggest by volume. In 2023, the EU imported fisheries and aquaculture products with a value of EUR 30.1 billion, mainly consisting of salmon, cod, shrimp and tuna. Marine captures consisted of 75% of the EU's seafood imports. The main EU suppliers (in terms of volume) are Norway, Morocco, China, the United Kingdom, Ecuador and Iceland.²⁵

The EU introduced a CCS in 2008 through the EU IUU Regulation, which entered into force in January 2010.²⁶ The EU CCS aims to ensure that products originating from IUU fishing activities are prevented from entering the EU market. Under this CCS, all marine wild caught fish (with some exemptions)²⁷ traded by non-EU countries into the EU market must be accompanied by CCs.²⁸ Catches from EU fishing vessels – except for the products listed in Annex 1 – are also subject to the validation of CCs by competent EU Member State authorities prior to exportation, if required by the non-EU country of destination.

The scheme applies to all unprocessed and processed products imported into the EU that were caught by non-EU flagged fishing vessels. Information on import documents are provided by the operators responsible for activities of fishing vessels (e.g. master of fishing vessel), processing and export or by their representative. It then must be validated by the competent authority/ies of the flag State – i.e. the country under which the vessel is registered – certifying that the products imported were caught in compliance with national and international fishing laws and conservation and management measures (CMMs). At the point of import into the EU, Member States are required to verify that fish and seafood products accompanied by CCs are of legal origin according to a risk-based approach.

The EU IUU Fishing Coalition has been advocating for digitisation of the catch certification process, in accordance with Articles 12.4 and 20.4 of the EU IUU Regulation.²⁹ In May 2019, the European Commission announced the launch of its new voluntary IT system for CCs, called 'CATCH'.³⁰ At the time of writing, this system is used on a voluntary basis by EU Member States and their national operators. However, the use of CATCH will become legally binding in January 2026, in accordance with the revision of the EU's IUU Regulation, which entered into force in January 2024.³¹ CATCH aims to provide a single database for EU Member States to use, allowing real-time monitoring of import documentation controls. The first version of this system will include the CC, the processing statement and the importer declaration. CATCH should help Member States detect suspected fraud and abuse of the paper-based version, simplifying and speeding-up controls at the EU border by reducing the administrative burden of import authorities. It also intends to promote fairness and consistency between Member States in their efforts to keep the EU market free of IUU fisheries products, by ensuring that what is rejected in one entry point cannot enter the EU in another.

25 European Market Observatory for Fisheries and Aquaculture. (2024) The EU Fish Market 2024 Edition. Available at: <https://eumofa.eu/market-analysis>. Accessed 13.12.2024.

26 Council Regulation (EC) No 1005/2008 of 29 September 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%3A02008R1005-20240109>. Accessed 1.5.2024.

27 See Annex for a list of products excluded from the EU catch certification scheme.

28 EU vessels landing product directly into EU ports are only required to produce a certificate if the product is destined for re-importation following a period in a non-EU country (e.g. for processing).

29 EU IUU Fishing Coalition (2016). Modernisation of the EU IUU Regulation Catch Certificate System; EU IUU Fishing Coalition (2017). Improving performance in the fight against illegal, unreported and unregulated (IUU) fishing.

30 Speech by Commissioner Vella: Launch of the EU's electronic Catch Documentation Scheme (CATCH), Seafood Expo, Brussels, 7 May 2019, https://ec.europa.eu/commission/commissioners/2014-2019/vella/announcements/speech-commissioner-vella-launch-eus-electronic-catch-documentation-scheme-catch-seafood-expo_en.

31 Council Regulation (EC) No 1005/2008 of 29 September 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%3A02008R1005-20240109>. Accessed 1.5.2024. https://oceans-and-fisheries.ec.europa.eu/news/eu-fisheries-control-system-gets-major-revamp-2024-01-09_en

Box 1: The United Kingdom

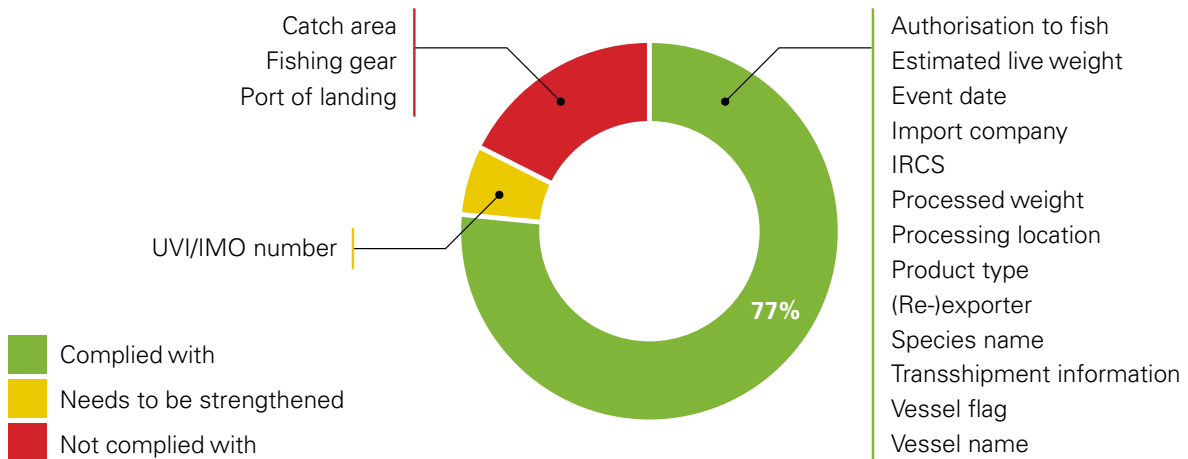
Following the United Kingdom's (UK) withdrawal from the EU,³² the UK has retained the EU IUU Regulation (now known as the 'UK IUU Regulation').³³ The use of catch certificates is mandated for all marine wild caught fish, with some exceptions, as is the case in the EU.

The UK currently requires 13 of the 17 KDEs (76%) recommended in this report. One KDE requires strengthening:

- IMO number is currently only required "if issued" by the flag State, IMO numbers should be a mandatory requirement in line with the 2017 IMO Resolution.

Three KDEs are not included:

- Catch area
- Port of landing
- Fishing gear type or catching method



In accordance with the UK IUU Regulation, the UK is advised to perform documentary checks of CCs and request verification when there is a risk of IUU fishing or concerns about the authenticity of the CC. A third country is required to confirm the accuracy and validity of the CC. The UK also maintains trade restrictions on countries that were 'red carded' under the EU carding system at the time of EU exit, including Cambodia, Comoros and Saint Vincent and the Grenadines.³⁴

The EU IUU Fishing Coalition recommends that the UK revises its current IUU regulations to bring them in line with the EU, at minimum.³⁵ This would aid future exports with this market, strengthen legislation to prevent IUU products from entering the UK market and prevent the UK from falling behind its global trade partners.

³² European Union (Withdrawal) Act 2018. Available at: <https://www.legislation.gov.uk/ukpga/2018/16/contents/enacted/data.htm>. Accessed 12.12.2024.

³³ Council Regulation (EC) No 1005/2008 of 29 September 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%3A02008R1005-20240109>. Accessed 1.5.2024.

³⁴ Department for Environment, Food & Rural Affairs (2020) Importing or moving fish to the UK. <https://www.gov.uk/guidance/importing-or-moving-fish-to-the-uk>. Accessed 2.12.2024.

³⁵ Further information on the UK's IUU legislation is available at: <https://www.gov.uk/government/publications/fishing-regulations-the-blue-book/section-d-illegal-unreported-and-unregulated-iuu-legislation>. Accessed 24.2.2024.



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3.2 The United States

The US is the second largest seafood importer in the world, having imported over 3.3 million tonnes of seafood valued at more than USD 30 billion in 2022, with popular imports including shrimp, salmon, catfish and tilapia.³⁶ The US introduced its own import control scheme, SIMP, in 2016. SIMP establishes reporting and record-keeping requirements³⁷ for imports of seafood products for the 13 types of seafood identified as the most vulnerable to IUU fishing and/or seafood fraud.³⁸ The National Oceanic and Atmospheric Administration (NOAA) Fisheries requires importers to hold an annually-renewable International Fisheries Trade Permit (IFTP) and gather and retain specific data and information for covered fish and fish products as a condition of import. Mandatory reporting for 11 of the 13 types of seafood covered under SIMP began on 1 January 2018. Reporting and recordkeeping for shrimp and abalone became effective on 31 December 2018.

The collection of catch and landing documentation for these priority seafood species is accomplished through the International Trade Data System, the US government's single data portal for all import and export reporting. The importer of a consignment is required to keep records regarding the chain of custody of the fish or fish product from harvest to point of entry into the US, to be able to verify whether it was lawfully harvested or produced. As well, the National Marine Fisheries Service (NMFS) carries out random and targeted audits on IFTP holders to verify harvest and landing information. If a SIMP audit finds that an import shipment contained IUU-fished or misrepresented seafood, NOAA will provide the auditee with the finding. The information will also be referred to NOAA's Fisheries Office of Law Enforcement for further action as appropriate.³⁹ It is essential to note that the US SIMP system does not require validation of the information submitted by exporters by either flag, coastal, port or processing States prior to an auditing. The responsibility to check the validity of the information lies with the importer.

³⁶ Sullivan, C and Valentine, M. (2023). No Questions Asked. Available at: <https://usa.oceana.org/wp-content/uploads/sites/4/2023/03/No-Questions-Asked-March-2023-FINAL.pdf>. Accessed 2.10.2024.

³⁷ US fishers are already required to report catch information at landing.

³⁸ Abalone, Atlantic Cod, Blue Crab (Atlantic), Dolphinfish (Mahi Mahi), Grouper, King Crab (red), Pacific Cod, Red Snapper, Sea Cucumber, Sharks, Shrimp, Swordfish, Tunas (Albacore, Bigeye, Skipjack, Yellowfin and Bluefin).

³⁹ NOAA Fisheries, Guide to audit requirements for the Seafood Import Monitoring Program: Frequently Asked Questions, <https://www.iuufishing.noaa.gov/Portals/33/SIMP%20Audit%20Guidance.pdf?ver=2018-05-03-144502-367>, as accessed on 29 July 2019.

In November 2023, NOAA Fisheries withdrew a proposed rule that would have included a limited expansion of SIMP.⁴⁰ Under that proposed rule, SIMP would have increased the number of species included in the Program from approximately 1,100 to approximately 1,670 individual species, expanding the requirements of the Program to include all species of snapper, all species of tuna, cuttlefish, squid, octopus, eels, queen conch and Caribbean spiny lobster.⁴¹ NOAA Fisheries is currently undertaking a comprehensive review of the Program to enhance and strengthen the overall effectiveness of the Program.⁴² In 2023, NOAA reported that SIMP only covered 32% of seafood imports into the US.⁴³ NOAA Fisheries have since undertaken a comprehensive review of the Program in November 2023 to enhance and strengthen the overall effectiveness of the Program.⁴⁴ After engaging with over 7,000 stakeholders, in November 2024 NOAA Fisheries published a SIMP Action Plan that serves as a roadmap to strengthen SIMP, enhancing its ability to detect and deter IUU products from entering the US (Box 2).⁴⁵

The EU IUU Fishing Coalition recommends that NOAA moves forward to release a rulemaking to implement the recommendations of the Action Plan (Box 2). The key to a successful Program is to ensure there is maximum coverage of species that provide the same basic information on legal origin that is currently required of covered species, plus additional KDEs to meet the same requirements that exist in the EU import control scheme.



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40 Further information is available at: <https://www.fisheries.noaa.gov/feature-story/noaa-fisheries-announces-comprehensive-review-its-seafood-import-monitoring-program>

41 Further information is available at: <https://www.noaa.gov/news-release/noaa-seeks-to-expand-seafood-import-monitoring-program>. Accessed 10.5.2024.

42 Further information is available at: <https://www.noaa.gov/news-release/noaa-fisheries-withdraws-proposal-to-expand-seafood-import-monitoring-program>. Accessed 10.5.2024.

43 Report to Congress: Report on the Seafood Monitoring Program – FY 2023. (2023). Available at: <https://www.fisheries.noaa.gov/s3/2024-05/SIMP-Report-to-Congress-FY2023.pdf>. Accessed 2.10.2024.

44 Further information is available at: <https://www.noaa.gov/news-release/noaa-fisheries-withdraws-proposal-to-expand-seafood-import-monitoring-program>. Accessed 10.5.2024.

45 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.

Box 2. The SIMP Action Plan.

As of November 2024, the US has completed a review of SIMP and proposed an action plan to adjust SIMP based on stakeholder feedback.⁴⁶ There is no proposed timeline nor approval for regulatory changes yet, but the US is proposing to expand traceability requirements using risk-based strategies, encourage government department alignment to combat forced labour, strengthen interactions with the global market and increase internal capacity to support SIMP implementation.

Traceability requirements are being expanded through the creation of a two-tiered reporting system based on risk. This will contain a first tier including all species currently listed under SIMP with additions made for higher-risk seafood products and a second tier containing all other seafood imports. The first tier will maintain all current SIMP reporting requirements with additional KDEs including details on transshipment activities and fishing vessel trip dates that are currently not collected. To further aid traceability and allow screening time of high-risk imports, they will require importers to submit pre-entry SIMP data instead of at the point of entry which is currently required.

NOAA is planning greater government department support by increasing engagement with Customs and Border Protection and the Department of Labor. This will aid in enforcement and investigations of forced labour, assisted further by the additional KDEs collected in the first-tier.

Various updates to permitting and reporting schemes are being implemented to improve clarity, modernise systems and streamline data requirements. NOAA also plans to invest in training US importers, foreign exporters and Customs brokers to facilitate better compliance with SIMP. To further aid validation and traceability of imports, NOAA is developing a voluntary pilot programme for government-to-government import data, where partner nations can share harvest data.

Finally, NOAA committed to building their capacity to implement and grow SIMP by expanding the SIMP team and increasing the capacity of their online data systems. They have expressed a strong urge to move towards more proactive strategies and away from their post-entry reviews of already reported data. These changes will ultimately strengthen SIMP and help prevent products of IUU fishing from entering the US market by adopting more risk-based detection strategies.

3.3 Japan

Japan is the third largest seafood importer in the world, importing approximately USD 15 billion worth of seafood in 2022.⁴⁷ The main suppliers to the Japanese market are China, Chile, Russia and the US.⁴⁸ High-value seafood imported by Japan includes salmon, trout, skipjack, tuna and shrimp.⁴⁹

As then Prime Minister Shinzo Abe stated in September 2018, in order to eliminate IUU fishing activities, it is important to prevent the circulation of illicitly sourced seafood.⁵⁰ As such, on 1 December 2022, the *Act on Ensuring the Proper Domestic Distribution and Importation of Specified Aquatic Animals and Plants* (the Act) entered into force in Japan.⁵¹ This is the world's third comprehensive anti-IUU fishing control system after the EU IUU Regulation and US SIMP, with this CDS based on the EU's CCS. CCs will now be required for squid and cuttlefish, Pacific saury (*Cololabis spp.*), Mackerel (*Scomber spp.*) and Sardine (*Sardinops spp.*). According to the Japanese Authorities, these species were selected as they "are recognized to be particularly vulnerable to IUU fishing by foreign flagged vessels under foreign

46 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.

47 USDA. (2023). Japan: Seafood Market Update. Available at: <https://fas.usda.gov/data/japan-seafood-market-update>. Accessed 10.5.2024.

48 During the financial year 2020, source: Japanese Ministry of Agriculture, Forestry and Fisheries. <https://www.maff.go.jp/e/data/publish/attach/pdf/index-211.pdf>

49 *ibid.*

50 Speech by Prime Minister Shinzo Abe from the Inaugural Meeting of the High-Level Panel for a Sustainable Ocean Economy, New York, 24th September 2018, https://www.mofa.go.jp/ic/gic/page4e_000906.html, as accessed on 27 July 2019.

51 Further information on Japan's Act on Ensuring the Proper Domestic Distribution and Importation of Specified Aquatic Animals and Plants is available at: <https://www.jfa.maff.go.jp/220614.html>. Accessed 1.5.2024.

laws or international conservation and management measures.”⁵² The Act also covers domestic catch (although only abalone, sea cucumber and glass eel [to be added from December 2025]), with a view to coverage expansion after system digitization. Additionally, under the *Foreign Exchange and Foreign Trade Control Act*, Japan has an import control scheme for tuna and patagonian toothfish. Although there has been no thorough analysis of the KDE requirements under this act, the IUU Forum Japan is aware that the KDE requirements are essentially consistent with the requirements of the relevant RFMOs that Japan is a member of.⁵³

The EU IUU Fishing Coalition now encourages the Japanese Government to expand the species coverage for imported seafood and domestic catch, and to expand the required KDEs to meet the same requirements that exist in the EU import control scheme.



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52 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 1.5.2024.

53 EJF. (2024). Briefing to the Japanese Government on concerns over seafood products associated with illegal, unreported and unregulated fishing and human trafficking entering the Japanese market. Available at: <https://ejfoundation.org/reports/briefing-to-the-japanese-government-on-concerns-over-seafood-products-associated-with-illegal-unreported-and-unregulated-fishing-and-human-trafficking-entering-the-japanese-market>. Accessed 9.7.2024.

3.4 Republic of Korea

South Korea is the world's fifth largest importer of seafood products, importing 6.2 million tons of seafood from a total of 140 countries in 2023, worth USD 6.4 billion.⁵⁴ The top five trading partners are China, Russia, Vietnam, Norway and the US, accounting for 67% of South Korea's total seafood imports⁵⁵ and an increasing demand for seafood has resulted in an increasing reliance on imports.⁵⁶

There are two different seafood traceability systems in South Korea governed by two separate regulations – one for domestic seafood, targeting marine capture by South Korean-flagged vessels and farmed fish and another for imported seafood, targeting marine capture by foreign-flagged vessels and farmed fish.⁵⁷

In 2013, South Korea received a yellow card from the EU, under its so-called 'carding scheme',⁵⁸ due to evidence of illegal operations targeting croakers in West Africa, in particular in Sierra Leone.⁵⁹ In 2015, the yellow card was lifted after a series of measures taken by South Korea including amendments to its laws to significantly strengthen its Monitoring, Control and Surveillance (MCS) capacity.⁶⁰ However, concern remained over the South Korean government's capacity to monitor South Korean-owned, foreign-flagged vessels operating in West African waters and exporting to South Korea.⁶¹ The Korean Ministry of Oceans and Fisheries (MOF) adopted a country-level CDS in 2017 targeting three species, namely bobo croaker (*Pseudotolithus elongatus*), longneck croakers (*Pseudotolithus typus*) and Pacific saury (*Cololabis saira*).⁶² Firstly, the government introduced a CDS to monitor imported croakers. Saury was included in the CDS following an event in 2016 when allegedly almost 90 Taiwanese and Taiwanese-owned and Vanuatu-flagged saury vessels involved in IUU fishing were caught attempting to export their catch to South Korea.⁶³ Since then, there has been no further study by the Ministry of Oceans and Fisheries to expand the species covered by the CDS.

The CDS procedure begins when the captain or shipping agent of an incoming vessel carrying any CDS species submits a CC or a simplified CC to the authorities through an electronic system called the Port Management Information System (PORT-MIS).⁶⁴ The National Fishery Product Quality Management Service (NFQS), a South Korean government agency, then verifies the CC or the simplified CC issued by the exporting country. If a regular or simplified CC is not attached, the NFQS prohibits entry or landing.⁶⁵

In October 2024, the Ministry of Oceans and Fisheries revised the Distant Water Fisheries Development Act, expanding the KDEs requirements of its CC.⁶⁶ South Korea is now requesting what the EU IUU Fishing Coalition considers to be the minimum baseline of information for a robust import control scheme, but only for pacific saury, bobo croaker and longneck croaker caught by vessels over 20 tons,⁶⁷ a simplified CC is required for the same three species but if caught by vessels under 20 tons, to include only 5 of the Coalition's recommended KDEs. **The EU IUU Fishing Coalition commends South Korea on its expansion of KDEs in the CDS and now encourages South Korea to expand the species coverage of its CDS.**

54 Ministry of Agriculture, Food and Rural Affairs (April 2022)

55 The Ministry of Oceans and Fisheries, Republic of Korea, Fisheries data portal, seafood trade by nations, accessed on 25.Aug.2022 <https://fips.go.kr/p/S020706/>

56 The Ministry of Oceans and Fisheries, Republic of Korea, Fisheries data portal, seafood trade by year, accessed 23.8.2022 <https://fips.go.kr/p/S020704/#>. Portion of seafood imports is on the rise: (2017) 27.5% – (2018) 31.1% – (2019)31.6%

57 Environmental Justice Foundation (EJF). (2023). The broken barrier: how illegal fishing and human rights abuses in Korea's fisheries imports go undetected. Available at: <https://ejfoundation.org/reports/the-broken-barrier-how-illegal-fishing-and-human-rights-abuses-in-koreas-fisheries-imports-go-undetected>. Accessed 1.5.2024.

58 The EU IUU Regulation establishes a carding scheme for the identification of non-EU countries failing to implement adequate measures to prevent and deter IUU fishing. Further information about the EU's carding scheme is available at: https://oceans-and-fisheries.ec.europa.eu/fisheries/rules/illegal-fishing_en. Accessed 12.6.2024.

59 European Union, Official Journal of the European Union, C 346, 27 November 2013, COMMISSION DECISION of 26 November 2013 on notifying the third countries that the Commission considers as possible of being identified as non-cooperating third countries pursuant to Council Regulation (EC) No 1005/2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing (2013/C 346/03) Available at: [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013D1127\(02\)&from=EN](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013D1127(02)&from=EN). Accessed 1.5.2024.

60 EJF, news media (21 Apr 2015) EU Removes South Korea From List Of Those Failing To Combat Pirate Fishing, accessed on 20 May 2024, <https://ejfoundation.org/news-media/eu-removes-south-korea-from-list-of-those-failing-to-combat-pirate-fishing>

61 Environmental Justice Foundation (EJF). (2023). The broken barrier: how illegal fishing and human rights abuses in Korea's fisheries imports go undetected. Available at: <https://ejfoundation.org/reports/the-broken-barrier-how-illegal-fishing-and-human-rights-abuses-in-koreas-fisheries-imports-go-undetected>. Accessed 1.5.2024.

62 Ibid.

63 Ibid.

64 Available at: <https://incheon.mof.go.kr/en/page.do?menuIdx=1822>

65 Disembarkation is permitted in the case of entering port with other cargo.

66 The Ministry of Oceans and Fisheries, Korea Distant Water Fisheries Development Act/Decree No. 697, October 25, 2024, Partially Revised.

67 Korea Distant Water Fisheries Development Act Article 14, Enforcement Rule Article 23.1(3) <https://law.go.kr/lsLinkCommonInfo.do?lspttnfnfSeq=78979&chrClsCd=010202>. Accessed 25.1.2025

4. Recommended best practices

4.1 Key data elements (KDE)

This section discusses the KDEs that the EU IUU Fishing Coalition deems to be important as a minimum basis for a robust import control scheme, based on literature reviews and analysis of existing schemes. KDEs are defined as critical data that are required to successfully determine product legality and to trace a seafood product through all relevant stages of the supply chain.⁶⁸ KDEs usually focus on information relating to the who, what, when, where and how of a seafood product as it moves through the different stages.⁶⁹ This section is a precursor to Section 5, where the EU, US, Japan and South Korea import control systems are compared against the below recommended set of KDEs. In Section 5, the alignment of KDEs between the EU, US, Japan and South Korea are discussed, inferring whether technical harmonisation of KDEs would assist in the global fight against IUU fishing and trade facilitation.

I. WHO – Vessel identifications and operators in processing States	
Vessel name	Specifying the name of the fishing vessel associated with a consignment enables import control authorities to cross-reference with vessel registers, photographs and other documents, helping to rule out vessel identity fraud. ⁷⁰ The vessel name should be legally associated with a vessel identification number, the EU IUU Fishing Coalition recommends a unique vessel identifier (UVI) like the International Maritime Organization (IMO) number. ⁷¹
Unique vessel identifier (IMO number)	A UVI is a unique vessel identifier, usually taking the form of a series of letters and numbers, that is assigned to a vessel to ensure international traceability. Once given, the UVI is with the vessel for its entire life, regardless of changes in flag, ownership, or name. In addition, it cannot be re-used by any other vessel with a permanent physical marking. Flag States are responsible for mandating and implementing UVIs for fishing vessels, as required by relevant national and regional regulations. IMO numbers ⁷² are considered the gold standard of international UVI and are also an integral part of the FAO Global Record of Fishing Vessels, Refrigerated Vessels and Supply Vessels. ⁷³ An IMO number is one of the most useful and reliable vessel characteristics for risk analysis purposes. In instances where government registration systems do not exist or are not adequate, the EU IUU Fishing Coalition recommends mandatory use of IMO numbers for all eligible vessels. At the time of this study, the latest eligibility criteria are described in IMO's 2017 Assembly Resolution A.1117(30) and include motorised inboard fishing vessels, including wooden ones, of less than 100 gross tonnage down to a size limit of 12 metres in length overall authorised to operate outside waters under the national jurisdiction of the flag State.

68 The Oceans and Fisheries Partnership (2017). Data Requirements for Catch Documentation and Traceability in Southeast Asia.

69 Ibid.

70 FAO (2017). The Marking and Identification of Fishing Vessels.

71 EU IUU Fishing Coalition (2017). PAS 1550:2017 Exercising due diligence in establishing the legal origin of fishery/seafood products and marine ingredients – Importing and processing – Code of practice; https://ec.europa.eu/fisheries/sites/fisheries/files/docs/body/technical_note_en.pdf.

72 International Maritime Organization: <http://www.imo.org/en/ourwork/msas/pages/imoidentification-numberscheme.aspx>.

73 For more information please see The Pew Charitable Trusts, The IMO Number Explained. <https://www.pewtrusts.org/en/research-and-analysis/fact-sheets/2017/05/the-imo-number-explained>

Vessel flag

Under the United Nations Convention on the Law of the Sea (UNCLOS), any country has the right to allow a vessel to fly its flag and therefore bestow its nationality upon that vessel.⁷⁴ The flag State is legally responsible for ensuring compliance with national and international laws and for providing effective enforcement regardless of where violations occur.⁷⁵ Flag States have primary prescriptive and enforcement jurisdiction over vessels on their register. In practice, this means that flag States decide both which laws shall apply to the owners and operators of their vessels and whether or not to enforce them. In deciding whether to grant nationality to a vessel, flag States apply varying levels of scrutiny and criteria. Some flag States have comparatively lax criteria concerning the vessels which may be added to their registries.

“Flags of convenience”⁷⁶ operate open registries, where the beneficial ownership or control of a registered vessel is found to lie outside the vessel’s flag State.⁷⁷ Countries that fail to comply with international fisheries laws and do not monitor the vessels that are registered to their flag are referred to as ‘flags of non-compliance’.⁷⁸

Providing information on a vessel’s flag State can therefore highlight to import control authorities whether the seafood is at high-risk of being from IUU origin. An import from a ‘flag of non-compliance,’ for example, can warrant further checks from the import control authority.

International Radio Call Sign

The International Radio Call Sign (IRCS) is a unique alphanumeric identity that belongs to the vessel. It enables two vessels with the same vessel name to be identified separately.

Information of exporter / re-exporter

The “processing State” concept is not yet recognised in international fisheries law, yet it is a significant component of the supply chain. Current CDS cover the entry of products into markets and their exportation, but processing States are treated as “black boxes”, where the transformations of seafood are often not traced, giving opportunity for products of IUU fishing to enter the supply chain. There is a need for traceability tools to cover events between entry and exit of processing states so that regulatory controls can establish where anomalies occur and identify those responsible.⁷⁹

The name, address and telephone number of the exporting or re-exporting company should be made available in addition to the point of exportation/ departure and State of destination.⁸⁰ This information ensures that all actors in the supply chain are named, enabling full traceability of the fish. It also allows authorities to check the validity of the company and contact the company if there are any concerns.

⁷⁴ See Article 91 of the United Nations Convention on the Law of the Sea (UNCLOS), 4 December 1982, United Nations (stating that ships possess the nationality of the state in which they are registered and are subsequently subject to the laws of that jurisdiction) available at http://www.un.org/depts/los/convention_agreements/texts/unclos/unclos_e.pdf.

⁷⁵ Article 217 of UNCLOS.

⁷⁶ International Transport Workers' Federation (ITF), Current Registries Listed as Flags of Convenience (FOCs), <https://www.itfseafarers.org/foc-registries.cfm>, as accessed on 29 July 2019.

⁷⁷ International Transport Workers Federation <https://www.itfglobal.org/en/sector/seafarers/flags-of-convenience>.

⁷⁸ Swan, J. (2002). Fishing Vessels Operating under Open Registries and the Exercise of Flag State Responsibilities. FAO, Rome, 2002: <http://www.fao.org/3/a-y3824e.pdf>; Miller, D.D. and Sumaila, U.R. (2014). “Flag use behavior and IUU activity within the international fishing fleet: Refining definitions and identifying areas of concern” in Marine Policy 44, 204–211.

⁷⁹ Hosch, G. & Blaha, F. (2017).

⁸⁰ Regulation (EU) No 640/2010 of the European Parliament and of the Council of 7 July 2010 establishing a catch documentation programme for bluefin tuna *Thunnus thynnus* and amending Council Regulation (EC) No 1984/2003, <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32010R0640&rid=7#d1e35-12-1> (Annex III)

Identity of import company	Identification of the importing company (name, address and telephone number), whether that be in the destination country or in a processing State, is needed to keep track of fish products along the value chain, whether it is processed or not. When foreign catch is imported first to a processing State, a processing statement must be issued at the time of exportation, linking the source products and foreign catch certificate(s) with the end products in the consignment. In addition, information on the point of importation/destination (city, country, state) is needed.
II. WHAT – Type and quantity of catch	
Product type	The ICS should clearly specify the product types (e.g. fresh, frozen, fillet, loin, surimi, fish meal etc.).
Species name embedded in the FAO/ASFIS 3-Alpha Code	The FAO collates world capture and aquaculture production statistics at either the species, genus, family or higher taxonomic levels in 2,346 statistical categories (2019 data release) referred to as species items. The Aquatic Sciences and Fisheries Information System (ASFIS) list of species includes 12,771 species items selected according to their interest or relation to fisheries and aquaculture. For each species item stored in a record, codes (ISSCAAP group, taxonomic and 3-alpha) and taxonomic information (scientific name, author(s), family and higher taxonomic classification) are provided. ⁸¹ This is considered the best international and harmonised practice to identify species worldwide. This is essential information to be cross-referenced to ensure that the vessel has caught what it is legally allowed to and to avoid mislabelling fraud.
Estimated live weight (kg)	This information allows for cross-checks in cases where laundering is suspected. When the importation involves processed products, providing the conversion factors ⁸² that have been used in calculations should be mandatory. This helps to determine whether the weight of the processed product is consistent with the weight of catch used in processing, as indicated in the processing statement. ⁸³ National authorities should hold their own conversion factors ⁸⁴ (which should be revised regularly) or should be adhering to RFMO conversion factors. Additional live weight conversion factors may be consulted in the Handbook of Fishery Statistical Standards from the FAO's Coordinating Working Party on Fisheries Statistics. ⁸⁵
Processed weight (kg)	When foreign catch is imported by a processing State for re-export to the final market, processed weight should be clarified linking the source products and catch documentation with the end products in the consignment.
Declaration and authorisation of transshipment at sea	Illegal fishers take advantage of transshipment practices to 'launder' illegally caught fish (by mixing illegal and legal fish, the illegal fish takes on the documentation of the legal catch). Also, because reefers do not fish, they are often exempt from catch documentation and monitoring requirements, creating a missing link in the chain of custody from vessel to plate. It is essential that transshipment is better regulated, facilitating traceability and accountability, by recording information on the vessel's identity, date and area of transshipment, species, estimated weight transhipped, UVI, as well as information about the donor vessel.

81 FAO Fisheries and Aquaculture Statistics and Information Branch (FIAS), <http://www.fao.org/fishery/collection/asfis/en>, as accessed on 29 July 2019.

82 The EU system for fisheries controls, Conversion factors, https://ec.europa.eu/fisheries/cfp/control/conversion_factors/, as accessed on 29 July 2019.

83 EU IUU Fishing Coalition (November 2016). Risk assessment and verification of catch certificates under the EU IUU Regulation.

84 The EU system for fisheries controls, Conversion factors, https://ec.europa.eu/fisheries/cfp/control/conversion_factors/, as accessed on 29 July 2019.

85 FAO, Coordinating Working Party on Fishery Statistics, Conversion factors, <http://www.fao.org/cwp-on-fishery-statistics/handbook/capture-fisheries-statistics/conversion-factors/en/>.

III. WHEN – Dates of the operation

Event date	The date (day, month and year) on which the harvest activity occurs. This helps an importing authority to verify that the fisher was legally allowed to carry out such activity at that time, which is also particularly useful for monitoring compliance in the case of closure periods.
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IV. WHERE – Location

Catch area	<p>The catch area is the location(s) where capture of seafood has occurred. The catch area for fishing activity should be specific. The following catch area codes currently recommended are:</p> <ul style="list-style-type: none">• International Organization for Standardization country codes when fishing occurs within a country's exclusive economic zone (EEZ)• the RFMO when fishing occurs in an RFMO jurisdiction• FAO fishing area codes – to improve traceability and achieve proper port controls, better defined catch areas with a clear distinction between the EEZ and the high seas should be mandatory.
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Authorisation to fish	This type of authorisation is a unique number associated with a regulatory document from the relevant authority granting permission for wild-capture of seafood by a fisher or fishing vessel. Evidence of authorisation to fish and/or transship should be specified in import documentation. This is needed to confirm that the competent authority has given authorisation for these activities to take place and that harvest is in compliance with any relevant management measures. The authorisation should contain information about duration, area, species, quantity limits, gears and issuing authority.
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Port of landing	The port of landing is the location where seafood was first discharged to land. The port where a vessel unloads the catch is key information for traceability purposes as it is the point where products transit from the sea-borne into the land-based supply chain. The date of landing should also be specified.
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Processing location	Name and address of the processing plant, approval number of the processing plant and health certificate number and date.
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V. HOW – Fishing methods

Fishing gear or catching method	The fishing gear is the equipment used to capture seafood. This information allows an importing authority to verify that the event owner has carried out such activity in a lawful way. For example, the International Commission for the Conservation of Atlantic Tunas (ICCAT)'s species-specific Electronic Bluefin Tuna Catch Document Programme (eBCD) ⁸⁶ has a database of gear codes that are internationally accepted. ⁸⁷ These descriptions should be aligned with FAO's International Standard Statistical Classification of Fishing Gear.
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⁸⁶ International Commission for the Conservation of Atlantic Tunas (ICCAT), Data Code System, https://www.iccat.int/en/stat_codes.html, as accessed on 29 July 2019.

⁸⁷ FAO, International Standard Statistical Classification of Fishing Gear, <http://www.fao.org/cwp-on-fishery-statistics/handbook/tools-and-resources/en/>

4.2 Scope and operational best practices

The following attributes are not KDEs but are important qualitative characteristics that we deem necessary for creating an effective ICS.

VI. Scope	
Species covered by the import control scheme	The significance of an ICS depends on the number of species covered. KDEs required may be strong but only limited to a few species hence reducing its effectiveness. An effective ICS should cover all species.
Import data captured in digital format	When import information is captured digitally, there is greater scope for information exchange (both internally and externally), data processing as well as reduced risk of fraud and streamlined controls in market States. ⁸⁸
Authorities or stakeholders responsible for verification	Depending on which authorities or stakeholders are responsible for the validation of the import along the value chain, the institutional approach and the philosophy behind ICS will differ as will the capacity needed. There are currently several validation points, including flag State responsibility to approve an authorisation, the port State at the point of landing and the processing State when it comes to food safety. From this perspective, a market State needs to set up an institutional framework that determines which authorities or industries should have the responsibility to make sure the data and information is legitimate.
Risk assessment to target at-risk imports	It is vital for importing markets to develop a robust risk assessment protocol and/or system to target at-risk imports. It is not feasible for every consignment to be assessed. Several of the largest importing Member States in the EU – such as Germany, Spain and France – receive between 40,000 and 60,000 paper CCs each year, equating to between 110 and 165 CCs per day. ⁸⁹ Maximising efficiency in the verification of consignments is paramount. Importing markets should have a robust risk assessment procedure to ensure they are carrying out rigorous and stringent verifications on imports most at risk of being products of IUU fishing. Ideally, a central registry of transactions should be in place where all steps from harvest to imports are registered. If information at one step is missing or flagged by the risk-based assessment, the certification process is halted due to a risk assessment alarm warranting further checks.
Data exchange between market States	Relevant data exchange between market States and RFMOs on risky imports (and associated actors in the supply chain) can help to prevent unscrupulous actors working in other regions of the world or ‘shopping’ for the entry point of least resistance. This practice of data and information sharing already takes place between some RFMOs. A central registry of transactions would significantly facilitate data exchange.
Simplified catch documentation for small-scale fisheries	As recommended by the FAO, CDS should account for the needs and special requirements of small-scale fisheries (SSF). ⁹⁰ Simple catch documentation reduces the burden of data collection for SSF and ensures that smaller vessels can continue to export seafood to major market States. Criteria defining applicable vessels must be set out.

⁸⁸ EU IUU Fishing Coalition (2016). Modernisation of the EU IUU Regulation Catch Certificate System.

⁸⁹ Ibid.

⁹⁰ FAO. (2017). Voluntary guidelines for Catch Documentation Schemes. Available at: https://www.wto.org/english/tratop_e/rulesneg_e/fish_e/2017_vg_cds.pdf. Accessed 8.4.2022.

5. Results of KDE comparative analysis

In this section, the EU, US, Japan and South Korea are compared against the EU IUU Fishing Coalition's recommended KDEs. The existing unilateral schemes are also compared against each other to determine how aligned the systems are in relation to the above KDEs. The results of this analysis are displayed in Figure 1.

	Best practice
	Optional or needs to be strengthened/improved
	Not required

*For IOTC the KDEs refer to the bigeye tuna statistical document which is required to accompany any shipments of tuna in order to be considered legitimate.

	Key data element (KDE)	European Union	United States	Japan	Republic of Korea	RFMO & CCAMLR Catch Documentation Schemes				Additional Information
						ICCAT	CCSBT	CCAMLR	IOTC* (Statistical Document)	
WHO	Vessel name									
	Unique vessel identifier (IMO number)	From 10th January 2026								EU: requests an IMO number and, if it is not applicable, another unique vessel identifier, if applicable. US: requests a UVI when available. Japan: IMO number or Lloyd's Register number required if issued. CCAMLR: the option to provide an IMO number is provided, but not mandatory.
	Vessel flag									
	International Radio Call Sign (IRCS)									Japan: call sign required if issued.
	Information on exporter / re-exporter									ICCAT: only requests company name.
	Identity of import company									
WHAT	Product type									
	Species name – ASFIS 3-Alpha Code									Japan: requires HS code of product, not ASFIS 3-Alpha code
	Estimated live weight (kg)									ICCAT: ICCAT requests "Total weight" and "Average weight". CCSBT: requests the net weight. IOTC: requests the net weight.
	Processed weight (kg)									ICCAT, CCSBT, CCAMLR and IOTC require the net weight of harvested or processed products to be re-exported from the territory of a contracting party where it has previously been imported.
	Transshipment: Declaration and authorisation of transshipment at sea, IMO number and vessel master information									EU: bans all transshipment at sea US: does not request vessel master information. Japan: IMO number or Lloyd's Register number only required if issued. CCSBT: does not require IMO number in the declaration.
WHEN	Event date									
WHERE	Catch area (better defined with a clear distinction between the EEZ and the high seas)	From 10th January 2026								CCSBT, ICCAT and IOTC: require the name of their own catch areas, which does not always distinguish between the EEZ and the high seas.
	Authorisation to fish									US: required if available.
	Port of landing									
	Processing location									
HOW	Fishing gear type or catching method	From 10th January 2026								EU: fishing gear must be indicated. Japan: required fishing license number and licensed fishing method. This isn't as specific as the US which requires the fishing gear type specifically.

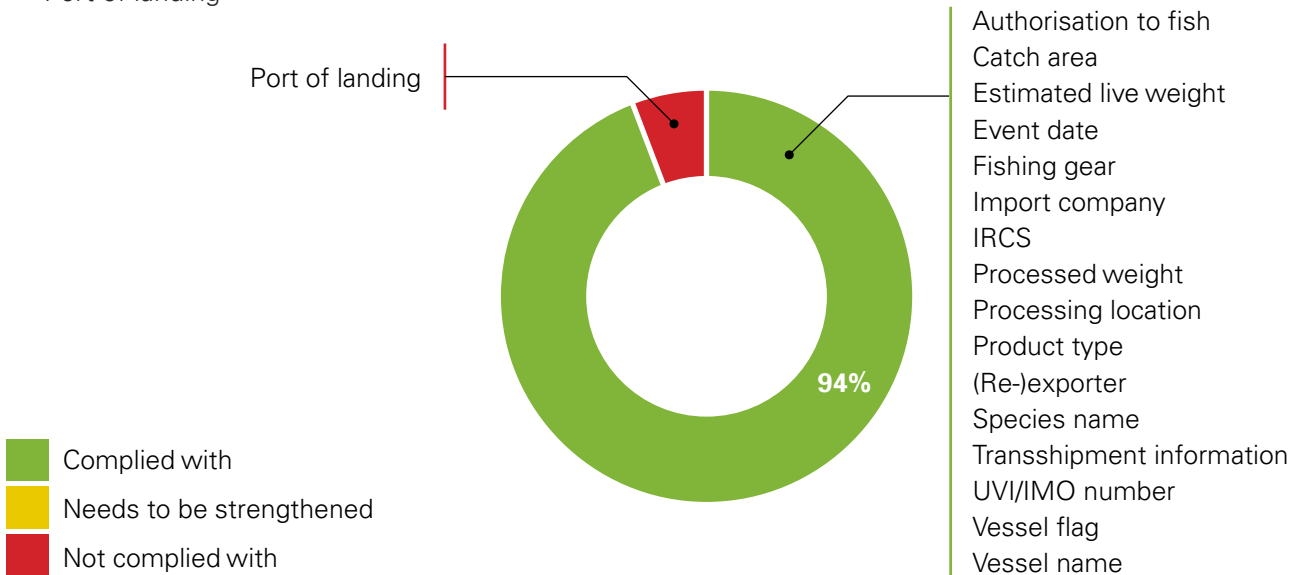
	Key data element (KDE)	European Union	United States	Japan	Republic of Korea	RFMO & CCAMLR Catch Documentation Schemes				Additional Information
						ICCAT	CCSBT	CCAMLR	IOTC* (Statistical Document)	
SCOPE AND OPERATIONAL BEST PRACTICES	Species covered by the import scheme	All catches of marine fishery products, with the exception of aquaculture obtained from fry or larvae, ornamental fish, mussels, snails and other products of minor importance (full list at https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:32010R0086)	Abalone, Atlantic cod, blue crab (Atlantic), dolphinfish (mahi mahi), grouper, king crab (red), Pacific cod, red snapper, sea cucumber, sharks, shrimp, swordfish, tunas (albacore, bigeye, skipjack, yellowfin, and bluefin)	Class II Aquatic Animals and Plants: squid species, cuttlefish species, Pacific sauries (Cololabis spp.), mackerels (Scomber spp.) and sardines (Sardinops spp.) Information on excluded products is available at: https://www.jfa.maff.go.jp/attach/pdf/220614-3.pdf	Bobo croaker, longneck croaker, and pacific saury – if caught by vessels over 20 tons.	Atlantic Bluefin Tuna	Southern Bluefin Tuna	Toothfish (Dissostichus)	Bigeye Tuna	
	Import data capture in digital format									EU: has developed an IT system for CDS (CATCH) which is currently being trialed. Japan: the procedures under the catch documentation scheme may be established, validated or submitted by electronic means or be replaced by electronic traceability systems which ensure the same level of control by authorities. The use of electronic means by a flag State shall be consulted with Japan during the bilateral consultation.
	Authorities or stakeholders responsible for verification	Coastal and flag States	Importers and NOAA to verify importers' activities	Coastal and flag States	Flag and market States	Flag and market States	Flag and market States	Flag and market States	Flag and market States	
	Risk assessment to target at-risk imports			Cannot yet be determined.		NA	NA	NA	NA	JP: information provided in submitted catch certificates is reviewed and when anything suspicious or of concern is spotted, further investigation takes place to confirm that the provided information is valid and acceptable. We were unable to get more detail on how the reviewing process and the investigation are conducted. (Note: The Japanese system had only been implemented for three months at the time we gathered information.)
	Data exchange between market States			Cannot yet be determined.		NA	NA	NA	NA	JP: to make the operation of the new system more efficient, Fisheries Agency officials are communicating with regulators of each government in charge of catch certificates to Japan. (Note: The Japanese system had only been implemented for three months at the time we gathered information.) Existing rules and regulations by RFMOs that Japan is a member of, would be obeyed appropriately.

5.1 EU KDE analysis

The EU is currently requiring 13 out of the 17 KDEs (77%) recommended in this report but from 10 January 2026, once the updated legislation enters into force, this will be improved to 16 of the 17 recommended KDEs (94%).

The one KDE that won't be requested by the EU following the above milestone is:

- Port of landing



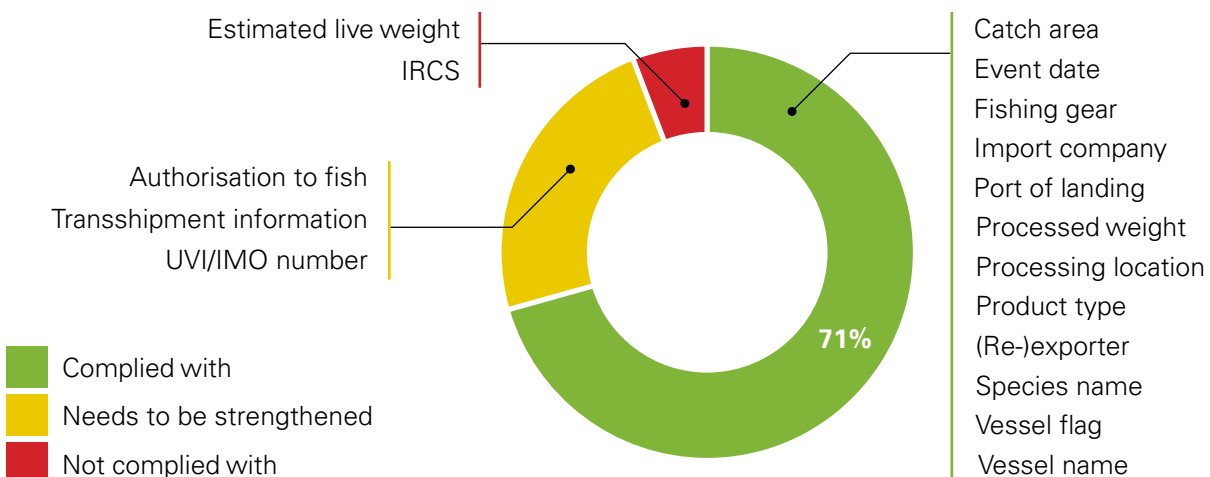
5.2 US KDE analysis

The US currently requests 12 out of the 17 KDEs (71%) recommended in this report.⁹¹ Three KDEs are either conditional, referred to as “optional” since they are only requested when the information is legally required, or their application should be strengthened. These are:

- IMO number: a UVI is requested when available. To reach a level playing field and expand the adoption of the scheme as a vital tool in the fight against IUU fishing, IMO numbers should be a mandatory requirement in line with the 2017 IMO Resolution.
- Transshipment information: vessel master information is not requested for cases of transshipment.
- Authorisation to fish: only required if this is made available by the flag State.

The two KDEs not requested by the US are:

- Estimated live weight
- IRCS



⁹¹ For the purposes of this analysis the authors also consulted Elizabeth Havice (June 2017), US Seafood Import Monitoring Program: Briefing and analysis for the Pacific Islands Forum Fisheries Agency.

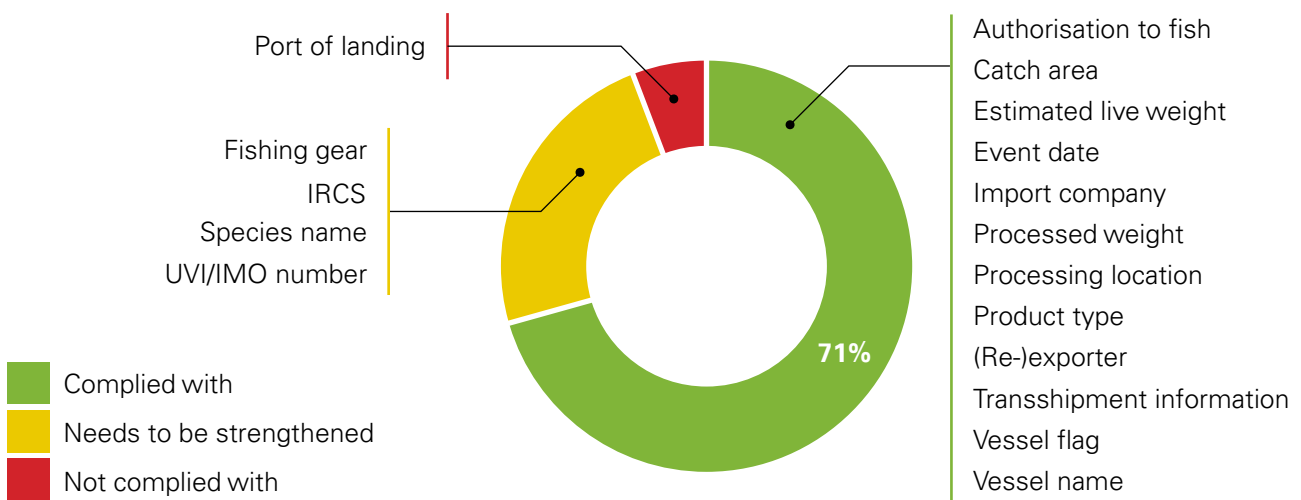
5.3 Japan KDE analysis

Japan currently requests 12 out of the 17 KDEs (71%) recommended in this report. 4 KDEs are either conditional or their application should be strengthened. These are:

- IMO number: The IMO number or Lloyd's Register number is only required if issued. To reach a level playing field and expand the adoption of the scheme as a vital tool in the fight against IUU fishing, IMO numbers should be a mandatory requirement in line with the 2017 IMO Resolution.
- IRCS: Call sign only required if issued.
- Species name: Japan requires HS code of product, not ASFIS 3-Alpha code.
- Fishing gear: The fishing licence number and licenced fishing method is required. This is not as specific as the US which requires the fishing gear type specifically.

The one KDEs not requested by Japan is:

- Port of landing



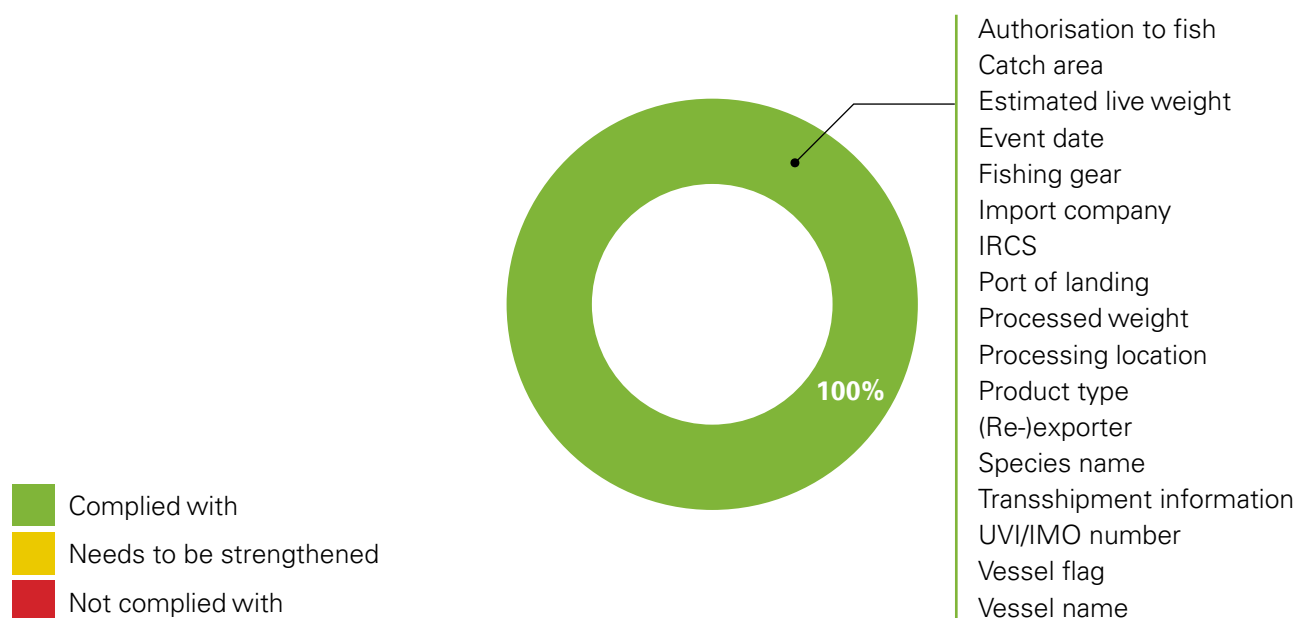
Additionally, under the *Foreign Exchange and Foreign Trade Control Act*, Japan has an import control scheme for tunas and patagonian toothfish, essentially transposing the respective schemes by the three relevant regional fisheries bodies.⁹² Although there has been no thorough analysis of the KDE requirements under this act, the IUU Forum Japan is aware that the KDE requirements are essentially consistent with the requirements of the relevant RFMOs that Japan is a member of.⁹³

⁹² Japan is required to comply with the CDS of ICCAT, CCAMLR, CCSBT and the statistical documentation scheme of IOTC, which means providing information on catches of Patagonian toothfish, southern bluefin tuna, Atlantic bluefin tuna and bigeye tuna. The KDEs that ICCAT and CCSBT request in their CDS are 47% aligned with our recommendations. The KDEs that CCAMLR requests are 76% aligned with our recommendations. The KDEs requested in the IOTC statistical document are 41% aligned with our recommendations. For more information please also see EU IUU Fishing Coalition's Seafood traceability: Aligning RFMO catch documentation schemes to combat IUU fishing (2021). Available at: https://www.iuuwatch.eu/wp-content/uploads/2021/12/EU-IUU-Fishing-Coalition_Seafood-Traceability-Report_Dec-2021-1.pdf. Accessed 17.7.2024.

⁹³ EJF. (2024). Briefing to the Japanese Government on concerns over seafood products associated with illegal, unreported and unregulated fishing and human trafficking entering the Japanese market. Available at: <https://ejfoundation.org/reports/briefing-to-the-japanese-government-on-concerns-over-seafood-products-associated-with-illegal-unreported-and-unregulated-fishing-and-human-trafficking-entering-the-japanese-market>. Accessed 9.7.2024.

5.4 Republic of Korea KDE analysis

As of 25 October 2024, South Korea requires all 17 of the KDEs recommended by the EU IUU Fishing Coalition, but only for three imported species, if caught by vessels over 20 tons.⁹⁴ This will make it the first country in the world to fully meet the 17 recommended KDEs presented in this report. Prior to 25 October 2024, South Korea asked for only 5 out of the 17 KDEs (30%) recommended in this report, 5 KDEs were either conditional or the application should be strengthened and 6 KDEs are not required at all.⁹⁵



5.5 Global KDE alignment: the EU, US, Japan and the Republic of Korea

Since the previous version of this report, published in 2020, we have witnessed the improvement of the EU existing catch certification scheme and seen a number of countries establish or expand their own systems – notably Japan and South Korea. This demonstrates the growing recognition of the importance of import control systems as a vital tool to prevent the importation of any products of IUU fishing. It may also point to some degree of frustration over the slow pace with which RFMOs are introducing and/or revising their catch documentation schemes. Other market States are also beginning to establish their own systems, most notably Australia.⁹⁶

The US SIMP system is fundamentally different to the EU's, Japan's and Korea's systems in how the CDS is operated and who is responsible (Box 3). KDE alignment demonstrates similarities in basic requirements by the US compared to the EU, Japan and South Korea. These include vessel name, vessel flag, information on exporter/re-exporter, identity of import company, product type, species name, processed weight, event date, catch area, processing location and fishing gear type/catch method.

From January 2026, the KDEs required by the EU, Japan and South Korea's import control schemes should be greatly aligned, though some differences will remain. South Korea's CDS for three imported species is in almost perfect alignment with the EU CCS (94%) following the revisions of October 2024. Japan and the US both have areas to strengthen or create requirements for their CDSs: Unique vessel identifiers (i.e. IMO numbers) where both should strengthen existing conditional requirements (only required if available/issued) and IRCS where Japan should make this requirement mandatory and the US should introduce it.

⁹⁴ Korea Ministry of Fisheries. (2024). Legislative note on the implementation rules of the Ocean Industrial Development Act. Information available (in Korean) at: <https://www.mof.go.kr/doc/ko/selectDoc.do?docSeq=56351&pagecnt=10&searchDeptName=%EC%9B%90%EC%96%91%EC%82%B0%EC%97%85%EA%B3%BC&searchSelect=title&searchStartDate=&recordCountPerPage=&menuSeq=878&searchEndDate=&bbsSeq=36&searchValue=¤tPageNo=1>. Accessed 2.10.2024.

⁹⁵ Environmental Justice Foundation (EJF). (2023). The broken barrier: how illegal fishing and human rights abuses in Korea's fisheries imports go undetected. Available at: <https://ejfoundation.org/reports/the-broken-barrier-how-illegal-fishing-and-human-rights-abuses-in-koreas-fisheries-imports-go-undetected>. Accessed 1.5.2024.

⁹⁶ Further information on Australia's draft report considering measures to prevent the importation of illegal, unreported and unregulated seafood is available at: <https://haveyoursay.agriculture.gov.au/iuu-seafood-imports>. Accessed 2.10.2024.

Box 3. US SIMP in global market context

The US SIMP establishes what is essentially a reporting and recordkeeping procedure relating to the importation of certain at-risk fish species and fish-derived products,⁹⁷ placing liability on the importer of record. The validation or counter-validation of industry-generated information by designated competent authorities along the supply chain is not required. This approach is fundamentally different from the one followed by the EU, Japan and South Korea, where the flag State plays a central role in the issuing and validation of the information present in the CC.

Whereas in the US SIMP, the importer needs to hold an annually renewable IFTP, in the EU, the European Commission has to formally approve the competent authority of the non-EU country in charge of validating the CCs if they are to be used to access the EU market. The EU CCS also requires information 72 hours in advance for imports by sea, whereas the SIMP requires information at the time of entry into the US.

The changes proposed in the SIMP Action Plan (Box 2) will begin to bring the US SIMP system into greater alignment with the EU's exemplar system that has been closely followed by Japan and South Korea. Key changes that will bring SIMP's format into greater alignment with other unilateral systems include:

- Mandating pre-entry data to shift to a proactive screening system.
- Increasing government department engagement to aid enforcement.
- Starting voluntary dialogues with partner nations to share harvest data and improve import validations.



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⁹⁷ Hosch, G. (2016), Trade Measures to Combat IUU Fishing: Comparative Analysis of Unilateral and Multilateral Approaches.

6. Recommendations

In the coming years, the EU IUU Fishing Coalition expects more market States to adopt their own unilateral import control rules. The Coalition believes that the adoption of import control schemes is key to improve traceability, to identify and therefore stop IUU-caught seafood from entering markets. However, in order to create a robust system, particular information needs to be gathered. This report presents a suite of 17 KDEs and five operational best practices that the EU IUU Fishing Coalition deems essential in any import control scheme. Specifically, the EU IUU Fishing Coalition recommends:

The operation:

- Expand unilateral import schemes to cover all species. The vast majority of globally traded species are at significant risk of IUU fishing and/or are overfished. Selecting some species but leaving others vulnerable creates perverse incentives for laundering covered products and labelling them as those which are not covered by a given scheme.
- Adopt electronic systems for more efficient and secure data handling as well as to facilitate data exchange and cross checks. Paper-based systems are inefficient, do not allow for fast processing and cross-referencing and are an easier target for fraudulent activity, including tampering. For example, in the EU, unscrupulous economic operators could use copies of the same CC to export/import multiple consignments of fishery products into different points across the EU, in excess of the full amount stated on the original CC.^{98,99}
- Require independent observation and verification of information, using electronic log-book, vessel monitoring systems (VMS) and Automatic Identification Systems (AIS) as well as on-the-water tools like electronic monitoring (EM),¹⁰⁰ to ensure accuracy of information and, potentially, trigger additional actions by the competent authorities where instances of IUU fishing are identified during the verification process.
- Improve routine and timely information sharing, including on rejected consignments, which can allow authorities to restrict market access to unscrupulous actors, with an emphasis on beneficial owners. The ratification and implementation of the FAO Port State Measures Agreement (PSMA) can assist in this field.

The who:

- Mandate the use of IMO numbers, the industry's gold standard when it comes to unique vessel identifiers, for all eligible vessels.
- Mandate the use of IRCS, which enables cross-checking of vessel identities. This is particularly useful when two vessels have the same name.
- Strengthen processing State traceability along the entire chain of events as well as inter-agency cooperation (e.g. customs, port authorities and food safety services) in order to be able to detect mass balance violations at national level (more product being exported than imported), particularly in cases of complex national supply chains.¹⁰¹

The what:

- Better reflect information on live and processed weights to improve the identification of inconsistencies in catch reporting and documentation within the CC.

⁹⁸ Clarke, S., Hosch, G., Sasama Consulting, FMO Consulting. Traceability, legal provenance & the EU IUU Regulation, 19 April 2013.

⁹⁹ EU IUU Fishing Coalition (2016). Modernisation of the EU IUU Regulation Catch Certificate System.

¹⁰⁰ Electronic Monitoring (EM) is the use of on-board video cameras, sensors, and GPS, and is a vital tool used to improve fisheries transparency and transform large-scale fisheries across the globe. Further information is available at: <https://www.nature.org/en-us/what-we-do/our-priorities/provide-food-and-water-sustainably/food-and-water-stories/fishing-for-better-data/>. Accessed 24.2.2024.

¹⁰¹ For more information on suggested practices please refer to Hosch, G. & Blaha, F. (2017). Seafood traceability for fisheries compliance: Country-level support for the effective implementation of catch documentation schemes. FAO Fisheries and Aquaculture Technical Paper No. 619. Rome.

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- Transshipment should be better regulated through KDEs that facilitate traceability and accountability, for example by including information on IMO numbers and vessel master.

The where:

- Better define catch areas at international or regional level (i.e. in each RFMO) with a clear distinction between the high seas and EEZ in order to improve traceability.
- Include port of landing (where market States are not a signatory to PSMA) as it is a key piece of information for traceability purposes considering it is the point where products transition from the sea-borne into the land-based supply chain.
- Mandate fishing authorisation information to be provided for all species covered by a unilateral import scheme. The authorisation should contain information about duration, area, species, quantity limits, gears and issuing authority as it is essential in confirming that fishing activity for high risk species is closely monitored and regulated.

The how:

- Fishing gear and catching method information should be mandatory information requirements.

By analysing the strengths and weaknesses of existing systems, similarities and differences in the information requested are observed. KDEs should be aligned between market States to remove loopholes for unscrupulous actors, provide clarity for industry and enable information exchange, cross-referencing, trade facilitation and interoperability.

This is particularly important for major market States such as the EU, US, Japan and South Korea with established unilateral ICS. Australia, as another major market State, is in the process of developing its own unilateral scheme and is hence encouraged to consider the recommendations put forward in this study, as well as other elements that must be included to achieve conservation, security and economic objectives.

It is also important to note that the success of implementing any ICS is dependent upon having the proper controls at the point of entry as well as supporting frameworks alongside it, such as MCS. ICS primarily concerns imports, as its name suggests, but properly regulating IUU fishing on the water means comprehensive MCS is necessary to keep illegal fishing activities at bay. MCS tools, such as electronic log-books to report catches to authorities in real time, VMS and AIS to know a vessel's location, as well as human observers and EM, aid in addressing verification. As such these MCS tools should be required and used to ensure compliance with ICS requirements by confirming that information collected at the point of catch or harvest is accurate and verifiable. Furthermore, improved overall fisheries transparency can substantially aid authorities of importing States in verifying the data provided in catch documentation. As such, importing market States should encourage exporting States to improve transparency and accountability in fisheries governance and management, in line with the Global Charter for Fisheries Transparency.¹⁰² Specifically, the collection and monitoring – and eventual publication – of beneficial ownership information for fishing fleets allows States to hold accountable those who are ultimately profiting from illegal activities. Flag States collection of beneficial ownership data on their fishing fleets and sharing of this data with market States would allow authorities to restrict market access to unscrupulous actors, especially repeat offenders.

¹⁰² Further information about the Global Charter for Fisheries Transparency is available at: <https://fisheriestransparency.net/>. Accessed 11.7.2024.

Annex

List of products excluded from the EU's catch certification scheme

Aquaculture products obtained from fry or larvae
Livers, roes, tongues, cheeks, heads and wings
Ornamental fish, live
Trout (<i>Salmo trutta</i> , <i>Oncorhynchus mykiss</i> , <i>Oncorhynchus clarki</i> , <i>Oncorhynchus aguabonita</i> , <i>Oncorhynchus gilae</i> , <i>Oncorhynchus apache</i> and <i>Oncorhynchus chrysogaster</i>), live, caught in freshwater
Eels (<i>Anguilla</i> spp.), live, caught in freshwater
Carp, live
Pacific salmon (<i>Oncorhynchus nerka</i> , <i>Oncorhynchus gorboscha</i> , <i>Oncorhynchus keta</i> , <i>Oncorhynchus tshawytscha</i> , <i>Oncorhynchus kisutch</i> , <i>Oncorhynchus masou</i> and <i>Oncorhynchus rhodurus</i>), Atlantic salmon (<i>Salmo salar</i>) and Danube salmon (<i>Hucho hucho</i>), live, caught in freshwater
Other freshwater fish, live
Trout (<i>Salmo trutta</i> , <i>Oncorhynchus mykiss</i> , <i>Oncorhynchus clarki</i> , <i>Oncorhynchus aguabonita</i> , <i>Oncorhynchus gilae</i> , <i>Oncorhynchus apache</i> and <i>Oncorhynchus chrysogaster</i>), fresh or chilled, excluding fish fillets and other fish meat of heading 0304, caught in freshwater
Pacific salmon (<i>Oncorhynchus nerka</i> , <i>Oncorhynchus gorboscha</i> , <i>Oncorhynchus keta</i> , <i>Oncorhynchus tshawytscha</i> , <i>Oncorhynchus kisutch</i> , <i>Oncorhynchus masou</i> and <i>Oncorhynchus rhodurus</i>), Atlantic salmon (<i>Salmo salar</i>) and Danube salmon (<i>Hucho hucho</i>), fresh or chilled, excluding fish fillets and other fish meat of heading 0304, caught in freshwater
Other <i>Salmonidae</i> , fresh or chilled, excluding fish fillets and other fish meat of heading 0304, caught in freshwater
Eels (<i>Anguilla</i> spp.), fresh or chilled, excluding fish fillets and other fish meat of heading 0304, caught in freshwater
Carp, fresh or chilled, excluding fish fillets and other fish meat of heading 0304
Tilapia (<i>Oreochromis</i> spp.), fresh or chilled, excluding fish fillets and other fish meat of heading 0304
Other freshwater fish, fresh or chilled, excluding fish fillets and other fish meat of heading 0304
Sockeye salmon (red salmon) (<i>Oncorhynchus nerka</i>), excluding livers and roes, frozen, excluding fish fillets and other fish meat of heading 0304, caught in freshwater
Other Pacific salmon (<i>Oncorhynchus gorboscha</i> , <i>Oncorhynchus keta</i> , <i>Oncorhynchus tshawytscha</i> , <i>Oncorhynchus kisutch</i> , <i>Oncorhynchus masou</i> and <i>Oncorhynchus rhodurus</i>), excluding livers and roes, frozen, excluding fish fillets and other fish meat of heading 0304, caught in freshwater
Trout (<i>Salmo trutta</i> , <i>Oncorhynchus mykiss</i> , <i>Oncorhynchus clarki</i> , <i>Oncorhynchus aguabonita</i> , <i>Oncorhynchus gilae</i> , <i>Oncorhynchus apache</i> and <i>Oncorhynchus chrysogaster</i>), excluding livers and roes, frozen, excluding fish fillets and other fish meat of heading 0304, caught in freshwater
Atlantic salmon (<i>Salmo salar</i>) and Danube salmon (<i>Hucho hucho</i>), excluding livers and roes, frozen, excluding fish fillets and other fish meat of heading 0304, caught in freshwater
Other <i>salmonidae</i> , excluding livers and roes, frozen, excluding fish fillets and other fish meat of heading 0304, caught in freshwater
Eels (<i>Anguilla</i> spp.), frozen, excluding fish fillets and other fish meat of heading 0304, caught in freshwater
Carp, frozen, excluding fish fillets and other fish meat of heading 0304
Other freshwater fish, frozen, excluding fish fillets and other fish meat of heading 0304

Fish fillets, fresh or chilled, of Nile perch (<i>Lates niloticus</i>)
Fish fillets, fresh or chilled, of pangasius (<i>Pangasius</i> spp.)
Fish fillets, fresh or chilled, of Pacific salmon (<i>Oncorhynchus nerka</i> , <i>Oncorhynchus gorbuscha</i> , <i>Oncorhynchus keta</i> , <i>Oncorhynchus tshawytscha</i> , <i>Oncorhynchus kisutch</i> , <i>Oncorhynchus masou</i> and <i>Oncorhynchus rhodurus</i>), Atlantic salmon (<i>Salmo salar</i>) and Danube salmon (<i>Hucho hucho</i>), caught in freshwater
Fish fillets, fresh or chilled, of the species <i>Oncorhynchus mykiss</i> weighing more than 400 g each, caught in freshwater
Fish fillets, fresh or chilled, of trout of the species <i>Salmo trutta</i> , <i>Oncorhynchus mykiss</i> (weighing 400 g or less), <i>Oncorhynchus clarki</i> , <i>Oncorhynchus aguabonita</i> and <i>Oncorhynchus gilae</i> , caught in freshwater
Fish fillets, fresh or chilled, of other freshwater fish
Other fish meat (whether or not minced), fresh or chilled, of freshwater fish
Frozen fillets of Nile perch (<i>Lates niloticus</i>)
Frozen fillets of pangasius (<i>Pangasius</i> spp.)
Frozen fillets of Tilapia (<i>Oreochromis</i> spp.)
Frozen fillets of Pacific salmon (<i>Oncorhynchus nerka</i> , <i>Oncorhynchus gorbuscha</i> , <i>Oncorhynchus keta</i> , <i>Oncorhynchus tshawytscha</i> , <i>Oncorhynchus kisutch</i> , <i>Oncorhynchus masou</i> and <i>Oncorhynchus rhodurus</i>), Atlantic salmon (<i>Salmo salar</i>) and Danube salmon (<i>Hucho hucho</i>), caught in freshwater
Frozen fillets of <i>Oncorhynchus mykiss</i> weighing more than 400 g each, caught in freshwater
Frozen fillets of trout of the species <i>Salmo trutta</i> , <i>Oncorhynchus mykiss</i> (weighing 400 g or less), <i>Oncorhynchus clarki</i> , <i>Oncorhynchus aguabonita</i> and <i>Oncorhynchus gilae</i> , caught in freshwater
Frozen fillets of other freshwater fish
Other fish meat (whether or not minced), frozen, of freshwater fish
Flours, meals and pellets of fish, fit for human consumption
Fish fillets, salted or in brine, of Pacific salmon (<i>Oncorhynchus nerka</i> , <i>Oncorhynchus gorbuscha</i> , <i>Oncorhynchus keta</i> , <i>Oncorhynchus tshawytscha</i> , <i>Oncorhynchus kisutch</i> , <i>Oncorhynchus masou</i> and <i>Oncorhynchus rhodurus</i>), Atlantic salmon (<i>Salmo salar</i>) and Danube salmon (<i>Hucho hucho</i>), caught in freshwater
Fish fillets, dried, salted or in brine, but not smoked, of other freshwater fish
Pacific salmon (<i>Oncorhynchus nerka</i> , <i>Oncorhynchus gorbuscha</i> , <i>Oncorhynchus keta</i> , <i>Oncorhynchus tshawytscha</i> , <i>Oncorhynchus kisutch</i> , <i>Oncorhynchus masou</i> and <i>Oncorhynchus rhodurus</i>), Atlantic salmon (<i>Salmo salar</i>) and Danube salmon (<i>Hucho hucho</i>), smoked, including fillets, caught in freshwater
Trout (<i>Salmo trutta</i> , <i>Oncorhynchus mykiss</i> , <i>Oncorhynchus clarki</i> , <i>Oncorhynchus aguabonita</i> , <i>Oncorhynchus gilae</i> , <i>Oncorhynchus apache</i> and <i>Oncorhynchus chrysogaster</i>), smoked, including fillets, caught in freshwater
Eels (<i>Anguilla</i> spp.), smoked, including fillets, caught in freshwater
Other freshwater fish, smoked, including fillets
Other freshwater fish, dried, whether or not salted, but not smoked
Pacific salmon (<i>Oncorhynchus nerka</i> , <i>Oncorhynchus gorbuscha</i> , <i>Oncorhynchus keta</i> , <i>Oncorhynchus tshawytscha</i> , <i>Oncorhynchus kisutch</i> , <i>Oncorhynchus masou</i> and <i>Oncorhynchus rhodurus</i>), Atlantic salmon (<i>Salmo salar</i>) and Danube salmon (<i>Hucho hucho</i>), in brine or salted but not dried or smoked, caught in freshwater
Other freshwater fish, in brine or salted but not dried or smoked
Freshwater crayfish, frozen
Flours, meals and pellets of crustaceans, frozen, fit for human consumption
Rock lobster and other sea crawfish (<i>Palinurus</i> spp., <i>Panulirus</i> spp., <i>Jasus</i> spp.), ornamental

Lobsters (<i>Homarus</i> spp.), ornamental, live
Shrimps and prawns of the family Pandalidae, ornamental, live
Shrimps of the genus Crangon, ornamental, live
Other shrimps and prawns, ornamental, live
Crabs, ornamental, live
Freshwater crayfish, live, fresh, chilled, dried, salted or in brine, in shell, cooked by steaming or by boiling in water, whether or not chilled, dried salted or in brine
Norway lobsters (<i>Nephrops norvegicus</i>), ornamental, live
Other ornamental crustaceans, live
Flours, meals and pellets of crustaceans, not frozen, fit for human consumption
Oysters, whether in shell or not, live, fresh, chilled, frozen, dried, salted or in brine
Scallops, including queen scallops, of the genera <i>Pecten</i> , <i>Chlamys</i> or <i>Placopecten</i> , live, fresh or chilled
Scallops, including queen scallops, of the genera <i>Pecten</i> , <i>Chlamys</i> or <i>Placopecten</i> , other than live, fresh or chilled
Mussels (<i>Mytilus</i> spp., <i>Perna</i> spp.), live, fresh or chilled
Mussels (<i>Mytilus</i> spp., <i>Perna</i> spp.), other than live, fresh or chilled
Cuttle fish (<i>Sepia officinalis</i> , <i>Rossia macrosoma</i> , <i>Sepioida</i> spp.) and squid (<i>Ommastrephes</i> spp., <i>Loligo</i> spp., <i>Nototodarus</i> spp., <i>Sepioteuthis</i> spp.), ornamental
Octopus (<i>Octopus</i> spp.), ornamental
Snails, other than sea snails, live, fresh, chilled, frozen, dried, salted or in brine
Other aquatic invertebrates other than crustaceans and those molluscs specified or included in subheadings 0307 10 10 to 0307 60 00, except <i>Illex</i> spp., cuttlefish of the species <i>Sepia pharaonis</i> and sea snails of the species <i>Strombus</i> , live (other than ornamental), fresh or chilled
Striped venus and other species of the family Veneridae, frozen
Jellyfish (<i>Rhopilema</i> spp.), frozen
Other aquatic invertebrates other than crustaceans and those molluscs specified or included in subheadings 0307 10 10 to 0307 60 00 and 0307 99 11 to 0307 99 15, except cuttlefish of the species <i>Sepia pharaonis</i> and sea snails of the species <i>Strombus</i> , including flours, meal and pellets of aquatic invertebrates other than crustaceans, fit for human consumption, frozen
Other aquatic invertebrates other than crustaceans and those molluscs specified or included in subheadings 0307 10 10 to 0307 60 00, except <i>Illex</i> spp., cuttlefish of the species <i>Sepia pharaonis</i> and sea snails of the species <i>Strombus</i> , including flours, meal and pellets of aquatic invertebrates other than crustaceans, fit for human consumption, dried, salted or in brine
Salmon, caught in freshwater , prepared or preserved, whole or in pieces, but not minced
Salmonidae, other than salmon, caught in freshwater , prepared or preserved, whole or in pieces, but not minced
Salmon, caught in freshwater , otherwise prepared or preserved (other than whole or in pieces, but not minced)
Salmonidae, other than salmon, caught in freshwater , otherwise prepared or preserved (other than whole or in pieces, but not minced)
Fillets of freshwater fish, raw, merely coated with batter or breadcrumbs, whether or not pre-fried in oil, frozen
Caviar substitutes
Freshwater crayfish, prepared or preserved
Other molluscs and other aquatic invertebrates, prepared or preserved

The Environmental Justice Foundation, Oceana, The Nature Conservancy, The Pew Charitable Trusts and WWF are working together to promote, align and strengthen traceability systems in key seafood markets in order to end illegal, unreported and unregulated (IUU) fishing.

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For more news, updates and documents supporting the EU to end IUU fishing, visit: www.iuuwatch.eu



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