

WorldFish Comments on 34th Session of the Committee of Fisheries (COFI)

Agenda item #9: Combatting Illegal, Unreported and Unregulated (IUU) fishing

Worldfish and our partners within the CGIAR Research Program on Fish Agri-Food Systems and CGIAR are keen to emphasize the risks posed in criminalizing small-scale fisheries (SSF) in Combatting Illegal, Unreported and Unregulated (IUU) fishing. Many SSF are unregulated (by the State) and their catches are unreported to government. This is not an example of criminality, but instead reflect the shortfall in State and/or fishing community regulatory capacity. In some cases, it may signify the existence of successful alternative, non-state regulatory regime such as community-based management as highlighted in a recent research paper that WorldFish contributed on this topic (Song et al. 2020)^[1]. The paper argues that SSF can be considered as ‘collateral damage’ in efforts to eliminate IUU fishing.

Instead of pursuing a ‘securitized’^[2] response to IUU fishing in small-scale fisheries - WorldFish is conducting research to develop and test low-cost, open-source monitoring software solutions for fisheries managers and stakeholders^[3] to improve reporting and drive science-based decision making in SSF. The lack of reporting in SSF exacerbates their exclusion from decision-making processes and the equitable sharing of benefits in the Blue Economy.

In response to these concerns, we would like to suggest that COFI consider the following two recommendations:

- 1) undertaking an audit of programs and initiatives aimed to address IUU to ascertain whether small-scale fisheries are impacted negatively as ‘collateral damage’ in the fight to eliminate IUU. This should focus on key geographies critical to countering IUU, such as the Gulf of Guinea and Pacific Island States with results reported in the SOFIA report.
- 2) Supporting the development of a platform of fisheries monitoring tools and knowledge that provides low-cost, open-source solutions and options for countries to specifically improve reporting of small-scale fisheries, while integrating strong data protection and ownership for fishers. Furthermore, targeted research in this area would allow for the FAO and COFI members to endorse and advocate for specific systems that have shown positive outcomes according to IUU goals.



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Director General

Read our **WorldFish 2030 Research and Innovation Strategy**
(available to [download here](#))

^[1] Song AM, Scholtens J, Barclay K, Bush SR, Fabinyi M, Adhuri DS, Haughton M (2020) Collateral damage? Small-scale fisheries in the global fight against IUU fishing. *Fish Fish* 21:831–843.

^[2] ‘Securitization’ refers to an approach that reframes an issue (in this case overharvesting) as a threat to national security. This justifies a militarized approach to addressing it – covert surveillance, armed naval patrols, arrests or military action etc – rather than an approach built on identifying root causes of overfishing and addressing those – tenure reform, improved rights and responsibilities in international fishing agreements, strengthened community-based management in inshore fisheries etc. A securitized response makes building collaborative management more difficult in the long term

^[3] Tilley A, Dos Reis Lopes J, Wilkinson SP (2020) PesKAAS: A near-real-time, open-source monitoring and analytics system for small-scale fisheries. *PLoS One* 15:e0234760.