



# CRIME ON THE HIGH SEAS:

illegal fishing and its links  
to the illegal trade of wildlife,  
guns and drugs

A report by the Environmental Justice Foundation



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## Abbreviations:

**CITES** - Convention on International Trade in Endangered Species of Wild Fauna and Flora

**CRFV** - Criminal Record of Fishing Vessels

**EEZ** - Exclusive economic zone

**EJF** - Environmental Justice Foundation

**FAO** - Food and Agriculture Organisation of the United Nations

**GI-TOC** - Global Initiative Against Transnational Organized Crime

**IUU** - Illegal, unreported and unregulated (fishing)

**MCS** - Monitoring, control and surveillance (mechanism)

**RFMO** - Regional Fisheries Management Organisation

**UNODC** - United Nations Office on Drugs and Crime

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# Executive summary



*Crew continue fishing and processing shark carcasses amidst harsh weather conditions.*

- The world's oceans are vast and even today truly effective monitoring, control and surveillance (MCS) of at-sea activities remains elusive and expensive. To make matters more complicated, the number of vessels operating around the world is huge, with an estimated 4.1 million fishing vessels in 2020 alone.<sup>1</sup> Fisheries represent a significant source of employment as well as food production, globally directly employing an estimated 58.5 million people and supporting about 600 million livelihoods.<sup>2</sup>
- There is growing evidence from research projects and case studies across the world, as well as from EJF's own investigations, that the practice of at-sea trans-shipment facilitates and is linked to either or both IUU fishing and human rights abuses against fishers.<sup>3/4</sup> This is due to the practice allowing vessels to operate at sea for longer periods of time and therefore be subjected to fewer checks, inspections and scrutiny.<sup>5</sup>
- Commercial fishing vessels may operate for months or even years at a time with a lack of scrutiny and monitoring of high seas fishing and trans-shipment activities providing the ideal conditions for IUU fishing and linked crimes to go undetected. These linked crimes might include forced labour, human rights abuses, human trafficking, money laundering, tax evasion, and document fraud.<sup>6</sup> It can also allow for other associated or indirect crimes such as drug, weapon and wildlife trafficking to occur.<sup>7</sup> Such practices during trans-shipments at-sea have been documented in the Indian Ocean<sup>8</sup>, in the Atlantic off West Africa<sup>9/10</sup>, in the Western Pacific<sup>11</sup>, and in waters around Southeast Asia.<sup>12</sup>
- This report forms part of EJF's ongoing research into the practices of IUU fishing, human rights abuses at sea and their connection to a lack of transparency in global fisheries. *The Weakest Link: How at-sea trans-shipment fuels illegal fishing*

and human rights abuses in global fisheries (2022) report<sup>13</sup> established the linkages between these crimes and the practice of at-sea trans-shipment. This report details additional findings from new investigations across Indonesia, as well as case studies from around the world to illustrate how a lack of transparency in fisheries, as well as practices such as at-sea trans-shipment, can facilitate or be linked to illicit transfers at sea including wildlife trafficking, drugs smuggling and weapons smuggling.

• **Wildlife trafficking:**

44% of vessels engaging in at-sea trans-shipments covered by interviewee testimonies recorded catching charismatic megafauna, compared to 28% of vessels not engaging in at-sea trans-shipment.<sup>14</sup> Vessels engaging in at-sea trans-shipments can use these opportunities to transfer illicit wildlife and wildlife products between vessels and refrigerated cargo vessels or containers.

• **Drug smuggling:**

The value of illicit drugs trafficked via fishing vessels has risen to be worth 15% of the total retail value of global narcotics.<sup>15</sup> A rising global demand for illicit drugs may explain why there has been an increase in drug trafficking by sea and via fishing vessels. In Indonesia it has been reported that 90% of narcotics trafficking is conducted by sea.<sup>16</sup> Research into fishing vessel drug seizures between 2010 and 2017 suggests that the use of fishing vessels in drug trafficking has tripled.<sup>17</sup>

• **Weapons smuggling:**

Reports from around the world show that small fishing vessels can be used to transfer weapons. For example, vessels have been found transport arms into coastal areas in Columbia, where they would either drop the weapons into the sea in plastic bags or engage in at-sea transfers of the weapons onto waiting local vessels.<sup>18</sup> As with wildlife trafficking, smugglers may use industrial or fishing ports to conduct transfers between vessels or to containers.

• EJF recommends a number of solutions that are designed to address the key data deficiencies and capacity gaps that facilitate these illegal activities. Many of these solutions revolve around the concept of transparency in global fisheries and the increased international implementation of critical principles for fisheries transparency. These principles can elevate monitoring capabilities, validate and verify key vessel data points such as identity, ownership and history, as well as increase the effectiveness of law enforcement operations in identifying potential illegal operators.



*A lack of transparency at sea can allow endangered species such as hammerhead and shortfin mako sharks (pictured) to be caught and processed.*

# Introduction

There is growing evidence from research projects and case studies across the world as well as from EJF's own investigations, that the practice of at-sea trans-shipment facilitates and is linked to either or both IUU fishing and human rights abuses against fishers.<sup>19/20</sup> This is due to the practice allowing vessels to operate at sea for longer periods of time and therefore be subjected to fewer checks, inspections and scrutiny.<sup>21</sup> EJF interviews with 96 Indonesian fishermen in 2021 who worked on distant water fishing (DWF) vessels found that vessels within the sample dataset which had reportedly engaged in at-sea trans-shipment spent on average 13.3 months at sea, while for vessels that did not trans-ship, the average trip length was just three months.<sup>22</sup>

A lack of scrutiny and monitoring of high seas trans-shipments provides ideal conditions for IUU fishing and linked crimes such as forced labour, human rights abuses, human trafficking, money laundering, tax evasion, and document fraud to thrive onboard fishing vessels engaged in such illicit activities.<sup>23</sup> It can also allow for other associated or indirect crimes such as drug, weapon and wildlife trafficking to occur.<sup>24</sup> Such practices during trans-shipments at-sea have been documented in the Indian Ocean<sup>25</sup>, in the Atlantic off West Africa<sup>26/27</sup>, in the Western Pacific<sup>28</sup>, and in waters around Southeast Asia.<sup>29</sup>

Human observer coverage of both fishing and carrier vessels – an integral component for MCS – has suffered in recent years due to the COVID-19 pandemic.<sup>30</sup> Of 13 global regional fisheries management organisations (RFMOs) surveyed by the Organisation for Economic Co-operation and Development, 9 responded saying that human observers were either suspended or their deployment reduced during the pandemic, potentially increasing the opportunity for IUU fishing and other crimes to go undetected during at-sea trans-shipments. Even in one of the most heavily monitored and scrutinised tuna fisheries in the world – the jurisdiction of the Western & Central Pacific Fisheries Commission (WCPFC)<sup>31</sup> – human observer rates dropped dramatically with only 12% of trans-shipments observed in 2021.<sup>32</sup>

Increasingly, smaller, more nimble small-scale fishing vessels are being used to transport illicit goods out to sea to then transfer these to waiting larger fishing vessels.<sup>33</sup> The use of these smaller craft facilitates more discrete operations, is less suspicious, and allows for a wider distribution of illegal shipments across multiple vessels. This helps to diversify risk to the traffickers in case one or two of the shipments are discovered.





*Small, numerous, nimble vessels can circumvent regulations and monitoring mechanisms such as human observers or vessel monitoring technologies, making them attractive options for involvement in smuggling activities.*

## What are associated crimes?

This report focuses on the associated crimes of wildlife trafficking, drugs and weapons smuggling that may occur separately or alongside IUU fishing, human or labour abuses within the global fishing industry. It also assesses whether these crimes are exacerbated or enabled by a lack of transparency at sea as well as the practice of at-sea trans-shipment. These associated crimes were chosen due to their global reach and extensive traded value.

In terms of the relative size of the illegal trade across these three criminal sectors, the smuggling of narcotics far outweighs both wildlife and weapons traffic combined. Global illegal trade in narcotics is estimated to total around \$400-650 billion per year, whereas the illegal wildlife trade is estimated to be worth \$5-23 billion and illegal weapons trafficking is worth between \$1.7-3.5 billion (Other sources put the total value for wildlife crime between \$8-10 billion<sup>34</sup>).<sup>35</sup> Drug trafficking represents one-third of the total retail value of all transnational crime, valued at \$1.6-2.2 trillion per year.<sup>36</sup> In comparison, IUU fishing is valued at \$15.5-36.4 billion per year, representing 1.7% of total transnational crime retail value according to an analysis by Global Financial Integrity.<sup>37</sup>

## Why are fishing vessels involved in associated crimes?

Fishing vessels have been, and are increasingly utilised by smugglers of illicit cargo for several reasons.<sup>38</sup> The ubiquitous nature of fishing vessels across all geographies makes them less likely to raise suspicions, and this is especially the case for artisanal fishing vessels. Such vessels are far smaller and more numerous than their commercial fishing counterparts and may not justify inspections by law enforcement agencies due to a perception that they are less likely to engage in illegal acts.<sup>39</sup>

Analysis of the Criminal Record of Fishing Vessels (CRFV) from 2000 to 2020 found 6,853 incidents of illegal activities as well as 7,962 associated offences involving fishing vessels or companies. For the purposes of their research, the authors classified offences as either “fishing offences”, “fraud and diversion offences” or “other personal and property offences”. The most common offences recorded in the analysis were fishing without a licence (48% of all offences), other fishing offences (31%), human rights abuses (11%), smuggling of drugs, arms and other goods and products (4%) and unauthorised trans-shipment (3%).<sup>40</sup>

Small fishing vessels provide an additional advantage for smugglers, in that they are nimble and manoeuvrable enough to evade detection.<sup>41</sup> In many fisheries, smaller vessels are not required to be fitted with any form of vessel monitoring system nor are they likely to carry human observers or cameras designed to monitor onboard activities.



*Fishing vessel holds can provide ample storage for illicit contraband.*

The construction of fishing vessels also makes them advantageous for trafficking activities. Fishing vessels and their holds can be retrofitted easily and cheaply to carry large amounts of products other than seafood. For example, a Taiwanese fishing vessel was only discovered to have over one tonne of ketamine onboard after it lost power and had to be towed back to port by a Coast Guard Administration patrol boat. Upon inspection, the drugs were discovered hidden underneath one of the freezers.<sup>42</sup>

Fishing vessels are also used to travelling long distances and staying at sea for prolonged periods of time. Their captains or owners are often expert navigators and have in-depth knowledge of coastal waters, making them invaluable to smugglers looking to find secluded locations for at-sea trans-shipments or to evade detection from the authorities.

Depleted fish populations around the world already drive IUU fishing and subsequent labour abuses onboard fishing vessels.<sup>43</sup> Additional challenges such as the COVID-19 pandemic and rising fuel costs due to the war in Ukraine may lead desperate fishing vessel operators to engage in associated smuggling crimes as a way of supplementing their dwindling incomes.<sup>44/45</sup>

The economics of becoming involved in the smuggling of contraband may also persuade fishers to engage in such illegal acts. In Costa Rica for example, fishers may only make around \$300 per month from fishing compared to \$25,000 if they work for the drug traffickers.<sup>46</sup>

# Why conduct transfers so far out at sea?



*Tuna is transferred from a longline fishing vessel to a waiting carrier vessel.*

At-sea trans-shipments often take place hundreds of kilometres from shore and predominantly on the high seas, as their primary purpose is to alleviate transit times to and from fishing grounds as well as to reduce fuel costs. These areas tend to be outside of national borders and may only be governed by RFMOs with limited regulatory capacity to identify or sanction perpetrators of these complex and sophisticated crimes. This can mean that transfers are conducted without oversight and with little chance of enforcement agencies encountering the transfer in progress.<sup>47</sup> Although human observer rates are increasing for carrier vessels the same cannot be said for fishing vessels.<sup>48</sup> COVID-19 also aggravated this situation further, reducing the number of deployed human observers around the world.<sup>49</sup>

The remoteness, logistics and costs of conducting at-sea or airborne patrols in such ocean areas also allows IUU fishing and associated crimes to go undetected.<sup>50/51</sup> These patrols may also be limited in their mandate and ability to detect illegal activities. Minimising the frequency of inspections and chances of undesirable scrutiny of vessel operations is of course an attractive option for unscrupulous vessel owners.

A FAO report detailing findings from 13 RFMOs around the world found that the vast majority of 4,647 recorded trans-shipment events between fishing vessels and carrier vessels (98%) in 2017 took place on the high seas. These high-seas trans-shipments were responsible for the transfer of 688,876 tonnes (73%) of seafood product out of a total 947,066 tonnes trans-shipped that year.<sup>52</sup>

# EJF investigation methodology and results

## Methodology

From April 2021 to February 2022, EJF's Indonesia-based investigators conducted interviews with 96 Indonesian crew members who worked across 79 different vessels including tuna longliners, squid jiggers and trawlers. 40 (51%) of these vessels were Chinese-flagged, 27 (34%) were Taiwanese-flagged, and the rest (12 vessels) were flagged to Vanuatu, Oman, Côte d'Ivoire, Federated States of Micronesia, Kenya, Fiji, and Mozambique (see figure 4 below).<sup>53</sup> EJF has found that some of these vessels are potentially beneficially owned by individuals based in China, Taiwan or other flag States according to relevant RFMO records. For full details of EJF's methodology and how interviewees were selected please refer to the Weakest Link (2022) report.<sup>54</sup>

Of the 79 fishing vessels identified, 61 vessels (77.22%) were longliners, 17 vessels (21.52%) were squid jiggers, and 1 vessel (1.27%) was a trawler. Crew testimonies and available photographs or video evidence recorded that 54 of these vessels (68.35%) had engaged in potential at-sea trans-shipment activities during the crewmember's time on board (Trans-shipment fishing vessels are known as TF vessels).

Vessel activities based on fishers' testimonies	Total number of fishing vessels	%
Trans-shipment fishing vessels (TF)	54	68.35%
Non-trans-shipment fishing vessels (NTF)	25	31.65%

Table 1. Breakdown of fishing vessels in EJF's sample set by whether they engaged in potential trans-shipment (TF vessels or not (NTF vessels).

Crew testimonies from all vessels were matched with available fishing vessel tracking records from Spire ShipView and Global Fishing Watch's Carrier Vessel Portal to corroborate potential encounters between vessels.<sup>55/56</sup> This was important to verify crews' claims that their vessels did or did not engage in trans-shipment. Several of the crews' fishing vessels did not broadcast Automatic Identification System (AIS) data during their time on board, meaning that such analysis was sometimes unavailable.



EJF investigators provide an animal identification sheet to all interviewees to help them identify different shark and charismatic megafauna that they might have encountered during their time onboard.



A crew member poses with a number of dolphins caught by the fishing vessel.

## Wildlife trafficking

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***“We caught dolphins very often. We cut the neck and took the head... we took the jaw only for accessories. The captain usually did that... The dolphins ate the bait, we did not actually mean to catch them.”<sup>57</sup>***

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For the purposes of this report, wildlife trafficking is defined as the ‘taking, trading (supplying, selling or trafficking), importing, exporting, processing, possessing, obtaining and consumption of wild fauna and flora... in contravention of national or international law’. This definition extends to include the ‘processing of wildlife into products, their transportation, offer for sale, sale, or possession.’<sup>58</sup>

**In the decade between 2007 and 2017 the number of wildlife seizures increased by 147% from 8,423 seizures to 20,762.<sup>59</sup>**

Accurately measuring general trends in wildlife trafficking, as with other contraband trafficking can be notoriously difficult. Best estimates put the total value of wildlife crime at between \$5–23 billion per year.<sup>60/61</sup> According to the UNODC’s World WISE Database, which records seizure data from 149 countries and territories on an annual basis, the number of seizures increased by 147% between 2007 and 2017.<sup>62</sup> Although the initial COVID-19 lockdowns seemed to stem global wildlife trade for a period, researchers (at least from Southeast Asia) have indicated that post-pandemic wildlife smuggling may return to previous levels. This suggestion emerged as many traders switched to either stockpiling animal parts and/or advertising these online.<sup>63</sup>

EJF’s own investigations and interviews with 96 Indonesian fishermen who worked on a range of different types of vessels found several cases where fishers had observed or been ordered to bring protected marine species onboard.<sup>64</sup> In many cases these animals were caught incidentally but were killed and processed for their valuable body parts such as teeth and tusks. These products would then enter the black market either through at-sea trans-shipments between the fishing vessel and carrier vessels or other fishing vessels or through direct landings at port.<sup>65</sup>



*The global trade and demand for protected wildlife products drives illegal shark finning as well as the killing of protected marine wildlife.*

## Charismatic megafauna

44% of vessels engaging in at-sea trans-shipments covered by interviewee testimonies recorded catching charismatic megafauna compared to 28% of vessels not engaging in at-sea trans-shipment.

*Crew described how the captain ordered them to bring the whale onboard. They took the teeth from the whale as souvenirs.*

Fishers have told EJV how they would be ordered to catch and process charismatic species (also known as marine megafauna<sup>66</sup>) such as dolphins, seals, false killer whales and turtles to extract products to be kept as souvenirs or to be sold on the black market. A higher proportion of vessels engaging in at-sea trans-shipment (TF vessels) reported the capture and processing of charismatic species and potential trafficking of wildlife products compared to vessels that did not engage in at-sea trans-shipment (NTF vessels).

In the case of cetacean captures, the captain and/or senior crew would order the crew members to kill them, decapitate the animal, take their teeth, and throw the bodies back into the sea. Sometimes, the captain and/or senior crew would share a few of the teeth with the crew.

***“We caught two false killer whales ... Their teeth were collected and their bodies were discarded ... The captain, bosun, and other senior crew took the teeth.”<sup>67</sup>***

Many crew members reported that false killer whale and dolphin teeth were kept as souvenirs, often to be made into jewellery. Some mentioned that the teeth were sold on to black market buyers. False killer whale teeth especially can hold enormous value with a carved and polished specimen worth up to USD\$ 200.

***“Once we caught a turtle and the captain took the shell... It was an olive ridley sea turtle.”<sup>68</sup>***

Conduct	TF Total (n=54)	%	NTF Total (n=25)	%
Collection/possession of dolphin body parts	3	5.56%	0	0%
Collection/possession of false killer whale body parts	12	22.22%	6	24%
Collection/possession of seal/walrus body parts	8	14.81%	0	0%
Collection/possession of turtle body parts	1	1.85%	1	4%
<b>Total</b>	<b>24</b>	<b>44%</b>	<b>7</b>	<b>28%</b>

*Table 2: Activities related to charismatic species catches on vessels engaged in at-sea trans-shipment (TF) and vessels reportedly not engaged in at-sea trans-shipment (NTF) based on interviews with fishers.<sup>69</sup>*



*An alleged false killer whale tooth hangs from a chain around this interviewee’s neck.*

Table 2 demonstrates that vessels engaged in at-sea trans-shipment were more likely to catch and retain charismatic megafauna. In addition, several crew members reported that seals/walrus were intentionally harpooned on their vessel(s). The captain would instruct the crew members to capture the seals/walrus, kill them, and take their body parts. Parts of the seal/walrus' body, such as the teeth, skin/fur, whisker, and/or genitalia, were collected for various purposes. For example, seal/walrus teeth were collected to be made into accessories whilst the seal/walrus blood would be consumed for medicinal purposes.

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***“Seals were harpooned... The captain instructed (the crew members) to harpoon the teeth, he said he needed the teeth for a necklace... In two years, we got approximately 10 seals.”***<sup>70</sup>

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A crew member also mentioned that the skin would be taken to be used as material for a jacket, while the other body parts were also utilised:

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***“During the two years (on board), the vessel caught hundreds of seals... the bodies were thrown away, the teeth and skin were collected by the captain ... They said the skins would be used for jackets... the teeth would be used as pendants for necklaces.”***<sup>71</sup>

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According to crew members from vessels not engaging in at-sea trans-shipment (NTF vessels), vessels would catch dolphins to use their meat as bait to attract sharks. However, the dolphin meat was not sold to other vessels. Dolphin body parts, such as teeth, were not collected either. As such, NTF vessels appear to have a lower rate of collection of dolphin body parts.

The low prevalence of seal and walrus body parts collection might also be associated with the type of fishing gear. Seals/walrus tend to be captured by squid jiggers. However, of EJF's NTF vessel sample, there were no squid jiggers recorded, resulting in a low rate of seal and walrus captures.

*A fur seal is brought onboard a fishing vessel and killed.*



# Shark finning and capture of protected shark species



A bundle of shark fins ready to be transferred.



A crew member sits with freshly cut shark fins.

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***“We transferred to the collecting vessel every three to four months... The fish were unloaded first, the fins were last...During the transfer, nobody supervised us.”<sup>72</sup>***

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Finning of protected shark species was widely reported amongst fisher interviews. EJF used a shark identification guide<sup>i</sup> to help interviewees identify a range of protected shark species including thresher sharks<sup>73</sup>, hammerhead sharks<sup>74</sup>, oceanic whitetip sharks<sup>75</sup>, and shortfin mako sharks.<sup>76</sup> These species are protected under numerous RFMOs and under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Appendices which seek to restrict or limit the global trade in vulnerable or protected wildlife species.<sup>77</sup>

Crew described how for these species, they would cut off the fins and then dump the bodies back into the sea. Often this was done to disguise the fact that they had caught a protected species.

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***“Thresher shark fins were taken, while the body was discarded... [Once the fins had been sliced] they were stored in a freezer, cleaned, and sun-dried... They were put in a box, that way the police would not find them. The fins [which were put in a box] were put under a layer of fish.”<sup>78</sup>***

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<sup>i</sup>For full details of EJF’s methodology for identifying shark species through crew interviews please refer to the Weakest Link (2022) report.



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*“We did (catch hammerhead sharks)... We also did (catch shortfin mako sharks)... They were processed the same way – only the fins were removed (but the bodies were thrown overboard)...”<sup>79</sup>*

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*“Yes (mako sharks were caught). We did not (keep the body)... We got (hammerhead sharks)... Only the fins were collected...”<sup>80</sup>*

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*“Yes, we got oceanic whitetip shark(s)... only the fins were collected... the bodies were discarded.”<sup>81</sup>*

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**Based on crew members’ testimonies, of the 54 TF vessels, 31 vessels (or 57.41%) were allegedly involved in shark finning. Rates of shark finning were lower on NTF vessels, with seven vessels (28%) involved in the practice.<sup>82</sup>**

Vessels engaging in at-sea trans-shipments can use these opportunities to transfer illicit wildlife and wildlife products between vessels and refrigerated cargo vessels or containers.<sup>83</sup> Illegally traded shark fins from protected species, for example, are often smuggled illegally through portside or at-sea trans-shipment. Recent arrests in Peru are just one example of how shark fins from protected species can be smuggled via this method, with little to no chance of authorities scrutinising them.<sup>84</sup>

Across both vessel groups, crew members reported that they were told to hide the shark fins by putting them in sacks and then layering piles of catch, bait, or the crew’s food supply on top. These fins were hidden to avoid being discovered during any potential inspection. Crew also described how the vessel captain might order them to begin discarding bodies once the freezer was full.

## Illegal wildlife trade in Indonesia.

Indonesia is one of the biggest biodiversity hotspots in the world.<sup>85</sup> It is home to roughly 11% of the world's flowering plants, 13% of its mammals, 6% of its amphibians, 7% of its reptiles, 16% of its birds and 14% of its fish.<sup>86</sup> Many of these species are protected by law catch because they are threatened or because their unique habitats have come under threat from human activities such as deforestation, unsustainable agriculture and plantation expansion, forest fires, water and air pollution, and poaching. Most of these protected species are exotic and endemic, being found on only specific islands within Indonesia.<sup>87</sup> This rarity has spurred a lucrative black-market trade of these species.<sup>88</sup> Some of the most trafficked species from Indonesia<sup>89</sup> include pangolins<sup>90</sup>, Javanese leopard<sup>91</sup>, hornbills<sup>92</sup>, the Sumatran tiger<sup>93</sup>, primate species<sup>94/95</sup> and many species of songbirds.<sup>96/97/98</sup>

In recent years Papua and West Papua provinces have become some of the main sources of these illegally traded animals for both domestic and international black markets.<sup>99/100/101/102</sup> The region is largely still forested in dense, primary rainforest trees and human influence has until recently been minimal. There are at least three national parks holding the highest status as class 1 national parks with a total area of more than four million hectares.<sup>103/104</sup>

Indonesia is an archipelagic country, and Papua is a key source for illegally traded species, as much of the illicit smuggling is done via sea. For example, in October 2017 the Indonesian Navy managed to thwart the smuggling of more than 100 pangolins to Malaysia aboard a fishing boat and two suspects were arrested.<sup>105</sup>

In September 2018, more than 400 animals were rescued by the Royal Malaysian Custom Department, when perpetrators tried to smuggle wildlife from Sumatra, Indonesia to Thailand through The Strait of Malacca. The wildlife rescued included a pair of orangutans, various species of crocodiles, birds and marsupials.<sup>106</sup> Another example is the smuggling case of 11 taxidermied birds of paradise, a king cockatoo, four yellow-crested cockatoos, four citron-crested cockatoos, three salmon-crested cockatoos and a golden monkey. The police described how many of the animals were taken from Papua by boat to Probolinggo, East Java in 2019.<sup>107</sup> From there, the birds were smuggled via land transport until they were discovered in Jambi province, Sumatra.



*Shark fins dry in the sun in North Sulawesi.*

# Drug smuggling

According to the UNODC, drug smuggling or trafficking can be described as the “global illicit trade involving the cultivation, manufacture, distribution and sale of substances which are subject to drug prohibition laws.”<sup>108</sup> The value of illicit drugs trafficked via fishing vessels has risen to be worth 15% of the total retail value of global narcotics.<sup>109</sup> A rising global demand for illicit drugs may explain why there has been an increase in drug trafficking by sea and via fishing vessels.<sup>110/111</sup> In Indonesia it has been reported that 90% of narcotics trafficking is conducted by sea.<sup>112</sup>

Reports of fishing vessel involvement are widespread with cocaine being one of the main drugs being trafficked this way.<sup>113</sup> Several fishing vessels have, for example, recently been apprehended as they attempted to smuggle cocaine into Europe from South America.<sup>114/115</sup>

Researchers hypothesise that increases in the use of fishing vessels in drug trafficking could also be driven by dwindling catches and falling profits in coastal fishing communities. This could be causing vessel operators to engage in the illicit drugs trade as a means of maintaining profitability.<sup>116</sup> Research into fishing vessel drug seizures between 2010 and 2017 suggests that the use of fishing vessels in drug trafficking has tripled.<sup>117</sup>

It is possible that the COVID-19 pandemic and the war in Ukraine may aggravate this situation further as many fishing vessel operators have been forced to moor their vessels up either due to lack of seafood demand, restaurant closures or due to spiking fuel costs.<sup>118/119</sup> The UNODC has documented that the COVID-19 pandemic has accelerated some drug trafficking patterns including “larger shipment sizes” and “increased use of waterway routes”.<sup>120</sup> Struggling fishing boat operators in the Netherlands have reported being approached directly by smugglers, asking them to participate in the pickup, drop-off and at-sea trans-shipment of narcotics.<sup>121</sup> The COVID-19 pandemic also affected human observer rates across fishing vessels and carrier vessels operating in RFMOs, jeopardising MCS efforts.<sup>122</sup>

Drug smuggling cartels may also hijack or steal fishing vessels to repurpose them for trafficking narcotics.<sup>123</sup> In a cruel twist of fate, one report from Mexico suggests that organised crime syndicates may even use the bought or stolen vessels to engage in IUU fishing, further perpetuating the situation and potentially leading to a spiralling cycle of lost catch revenues and further involvement in illegal smuggling activities.<sup>124/125</sup>

## Preference for ‘clean vessels’

Several studies suggest that there is a low level of overlap between the practices of illegal fishing and drug smuggling.<sup>126</sup> According to the research, drug traffickers may be less likely to engage in illegal fishing during smuggling activities and more inclined to use “clean vessels” with no previous criminal history because these vessels are less likely to be inspected than vessels known to have engaged in illegal fishing.

Research of global CRFV incidents between 2000 and 2020 found that 60% of all drug smuggling offences were recorded in the artisanal fishing sector.<sup>127</sup> This analysis also found that vessels involved in drugs and other contraband smuggling were less likely to be involved in other crimes. However, vessels that were involved in human rights or labour abuses were more likely to have committed other types of offence such as IUU fishing, waste dumping, fraud, or unauthorised trans-shipment. This could suggest that such vessels are systematically seeking to reduce costs through engaging in additional criminal practices.<sup>128</sup>

## At-sea transfers facilitate European bound drug supply

A Venezuelan fishing vessel was apprehended in October 2021 with 4.2 tonnes of cocaine onboard. It was believed that it was attempting to rendezvous at a pre-agreed point within the Atlantic Ocean with another vessel coming from Spain.<sup>129</sup> Several other fishing vessels have recently been apprehended as they attempt to smuggle cocaine into Europe. One fishing vessel was arrested off the Canary Islands with 2.9 tonnes of cocaine onboard while a Brazilian flagged fishing vessel was apprehended with 5.67 tonnes of cocaine onboard.<sup>130/131</sup> Both cases occurred in April 2022. This method of transferring shipments of drugs between fishing vessels and mother ships is a growing practice with the general route they take often referred to as the “African route”.<sup>132/133</sup>

## Drug smuggling enabled via at-sea transfer

On the 20th of February 2018, a fishing vessel, the Min Lian Yu Yun 61870, was intercepted by Indonesian police and customs officials. The vessel was found to be loaded with 1.62 tonnes of methamphetamines.<sup>134/135/136</sup> At the time of the arrest, the vessel was flying the flag of China at the back, and the flag of Singapore at the front.<sup>137</sup> The flags of Indonesia and Thailand were also found on the vessel but were not used.<sup>138</sup>

Despite its relatively large size (the vessel's gross tonnage was 300GT), the vessel was only manned by four crew. According to trial witnesses, vessels of that size require around 20 crew to conduct fishing operations.<sup>139</sup> Moreover, during the arrest, it was found that the vessel had not turned its AIS transponder on.<sup>140</sup> The witnesses also stated that although the crew were on a fishing vessel, there was no catch onboard, nor any other evidence that any fishing activity had taken place.<sup>141</sup>

During the trial, the crew members testified that a foreign vessel transferred goods to their vessel while at sea.<sup>142</sup> The goods turned out to be 81 sacks of drugs.<sup>143</sup> This case is an example of how a fishing vessel and the practice of trans-shipment is used as a disguise to transport, carry, or deliver narcotics.<sup>144</sup>

The case was brought before the Batam District Court.<sup>145</sup> The court held that the four crew members were unlawfully acting as middlemen in the sale and purchase of methamphetamine pursuant to Article 114 paragraph (2) in conjunction with Article 132 paragraph (1) of the Law No. 35 of 2009 regarding Narcotics, and as such, they were sentenced to death. This decision was upheld by the high court<sup>146</sup> and the Supreme Court of Indonesia.<sup>147</sup>



*A screenshot taken from a video obtained by EJF shows a crew member throwing potentially smuggled weapons overboard to avoid discovery.*

## Weapons smuggling

The UN defines trafficking of small arms as “the import, export, acquisition, sale, delivery, movement or transfer of firearms, their parts and components and ammunition from or across the territory of one State Party to that of another State Party if any one of the States Parties concerned does not authorize it [...] or if the firearms are not marked in accordance with [...] this Protocol”.<sup>148</sup> The Global Initiative Against Transnational Organized Crime has found arms trafficking to be the third most prevalent criminal market globally after human trafficking and the cannabis trade.<sup>149</sup> Although it does not hold the same traded value as other forms of contraband smuggling detailed in this report, it is a pervasive form of transnational organised crime found in all areas of the globe.<sup>150/151/152</sup> The most affected regions of the world by weapons smuggling include Western Asia, East Africa, Central America and Central Africa.

Fishing vessels have been known to be used to transport or transfer firearms.<sup>153</sup> For example, small fishing vessels have been reported to transport arms to coastal areas in Columbia, where they would either drop the weapons into the sea in plastic bags or engage in at-sea transfers of the weapons onto waiting local vessels.<sup>154</sup> As with wildlife trafficking, smugglers may use industrial or fishing ports to conduct transfers between vessels or to containers.<sup>155</sup>

**The global annual illegal trade in weapons is worth between \$1.7-3.5 billion.** <sup>156/157</sup>

It should be noted that weapons smuggling may often only be a supplementary criminal activity rather than the primary income source.<sup>158</sup> This is due to the high risks involved in such smuggling activities and relatively small markets for distributing the weapons compared to the illegal drugs market. Weapons smugglers may also choose to transport their weapons overland or only via sea for short periods of time to prevent weapon degradation due to the harsh saltwater conditions whilst at sea.<sup>159</sup> In one seizure of over 2,500 guns by the US Navy in 2018, weapons that had been exposed to the ocean elements for over two months were already stained with rust.<sup>160</sup>



*Crew stand with weapons on fishing boat in Somalia.*

# Conclusion

The case studies above illustrate how associated crimes such as wildlife, drug and weapons smuggling are often well organised and take place alongside IUU fishing and human rights abuses. In the absence of transparency and monitoring mechanisms, these crimes can go undetected. At-sea transfers serve as an enabling factor in obscuring these activities further whilst the deployment of a complex network of small, nimble fishing vessels means that they do not arouse suspicion.

The UNODC identifies the lack of at-sea MCS mechanisms for at-sea trans-shipments as one of several critical vulnerabilities of the fishing industry to these associated crimes and transnational organised crime.<sup>147</sup> A lack of transparency in identifying the true beneficial ownership of fishing vessels, the use of flags of convenience (or non-compliance)<sup>162</sup> and a lack of consistent international endorsement or ratification of international labour laws to protect fishing vessel crews are also listed.<sup>163</sup>

In several cases there is evidence to suggest that criminal enterprises specifically target struggling fishers and their operations to influence them to take part in the smuggling of illegal goods, whether it be drugs, weapons or protected wildlife products. Organised crime elements involved in drug smuggling may then use their ill-gotten financial gains to invest in other illegal activities such as IUU fishing.<sup>164</sup>

A lack of international and transboundary cooperation between law enforcement agencies and fisheries management organisations means that monitoring fishing fleets and high seas trans-shipment activities are difficult to coordinate, plan and execute. Law enforcement operations to intercept suspected smuggling vessels in these areas are also difficult and expensive to organise, resulting in low case identification rates on a global scale.

The exploitation of these transparency gaps demonstrates the pressing need for growing international harmonisation of VMS systems through publicly accessible portals such as Global Fishing Watch's Carrier Vessel Portal, as well as a renewed emphasis on other forms of vessel monitoring technology which are already open to the public, such as AIS. Greater efforts need to be made to fit such devices to small-scale fishing vessels to expand global monitoring coverage. Fisheries monitoring agencies should also look to

roll out cameras and other electronic monitoring systems on industrial vessels to ensure that vessels engaging in high seas at-sea trans-shipment can have their activities monitored and verified.

More also needs to be done to protect the livelihoods of artisanal fishers to prevent them from being forced to engage in associated crimes such as drugs, wildlife or weapons smuggling. COVID-19, fuel price spikes, weather patterns or fish migration changes due to climate change and over-fishing have had or will have a drastic impact on the ability of these fishers to feed their families and provide a stable income.

Associated threats such as climate change are likely to exacerbate these conditions, increasing the chances of vessel operators having to sell their vessels or engage in illicit smuggling activities to sustain themselves. A lack of international cooperation in the tracking of fishing vessel ownership means that vast numbers of untraceable fishing vessels could soon be redeployed as illicit goods mules in coastal waters and the high seas.

Ensuring that marine protected areas and small-scale fishing zones such as Inshore Exclusion Zones are adequately protected and expanded wherever possible can help stabilise and strengthen fragile seafood populations. At-sea patrols and community surveillance systems can also help to prevent industrial vessels from intruding into these areas and destroying small-scale fishing gear. Safeguarding the voices of artisanal fishers in national and regional decision-making processes is also vital for protecting environmental and access rights. These measures will in turn make the fishing sector more robust and less prone to falling prey to illegal forms of income generation offered by contraband traffickers.

*The Uthaiwan (Ex. Wisdom Sea Reefer) carrier vessel impounded in Phuket port. The vessel utilised several flags of convenience (or non-compliance) in order to evade enforcement agencies.*



# Recommendations

## International community:

- Encourage national, regional and international adoption and implementation of the Global Charter for Transparency issued by the Coalition for Fisheries Transparency which sets out 10 realistically achievable and cost effective principles for enhancing transparency in global fisheries.
- Improve regional and international information gathering, exchange and verification as it relates to fishing and carrier vessel movements and activities. For example, advocate for the FAO to expand the Global Information Exchange System (GIES) so that human rights issues and indeed other associated crime indicators can be flagged and shared with the next port of call for vessels.<sup>165</sup>
- Improve cooperation between international and national law enforcement agencies in vessel, operator or beneficial ownership information publication and subsequent investigations.
- Rollout and build capacity or training in systematic processes or mechanisms designed to identify, investigate and prosecute associated crimes connected to IUU fishing. For example, providing relevant competent officials with the tools and resources to identify indicators of potential associated crimes during vessel inspections.
- Identify weaknesses in regional frameworks where external experts or organisations could facilitate training, capacity building or system overhauls.
- Adopt an international binding convention that sets out trip limits for fishing vessels, preventing them from being at sea for more than one year at a time.

## Flag states:

- Adopt and implement the Global Charter for Transparency issued by the Coalition for Fisheries Transparency which sets out 10 realistically achievable and cost effective principles for enhancing transparency in global fisheries.
- Review trans-shipment policies already in place for domestic fisheries and distant water fishing fleets with a view to banning at-sea trans-shipments and restricting the practice to those which are fully monitored or are carried out in or near port areas if they are effectively monitored by fisheries inspectors.
- Publicly support and encourage the FAO to continue development and rollout of the Global Record of Fishing Vessels.
- Implement the FAO international guidelines on trans-shipments.
- Install remote sensing technologies on fishing and carrier vessels such as electronic monitoring cameras and sensors on hold doors or fishing gear.

- Impose limits on the maximum number of days at sea without coming back to port for fishing vessels to reduce the reliance on at-sea trans-shipment. Vessels should be limited proportionally based on fishery (coastal or distant water). All fishing vessels should be restricted from operating at sea for more than one year at a time.

- Mandate the installation of vessel monitoring systems such as VMS or AIS on fishing and carrier vessels. Require that all vessels always keep such systems activated while at-sea.

## Coastal states:

- Review trans-shipment policies already in place for national waters with a view to banning at-sea trans-shipments and restricting the practice to those which are fully monitored or are carried out in or near port areas if they are monitored by fisheries inspectors.
- Ratify and implement the FAO's Agreement on Port State Measures (PSMA) to harmonise port State measures in accordance with international standards and to prevent ports of convenience from developing.
- Advocate for the FAO to expand the Global Information Exchange System (GIES) scheme so that human rights issues on vessels can be flagged and shared with the next port of call of vessels.<sup>166</sup> The GIES has recently been launched as a way of assisting PSMA ratifying countries in exchanging information about potential IUU activities. This should also be advocated for at the regional and international level.
- Adopt and implement the Global Charter for Transparency issued by the Coalition for Fisheries Transparency.

- Ensure that artisanal fishers and fishing associations are included in fisheries management decision making processes.

## Market and port states:

- Restrict market access to or demand additional data verification from flag or coastal States that do not take precautions to minimise the risks of fishing or carrier vessels engaged in illegal activities such as IUU fishing, human rights abuses or associated crimes.
- Implement the FAO international guidelines on trans-shipments.
- Ratify and implement the FAO's PSMA to harmonise port state measures in accordance with international standards and to prevent ports of convenience from developing.
- If adequate assurances cannot be provided or investigative mechanisms to verify seafood product legality are lacking, then market access should be either restricted or barred entirely.

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