

Tackling Illegal, Unreported and Unregulated (IUU) Fishing: Strategic Opportunities for the GEF to Safeguard Marine Ecosystems

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Executive Summary

Illegal, unreported, and unregulated (IUU) fishing is one of the most pervasive and complex **threats to the sustainability of marine ecosystems**. It undermines marine biodiversity, weakens ecosystem resilience, erodes food security and livelihoods, and poses broader economic, social, and security risks. Transboundary in nature and often occurring across poorly monitored coastal waters and the high seas, IUU fishing exploits governance gaps, weak enforcement, fragmented regulations, and opaque financial and trade structures. It is increasingly linked to organized crime, human trafficking, forced labor, and other illicit activities.

The **environmental consequences** of IUU fishing are severe. By intensifying already widespread overfishing, IUU fishing accelerates biodiversity loss, disrupts food webs, and degrades ecosystem functioning. It reduces secondary production by removing prey species that support higher trophic levels and can trigger trophic cascades when large predators, such as sharks, tuna, and swordfish are disproportionately targeted. It also contributes to bycatch and discards of juveniles, endangered species, and marine mammals. Climate change compounds these impacts, while IUU fishing itself can exacerbate climate-related ecosystem decline by eroding species' resilience to warming and reducing the ocean's climate-regulating functions, including through impacts on marine carbon cycling.

Globally, an estimated 18% of wild-caught fish is illegal or unreported, amounting to 11–26 million tonnes annually and resulting in **direct economic losses** of more than US\$23 billion annually. Broader economic impacts are far higher when accounting for illicit trade, lost household income, lost tax revenue, and foregone value chain benefits. In some regions, such as West Africa, IUU fishing can account for up to 40% of reported catch, causing severe economic losses, weakening national economies, and undermining the livelihoods and food security of coastal communities.

The **social consequences** are equally profound. IUU fishing threatens nutrition and employment in fisheries-dependent communities, intensifies poverty and inequality, and disproportionately affects women, who make up a large share of the post-harvest fisheries workforce. It is also associated with labor exploitation and unsafe working conditions at sea, with an estimated 128,000 fishers trapped in forced labor globally.

A **broad framework of international and regional instruments** has emerged that requires combatting IUU fishing or provides guidance on how to do so, including the UN Convention on the Law of the Sea (UNCLOS), the UN Fish Stocks Agreement, the Food and Agriculture Organization (FAO) Port State Measures Agreement, the FAO International Plan of Action to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing (IPOA-IUU), the World Trade Organization (WTO) Agreement on Fisheries Subsidies, and the Biodiversity Beyond National Jurisdiction (BBNJ) Agreement. Regional Fisheries Management Organizations (RFMOs)

and the European Union (EU) IUU Regulation, among others, add a regional layer to this comprehensive legal and institutional architecture, while more high-level political commitments from the Group of Seven (G7) and Group of Twenty (G20) further strengthen commitments. At the same time, implementation remains uneven, and IUU operators continue to exploit weak participation, limited enforcement capacity, and fragmented governance systems.

Technological advances, including artificial intelligence, satellite surveillance, electronic monitoring, and electronic catch documentation and traceability systems, are reshaping efforts to detect and deter IUU fishing by improving transparency and real-time monitoring across supply chains and jurisdictions. However, technology alone is insufficient without stronger governance, institutional capacity, and broader participation on the basis of policy-coherent, whole-of-society approaches.

The Global Environment Facility (GEF) has already addressed IUU fishing and is uniquely positioned to further strengthen global action. Through its International Waters (IW) focal area and other programs, the GEF has already supported transboundary fisheries governance, strengthened monitoring, control, and surveillance systems, advanced traceability and market-based compliance tools, and promoted regional cooperation. These efforts have contributed to measurable reductions in IUU incidents in several regions. Yet, given the cross-cutting nature of IUU fishing and its implications for biodiversity, climate resilience, food systems, and sustainable livelihoods, there are opportunities to further integrate IUU considerations across the GEF portfolio.

This note identifies strategic opportunities for the GEF to scale up and strengthen action on IUU fishing by:

- a. Integrating IUU considerations systematically across relevant focal areas and Integrated Programs, ensuring that IUU fishing is addressed in relevant projects focusing on marine ecosystems and the blue economy;
- b. Supporting the improvement of data systems and technology-enabled monitoring for greater transparency along the entire supply chain and through close interactions with relevant partners, including public-private partnerships and consumers;
- c. Strengthening governance, policy coherence, legislation, implementation, and enforcement capacity at different governance levels along the entire supply chain and across governance levels, from local fisheries to global supply chains;
- d. Enhancing regional and global cooperation and support for the implementation of international instruments, including required capacity among countries and regional organizations; and
- e. Broadening stakeholder engagement, including local communities, the private sector, and civil society, enhancing transparency, incentivizing local compliance, and

supporting alternative livelihoods and opportunities through a whole-of-society approach.

By strengthening action on IUU fishing, the GEF can help safeguard marine ecosystems, enhance global environmental benefits, and support more resilient and sustainable ocean economies.

1. Introduction

Illegal, unreported, and unregulated (IUU) fishing¹ is a widespread challenge that affects marine ecosystems, economies, and societies—including threatening food security and livelihoods, as well as posing broader security risks. Its transboundary nature, spanning coastal waters and the high seas, makes it one of the most complex and persistent problems facing ocean governance today.² IUU fishing causes extensive damage to marine species and ecosystems and undermines global environmental benefits (GEBs).

The term “IUU fishing” covers activities conducted in contravention of laws and regulations, non- or misreporting of catches, and unregulated activities in poorly monitored waters or in areas where no applicable conservation or management measures exist (for a more detailed definition of IUU, see Box 1). IUU fishing exploits weak governance systems, undermines national, regional, and global fisheries management efforts, and degrades marine ecosystems by removing large volumes of marine biomass illegally, without regulation or monitoring, distorting the link between management decisions and actual fishing pressure.³ It is also frequently associated with transnational organized crime, as well as human rights abuse, and trafficking.⁴

Box 1: Definition of IUU⁵

The *International Plan of Action to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing (IPOA-IUU)* is a voluntary instrument developed within the framework of the *Code of Conduct for Responsible Fisheries* in response to a call from the Food and Agriculture Organization’s Twenty-third Session of the Committee on Fisheries (COFI). It defines IUU fishing as follows:

Illegal fishing is:

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

1 This brief focuses on IUU fishing in the marine space only. While illegal fishing also occurs in freshwater bodies and is a significant challenge to conservation, the term IUU fishing typically refers to marine fisheries and is therefore only used in this sense in this report.

2 Christensen, J. (2016).

3 Sumaila et al. (2020).

4 Guevarra (2024); Phelps Bondaroff et al., (2015)

5 FAO (2001). International plan of action to prevent, deter and eliminate IUU fishing.

<https://openknowledge.fao.org/server/api/core/bitstreams/a80c3bfb-1d5b-4ee6-9c85-54b7e83986a2/content>

Unreported fishing is:

- misreported or not reported to the relevant national authority, in contravention of national laws and regulations; or
- undertaken in the area of competence of a relevant regional fisheries management organization but has been misreported or not reported, in contravention of the reporting procedures of that organization.

Unregulated fishing is:

- in the area of application of a relevant regional fisheries management organization but is conducted by vessels without nationality, or by those flying the flag of a State not party to that organization, or by a fishing entity in a manner that is not consistent with or contravenes the conservation and management measures of that organization; or
- within areas or targeting fish stocks with 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.

It is estimated that roughly one-fifth (18%) of all wild-caught fish globally is illegal or unreported, with losses between 11 and 26 million tonnes per year, representing US\$10–23.5 billion in economic losses.⁶ This has far-reaching economic consequences for coastal communities where small-scale fisheries are central to employment and food security. It weakens national Gross Domestic Product (GDP) contributions, reduces export revenues, and limits the income-generating opportunities that typically arise from local processing, distribution, and fish market activities.⁷ Economic impacts are most acute in the Eastern Central Atlantic, the region with the highest recorded levels of IUU activity, where an estimated 294,000–562,000 tonnes of fish are taken illegally each year, equivalent to 37–40% of all recorded catch—the highest proportion globally.⁸ Other regions also face high fishing pressure and related economic and environmental losses from IUU activity.

Given these impacts, the Global Environment Facility (GEF) has been working to support sustainable fisheries and, in that context, also to combat IUU fishing. The GEF has progressively strengthened global, regional, and national capacities to address IUU fishing by investing in Regional Fisheries Management Organizations (RFMOs), national institutions, and monitoring systems, while advancing science- and ecosystem-based management and digital traceability technologies that detect and deter illegal activities. Recent projects focus on technology-driven tools such as electronic monitoring and interoperable (eCDT) systems that enhance transparency,

⁶ Agnew et al. (2009).

⁷ Sumaila et al. (2020); Lubchenco & Haugan (2023).

⁸ Agnew et al. (2009).

close enforcement gaps, and support robust, evidence-based monitoring, control, and surveillance systems (MCS) across marine fisheries, especially in Africa, Asia, and South America.⁹ At the same time, opportunities remain to build on these efforts as technology evolves and knowledge on governing IUU challenges advances, especially as the GEF assumes a growing role in financing the sustainable governance of marine ecosystems. This role may become even more significant with the entry into force of the 2023 Agreement under the United Nations Convention on the Law of the Sea on the Conservation and Sustainable Use of Marine Biological Diversity of Areas beyond National Jurisdiction (BBNJ Agreement) and the GEF's important role in its implementation.

This Science and Technical Advisory Panel (STAP) information note outlines strategic entry points across GEF focal areas and Integrated Programs. It provides recommendations to scale up efforts through stronger transboundary cooperation, policy-coherent and cross-sector coordination, whole-of-society approaches, technology-enabled transparency and documentation, support to the implementation of global instruments to prevent, deter, and eliminate IUU fishing, and the strengthening of capacity required for this.

2. The case against IUU fishing

Although IUU fishing is often regarded as a problem driven primarily by large industrial fleets, evidence shows that it occurs across *all* types and scales of fisheries.¹⁰ From industrial distant-water fleets to dispersed small-scale and artisanal fisheries, IUU activities manifest in almost all types of fisheries in varied forms, shaped by local socio-economic and governance conditions.¹¹ IUU fishing remains a low-risk, high-return activity driven by a combination of increasing demand, economic incentives, weak governance, and inadequate monitoring and enforcement capacity. As demand for seafood grows, many actors in the fishing industry try to boost production by increasing fishing effort, which results in short-term gains but inevitably leads to overfishing and provides incentives for IUU fishing activities, as they can generate more catch and thus more economic gains than would otherwise be possible.

Environmental Impacts

Almost all ocean and sea areas are affected by at least one anthropogenic driver, and a significant area (41%) is strongly affected by multiple drivers, including climate-related pressures, commercial fishing, and land-based impacts.¹² Over-exploitation, particularly in the fishing sector, is the largest driver of biodiversity loss in marine ecosystems.¹³ In this context, IUU fishing intensifies already widespread unsustainable fishing, further undermining marine biodiversity,

⁹ For example, GEF IDs 11674, 3558, and 4528.

¹⁰ Temple et al. (2022).

¹¹ Widjaja et al. (2020).

¹² Halpern et al. (2008).

¹³ IPBES (2019); IPBES (2022).

ecosystem functioning, and resilience. Figure 1 shows that several FAO major fishing areas are already characterized by a high proportion of biologically unsustainable stocks, underscoring the persistent overexploitation of marine resources and the need for stronger management and compliance measures.¹⁴

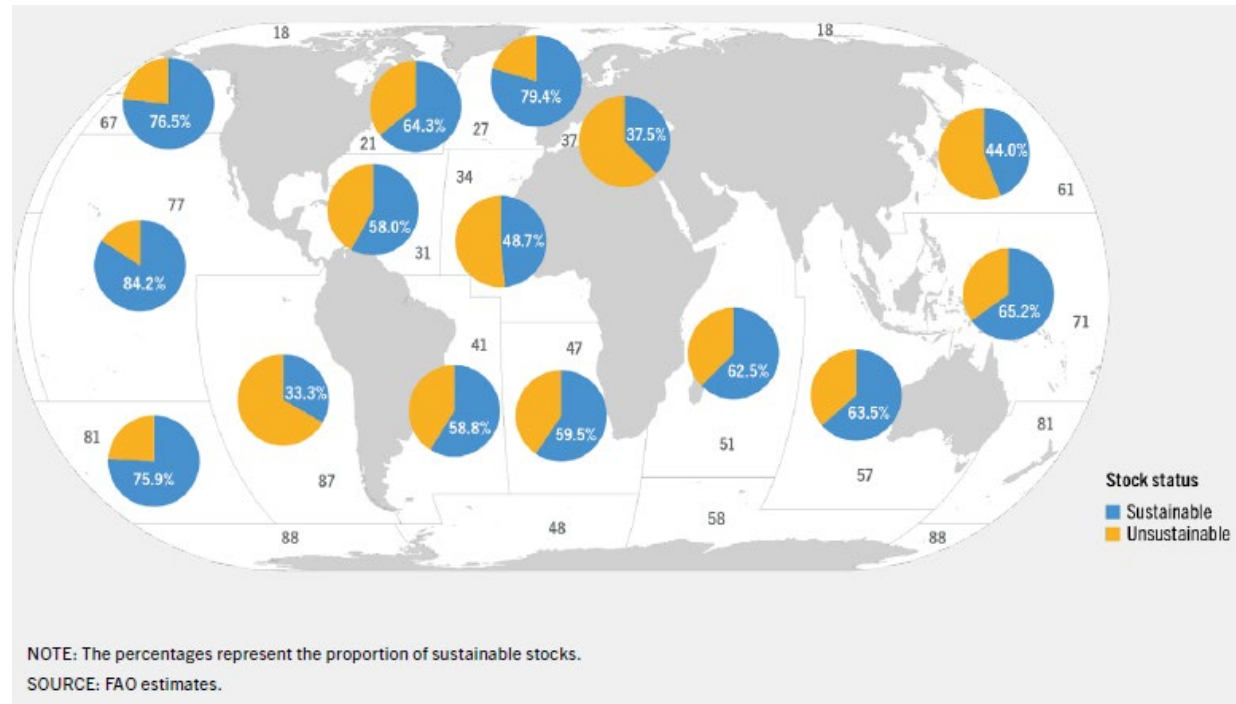


Figure 1: Percentage of biologically sustainable and unsustainable fisheries stocks by FAO major fishing area, 2021. Source: FAO, 2024.¹⁷

At the ecosystem level, IUU fishing often intensifies already existing overfishing, which is a major direct driver of species decline and ecosystem degradation, and reshapes entire marine ecosystems.¹⁵ Research shows that when discards and IUU fishing exceed 30% of reported catches, many Large Marine Ecosystems (LMEs) experience major losses in secondary production and declines in sustainability because the removal of prey species leaves less energy available for higher trophic levels.¹⁶ Targeting large, commercially valuable predators, such as sharks, tuna, and swordfish, disrupts trophic relationships, and fundamentally alters food-web structure and ecosystem functioning.¹⁷ For example, the collapse of cod-dominated systems in the Northwest Atlantic has led to proliferations of shrimp, crabs, and small pelagic fishes, fundamentally altering ecosystem structure and fisheries economies.¹⁸

¹⁴ FAO (2024).

¹⁵ Coll et al. (2008).

¹⁶ Coll et al. (2008).

¹⁷ Sumaila & Tai (2020); Long et al. (2020).

¹⁸ Baum & Worm (2009).

IUU fishing also undermines ecological integrity and threatens marine biodiversity. Illegal trawlers are often non-selective and catch large quantities of non-target species, including juveniles, endangered species, and marine mammals.¹⁹ In Indonesia, for every kilogram of shrimp caught, around 26 kilograms of other marine life are caught and discarded, contributing to major environmental damage and economic losses estimated at US\$1.4–3 billion annually. Globally, an estimated 9.1 million tons of fish are discarded at sea each year, further disrupting ecosystems and undermining stock recovery.²⁰

IUU fishing and climate change can interact in ways that compound pressures on marine ecosystems. IUU fishing accelerates climate-induced ecosystem decline by removing key reproductive individuals, degrading habitats, destabilizing food webs, and eroding the genetic and demographic resilience species need to adapt to environmental change. Fish populations already stressed by overfishing are far more vulnerable to rapid warming. For example, Atlantic cod and Atlantic herring populations at the warm edges of their thermal ranges were markedly more susceptible to productivity declines under warming than populations in cooler areas.²¹ Marine fish also play an important role in global carbon cycling, meaning that population declines can reduce the ocean's climate-regulating functions.²² Addressing IUU fishing is therefore essential not only for rebuilding fish stocks, but also for safeguarding biodiversity, maintaining ocean-based climate regulation, and protecting the coastal communities that depend on healthy marine ecosystems.²³ This can help generate additional GEBs that extend beyond the fisheries sector and benefit the global environment more broadly.

At the species level, IUU fishing can have especially severe impacts on high-value, migratory, slow-growing, and other vulnerable species. In the Atlantic tuna fishery, where high market prices have led to a rise in IUU fishing, the International Commission for the Conservation of Atlantic Tunas (ICCAT) estimates that vessels operating under Flags of Convenience (FOCs)²⁴ are responsible for around 10% of all tuna catches taken illegally, and these catches are not reflected in official stock assessments.²⁵ Highly valuable and migratory species such as tuna, sharks, and toothfish are particularly affected, as are vulnerable coastal stocks in regions such as the Western and Central Pacific Ocean and the Southern Ocean, with limited monitoring and enforcement capacity.²⁶

Some of the distinct examples of species-level collapse are linked to prolonged IUU fishing. Patagonian toothfish, often called “*white gold*” due to its exceptionally high market value, was

¹⁹ Obaidullah (2023).

²⁰ JALA & Environmental Justice Foundation. (2007).

²¹ Free et al. (2019).

²² Widjaja, S., Long, T., Wirajuda, H., et al. (2020).

²³ Andersen et al. (2024); Mariani et al. (2025).

²⁴ Flags of Convenience (FOCs) refer to the practice whereby a vessel is registered in a country different from the country of its ownership or control, allowing the ship to operate under the laws of the registering state rather than those of the owner's home country.

²⁵ Sumaila et al. (2006).

²⁶ Zhao et al. (2023); Widjaja, S., Long, T., & Wirajuda, H. (2022).

driven to near commercial extinction in the Southern Ocean by 1998.²⁷ IUU catches accounted for 68% of total catch in 1996–1997 and around 25–26% in 1998, peak years for illegal exploitation, prompting the Commission for the Conservation of Antarctic Marine Living Resources (CCAMLR) to characterize IUU fishing as a highly organized form of transnational crime.²⁸ In the Western Indian Ocean (WIO), IUU fishing accounts for over one-third of total fishing effort, making the region a global “dark spot” for shark, ray, and chimaera conservation. Currently, 45% of shark and ray species are at risk of extinction due to overexploitation.²⁹ A similar pattern is observed in the Caspian Sea, where Sturgeon landings collapsed from 30,000 tonnes in 1977 to just 286 tonnes by 2009. While the species could have achieved full recovery by 2008 in the absence of illegal removals, sustained IUU pressure will likely drive the species to extinction by 2042.³⁰

Economic Impacts

Globally, one-third of marine fish stocks are depleted, with even higher overexploitation in semi-enclosed seas such as the Mediterranean and Black Sea, where over 90% of assessed stocks are fished beyond sustainable limits.³¹ IUU fishing intensifies these impacts because it occurs outside monitoring systems, obscures true fishing mortality, and undermines the scientific basis for sustainable management.

Estimating the economic impacts is inherently difficult because IUU includes different activities—illegal, unreported, and unregulated fishing—that are often hard to distinguish in practice. For example, some catches may be unreported without being strictly illegal, especially in small-scale or artisanal fisheries where monitoring and reporting systems are weak or absent, making it difficult to distinguish lawful but unrecorded fishing from genuinely illicit activity. The hidden nature of IUU fishing further complicates measurement: catches may be misreported, discarded at sea, transshipped, or sold through informal and illicit markets, leaving major gaps in official data. As a result, most estimates rely on indirect methods, assumptions, trade data, and reconstructed catches rather than complete observed records, meaning that estimates of economic loss are often conservative and subject to considerable uncertainty.^{32,}

Available evidence shows that economic costs of IUU fishing are substantial. Illicit trade in marine fish, which is closely linked to IUU fishing, causes major economic losses worldwide. A significant share of unreported fish catches likely enters illicit trade channels, bypassing legitimate markets, avoiding taxes, and reducing benefits to coastal countries and fishing communities.³³ In West Africa, for instance, illegal catches have been estimated to be up to 40% higher than reported,

²⁷ Sumaila et al. (2006).

²⁸ Phelps Bondaroff et al., 2015

²⁹ Cochran et al. (2026).

³⁰ Heidari et al. (2012).

³¹ Costello et al. (2016).

³² Siebels (2020), Donlan et al. (2020), MRAG Asia Pacific. (2016).

³³ Sumaila et al. (2020).

resulting in US\$1.95 billion in lost economic value and US\$593 million in lost household income annually, with losses across the entire fish value chain.³⁴ Similarly, estimates suggest that illicit trade in marine fish leads to annual economic losses of US\$25.5–49.5 billion globally, including US\$6.8–13.3 billion in lost household income and US\$2.2–4.3 billion in lost tax revenues.⁴¹ For the whole of Africa, economic losses are estimated at US\$7.6–13.9 billion per year and income losses of US\$1.8–3.3 billion, while Asia faces even greater losses of US\$10.3–20.3 billion in economic impacts and US\$2.7–5.4 billion in income impacts. These two regions also account for the majority of global tax losses from the illicit seafood trade. When fish are diverted from legitimate trade channels, countries lose not only the value of the catch itself but also the wider economic benefits that normally flow through the fisheries value chain, including processing, transport, equipment supply, employment, household income, and taxation.

Another important economic dimension of IUU fishing is the stark imbalance between the value of illegal and unreported catches and the public expenditure allocated to manage and enforce fisheries regulations. Globally, governments spend an estimated US\$7 billion each year on fisheries management and a further US\$2 billion on the establishment and enforcement of marine protected areas, amounting to roughly US\$9 billion annually.³⁵ However, this level of investment is overshadowed by the scale of IUU fishing. Global estimates indicate that illegal and unreported fishing generates between US\$10–23.5 billion per year,³⁶ with some assessments placing its value as high as US\$41 billion.³⁷ As a result, the economic returns from IUU fishing substantially exceed global spending on fisheries management and enforcement.³⁸ This imbalance creates a powerful incentive structure in which the profits from IUU fishing outweigh both the likelihood of detection and the costs associated with penalties. Consequently, IUU fishing remains a low-risk, high-reward activity for operators, particularly in jurisdictions with limited monitoring and enforcement capacity and insufficient financial and human resources to effectively govern vast ocean areas.³⁹ This disparity highlights a structural weakness in global fisheries governance and underscores why IUU fishing persists despite ongoing management and enforcement efforts.

A key driver of these economic losses is the use of opaque financial and regulatory structures. One of the major enablers of IUU fishing is the combined use of tax havens and Flags of Convenience (FOCs), which afford companies the secrecy needed to maintain dual vessel identities, one used for lawful operations and another for illegal fishing, making detection and

³⁴ Widjaja, S., Long, T., Wirajuda, H., et al. (2020).

³⁵ Temple et al. (2022).

³⁶ Agnew et al. (2009); Note: The Agnew *et al.* (2009) study is based on data from 1980–2003 and does not include catches by artisanal fishers in the 50 countries examined. More broadly, precise estimates of IUU fishing are difficult to obtain due to its inherently hidden nature; as a result, scientific modelling and trade data are commonly used to approximate its scale.

³⁷ Pauly & Zeller (2016).

³⁸ Temple et al. (2022).

³⁹ Bray, K. (2001).

accountability exceedingly difficult.⁴⁰ While only a small share of the global fishing fleet is flagged to tax-haven jurisdictions, nearly 70% of vessels implicated in IUU fishing operate under these flags. This demonstrates how opaque financial and regulatory structures facilitate large-scale economic losses from illegal fishing. This concentration of IUU vessels in secret jurisdictions highlights the substantial economic risks posed by reduced tax revenues, distorted competition, and weakened governance in the global fisheries sector, reinforced by a lack of legal and policy coherence not only within but also across countries.

Social Impacts

IUU fishing has severe socio-economic consequences on fish-dependent communities and nations. It severely threatens livelihoods, food security, and other social benefits in many countries. Reduced fish stocks undermine nutrition for communities that rely on fish as a primary source of protein, while job losses and declining incomes affect not only fishers but also workers across entire seafood value chains.⁴¹

In many regions, IUU fishing exacerbates poverty and undermines economic stability, but also leads to instability and fragility, including a rise in illicit activities⁴² and is intertwined with criminal activities, including money laundering, corruption, human trafficking, drug smuggling, tax evasion, violence, and the exploitation of vulnerable labor indicating the presence of sophisticated criminal networks operating across borders and channeling illicit products into global markets.⁴³ Moreover, it is closely linked to organized crime, human rights abuses, and labor violations; estimates suggest that more than 128,000 fishers may be trapped in forced labor on fishing vessels worldwide.⁴⁴

IUU fishing also intensifies gender inequalities within fisheries-dependent and coastal communities.⁴⁵ Illegal fishing fleets deplete juvenile and nearshore stocks, destabilizing local food systems, increasing the risk of malnutrition, and forcing artisanal fishers to cope with gear losses, diminished access to traditional fishing grounds, and rising livelihood insecurity. The gendered impacts of these losses are particularly pronounced. Women, who make up 40% of the global small-scale fisheries workforce,⁴⁶ are disproportionately affected because they are heavily concentrated in post-harvest roles such as processing, marketing, and small-scale trading. These sectors are the first to experience reduced fish availability when IUU operations depress landings, exposing women to heightened economic shocks, income instability, and, in some contexts, unsafe or exploitative coping strategies.⁴⁷ As a result, IUU-driven stock declines not only

⁴⁰ Galaz et al. (2018).

⁴¹ Mackay et al. (2020).

⁴² [Illegal Fishing by Foreign Vessels Decimates Somali Fish Stocks - Africa Defense Forum](#) accessed on March 23, 2026.

⁴³ Phelps Bondaroff et al., 2015

⁴⁴ Widjaja, S., Long, T., Wirajuda, H., et al. (2020).

⁴⁵ Sumaila (2025).

⁴⁶ Cavole et al. (2025).

⁴⁷ Oloko et al. (2025).

undermine women's economic security but also amplify existing gender inequalities within fisheries-dependent communities.⁴⁸

IUU fishing is increasingly intertwined with broader geopolitical tensions, particularly in regions where maritime boundaries, resource rights, and competing security interests converge. Disputes frequently arise between coastal states seeking to protect their exclusive economic zones and distant-water fishing nations with expanding resource demands, as well as among states that interpret ocean governance norms, freedom of navigation, and enforcement responsibilities differently. For example, nations may differ in their approach to the implementation and interpretation of regulations related to the freedom of navigation, ports of entry, or new employment tracking and transparency technologies.

3. Addressing IUU fishing

International instruments and initiatives to address IUU fishing

Since the 1980s, several international and regional agreements have emerged to safeguard marine fish stocks, promote responsible fisheries, and strengthen transboundary cooperation. The 1982 UN Convention on the Law of the Sea (UNCLOS)⁴⁹ provides the basis for the protection and use of the oceans' living and non-living resources and is therefore foundational to addressing IUU fishing.

It is complemented by subsequent and related instruments, such as the 1993 Agreement to Promote Compliance with International Conservation and Management Measures by Fishing Vessels on the High Seas⁵⁰ (FAO Compliance Agreement) and the 1995 Agreement for the Implementation of the Provisions of the United Nations Convention on the Law of the Sea of 10 December 1982 relating to the Conservation and Management of Straddling Fish Stocks and Highly Migratory Fish Stocks (UN Fish Stocks Agreement - UNFSA),⁵¹ which provide specific obligations.

The FAO Agreement on Port State Measures (PSMA), adopted in 2009,⁵² is the first legally binding international treaty specifically designed to combat IUU fishing, establishing port-state controls to prevent vessels engaged in IUU activities from landing or transshipping their catch. This binding instrument is complemented by global initiatives such as the FAO International Plan of Action to Prevent, Deter and Eliminate IUU Fishing (IPOA-IUU, 2001), a voluntary framework that introduced the first internationally agreed definitions of "illegal," "unreported," and

⁴⁸ UNODC (2023).

⁴⁹ UNCLOS has 172 parties (171 states + the European Union).

⁵⁰ 45 parties

⁵¹ 94 Parties

⁵² 85 Parties

“unregulated” fishing and encouraged states to develop comprehensive national strategies to address these activities.

The Joint Working Group (JWG) on IUU Fishing, established by the FAO, the International Labor Organization (ILO), and the International Maritime Organization (IMO), is a primary vehicle for implementing some of the aforementioned provisions.⁵³ In partnership with other international organizations (such as the UN Office on Drugs and Crime (UNODC)) but also with non-governmental organizations (NGOs) (such as the World Wildlife Fund (WWF)), the JWG has increasingly expanded its reach and increased cooperation across different actors, breaking previous silos.⁵⁴

The 2022 Agreement on Fisheries Subsidies focuses on government subsidies for IUU fishing (as well as fishing overfished stocks and fishing on unregulated high seas). This adds another potentially powerful instrument to tackle IUU fishing from yet another—potentially highly effective—perspective. See Box 2.

Box 2: Prohibition on Subsidies to IUU Fishing⁵⁵

The World Trade Organization (WTO) Agreement on Fisheries Subsidies, adopted at the Twelfth Ministerial Conference on June 17, 2022, represents major progress for ocean sustainability. It establishes binding international disciplinary measures to prohibit harmful fisheries subsidies that contribute to the depletion of global fish stocks and undermine effective fisheries management.

The Agreement strengthens the global framework for sustainable fisheries by prohibiting subsidies to IUU fishing, to fishing overfished stocks, and to fishing activities in the unregulated high seas, where conservation and management measures are weak or absent. Once a final determination of IUU fishing is made by a coastal state, flag state, or a competent regional fisheries body, parties are required to withdraw subsidies to the vessels or operators concerned, in accordance with internationally recognized definitions, due process, and transparency requirements.

By removing incentives that enable unsustainable and illegal fishing practices, the Agreement supports the development of a sustainable blue economy and the livelihoods, food security and incomes of millions of people worldwide, particularly in developing countries. It delivers on the mandate of Sustainable Development Goal target 14.6, while incorporating special and differential treatment, technical assistance, and capacity-building support for developing countries and least developed countries to facilitate effective implementation.

In addition, the most recent Biodiversity Beyond National Jurisdiction (BBNJ) Agreement adds an additional layer of governance, with the potential to enhance coordination among existing institutional frameworks. It also helps RFMOs to advance science, information exchange, and

⁵³ Auld et al. (2023).

⁵⁴ Auld et al. (2023).

⁵⁵ World Trade Organization. (2022); International Institute for Sustainable Development (2020).

ecosystem-based management, setting standards for Environmental Impact Assessments (EIAs) in areas beyond national jurisdiction, further reinforcing global efforts against IUU fishing.⁵⁶

At the regional level, RFMOs serve as the primary institutional mechanisms for coordinating conservation and management measures, curbing harmful fishing practices, and ensuring compliance with agreed mandates across shared and transboundary fisheries. They cover specific regions or species groups (most commonly for tuna fisheries) and adopt binding conservation measures, oversee MCS systems, maintain IUU vessel lists, and implement procedures that support long-term sustainability.

In addition, market-based regional regulations also play a critical role, particularly in major importing countries. The 2010 EU IUU Regulation⁵⁷ builds on earlier such regulations from 2001 and 2004 and is the most advanced regional regulation on IUU fishing. For instance, it requires all fisheries products imported into the EU (or exported from the EU) to be validated as legal through a catch certificate scheme (in digital format since 2026, further increasing transparency while closing loopholes), and engages with non-EU countries suspected of inadequately fighting IUU fishing through dialogue. The EU IUU Regulation also allows for sanctions and provides for penalties to be issued for EU nationals engaging in IUU fishing, no matter where in the world and under which flag. This is a powerful regulatory tool to incentivize sustainable fishing—especially because of the importance of the EU market, the largest importer of fish worldwide. These global instruments are increasingly supported by high-level political commitments to address IUU fishing (Box 3).

Box 3: High-level Political Commitments to address IUU Fishing

Despite the existence of robust governance mechanisms, including binding international agreements, RFMOs, and national regulatory frameworks, implementation remains highly uneven. As a result, IUU fishing operations routinely exploit gaps between jurisdictions, limited enforcement capacity, and fragmented governance structures.

Recognizing both the governance challenges and the maritime security implications, high-level political bodies have also begun to issue stronger commitments to address IUU fishing. This includes the G7 Foreign Ministers' Declaration on Maritime Security and Prosperity (2025), which reaffirmed the G7's commitment to a secure maritime domain, sustainable marine resource use, and adherence to UNCLOS, while explicitly highlighting concerns over illicit maritime activities, including IUU fishing. The 2024 G20 Agriculture and Fisheries Ministers Declaration, similarly emphasized the *"urgent need to prevent, deter and eliminate IUU fishing,"* calling for strengthened implementation of key international instruments, such as the FAO Port State Measures Agreement (PSMA) and other global and regional commitments.

⁵⁶ Smith & Rioux (2026); Kim (2024).

⁵⁷ Council Regulation (EC) No 1005/2008 of 29 September 2008 establishing a community system to prevent, deter and eliminate illegal, unreported and unregulated fishing. *Official Journal of the European Union*, L 286, 29.10.2008, 1–32.
Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32008R1005>

Likewise, the 2019 G20 Osaka Leaders' Declaration reaffirmed that IUU fishing remains “*a serious threat*” to ocean sustainability and reiterated their commitment to ending IUU fishing, aligning their pledge with SDG 14 and broader global development goals.

These commitments reflect growing political attention to IUU fishing, while underscoring the need to translate these pledges into effective implementation on the ground.

Although many efforts to curb IUU fishing are international, national governments must initiate much of the action, including various non-governmental initiatives and partnerships between environmental NGOs and the scientific community. Many of these initiatives have issued guidance on how to address IUU-related problems,⁵⁸ including human rights, labor rights and safety issues (Box 4). The Global Charter for Fisheries Transparency,⁵⁹ for example, puts forward ten policy principles to be adopted to increase transparency in fisheries, many of them relevant for IUU fishing.

Box 4: Human Rights, Labor Rights and Safety⁶⁰

IUU fishing is frequently associated with labor exploitation, human trafficking, and unsafe working conditions at sea. These risks are addressed through complementary international instruments developed by the ILO and the IMO.

Key instruments include the ILO Work in Fishing Convention, 2007 (No. 188), which establishes standards for working and living conditions in the fishing sector, as well as the IMO Cape Town Agreement and the Standards of Training, Certification, and Watchkeeping for Fishing Vessel Personnel (STCW-F) Convention, which set requirements for fishing vessel safety and crew training. Together, these frameworks help reduce vulnerabilities in the fishing sector by improving labor protections, vessel safety, and professional standards, thereby addressing conditions that allow IUU fishing to persist.

Together, these legal and policy instruments, as well as scientific and civil society guidance, provide a comprehensive framework of principles for addressing IUU fishing as a major impediment to sustainable fisheries. Figure 2 shows steady global progress in implementing international instruments to combat IUU fishing between 2018 and 2024, with most regions reporting measurable improvements. However, regional disparities persist, indicating that limited implementation capacity in some areas may continue to undermine the economic benefits of effective IUU deterrence.

⁵⁸ A large number of NGOs work on sustainable fisheries. Fewer organizations explicitly address IUU. These include, for instance, the IUU Fishing Action Alliance (IUU-AA), and the EU IUU Fishing Coalition. Several philanthropies financially support such efforts, including the Gordon and Betty Moore Foundation.

⁵⁹ Coalition for Fisheries Transparency (2024).

⁶⁰ Auld et al. (2023)

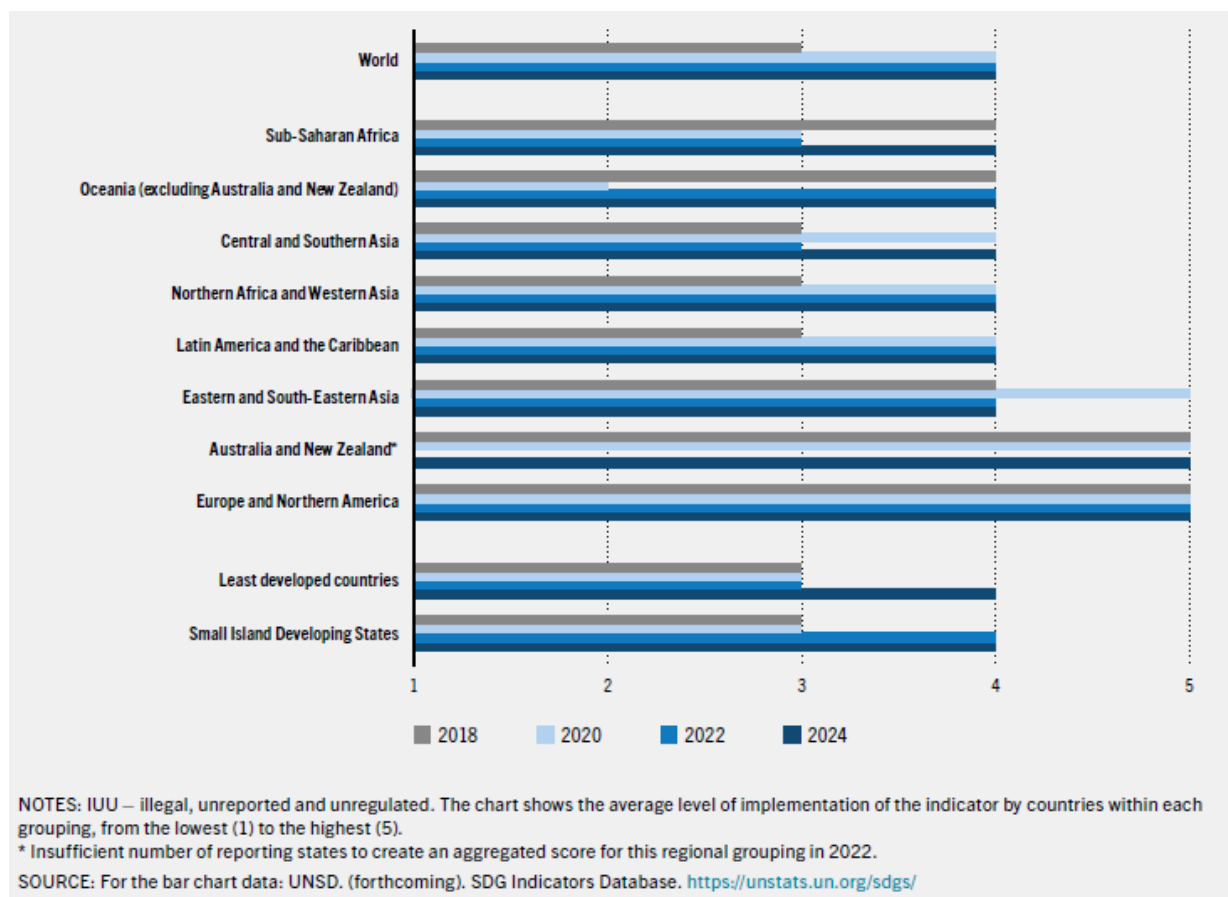


Figure 2: Progress in the degree of implementation of international instruments aimed at combating IUU fishing by region, 2018-2024. Source: FAO, 2024.¹⁷

Technological advances for combating IUU

In the past years, new and emerging technologies have played an increasingly important role in reshaping the fight against IUU fishing. Advances in digital and satellite-based technologies have been key to this shift, prompting governments, RFMOs, and market actors to identify, monitor, and respond to illegal fishing. Tools such as artificial intelligence (AI), satellite surveillance, electronic monitoring, and electronic catch documentation and traceability (eCDT) systems are enhancing the transparency by enabling near-real-time detection of suspicious activity (such as turning off their Automatic Identification System (AIS) and Vessel Monitoring System (VMS), transshipment of catches, etc.) and strengthening oversight along increasingly complex supply chains. These innovations are particularly critical given that an estimated 98% of the global fishing fleet does not publicly broadcast its location, leaving substantial blind spots that IUU operators have historically exploited.⁶¹ Moreover, research has found that satellite surveillance—often

⁶¹ Welch et al. (2024).

conducted by non-state actors—is more effective than direct action (at sea) or longer-term market certification schemes.⁶²

Despite these technological advances, significant governance and participation gaps continue to undermine global progress. One of the most persistent challenges is the non-participation or weak participation of states in key international instruments, particularly the PSMA, specifically designed to prevent illegally caught fish from entering ports. Evidence from RFMO IUU vessel lists and Trygg Mat Tracking (TMT) analyses shows that over half of identified IUU vessels operate under unknown flags, and more than one-third sail under flags of states that are not parties to the PSMA. This creates a structural vulnerability in the global enforcement regime: vessels can deliberately seek out “safe haven” ports where inspections are minimal and legal scrutiny is weak, allowing them to offload illegal catch with relative impunity.

4. GEF’s strategic role in combating IUU fishing for GEBs

The GEF has been committed to healthy oceans since its inception. The GEF is the world’s largest funding mechanism for several multilateral environmental agreements (MEAs) and is uniquely positioned to address IUU fishing. IUU fishing sits at the heart of the GEF’s mandate as it directly undermines marine biodiversity, ecosystem services, and the livelihoods of coastal communities.

IUU fishing threatens multiple GEBs and co-benefits the GEF seeks to achieve, including sustainable fisheries and marine biodiversity conservation, the protection of critical habitats and marine ecosystems, climate resilience of coastal and marine systems, and food security and sustainable livelihoods. Given its transboundary nature, addressing IUU fishing requires coordinated international action—an area where the GEF’s convening power, financing role, and experience in regional and global programming provide clear comparative advantages.

The GEF has addressed IUU fishing through its International Waters (IW) focal area, with a focus on transboundary cooperation, sustainable fisheries management, and support for international instruments such as the PSMA. In doing so, GEF addresses SDG 14.4 by supporting science-based fisheries management, strengthening monitoring, control, and surveillance systems, reducing IUU fishing, and delivering multiple GEBs—including marine biodiversity conservation (GBF Targets 4, 5, 10, 14, 18, and 20), climate resilience, and the health of coastal and island ecosystem areas that span several GEF focal areas and Integrated Programs. A list of GEF projects and mechanisms through which IUU is addressed is presented in Table 1.

GEF Projects have strengthened fisheries governance and significantly expanded monitoring and enforcement systems—including VMS, patrols, and observer programs to tackle IUU fishing. Terminal evaluations of projects indicate that projects have contributed to reducing IUU incidents, for instance, in Cabo Verde, Liberia, Senegal, and Sierra Leone (GEF ID 3558), where

⁶² Wicker et al. (2026).

reported declines in IUU fishing and related infractions were achieved through strengthened surveillance, enforcement, and governance measures, thereby improving compliance. At regional and global levels, market-driven initiatives, traceability tools, and multi-stakeholder platforms have further promoted transparency and science-based management to deter IUU practices (GEF ID 5271).

Table 1: Examples of GEF IUU fishing-related projects and mechanisms of interventions.

Geographical Region	Mechanisms through which IUU is Addressed	GEF Projects
Pacific Islands	• Establishment of regional management frameworks (Western and Central Pacific Fisheries Commission - WCPFC) to reduce high-seas IUU fishing • Strengthening MCS: VMS, observers, port inspections, joint patrols • National legal reforms aligning with UNFSA, UNCLOS, WCPFC Conservation and Management Measures (CMMs) • Regional coordination (Pacific Islands Forum Fisheries Agency (FFA) and the Pacific Community (SPC))	2131 – <i>Pacific Islands Oceanic Fisheries Management Project (GEF-3, UN Development Program (UNDP))</i> 4746 – <i>Implementation of Global and Regional Oceanic Fisheries Conventions and Related Instruments in Pacific Small Island Developing States (SIDS) (GEF-5, UNDP, FAO)</i>
West Pacific & East Asian Seas	• Expansion of national VMS/MCS systems • Strengthening compliance with WCPFC through legal reforms. • Ecosystem-based tuna management plans to reduce unreported catch. • Market-based compliance, certification readiness, and traceability improvements. • Regional database aligned with WCPFC for IUU detection.	5393 – <i>Sustainable Management of Highly Migratory Fish Stocks in the West Pacific and East Asian Seas (GEF-5, UNDP)</i>
West Africa	• Strengthened national MCS centers, surveillance infrastructure, patrols • Regionally coordinated satellite-based VMS through the Sub-Regional Fisheries Commission (CSRP) • Full vessel registration/licensing to stop illegal access • Legal reforms introducing total allowable catch (TAC) quotas, effort controls • Community surveillance; transparency of infractions	3558 – <i>SP-SFIF: West Africa Regional Fisheries Program (WARFP) (GEF-3, The World Bank)</i> 4280 – <i>SP-SFIF: West Africa Regional Fisheries Program APL B1 (GEF-3, The World Bank)</i> 4528 – <i>West Africa Regional Fisheries Program in Ghana (GEF-4, The World Bank)</i> 9360 – <i>West Africa Regional Fisheries Program – Additional</i>

	• Shared regional databases enabling IUU cross-border detection	<i>Financing (GEF-6, The World Bank)</i>
Western Indian Ocean (Southern African Development Community (SADC) / Mozambique Channel)	• Community surveillance hubs and coastal patrol support • Harmonization of sub-regional rules via SADC frameworks • Shared regional fisheries database and monitoring indicators • Nature-based enforcement (protecting nursery habitats to deter destructive fishing) • Alternative livelihoods and livelihood diversification	<i>11452 – Program for Improving Sustainable Marine Fisheries Opportunities in SADC – Mozambique Channel (GEF-8, African Development Bank)</i>
Southeast Pacific (Chile–Peru–Ecuador)	• National rollout of eCDT covering all priority fisheries • Adoption of Global Dialogue on Seafood Traceability (GDST) standards for interoperable traceability • Tri-national data sharing for joint IUU enforcement • Linking eCDT to real-time MCS enforcement workflows	<i>11674 – The Digital Seafood Revolution: Electronic catch documentation and traceability systems (eCDT) for sustainable and legal fisheries in Chile, Peru, and Ecuador (GEF-8, UNEP)</i>
Global (Tuna RFMOs, Marine commodities Supply Chains & EM Expansion)	• Strengthening MCS across tuna RFMOs (VMS, electronic observers, electronic monitoring (EM) pilots). • Integrating FAO Global Record to track authorized vessels globally. • Strengthened traceability and electronic catch documentation to block IUU supply. • Market-driven, compliance-procurement standards and buyer policies • Scaling EM standards and interoperability tools • RFMO compliance, sanctions, legal reviews • Adoption of sustainable sourcing policies excluding IUU-linked products • Development of traceability toolkits and anti-fraud systems • National-level training on traceability, licensing compliance, and MSC standards	<i>4581 – Sustainable Management of Tuna Fisheries and Biodiversity Conservation in the Areas Beyond National Jurisdiction (ABNJ) (GEF-5, FAO)</i> <i>5271 – Global Sustainable Supply Chains for Marine Commodities (GEF-5, UNDP)</i> <i>11996 – Accelerating Electronic Monitoring in Tuna Fisheries for Strengthening Transparency and Addressing Illegal, Unreported, and Unregulated Fishing (EM4IUU) (GEF-8, Conservation International)</i>

	• Implementing fishery improvement projects (FIPs) to improve on-water compliance.	
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IUU fishing, especially in coastal waters, is also driven by local communities' economic interests and the unavailability of other livelihoods. Addressing IUU fishing, therefore, also requires engaging with communities to diversify livelihoods/provide alternative livelihoods. The GEF has worked on this dimension of IUU fishing, for instance, in GEF ID 11452, which, among other elements, focused on diversifying livelihoods along the coasts. This provides important lessons on how to incorporate livelihood considerations and community engagement into potential future GEF activities, ensuring a comprehensive, integrated approach to combating IUU fishing that accounts for all relevant actors and delivers co-benefits to communities.

A selection of national and regional GEF-supported projects to address IUU fishing is presented in Figure 3.

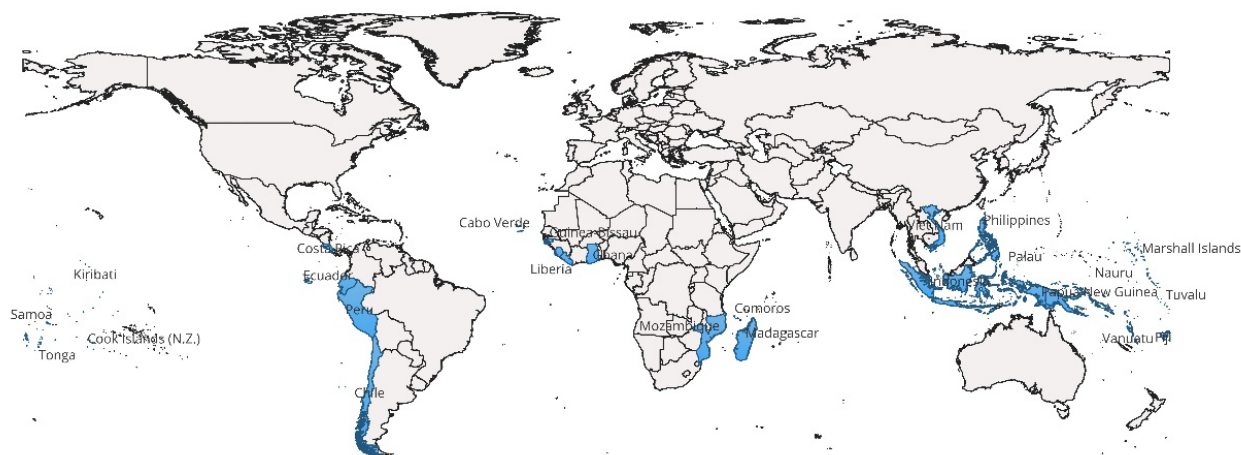


Figure 3: Geographical coverage of selected national and regional GEF-supported projects to address IUU (highlighted in blue).⁶³

Strengthening GEF action on IUU fishing

Given the cross-cutting nature, there is a strong rationale for integrating IUU considerations across all relevant GEF programming beyond only the IW focal area, including, for example, the Biodiversity Focal Area, the Blue and Green Islands and Food Systems Integrated Programs, and GEF-wide efforts to strengthen governance, monitoring, policy coherence, and cross-sector collaboration. The GEF can further advance its work on IUU fishing as a strategic priority across

⁶³ World Bank. *World Bank Official Boundaries (WBO)*. Retrieved from <https://datacatalog.worldbank.org/search/dataset/0038272/world-bank-official-boundaries>. Map created by the STAP using QGIS.

these areas to enable more coherent, systemic, and impactful interventions aligned with the GEF-9 vision of an integrated, whole-of-government and whole-of-society approach.

International Waters Focal Area

GEF's International Waters (IW) programming is uniquely positioned to address the transboundary dimensions of IUU fishing as demonstrated by past projects. IW interventions can further strengthen regional cooperation by supporting harmonized fisheries management frameworks, ecosystem-based approaches to coastal and ocean governance, and establishing or strengthening existing platforms for joint surveillance and information sharing. In parallel, IW programming can help countries advance sustainable and regenerative blue economy initiatives, including tourism, marine recreation, energy, shipping, fishing, and aquaculture, which create livelihood opportunities for coastal communities. By improving economic resilience and engaging communities directly in resource stewardship, these interventions can also enhance fisheries productivity and reduce the ecological and socioeconomic pressures that often drive illegal fishing. GEF's involvement in supporting the implementation of the BBNJ Agreement also creates opportunities to strengthen various governance mechanisms, including the RFMOs, to enhance monitoring, control, and enforcement in areas beyond national jurisdiction to combat IUU fishing on the high seas.

Biodiversity Focal Area

One of the three objectives of the GEF-9 Biodiversity Focal Area is to improve the conservation, sustainable use, and restoration of natural ecosystems through integrated landscape and seascape approaches. Interventions that enhance the management effectiveness of marine and coastal protected areas by addressing direct threats to ecosystem integrity, together with strengthened conservation planning and enforcement capacities, equip countries and regions to better monitor and safeguard biodiversity-rich seascapes against illegal fishing pressures.

The Biodiversity Focal Area (BDFA) also promotes governance reforms, policy coherence, and whole-of-government and whole-of-society engagement to address biodiversity threats. It helps establish more effective monitoring systems that improve compliance and, ultimately, deter IUU fishing. This is accomplished by strengthening cross-sector coordination, enabling more effective joint surveillance, enforcement, and information sharing across marine and coastal domains, and by empowering Indigenous Peoples, local communities, women, and youth as key actors in conservation and resource management.

The Blue and Green Islands Integrated Program (BGI-IP)

Through the Blue and Green Islands Integrated Program (BGI-IP), the GEF can help address IUU by applying integrated approaches that strengthen sustainable management of coastal and marine ecosystems and reduce drivers of ecosystem degradation.

Specifically, under this IP, the GEF can support in improving the sustainability of small-scale fisheries and strengthening community-led monitoring of fishing activities through active engagement of local communities and civil society. In addition, the program can advance integrated spatial planning and marine resource governance, including fisheries management, tailored to SIDS' unique geographic contexts. This can include establishing or strengthening IUU-specific regulation and governance arrangements, including monitoring and enforcement mechanisms, but also advancing capacity and providing technology where necessary. By leveraging the GEF's extensive experience working in SIDS, these interventions help address both the root causes and the impacts of IUU fishing in small-island environments.

The Food Systems Integrated Program (FSIP)

The FSIP can help address key enablers that allow IUU fishing to persist, including governance gaps, harmful subsidies, weak monitoring systems, and distorted market incentives. Within the scope of the FSIP, interventions that target the transformation of marine food production systems, strengthen value-chain traceability, and eliminate harmful fisheries subsidies can significantly reduce the drivers of IUU fishing. The IP can support countries to identify, reform, or repurpose harmful subsidies within fisheries-related food systems and help align national incentive frameworks with WTO disciplines on subsidies to IUU fishing (Article 3) and unregulated high-seas fishing (Article 5.1).⁶⁴ In addition, the FSIP can strengthen sustainable, legal small-scale fish value chains and expand alternative livelihood opportunities in coastal food systems, reducing economic dependence on illegal catch.

5. Recommendations

As the GEF moves into GEF-9, scaling up and integrating efforts to combat IUU fishing will be essential to achieving GEBs in the marine sector. Five strategic directions can be identified:

1. Strategic and systematic integration of IUU fishing across relevant GEF portfolios

Recognizing the integrated nature and the complexity of IUU fishing that straddles several aspects of GEBs, the GEF may:

- Ensure IUU fishing is consistently addressed across relevant marine projects within the IW portfolio and in relevant Integrated Programs (IPs)—including those focusing on marine protected areas, marine pollution, and the blue economy—to maximize synergies and ensure policy coherence while avoiding fragmented approaches.
- Systematically integrate IUU fishing into programming in focal areas and IPs under biodiversity, climate adaptation, and food systems, to prevent unintended impacts of project interventions (e.g., including IUU risk screening in food systems, fisheries,

⁶⁴ Van Damme (2020); Alger et al. (2023).

marine commodities, and value-chain projects; incorporating IUU fishing considerations in biodiversity conservation and Kunming-Montreal Global Biodiversity Framework (KMGBF) projects, and ensuring climate adaptation/resilience projects recognize IUU as a driver affecting marine ecosystems, in addition to climate drivers).

- Incorporate underlying drivers of IUU fishing through environmental and social safeguard processes to mitigate unintended social, economic, and environmental consequences across GEF interventions.
- Consider multifocal area or multi-trust fund projects that bring resources together to address joint objectives that include IUU fishing where appropriate (including IW focal area).

2. Improve data systems and transparency using technology

Given the importance of closing the fisheries information and transparency gap, the GEF may:

- Enhance investment to support the development, adoption, and advancement of innovative monitoring technologies, including satellite tracking, AI-based analytics, and electronic monitoring systems, and support the development of required capacity among relevant actors in partner countries and organizations.
- Support vessels tracking and transparency on vessel licenses, vessel ownership and vessel positions (where appropriate) with the help of international platforms.
- Support the development of interoperable data systems and platforms for fisheries monitoring to foster data exchange among a wide range of relevant actors, extending transparency all the way to the consumers.
- Support the expansion of electronic catch documentation and traceability across the entire seafood supply chain to improve market accountability among relevant commercial actors, including through public-private partnerships, as well as with consumers.
- Integrate the aspect of traceability of seafood along supply chains in relevant projects and programs.
- Increase open access to and availability of data and the scientific assessment of the state of fishing and fisheries.

3. Strengthen governance and capacity for prevention, detection, and enforcement

Acknowledging the lack of implementation and enforcement in combating IUU fishing and the underlying governance challenges, the GEF may:

- Support the development of regulations, institutions, and policies in relevant countries (including, in particular, port states) to effectively address IUU fishing on a sound legal and institutional basis, supporting policy coherence.

- Support the development of national and regional monitoring, control, and surveillance capacity as a basis for implementing and enforcing relevant regulations and policies, including both relevant state and non-state actors.
- Support collaboration with national and international enforcement agencies addressing illegal wildlife trade and related crime⁶⁵ and relevant national customs, wildlife, and law-enforcement authorities, to strengthen cross-border surveillance, information-sharing, and enforcement.
- Support communities in adopting and implementing sustainable fisheries practices through generating tangible co-benefits and alternative livelihoods and income diversification for communities from sustainable fisheries, especially through integrated programming approaches.

4. Enhance regional and global cooperation

In light of the transboundary nature of fisheries in general, and IUU fishing in particular, the GEF may

- Support the development and implementation of, and compliance with, existing international instruments that set clear standards for fishing and/or regulate fishing at global or regional levels.
- Strengthen the capacity of countries to adhere to and implement the FAO Port States Measures Agreement to ensure effective port controls to prevent IUU catches from entering markets.
- Support the implementation of existing regional and international legal and policy frameworks that address IUU fishing and strengthen required institutional capacity.
- Support regional cooperation through appropriate legal and institutional mechanisms, such as RFMOs and similar platforms, and actively strengthen them.
- Align GEF initiatives and investments with other existing and emerging governmental and non-governmental initiatives that directly or indirectly address IUU fishing-related challenges, pursuing a whole-of-society approach.

5. Broaden the range of stakeholders/engage with a variety of stakeholders in innovative manner

Acknowledging the multi-actor, multi-sector and multi-level nature of IUU fishing and the fight against it, the GEF can consider a whole-of-society approach and may:

- Engage with all relevant actors and stakeholders, including the private sector, along the value chain—all the way to the customer—in an integrated manner, including by enhancing transparency and strengthening awareness of the buyers.

⁶⁵ Those include, for instance, the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Secretariat, International Criminal Police Organization (INTERPOL), the World Customs Organization (WCO), and UNODC.

- Support behavior change among relevant stakeholders to incentivize compliance with fishing regulations through creating awareness and ownership of shared fisheries resources and ecosystems in order to improve protection, especially through capacity development.

Conclusion

IUU fishing is a major threat to marine ecosystems, economic development, and social well-being. As demand for seafood increases and regulation, monitoring and enforcement fail to keep up, IUU's impact on marine ecosystems, fish stocks, and biodiversity, as well as communities and countries, intensifies. This leads to severe damages to fish stocks and marine biodiversity as well as numerous negative socioeconomic impacts. Moreover, its close entanglement with geopolitical developments as well as security and human rights issues makes it an increasingly important but also highly complex topic of regional and global relevance.

The GEF's longstanding engagement in ocean governance, combined with its ability to convene partners and finance initiatives at different governance levels, positions it as a key actor in addressing this challenge. Building on its evolving portfolio and lessons learned, the GEF can use GEF-9 to scale up integrated, technology-enabled, and cooperative approaches that not only detect and deter IUU fishing but also address its underlying drivers. By doing so, the GEF can help safeguard marine biodiversity, strengthen sustainable fisheries, and support the communities that depend on healthy oceans.

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