
Mapping the extent of Chinese ownership and its linkages to IUU fishing amongst Gambia's trawl sector



Trawler in The Gambia's waters. Credit: Sea Shepherd

Introduction

Illegal, unreported, and unregulated (IUU) fishing is increasingly seen as a form of transnational organised crime¹. It is commonly associated with offences such as forgery, fraud, money laundering, corruption, and human trafficking². IUU fishing is highly lucrative, resulting in billions of dollars of illicit financial flows every year³.

Key to dismantling the networks behind these operations is the ability to identify and hold to account the actors who are the orchestrators of illicit activity and the ultimate recipients of its profits. This is no easy task. IUU fishing operations may span continents and oceans, involving players far removed from activities at sea. Opaque corporate structures are developed to conceal the identities of beneficiaries, allowing them to profit from IUU fishing with low risk of detection^{4,5}. Tracking financial flows and reaching behind corporate arrangements requires a high degree of cooperation across agencies, borders, and disciplines.

Given these challenges, fisheries enforcement has traditionally targeted the registered owners, local agents, and captains of fishing vessels. However, individuals that hold actual operational and economic control of the vessels can assign new entities to these roles, continuing their activities and evading sanctions⁶. There is also the risk of inadequate sanctions being levied that do not consider the means available to the ultimate beneficial owners (financial and otherwise) and therefore fail to serve as an effective deterrent against engaging in future illegal activities⁷.

The Gambia's marine fisheries have historically been characterised by their abundance and richness in diversity⁸, therefore playing a vital role in national food security and significantly contributing to the socio-economic wellbeing of the country⁹. However, fish populations are under threat from overexploitation, worsened further by the coupled stressors of IUU fishing and global heating, with detrimental impacts on fish populations and ecosystem health evidenced to date^{10,11}.

A number of foreign fleets are, and have historically been, present in The Gambia, most notably those from Europe, China, and Senegal¹². Recently however, the country reflects a broader pattern seen in West Africa, as China's distant water fleet (DWF) has become the dominant actor in The Gambia's demersal (bottom) trawl sector. Beyond the presence of Chinese vessels in the country, three Chinese-owned fishmeal and fish oil factories have been established¹³. These factories have been heavily implicated in fuelling the overexploitation of The Gambia's fisheries and have been associated with high levels of IUU fishing¹⁴.

The increased presence of Chinese vessels in the waters of African coastal states is linked to the nation's Belt and Road Initiative (BRI), which was developed in 2013 as a means of increasing overseas cooperation and investment through infrastructural projects in over 140 countries¹⁵. In 2018, estimates suggest that the total cost of global projects that were either completed, in progress or planned as part of the initiative amounted to US\$575 billion¹⁶. In its most recent strategy papers on its DWF industry, the Chinese government has been encouraging Chinese DWF companies to use investment and harbour/base construction to gain fishing access in foreign countries^{17,18}. Since then, several African nations have signed or have constructed fishing harbours with cooperation from China¹⁹.

Globally, Chinese fishing ventures have been criticised for their lack of transparency, which can make it difficult to determine the true level of fishing capacity and catch, and whether activities are legal and sustainable. They increasingly operate using shell companies, artificial joint ventures, and 'flags of convenience' to access fisheries and hide their true beneficial ownership. 'Flags of convenience' and 'flag-hopping' enable vessels to easily change registries and identities - which helps to avoid identification and sanctions for wrongdoing.

The Chinese DWF has also been criticised for its engagement in fishing violations including operating without valid licences, fishing in prohibited areas, using banned fishing gears, and under-reporting catch²⁰. However, these widespread illegalities have not deterred some West African countries from registering and licensing an increasing number of Chinese vessels in recent years.

This briefing provides an overview of the current state of play regarding the fleet of Chinese-flagged or owned fishing vessels operating in The Gambia. The analysis is based on the latest list of vessels authorised to fish in Gambian waters available to EJF, covering the year 2020, alongside other internet sources including government publications and non-governmental organisation (NGO) reports. It seeks to explore two issues: the prevalence of Chinese-owned trawlers and supporting fleets in the country's Exclusive Economic Zone (EEZ) and the extent to which these vessels, and/or their owners, have a history of IUU fishing. This research focuses on the country's trawl sector, given the year-round presence of the vessels in The Gambia's waters (as opposed to tuna vessels which are sporadically present dependent on the season), and the socio-economic and ecological harm that is associated with trawling vessels in West Africa and more broadly²¹.

The findings of this briefing have important implications for fisheries governance in China and The Gambia, adding to a growing body of research documenting both the magnitude and behaviour of the Chinese DWF²². A series of recommendations are made with the goal of increasing transparency as a means of addressing IUU fishing in the country, thereby driving improvements in ecosystem health with all the economic, environmental, and social benefits that this entails.

Status of the Gambia's marine fisheries resources

As an essential source of food, income, and foreign revenue, The Gambia's marine fishery resources contribute significantly to the socio-economic wellbeing of the country²³. Given the informal, and largely unrecorded nature of The Gambia's artisanal fisheries, it is difficult to determine the exact economic contribution of the sector - with estimates over the last decade stating that fisheries represent anywhere between 1.8% and 12% of the country's gross domestic product²⁴. Fisheries also play an essential role in national food and nutritional security, as a primary source of animal protein in the Gambian diet²⁵. It is estimated that the livelihoods of 200,000 people in The Gambia are critically dependent on fish and fisheries²⁶. Approximately 30,000 people are directly and indirectly employed by The Gambia's artisanal fisheries²⁷, with the industrial sector providing employment to approximately 2,000 people²⁸.

Despite their significance, The Gambia's fisheries are currently facing multiple stressors that present an existential threat to the future of the country's fish populations. These threats include overfishing, IUU fishing, and global heating, all of which are likely to have a detrimental impact on the livelihoods and wellbeing of those relying on fish as a source of income and food.

Reliable data on fish populations for The Gambia is limited. However, the results of previous surveys indicate that many key marine fish populations are overfished or fully exploited²⁹. Catch-per-unit-effort data indicates that the populations of key species such as shrimp, croakers, catfish, and groupers have significantly declined as a result of overexploitation³⁰. This decline in marine resources presents a direct threat to the people dependent on fisheries as a source of food and income. Declining fish populations are undermining food and nutritional security, with less fish available for local consumption³¹.

IUU fishing significantly contributes to the depletion of fish populations³², exacerbating further the issue of overexploitation. The Gambia's coastline is plagued by illegal fishing, particularly industrial trawlers that breach the country's regulations by fishing within zones reserved for artisanal fishers³³. Illegal catches were estimated to be equivalent to 12% of legal catches in 2010³⁴. In recognition of the need for mechanisms to combat IUU fishing, in 2016 the Gambian Ministry for Fisheries and Water Resources formed a partnership with the NGO Sea Shepherd³⁵, combating IUU fishing and enforcing fisheries regulations and conservation laws through joint at-sea patrols³⁶.

Declining fish populations in the country have been further exacerbated by the establishment of three Chinese-owned fishmeal and fish oil factories along its shores^{37,38}. The factories have been accused of fuelling both overfishing and IUU fishing, with experts reporting that fishmeal is one of the main drivers of IUU fishing in The Gambia³⁹. In 2016, one plant accounted for 40% of The Gambia's reported catches, with the fishmeal and fish oil produced being exported entirely to foreign markets⁴⁰. Pollution from the factories has caused fish mortality in the surrounding area and has negatively impacted the health of local communities⁴¹. By targeting species such as sardinella and bonga, which play a critical role in local fish consumption, the factories are contributing to a national rise in food and nutritional insecurity⁴². In 2018, Golden Lead fishmeal and fish oil processing company was issued a six-month licence for two fishing trawlers GOLDEN LEAD 1 and GOLDEN 2, to supply fish for the fishmeal factory. Four months after the issuance of the licence, the Gambian navy impounded GOLDEN LEAD 1 for using prohibited fishing nets and for fishing in a prohibited zone reserved for artisanal fishers⁴³.

Gambian fisheries, much like West African fisheries more broadly are highly sensitive to the impacts of global heating^{44,45}, with an overall decline in fisheries productivity predicted for the region⁴⁶. The impact of climate-related stresses on growth, mortality, and other traits are likely to be much greater for fish populations that already suffer the effects of over-exploitation and depletion⁴⁷.

The Gambia's industrial trawl sector

Approximately 90% of fishing vessels legally operating in Gambian waters are foreign owned⁴⁸. Due to a lack of proper infrastructure, the majority of industrial vessels land their catch entirely abroad - paying a levy of 10% of the catch-value to the Gambian government⁴⁹. Since 2017, this has generated over US\$3,968,200⁵⁰ for the Gambian government. However, by landing, processing, packaging, and labelling their catches as foreign products in the ports of neighbouring countries, mainly Senegal⁵¹, vessels are depriving The Gambia of foreign exchange and employment-generating opportunities while reducing the availability of fish for local consumption⁵².

At present, the Gambian Ministry for Fisheries and Water Resources does not publish details regarding licences granted. Information on licences is therefore not publicly available and may only be accessed through requests to the government, contributing to the opacity of the sector⁵³. In 2019, 44 licences were issued to industrial trawlers. This figure increased to 46 in 2020. The full details of the licensed trawlers can be found in **Table 1**.

Industrial trawlers operating within The Gambia's EEZ mainly target cephalopods, shrimp, and other high value species such as barracuda, grouper, and snapper⁵⁴. The annual licence fees paid by foreign industrial trawlers are US\$185 per GRT for fish and cephalopod trawlers, US\$231 per GRT for shrimp trawlers, and US\$83 per Gross Register Tonnage (GRT) for pelagic trawlers. Meanwhile, local vessels are charged US\$116 per GRT per annum for fish and cephalopod trawlers, US\$154 per GRT for shrimp trawlers, and US\$70 per GRT for pelagic trawlers⁵⁵. Since 2017, industrial vessel licence fees have generated approximately US\$2,682,195⁵⁶. However, the Ministry of Fisheries has not provided a breakdown of revenue by year or by gear type.

In response to declining fish populations, the Gambian government placed a moratorium on industrial fishing from late 2015 to 2017. During this period, the absence of foreign fleets resulted in higher fish catch and fishery profits for local small-scale fishers⁵⁷. However, in 2017 the ban was lifted, and 72 new licences were granted to foreign industrial vessels⁵⁸.



Trawler in The Gambia's waters. Credit: Sea Shepherd

Legal provisions regarding ownership of industrial trawl vessels and access to The Gambia's coastal waters

The responsibility for the management of The Gambia's coastal fisheries currently rests with the Ministry of Fisheries and Water Resources. The Fisheries Act 2007⁵⁹, details the preconditions required for the issuance of licences to operate industrial vessels within The Gambia's EEZ.

The Act stipulates that a vessel shall not be registered on the Registry of Fishing Vessels unless the Director is satisfied that:

- The vessel, or its owner, has not been convicted within the last five years of an offence under the Act or its regulations
- The vessel, or its owner, has not been convicted within the last five years of an offence under the laws of The Gambia governing navigation, customs, immigration, fiscal measures, health, narcotics or firearms
- No evidence exists that gives reasonable cause to believe that the vessel has undermined the effectiveness of international conservation and management measures, or has taken part in illegal fishing in the waters of another State or in international waters

The Director shall also decide to remove the responsible status of a registered fishing vessel and accord that vessel the status of 'delinquent' if:

- The vessel, or its owner or operator has repeatedly violated the provisions of the Act and its regulations
- The vessel, or its owner or operator, has repeatedly violated any law of The Gambia governing navigation, customs, immigration, fiscal measures, health, narcotics, or firearms
- Evidence exists that gives reasonable cause to believe that the vessel has committed a serious offence against the fisheries laws or regulations of another sub-regional State or any international conservation and management measures, and it has not been possible to bring the vessel or its owner or operator to trial
- The owner has submitted information that is untrue, incomplete, or incorrect in connection with their application for Registration

In addition, the following stipulations exist regarding the registration of foreign industrial vessels:

- Foreign vessels must appoint an agent, who is a Gambian national, to accept full legal responsibility on behalf of the owner
- Vessels must be accorded a responsible status on the Register of Fishing Vessels
- The costs of fisheries observers to be placed on-board must be covered by the vessel operator, including any costs incurred travelling to and from the vessel, the full amount of their salary as specified by the Director, and full insurance cover

Ownership in practice - Chinese interests in the trawl sector

To determine the extent of Chinese interests in the Gambian trawl sector, an analysis was conducted of all vessels permitted to operate in the country's EEZ in 2020. The 2020 licence list was selected as it is the most recent complete list of vessels published at the time of writing this report.

Ascertaining which vessels on the list were linked to China was done through a two-fold process – firstly by identifying those flying the flag of China, as documented in the licence list, and secondly looking at those that were not flagged to China but could be linked with sufficient certainty to Chinese beneficial owners. Ownership information was collated from information obtained from the Gambian administration and from open source and paid subscription sources including information and documents available on the Chinese Ministry of Agriculture and Rural Affairs (MARA) and Ministry of Commerce (MOFCOM) websites, and IHS-Seaweb from IHS Markit, which is widely considered to be the most up to date database of vessel information. IHS Markit are “the sole authority with responsibility for assigning and validating” International Maritime Organization (IMO) numbers to vessels, which are unique seven-digit numbers that remain with the vessels for their lifetime, regardless of flag or ownership changes⁶⁰.

In 2020, of the 45 trawlers licensed to operate in The Gambian EEZ, 14 were flagged to China. There were an additional 21 trawlers for which Chinese ownership could be established. No Chinese-flagged support vessels were licensed in 2020. These figures indicate that Chinese-flagged and owned vessels constituted 78% of The Gambia's licensed trawl sector. These vessels equate to 66% of the GRT of the non-tuna fishing sector.

As is the case in a number of other West African countries, the licences and ownership of vessels in The Gambia's trawl sector are held by a small number of companies. Four Chinese entities (all privately owned) and eight local representatives accounted for the 35 Chinese-owned vessels operating in the country (full details of vessel name, beneficial ownership and local representatives can be found in **Table 1**. These dynamics demonstrate the relatively concentrated financial beneficiaries and distribution of power within the trawl sector.



Canoe fishermen in The Gambia. Credit: Changing Markets Foundation

Table 1 - Chinese-owned trawlers licensed to operate in The Gambia in 2020⁶¹

Vessel/fleet names	Flag	Local representative	Chinese beneficial owner
FU YUAN YU 9882/9886/9887/9890	China	Johm Fisheries	Fujian Anda Pelagic Fishery Co., Ltd. ⁶²
HANSEN 01/03/05/07 ⁶³	The Gambia	AB Ventures	Unknown
QUNLONG 3/5 ⁶⁴	The Gambia	Qunlong Fishing	Unknown
LUCKY 902/905/906/907/908/ 909/910/915/916 ⁶⁵	The Gambia	Modou A. Jallow	Unknown
XIN XI WANG 6	China	Kuyateh's Trading	Unknown
GORDE 105/106/107	China	Demco Agency	Unknown
LU QING XIN YUAN YU 005/006/007/008	China	Demco Agency	Qingdao Kaihang Fisheries Co., Ltd. ⁶⁶
SUPERFLY 1/2/3/4 ⁶⁷	The Gambia	E&A Fishing Ent.	Unknown
CHANG YUAN YU 11/12	The Gambia	Modou A. Jallow	Dalian Changhai Ocean Fisheries Co., Ltd. ⁶⁸
LU LAO YUAN YU 010/011	China	Cassama Jabi	Qingdao Tangfeng Ocean Fishery Co., Ltd. ⁶⁹

It should be noted that in order to carry out fishing operations overseas, a Chinese DWF company must apply to the Chinese authority for approval of its specific offshore fishery project(s), i.e. to allow its designated vessels to operate in a country's EEZ, within a Regional Fisheries Management Organisation (RFMO) Convention Area, or on the high seas⁷⁰. However, of the 35 vessels found to be linked to Chinese ownership, 71% are not included in the list of vessels authorised by the Chinese government to operate in foreign EEZs during the period 2019-2020⁷¹.

CASE STUDY: Closing the net on the GORDE fleet

The Chinese-owned GORDE fleet (GORDE 105/106/107) were identified by Gambian law enforcement agents and NGO Sea Shepherd as conducting IUU fishing in The Gambia, with all three spotted fishing within the country's Inshore Exclusion Zone (IEZ) – an area reserved for artisanal canoe fishers. Two of the vessels (GORDE 105 & 107) were also found to be 'double bagging' their fishing nets – in which one net is placed within another to reduce the selectivity of hauls and yield a larger catch⁷².

Both of these forms of IUU fishing have been commonplace in recent years within West Africa, threatening the sustainability of fisheries by aiding illegal operators to catch both non-target species and juveniles who have yet to reach sexual maturity, thereby interrupting the reproductive cycle. Furthermore, incursions into the IEZ place trawlers and canoe fishers in direct economic and spatial competition, which can lead to the loss of livelihoods as well as jeopardise the safety of canoe fishers, who risk being bulldozed by significantly larger industrial vessels. Elsewhere in the region, these incursions appear to be on the rise. A survey conducted by EJJ amongst coastal fishers in Ghana, for example, found that 75% reported an increase of interaction with trawlers in the past 5 years, and 70% had suffered damage to their fishing equipment as a result⁷³.

Likely as a result of increased scrutiny, the GORDE vessels eventually departed West Africa with a view to obtaining trawling licences in Madagascar – a journey that was in part facilitated by the Chinese Navy. En route to the East African country in May 2021, the vessels anchored without permission in the Seychelles, eventually being brought in for inspection. At the time, the captains produced documents to claim that they had legitimate business in the region; however, EJJ found that the documents were forged, raising questions about the vessels' true identity and intentions. Further doubts were raised when EJJ found a number of other red flags indicative of fleet-wide fraudulent behaviours – these include *inter alia*, a number of codes ascribed to fishing vessels by the Chinese government that were either invalid or did not correspond to existing companies, and the fact that all of the vessels when spotted in The Gambia bore identical call sign numbers.

This fleet effectively demonstrates the dynamic and deliberately evasive behaviour of illegal operators travelling, where necessary, across huge swathes of ocean in the hunt for illicit gains. They similarly show the benefits of, and need for, transboundary and inter-agency communications as well as a broader drive for transparency around vessel ownership and history. By supplementing state gathered intelligence and enforcement capacity, NGOs were able to both assist in the detection and prevention of IUU fishing, gradually closing the net on what is a fleet clearly determined to operate outside of the law.

Connection to IUU fishing activities

High instances of IUU fishing within the Chinese DWF have been reported, often occurring in low-income countries where the practice is more prevalent due to limited monitoring, control, and surveillance (MCS) capacity⁷⁴. In order to ascertain the rates of IUU fishing amongst the Chinese fleet in The Gambia, open-source intelligence was sought for each vessel, collating information from NGO reports, media sources, cross-checks of the Trygg Mat Tracking (TMT) combined IUU vessel list⁷⁵, and the Spyglass.fish database which derives its data from the Criminal Record of Fishing Vessels⁷⁶. To ensure that the information was current and to increase the likelihood of ownership remaining consistent between the time of the offence and the 2020 licence list, the analysis only considered alleged offences that took place in 2010 or subsequently.

Of the 35 vessels with confirmed or suspected Chinese ownership, 15 were previously convicted of or identified for potentially engaging in IUU fishing, with an additional 4 vessels implicated through ownership of vessels previously reported for IUU fishing activities. A summary of the vessels and their IUU fishing offences can be found in **Table 2**. Offences committed include fishing within protected areas, modifying vessel Automatic Identification System (AIS), fishing without a logbook and double-bagging nets. These findings indicate that over half (54%) of Chinese-linked vessels operating in The Gambia have directly engaged in illegal fishing or have been indirectly implicated through vessel ownership.

Human rights violations and labour abuses (e.g. physical violence, threats of abuse, poor living and working conditions, difficulties in accessing drinking water and healthy food) were not cited in the arrest reports of the convicted vessels. However, an article published by the New Yorker in March 2021 details the improper living and working conditions for the crew onboard the LU LAO YUAN YU 011, operating in Gambian waters⁷⁷. Additionally, similar cases of abuse within China's DWF were the focus of a previous EJJ report released in 2020⁷⁸.

Table 2 - Chinese-owned trawlers licensed to operate in The Gambia in 2020 suspected of, or prosecuted for, IUU fishing (* indicates offence happened after 2020).

Vessel Name	Location of alleged offence	Year	Nature of alleged offence	Source
FU YUAN YU 9882	West Africa	2020	Suspected of modifying AIS	Link
FU YUAN YU 9886	Djibouti	2017	Fishing within the IEZ	Link
FU YUAN YU 9890	West Africa	2020	Suspected of modifying AIS	Link
HANSEN 01	The Gambia	2019	Fishing within the IEZ	Link
HANSEN 03	The Gambia	2019	Fishing within the IEZ	Link
HANSEN 05	The Gambia	2019	Fishing within the IEZ	Link
HANSEN 07	The Gambia	2019	Fishing within the IEZ	Link

QUNLONG 3	The Gambia	2019	Fishing within the IEZ	Link
QUNLONG 5	The Gambia	2019	Fishing within the IEZ	Link
GORDE 105	The Gambia	2020/2021	Fishing within a prohibited zone, double-bagging nets (2020)/Providing forged documents (2021)*	Link/Link
GORDE 106	The Gambia	2020/2021	Fishing within a prohibited zone (2020)/Providing forged documents (2021)*	Link/Link
GORDE 107	The Gambia	2020/2021	Fishing within a prohibited zone, double-bagging nets (2020)/Providing forged documents (2021)*	Link/Link
SUPERFLY 1	The Gambia	2020	Fishing in prohibited zone	Link
SUPERFLY 4	The Gambia	2019	Fishing within the IEZ	Link
LU LAO YUAN YU 010	The Gambia	2019	Fishing without a logbook	Link

Table 3 - Types and frequency of alleged offences linked to Chinese-owned fishing vessels that appear on Gambia's 2020 licence list

Offence	Frequency
Fishing in a closed area	12
Use of prohibited gears	2
Reporting false AIS positions	2
Fishing without a logbook	1
Providing forged documents*	3

Discussion and conclusions

The dynamics of the Gambian trawl sector, in particular the overcapacity of the fleet, the diversion of revenues abroad, and the high number of vessels operating with a history of, or with linkages to, IUU fishing, have important ramifications for The Gambia, and especially its coastal communities who rely heavily on the ocean for their livelihoods. The issues listed above represent an environmental injustice as these communities are the most severely impacted by the presence of the fleet. They face dwindling fish populations, encroachment into the IEZ and collisions with industrial vessels, whilst simultaneously deriving very little benefit from the profits that result from the presence of foreign industrial fleets.

The expansion of the Chinese fishing fleet has significantly altered the terrain of global fisheries, particularly West African nations who are arguably some of the most transformed. Across the region, Chinese influence and investment has pervaded marine environments, often with negative socio-economic and ecological consequences.

As this briefing has shown, The Gambia is not exempt from this pattern. A significant number of Chinese-owned trawlers are operating in the country's waters, many of which have been associated directly or indirectly with IUU fishing. This is the latest in a long line of foreign fleets unsustainably exploiting the country's marine resources.

A concerted effort is required to increase transparency within The Gambia's trawl sector, and across the broader region, in order to address IUU fishing. This must involve cooperation between relevant actors, including the Ministry of Fisheries and Water Resources, the government of China and international institutions such as the FAO, the World Bank, Interpol, and the EU, which remain invested in the country through its Sustainable Fisheries Partnership Agreement (SFPA).



Small-scale fishing community in The Gambia. Credit: Changing Markets Foundation

Recommendations

EJF calls on the governments of China and The Gambia to act on the following recommendations in order to improve the sustainability of fishing operations in The Gambia.

To the government of China:

- Cooperate with the government of The Gambia where relevant to identify the beneficial ownership of suspected Chinese vessels operating under the Gambian flag, to ensure any violations of national or regional fisheries conservation and management measures are levied against the appropriate parties proportionately to the size of the organisation.
- The Chinese relevant authorities should conduct a review of the Chinese-flagged/owned fishing vessels operating in The Gambia and ensure that they are duly registered by MARA as offshore fisheries projects, as required under Chinese law.
- Carry out all necessary investigations into suspected IUU fishing by Chinese-owned vessels in The Gambia, taking, where necessary, suitable punitive measures to the extent provided under Chinese law.
- Carry out retrospective checks and investigations into previous IUU fishing cases by Chinese-linked vessels in The Gambia that have not been already investigated.
- Update the national legal framework, if necessary, to ensure that Chinese nationals engaged as beneficial owners of fishing vessels flying the flag of third countries can be prosecuted for IUU fishing infringements and deterrent sanctions imposed.
- Mandate IMO numbers for all eligible vessels in the Chinese DWF.
- Establish direct channels of cooperation with the Gambian fisheries administration to be in position to carry out all necessary investigations into future possible IUU fishing by Chinese-owned vessels in The Gambia, and, where necessary, to take suitable and deterrent punitive measures to the extent provided under Chinese law.
- Adopt minimum transparency requirements for distant water fishing activities, including the development of a publicly accessible and searchable database of Chinese-owned distant water fishing vessels, including information on beneficial ownership.
- Continue to update and publish information concerning fisheries-related offences and sanctions by distant water fishing vessels ensuring comprehensiveness, credibility and accessibility of the information published.
- Ensure that up to date information on the Chinese-flagged vessels operating in The Gambia is uploaded to the FAO Global Record of Fishing Vessels, Refrigerated Transport Vessels and Supply Vessels.
- Ensure that government support in the form of subsidies, loans and other funds are not available to companies with a history of IUU fishing infringements.

To the government of The Gambia:

- Ensure all suspected fisheries-related infringements in the country are subject to thorough investigation, and that deterrent sanctions are imposed where violations are confirmed, in accordance with minimum sanctions in the national law.
- Ensure that the number of fishing licences issued for industrial trawl vessels is in line with best available scientific advice on the status of both small pelagic and demersal fish populations.
- Complete, maintain and make publicly available a detailed list of all fishing vessels authorised to fish under the Gambian flag, and continue to update and publish the list of industrial vessels licensed to operate in the EEZ of The Gambia including, where relevant, IMO numbers and details of beneficial owners.
- Furthermore, consider publishing additional information to aid transparency including details of IUU fishing infringements and revenues generated by the trawl sector.
- Conduct thorough background checks on vessels requesting to fish in the waters of The Gambia, to ensure that vessels whose beneficial owners are linked to IUU fishing are refused authorisation in line with Part VI, Section 27, of the Fisheries Act 2007.
- Ensure that national fisheries are structured to support local communities and national food security. Redouble efforts to ensure down-stream values in the processing and marketing sectors are captured within the country to maximise its benefits.



Small-scale fisher in The Gambia. Credit: Changing Markets Foundation

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