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EJF vessel briefing: Chinese-flagged light seiner vessels operating in the Northwest Indian Ocean

Environmental Justice Foundation

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Abstract

This briefing details EJF's recent investigations into the fishing operations of 64 Chinese-flagged light seiners operating in the Northwest Indian Ocean (NWIO). These vessels are ostensibly targeting squid but - as documented by crew - are also routinely catching significant quantities of tuna and other marine species. These vessels operate in a regulatory vacuum with the fishing grounds falling within the geographic competence of the IOTC but outside its species mandate (regarding squid), and within the species mandate of the Southern Indian Ocean Fisheries Agreement (SIOFA) but outside its area of competence (AOC) (the Agreement Area). This is because the bulk of the recorded fishing activity occurs north of 10°00'N latitude or the edge of FAO Subarea 51.3.2 – where the Agreement Area ends. SIOFA also lacks a dedicated CMM on squid.

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[2] Documents available only to members invited to closed sessions.

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About the organisation:

The Environmental Justice Foundation (EJF) works internationally to inform policy and drive systemic, durable reforms to protect and restore our natural world and defend human rights.

We investigate and expose abuses and support environmental defenders, Indigenous peoples, communities and independent journalists on the frontlines of environmental injustice. Our investigators, researchers, filmmakers and campaigners work with grassroots partners and environmental defenders across the globe to secure sustainable, peaceful and equitable futures.

Our work to secure environmental justice aims to protect our global climate, ocean, forests, wetlands, wildlife and defend the fundamental human right to a secure natural environment, recognising that all other rights are contingent on this.

EJF is committed to combating illegal, unreported, and unregulated (IUU) fishing as well as associated human rights abuses in the fishing sector to achieve truly sustainable, legal and ethical seafood.

Introduction:

This briefing details EJF's recent investigations into the fishing operations of 64 Chinese-flagged light seiners[3] operating in the Northwest Indian Ocean (NWIO). These vessels are ostensibly targeting squid but - as documented by crew - are also routinely catching significant quantities of tuna and other marine species. At the time of writing, none of the 64 vessels were listed on the IOTC Record of Authorised Vessels, nor do they appear on any historical IOTC vessel list. These vessels operate in a regulatory vacuum with the fishing grounds falling within the geographic competence of the Indian Ocean Tuna Commission (IOTC) but outside its species mandate (regarding squid), and within the species mandate of the Southern Indian Ocean Fisheries Agreement (SIOFA) but outside its area of competence (AOC).

EJF's investigations have focused on assessing the prevalence of destructive fishing practices taking place on board these vessels, including shark finning and disposal of shark carcasses, and the intentional capture of vulnerable megafauna such as marine mammals. The briefing

[3] Light seiners using arrays of powerful lights to attract fish during night fishing operations (See page 2).

also analyses the extent to which these vessels have engaged in unregulated fishing for tuna and tuna-like species. Recent EJF investigations have uncovered multiple accounts from former crew of vessels intentionally targeting and harvesting significant quantities of tuna despite operating entirely outside the IOTC's regulatory framework.

Our investigations also reveal that living and working conditions on board these vessels are often appalling. Across the 106 crew members EJF interviewed, there was widespread evidence of forced labour as defined by the ILO, including physical abuse, verbal abuse, and other forms of labour exploitation.

This briefing presents evidence gathered from crew interviews, vessel tracking data, and open-source intelligence. It identifies the governance failures that have allowed these practices to persist unchecked since the fleet's emergence in 2015 and sets out recommendations for urgent reform by the IOTC, SIOFA, China as the dominant flag state, Indian Ocean coastal states, and port states.

Key findings:

- The number of vessels operating in the NWIO squid fishery increased from 30 vessels in 2015 to 361 in 2025 - an increase of 1,100% in 10 years.
- In early 2026, light seiners made up 97.3% of the fishing effort in the NWIO industrial squid fishery.
- EJF investigations across 64 light seiner vessels reveal a litany of alleged destructive fishing practices with shark finning recorded on 59% of vessels.
- Extremely high bycatch rates were recorded, with cetacean captures reported on 45.3% of vessels and turtle captures on 17.2% of vessels.
- Almost 70% of investigated vessels allegedly caught tuna and tuna-like species as one of the target species despite not being registered on the IOTC record of authorised vessels (RAV).
- Fishers told EJF that they would catch between 5-25 tonnes of tuna per day. Vessels would trans-ship 300-450 tonnes of tuna to reefer vessels on average every 1.5 months.
- Fishers reported shocking allegations of human rights abuses, with almost 40% of fishers reporting physical abuse.
- Over 90% of interviewed fishers reported excessive overtime, work with substandard/no wages, restriction of movement and isolation.
- The median interviewee reported 9 out of 12 indicators of forced labour, and over 90% of fishers reported at least 7 indicators of forced labour during their employment.
- Vessels are reportedly trans-shipping both their squid and tuna catches to refrigerated cargo vessels (reefers) which are also not registered on the IOTC RAV.
- Chinese news articles published in 2024 and 2025 corroborate EJF findings that these vessels are catching large quantities of tuna and tuna-like species in the NWIO. They also name vessels implicated by EJF investigations and describe hundreds of tonnes of tuna and “skipjack tuna” catch being unloaded by these vessels.[4]/[5]

[4] CNR (26th June 2024) The first batch of deep-sea fish caught this year is landed at Fuzhou Port, https://www.cnr.cn/fj/jdt/20240626/t20240626_526765596.shtml
[5] Fuzhou Customs (10th June 2025) Pingtan customs facilitates effective customs clearance for distant-water fish catches, http://manzhouli.customs.gov.cn/fuzhou_customs/484123/484124/6564010/index.html

What is light seining?

A photo allegedly taken on board a light seiner in 2019 shows two other light seiner vessels. The booms that carry the net along with the vessel superstructure, which holds the high-powered light rigs, are all visible.

Light seining is a fishing method in which vessels use powerful artificial lights to attract and aggregate photosensitive species at or near the sea surface, then encircle and harvest them with a seine net. The method exploits the phototactic behaviour (attraction to light) of target species and is typically conducted at night.[6]/[7]

Defining light seining as a fishing method — rather than a gear type or vessel category — is important because its effectiveness and impacts arise from a full operational system: the combination of high-intensity artificial light, net configuration, and nocturnal targeting of marine species that are attracted to light. In the NWIO context these include the purpleback flying squid (*Sthenoteuthis oualaniensis*) but also several tuna and tuna-like species. Technical documents from a Chinese fishing gear research institute describe the engineering basis for why falling nets are so effective at retaining tuna and tuna-like species:

'*As the diameter of the closed net is directly proportional to the depth to which the net is submerged, the maximum angle at which the net can prevent fish from escaping is 45 degrees. Tuna have the narrowest angle of ascent and descent among pelagic fish; they typically swim upwards at an angle of 50 to 60 degrees to hunt for food. As the netting of the enclosed net forms a tangent to the tuna's swimming path, the enclosed net is effective in preventing tuna from escaping. It is thus evident that this fishing gear and method not only captures phototactic (attracted to light) squid and other pelagic fish, but more importantly, is capable of catching tuna*'.[8]

[6] Trygg Mat Tracking (2021) Squid fishing in the Northwest Indian Ocean - Clear as ink, https://1ae03060-3f06-4a5c-9ac6-b5c1b4a62664.usrfiles.com/ugd/1ae030_45e0fa195f4f43fa9f0da3da2b78d8c3.pdf

[7] SCFS (2022) An investigation of large-size light falling net fishing vessels operating in the South China Sea based on VMS data, https://www.schinafish.cn/cn/article/id/75a1e0b3-4eb7-4f86-8710-37c46477221d

[8] Xie Yongqing (n.d.) Analysis of Safety Hazards on Light Seiners vessels. Available at: https://www.jessn.com/cn/productsnewsd.php?nid=997

Screenshot from a video allegedly taken onboard a light seiner in 2023 shows the high-powered lights warming up before fishing starts.

Light seiners commonly deploy either of two net types in combination with high-intensity lighting arrays: 'Dip nets (敷网)' and 'falling nets (罩网)'. The latter are becoming increasingly popular and can extend more than 300m out from the vessel to encircle schools of fish or squid. Due to the similarities between these two types of nets, vessels using either of these nets in combination with artificial lights are collectively referred to as 'light seiners' in this briefing.

Studies comparing squid-fishing performance in the NWIO have found light seiners to be the most efficient method across gear types assessed including squid jiggers.[9]/[10] However, because light seiners use long booms to extend their nets from one side of the vessel to the other, light seiners require calmer surface waters in order to avoid losing balance while operating.[11] This is one of the main reasons why light seiners can only be deployed to the relatively calm waters of the NWIO and the South China Sea.

Background of the fishery:

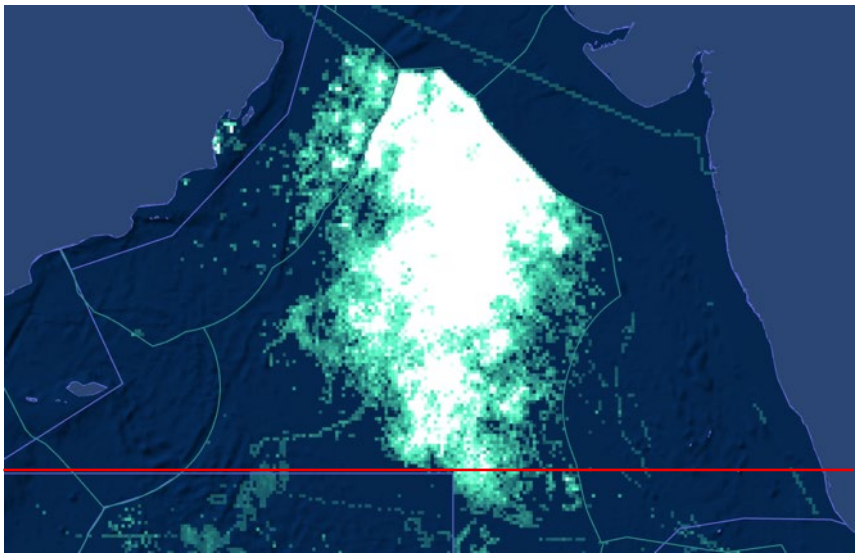
In 2017, Fish-i Africa released a report on a new fishing fleet appearing in the NWIO, with the first vessels detected in the region as early as 2015.[12] Subsequent reporting by Trygg Mat Tracking (TMT) and Global Fishing Watch (GFW) further explored the behaviours of this fleet.[13] The number of vessels fishing in the area had increased from 30 vessels in 2015 to 279 vessels in 2019.[14] Photos taken by Greenpeace during an at-sea expedition into the NWIO in May 2021 already documented several tuna specimens on the decks of these squid fishing vessels.

Over the last six years, total fishing effort in the NWIO is estimated to have increased by 78.6%, with light seiners accounting for a disproportionate share of that growth — their contribution exceeding 144%. In 2020, there was a mixture of fishing gears catching squid in the region, with 71% of the apparent fishing effort reported by only 88 light seiner vessels,

[9] Journal of Shanghai Ocean University (2021) Spatial and temporal distribution differences of squid fishing grounds in the northern Indian Ocean under different fishing methods, https://www.shhydxxb.com/html/shhy/2021/6/20210103264.htm
[10] Journal of Shanghai Ocean University (2021) Spatial and temporal distribution differences of squid fishing grounds in the northern Indian Ocean under different fishing methods, https://www.shhydxxb.com/html/shhy/2021/6/20210103264.htm
[11] Jessn (n.d.) Marine and offshore engineering equipment, https://www.jessn.com/cn/productsnewsd.php?nid=997
[12] Stop Illegal Fishing, Trygg Mat Tracking, and NFDS (2017) Squid capture in the Northwest Indian Ocean: Unregulated fishing on the high seas, https://1ae03060-3f06-4a5c-9ac6-b5c1b4a62664.usrfiles.com/ugd/1ae030_85d2f860ba8e4dda850ec83080571f69.pdf
[13] Trygg Mat Tracking (2021) Squid fishing in the Northwest Indian Ocean - Clear as ink, https://1ae03060-3f06-4a5c-9ac6-b5c1b4a62664.usrfiles.com/ugd/1ae030_45e0fa195f4f43fa9f0da3da2b78d8c3.pdf
[14] Trygg Mat Tracking (2021) Squid fishing in the Northwest Indian Ocean - Clear as ink, https://1ae03060-3f06-4a5c-9ac6-b5c1b4a62664.usrfiles.com/ugd/1ae030_45e0fa195f4f43fa9f0da3da2b78d8c3.pdf

19% by vessels with multiple gears (trawl nets combined with handlines), and 8% by squid jiggers. By 2025, Chinese light seiners accounted for 97.3% of the fishing effort from industrial squid vessels, with over 184 unique vessels contributing.[15]

The alleged target species of these vessels is the purpleback flying squid (*Sthenoteuthis oualaniensis*, hereafter referred to as the purpleback squid). The fishery covers a significant portion of Food and Agriculture Organisation (FAO) Major Fishing Area 51 and can be broken down into two main subareas - Subareas 51.3.2 (Arabian Sea (South Western)), and 51.4 (Eastern Arabian Sea, Laccadives).[16]



Global Fishing Watch's Apparent fishing effort (AIS) by Chinese-flagged vessels in the NWIO between 1st January 2024 and 1st March 2026. The red line at the bottom of the image indicates the northernmost boundary of the Southern Indian Ocean Fisheries Agreement (SIOFA).

As the map above shows, much of the recent NWIO Chinese-flagged fishing activity has been concentrated in the high seas immediately adjacent to Oman, Pakistan and India.

Purpleback squid play a crucial role within the NWIO marine food chain, serving as both predators and

Screenshot from a video allegedly taken on board a light seiner shows trays of squid. The timestamp indicates this photo was taken at 11:04 on the 19th March 2023.

[15] EJF (2026) Fishing effort calculations conducted by EJF researchers using Global Fishing Watch data.
[16] FAO (2026) Indian Ocean, Western (Major Fishing Area 51), https://www.fao.org/fishery/en/area/fao:51/en

prey for a wide variety of species.[17/18] Purpleback squid have also been found to be an important food source for yellowfin tuna, bigeye tuna and swordfish.[19] As has been well documented in several other important squid fisheries, when squid populations fluctuate, decline or disappear from areas, this can have ripple effects on the abundance of both prey and predator populations.[20]/[21]

Whilst the IOTC RFMO extends across this region regulating tuna fisheries, there is no RFMO that regulates squid fishing in this area of the NWIO (See page 7). The continued unregulated extraction of squid in the NWIO could therefore have severe impacts on the squid population, let alone the trophic impacts on tuna and tuna-like species populations under the management jurisdiction of the IOTC.[22]

Governance gaps:

Whilst the IOTC extends across the entire Indian Ocean and regulates 16 species of large migratory pelagics (tunas, mackerel, sailfish, marlins and swordfish), there is no RFMO that regulates squid fishing in the NWIO (north of 10°00'N latitude). The SIOFA mandate covers squid species; however, its boundary only extends as far north as 10°00'N latitude or the edge of FAO Subarea 51.3.2 (Arabian Sea (South Western)) - the NWIO. As of early 2026, SIOFA does not currently regulate squid in any part of its AOC. This means that the bulk of the fishing activity by the light seiner fleet (as confirmed by AIS tracks and fishing effort analysis) falls outside the scope of the SIOFA.[23] This creates a regulatory mandate gap between the IOTC and SIOFA within which these vessels are operating.[24]

The issue is compounded by a lack of substantive Chinese flag-state regulations to deter destructive or unethical fishing practices such as shark finning and the catching of vulnerable marine megafauna. Article 39 (4) of the Distant Water Fishery Management Regulation of People's Republic of China sets out punishable fishery offenses including: '*fishing using gear or methods prohibited by the coastal state or a regional fisheries management organisation (RFMO) with jurisdiction, or fishing for species, precious or endangered aquatic wildlife or other marine organisms prohibited by the coastal state or an RFMO with jurisdiction*'.[25] However, since the light seiner fleet is not registered with either the IOTC or SIOFA, its resolutions regarding tuna catches, bycatch, conservation and sustainability do not formally apply to the fleet. This reflects the governance gaps discussed earlier.

[17] FAO (2010) Cephalopods of the world: An annotated and illustrated catalogue of cephalopod species known to date, Volume 2, Myopsid and Oegopsid Squids, https://oceanrep.geomar.de/id/eprint/54055/1/4305.pdf
[18] Wen et al (2025) The effects of climate change on *Sthenoteuthis oualaniensis* habitats in the Northern Indian Ocean, https://www.mdpi.com/2076-2615/15/4/573
[19] Menard, F. et al (2006) New information from predator diets on the importance of two Ommastrephidae: Sthenoteuthis oualaniensis in the Indian Ocean and Hyaloteuthis pelagica in the Atlantic Ocean, https://horizon.documentation.ird.fr/exl-doc/pleins_textes/divers13-04/010057841.pdf
[20] Perez-Puig, H. et al (8th October 2024) The departure of sperm whales (*Physeter macrocephalus)* in response to the declining jumbo squid (*Dosidicus gigas)* population in the central portion of the Gulf of California, https://peerj.com/articles/18117/
[21] Takahashi, et al (2022) Impact of squid predation on juvenile fish survival, https://www.nature.com/articles/s41598-022-14389-2
[22] Coll, M. et al (15th October 2013) Assessing the trophic position and ecological role of squids in marine ecosystems by means of food-web models, Deep Sea Research Part II: Topical studies in oceanography, Volume 95, https://www.sciencedirect.com/science/article/abs/pii/S0967064512001609
[23] SIOFA (n.d.) Introduction to the Southern Indian Ocean Fisheries Agreement, https://siofa.org/
[24] Urrutia S. et al (2025) Untangling squid: Regulatory gaps and opportunities to improve high seas squid fisheries management, https://www.tandfonline.com/doi/abs/10.1080/00908320.2025.2458664
[25] MoJ (2020) Regulations on the management of Distant Water Fisheries, https://www.moj.gov.cn/pub/sfbgw/flfggz/flfggzbmgz/202101/t20210105_146468.html

Moreover, the Chinese government published a 'regulatory document' (the weakest type of legal document in China's fisheries management framework[26]) adopted from the major CMMs of each tuna RFMO in 2019[27] and updated it in 2022,[28] aiming at strengthening the compliance awareness of tuna fishing companies including registration, bycatch reduction, and documentation, etc. However, this document is currently not applicable to the light seiner fleet as it is a squid fishery rather than a tuna fishery. Essentially, light seiners operate within a regulatory void even when it comes to China's own fisheries legislation, allowing them to circumvent all current regulatory measures.

In 2024, the Chinese government published a 'White List' of high seas fishing vessels flagged to China.[29] After cross-referencing with our list of active fishing vessels in NWIO obtained via GFW, 200 out of the 231 (86.6%) light seiners were found to be registered to the Chinese authority for high seas fishing. Despite the publication of such a list, limited information was provided, i.e., vessel name and number, IMO number, vessel length and tonnage. Crucial information which could aid the monitoring, control and surveillance operations of coastal states in terms of identifying and prosecuting IUU fishing activities was missing. Such information would include beneficial ownership, gear type, target species and authorised fishing area. Moreover, to the best of EJF's knowledge, this list has not yet been updated since its initial publication.

[26] There are four tiers of legal documentations form the legal framework of fishery management for the People's Republic of China. *See* Greenpeace (2021) The current status and new ideas of China's marine fishing vessel management. Available at: https://www.greenpeace.org.cn/wp-content/uploads/2021/09/china-fishing-vessel-management-report.pdf. For instance, The Fisheries Law is the first tier of overarching documentation, while the numerous "regulatory documents" published every year and updated frequently belong to the lowest tier and are the weakest in terms of legal powers.

[27] Ministry of Agriculture and Rural Affairs (2022) Regulatory document on strictly adhering to international management measures for tuna, https://faolex.fao.org/docs/pdf/chn201047.pdf

[28] Ministry of Agriculture and Rural Affairs (2022) Regulatory document on strictly adhering to international management measures for tuna, https://faolex.fao.org/docs/pdf/chn201047.pdf

[29] Fisheries Administration Bureau (2024) List of Chinese-flagged fishing vessels operating on the high seas, https://www.agri.cn/zx/hxgg/202411/t20241112_8688571.htm

Recognition of the light seining fleet by the IOTC and SIOFA:

IOTC:

The light seiner fleet was discussed at the 2022 and 2023 meetings of the IOTC's Working Party on Ecosystems and Bycatch (WPEB) (WPEB18 and WPEB19, respectively). The 2022 report mentioned: (1) evidence of increased squid fishing operations on the high seas of the Indian Ocean, (2) that these fishing grounds overlap with tuna purse seine fleet areas, and (3) that this overlap results in bycatch of tuna and tuna-like species in the squid fishery. Crucially, the report flags that because these squid fisheries are not managed by the IOTC, catch data on tuna and tuna-like species taken as bycatch are not being reported to the IOTC at all.[30]

The WPEB's response was to recommend (via the Scientific Committee to the Commission) that Contracting Parties and Cooperating Non-Contracting Parties (CPCs) report all tuna catches to the IOTC regardless of the target species of the fishery, and to request the Compliance Committee seek more information on the fishery from CPCs. However, the Commission took no binding action, and the issue was not discussed in the subsequent 2023 WPEB19, 2024 WPEB20 or 2025 WPEB21 according to publicly available meeting reports.[31]/[32]/[33]

The Scientific Committee's report (SC27) in 2024 acknowledged the previous notes from WPEB18 with the explanation for no further action being taken that "Data submitted to the Compliance department at the Secretariat indicated that in most cases, only small pelagics and other non-IOTC species were being encountered by these vessels."[34] The topic was not discussed again at the SC28 meeting in 2025.

SIOFA:

China lists only four vessels on the SIOFA authorised vessel list as of the time of writing, with two of these being squid jiggers and two being fishery research and survey vessels.[35] None of the 231 light seiner vessels operating just north of the SIOFA boundary are registered with the RFMO.

China's light seining squid fleet is mentioned in the "main fisheries operating in the SIOFA area" as of the SIOFA's Overview of SIOFA Fisheries 2025 report. However, further details about the fishing area are described as "To be confirmed".[36] This slow pace of reform should be of grave concern to coastal states across the Indian Ocean, given that the environmental impacts of the light seiner fleet were first uncovered as early as 2015 and already recognised by intergovernmental processes as early as 2022.

[30] IOTC (2022) Report of the 18th working party on ecosystems and bycatch, https://iotc.org/documents/report-18th-working-party-ecosystems-and-bycatch
[31] IOTC (2023) Report of the 19th working party on ecosystems and bycatch, https://iotc.org/sites/default/files/documents/2023/11/IOTC-2023-WPEB19-R_E_rev2.pdf
[32] IOTC (2024) Report of the 20th working party on ecosystems and bycatch, https://iotc.org/sites/default/files/documents/2025/01/IOTC-2024-WPEB20AS-R_E_rev1.pdf
[33] IOTC (2025) Report of the 21st working party on ecosystems and bycatch, https://iotc.org/sites/default/files/documents/2025/11/IOTC-2025-WPEB21AS-R_rev1.pdf
[34] IOTC 2024) Report of the 27th session of the IOTC scientific committee, https://iotc.org/sites/default/files/documents/2025/04/IOTC-2024-SC27-RE_0.pdf
[35] SIOFA (n.d.) Authorised vessels, https://siofa.org/mcs/authorised-vessels/vessels?sort_by=field_vess_flag_value&sort_order=ASC
[36] SIOFA (2025) Overview of SIOFA Fisheries 2025, https://siofa.org/sites/default/files/files/SIOFA-Fisheries-Overview-2025_redacted.pdf

Investigation findings:

A full methodology is provided in Appendix 1.

Tuna bycatch as unregulated fishing: EJF has classified the tuna documented in this briefing as "unregulated" rather than "illegal" fishing because: 1) Under the FAO International Plan of Action to Prevent, Deter and Eliminate IUU Fishing (IPOA-IUU)[37], unregulated fishing includes fishing activities conducted "*in areas or for fish stocks in relation to which there are no applicable conservation or management measures and where such fishing activities are conducted in a manner inconsistent with State responsibilities for the conservation of living marine resources under international law*."; and 2) the IOTC has not adopted a CMM specifically addressing tuna bycatch in non-IOTC fisheries.

However, IOTC has previously listed non-IOTC-registered vessels on the IUU Vessels List for catching tuna and tuna-like species, while these species did not constitute their primary catch. In 2018, the IOTC considered and ultimately listed four fishing vessels — CHAICHANACHOKE 8, CHAINAVEE 54, CHAINAVEE 55, and SUPPHERMNAVEE 21 — that were not registered on the IOTC Record of Authorised Vessels but were documented trans-shipping IOTC-mandated species (bonito – also known as kawakawa, *Euthynnus affinis*[38]) to a carrier vessel in the Western Indian Ocean.[39] The total quantity of IOTC species trans-shipped was 14,444 kg — a fraction of the daily tuna catch reported by crew members interviewed for this briefing (See page 14).

The IOTC determined that the vessels contravened Resolution 17/03 (now superseded by Resolution 18/03 and subsequently 24/03) by harvesting tuna and tuna-like species in the IOTC without being registered on the IOTC Record of Authorised Vessels, and by trans-shipping with vessels not on the IOTC Record of Carrier Vessels. IOTC Resolution 24/03 states that a vessel is presumed to have engaged in IUU fishing activities if it has "engaged in fishing or fishing-related activities[40] and is neither registered on the IOTC Record of Authorised Vessels … nor recorded in the Active list of vessels"; it has failed to record or report its catches to the IOTC; or used prohibited fishing gear, amongst other possible infractions.[41]

This case demonstrates that the IOTC has the institutional mechanism to act against unregistered vessels harvesting IOTC species, even when such catch is not their primary one, leaving no shield from IUU listing to such vessels that are not registered in the IOTC Record of Authorised Vessels. Moreover, the evidence presented in this briefing documents tuna catch at a scale order of magnitude greater than the case that triggered IUU listing in 2018 (See page 14).

Destructive/unethical fishing practices: The shark finning, catching of IOTC-prohibited species, and interactions with vulnerable megafauna documented here are described as "destructive fishing practices" rather than violations of IOTC resolutions for a parallel reason. IOTC resolutions such as Resolution 25/08 on sharks, and Resolution 12/04 on

[37] FAO (2001) International plan of action to prevent, deter and eliminate illegal, unreported and unregulated fishing, https://openknowledge.fao.org/server/api/core/bitstreams/a80c3bfb-1d5b-4ee6-9c85-54b7e83986a2/content
[38] IOTC (n.d.) Competence: Area & Species, https://iotc.org/about-iotc/competence
[39] IOTC (2018) The IOTC draft IUU vessels list, https://iotc.org/sites/default/files/documents/2018/05/IOTC-2018-CoC15-09E_-_DRAFT_IOTC_IUU_VESSELS_LIST.pdf
[40] As per Resolution 24/03: 'Fishing' means searching for, attracting, locating, catching, taking or harvesting fish or any activity which can reasonably be expected to result in the attracting, locating, taking or harvesting of fish; 'fishing related activities' means any operation in support of, or in preparation for, fishing, including landing, packaging, processing, transhipment or transport of fish and/or fish products that have not been previously landed at a port, as well as the provisioning of personnel, fuel, gear, food and other supplies at-sea.
[41] IOTC (2024) Resolution 24/03 on establishment of a list of vessels presumed to have carried out illegal, unreported and unregulated fishing in the IOTC area of competence, https://iotc.org/sites/default/files/documents/compliance/cmm/iotc_cmm_2403.pdf

marine turtles (see Appendix 2) — bind only IOTC CPCs and vessels on the IOTC Record of Authorised Vessels. Because the light seiner fleet is not registered with the IOTC, these resolutions do not apply. China's regulatory document to ensure DWF operational compliance with the major CMMs of each tuna RFMO also does not apply to the light seiner fleet meaning that any potential violations of Chinese regulations cannot be classified as IUU fishing.[42]

This ultimately results in the light seiner fleet operating within a governance vacuum, counter to a multitude of conservation and management measures which have been enacted in the area with the clear purpose of protecting and managing the very set of species these vessels are targeting.

Alleged destructive fishing and unregulated fishing practices:

According to fishers, 62 vessels targeted squid as their main target species (96.8%). 44 vessels also caught "tuna" or specifically "skipjack tuna" as part of their catch (68.8%). Mackerel was also listed as one of the main target species with 33 vessels reportedly catching mackerel (51.6%). However, 41.3% fishers also answered "all kinds of fish" when asked about target species (26 vessels). This means that the percentage of vessels catching tuna is likely to be higher. Occasionally, some vessels also caught yellowfin tuna however it seems this was not a target species.

A fisher poses with what appears to be a bigeye thresher shark on the deck of a light seiner. This would be a potential violation of IOTC Resolution 25/08 on the retention of thresher sharks.

[42] Ministry of Agriculture and Rural Affairs (2022) Regulatory document on ensuring compliance with international conventions on tuna fisheries, https://faolex.fao.org/docs/pdf/chn208246.pdf

Table 1: Summary of the alleged destructive fishing practices reported by fishers working on light seiner vessels operating within the NWIO. The IOTC CMMs that these practices would be in contravention of are also provided.

Destructive fishing practices	**Relevant IOTC Resolution**	**Number of vessels (n=64)**	**% (n=64)**
Removal of shark fins from bodies whilst onboard	25/08[43]	37	57.8
Shark finning for onwards sales[44]	25/08	23	35.9
Killing of vulnerable megafauna		35	54.7
Dolphins	23/06[45]	27	42.2
Turtles	12/04[46]	11	17.2
Manta rays	19/03[47]	6	9.4
Whale sharks	25/08	4	6.3
False killer whales	23/06	2	3.1

[43] IOTC (2025) Resolution 25/08 on the conservation of sharks caught in association with fisheries managed by IOTC, https://iotc.org/sites/default/files/documents/compliance/cmm/iotc_cmm_2508_0.pdf

[44] Fishers were asked whether shark fins were only used for onboard consumption by the crew, or whether the amount was enough to be put into sacks and to be transported by senior officers back to land for onward sale.

[45] IOTC (2023) Resolution 23/06 on the conservation of cetaceans, https://iotc.org/sites/default/files/documents/compliance/cmm/iotc_cmm_2306.pdf

[46] IOTC (2012) Resolution 12/04 on the conservation of marine turtles, https://iotc.org/sites/default/files/documents/compliance/cmm/iotc_cmm_12-04_en.pdf

[47] IOTC (2019) Resolution 19/03 on the conservation of mobulid rays caught in association with fisheries in the IOTC area of competence, https://iotc.org/sites/default/files/documents/compliance/cmm/iotc_cmm_1903_0.pdf

When compared to destructive fishing prevalence rates amongst the largest EJF squid vessel dataset, the NWIO light seiner fleet stands out as having some of the worst rates for shark finning and catching of vulnerable marine megafauna (See Table 2 below).

A photo allegedly taken onboard a light seiner shows what appear to be at least 13 silky sharks with their fins already removed.

The timestamp indicates this photo was taken at 6:00 on the 8th May 2024.

Table 2: Prevalence rates for shark finning and catching of charismatic species across three major squid fisheries.

Destructive fishing practice reported by fisher	NWIO light seiners (n=64)	Southeast Pacific (n=60)	Southwest Atlantic (n=101)
Shark finning	**37 vessels (57.8%)**	35 vessels (58.3%)	25 vessels (24.7%)
Catching of charismatic species (seals, cetaceans, turtles, whale sharks)	**35 vessels (54.7%)**	20 vessels (33.3%)	27 vessels (26.7%)

Catching of vulnerable marine megafauna:

Contrary to previous scientific reports that light seiners are highly selective in terms of target species,[48] EJF's investigations document widespread interactions with vulnerable marine megafauna. Over half of vessels surveyed (51.6%) reported encircling and capturing sea turtles; 65.6% reported interactions with cetaceans including dolphins and false killer whales; 11% with whale sharks; and 14% with manta rays.

Beyond incidental interaction, EJF's findings point to a more serious pattern of retention. In total, 35 light seiners (55.5%) were alleged to have deliberately captured, harmed, or retained vulnerable marine megafauna. These rates were substantially higher than in other squid fisheries assessed by EJF: the SEP recorded 33.3%, the SWA 26.7%, and the NWP just

[48] Journal of Shanghai Ocean University (2021) Spatial and temporal distribution differences of squid fishing grounds in the northern Indian Ocean under different fishing methods, https://www.shhydxxb.com/html/shhy/2021/6/20210103264.htm

6.7%, placing the NWIO fleet as the most severely implicated across all four fisheries examined.

"*EJF: What was done to this whale shark?*

Fisher: It was killed. When it entered the net and was lifted, it was still alive.

EJF: What happened next?

Fisher: After that, it was put inside the fish hold. After it died, then it was dumped.

EJF: So, the fish was kept overnight (on the vessel)?

Fisher: Yes, it was kept overnight.

EJF: Why was it kept overnight? Why didn't your vessel dump it right away?

Fisher: I'm not sure, I didn't understand their language." - Interview with an Indonesian fisher working onboard a Chinese-flagged light seiner vessel, July 2025.

A photo allegedly taken onboard a light seiner appears to show a juvenile whale shark on the deck of the vessel (In potential violation of Resolution 25/08). The photo timestamp indicates this was taken on the 20th January 2021.

Fishers told EJF that pods of dolphins could be attracted by the lights and fish. As the nets were deployed, they became trapped. Since the fishing operation can take several hours, by the time the nets were lifted, the animals were already dead.

"*We dumped dolphins back into the ocean. Most of them were dead when released back to the ocean. Once, we caught up to four dolphins in one haul*." – Interview with an Indonesian fisher working onboard a Chinese-flagged light seiner vessel, February 2026.

Dolphin and turtle meat was frequently used as bait to attract squid. In the case of dolphins, it was said that other dolphins would stay away from the vessel on smelling the blood of their own kind. The wounded or dead animals would be tied to the side of the vessel. This kind of inhumane fishing practice sometimes resulted in the prolonged suffering of animals for weeks.

"Dolphin meat is also used as a deterrent so that other dolphins will stay away. Because they eat squid [they are unwanted by the fishing vessel]." – Interview with a Filipino fisher working onboard a Chinese-flagged light seiner vessel, September 2023.

"I have a video of a turtle being used as bait. It was only used once. The turtle was accidentally caught in the net, we wanted to help release it, but the captain directed us to use it as bait. It was there for almost three months, the turtle was severely wounded. The turtle attracted many squids and fishes, we had a great catch." – Interview with an Indonesian fisher working onboard a Chinese-flagged light seiner vessel, June 2023.

A photo allegedly taken on board a light seiner shows at least five dolphins on the vessel's deck (Right). A photo allegedly taken aboard a light seiner appears to show a dolphin. The highlighted individual was identified as one of the Chinese senior crew. The timestamp indicates this photo was taken on the 11th June 2025 (Below). These retentions would be in potential violation of Resolution 23/06.

Catching of tuna:

"*If I calculate the total catch between tuna and squids, tuna make up 75% of the catch, while squids make up 25% of the catch. This is based on the calculation of the storage occupied by those types of catches… Most of the hauling involves lifting a mix of tuna and squid. Tuna-like species are dominant, while squid are usually at the bottom layer below the tuna-like species. For one-time hauling during a normal session, for tuna-like species, the amount could be up to 100 pans/trays, as the weight of each tray is 23kg for tuna and 25kg for squid*." - Interview with an Indonesian fisher working onboard a Chinese-flagged light seiner vessel, June 2025.

Fishers told EJF that their vessels caught tuna and tuna-like species - sometimes in vast quantities. Photographic evidence secured by EJF has helped to corroborate these accounts with some photos showing more than 1,000 individuals, all of which appear to be either tuna or tuna-like species under the management mandate of the IOTC.[49]

Light seiners in the NWIO are equipped with two sets of lights, one set of green lights which are submersible and one set of white lights. Crew told EJF that the lights would be turned on in sequence before the nets would be lowered around the fish and other marine animals attracted to the lights.

Tuna species such as skipjack, yellowfin and bigeye tuna are known to be attracted to lights at night.[50] This is partially due to the 'food chain effect' whereby the lights attract microscopic plankton which in turn attract baitfish (squid, anchovies, and sardines). These aggregations can then attract pelagic species (tuna and tuna-like species), which feed on the baitfish.[51]/[52] Tuna species have also been found to congregate nearer the surface during the night and are even most active in their hunting behaviours at dusk and dawn.[53]

"*There were two lights, the white one was above, and the green one was under [the water] [...] To attract the fish. Because at night, the fish like [to swim] in the bright light […] The fish that are attracted to green lights were the cob, squid, and skipjack tuna."* - Interview with an Indonesian fisher working onboard a Chinese-flagged light seiner vessel, October 2025.

Tuna have also been found to be highly sensitive to different light colours, with their photoreceptors especially sensitive to blue-green light. Green light has also been found to have the highest bycatch rates with blue sharks and sea turtles being attracted to this light more than other colours.[54]

[49] IOTC (n.d.) Competence: Area & Species, https://iotc.org/about-iotc/competence
[50] WCFPC (2012) Study on the methods to mitigate the bycatch of juvenile bigeye tuna by introducing Double-FADs with light stimulus for tuna purse seine fishery in the Western and Central Pacific Ocean, https://meetings.wcpfc.int/node/7836
[51] Nguyen, K.Q. et al (2018) Artificial light in commercial industrialised fishing applications: A review, https://www.tandfonline.com/doi/full/10.1080/23308249.2018.1496065
[52] FAO (1976) Fishing manuals: Fishing with light, https://www.fao.org/4/ah827e/ah827e03.pdf
[53] Jauharee A.R, et al, 2021) Tuna behaviour at anchored FADs inferred from Local Ecological Knowledge (LEK) of pole-and-line tuna fishers in the Maldives, https://pmc.ncbi.nlm.nih.gov/articles/PMC8321119/
[54] Afonso, A.S. et al (2021) The effect of light attractor color in pelagic longline fisheries, https://www.sciencedirect.com/science/article/abs/pii/S0165783620303398

Estimated tuna catches by light seiners:

EJF investigators designed a series of questions aimed to cross-reference and estimate the amount of tuna catch. Questions included asking about the number of hauls per day, number of fish trays with tuna per haul or per fishing day, the weight of each tuna tray, number of sacks containing frozen fish blocks that were being trans-shipped, and the frequency of trans-shipment. In total, nine fishers who worked on seven light seiners provided this detailed information.

The number of hauls per day varied among fishing vessels, seasonality and location, with a median of 6 hauls per day. During high seasons, the net could be deployed more than 10 times a day. For each haul, the fishers reported they could get up to 1-2 tonnes of skipjack or kawakawa (*Euthynnus affinis*[55]*)*, which equates to about 10-15 tonnes of fish per day.

This is within the reasonable range of catch since the crew also reported having to prepare 200-1,000 trays of small tuna and tuna-like species per fishing day before sending these into the blast freezer. This is equivalent to about 5-25 tonnes of fish per day. This is comparable to the equivalent daily catch of an IOTC registered purse seine vessel.[56]/[57] Each frozen fish block was then packed into plastic sacks and stored in one of the three to four freezer holds onboard.

The fishers reported that they would trans-ship 300-450 tonnes of tuna (including small and large tuna species) during one trans-shipment event. This is also within a reasonable range since the median of trans-shipment frequency is 1.5 months with a minimum 0.5 and maximum of two months. It could take one vessel 17-85 days to accumulate 300-450 tonnes of tuna before trans-shipment, assuming the daily catch level ranges between 5-25 tonnes.

Two Chinese news articles published in June 2024, and June 2025 respectively corroborate EJF findings that these vessels are catching large quantities of tuna and tuna-like species. The 2024 article describes how a number of light seiner vessels (including the Fu Yuan Yu 8771 which EJF has interviewed two former fishers from in 2023) unloaded 560 tonnes of “squid, skipjack tuna (Known as “bomb fish” in Chinese - 炸弹鱼) and sardines from the Indian Ocean…”[58] The 2025 article (Appendix 3) describes how the Fu Yuan Yu 8896, Fu Yuan Yu 8897, Fu Yuan Yu 8898, and Fu Yuan Yu 8899 unloaded “671 tonnes of frozen squid, frozen skipjack tuna…” into port.[59] The vessels are described as having fished on the “high seas of the Indian Ocean”. EJF interviewed one former fisher from the Fu Yuan Yu 8896 in 2024.

Several of the fishers that EJF spoke to reported that they would haul in the nets throughout the night, often until the early morning. For example, several photos allegedly taken

[55] IOTC (n.d.) Competence: Area & Species, https://iotc.org/about-iotc/competence
[56] IOTC (2024) Catch and effort data - surface fisheries, https://iotc.org/WPEB/2001/Data/05-CESurface
[57] EJF (2026) EJF corroborated this comparison with a representative from the IO tuna purse seine fleet.
[58] CNR (26th June 2024) The first batch of deep-sea fish caught this year is landed at Fuzhou Port, https://www.cnr.cn/fj/jdt/20240626/t20240626_526765596.shtml
[59] Fuzhou Customs (10th June 2025) Pingtan customs facilitates effective customs clearance for distant-water fish catches, http://manzhouli.customs.gov.cn/fuzhou_customs/484123/484124/6564010/index.html

onboard these light seiners have dawn-like lighting conditions and timestamps are consistently around 6am, just after the nets would have been hauled in.

"*In the morning. Basically, towards the morning. When there were almost no squid, then the [large] tuna would appear.*" – Interview with an Indonesian fisher working onboard a Chinese-flagged light seiner vessel, February 2026.

"*Usually, at dawn there would be [large] tuna caught in [the nets...] At 5 AM usually tuna would pass by. The tuna was mainly in Oman Waters, Arabian Sea*." – Interview with an Indonesian fisher working onboard a Chinese-flagged light seiner vessel, February 2026.

A photo allegedly taken on board a light seiner shows what appear to be 16 tuna fish. A number of these appear to be yellowfin tuna. The timestamp indicates this photo was taken at 6:00 on the 8th May 2024, just after sunrise.[1] Available AIS tracks on Starboard place the vessel in the Arabian Sea/NWIO on this date (16.0939 N, 68.1977 E).

The use of artificial lights on vessels targeting tuna is already prohibited in the IOTC area by Resolution 16/07.[60] This Resolution was adopted specifically to "mitigate possible negative effects [of lights] on the ecosystem, including on juveniles [tuna] and the incidental bycatch of non-target species, particularly sharks and marine turtles…".

A Chinese regulatory document published in 2022 broadly ensuring Chinese-flagged DWF tuna fishing operations are compliant with international tuna fisheries regulations also states that "Fishing vessels operating in the Indian Ocean are prohibited from installing or using artificial light sources, either above or below water, for the purposes of attracting fish, to catch tuna and tuna-like fish."[61] However, since light seiners are not considered as tuna vessels by the Chinese government, the application of this regulatory document on the light seiner fleet is unknown.

[60] IOTC (2016) Resolution 16/07 on the use of artificial lights to attract fish, https://iotc.org/sites/default/files/documents/compliance/cmm/iotc_cmm_16-07_en.pdf
[61] Ministry of Agricultural and Rural Affairs (2022) Notice on Ensuring Compliance with International Conventions on Tuna Fisheries. Available at: https://faolex.fao.org/docs/pdf/chn208246.pdf

The large-scale targeting of tuna and tuna-like species by light seiner vessels has significant implications for fish population assessments and ecosystem impacts. EJF's findings demonstrate that light seining cannot be characterised as a squid-fishing method with just incidental tuna bycatch - the method is structurally effective against multiple commercially and ecologically significant species, including tuna and tuna-like species that fall under the management jurisdiction of the IOTC.

A photo allegedly taken onboard a light seiner shows several fishers repairing the lighting rig. The fisher was onboard the vessel from October 2024 to May 2025.

<u>Evaluating possible justifications for the tuna catch</u>

The only possible justification for these vessels' actions may be that the tuna were merely bycatch alongside the main target species, purpleback squid, and were not retained for commercialisation. However, this argument falters given that:

- The combination of net gears, FADs (in some cases - See page X), and high-powered lights is highly effective at attracting tuna and tuna-like species. This makes significant tuna catch inevitable and foreseeable.
- Tuna and tuna-like species were retained on deck and not immediately discarded to prevent retention.
- Tuna and tuna-like species were systematically processed, packaged and methodically frozen to preserve the fish.
- Tuna and tuna-like species were then trans-shipped to reefer vessels at the same time as the target species, squid.

"*For small tuna species, we did not process them. Just arranged them in the metal tray, then froze them and packed them into sacks. While big tuna species were processed by cleaning the guts first, cutting the fins, and cleaning part of the gills.*" - Interview with an Indonesian fisher working on a Chinese squid vessel, June 2025.

A photo allegedly taken aboard a light seiner shows workers packing what appear to be skipjack tuna into boxes. The sheer number of tuna on deck would suggest intentional capture whilst the packing of fish into

boxes would suggest commercial intent rather than bycatch. The fisher who took the photo worked on the vessel from September 2024 to May 2025.

Dumping of unwanted/undervalued fish:

To maximise the financial return, and according to fishers, captains constantly chose to retain valuable species and discard lower-grade fish. Three out of the nine fishers (33.3%) who received our follow-up interview questions focusing on catch composition, reported that they participated in the dumping of unwanted fish. For instance, a fisher shared that if the catch comprised 60% tuna, 20% squid, and the remaining 20% was "unwanted" fish, the latter fish would be dumped.

"There was a time when the catch was so plentiful. The storage rooms were so full, and there's no space to store more fish. Until it reached noon, it was still piling up. It smelled, they were rotting [...], and then we threw it, as the captain told us [...] because it can no longer fit in the freezer. This happened twice." - Interview with a Filipino fisher working onboard a Chinese-flagged light seiner vessel, March 2025.

"*Due to the large number of fish, we sometimes caught a lot at once. Under the captain's orders, we were instructed to only keep skipjack tuna because its price was better. As a result, mackerel or kawakawa tuna were discarded. So, on those days, our workload doubled because we had to throw them away.*" - Interview with an Indonesian fisher working onboard a Chinese-flagged light seiner vessel, February 2026.

"*Yes. Often [dumped]. The likes of anchovies, the small fish, were often caught, and they were thrown away. Also fish like pufferfish, crabs, and small mackerel. Sometimes, they were also discarded when they were too small. We caught a lot of them, and they were thrown away. From what I know, perhaps half [of the fish] in the net… [were dumped]*." - Interview with an Indonesian fisher working onboard a Chinese-flagged light seiner vessel, February 2026.

At-sea trans-shipment:

Fishers reported that the tuna would be trans-shipped at sea to refrigerated cargo vessels (reefers), often at the same time as the squid and other fish catches. A number of these reefers (See Table 3 below) are not found on either the active or historical list of IOTC authorised vessels.[62]

"*All of the catch is sent to the collecting vessel, including frigate tuna, skipjack, and squid… In one transfer to the collecting vessel, we can have around 17,000 sacks of all tuna species combined. For large-sized tuna, the amount is approximately 1,000 sacks.*" - Interview with an Indonesian fisher onboard a Chinese-flagged light seiner squid vessel, April 2025.

Table 3: A selection of reefers suspected of trans-shipping with some of the light seiner vessels in this briefing, as identified by photographic or video evidence supplied by fishers.[63]

Fishing vessel	Reefer name (IMO)	Reefer flag	Reefer IOTC authorisation	Date of alleged trans-shipment
Lu Rong Yuan Yu 902	LU RONG YUAN YU YUN 008 (9882803)	China	Never	7th November 2024

[62] IOTC (2026) IOTC Record of Authorised Vessels and IOTC Record of Carrier Vessels, https://iotc.org/vessels
[63] IHS Maritime & Trade (n.d.) 'S&P Global Maritime Portal', https://maritime.ihs.com/ (accessed 16 December 2025).

Lu Rong Yuan Yu 902	LU RONG YUAN YU YUN 009 (8786466)	China	Never	25th March 2025
Fu Yuan Yu 8572	Fu Yuan Yu 67 (IMO: 8581971)	China	Never	19th December 2022
Fu Yuan Yu 8572	Fu Yuan Yu Yun 266 (IMO: 9926764)	China	Never	1st February 2023
Fu Yuan Yu 8572	Fu Yuan Yu Yun 979 (IMO: 8786478)	China	Never	23rd March 2024
Fu Yuan Yu 8783	Fu Yuan Yu 67 (IMO: 8581971)	China	Never	9th November 2024*

* A video taken by the fisher did not have a timestamp however Starboard AIS records indicate a possible trans-shipment between these two vessels on the 9th November 2024.

Use of fish aggregation devices:

One fisher from a Chinese-flagged light seiner told EJF that their vessel built and used drifting fish aggregation devices (DFADs) to yield more catch.

"*The vessel used FADs during fishing operations in the NWIO. The FADs were being used for approximately four months (January–April 2025) during the fishing season. The use of FADs significantly increased catch volumes… The FADs used were non-detachable (non-separable) and were constructed onboard by the crew under the captain's instructions. The materials used included rope and sacks*." - Interview with an Indonesian fisher onboard a Chinese-flagged light seiner squid vessel, November 2025.

Another fisher told EJF that they did not make their own DFADs, but they did retrieve and use previously used DFADs that had been abandoned, lost or discarded to "attract more fish".

" *We didn't deliberately create the FADs, but we often find displaced FADs at sea. When we find those, we usually collect them and attach them to the vessel to attract more fish. We often use the FADs during our operation*." - Interview with an Indonesian fisher onboard a Chinese-flagged squid vessel, November 2025.

The IOTC's Resolution 24/02 on management of drifting fish aggregating devices (FADs) in the IOTC AOC states that "only purse seine vessels and associated supply vessels" may deploy DFADs.[64] This would suggest that these light-seining squid vessels are in contravention of this Resolution.

Alleged human rights violations:

[64] IOTC (2024) Resolution 24/02 on management of drifting fish aggregating devices (FADs) in the IOTC area of competence, https://iotc.org/sites/default/files/documents/compliance/cmm/iotc_cmm_2402.pdf

Light seiners have been marketed as being able to reduce labour intensity of fishing operations[65], however, this is not the case from the interviews conducted by EJF. Vessels have also been implicated in egregious labour abuses, with fishers recounting being victims of or witnesses to physical or verbal abuse and several other indicators of forced labour. 16 fishers told EJF about eight deaths occurring during their time on board, strengthening a disturbing narrative of negligence, lack of transparency and noncompliance with either flag state regulations or international labour standards.

EJF screened its 106 interview results against 12 International Labour Organization (ILO) forced labour (FL) indicators, referring specifically to the organisation's framework for detecting FL in the context of industrial fishing activities.[66]

EJF identified the following indicators:

Table 4: Summary of the alleged HR/labour abuses on light seiner vessels operating within the NWIO.

Total fishers interviewed	**106**	**% (n=108*)**
Number of testimonies*	**108***	
Number of unique vessels that interviewees reported working on	**64**	
FL indicators	**Number of testimonies**	**%**
Excessive overtime	105	97.2%
Work with substandard or no wages	105	97.2%
Restriction of movement	100	92.6%
Isolation	99	91.7%
Debt bondage or manipulation of debt	93	86.1%
Abusive working and living conditions	92	85.2%
Deception	89	82.4%
Withholding of wages or other promised benefits	85	78.7%
Abuse of vulnerability	73	67.6%
Retention of identity documents	74	68.5%

[65] Qian J., et al (2022) Spatial-temporal distribution of large-size light falling-net fisheries in the South China Sea, https://www.frontiersin.org/journals/marine-science/articles/10.3389/fmars.2022.1075855/full

[66] "Towards freedom at sea: Handbook for the detection of forced labour in commercial fishing," *ILO*, March 31, 2026, https://www.ilo.org/publications/towards-freedom-sea-handbook-detection-forced-labour-commercial-fishing.

Physical and sexual violence	42	38.9%
Intimidation and threats against workers or workers' relatives	17	15.7%
Number of deaths *recorded* by interviewees	8**	9.5%

* Two fishers interviewed by EJF shared testimonies of working on two different vessels under one contract period. EJF differentiates each interviewee's work experience on different vessels, as they may indicate different FL indicators. This explains why we interviewed 106 fishers but have 108 testimonies.

** Eight *recorded* deaths across 16 different testimonies.

Table 4 demonstrates just how ubiquitous labour abuse is amongst fishers with four indicators of abuse being recorded by over 90% of interviewees. Eight crew deaths were reported to EJF by 16 different fishers who worked on seven unique vessels.

The median number of forced labour indicators per interview was nine and 91% of fishers reported at least seven indicators of abuse. When compared to forced labour prevalence rates amongst the largest EJF dataset, the NWIO light seiner fleet stands out as having some of the worst rates of forced labour and violence.

Fishery where EJF has conducted investigations	Median reported indicators of abuse out of 12 indicators	% of fishers reporting at least 7 indicators	Physical violence rate (%, n=x)
NWIO light seiners	**9/12**	**91%**	**37.7% (n=101)**
Southeast Pacific	9.5/12	89%	43% (n=72)
Southwest Atlantic	8/12	64.2%	25% (n=232)
Northwest Pacific	8/12	72.8%	24.3% (n=103)

Table 5: A comparison of the median indicators reported by interviewees shows that the NWIO fishery scores higher in terms of labour abuse in almost every measure.

Deaths at sea recorded on almost 10% of vessels

Following the larger pattern of deaths among Indonesian and Filipino migrant fishers working on DWF fleets, EJF has identified eight deaths reportedly occurring onboard seven light seiner vessels. Four deaths are classified as so-called "passive" deaths - ones that were identified by crew members suffering from prolonged, often preventable illness and the decline in their overall health prior to

their deaths[67] - while the other two were prompted by natural causes.[68] EJF also recorded two "active" deaths on the same vessel - one suicide of an Indonesian fisher and one work accident. Both fishers went overboard, and their bodies were never found.

Varying degrees of negligence by vessel officers toward their crew members' well-being contributed to these deaths, which EJF found to be driven by, among others, the trickled-down pressure on vessel captains to meet catch target, the high logistical and operational costs to make port visits[69] every time crew members reported sick, and the lack of oversight and enforcement of minimum labour standards from coastal states, the flag state's authorities, or relevant RFMOs.

This negligence took various forms, as seen, for instance, in the abusive living and working conditions, restriction of movements, and isolation - meaning virtually no access to any meaningful grievance or complaint mechanism - to which crew members are subjected. At times, these also combined with physical abuse and intimidation or threats against fishers.

Table 6: Summary and identification of the eight crew members' deaths

Fisher no.	**Vessel name**	**Interviewee's time on board**	**Suspected cause of death (as reported by EJF interviewees)**
Fisher 1	FU YUAN YU 8587	September 2024 – May 2025	Natural causes (heart attack)
Fisher 2	LU RONG YUAN YU 902	September 2024 – June 2025	Natural causes (food poisoning)
Fisher 3	LU QING YUAN YU 625	September 2024 – March 2025	Multiple symptoms of beriberi
Fisher 4	FU YUAN YU 8771	September 2022 – June 2023	Unknown illness, but the deceased showed at least one symptom of beriberi disease
Fisher 5	LU QING YUAN YU 623	October 2019 – September 2021	Unknown illness, but the deceased showed at least one symptom of beriberi disease
Fisher 6	LU RONG YUAN YU 305	September 2019 – September 2020*	Unknown illness, but the deceased showed at least one symptom of beriberi disease
Fisher 7	FU YUAN YU 8783	September 2024 – June 2025	Jumping overboard and went missing (suicide)

[67] The distinctions for slow and active deaths follows Stringer and Yea (2025) in their article, which discusses the plausibility of death and disposability of Indonesian migrant fishers on major East Asian fishing fleets. Stringer, C., Yea, S. Death and disposability of Indonesian migrant fishers at sea. *Maritime Studies* 25, 11 (2026). https://doi.org/10.1007/s40152-025-00469-2.

[68] Two cases of death can be classified as death by natural causes: one Chinese crew member allegedly died from a heart attack, while another Chinese captain allegedly passed away from food poisoning.

[69] "Keeping the Lights On: Uncovering the Networks Enabling the Distant Water Squid Fleet," *C4ADS*, accessed April 20, 2026, https://c4ads.org/reports/keeping-the-lights-on/.

Fisher 8	FU YUAN YU 8783	September 2024 – June 2025	Falling overboard and went missing (work accident)

*The interviewee claimed he only worked for a year on the LU RONG YUAN YU 305 before he was transferred to LU RONG YUAN YU 311.

Case studies:

This section provides detailed case studies for three of the most notable vessels identified through EJF investigations. These vessels have been highlighted to illustrate a variety of noncompliance issues, destructive fishing practices (including shark finning, catching of vulnerable megafauna), unregulated tuna and tuna-like species fishing, and human rights violations on board vessels operating within the NWIO.

Each case study also seeks to demonstrate how these practices can go undetected due to a lack of transparency across the fishery, often facilitated by at-sea trans-shipment and a shortage of both human observers and electronic monitoring systems onboard vessels.

LU RONG YUAN YU 902

Vessel name	IMO number/International radio call sign (IRCS)	Gross Tonnage	Flag	Vessel type
LU RONG YUAN YU 902	9896177/BZZX	965		Light seiner

Interviewees reported dates on board the vessel

Fisher A – September 2024 – June 2025 (8 months)

Fisher B – September 2024 – June 2025 (8 months)

Fisher C – September 2024 – June 2025 (8 months)

Suspected destructive fishing practices

All three crew members interviewed by EJF in 2025 said the vessel targeted squid, mackerel, and skipjack tuna while operating in the NWIO. Fishers reported (1) shark finning, and (2) the capture and killing of vulnerable marine megafauna, as demonstrated in the killing of dolphins for consumption and their teeth as souvenirs. All three fishers also shared testimonies of

capturing other vulnerable species (turtles) as bycatch, which were reportedly released back into the sea.

Shark finning: While the vessel was operating, Fisher B reported that sharks sometimes got trapped in the nets. Small ones weighing around 5 kilograms were taken and finned for crew consumption. Fisher C further added that the sharks that were not finned were mostly dead once they were released back to the sea. Possible shark species caught included, among others, whale shark, blue shark, hammerhead shark, and pelagic thresher shark,[70] with the latter allegedly being finned as well. If this vessel was registered with the IOTC, these practices would be in potential violation of IOTC Resolution 25/08, on shark finning at sea and on the catching and retention of thresher sharks.

Fisher A documented the release of a possible whale shark back into the sea. At first, the whale shark was trapped in the nets, and crew members lifted the shark aboard. The whale shark was kept overnight in the vessel's storage for unknown reasons. It was only released back into the ocean once it was dead. He claimed that filming the process was strictly prohibited by the senior crew: "*When lifting [the whale shark] to the hold, filming was not allowed. This [the video] was also taken secretly.*"

Two screenshots from the video described above allegedly taken onboard the vessel appears to show the dead whale shark on deck before it is dumped into the sea (In potential violation of Resolution 25/08). The video timestamp indicates this was taken on the 12th June 2025.

The capture and killing of vulnerable marine megafauna: Fisher A recounted how one time the fishing nets trapped between 5 and 15 dolphins. One of them was taken to be processed and

[70] EJF investigators are equipped with an animal identification sheet which is provided to fishers during interviews. This includes colour photographs of common shark and marine megafauna that may be encountered by DWF fishing vessels.

consumed by the Chinese crew members, while the rest were thrown back into the sea. Some other crew members also took the dolphin's teeth to be made into souvenirs. According to rough estimates, Fisher C said the vessel caught 30 to 35 dolphins as bycatch throughout the eight months he was on board. When they were hauled onto the deck, the dolphins were already dead. Dolphin meat would be cooked once every two or three months for consumption.

"*I only witnessed one dolphin being processed. Only some parts of it were processed. If I am not mistaken, the insides and outer flesh [were taken], only a little. I witnessed it once.*" — Fisher C, interviewed in June 2025.

Crew members of the vessel posing with a dolphin they caught aboard (In potential violation of Resolution 23/06).

Possible trans-shipment: According to Fisher A and C, at-sea trans-shipments of catch typically occurred monthly or sometimes bi-monthly. Both Fisher B and C stated that the last trans-shipment was made in May 2025 to a Chinese-flagged reefer vessel.

Details of HR/labour abuses allegations

At least **10** potential FL indicators were reported by interviewees: (1) physical abuse, (2) threats and intimidation, (3) excessive overtime, (4) abusive living and working conditions, (5) abuse of vulnerability, (6) isolation, (7) debt bondage, (8) withholding of wages/unpaid salaries, (9) work with substandard wages, (10) retention of identity documents, and (11) deception. A case of a crew's death is also discussed in a separate section below.

Physical abuse: Although Fisher C did not experience any physical abuse on board, he once witnessed a fellow Indonesian crewmate being choked by a Chinese crew member. Fisher C claimed that the inability of the Indonesian crew to understand the Chinese language was the reason for the physical abuse on board.

Threats and intimidation: According to Fisher C, when the vessel caught too many fish, the crew members—both the Chinese and Indonesian—were instructed to unload those that had been kept in the hold and put them in sacks. However, the crew refused, as the catches from the hold had already begun to rot. Five Indonesian crew members protested against this order, because they were too exhausted to do the work and because the rotten smell of the fish was unbearable, said Fisher C.

The five crew members were threatened and punished by not being given food. In a phone conversation with their agency, the five crew asked to be sent home, but the agency refused. Additionally, they were threatened with a US$1,000 fine to cover their own flight tickets.

Excessive overtime: Fisher A claimed they could get around 6 hours of rest a day, whereas Fisher B said it could be as low as 2 or 3 hours. Working hours could reach up to 16 hours a day with work lasting until sunrise.

Poor-quality food, water, and medicine: Fisher A described the food and drink products they received on board as mostly expired. Food supplies were not adequate to feed everyone on board, and the crew "would scramble for food" during meal times. Fisher C, for instance, admitted that he would often run out of food. In addition, the medicine provided on board was often past its expiration date. Due to these abusive living conditions, Fisher B claimed he was "traumatised" from working on the vessel.

Hazardous working conditions and lack of safety procedures: At least two accidents were linked to the poor safety equipment provided for crew members on board. Fisher C claimed he was hit by a squid twice, resulting in a bruised leg. After the incidents, he was scolded and still forced to work by the senior crew members, despite his insistence that he did not want to.

Abuse of vulnerability: Fisher C emphasised how the language barrier had put enormous pressure on the Indonesian crew and often led to misunderstandings while working with their Chinese counterparts.

Isolation: As the abuses on the vessel became increasingly difficult to endure, the Indonesian crew attempted to lodge complaints with their manning agencies. The agencies, however, dismissed the complaints and told them to work more seriously. Fishers did not receive access to WIFI to communicate with their families at home. Fisher A and C specifically stated that WIFI access was provided free of charge only to Chinese crew members, while Indonesians were told they had to pay.

Debt bondage, withholding of wages, and work with substandard wages: All three fishers were paid a substandard monthly wage of only US$330/month for eight months. Out of this, US$50 was paid as cash to cover onboard necessities such as packaged food and drinks. As the three of them were recruited by the same manning agency, they claimed that their agency deducted their salaries to pay off their debts, ranging from ≈US$1,010 to ≈US$1,150.[71] This mainly covered the costs of administering their pre-departure documents. Fisher A and B also confirmed that the agency facilitated a bank loan to cover such costs, as corroborated by a document shared by Fisher B, which prompted the deductions to be significantly high.

Fisher B and C told EJF that their remaining one-month salary was still held by the agency at the time of their interviews (June 2025). Fisher C added that he had not been paid or given the details of his remaining on-board salary by the agency.

Retention of identity documents: During their recruitment process, the manning agency retained many of the fishers' personal documents, including their ID cards, birth certificates, diplomas, family registration cards, and police clearance certificates. They would only be returned after the fishers finished their contracts, although Fisher C claimed the agency still held his documents at the time of the interview (June 2025).

[71] "Indonesian rupiah to US dollars Historical Exchange Rates," *Wise*, accessed April 14, 2026, https://wise.com/gb/currency-converter/idr-to-usd-rate/history/30-06-2025.

Deception: Fisher C told EJF that his manning agency originally promised him a year's work, as per the contract. In reality, however, the work only lasted for eight months.

Crew death

The three fishers told EJF that their captain allegedly died from food poisoning after consuming pufferfish. Fisher B claimed the captain showed symptoms of difficulty breathing, while Fisher C stated that the captain looked pale and behaved differently for two or three days before his death. After his passing, the captain's body was dressed and placed in the vessel's freezer before it was transferred to a reefer vessel.

FU YUAN YU 8586

Vessel name	IMO number/International radio call sign (IRCS)	Gross Tonnage	Flag	Vessel type
FU YUAN YU 8586	9920198/BZ2UU	1,094		Light seiner

Interviewees' reported dates on board the vessel

Fisher D (From the Philippines) – September 2022 – June 2023 (9 months)

Fisher E (From Indonesia) – September 2024 – June 2025 (9 months)

Fisher F (From Indonesia) – September 2024 – June 2025 (9 months)

Fisher G (From Indonesia) – September 2024 – June 2025 (9 months)

Suspected destructive fishing practices

During their time on board, the fishers reported witnessing several alleged destructive fishing abuses, including (1) shark finning and (2) the deliberate killing of vulnerable marine megafauna. Crew members also reported capturing turtles as bycatch, which were released back into the sea.

Shark finning: According to the interviewees, sharks were frequently caught by the vessel. Fisher E and Fisher F reported that when sharks were caught by their vessel, the fins would be taken, while the bodies would be thrown overboard:

"Sometimes, their fins were taken [...] Their fins were cut off. [...] After that, their bodies were thrown away." — Fisher E, interviewed in June 2025.

Fisher F further elaborated that shark fins were collected and would be taken to land. Fisher E, F, and G also reported that, aside from taking shark fins, crew members would take the bones/spine and, at times, their tails, which would be turned into necklaces, bracelets, or

other accessories. Furthermore, Fisher E, F, and G reported that the vessel caught thresher sharks.[72]

Fisher D suspected that the sharks caught by the vessel were sold, as they were transferred to reefer vessels during at-sea trans-shipments.

(Left) A photo of a thresher shark's tail, shared and confirmed by Fisher G (A potential violation of Resolution 25/08). The timestamp indicates the photo was taken on January 29, 2025. (Below) A photo of a fisher posing with a captured shark.

Deliberate killing of vulnerable marine megafauna: All four fishers reported that the vessel caught dolphins as a bycatch during their time on board. Fisher E, F, and G claimed that when dolphins were caught in the nets, the captain would order the crew to lift them aboard and kill them before throwing the bodies back into the sea.

"When we were on the vessel, we often caught dolphins, you know. They went inside our nets, and before throwing them away, their stomachs had to be cut open." — Fisher G, interviewed in March 2026.

"For dolphins, after they were caught, their stomachs were immediately cut open, and they would be thrown back into the sea." — Fisher E, interviewed in June 2025.

Fisher E reported that such practice was commonplace, especially during the squid season, to ensure that the dolphins were really dead. Fisher G explained that if dolphins were released while still alive, they would chase away squid and mackerel tuna from the vessel. He recalled that they usually caught at least two dolphins a day.

Fisher G claimed that the same butchering practice was done to manta rays caught by the vessel as well:

"They [manta rays] were thrown back [into the sea]. We cut open their stomachs, and we threw them away." — Fisher G, interviewed in March 2026.

[72] EJF investigators are equipped with an animal identification sheet which is provided to fishers during interviews. This includes colour photographs of common shark and marine megafauna that may be encountered by DWF fishing vessels.

A photo shared with EJF shows what appears to be a manta ray on the vessel's deck (A potential violation of Resolution 19/03).

Possible trans-shipment: According to all fishers, the vessel conducted at-sea trans-shipments to Chinese-flagged reefer(s). Based on the recollection of Fisher E and F, around 8,000 to 10,000 sacks of mackerel, tuna, and squid were transferred during each trans-shipment. Fisher E estimated that one sack of squid weighed around 20 kilograms, while one sack of mackerel tuna weighed around 17.5 kilograms.

Fisher E said the vessel made a transfer of catch every time it had a full catch, which was usually once a month. At times, trans-shipment could be done every week, depending on the captain's request.

Details of HR/labour abuses allegations *Warning: contains graphic accounts of sexual violence*

At least **11** potential FL indicators were reported by interviewees: (1) physical and sexual violence, (2) intimidation and threats, (3) excessive overtime, (4) restriction of movement, (5) isolation, (6) abusive living and working conditions, (7) work with substandard wages, (8) debt bondage, (9) withholding of wages, (10) deception, and (11) document retention.

Physical and sexual violence: Fisher E, F, and G reported physical abuse happening on board the vessel. According to Fisher E, a Burmese crew member was beaten when he accidentally bumped into a Chinese crew member during work:

"Without any warning, he [the Burmese crew member] was immediately beaten up, choked, and kicked. He was kicked from the work area all the way down to the fish hold[...] He was beaten up, and he was also chased." — Fisher E, interviewed in June 2025.

According to Fisher G, the Indonesian crew also experienced physical violence:

"Indonesian crew members also experienced it [physical violence]. When we were working, sorting the fish, if we were slow, we would be kicked." — Fisher G, interviewed in March 2026.

According to Fisher E and F, sexual violence also happened on board, where a Chinese crew member attempted to rape one of their Indonesian crewmates. Based on their accounts, during a drinking session, Fisher X (not interviewed by EJF) was pulled by a Chinese crew member to his room, where he was about to be forcefully undressed and raped. Fisher X reportedly pushed the perpetrator away and ran off.

Threats and Intimidation: Fisher E, F, and G reported receiving threats and intimidation, especially from their senior crew members, during their time on board. Where Fisher F was threatened with not receiving his bonus, Fisher E claimed he was once forced to work despite a hand injury.

"I was tasked to work in the top freezer, and my hand got injured. So, my hand, which was once fractured, started hurting again. However, I was still told to work. They said if I do not work, I would not be paid." — Fisher E, interviewed in June 2025.

Excessive overtime: All four fishers reported that the working hours on board were excessively long. Fisher E, for instance, reported that crew members sometimes slept for only 2 hours a day, and that the longest rest could be only 6 hours. Fisher D described how excessive overtime was often caused by the large volume of catches and the extra work of sorting and organising them, making them work day and night. According to Fisher D, work normally started at 8pm in the evening and lasted between 10 and 12 hours, depending on the season. After a short break for sleep and meals, this was followed by the task of moving their frozen catches to a different storage.

Restriction of movement and isolation: All four fishers testified that the vessel did not dock during their nine months on board. They could not access WIFI to communicate with their families. According to Fisher D, WIFI was available, but he would have to pay the captain a fee of around US$14 to use it. Fisher G added by claiming that WIFI access was reserved only for the Chinese crew.

Abusive living and working conditions: All fishers reported abusive living and working conditions during their time on board, as evidenced by the poor quality of food and water, as well as a lack of safety and work equipment.

Fisher D and G reported that the food on board had expired, while Fisher F claimed that the bottled water had expired as well. Fisher E explained that one month after the vessel set sail, the crew had run out of their rationed bottled water and would have to pay for more. Otherwise, they had to rely on drinking distilled water. Fisher F also reported that the food provided was not suitable for most of the Muslims on board, since it always contained pork:

"As a Muslim, the food [on the vessel] was mixed with pork. There was always pork in the food." — Fisher F, interviewed in June 2025.

Fisher G also claimed that the safety and working equipment on board was inadequate, as demonstrated by a lack of lifejackets and empty fire extinguishers.

Work with substandard wages, debt bondage, and withholding of wages: Fisher E, F, and G had already incurred a significant amount of debt before boarding the vessel. Fisher D, on the other hand, reported that throughout his time on board, his family did not receive his salary, and that his manning agency paid him only upon his return to the Philippines.

As the three Indonesian fishers were recruited by the same manning agency, they reported that the agency facilitated a bank loan scheme that funded their pre-departure costs. To pay off their debts, Fisher E was subjected to an IDR 17,250,000 (≈US$1,008) salary deduction, while Fisher G was subjected to an IDR 17,850,000 (≈US$1,043) salary deduction. A document shared with EJF by Fisher F also revealed that his salary was deducted by IDR 17,945,000 (≈US$1,048) to cover administration and document processing fees, bank interest, and bank administration fees. Compared with their monthly salaries of only US$330, these salary deductions imposed a severe burden on the fishers.

Deception: Fishers E, F, and G reported that the duration of their contract was supposed to be for two years, but they only worked for around eight to nine months on board. Fisher G also claimed he was given only 15 minutes to read his contract before signing, which made him feel rushed.

Document retention: Fishers E, F, and G reported that their personal documents were retained by their Indonesian manning agency during their time on board. In addition, as a result of the bank loan scheme facilitated by the agency, Fisher E reported that he did not have access to the bank account or ATM card, and similarly, Fisher F claimed that his passbook was kept by the agency.

FU YUAN YU 8572

Vessel name	IMO number/International radio call sign (IRCS)	Gross Tonnage	Flag	Vessel type
FU YUAN YU 8572	8556457/BZU8O	697		Light seiner

Interviewees reported dates on board the vessel

Fisher H (From Indonesia) – September 2022 – June 2023 and September 2023 – May 2024 (17 months in total)

Suspected destructive fishing practices

Fisher H spent two separate working periods on board, totalling 17 months. Fisher H witnessed, and at times participated in, several alleged destructive fishing practices during his time on board, including: (1) shark finning, (2) the capture and deliberate killing of vulnerable marine megafauna, and (3) suspected fishing in unauthorised grounds. According to Fisher H, sea turtles were sometimes caught unintentionally and released immediately.

Shark finning: Fisher H reported that intentional shark capture, as evident in the use of dolphins' blood as shark bait, and finning happened onboard. According to Fisher H, there were approximately five sharks in every haul, and crew members would take the fins, flesh, and bones of the sharks for different purposes. For instance, Fisher H reported that the meat would be cooked for onboard consumption by the Chinese crew, while some might be stored as commodities to be sold in China.

Fisher H added that only big sharks were captured, while small sharks were usually released back into the sea. During his first trip from September 2022 until June 2023, Fisher H reported catching more smaller sharks than the bigger ones he found during his second trip. The most commonly processed species was blue shark.[73]

Fisher H reported that during his first working period, the Chinese captain was aware of the shark finning practice initiated by the Chinese crew, as he stated, "*It was the Chinese crew's initiative. Because they wanted to take the bones. [...] Yes, he [the captain] knew.*"

Crew members dissect a shark on board the vessel. The picture is timestamped in the early morning of April 22, 2024.

The capture and deliberate killing of vulnerable marine megafauna: Fisher H reported that dolphins were captured and killed on board. Dead dolphins had their stomachs cut open and were immediately discarded as bait to attract sharks due to the strong smell of their blood.

[73] EJF investigators are equipped with an animal identification sheet which is provided to fishers during interviews. This includes colour photographs of common shark and marine megafauna that may be encountered by DWF fishing vessels.

"*Yes, it [dolphin] was killed. It would later be used to attract sharks. The blood*." — Fisher H, interviewed in June 2024.

"*I caught sharks. I caught dolphins, and it was taken onto the vessel. But it was released after the stomach got cut open.*" — Fisher H, interviewed in June 2024.

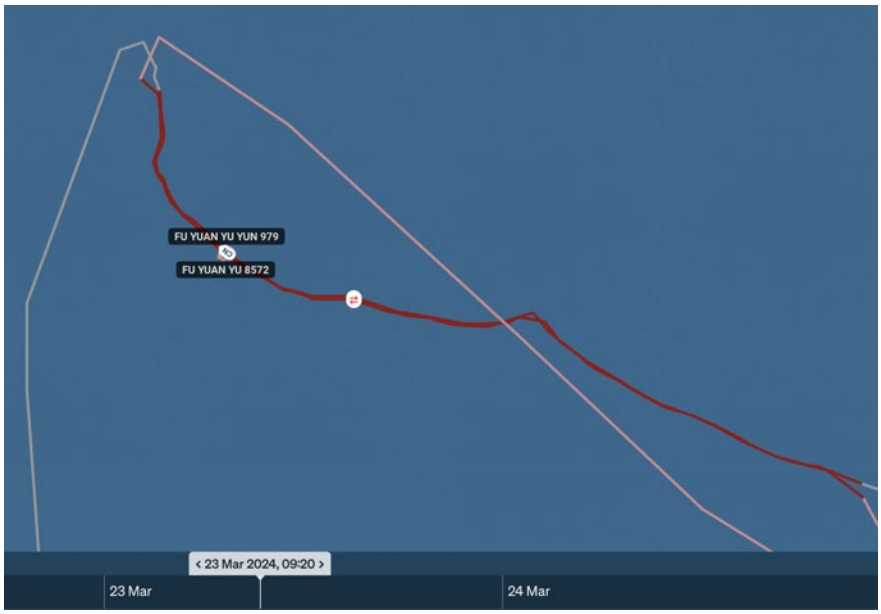
Suspected fishing without a license: Fisher H reported an incident in which the vessel was allegedly operating in unauthorised waters. He alleged that the vessel conducted an illegal fishing operation where the vessel fished with its lights off and all the crew were rushed. Fisher H also stated that the vessel almost got detained.

"The vessel nearly entered a border. But the vessel immediately made a turn. The vessel was empty at that time. [...] There was no catch when we were in the Arabian sea. So, we tried to fish at the border."— Fisher H, interviewed in June 2024.

Possible trans-shipment: Fisher H reported that the vessel trans-shipped its catch to Chinese-flagged reefers and never unloaded at port. Reefers included the WAN TONG and the FU YUAN YU LENG 222 in April 2024. Additional reefers have been identified through photos/videos obtained by EJF.

"*Sometimes the vessel was full after two weeks. When there were lots of fish, the catch would be transferred every two weeks. When there was less fish, it usually took a month or more.*" — Fisher H, interviewed in June 2024.

A photo taken from the Fu Yuan Yu 8572 shows the Fu Yuan Yu Yun 979 (IMO: 8786478) alongside. The timestamp shows the time and date as the 23rd March 2024. GPS coordinate metadata (16 deg 59' 13.22" N, 64 deg 3' 6.89" E) from the photo places it directly on the AIS track for the Fu Yuan Yu 8572 during this trans-shipment.

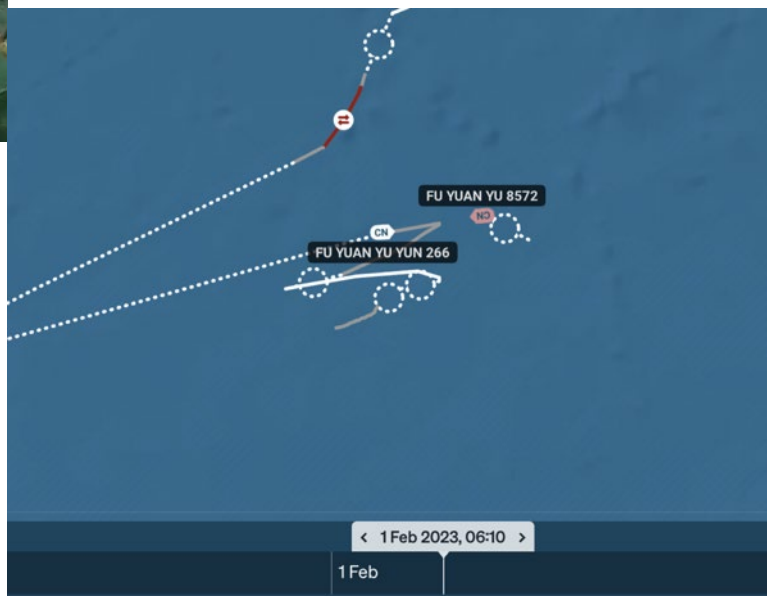


EJF has corroborated this trans-shipment via Starboard showing that this took place within the NWIO. Starboard indicates that the 'encounter' took place between 1:54 - 12:21 (UTC) on the 23rd March 2024 (10 hours 27 minutes) with the screenshot above showing 9:20 (UTC). Although the timestamp of the photo indicates that the photo was taken at 13:22, this discrepancy could be explained by the phone's clock being set to the region's time zone (UTC+4) which would be 9:22 (UTC) and still within the reported encounter timeframe.

Neither the Fu Yuan Yu 8572 nor the Fu Yuan Yu Yun 979 is found on either the active or historical list of IOTC authorised vessels.[74] Under IOTC Resolution 19/04 concerning the establishment of an IOTC record of vessels authorised to operate in the IOTC area, "vessels not entered into the record are deemed not to be authorised to fish for, retain on board, tranship or land tuna and tuna-like species." IOTC Resolution 25/05 on establishing a programme for trans-shipment by large-scale fishing vessels, "carrier vessels not entered on the Record are deemed not to be authorised to receive tuna and tuna-like species and sharks."

[74] IOTC (2026) IOTC Record of Authorised Vessels and IOTC Record of Carrier Vessels, https://iotc.org/vessels

EJF has obtained footage from the 1st February 2023 of the Fu Yuan Yu 8572 allegedly trans-shipping with the Fu Yuan Yu Yun 266 (IMO: 9926764) - A reefer also not found on the IOTC record. Starboard AIS records (see below) indicate that the vessels were in proximity to one another on the 1st February 2023. However, due to gaps in the Fu Yuan Yu 8572's AIS track, Starboard is not able to identify a possible encounter between the two vessels. It should be noted that the Fu Yuan Yu Yun 266 loiters (Speeds between 0.6 - 1.3 knots) from 9:10 - 22:20, indicating a possible trans-shipment took place.



(Above) A screen grab from a video shared with EJF shows the reefer vessel - FU YUAN YU YUN 266 (Callsign: BZU9Z), allegedly receiving catch from the FU YUAN YU 8572. The video was timestamped to the 1st February 2023.

EJF also has a photo allegedly taken on the 19th December 2022 showing the Fu Yuan Yu 8572 trans-shipping with a reefer (See Appendix 4). AIS tracks from that day place the Fu Yuan Yu 67 (IMO: 8581971) in the vicinity. However, due to very sporadic AIS signals from the Fu Yuan Yu 8572, Starboard was not able to detect an encounter between the two vessels.

Details of HR/labour abuses allegations

EJF interviews with the crew member in 2023 and 2024 have revealed a litany of human rights abuses on board the vessel. At least **seven** potential FL indicators were reported: (1) physical

abuse, (2) excessive overtime, (3) abusive living and working conditions, (4) isolation, (5) debt bondage, (6) withholding of wages/unpaid salaries, and (7) work with substandard or no wages.

Physical abuse: Although he claimed that the Indonesian crew members were never physically or verbally abused on board, Fisher H reported that due to their lack of work experience and inability to understand the Chinese language, his Filipino crewmates were often abused by the senior crew. He shared an instance of physical abuse, allegedly experienced by a Filipino fisher during his first trip.

"*For the hitting, it happened to crew members from the Philippines. The Filipinos were inexperienced. They didn't understand the language. The Chinese crew became uncontrolled. He frequently ordered things. I only saw the captain throw a sponge. But the sponge was quite hard. I have no idea whether it hurts or not.*"— Fisher H, interviewed in June 2023.

Excessive overtime: Fisher H reckoned that during his first trip, when there were lots of catches, he could rest for only 2 to 3 hours, suggesting that the working hours could reach approximately 21 hours. However, he claimed he would usually get 8 hours of rest during normal seasons.

Abusive working and living conditions: Fisher H testified that the food provided on board was of poor quality or already expired. He would have to purchase this using his US$50 on-board allowance.

"*This year, it was not really fit to be consumed. I think the snacks were from last year's trip. The snacks from 2023 were still there.*" — Fisher H, interviewed in June 2024.

"*The water was distilled. Fortunately, the water was clean. All of the food expired. Not only the noodles but also the biscuits.*" — Fisher H, as interviewed in June 2023.

Additionally, Fisher H and his Indonesian crewmates, who were recruited by another manning agency, were required to pay for working clothes and shoes on board. Fisher H claimed that this was evident on his crewmates' payslips, where the purchases were listed as loans.

Isolation: Despite WIFI being available onboard, only Chinese crew members were granted access. Fisher H stated that he sometimes would borrow Chinese crew members' phones to communicate with his family.

Debt bondage, withholding of wages, and work with substandard or no wages: During his second trip on board, Fisher H's agreed salary was US$500. For the first three months, Fisher H only received US$200, due to deductions for his documents fee, guarantee money, and on-board salary. For his security deposit, he claimed that the agency deducted a total of US$800 from his salary during each of his contract periods.

Fisher H's agreed salary during his first trip was US$450. Out of his total salary, he reported that the manning agency deducted US$1,000 for his pre-departure administration costs without providing any clear details on the deduction.

Fisher H reportedly never received his remaining on-board salary from his first trip. The captain told him that he would receive his on-board salary upon return to Indonesia. However, once he asked the manning agency for his salary, they told him he should have requested it while he was still aboard. By the time of his interview in 2023, Fisher H was still waiting for his US$600 remaining on-board salary and US$800 of security deposit. He was asked to wait for another three months for the total amount to be paid.

During his second working period, Fisher H claimed he received his on-board salary, although no detailed calculation of the funds transferred was ever provided.

Recommendations:

This briefing sets out a series of allegations of destructive/unethical fishing and unregulated (potentially illegal and unreported too) tuna fishing practices. Many of these allegations are a direct consequence of the unregulated nature of the NWIO squid fishery, governance gaps in the Indian Ocean RFMO landscape, and a chronic lack of transparency in China's light seiner fishing operations. This fishery scored consistently higher rates of both fisheries and labour abuse when compared to similar EJF investigations from Chinese-flagged fleets in the Southwest Atlantic and South Pacific.

To address these factors, improve fisheries governance and help end human rights abuses at sea, EJF recommends that all governments fully support, adopt and implement the provisions of the Global Charter for Fisheries Transparency[75] and advance each of its 10 principles in a time-bound and proven manner. EJF further urges stakeholders and specific governments to implement the following actions:

China: EJF recommends that China (as the principal flag state) should:

Immediate investigation and enforcement:

- Investigate the allegations of destructive/unethical fishing practices, unregulated tuna fishing, and labour abuse detailed in this briefing. This should include detailed analysis of vessel logbooks, monitoring systems data, interviews with vessel captains, and interviews with crewmembers (following a strict victim-centred approach) to verify the allegations.
- Where infractions, as per Chinese fisheries, wildlife protection and labour regulations, are identified, take swift action to punish offenders and strip vessels of fishing licenses.
- Publicly disclose the results of these investigations to all relevant stakeholders including the IOTC, relevant governments, and the IORA.
- Cooperate fully with any procedure initiated by IOTC Contracting Parties or Cooperating Non-Contracting Parties to list the vessels implicated in this briefing on the IOTC's IUU List.[76]

Policy and fisheries governance reform:

- Improve transparency and accountability of DWF squid fishing activities, including endorsing and implementing the Global Charter for Fisheries Transparency, with specific attention given to mandating at-sea monitoring and inspections of fishing

[75] Coalition for Global Fisheries Transparency (2024), 'Global Charter for Fisheries Transparency', https://fisheriestransparency.net/wp-content/uploads/2024/10/Coalition-for-Fisheries-Transparency-Global-Charter-2024-EN.pdf
[76] IOTC (April 2025) IOTC IUU LIST, https://iotc.org/iotc-iuu-list

vessels, eliminating at-sea trans-shipment of squid unless pre-authorised and closely monitored by human observers and/or remote electronic monitoring (REM).
- Regularly publish and update a full vessel license list for vessels operating in the NWIO squid fishery, providing full details for vessel identifiers (including IMO numbers), ultimate beneficial ownership, gear type, target species, and fishing area.
- Publish species-disaggregated catch data from all Chinese-flagged fishing vessels operating in the NWIO from 2021 onwards, including total catch by species (squid and all tuna bycatch separately), fishing effort (vessel days), and geographic location of fishing activity. This data should be reported to the IOTC and SIOFA Secretariats and be made publicly available. China should pledge to continue publishing this reporting on an ongoing annual basis. This is vital for the scientific community to understand the fishing capacity of this relatively new vessel type.
- Impose a moratorium on light seine fishing given the method's disproportionate and indiscriminate impact on marine ecosystems. This moratorium should remain in place until measures are introduced which can effectively mitigate these impacts.
- Where legislative gaps prevent alleged offenders of fisheries abuses from being punished, reform relevant legislation to ensure that commonly occurring fisheries abuses, such as shark finning at sea, the disposal of shark bodies, and the capture of marine mammals and other vulnerable megafauna, are outlawed and carry sufficient financial and/or punitive penalties to deter such harmful practices.

Southern Indian Ocean Fisheries Agreement: EJF recommends that the SIOFA should:

- Initiate a formal and expedited process to amend the Agreement's AOC to include the high seas waters of the NWIO which currently fall outside both the SIOFA and IOTC's effective management jurisdiction.
- Adopt data reporting requirements for squid fisheries that include mandatory reporting (including retroactive) of all catch (target and bycatch) including sharks, turtles, cetaceans and seabirds. Given the SIOFA Secretariat's March 2026 decision to include tuna and billfish in its catch reporting (SC-11-INFO-14[77]), these reporting requirements should encompass any tuna and tuna-like species taken as bycatch in squid fisheries.
- Ensure vessels targeting squid are enrolled in an Observer Scheme (or equivalent electronic monitoring requirements).
- Impose a moratorium on light seine fishing given the method's disproportionate and indiscriminate impacts on marine ecosystems. This moratorium should remain in place until measures are introduced which can effectively mitigate these impacts.
- Call on all CPCs to endorse and implement the Global Charter for Fisheries Transparency and to apply its principles across all fisheries within the SIOFA Convention Area, with particular urgency in relation to squid and other non-tuna high seas fisheries.
- Commission joint stock assessments for purpleback squid in the NWIO, noting that no baseline stock assessment currently exists for this species in the region.
- Set fishing effort and fleet capacity management measures on the purpleback squid fishery, ensuring a strictly precautionary approach is deployed.

[77] SIOFA (March 2026) Inclusion of tuna and billfish in SIOFA catch reporting, https://siofa.org/meeting-file/meeting-documents/11th_annual_meeting_of_the_siofa_scientific_committee_sc11/SC-11-INFO-14-%5BABSTRACT%5D-SIOFA-Past-Reports-IOTC-Species-Exclusion_restricted.pdf

- Establish a formal cooperation mechanism between the SIOFA and the IOTC for the management of multi-species fisheries operating across mandate boundaries.

Indian Ocean Tuna Commission: EJF recommends that the IOTC should:

- Investigate the allegations of destructive/unethical fishing practices and unregulated tuna fishing detailed in this briefing and, where appropriate, consider the listing of implicated vessels on the IOTC's IUU List.
- Adopt a Resolution recognising that non-tuna fisheries operating in its AOC interact with IOTC-managed species and should be subject to minimum data reporting requirements (Regardless of their declared target species or whether actors are bound by the IOTC agreement), consistent with the IOTC's obligations under the UN Fish Stocks Agreement and the FAO Code of Conduct for Responsible Fisheries. This should be conducted in close cooperation with the SIOFA.
- Request the Scientific Committee to assess the trophic dependency of IOTC-managed tuna stocks on squid species, particularly purpleback squid (*Sthenoteuthis oualaniensis*), as a basis for incorporating ecosystem considerations into tuna management plans.
- Adopt a resolution calling on all CPCs to implement, within their domestic legal frameworks, the transparency measures set out in the Global Charter for Fisheries Transparency — in particular those relating to vessel information (unique vessel identification, published authorisation lists) and fishing activity (mandatory AIS/VMS carriage and public transmission, observer coverage, and catch reporting) — as applied to all vessels operating in the IOTC Convention Area, including those targeting non-tuna species.

Coastal states that border the NWIO: EJF recommends that coastal states that border the NWIO should:

- Endorse and implement the Global Charter for Fisheries Transparency as a means of improving regional monitoring, control and surveillance capabilities designed to tackle IUU fishing, destructive fishing practices, and their underlying enabling factors.
- Initiate the IOTC IUU listing process for vessels implicated in this briefing and ensure that concerned coastal states coordinate their submissions to maximise evidentiary weight.
- Establish a formal NWIO coastal states coordination mechanism — modelled on the South Pacific fisheries coalition of Chile, Ecuador, Peru, Colombia, and Argentina — to advance multilateral solutions to unregulated squid fishing and its widespread consequences for Indian Ocean marine ecosystems and fisher livelihoods. This mechanism should pursue joint diplomatic positions at IOTC, SIOFA and other relevant forums, develop shared vessel-monitoring and surveillance infrastructure, and adopt coordinated port-state measures. The IORA Guidelines provide a framework for such cooperation, with Paragraphs 18–19 encouraging cross-border enforcement cooperation and facilitation of hot pursuit, and Paragraph 11 encouraging states to provide mutual assistance in implementation."
- Adopt coordinated port state measures requiring all squid vessels to carry operational VMS (to be shared with all concerned NWIO coastal states) and/or mandate AIS transmissions, and to report catches as a condition of accessing

regional ports for resupply, crew changes, and trans-shipment — following the precedent set by Peru in 2024.[78]

Indian Ocean Rim Association: EJF recommends that the Indian Ocean Rim Association (IORA) and member countries in accordance with the IORA's principle guidelines on combating illegal, unreported and unregulated (IUU) fishing[79]:

- Disseminate the findings of this briefing to all IORA members and take action to ensure that implicated vessels are either classified as high-risk vessels subject to thorough port-side inspection or are denied entry if they request port access.
- Apply the provisions of its own guidelines on combating IUU fishing to the NWIO squid fleet as a priority test case. Specific provisions to prioritise would include No. 36 (Vessel identifier and IMO number compliance), No. 38 (Accurate reporting and monitoring of at-sea trans-shipment), No. 18-19 (Cross-border enforcement cooperation and facilitation of hot pursuit), and No. 44 (Information sharing when denying port access).
- Request the IORA Core Group on Fisheries Management to address the omission of squid fisheries from the guidelines at the next review, given the impacts of unregulated squid fishing and the widespread consequences on IORA countries from an environmental, social and economic perspective. This should take the form of supplementary guidance specifically addressing high-seas squid fishing, including light seining gear.
- Endorse the Global Charter for Fisheries Transparency at the next review of the guidelines.
- Encourage IORA member countries to review, endorse and implement the Global Charter's principles.

Appendix

Appendix 1: Methodology:

As part of its investigations, EJF conducted interviews with 60 Indonesian and 46 Filipino fishers. These fishers worked onboard 64 Chinese-flagged light seiner vessels operating in the NWIO between 2020 and 2025. EJF routinely conducts open-ended semi-structured interviews with crew who have worked on board industrial fishing vessels to collate evidence of potential illegal, unreported and unregulated (IUU) fishing and forced labour. Questions cover all aspects of the fishers' employment including their recruitment process, fishing operations, living and working conditions onboard, and repatriation process. All crew were asked for their informed consent before interviews took place.

Wherever possible, EJF has attempted to corroborate testimonies with additional evidence, such as additional interviewees from the same vessel, photo or video evidence of IUU fishing infractions, their contracts, travel documents, and payslips.

[78] Rojas Vásquez, P., Gozzer-Wuest, R., Gomez-Oré, I., & Miranda Eyzaguirre, A. (2025). Ártículo doctrinal: "Monitoreo satelital de embarcaciones calamareras de aguas distantes que usan puertos peruanos: desafíos para la implementación del Decreto Supremo nº 014-2024-PRODUCE"". Actualidad Jurídica Ambiental, n. 158. DOI: https://doi.org/10.56398/ajacieda.00426

[79] IORA (May 2025) Indian Ocean Rim Association Principle Guidelines on Combating Illegal, unreported and unregulated (IUU) fishing, https://www.iora.int/sites/default/files/2026-03/IORA%20Principle%20Guidelines%20on%20Combating%20IUU%20Fishing.pdf

EJF utilises both GFW and Starboard Maritime Intelligence[80] to verify vessel AIS transmissions. This is used to corroborate crew testimonies even further. EJF also uses these platforms to identify potential vessel encounters whilst at sea.

Social media investigations, including searches for photos, videos, or other materials related to the vessels, were also undertaken. For vessels where social media analysis has been conducted, raw videos and photos are available upon request. Links for videos have not been included in this report to protect the identity of the fishers who uploaded these materials.

Fishing effort data were extracted and analysed across FAO Fishing Area subregions 51.3 and 51.4[81], with a southern boundary set at 10°N to minimise interference from other gear types, particularly longliners. Fishing effort was estimated using GFW analysis tools applied to available AIS data. GFW's vessel classification algorithms do not yet distinguish light seiners as a dedicated gear type; as a result, most light seiner vessels are labelled as 'fishing vessels', 'inconclusive', or 'squid jiggers' within the GFW dataset. As light seiners are, to EJF's knowledge, operated exclusively by Chinese-flagged vessels, Chinese flag state was applied as an additional filter for vessel nationality. These parameters were defined prior to conducting a zonal analysis of fishing vessels and fishing effort within the study area.

Between 2020 and 2025, 240 unique MMSIs were broadcast by light seiners within the NWIO study area. At least eight MMSIs were shared between multiple vessels — likely due to changes in ownership without corresponding identifier updates — meaning the true number of unique vessels is estimated at between 223 and 231. EJF interviewed fishers from 64 light seiners, representing almost 28% of vessels active in the region over the study period.

[80] Starboard (2026) Starboard Maritime Intelligence, https://www.starboardintelligence.com/
[81] FAO (2026) Indian Ocean, Western (Major Fishing Area 51), https://www.fao.org/fishery/en/area/fao:51/en

Appendix 2: IOTC Resolutions:

The alleged destructive fishing practices uncovered on light seiners operating in the NWIO are unlikely to be in violation of IOTC Resolutions. However, if these light seiner vessels were registered with the IOTC, EJF has identified the following relevant Resolutions that these vessels would be in violation of:

IOTC Resolution 12/04 on the conservation of marine turtles: *"(9(a)) Ensure that operators of such vessels, while fishing in the IOTC area: i. To the extent practicable, avoid encirclement of marine turtles, and if a marine turtle is encircled or entangled, take practicable measures to safely release the turtle in accordance with the handling guidelines in the IOTC Marine Turtle Identification Cards; ii. To the extent practicable, release all marine turtles observed entangled in fish aggregating devices (FADs) or other fishing gear; iii. If a marine turtle is entangled in the net, stop net roll as soon as the turtle comes out of the water; disentangle the turtle without injuring it before resuming the net roll; and to the extent practicable, assist the recovery of the turtle before returning it to the water; iv. Carry and employ dip nets, when appropriate, to handle marine turtles."*[82]

IOTC Resolution 25/08 on conservation of sharks caught in association with fisheries managed by IOTC: "*CPCs shall ensure that their flag vessels do not retain on board, transship, land and store any part or whole carcass of the following sharks: a) oceanic whitetip sharks; b) thresher sharks; and c) whale sharks.*"[83]

"(3) Subject to paragraph 4, CPCs shall ensure that their flag vessels do not retain on board, transship, land and store any part or whole carcass of the following sharks: a) oceanic whitetip sharks; b) thresher sharks; and c) whale sharks."

"(7) Without prejudice to paragraphs 5 and 6, in order to facilitate on-board storage, shark fins may be partially sliced through and folded against the shark carcass as specified in the diagram in Annex II, but shall not be removed from the carcass until the first point of landing."

"(8) In order to implement the obligation in paragraph 5 for sharks landed frozen in 2026, 2027 and 2028, CPCs shall ensure their fleets land or tranship sharks with fins naturally attached to the carcass."

IOTC Resolution 16/07 on the use of artificial lights to attract fish: "*Fishing vessels and other vessels including support, supply and auxiliary vessels flying the flag of an IOTC Contracting Party or Cooperating Non-Contracting Party (collectively CPCs) are prohibited from using, installing or operating surface or submerged artificial lights for the purpose of aggregating tuna and tuna-like species beyond territorial waters. The use of lights on DFADs is also already prohibited."*[84]

"*CPCs shall prohibit their flagged vessels from intentionally conducting fishing activities around or near any vessel or DFAD equipped with artificial lights for the purpose of attracting tuna and tuna-like species under the mandate of the IOTC and in the IOTC area of competence.*"

[82] IOTC (2012) Resolution 12/04 on the conservation of marine turtles, https://iotc.org/sites/default/files/documents/compliance/cmm/iotc_cmm_12-04_en.pdf
[83] IOTC (2025) Resolution 25/08 on the conservation of sharks caught in association with fisheries managed by IOTC, https://iotc.org/sites/default/files/documents/compliance/cmm/iotc_cmm_2508_0.pdf
[84] IOTC (2016) Resolution 16/07 on the use of artificial lights to attract fish, https://iotc.org/sites/default/files/documents/compliance/cmm/iotc_cmm_16-07_en.pdf

IOTC Resolution 19/03 on the conservation of mobulid rays caught in association with fisheries in the IOTC area of competence: *"(2) CPCs shall prohibit all vessels from intentionally setting any gear type for targeted fishing of mobulid rays in the IOTC Area of Competence, if the animal is sighted prior to commencement of the set. (3) CPCs shall prohibit all vessels retaining onboard, transhipping, landing, storing, any part or whole carcass of mobulid rays caught in the IOTC Area of Competence."*[85]

IOTC Resolution 23/06 on catching and retaining of cetaceans (false killer whales and dolphins): "*CPCs shall prohibit their flagged vessels from intentionally setting a purse seine net around a cetacean in the IOTC area of competence. CPCs shall require that, in the event that a cetacean is unintentionally encircled in a purse seine net, or captured or entangled in the gillnets the master of the vessels shall: a) take all reasonable steps to ensure the safe release of the cetacean… CPCs using other gear types fishing for tuna and tuna-like species associated with cetaceans shall report all interactions with cetaceans to the relevant authority of the flag State and include all the information outlined in paragraph 3b(i–vi)."*[86]

Appendix 3: News article published by the Fuzhou Customs District of the PRC detailing the unloading of 671 tonnes of frozen squid and frozen skipjack tuna from a number of light seiner vessels. EJF interviewed one former fisher from the Fu Yuan Yu 8896 in 2024.[87]

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Pingtan Customs' "full-chain escort" facilitates efficient customs clearance for distant-water fish catches

Published: 2025-06-10 14:38 Source: Fuzhou Customs [Font Size: Large Medium Small] Share to:

On June 9, the ocean-going fishing vessels "Fuyuanyu 8896", "Fuyuanyu 8897", "Fuyuanyu 8898", and "Fuyuanyu 8899" successively berthed at the Jinjing Wharf in Pingtan. Customs officers from Pingtan Customs, under the jurisdiction of Fuzhou Customs, immediately boarded the vessels for inspection. After passing sanitary treatment, 671 tons of frozen squid, frozen skipjack tuna, and other catches began to be unloaded. This was the first time this year that Pingtan Customs had supervised the entry of ocean-going self-caught fishing vessels.

"In the past, when docking at other ports, the queues for entry and exit took a long time. Now, at Pingtan Jinjing Port, the customs has opened a green channel for us, which has greatly reduced the unloading time. Our freshly unloaded catch, still covered in frost, can be transferred to nearby seafood warehouses and processing plants by refrigerated trucks, achieving a rapid connection from the 'deck' to the 'processing station'," said Lin Cheng, manager of Zhongmingzhou (Fujian) Fisheries Co., Ltd.

It is understood that the fishing vessel that entered the country this time went to the high seas of the Indian Ocean last September to carry out fishing operations and returned to port today. Due to the long voyage, the vessel's certificate of exemption from sanitary control measures has expired, but the fishing vessel urgently needs to enter the country to unload its cargo and undergo repairs in order to ensure that it can set sail again for fishing operations. The person in charge of the vessel sought assistance from customs.

[85] IOTC (2019) Resolution 19/03 on the conservation of mobulid rays caught in association with fisheries in the IOTC area of competence, https://iotc.org/sites/default/files/documents/compliance/cmm/iotc_cmm_1903_0.pdf
[86] IOTC (2023) Resolution 23/06 on the conservation of cetaceans, https://iotc.org/sites/default/files/documents/compliance/cmm/iotc_cmm_2306.pdf
[87] Fuzhou Customs (10th June 2025) Pingtan customs facilitates effective customs clearance for distant-water fish catches, http://manzhouli.customs.gov.cn/fuzhou_customs/484123/484124/6564010/index.html

Appendix 4: Alleged trans-shipment between the Fu Yuan Yu 8572 and the Fu Yuan Yu 67 (IMO: 8581971). The photo is timestamped to the 19th December 2022.