

# Illegal, Unreported, and Unregulated Fishing

October 13, 2022
Fiscal Year 2022 Report to Congress



#### Foreword

October 13, 2022

I am pleased to present the following report, "Illegal, Unreported, and Unregulated Fishing," which has been prepared by the U.S. Coast Guard.

This report was compiled pursuant to the Joint Explanatory Statement and House Report 117-87 accompanying the Fiscal Year 2022 Department of Homeland Security Appropriations Act (P.L. 117-87), which direct the Coast Guard to provide an international Illegal, Unreported, and Unregulated (IUU) fishing strategy to preserve the integrity and free flow of commerce, to protect natural resources and food security, and to contribute to socioeconomic stability in the regions impacted by IUU fishing.



Pursuant to congressional requirements, this report is being provided to the following Members of Congress:

The Honorable Lucille Roybal-Allard Chairwoman, House Appropriations Subcommittee on Homeland Security

The Honorable Chuck Fleischmann Ranking Member, House Appropriations Subcommittee on Homeland Security

The Honorable Chris Murphy Chair, Senate Appropriations Subcommittee on Homeland Security

The Honorable Shelley Moore Capito Ranking Member, Senate Appropriations Subcommittee on Homeland Security

I am happy to answer any further questions you may have, or your staff may contact my Senate Liaison Office at (202) 224-2913 or House Liaison Office at (202) 225-4775.

Sincerely,

Linda L. Fagan

Admiral, U.S. Coast Guard

Commandant



## Illegal, Unreported, and Unregulated Fishing

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#### I. Legislative Requirement

This report was compiled in response to direction in the Joint Explanatory Statement and House Report 117-87 accompanying the Fiscal Year 2022 Department of Homeland Security Appropriations Act (P.L. 117-103).

The Joint Explanatory Statement states:

Illegal, Unreported, and Unregulated (IUU) Fishing.—The Coast Guard is directed to submit an international IUU fishing strategy, as outlined in House Report 117-87. This strategy should be submitted in unclassified form but may include a classified annex.

#### House Report 117-87 states:

Illegal, Unreported, and Unregulated (IUU) Fishing.—The Committee understands that IUU fishing is related to piracy, drug trafficking, human trafficking, and forced labor, and has accounted for billions of dollars in losses for the global fishing industry. The Coast Guard is directed, not later than 180 days after the date of enactment of this Act, to submit an international IUU strategy to preserve the integrity and free flow of commerce, protect natural resources and food security, and contribute to socioeconomic stability in the regions impacted by IUU. The strategy should identify resource requirements for increased monitoring; the collection of enforcement-quality data and intelligence; real-time response by surface-based enforcement assets; and IUU enforcement personnel and training.

#### II. Report

IUU fishing is a pervasive security threat to U.S. national interests. By undermining international agreements and fisheries conservation measures, IUU fishing jeopardizes global food security, with pronounced destabilizing effects on vulnerable coastal countries. IUU fishing robs legal fishers of their livelihoods, endangering the economic security of all nations with a maritime boundary. Industrial-scale fishing vessels deployed by irresponsible and aggressive flag states can increase geopolitical tensions, affecting the rights of nations to exercise their sovereignty and to benefit from their economic resources. A lack of accountability by these flag states to exercise responsible maritime governance over their fleets further enables illegal fishing actors to violate international rules-based order and foments transnational criminal organizations to use profits from IUU fishing to invest in other illicit activities. Finally, IUU fishing enables illicit actors in the seafood industry to facilitate forced labor and human trafficking. The White House's *National Security Memorandum on Combatting Illegal, Unreported, and Unregulated Fishing and Associated Human Rights Abuses* (June 27, 2022) found that "IUU fishing often involves forced labor, a form of human trafficking, and other crimes and human rights abuses." <sup>1</sup>

#### **IUU Fishing Strategic Outlook and Implementation Plan**

The *Illegal, Unreported, and Unregulated Fishing Strategic Outlook*, published in September of 2020 (Appendix B), announced the Coast Guard's commitment to leading a global effort to combat the illegal exploitation of the ocean's fish stocks and to protect our national interests. This document established three lines of effort critical to achieving success: (1) promote targeted, effective, intelligence-driven enforcement operations; (2) counter predatory and irresponsible State behavior; and (3) expand multilateral fisheries enforcement cooperation. The Coast Guard is working with intergovernmental and international partners to galvanize a coalition to confront coercive and antagonistic activity and to uphold shared peaceful and humanitarian values. Working collaboratively, the Coast Guard will expand a network of likeminded partners, will bring light to the shadows where IUU fishing exists worldwide, and ultimately, will strengthen global maritime security, regional stability, and economic prosperity.

The *Illegal, Unreported, and Unregulated Fishing Strategic Outlook Implementation Plan*, published in July of 2021 (Appendix C), is the Coast Guard's long-term vision to lead counter-IUU fishing efforts, directly contributing to broader U.S. policy goals outlined in the Interim National Security and National Military Strategies.

#### **Coast Guard IUU Capacity Building**

To support organizational commitment to combat IUU fishing, Coast Guard IUU capacity-building efforts developed new positions and expanded maritime domain awareness capabilities to meet the most urgent resource requirements. IUU fishing program managers, training instructors, and operational planners support increases in global engagements and streamline information-sharing with our interagency and international partners. Investment in a maritime domain awareness tool will serve to increase monitoring, collection of enforcement-quality data and intelligence, and real-time response by surface-based enforcement assets.

<sup>1</sup> <u>Memorandum on Combating Illegal, Unreported, and Unregulated Fishing and Associated Labor Abuses - The</u> White House.

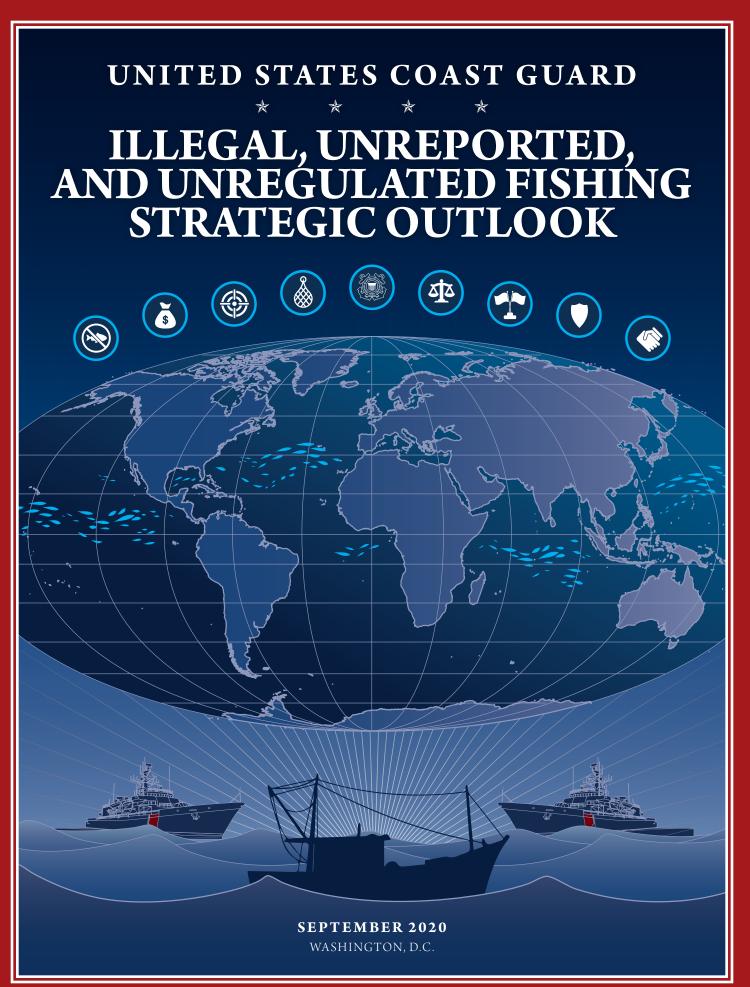
#### III. Conclusion

IUU fishing threatens U.S. national and regional security, exacerbates existing gaps in maritime governance, and affects core policy concerns of economic stability as a result of global employment sector losses of \$23.5 billion every year. Furthermore, the connection between IUU fishing and forced labor and human trafficking undermines the U.S. commitment to human rights and fair trade. The Coast Guard is leading a whole-of-government approach to combat IUU fishing, to advance national interests in the maritime domain, and to promote economic prosperity. The Coast Guard's Illegal, Unreported, and Unregulated Fishing Strategic Outlook and Implementation Plan provide the framework to leverage Coast Guard authorities and capabilities to protect sovereignty, to support cooperative enforcement of international laws, and to advance stability, security, and order in the maritime domain. As co-chair for the Maritime Security and Fisheries Enforcement (SAFE) Act, the Coast Guard serves to combat IUU fishing globally by identifying, interdicting, investigating, prosecuting, and dismantling IUU fishing operations and organizations perpetrating and knowingly benefitting from IUU fishing. The Maritime SAFE Act outlines the U.S. Government approach to apply broad authorities, capabilities, capacities, and partnerships in the fight against IUU fishing. It is the responsibility of all nations to deter and prevent IUU fishing activity within their capacity and capability, to include legal frameworks consistent with international obligations, particularly for vessels under their own flag. The Coast Guard seeks maritime governance, environmental stewardship, and the safe flow of maritime commerce, consistent with the international rules-based order.

## Appendix A: Abbreviations

Abbreviation	Definition
IUU	Illegal, Unreported, and Unregulated
SAFE Act	(Maritime) Security and Fisheries Enforcement Act

## Appendix B: IUU Fishing Strategic Outlook



\* \* \* \*

# THE UNITED STATES COAST GUARD'S

# VISION

TO COMBAT
IUU FISHING

\* \* \* \*

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# THE COMMANDANT OF THE UNITED STATES COAST GUARD



At-sea enforcement of the Nation's living marine resource laws is an enduring U.S. Coast Guard mission. Working with our partners in the National Oceanic and Atmospheric Administration, our enforcement efforts have upheld the biological and economic sustainability of our Nation's marine fisheries. The benefits of this mission abound: fishermen's livelihoods are protected, ports in which catch is distributed remain economically robust, and U.S. seafood consumers are able to support an industry dedicated to the long-term sustainability of U.S. fisheries.

Yet not all maritime nations have the capability to surveil their sovereign waters or the moral conscience to police their fleets; this lack of shared responsibility creates opportunities for exploitation in the form of <u>Illegal</u>, <u>Unreported</u>, <u>and Unregulated (IUU) fishing</u>. This exploitation erodes both regional and national security, undermines maritime rules-based order, jeopardizes food access and availability, and destroys legitimate economies.

IUU fishing has replaced piracy as the leading global maritime security threat. If IUU fishing continues unchecked, we can expect deterioration of fragile coastal States and increased tension among foreign-fishing Nations, threatening geo-political stability around the world.

The 2017 United States National Security Strategy outlines the impacts of these global threats, highlighting the importance of the rule of law, respect for sovereignty, and freedom of the seas to ensure the security of the United States and like-minded partners. This IUU Fishing Strategic Outlook announces the U.S. Coast Guard's commitment to leading a global effort to combat illegal exploitation of the ocean's fish stocks and protect our national interests. This Outlook establishes three lines of effort critical to achieving success: (1) Promote targeted, effective, intelligence-driven enforcement operations, (2) Counter predatory and irresponsible State behavior, and (3) Expand multilateral fisheries enforcement cooperation.

The U.S Coast Guard is prepared to take an enhanced leadership role in this effort, but we will not be successful alone. Playing to our strengths of working with intergovernmental and international partners, we seek to galvanize a coalition to confront coercive and antagonistic activity together and uphold our shared peaceful and humanitarian values. We know such international cooperation works: for 25 years, the six nations which contribute to the enforcement efforts of Operation North Pacific Guard have confronted illegal high seas driftnet fishing operations. Our collective efforts have been overwhelmingly successful in nearly eliminating illegal high seas driftnet fishing in the North Pacific Ocean.

Working collaboratively, we will expand a network of like-minded partners and bring light to the shadows where IUU fishing exists worldwide. Together, we will strengthen global maritime security, regional stability, and economic prosperity.

Semper Paratus.

Admiral Karl L. Schultz

### ILLEGAL, UNREPORTED, AND UNREGULATED FISHING **STATISTICS**

Illegal, Unreported, and Unregulated (IUU) fishing is a pervasive, far-reaching security threat.

#### 1 in 5 fish

Caught around the world is thought to have originated from IUU fishing. $^1$ 











#### GLOBAL IMPACTS OF IUU FISHING

#### 3.3 billion

People, nearly half the world's population, rely on fish for 20% of their animal protein.<sup>2</sup> IUU fishing removes access to this valuable protein source, particularly to the most vulnerable coastal States.

#### \$401 billion

First sale value of global fish production in 2018.2 IUU Fishing results in tens of billions of dollars of lost revenue to legal fishers every year.

#### 93%

Of the world's major marine fish stocks are classified as fully exploited, overexploited, or significantly depleted.2 IUU fishing undermines the sustainable management of these resources, pushing them to the limits of their capacity.







#### DOMESTIC IMPACTS OF IUU FISHING

80%

Of fish eaten in the U.S. are imported.<sup>1</sup> Without effective traceability and monitoring, illegally caught fish around the world can enter the U.S. market.



#### \$5.6 billion

Value of U.S. commercial fisheries in 2018. When IUU fish enter the marketplace, legal U.S. fishers are disadvantaged.<sup>3</sup>

- National Oceanic and Atmospheric Administration. (2020). Fishwatch: U.S. Seafood Facts. Retrieved from www.fishwatch.gov/ sustainable-seafood/the-global-picture
- 2 Food and Agriculture Organization of the United Nations. (2020). The State of World Fisheries and Aquaculture. Rome. doi:10.4060/ca9229en
- 3 National Oceanic and Atmospheric Administration. (2020, February 21). Fisheries of the United States, 2018. Retrieved from NOAA Fisheries: www.fisheries.noaa.gov/feature-story/fisheries-united-states-2018

## I.

## **Executive Summary**

Illegal, Unreported, and Unregulated (IUU) fishing is a pervasive security threat to U.S. national interests. By undermining international agreements and fisheries conservation measures, IUU fishing jeopardizes global food security, with pronounced destabilizing effects on vulnerable coastal States. IUU fishing robs legal fishers of their livelihoods, endangering the economic security of all nations with a maritime boundary. Industrial scale fishing vessels deployed by irresponsible and aggressive flag States can increase geo-political tensions, undermining the rights of nations to exercise their sovereignty and benefit from their economic resources. A lack of accountability by these flag States to enforce responsible maritime behavior on their fleets further enables illegal fishing actors to violate international rules-based order and opens the door to transnational criminal organizations to use profits from IUU fishing to monetize a suite of other illegal activities.

It is the responsibility of all nations to deter IUU fishing activity within their capacity and capability, particularly vessels under their own flag. The U.S. Coast Guard has always sought to ensure safety, security, and stewardship at sea. Under this IUU Fishing Strategic Outlook, the U.S. Coast Guard will apply our broad authorities, capabilities, capacities, and partnerships to be a global leader in the fight against IUU fishing. Working with partners in the National Oceanic and Atmospheric Administration (NOAA), the Department of State (DOS), and the Department of Defense (DOD), the U.S. Coast Guard will uphold a whole-of-government effort to advance national interests in the maritime domain and promote economic prosperity. Through enhanced engagement with like-minded nations and key maritime stakeholders, the U.S. Coast Guard is ready to spearhead the global fight against IUU fishing. We will do so by pursuing the following Lines of Effort:

**Promote Targeted, Effective, Intelligence-Driven Enforcement Operations.** The U.S. Coast Guard will lead global efforts to detect and deter IUU fishing on the high seas and in the exclusive economic zones (EEZs) of partner nations. Through the innovative use of intelligence, technology, data analysis, and information sharing, we will identify, target, and interdict illicit actors in the maritime domain in order to disrupt corrupt cycles of influence that enable illegal operations.

**Counter Predatory and Irresponsible State Behavior.** The U.S. Coast Guard will prioritize operations and engagement in areas where our efforts are most critical to demonstrate U.S. commitment and model responsible behavior. The U.S. Coast Guard will shine a light on the activities of those who violate international rules-based order, exposing and holding accountable the most egregious predatory actors.

**Expand Multilateral Fisheries Enforcement Cooperation.** The U.S. Coast Guard will build and maintain lasting cooperation with key partners to empower regional resource conservation and management. Working with U.S. and international partners, the U.S. Coast Guard will assist at-risk coastal States and like-minded nations to develop and maintain their own robust counter-IUU fishing capacity, bolstering their governance and enforcement systems and affirming the United States as a preferred partner. Through targeted, persistent, and collaborative efforts, we will sustain and strengthen connections with partner nations supporting international oceans governance.

#### IUU FISHING, EXPLAINED

IUU fishing is a collection of dishonest fishing practices, both on the high seas and in areas within national jurisdiction. IUU fishing includes fishing that is:

- Illegal in contravention of existing laws and regulations;
- Unreported not reported or misreported; and/or
- Unregulated executed by vessels without nationality and/or conducted in areas where the flag State is not a party to international agreements or in areas where fishery management measures do not exist.



## II.

## Today's Realities

Healthy fish stocks underpin the food security of coastal communities, maritime regions, and entire nation-states. The sustainable harvest of these resources is directly linked to economic security – both for the United States and for nations around the globe, many of whom rely on revenue from fish for substantial portions of their gross domestic product. However, today the world's fish stocks are under stress not only from growing consumption demand and changing ecosystems, but also from deliberate efforts to exploit gaps in existing governance structures. Illegal transshipment operations, heavily-subsidized distant water fishing fleets, and nations who choose to systematically engage in IUU fishing amplify these stressors and catalyze additional criminal activity which further undermines maritime rules-based order. This cycle of destabilization has global reach, threatening the national security of countries worldwide.

With today's interconnected fisheries and seafood markets, combating IUU fishing requires coordinated global action. The United States, as both a major consumer and a major producer of seafood products, must continue to lead efforts to neutralize the IUU fishing threat.



#### IUU Fishing - A Pervasive Security, Economic, and Environmental Threat

The opaque nature of IUU fishing makes it difficult to quantify its full economic impact. According to the United Nations Food and Agriculture Organization (FAO), between 11 and 26 million metric tons of fish are caught illegally each year. By avoiding the operational costs associated with sustainable fishing practices, fishers, companies, and nations that engage in IUU fishing receive economic benefit over legitimate actors by exceeding harvesting limits and disregarding other conservation and management measures. As a result, law-abiding U.S. fishers and seafood



industries are disadvantaged when illegally caught products enter the marketplace.<sup>4</sup> Globally, economic losses from IUU fishing are difficult to quantify, but there is little disagreement that it is in the billions, or even tens of billions, of U.S. dollars each year, disproportionally impacting some of the poorest countries in the world.

IUU fishing practices not only undermine the economic prosperity of lawful fishers today; they also rob future

<sup>4</sup> National Oceanic and Atmospheric Administration. (2015). *Action Plan for Implementing the Task Force Recommendations*. Presidential Task Force on Combatting IUU Fishing and Seafood Fraud. Retrieved from www.iuufishing.noaa.gov/Portals/33/noaa\_taskforce\_report\_final.pdf





generations of fishers of their livelihood by putting fish stocks at greater risk of collapse. IUU fishing erodes the validity of rules and arrangements made through Regional Fisheries Management Organizations (RFMOs) and other international forums that seek to sustainably and equitably manage fish harvests among member nations. Undocumented harvests from IUU fishing weaken these legitimate agreements and place undue strain on important fish stocks. Illegal fishing methods and gear used by IUU fishing perpetrators can also destroy habitats and result in excessive and wasteful bycatch. These practices destroy not only the resource today, but also its ability to be sustainably harvested for years and decades to come. Left without alternatives, these conditions entice more and more fishers to seek alternative sources of income such as piracy, drug trafficking, and human trafficking, creating a dangerous downward cycle furthering regional instability.



Today, the fight against IUU fishing is not just an economic or conservation mission, but one of strategic national importance. IUU fishing fundamentally erodes port and maritime security and exacerbates existing gaps in maritime governance. Criminal elements frequently use similar trade routes, landing sites, and vessels for trafficking arms, migrants, drugs, and other contraband. Maritime disorder created by IUU fishing also has global reach, as rival states are increasingly using resource extraction as an instrument of national power.

Systemic disregard of IUU fishing normalizes illegal behavior and erodes governance structures that foster peace and stability. In these ways, IUU fishing is a destabilizing threat to our collective global security and prosperity.

<sup>5</sup> Department of State. (2019). *Illegal, Unreported and Unregulated Fishing*. Office of Marine Conservation. Retrieved from www.state.gov/key-topics-of-fice-of-marine-conservation/illegal-unreported-and-unregulated-fishing/

"Systemic disregard of IUU fishing normalizes illegal behavior and erodes governance structures that foster peace and stability."

#### Illegal and Unreported Transshipment

Transshipment involves the transfer of catch from a fishing vessel to a refrigerated cargo vessel, or reefer, far from port. Legal transshipment provides important benefits to the fishing industry by consolidating fuel costs, moving product into the global market more efficiently, and providing a mechanism for resupplying fishing vessels at sea. Illegal and unreported at sea transshipment enables a significant portion of IUU fishing activity worldwide by obscuring the actual source of fish catches and providing a pathway for illegally caught fish to enter the global seafood market. Illegal and unreported transshipments not only amplify existing challenges with traceability and transparency in this complex industry, they have also been linked to human trafficking and can allow vessel captains to keep their crews at sea nearly indefinitely, in some cases resulting in de facto slavery. Globally, transshipment management rules vary widely with uneven levels of both oversight and enforcement. Publicly available documentation from authorities can also be difficult to access. Of the 17 RFMOs with convention waters covering the high seas, only one has a full ban on transshipment activity while five have implemented partial bans. Likewise, only 13 RFMOs have mandated some form of vessel tracking and just 10 have carriage requirements for an onboard observer.



#### **Distant Water Fishing Fleets**

Distant Water Fishing (DWF) fleets, which conduct fishing activities on an industrial scale in waters far from their home countries, have been closely associated with IUU fishing. These vessels, owned both by individuals and corporate entities, are often subject to weak, negligent, or intentionally complicit management by their flag States. Many DWF fleets are heavily subsidized by their home governments, which can diminish true fishing costs and incentivize unsustainable fishing practices. Predator states can also use DWF fleets to exploit gaps between governance structures and operate in areas where there is little or no effective enforcement presence, deliberately undermining maritime rules-based order.

Some governments have demonstrated a lack of political will to fully acknowledge and address IUU fishing problems in their DWF fleets, selfishly placing their own steady supply of fish above preserving the marine ecosystems, food supplies, and economic stability of other nations. A 2019 Stimson Center research study found that in the past several decades, the practice of DWF has expanded in size and reach across the ocean and around the world. DWF is heavily dominated by just five fleets, which make up 90% of global effort. China and Taiwan represented nearly 60% of all global distant water fishing effort in other countries' waters from 2015 to 2017. Japan, South Korea, and Spain's DWF fleets each represented 10%. (The U.S. DWF fleet was the sixth largest and amounted to 1.4% of the global effort.<sup>6</sup>) The international community, DWF states, coastal nations, and the fishing industry must collectively improve transparency and accountability for DWF fleets while taking necessary steps to safeguard global fisheries for future generations.<sup>7</sup>

#### **CONCERNS WITH CHINA'S FISHING PRACTICES**

The People's Republic of China has the largest distant water fishing fleet in the world. NOAA's 2019 biennial IUU Fishing Report to Congress<sup>8</sup> identified a troubling expanse of alleged violations by Chinese-flagged fishing vessels, describing multiple instances where they have been found illegally fishing in the EEZs of coastal states around the globe, from the Western and Central Pacific to the coasts of Africa and South America. The 2019 Report also raised concerns over the

number of stateless fishing vessels in the Northern Pacific displaying characteristics of Chinese registration. Additionally, the People's Armed Forces Maritime

Militia, estimated to include more than 3,000 vessels, actively carries out aggressive behavior on the high seas and in sovereign waters of other nations to coerce and intimidate legitimate fishers in support of the Chinese Communist Party's long term maritime strategic goals.

China must exercise more responsible flag state control over its vessels, including its DWF, and demonstrate that it is taking the necessary steps to ensure compliance with international norms and governance structures. Sovereign nations must be allowed to benefit from their own economic resources. Disregard for this sovereignty and territorial integrity by Chinese and other IUU fishing perpetrators not only threatens the stability of nations who rely on marine resources for food security and economic development, it is a direct violation of international rules based order.

<sup>6</sup> Stimson Center. (2019). The Implications of Distant Water Fishing Fleets. Retrieved from www.stimson.org/2019/implications-distant-water-fishing-fleets/

<sup>7</sup> Stimson Center. (2018). Casting a Wider Net: The Security Implications of Illegal, Unreported, Unregulated Fishing. Retrieved from www.stimson.org/2018/casting-wider-net-security-implications-illegal-unreported-and-unregulated-fishing

<sup>8</sup> NOAA Fisheries. (2019). *Improving International Fisheries Management*. Retrieved from www.fisheries.noaa.gov/foreign/international-affairs/identification-iuu-fishing-activities

#### Flags of Convenience

For decades, corrupt vessel owners have used Flags of Convenience to circumvent laws, taxes, and maritime safety standards. Instead of flying the flag of the vessel owner's home state, owners who use Flags of Convenience frequently register their ships in a country with an 'open registry'. Many countries with open registries have substandard policies for equipment safety, fair labor, taxation, safe navigation, environmental protection, and law enforcement. In this way, Flags of Convenience provide substantial loopholes for dishonest operators, and economic advantage to owners seeking to avoid the cost of regulatory compliance in their home country. Transnational criminal organizations also use Flags of Convenience to avoid international fisheries laws and agreements, frequently fishing over and above official quotas assigned to their registry nation.

#### **IUU Fishing & Associated Criminal Activity**

The impact of IUU fishing on an industrial scale can result in poor socio-economic conditions of fishers and fishing communities, making them increasingly vulnerable to transnational organized crime and other forms of criminal activity. The vulnerabilities result from a general lack of governance and rules-based order; including a lack of at-sea surveillance, a lack of transparency of beneficial vessel ownership and international records, and a lack of ability and/or willingness of certain flag States to enforce their criminal jurisdiction. Fishers are often recruited by organized criminal groups due to their skills and knowledge of the sea, and fishing vessels have been used for the purpose of smuggling migrants, conveying illegal drugs (or providing support to drug-laden vessels), illicit trafficking in weapons, and acts of terrorism.

"The vulnerabilities result from a general lack of governance and rules-based order; including a lack of at-sea surveillance..."

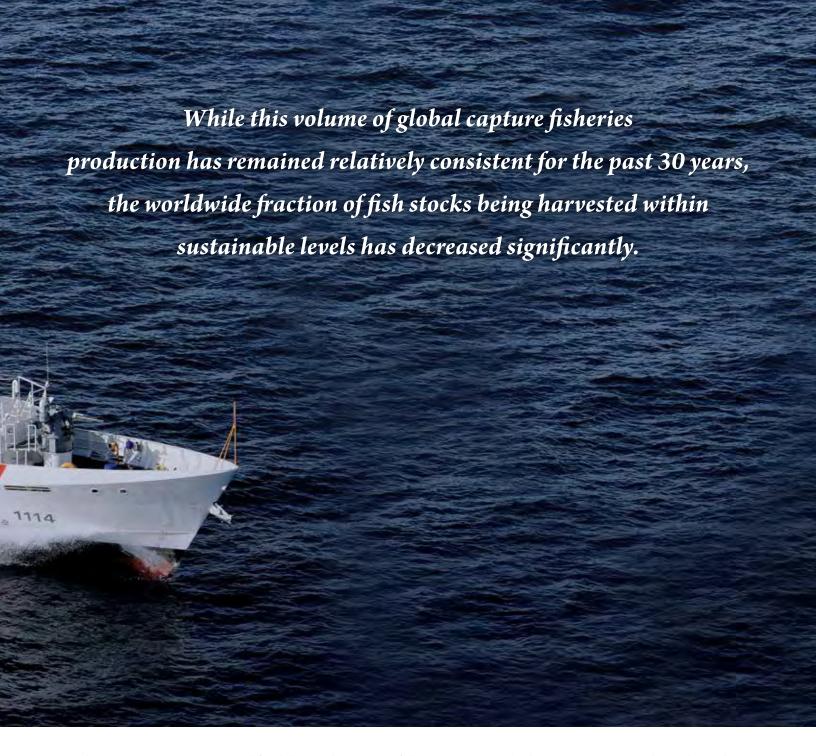




#### **Status of Global Fish Stocks**

Today, fish stocks are under severe pressure. The 2020 FAO State of the World Fisheries and Aquaculture estimated that 96 million metric tons of fish were harvested in 2018. While this volume of global capture fisheries production has remained relatively consistent for the past 30 years, the worldwide fraction of fish stocks being harvested within sustainable levels has decreased significantly. Today, 93% of the world's major marine fish stocks are classified as either fully exploited, overexploited, or significantly depleted.

Stress on fish stocks is partially caused by a rise in demand. Since 1961, the average annual increase in global food fish consumption (3.1%) has outpaced population growth (1.6%). In 2018, fish consumption was second only to poultry in global meat consumption—exceeding the consumption of meat from all other terrestrial animals combined. World fish consumption is expected to continue to increase, reaching a total volume of 201 million tons of fish by 2030. As the



population continues to grow and food demand increases, fishing pressure on high seas, migratory, and transboundary fish stocks in particular will continue to intensify.

Changes in global ocean conditions are also expected to affect total fish catch potential over the next decade. Projections of the degree of impact vary geographically. In the Arctic Region, changing ice conditions are enabling expanded economic activity, including commercial fisheries, in areas where they had not previously been possible. Fish stocks are expected to continue to shift northward, creating potential enforcement challenges to the current international prohibition on Arctic fishing. In tropical regions - where many countries are highly fisheries-dependent - more negative impacts to fish stock distributions are predicted over the coming decades. Countries vary widely in their national capacity to adapt to changes in where and how they collect their catch. Without the ability of industry to alter fishing practices and locations, and the ability of governments to support this transition, nations will be further challenged in their quest to secure food and livelihood for their citizens.

# III.

# **U.S. Coast Guard's Enduring Role in Combatting IUU Fishing**



The U.S. Coast Guard has been the lead agency in the United States for at-sea enforcement of living marine resource laws for more than 150 years. As the only agency with the infrastructure and authority to project a law enforcement presence throughout the 3.36 million square mile U.S. EEZ and in key areas of the high seas, the U.S. Coast Guard is uniquely positioned to combat IUU fishing and uphold the rule of law at sea.



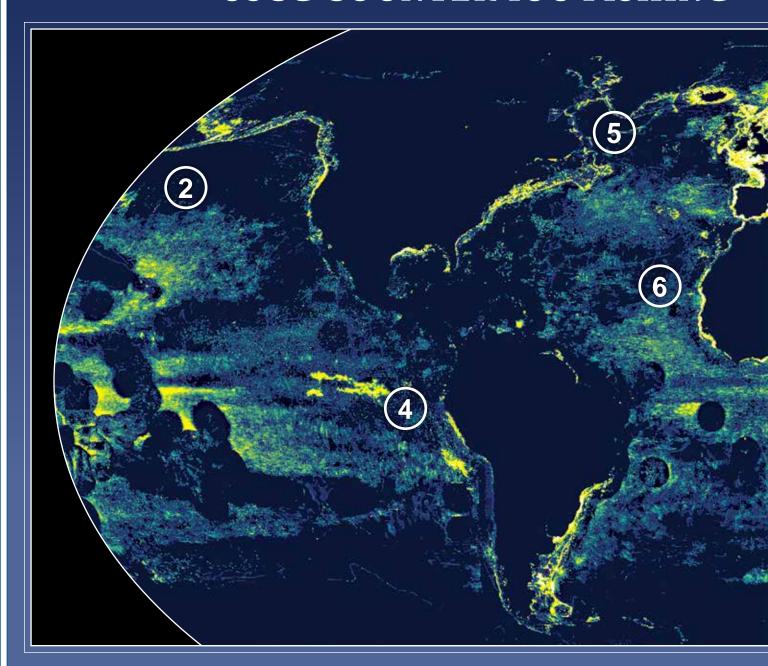
Ocean Guardian, the U.S. Coast Guard's Fisheries Enforcement Strategic Plan, has guided effective and professional at-sea enforcement for decades to advance national goals for the conservation and management of living marine resources and their environment. Ocean Guardian focuses the U.S. Coast Guard's efforts on three strategic priorities: protect the U.S. EEZ from foreign encroachment, enforce domestic living marine resource laws, and ensure compliance with international agreements. This Strategic Outlook complements Ocean Guardian by articulating the global reach of the IUU fishing problem, its threat to national security, and the U.S. Coast Guard's role in combatting it. It provides a holistic U.S. Coast Guard approach to combatting IUU fishing, incorporating not only at-sea enforcement, but also vital operations ashore to include intelligence targeting and information sharing, legal support, and policy development necessary to inform operations and advance United States priorities that uphold rules-based order in the maritime domain.



Today, the world's oceans require a global approach to preserve territorial integrity and international norms, maintain an unimpeded flow of commerce, and uphold freedom of use and access to shared resources. U.S. Coast Guard efforts to counter IUU fishing contribute directly to broader efforts in the National Security and National Defense Strategies to ensure rules-based order is upheld in the maritime domain. These same efforts also uphold free and open systems of governance that enable legal access to fisheries. In the face of increasing challenges to global food security and the growing demand for marine resources, the U.S. Coast Guard will advance global efforts to confront IUU fishing to preserve the long-term strategic and economic viability of global fish stocks.



#### **USCG COUNTER-IUU FISHING**



#### Pacific Quadrilateral Defense **Coordination Group:**

Indo-Pacific Command representative to the Quadrilateral Defense Coordination Group (QUAD), a collaborative effort by defense and security agencies from Australia, France, New Zealand and the United States to develop multilateral approaches to enhance maritime security in the South Pacific. Cooperation through the QUAD has been critical to the advancement of rules-based order in Oceania.

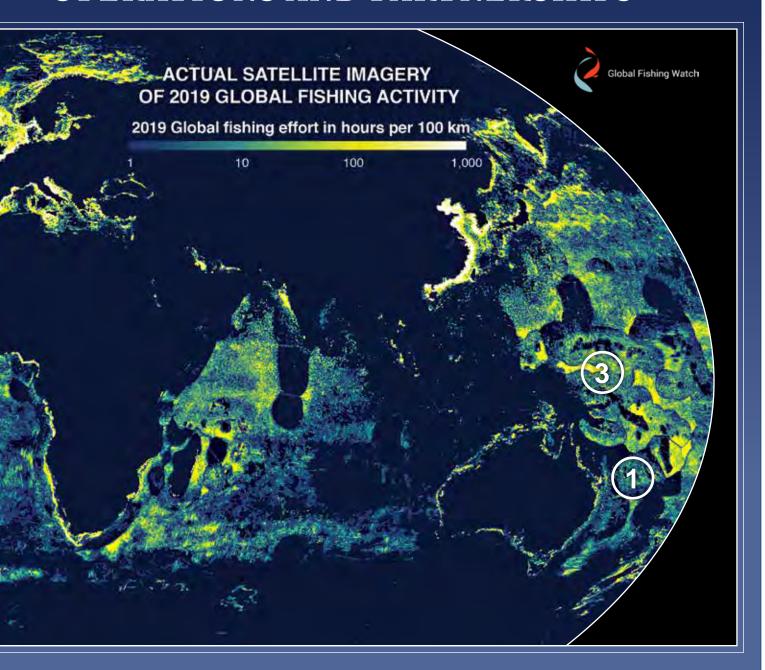
#### Operation North Pacific Guard:

The U.S. Coast Guard serves as the U.S. For over 25 years, the U.S. Coast Guard has been at the forefront of combating IUU fishing through Operation North Pacific Guard, a multinational enforcement operation in partnership with Canada, Japan, South Korea, Russia and China. Originally executed to detect and interdict vessels deploying illegal high seas driftnets, the operation has evolved to tackle all IUU fishing threats in the North Pacific Ocean.

#### Pacific Island Bilateral Enforcement Agreements:

The U.S. Coast Guard partners with Pacific Island Nations through bilateral enforcement agreements, also known as shiprider agreements. These agreements allow partner nations to enforce their own domestic laws alongside a U.S. Coast Guard vessel or boarding team and, in doing so, support the development of partner nation capabilities in combating IUU fishing and sovereignty protection.

#### **OPERATIONS AND PARTNERSHIPS**



## 4 Enduring Partners Meeting New Threats:

The U.S. Coast Guard has long part nered with the U.S. Southern Command and Joint Interagency Task Force South to combat illegal drug smuggling in the Eastern Pacific region. As the IUU fishing threat expands the U.S. Coast Guard and DOD continue to cooperate with regional partners like the Republic of Ecuador to fight against illegal fishing and foster stability in the region.

### 5 U.S. / Canada Bilateral Cooperation:

The United States has a long, steadfast partnership with Canada to sustainably manage transboundary fisheries like salmon and tuna. Canada continues to be a leading partner in fisheries en forcement and is committed to increasing their resource investments in intel ligence-driven enforcement operations (like Operation North Pacific Guard) and joint U.S./Canadian enforcement patrols in support of the North Atlantic Fisheries Organization.

## 6 Africa Maritime Law Enforcement Partnership:

The U.S. Coast Guard, in cooperation with U.S. Africa Command, conducts training, exercises, and combined law enforcement operations as a part of the Africa Maritime Law Enforcement Part nership. These engagements promote regional stability, self-governance, and economic development in the territorial seas and exclusive economic zones of African partner nations.

# IV.

## Line of Effort 1: Promote Targeted, Effective, Intelligence-Driven Enforcement Operations

U.S. Coast Guard at-sea enforcement operations enhance maritime governance by detecting and deterring IUU fishing on the high seas. By documenting and reporting IUU fishing activity, U.S. Coast Guard efforts enliven the process for RFMOs and the international community to hold flag States accountable to address IUU fishing by their vessels. The U.S. Coast Guard will coordinate across the U.S. Government to target areas susceptible to IUU fishing and otherwise increase our law enforcement presence on the high seas and in the EEZs of partner nations



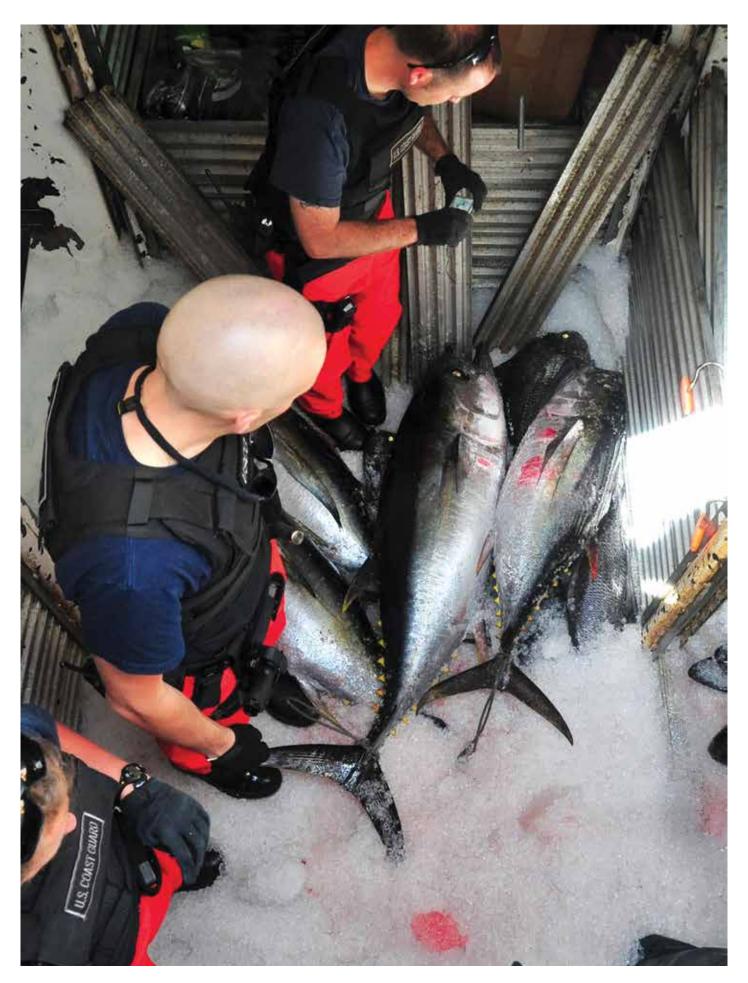


IUU fishing activities can be adaptable, highly mobile, and increasingly sophisticated as illicit actors attempt to find and exploit gaps and seams in international fisheries governance and enforcement systems. Vast ocean spaces and insufficient Maritime Domain Awareness create shadows where illicit actors thrive.

Effective counter-IUU fishing operations must also be supported by robust intelligence information in order to most effectively identify, target, and interdict illicit actors in the maritime domain. As a member of the Intelligence Community, the U.S. Coast Guard will enable, support, and inform counter-IUU fishing operations through the innovative use of intelligence, technology, data analysis, and information sharing. The U.S. Coast Guard will enhance our law enforcement presence and advance intelligence- and data-driven operations to target areas susceptible to IUU fishing by:

- Deploying tailored force packages that meet regional mission requirements;
- Leveraging Intelligence Community capabilities and innovative technology to analyze, consolidate, and share enforcement data to target illicit operators and flag States complicit in condoning illegal fishing activity;
- Streamlining processes for information sharing related to maritime enforcement and port security within the U.S. interagency and with foreign partners;
- Pushing intelligence information to the widest audience, prioritizing unclassified information in order to uncover vessel beneficial ownership, criminal organizations, and flag States that are actively undermining global fisheries management; and
- Training, developing, and maintaining robust counter-IUU fishing expertise throughout the U.S. Coast Guard workforce, including increasing the number of multi-mission personnel able to conduct counter IUU fishing enforcement as part of their assignment, to enable our own mission execution and support the building of partner nation capacity.





USCG ILLEGAL, UNREPORTED, AND UNREGULATED FISHING STRATEGIC OUTLOOK 27



# Line of Effort 2: Counter Predatory and Irresponsible State Behavior



Predatory State behavior is the intentional and aggressive violation of the sovereignty of other nations in pursuit of national objectives. Irresponsible State behavior is the willingness to defy maritime governance, and the failure to require vessels flying the State's flag to comply with international norms. Predatory and irresponsible nations that turn a blind eye to IUU fishing distort markets with aggressive economic policies, undermine free and open democracies, challenge security and prosperity, and destabilize at-risk nations around the globe. Predatory nations seek to expand the reaches of their own state-driven economic models and grow their power at the expense of the sovereignty of others.

The U.S. Coast Guard will confront the actions of predatory and irresponsible State actors by promoting partnerships with atrisk coastal States and like-minded nations. This will affirm the United States as a preferred partner while shining a light on the activities of those who violate international rules and norms. Deterring IUU fishing and disrupting corrupt cycles of influence that enable these illegal operations requires long-term commitment, persistent presence, and influence by legitimate authorities. The U.S. Coast Guard excels in bringing human-to-human partnerships to confront complex maritime challenges and is uniquely positioned to advance U.S. strategic objectives and combat the destabilizing forces of IUU fishing nations by:

- Targeting our operations and engagement in priority regions and countries;
- Confronting the actions of predatory and irresponsible nations and raising international community awareness of destabilizing influences that threaten vulnerable States;
- Leveraging existing resources, enforcement tools, and legal authorities to coordinate efforts alongside partner nations to combat IUU fishing and associated illegal trade, including weapons, drugs, and human trafficking; and
- Building partnerships with the private sector-including with universities; non-governmental organizations; nonprofit
  research organizations; the seafood industry; and the technology, transportation, and logistics sectors-to leverage new
  and existing technologies and data analytics to identify and address major IUU fishing trends and threats.



# Line of Effort 3: Expand Multilateral Fisheries Enforcement Cooperation

The United States is party to multiple international agreements for the management of transboundary and highly migratory fish stocks. As the primary U.S. agency responsible for monitoring at-sea compliance with these agreements, the U.S. Coast Guard must continue to work with international partners to collectively improve and uphold these agreements, including through joint operations with partners who possess robust, capable enforcement forces.



Gaps in U.S. and partner nation presence, combined with limited enforcement capacity and governance structures in at-risk coastal nations, create opportunities for predators to amplify their influence and undermine regional stability. Through targeted and persistent engagement, the U.S. Coast Guard will strengthen and build multi-lateral, multi-national coalitions of likeminded partners to combat IUU fishing.

Every flag and coastal State has a responsibility to help eradicate IUU fishing; however, not all States are equal in their capacity and capability. The U.S. Coast Guard is skilled at developing and implementing enforcement mechanisms and transferring that knowledge to willing partner nations. Working alongside like-minded, capable Nations, we will synchronize our collective efforts to train and bolster the counter-IUU fishing capacity and capability of willing partners to create a united front to combat IUU fishing in every ocean.



Together, we can disrupt and remove the economic drivers that promote IUU fishing and eradicate this threat to our collective prosperity. In turn, we will level the playing field for legal fishermen and operators worldwide by:

- Promoting the adoption of high seas boarding authorities in RFMOs that do not currently have them;
- Adding counter-IUU fishing to existing U.S. bilateral enforcement agreements and pursuing new agreements with flag States and countries in priority regions.
- Seeking increased operational commitments for at-sea enforcement presence from capable nations;
- Including counter-IUU fishing in annual at-sea exercises conducted with DOD and international partners;
- Creating partnerships similar to the Oceania Maritime Security Initiative and the Africa Maritime Law Enforcement Partnership in other priority regions;
- Providing targeted country and region-specific training on combating IUU fishing;
- Supporting improvements to key technologies and systems (including vessel tracking technologies and data sharing)
  in priority regions and priority flag States to enhance maritime enforcement and port security information sharing;
- Supporting increased effectiveness and transparency of the fisheries enforcement sectors of the governments of countries in priority regions; and
- Promoting the adoption of the Port State Measures Agreement<sup>9</sup> and helping priority States implement port security programs to prevent IUU fishing products from entering the global seafood market.





## VII.

### **Ensuring Long-Term Success**

In addition to the specific counter-IUU fishing strategic objectives, there are several enabling concepts that are critical for the U.S. Coast Guard to ensure long-term success:

**Unity of Effort:** The U.S. Coast Guard relies on close working relationships with Federal agencies, primarily NOAA and DOS, to bring a balanced, whole-of-government approach to promote economic prosperity and advance U.S. strategic objectives in the maritime domain. Additionally, as a military Service, the U.S. Coast Guard will strengthen interoperability with DOD and complement the capabilities of the other military services to support the National Security Strategy and the National Defense Strategy. Together with our interagency partners, the U.S. Coast Guard will collaborate with like-minded nations to uphold sovereignty and international law. This unity of effort will ensure U.S. Coast Guard priorities remain aligned with national goals and international governance systems that foster peace, access, and stability.



**Partnership:** The U.S. Coast Guard will actively support and enhance our engagement in multilateral organizations focused on maritime governance, such as RFMOs, as well as play a leadership role in the operationally-focused Regional Coast Guard Forums. The U.S. Coast Guard will continue to dedicate resources to cooperate with allies and partners, conducting combined operations and exercises to protect sovereign interests and advance national priorities. Our unique and valuable relationship with nations with which we have bilateral agreements builds mutual trust and improves mission capacity and readiness. We will continue to incorporate lessons-learned from engagements with our partners, as well as industry, academia, NGOs, and other stakeholders, in the development and implementation of our policy and strategy.

**Investment in the Future:** The U.S. Coast Guard will build a mission ready workforce of law enforcement professionals, mission managers, and legal and policy experts to guide counter-IUU fishing operations. This investment includes updating training and education programs to develop necessary skills and knowledge for mission needs within our workforce.

**Innovation:** The U.S. Coast Guard will strive to stay abreast of advancements in new technology to combat IUU fishing. We will continue to recapitalize aging assets, including cutters, boats, aircraft, and facilities. We will also invest in digital tools and information technology infrastructure to meet the challenges of maintaining maritime domain awareness and information sharing.





## VIII.

#### Conclusion

IUU fishing is a national security threat with destabilizing effects on vulnerable coastal States and world markets. To counter IUU fishing, we must work together to disrupt and remove the economic drivers that promote it. As the principal federal at sea law enforcement agency for more than 150 years, the U.S. Coast Guard will leverage our broad authorities and capabilities to promote and advance a whole of government effort to protect sovereignty, support cooperative enforcement of international laws, and advance stability, security, and order in the maritime domain.

This document provides a framework that outlines the U.S. Coast Guard's efforts over the next decade to combat the scourge of IUU fishing. It emphasizes three Lines of Effort:

#### Promote Targeted, Effective, Intelligence-Driven Enforcement Operations

The U.S. Coast Guard will enable, support, and inform counter-IUU fishing operations, including through the innovative use of intelligence, technology, data analysis, and information sharing in order to eliminate the shadows where illicit actors thrive. Through long term commitment as well as effective presence and influence, the U.S. Coast Guard will enhance maritime governance, detect and deter IUU fishing, and disrupt the corrupt cycle of influence that enables illegal fishing operations.

#### Counter Predatory and Irresponsible State Behavior

The U.S. Coast Guard will prioritize operations and engagement that solidify U.S. commitment and model responsible behavior, confront the deleterious actions of near peer competitors, and shine a light on the activities of those who violate the international rules based order in the maritime domain.

#### **Expand Multilateral Fisheries Enforcement Cooperation**

The U.S. Coast Guard will sustain and strengthen bilateral and multilateral partnerships with like minded, capable nations to maximize the impact of collective counter-IUU enforcement efforts and promote the rule of law. We will assist partner nations to develop and maintain their own robust counter-IUU fishing capacity and capability. Through cooperative en forcement and engagement, the U.S. Coast Guard will reinforce international fisheries governance and enforcement regimes, allow partner nations to protect their sovereignty, and reinforce the U.S. as a preferred partner.

#### **Way Ahead**

The peace and prosperity of the United States requires a capable, innovative, and effective U.S. Coast Guard to combat the destabilizing effects of IUU fishing. Ensuring the safety, security, and stewardship of the maritime domain is an enduring U.S. Coast Guard mission. The U.S. Coast Guard will continue to advance the rules based order on the world's oceans by exercising our broad authorities and capabilities to combat IUU fishing. By promoting a unified effort with federal partners, like minded nations, and international stakeholders; sparking innovation; and building a mission ready workforce; the U.S. Coast Guard will lead global efforts to strengthen and invigorate international fisheries enforcement regimes and stop IUU fishing's threats to the marine environment and maritime rules based order.





U.S. COAST GUARD HEADQUARTERS WASHINGTON, D.C.

FISHERIES ENFORCEMENT DIVISION CG-MLE-4 US COAST GUARD OFFICE OF LAW ENFORCEMENT

www.uscg.mil

Appendix C: IUU Fishing Strategic Outlook Implementation Plan



### IMPLEMENTATION PLAN

FOR THE U.S. COAST GUARD ILLEGAL, UNREPORTED, AND UNREGULATED (IUU) FISHING STRATEGIC OUTLOOK

\* \* \* \*

Illegal, Unreported, and Unregulated (IUU) fishing is a pervasive global maritime security threat. By undermining international agreements and fisheries conservation measures, IUU fishing jeopardizes food security and economic security, with pronounced destabilizing effects on vulnerable coastal States. If IUU fishing continues unchecked, we can expect increased tensions among foreign fishing nations, threatening geo-political stability around the world. This Implementation Plan outlines actions the U.S. Coast Guard will take to achieve our strategic objectives to combat illegal exploitation of the ocean's fish stocks, support good maritime governance, foster networks of domestic and international partnerships to protect our national interests, and advance rules-based order in the maritime domain.

Luca L Jogo

July 26, 2021

ADMIRAL LINDA L. FAGAN Vice Commandant, U.S. Coast Guard DATE



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## Overview

Countering IUU fishing is a rising U.S. Government priority. IUU fishing presents more than just a direct threat to the sustainable management of marine resources. IUU fishing represents a significant crack in the infrastructure of global norms and rules-based order that we have relied on for the last century. When supported as a de-facto state policy, IUU fishing enables the ravaging of global fisheries resources through gray-zone economic warfare. In the last three years, both the White House¹ and Congress² have recognized IUU fishing as a significant threat to U.S. national and regional security. In response, U.S. Government agencies have expanded collaborative domestic efforts and international partnerships to counter IUU fishing and practices that seek to undermine the rule of law.

"It is the policy of the United States... to take action to curtail the global trade in seafood and seafood products derived from IUU fishing, including its links to forced labor and transnational organized illegal activity..."

~ MARITIME SAFE ACT, DECEMBER 2019

As a major market, wild seafood producer, and exporter of fish and fish products, the United States has a particularly strong interest in combating IUU fishing to ensure illegally caught products do not unfairly compete in the marketplace with law-abiding fishers and seafood industries. We also recognize that many other nations around the globe are equally committed to ensuring sustainable resource management, upholding maritime safety and security, and respecting international norms on the high seas. Unfortunately, some nations do not act as responsible flag states by failing to patrol their sovereign waters, police their fleets, and apprehend and prosecute transgressors. This lack of shared responsibility creates opportunities for exploitation.

The *Illegal, Unreported, and Unregulated Fishing Strategic Outlook* is the U.S. Coast Guard's long-term vision to lead U.S. efforts to counter IUU fishing, contributing directly to broader efforts in the National Security and National Military Strategies to uphold free and open systems of governance. This Strategic Outlook provides the framework by which we will leverage our authorities and capabilities to promote a whole-of-government effort to protect sovereignty, support cooperative enforcement of international laws, and advance stability, security, and order in the maritime domain.

As the only U.S. Government agency with the infrastructure and authority to project a law enforcement presence throughout the 3.36 million square mile U.S. Exclusive Economic Zone (EEZ) and in key areas of the high seas, demand for U.S. Coast Guard services in this mission is growing. However, with this demand also comes tremendous opportunity. At-sea enforcement of living marine resources is an enduring U.S. Coast Guard mission, and we excel at forging human-to-human partnerships to create collaborative, durable networks. Working with partners in the National Oceanic and Atmospheric Administration (NOAA), the Department of State (DOS), the Department of Defense (DOD), and the U.S. Agency for International Development (USAID), among others, the U.S. Coast Guard will galvanize an international coalition to confront coercive and antagonistic activity head-on and uphold our shared peaceful and humanitarian values.

<sup>1</sup> Executive Order No. 13921, 85 Fed. Reg. 28471 (May 12, 2020).

<sup>2</sup> Maritime Security and Fisheries Enforcement (SAFE) Act, 16 U.S.C. § 8001 et seq.

<sup>2</sup> ILLEGAL, UNREPORTED, AND UNREGULATED FISHING STRATEGIC OUTLOOK IMPLEMENTATION PLAN

# UNITED STATES COAST GUARD ILLEGAL, UNREPORTED, AND UNREGULATED FISHING STRATEGIC OUTLOOK SEPTEMBER 2020 WASHINGTON, D.C.

USCG ILLEGAL, UNREPORTED, AND UNREGULATED FISHING STRATEGIC OUTLOOK 01

# Methodology

The Coast Guard Strategic Plan (2018 2022) establishes the U.S. Coast Guard's focus for the present and sets the Service's vision for the future. Strategic Outlooks, including the IUU Fishing Strategic Outlook, define the U.S. Coast Guard's long term strategic planning efforts for specific issues and establish an overall scope of operations related to each issue.

Implementation Plans describe how the U.S. Coast Guard intends to accomplish strategic objectives through specific initiatives. Each initiative provides context for budget requests, acquisitions and logistics, program management and milestones, and operational execution and performance targets.



COAST GUARD STRATEGIC PLAN 2018-2022



👺 U.S. Coast Guard



# Implementing the IUU Fishing Strategic Outlook

The IUU Fishing Strategic Outlook announced the U.S. Coast Guard's commitment to leading a global effort to combat illegal exploitation of the ocean's fish stocks and protect our national interests. The Strategic Outlook established three Lines of Effort (LOEs) that will guide the U.S. Coast Guard's actions to combat IUU fishing and, in the process, strengthen global maritime security, uphold regional stability, and promote economic prosperity.

LOE 1: Promote Targeted, Effective, Intelligence-Driven Enforcement Operations

**LOE 2:** Counter Predatory and Irresponsible State Behavior

**LOE 3:** Expand Multilateral Fisheries Enforcement Cooperation

This Implementation Plan presents ten Initiatives and supporting Actions that execute the *IUU* Fishing Strategic Outlook's LOEs to successfully address IUU fishing. These Initiatives and supporting Actions have been developed through a coordinated and broad analysis of current authorities, capabilities, and partnerships. Every Initiative is linked to a specific *IUU Fishing Strategic Outlook* 

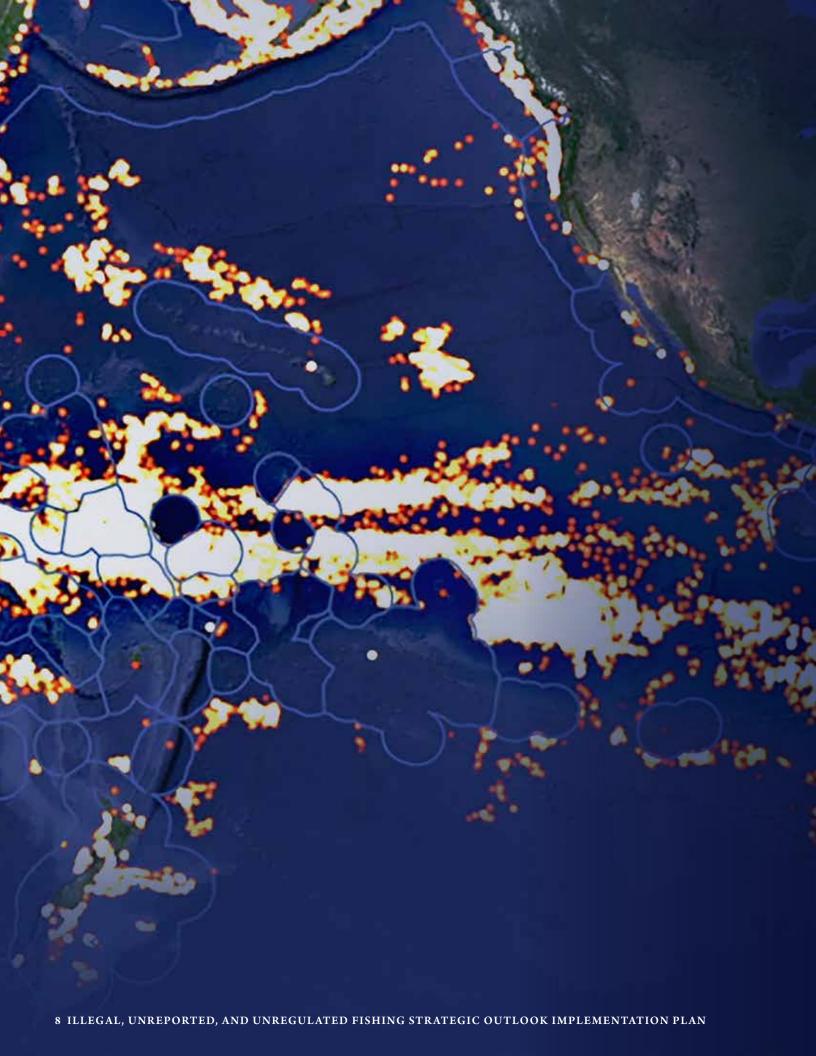


LOE. Actions listed within each Initiative represent the most pressing and crucial next steps to advance our counter-IUU fishing efforts. Each Initiative description also includes a lead office or unit responsible for overseeing the implementation of that Initiative.

- **Initiative 1:** Leverage Intelligence Capabilities (LOE 1, 2, and 3)
- **Initiative 2:** Enhance U.S. Coast Guard Operations (LOE 1 and 2)
- **Initiative 3:** Build and Strengthen Multilateral Coalitions (LOE 3)
- **Initiative 4:** Confront Predatory and Irresponsible Actions (LOE 1, 2, and 3)
- **Initiative 5:** Train Our People (*LOE 1*)
- Initiative 6: Build Partner Nation Capability (LOE 1 and 3)
- **Initiative 7:** Streamline Information Sharing (LOE 1, 2, and 3)
- **Initiative 8:** Communicate Strategically (LOE 2 and 3)
- Initiative 9: Implement Innovative Technology (LOE 2 and 3)
- **Initiative 10:** Measure Performance (LOE 1, 2, and 3)

This Implementation Plan will inform and guide the many ways in which the U.S. Coast Guard will fulfill the *IUU Fishing Strategic Outlook's* objectives over the coming decade. This Plan will be updated as necessary to maintain the U.S. Coast Guard's effectiveness in meeting the dynamic nature of the IUU fishing threat. This will require the development and application of robust performance measures that will enable the Service to respond to changing conditions.





#### **INITIATIVE 1:**

## Leverage Intelligence Capabilities

LEAD | U.S. Coast Guard Assistant Commandant for Intelligence (CG-2)

SUPPORTING | U.S. Coast Guard Investigative Service (CGIS), U.S. Coast Guard Atlantic Area, U.S. Coast Guard Pacific Area

Vast ocean spaces, impediments to swift information sharing, and gaps in maritime domain awareness create shadows in which IUU fishing perpetrators hide their activities. The U.S. Coast Guard will develop and em ploy robust intelligence capabilities and partnerships to identify the greatest threats, including irresponsible and predatory flag states, beneficial vessel owners, and criminal organizations, in order to reduce opportunities for IUU fishing to occur. We will regularly improve the sharing of classified information and press to declassify information to the greatest extent possible to promote enhanced distribution. Helping to ensure information is accessible to the widest audience will support our collective efforts to most effectively identify, target, and interdict nefarious actors in the maritime domain and within the seafood supply chain.

- 1. Enhance engagement with National Maritime Intelligence Integration Office (NMIO), the Intelligence Community (IC) maritime manager, and key stakeholders throughout the interagency to coordinate IC efforts and ensure IUU fishing remains an intelligence collection priority.
- 2 Incorporate U.S. Coast Guard Intelligence staffs into operations planning processes to develop and refine IUU intelligence collection requirements, prepare deploying assets to integrate intelligence collections into their planned operations, and provide deploying assets with updated trends and target lists to focus operations.
- 3. Enhance efforts to target specific IUU fishing networks and entities by leveraging the National Intel ligence Coordination Center's Coastwatch resources (within the U.S. Customs and Border Protection (CBP)'s National Targeting Center's Counter Networks Division) to conduct network analysis.
- 4. Coordinate with NMIO and IC partners to highlight vessels, flag states, beneficial owners, and criminal organizations in relevant intelligence collection and strategic analysis.
- 5. Evaluate current intelligence dissemination practices to identify missing audiences.
- 6. Following established policies and agreements, maximize information sharing with key stakeholders, including state and local governments, public/private partners, foreign partner nations, and non governmental (NGO) and international organizations.
- 7. Strengthen existing partnerships between CGIS and INTERPOL to detect and suppress IUU fishing along all points of the supply chain, including through intelligence driven organized crime investigations.

# **INITIATIVE 2:**

# Enhance U.S. Coast **Juard Operations**

LEAD | U.S. Coast Guard Atlantic Area, U.S. Coast Guard Pacific Area

SUPPORTING | U.S. Coast Guard Assistant Commandant for Response Policy (CG-DCO-I), U.S. Coast Guard Investigative Service (CGIS) (CG-5R), U.S. Coast Guard Director of International Affairs and Foreign Policy

ties, and improve operational effectiveness. the Service to reevaluate past and future operations in order to reinvigorate partnerships, enhance capabili-Guard. The growing demand for U.S. Coast Guard leadership and presence in this space, however, requires Conducting operations to deter, detect, and interdict IUU fishing is not a new mission for the U.S. Coast

- Develop Concepts of Operations for IUU fishing enforcement that incorporate comprehensive surface agencies and nations. air, intelligence, and law enforcement capabilities in lockstep with capabilities brought by partner
- Leverage regional subject matter expertise using innovative patrol planning and guidance to effectively and efficiently identify, track, and target IUU fishing actors.
- $\dot{\omega}$ Develop new Tactics, Techniques, and Procedures and force packages to efficiently utilize the Heritage class and Polar Security Cutters as they become operational. increased capabilities of the Sentinel, Legend, and Seagoing Buoy Tender class cutters. Incorporate
- Optimally resource counter-IUU fishing missions by increasing their priority within the Global Force Management Board and Strategic Planning Direction asset allocation processes
- S through information sharing and development of tailored force packages. Enhance cooperation and operational planning with DOD Combatant Commanders, including
- 6 maintain networks between U.S. Coast Guard operational planners and key partners Establish annual, international, regionally based fisheries law enforcement symposiums
- and inspection program in both the South Pacific and Atlantic Oceans. operations, including operationalizing the 1995 U.N. Fish Stocks Agreement high seas boarding Seek opportunities to expand authorities that permit U.S. Coast Guard at-sea enforcement
- Continue to participate in worldwide IUU fishing operations led by INTERPOL aimed at countering predatory and irresponsible state behavior.





#### **INITIATIVE 3:**

# **Build and Strengthen Multilateral Coalitions**

LEAD | U.S. Coast Guard Atlantic Area, U.S. Coast Guard Pacific Area

SUPPORTING | U.S. Coast Guard Assistant Commandant for Response Policy (CG-5R), U.S. Coast Guard Director of International Affairs and Foreign Policy (CG-DCO-I), U.S. Coast Guard Investigative Service (CGIS)

IUU fishing is the leading global maritime security threat, and as such, requires a coordinated global maritime response. The U.S. Coast Guard is prepared to enhance its leadership role to unite a network of partners who similarly seek to safeguard regional stability and peace. Together, we can eradicate IUU fishing by bringing light to the shadows where it exists.

- 1. Support the U.S. Interagency Working Group for IUU Fishing, created by the Maritime SAFE Act, including through the development of the U.S. Five Year Strategic Plan as well as with targeted efforts to identify priority flag states and regions for engagement (as defined by the Maritime SAFE Act)<sup>3</sup>.
- 2. Seek commitments from international partners to increase at-sea enforcement presence in high priority operational areas to deter and take enforcement action against IUU fishing perpetrators.
- 3. Add counter-IUU fishing to existing bilateral law enforcement agreements and pursue new bilateral agreements with priority flag states. Endeavor to exercise every bilateral agreement annually.
- 4. In coordination with DOD, create and regularly exercise partnerships similar to the existing Oceania Maritime Security Initiative and Africa Maritime Law Enforcement Partnership in other priority regions to encourage counter-IUU fishing operations and coordinated enforcement patrols.
- 5. Continue to support DOS, USAID, and other intergovernmental partners through development and execution of international training and exercises that increase partner nation capability to improve their fisheries governance schemes and better enforce their own sovereignty.
- 6. Rigorously exercise Regional Fisheries Management Organizations (RFMOs) High Seas Boarding and Inspection authorities and engage with RFMOs to promote adoption of high seas boarding and inspection schemes where they do not currently exist.
- 7. Build and strengthen partnerships with NGOs and private organizations advancing the counter-IUU fishing effort in priority regions and flag states.
- 8. Continue to serve on the board of the INTERPOL Fisheries Crime Working Group, promoting cooperation with countries along all points of the fisheries supply chain, both on shore and at sea, to raise awareness about the impact of IUU fishing and attack criminal networks, not just individual poachers.
- 9. Further enhance collaboration with INTERPOL, including through potential for CGIS Special Agent to serve as Coordinator of Fisheries Enforcement, stationed in Lyon, France.

#### **INITIATIVE 4:**

# Confront Predatory and Irresponsible Actions

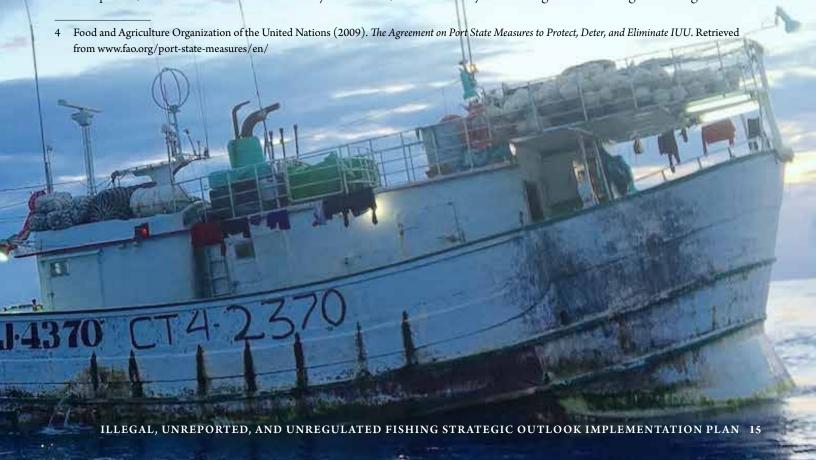
LEAD | U.S. Coast Guard Assistant Commandant for Response Policy (CG-5R), U.S. Coast Guard Atlantic Area, U.S. Coast Guard Pacific Area

SUPPORTING | U.S. Coast Guard Assistant Commandant for Intelligence (CG-2), U.S. Coast Guard Director of International Affairs and Foreign Policy (CG-DCO-I), U.S. Coast Guard Investigative Service (CGIS)



The U.S. Coast Guard is the world's premier multi-mission maritime service. We have a duty to demonstrate responsible action in the maritime domain. Working alongside like-minded partners with similar values and ideals, we will promote good global and regional maritime governance and deliver a strong, united response to states that continue to engage in predatory behavior, as well as those who disregard territorial integrity and responsible and respectful use of marine resources. Together, we will reinforce expectations that all fishing nations exercise responsible flag state control over their vessels, including distant water fleets, and demonstrate that they are taking the necessary steps to ensure compliance with international governance structures. We will spotlight those actors violating international norms, particularly those using IUU fishing as a tool of national power.

- 1. Model responsible and appropriate behavior in the maritime domain, calling out those nations that similarly demonstrate appropriate behavior and actions that uphold the rule of law and behave with restraint and professionalism in the exercise of their authorities.
- 2. Actively participate as a member of U.S. delegations in international fora to provide maritime law enforcement expertise and support U.S. strategic priorities.
- 3. Advocate in multilateral and bilateral forums and through key leader engagements for partner nations to ratify the Port States Measures Agreement (PSMA).<sup>4</sup>
- 4. Highlight patterns of irresponsible maritime behavior, including aggressive activities and frequent international fishing violations, and work within RFMOs and other international bodies to increase awareness and compliance.
- 5. Leverage existing channels such as INTERPOL, Regional Coast Guard Forums, and country teams to broadcast irresponsible and predatory behavior to the international community, trigger accountability mechanisms such as those in the PSMA, and enable partner agencies and governments to block illicit products from entering global markets.
- 6. Continue to investigate leads from high seas boarding and inspection of fishing vessels, linking known vessels, fleets, companies, and owners to criminal activity in the U.S., such as money laundering and other illegal banking activities.



# Outcomes of Counter-IUU Fishing Operations

U.S. Coast Guard operations are a vital contribution to U.S. Government actions to address IUU fishing, and our enduring partnerships and efficient information sharing are the keys to eliminating opportunities for IUU fishing operations worldwide. Through the implementation of our *Illegal, Unreported, and Unregulated (IUU) Fishing Strategic Outlook*, we will expand a network of like minded partners who, when working together, can illuminate the shadows where IUU fishing takes place and confront malign fishing actors and complicit flag states wherever they exist. Outcomes from such joint counter IUU fishing operations can take many forms. U.S. Coast Guard interactions with foreign IUU fleets and vessels will often enable additional information to be gathered about IUU practices; and at times, they may also result in diplomatic actions or sanctions and/or law enforcement action by the United States or partner nations.



#### **DIPLOMATIC PROCESSES**

U.S. Coast Guard operations provide the U.S. Government opportunities to enhance partnerships with nations who share similar values of democracy and sovereignty, as well as diplomatic leverage to hold flag states accountable for actions that threaten peace and stability around the globe. Informed by our operations, the U.S. Department of State can pursue formal diplomatic petitions and protests to foreign governments that allow their fishing fleets to engage in IUU fishing and build coalitions with like-minded nations to prevent IUU fishing-derived products or misrepresented seafood from entering global markets.





U.S Coast Guard operations and aggressive information sharing increase global awareness of IUU fishing through the use of INTERPOL Notices, the process by which the international community may seek or provide information on modus operandi, objects, devices, and concealment methods used by IUU fishing operators. Notices are seen by law enforcement officers in member countries around the world and can trigger additional information and intelligence on the possible crimes of persons and entities included in the notice.

#### HIGH SEAS BOARDING AND INSPECTIONS

U.S. Coast Guard operations support Regional Fisheries Management Organizations (RFMOs) by actively monitoring, controlling, and surveilling high seas fishing fleets through at sea inspections. These actions enliven the process for the international community to hold IUU fishing actors accountable. U.S. Coast Guard operations directly support U.S. and partner nation efforts to celebrate the behavior of responsible fishing nations and call out those nations acting irresponsibly.





#### **PORT STATE CONTROLS**

U.S. Coast Guard operations support global efforts to cooperate with like minded nations to block IUU fishers from offloading catch through the United Nations' Port State Measures Agreement (PSMA). Denying port entry, and access to port services, prevents illegal seafood from entering international trade markets, increases the costs associated with IUU fishing operations, and removes the opportunity to profit from engaging in these activities.



#### **INCREASED MARITIME DOMAIN AWARENESS**

U.S. Coast Guard observations during the course of overflights, law enforcement boardings, and alongside right of approach questioning increase intelligence to inform U.S. Government understanding of IUU fishing trends, tactics, and vulnerabilities. When shared with like minded partners, this information raises global awareness of IUU fishing threats and supports efforts to deter, detect, and interdict illicit operations.

#### IUU FISHING VESSEL LISTS

Identifying vessels engaged in IUU fishing enables the international community to prohibit illicit operators from fishing in areas managed by RFMOs around the globe and promotes alignment with established maritime international norms. The U.S. Coast Guard identifies illegal fishing vessels through boardings and inspections and shares investigative results with RFMOs to inform IUU vessel lists. A vessel's inclusion on these lists triggers additional port control measures like those covered in the PSMA.



#### STRATEGIC MESSAGING

U.S. Coast Guard operations shape and support foreign policy objectives only when the public understands the scope of the IUU fishing problem and its consequences and what we are doing to combat it. Active use of the media is crucial in modern diplomacy to ensure the public is informed and aware of challenges across the globe. The United States routinely shares information with the public to combat IUU fishing. The U.S. Coast Guard will aim to generate transparent communications to citizens of countries that are actively engaged in combatting IUU fishing, while simultaneously

broadcasting to the world inactions by irresponsible and predatory flag states.





#### **INITIATIVE 5:**

## Train Our People

LEAD | U.S. Coast Guard FORCECOM Training Division (FC-T)

SUPPORTING | U.S. Coast Guard Assistant Commandant for Response Policy (CG-5R), U.S. Coast Guard Assistant Commandant for Intelligence (CG-2)

In order to achieve difference-making mission excellence, the U.S. Coast Guard must invest in the development of our people - our greatest asset. We will train and support our personnel, empowering them with the information, knowledge, skills, equipment, and support systems needed to excel in counter-IUU fishing operations

- 1. Establish an internal IUU fishing training working group to evaluate the U.S. Coast Guard's current training capability and identify areas where training needs to be bolstered to improve mission performance.
- 2. Identify critical skill sets and knowledge requirements of personnel who are best suited to train others based on their background and expertise in the U.S. Coast Guard's Living Marine Resource and other Law Enforcement missions. Leveraging baseline knowledge in these missions will be vital to successful training and operations.
- 3. Develop specialized training for counter-IUU fishing operations to include a RFMO training course and just-in-time style training for international fisheries engagements and operations.
- 4. Establish and train IUU fisheries law enforcement detachments (FISHDETs) that can deploy in support of major operations and foreign partner capacity building.
- 5. Train U.S. Coast Guard Intelligence staffs to analyze and interupt IUU fishing threat finances.
- 6. Collaborate with NOAA and Department of Homeland Security partners to both identify IUU fishing indicators in U.S. ports and develop training modules that enhance awareness of enforcement measures and practices that bolster U.S. domestic seafood import controls. Train U.S. Coast Guard Port State Control personnel to detect and appropriately report suspicious activity.





#### **INITIATIVE 6:**

# **Build Partner Nation Capability**

LEAD | U.S. Coast Guard Director of International Affairs and Foreign Policy (CG-DCO-I)

SUPPORTING | U.S. Coast Guard Assistant Commandant for Response Policy (CG-5R), U.S. Coast Guard FORCECOM Training Division (FC-T), U.S. Coast Guard Investigative Service (CGIS), U.S. Coast Guard Atlantic Area, U.S. Coast Guard Pacific Area

As public awareness of the detrimental impacts of IUU fishing grows, so does the demand for U.S. Coast Guard training and technical assistance. Partner nations are increasingly requesting training and technical assistance from the U.S. Coast Guard through both formal and informal channels to strengthen multilateral fisheries enforcement cooperation. Through this Initiative, we will work internally and within the U.S. interagency to improve delivery of port security and fisheries enforcement training to foreign partners. We will also harmonize existing U.S. Coast Guard efforts to support and build capacity of international partners, particularly in priority regions and flag states.

- 1. Develop a five-day (in-person) IUU Fishing Seminar curriculum to incorporate into existing partner nation comprehensive training programs. Develop course Measures of Effectiveness to guide follow-on curriculum adjustments.
- 2. Partner with Training Center Yorktown and Maritime Law Enforcement Academy to incorporate IUU fishing enforcement elements into existing compatible curricula, including Boarding Officer and Maritime Law Enforcement Instructor courses, as well as the new Advanced Boarding Officer Mobile Training course.
- 3. Prioritize partner nation requests for IUU fisheries enforcement training programs (including the IUU Fishing Seminar) to meet the greatest need. Priority will be determined both through DCO-I's international engagement strategy development as well as through the Maritime SAFE Act Working Group's process to identify priority regions and flag states.
- 4. Establish a U.S. Coast Guard International Fisheries Training Team to deliver training on the policy, regulatory, and technical development of fisheries law enforcement practices and assist partner nations to develop high seas boarding procedures, including RFMO high seas boarding and inspection regimes.
- 5. Build and strengthen partnerships with U.S. federal agencies, NGOs, and private organizations to increase interoperability and enhance delivery of joint, consistent counter-IUU fishing and port security and enforcement training in priority regions and flag states.
- 6. Partner with INTERPOL to assess the needs of law enforcement in vulnerable countries and provide tools and support to ensure they can disrupt trafficking routes and enforce national fisheries laws. Implementation of this project is subject to the availability of funds.

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and build capacity of international
partners, particularly in priority
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#### **INITIATIVE 7:**

## Streamline Information Sharing

LEAD | U.S. Coast Guard Assistant Commandant for Intelligence (CG-2)

SUPPORTING | U.S. Coast Guard Assistant Commandant for Response Policy (CG-5R), U.S. Coast Guard Director of International Affairs and Foreign Policy (CG-DCO-I), U.S. Coast Guard Atlantic Area, U.S. Coast Guard Pacific Area

Illicit actors succeed by identifying and exploiting gaps in international fisheries governance and enforcement systems. The inability of partners to share information regarding IUU fishing threats creates shadows where IUU fishing occurs. Developing mechanisms to streamline information sharing among maritime partners will help bring illicit operations into the light and enable effective enforcement. We will aggressively seek opportunities to share relevant IUU fishing information with interagency partners, international governing bodies, foreign partners, and NGOs to increase visibility and ensure collective awareness of the IUU fishing threat. We will place particular emphasis on leveraging the current bilateral agreement process and associated outreach, which could potentially triple the U.S. Coast Guard's ability to establish meaningful information sharing agreements. The key lynchpin in supporting our partner nations is through information sharing arrangements and memorandums of understanding (MOUs). These MOUs must become a U.S. Coast Guard priority: they are the foundation of information sharing and will enable the foreign disclosure process to release sensitive U.S. Coast Guard-owned information.

- 1. Develop interagency and intergovernmental information sharing processes that enable a U.S. Government-wide approach to IUU fishing enforcement.
- 2. Evaluate current law enforcement bilateral agreements to determine if additional security protocols should be added to support expanded information sharing. Add Controlled Unclassified Information sharing provisions to the DOS-approved standing law enforcement bilateral agreement template to support development of future agreements.





- 3. Evaluate partner nation technology infrastructure to understand their ability to receive and disseminate IUU fishing related data and information; coordinate with U.S. interagency partners to support where limitations exist.
- 4. Prioritize the use of unclassified and publically available information and tools that are widely sharable with other governments and NGOs.
- 5. Leverage the Information Sharing and Safeguarding Governance Board to expedite development of additional information sharing MOUs to support IUU fishing enforcement where needed. Prioritize bilateral partners that are most responsive to U.S. Coast Guard engagement requests and that have a historical working relationship with the U.S. Coast Guard.
- 6. Ensure each information sharing MOU has a lead action officer. Conduct periodic subject matter expert personnel exchanges between the service and partner nation to support MOU implementation. Subject matter experts should have access to U.S. secure communications and a thorough understanding of information release protocols.
- 7. Identify the information, training, tactics, techniques, procedures, and products that need to be shared in support of joint IUU fishing enforcement operations. Establish clear lines of communication and information sharing limitations with partner nations prior to commencement of operations.
- 8. Increase U.S. Coast Guard Liaison Officers in academic, NGO, and U.S. Government positions to maximize information and product sharing.
- 9. Identify key partner nation maritime fusion centers to engage with and provide information fusion, analytics training, and best practices in order to build capacity to utilize shared information.
- 10. Expand the U.S. Coast Guard international affairs and Attaché programs to build the multilateral ties to meet the Interim National Security Strategic Guidance.
- 11. Establish and deepen partnerships, particularly with NGOs, academia, and private sector partners, to identify and leverage information sharing platforms, analysis processes and software, and distribution networks that improve international access to unclassified information and intelligence.

#### **INITIATIVE 8:**

## Communicate Strategically

LEAD | U.S. Coast Guard Director of Governmental and Public Affairs (CG-092)

SUPPORTING | U.S. Coast Guard Assistant Commandant for Response Policy (CG-5R), U.S. Coast Guard Director of International Affairs and Foreign Policy (CG-DCO-I), U.S. Coast Guard Atlantic Area, U.S. Coast Guard Pacific Area, U.S. Coast Guard Investigative Service (CGIS)

Increasing public awareness of the threat IUU fishing presents to legitimate fishers, markets, and vulnerable coastal states is paramount. Citizens around the globe must be aware of the impacts of IUU fishing, as well as the actions taken by the U.S. Coast Guard and our partners to combat it. We will prioritize the steady and consistent communication of our collective efforts and accomplishments to the American public and the international community.



- 1. Coordinate strategic messaging campaign with U.S. partner agencies primarily NOAA, DOS, DOD, and USAID to ensure consistent, impactful communications that support U.S. strategic priorities.
- 2. Develop a library of authoritative, publicly releasable material that identifies irresponsible and predatory actors and highlights counter-IUU actions of the U.S. Coast Guard and our partners.
- 3. Create robust social and multimedia campaigns and products for U.S. Coast Guard information platforms and DOS Foreign Press Centers and regional media hubs. Materials should be available in English, Spanish, French, Portuguese and Bahasa.
- 4. Leverage U.S. Coast Guard personnel assigned to U.S. Missions overseas to request U.S. Embassy Public Affairs Staffs release targeted messaging on IUU fishing through their social media platforms. Have the necessary instructions, authorities, and resources to increase communications related to IUU fishing, including:
  - i. A directive to coordinate with U.S. Mission Public Affairs Section (PAS) and U.S. Coast Guard External Affairs staff elements to increase IUU fishing content in social media engagement with the host country and in appropriate public engagements by the Chief of Mission.
  - ii. Prior clearance to engage local media and NGOs on-the-record using cleared IUU fishing-related content (as appropriate to local circumstances). The U.S. Coast Guard representative should work with PAS and other Mission sections to find appropriate academic and other stakeholder organizations with whom to engage.
  - iii. Regular updates of host nation activities to counter IUU fishing and reporting to the appropriate U.S. Coast Guard stakeholders.
- 5. Partner with like-minded governments, private organizations, private organizations, think tanks, academia and NGOs to amplify U.S. strategic messaging, build support for counter-IUU fishing efforts, and challenge false narratives from irresponsible actors.



#### **INITIATIVE 9:**

# Implement Innovative Technology

LEAD | U.S. Coast Guard Assistant Commandant for Acquisition (CG-9)

SUPPORTING | U.S. Coast Guard Assistant Commandant for Intelligence (CG-2), U.S. Coast Guard Assistant Commandant for Response Policy (CG-5R), U.S. Coast Guard Assistant Commandant for C4IT (CG-6), U.S. Coast Guard Assistant Commandant for Capability (CG-7), U.S. Coast Guard Atlantic Area, U.S. Coast Guard Pacific Area



The U.S. Coast Guard will stay abreast of advancements in new technology to combat IUU fishing. We will invest in digital tools, information technology infrastructure, and partnerships to enhance our ability to identify, target, and interdict illicit actors and disrupt the corrupt cycles of influence that enable illegal operations.

#### **Next Steps:**

- 1. Assess and promote development of technologies such as unmanned systems, sensors, autonomy, communications, rapid data analytics, and data networks to enable intelligence, surveillance, and reconnaissance across large and remote areas of the maritime domain.
- 2. Leverage the U.S. Coast Guard Research, Development, Testing, and Evaluation (RDT&E) and Innovation Program (CG-926) to identify, assess, and operationally test promising technologies through entities such as the Research and Development Center, Blue Technology Center of Expertise, Defense Innovation Unit, academia, and through research and development partnerships with DHS Science and Technology, DOD, and NGO stakeholders such as Global Fishing Watch.

3. Stay abreast of private sector technology solutions to IUU fishing challenges and seek opportunities to collaborate with them, as appropriate.



#### **INITIATIVE 10:**

## Measure Performance

LEAD | U.S. Coast Guard Assistant Commandant for Response Policy (CG-5R)

SUPPORTING | U.S. Coast Guard Assistant Commandant for Intelligence (CG-2), U.S. Coast Guard Assistant Commandant for C4IT (CG-6), U.S. Coast Guard Assistant Commandant for Capability (CG-7), U.S. Coast Guard Assistant Commandant for Acquisition (CG-9), U.S. Coast Guard Director of International Affairs and Foreign Policy (CG-DCO-I), U.S. Coast Guard FORCECOM Training Division (FC-T), U.S. Coast Guard Atlantic Area, U.S. Coast Guard Pacific Area

In order to effectively and efficiently meet the objectives of the *IUU Fishing Strategic Outlook* and accomplish the Initiatives and Actions in this Implementation Plan, the U.S. Coast Guard must develop the ability to measure performance and respond to changing conditions. We will develop and improve our ability to conduct continuous qualitative and quantitative analyses that inform decision makers at the strategic, operational, and tactical levels.

- 1. Develop a robust suite of performance metrics to gauge U.S. Coast Guard effectiveness in meeting the objectives outlined in the *IUU Fishing Strategic Outlook* and this Implementation Plan.
- Identify near real-time metrics that enable the Service to remain nimble in responding to shifting trends and partner
  needs in the ongoing campaign to counter IUU fishing. Exercise operational flexibility to respond to evolving threats and
  shifting areas of focus based on location of predatory behavior.
- 3. Update this Implementation Plan as necessary to ensure the U.S. Coast Guard remains focused on key mission priorities and is appropriately resourced.
- 4. Prepare an annual *IUU Fishing Strategic Outlook Annual Report* to document the previous year's progress and outline goals for the following year.









U.S. COAST GUARD HEADQUARTERS WASHINGTON, D.C.

US COAST GUARD OFFICE OF LAW ENFORCEMENT FISHERIES ENFORCEMENT DIVISION (CG-MLE-4)

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