China's Global Fishing Offensive

China in our Backyard: Volume I

THE SELECT COMMITTEE ON THE STRATEGIC COMPETITION BETWEEN THE UNITED STATES AND THE CHINESE COMMUNIST PARTY

THE HOMELAND SECURITY SUBCOMMITTEE ON TRANSPORTATION AND MARITIME SECURITY

MAJORITY STAFF REPORT

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EXECUTIVE SUMMARY

Over the past year, the Select Committee on the Chinese Communist Party and the Transportation and Maritime Security Subcommittee of the House Committee on Homeland Security (Committees) investigated the People's Republic of China (PRC)'s role as the world's leading offender of illegal, unreported, and unregulated (IUU) fishing. The investigation confirmed that the PRC commands the planet's largest distant-water fishing (DWF) fleet—estimated at between 2,000 and 16,000 vessels when militia-linked and foreign-flagged craft are included. This force, which is more than triple the combined size of the fleets of Taiwan, Japan, South Korea, and Spain, drove 44 percent of global fishing effort between 2022 and 2024. Supported by a logistical web of reefers, tankers, and floating bases, this armada logs over 110 million hours annually in the waters of ninety countries, often operating for years beyond the reach of enforcement.

However, this is not merely a commercial industry; it is a deliberate instrument of the Chinese Communist Party (CCP)'s "Maritime Great Power" strategy. Beijing wields the fleet with the precision of a military command, fusing fishing vessels, state subsidies, processing plants, and overseas infrastructure into a unified geopolitical weapon. The CCP deploys and recalls these vessels like pieces on a chessboard—withdrawing them before diplomatic summits to ease tensions, surging them into disputed waters to assert leverage, and extending their presence from the South China Sea to the Antarctic.

The consequences are devastating. The United States now imports over 80 percent of its seafood, facing a deepening dependence on supply chains controlled by the PRC, the world's largest seafood exporter with $18.5 billion in annual trade. Meanwhile, developing nations absorb the cost of this expansion: West Africa forfeits $9.4 billion annually as PRC trawlers strip local waters of critical protein, while Central and South America lose over $1 billion in combined wages and tax revenue. This dominance is sustained by a "closed-loop" system of environmental ruin and human rights abuses, ranging from the enslavement of migrant workers to the destruction of over 100 square kilometers of coral reefs.

Against this threat, American defenses are outdated. U.S. toolkits were designed to regulate commercial actors, not a state-directed fleet sustained by a $7.2 billion annual subsidy regime. To uncover the mechanics of this strategy, the Committees executed a comprehensive oversight investigation to look beyond individual violations and expose the systemic architecture of the PRC's global fishing offensive.

While previous inquiries treated this challenge through the narrow lens of fisheries law, the Committees identified these violations as mere symptoms of a larger strategic system designed to project power and evade oversight. Many of the system's most consequential elements—including forced labor, gray-zone refueling, and subsidy-driven overcapacity—fall entirely outside traditional enforcement. Beijing deliberately operates within these legal seams, exploiting the gaps between maritime, labor, and trade rules. To decode this architecture, the Committees looked beyond individual catch violations to analyze the systemic mechanics of the PRC's global fishing offensive.

This comprehensive oversight investigation involved detailed briefings with the U.S. Interagency Working Group on IUU Fishing to evaluate the operational authorities of the National Oceanic and Atmospheric Administration, the U.S. Coast Guard, and the Departments of State, War, Agriculture, Homeland Security, Labor, and the Treasury, alongside the U.S. Fish and Wildlife Service, the Food and Drug Administration, and U.S. Immigration and Customs Enforcement.

These efforts were augmented by engagements with fifteen international partners, dozens of subject matter experts, and various industry groups, as well as field research in Argentina and Chile. This synthesis of data and on-the-ground observation enabled the Committees to assess the PRC's logistical networks, the resulting security impacts on U.S. interests, and the structural failures of current enforcement mechanisms. The Committees' investigation established five core findings:

1. China Built a Global System That Removes Distance as a Limit on Extraction

2. Overcapacity and Mandatory Landing Rules Force Global Seafood Through Chinese Processing Hubs

3. China Engineered a Permanent, State-Supported Cost Advantage Across All Major Production Inputs

4. China Converted Seafood Processing Dominance into Global Seafood Pricing Power

5. China Manipulates Global Seafood Markets to Eliminate U.S. Processing Capacity and Entrench American Dependence

Ultimately, these findings expose a deliberate, state-directed campaign by the CCP to achieve maritime dominance, monopolize food systems, and undermine the rules-based international order—constituting a direct threat to U.S. national security, economic sovereignty, and global stability.

PART I: BEIJING'S MARITIME PLAYBOOK

Historical Context

Beijing's approach to maritime expansion makes little sense without understanding what China lost when it abandoned the seas. In the early 15th century, the empire's treasure fleets reached East Africa and the Arabian Peninsula, projecting Ming power across half the known world. Then, almost overnight, the court turned inward. Conservatives persuaded the emperor to dismantle the fleet, outlaw ocean-going voyages, and burn the shipyards.[1] By the time British gunboats arrived during the Opium Wars, the Qing Dynasty had no effective navy left to defend its coast. From 1840 to 1949, foreign warships struck Chinese soil more than 470 times, seized ports, and extracted significant territorial and trade concessions.[2] This era of maritime helplessness would later be framed by the Chinese Communist Party (CCP) as the "century of humiliation."[3]

This history shapes how the People's Republic of China (PRC) frames its maritime strategy today. Chinese strategists describe their country as having rejoined the maritime world "victimized, disadvantaged, and late."[4] Victimized by repeated invasions from the sea;[5] geographically disadvantaged by the island chains that cage the Western Pacific and the narrow straits that could choke its lifelines;[6] and late because its own rulers had deliberately abandoned the ocean just as others were racing to claim its wealth and strategic high ground.[7]

Building a Maritime Great Power

When the CCP took power in 1949, reversing this maritime defeat became inseparable from the mission of national rejuvenation. Beijing sought to transform the country into a modern, powerful socialist state that would—in Mao Zedong's words, "stand tall in the forest of nations," by the 2049 centennial. This goal was not just about power and security, but also proving that socialism, not capitalism or democracy, offers the superior path to development and international standing.[8]

However, the new government initially lacked the means to pursue this vision. Throughout the early Cold War, scarce resources and the Soviet threat along the northern land border forced a rigid continental focus. This confined the People's Liberation Army (PLA) Navy (PLAN) to a narrow "coastal defense" posture, operating only small vessels close to shore.[9]

Deng Xiaoping's Reform and Opening policy in the late 1970s dramatically reversed these priorities.[10] Coastal industry boomed, global trade exploded, and the newly created special economic zones became almost entirely dependent on secure maritime access for their survival. As Soviet pressure

gradually eased after the late 1970s, strategic attention and resources could finally turn seaward.

That economic reorientation collided with a new international reality: the 1982 United Nations (UN) Convention on the Law of the Sea (UNCLOS) had triggered a worldwide scramble for vast maritime zones and offshore resources, and the PRC risked being left behind once again.[11] In response, around 1985 Beijing formally upgraded its naval doctrine from "coastal defense" to "Near Seas Active Defense" and launched its first genuine distant-water operations, including the initial deployment of an overseas fishing fleet.[12] The maritime agenda was no longer merely aspirational; it had become a structured, long-term state strategy.

Throughout the 1990s the PRC systematically embedded this vision into every level of national power. In 1992 the PRC enacted the Law on the Territorial Sea and the Contiguous Zone, which expansively defined its territorial sea to include Taiwan and all its associated islands, the Senkaku Islands, the Paracel Islands, Macclesfield Bank, and the Spratly Islands,[13] while introducing the pivotal new concept of "maritime rights and interests."[14] That same year, Jiang Zemin's report to the 14th Party Congress explicitly tasked the PLA with "defending national sovereignty, unity, territorial integrity and maritime rights and interests."[15] In 1993 the Central Military Commission—the PRC's top military body—issued new Military Strategic Guidelines that formally codified "Near Seas Defense" in doctrine and, according to U.S. scholars, redirected the PLA's main strategic direction from a continental focus to a maritime one.[16] A second landmark statute—the 1998 Law on the Exclusive Economic Zone and the Continental Shelf—extended the PRC's expansive jurisdictional claims seaward and preserved "historical rights" language.[17]

These 1990s milestones created an enduring foundation. The phrase "maritime rights and interests" quickly became the ideological and legal cornerstone of the PRC's entire maritime strategy. Beijing would later invoke both the 1992 and 1998 laws, together with the "historical rights" formulation, to justify its 2012 submission of straight baselines around the Senkakus to the UN and to defend its South China Sea claims against the Philippines at the Permanent Court of Arbitration in 2016.[18]

Government planning reinforced these legal and doctrinal shifts. In 1998, the State Council issued the PRC's first maritime white paper, outlining "a sustainable development strategy" to develop and control marine resources and "safeguard the new international maritime order and the state's maritime rights and interests."[19] This signaled Beijing's desire both to participate constructively in the international system and to ensure that the PRC did not continue to miss out on benefits from the ocean. Later that year, Beijing established the Marine Surveillance Force, a paramilitary law-enforcement agency and precursor to the China Coast Guard, to "protect maritime resource rights and interests from

encroachment."[20] In 2001, the PRC included maritime development goals in its Tenth Five-Year Plan for the first time, ensuring that government units at all levels would have maritime responsibilities.[21]

The goal leapt from aspiration to formal state policy in 2012. At the 18th Party Congress, Hu Jintao elevated "building China into a maritime great power"[22] to the same rank as achieving a "moderately prosperous society."[23] He defined it expansively: exploiting ocean resources, growing a world-class maritime economy, protecting the marine environment, and "resolutely safeguarding China's maritime rights and interests."[24] Xi Jinping, taking power months later, made the ideological stakes explicit: maritime greatness, he stated, is the most visible proof that Chinese socialism has not only survived but triumphed, deserving global admiration and deference.[25]

Since Xi took the helm in 2013, he has carried the Maritime Great Power agenda into the PRC's wider statecraft—launching the "Blue Economy"[26] and "Ecological Civilization"[27] campaigns to designate millions of square kilometers as "blue territory," embedding the strategy in the Maritime Silk Road[28] and the "Maritime Community of Shared Future,"[29] and centralizing major maritime agencies under Party and military control to coordinate economic and coercive power at sea.[30] As recently as March 2025, senior officials convened distant-water fishing companies to implement Xi's maritime directives, emphasizing its role in "displaying the image of a responsible nation" while maintaining "zero tolerance" toward illegal fishing and "strictly controlling" fleet size.[31]

The Instrument: China's Distant-Water Fishing Fleet

Distant-water fishing became one of Beijing's earliest tools for projecting maritime power, predating and ultimately serving the formal Maritime Great Power agenda. Understanding how the fleet works requires understanding how the CCP directs it and what it is designed to accomplish. Beijing uses subsidies, state-owned enterprises, regulatory control, and overseas basing to build and direct the fleet at scale—then deploys it to advance diplomatic leverage, collect intelligence, and conduct coercive operations in contested waters.

Building and Directing the Fleet

The PRC's distant-water program began in 1985 with just 13 trawlers off Guinea-Bissau;[32] by the late 1990s and 2000s, new five-year plans[33] and the world's largest subsidy regime—about $7.2 billion in 2017, far more than any other nation[34]—had scaled the pilot program into thousands of steel-hulled vessels, with estimates ranging from 2,000 officially registered to more than 16,000 when militia-linked and foreign-flagged PRC craft are included.[35] Alongside state guidance and financing, Beijing pushed infrastructure-for-access deals, which trades port and processing investments for fishing rights, to lock in overseas basing, expand operational control, and secure permissive political environments for its fleet.[36] This maritime force—more than triple the combined

fleet size of Taiwan, Japan, South Korea, and Spain— drove about 44 percent of the global fishing effort between 2022 and 2024,[37] logging over 110 million hours in the waters of more than 90 countries.[38]

The PRC's fisheries system is run primarily through the Ministry of Agriculture and Rural Affairs (MARA), whose Bureau of Fisheries oversees national policy, licensing, enforcement, and data collection. But the system is far from cohesive: provincial and local marine bureaus hold broad autonomy in authorizing fishing, administering subsidies, and enforcing rules—creating persistent friction with Beijing's top-down directives and allowing regional governments to compete for fleets, investment, and subsidies.[39] Key industry bodies—most notably the China Overseas Fisheries Association[40]—collect operational data and support compliance, with senior MARA officials holding leadership posts in these groups, reinforcing direct state oversight. Within this structure, central state-owned enterprises operate as the Party's executors abroad, building the overseas projects, partnerships, and footholds that expand the DWF fleet's reach and anchor it within the PRC's broader geopolitical agenda.[41]

The Fleet's Strategic Functions

When a system elevates party-state objectives above individual rights, other nations' sovereignty, and international law, economic activity becomes inseparable from state power. The PRC's DWF operates within exactly this framework. As the Office of Naval Intelligence notes, "[m]any nations employ DWF fleets in pursuit of food security and economic gain, but the PRC is the only nation that also utilizes its DWF fleet as an extension of its official maritime security forces," enabling Beijing to establish presence, influence political conditions, collect operational intelligence, and advance sovereignty claims long before its gray hulls arrive.[42] The CCP has transformed what appears to be a commercial fishing fleet into a strategic instrument that serves two complementary functions: as a diplomatic tool Beijing can activate or withdraw to manage foreign tensions, and as a coercive platform that extends the PLA's capabilities far beyond the PRC's territorial waters.

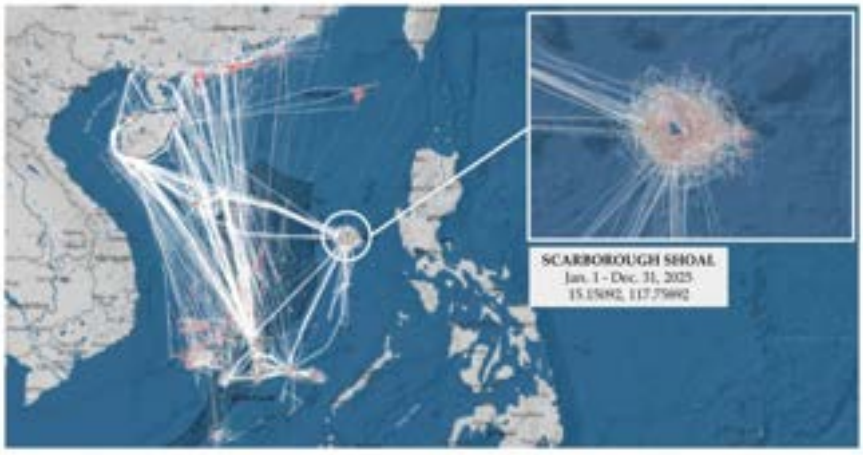
Diplomatic Control & Image Management. On the diplomatic front, Beijing exercises direct operational control over the DWF's fishing operations to manage tensions with foreign governments. Ahead of the 2018 G20 Summit in Argentina, Beijing issued a directive ordering its entire DWF fleet to retreat from foreign exclusive economic zones "to establish the image of a responsible major power and prevent foreign-related violations during the G20 Summit."[43] The order openly acknowledged Beijing was pulling back vessels to manage diplomatic optics after repeated confrontations with Argentine authorities had threatened to embarrass the PRC on the world stage.[44]

A similar pattern emerged in June 2020 when 300 PRC vessels arrived near Ecuador's Galapagos Islands—a United Nations Educational, Scientific and

Cultural Organization World Heritage Site that once inspired Charles Darwin's theory of evolution.[45] Despite the vessels remaining in international waters, international outcry prompted Beijing to announce fishing moratoriums near the Galapagos and off the coast of Argentina.[46] Hundreds of vessels departed, again demonstrating Beijing's direct control over fleet movements, though most simply relocated to continue fishing outside Peruvian waters.

Military Mobilizaiton & Intelligence Collection. The integration of fishing into military operations is most explicit across the PRC's maritime periphery—the Bohai Gulf, Yellow Sea, East China Sea, and South China Sea. Here, PRC trawlers operate as a maritime militia, formally the People's Armed Forces Maritime Militia (PAFMM), a state-directed force of civilian mariners mobilized under local PLA commands and ultimately subordinate to the Central Military Commission.[47] In 2023, the maritime militia averaged 195 vessels per day around key South China Sea features, a roughly 35 percent increase from the prior year.[48] The scale and persistence of this activity continued to expand in 2025—advancing PRC "maritime rights and interests" through dense militia clustering around contested features such as Scarborough Shoal.

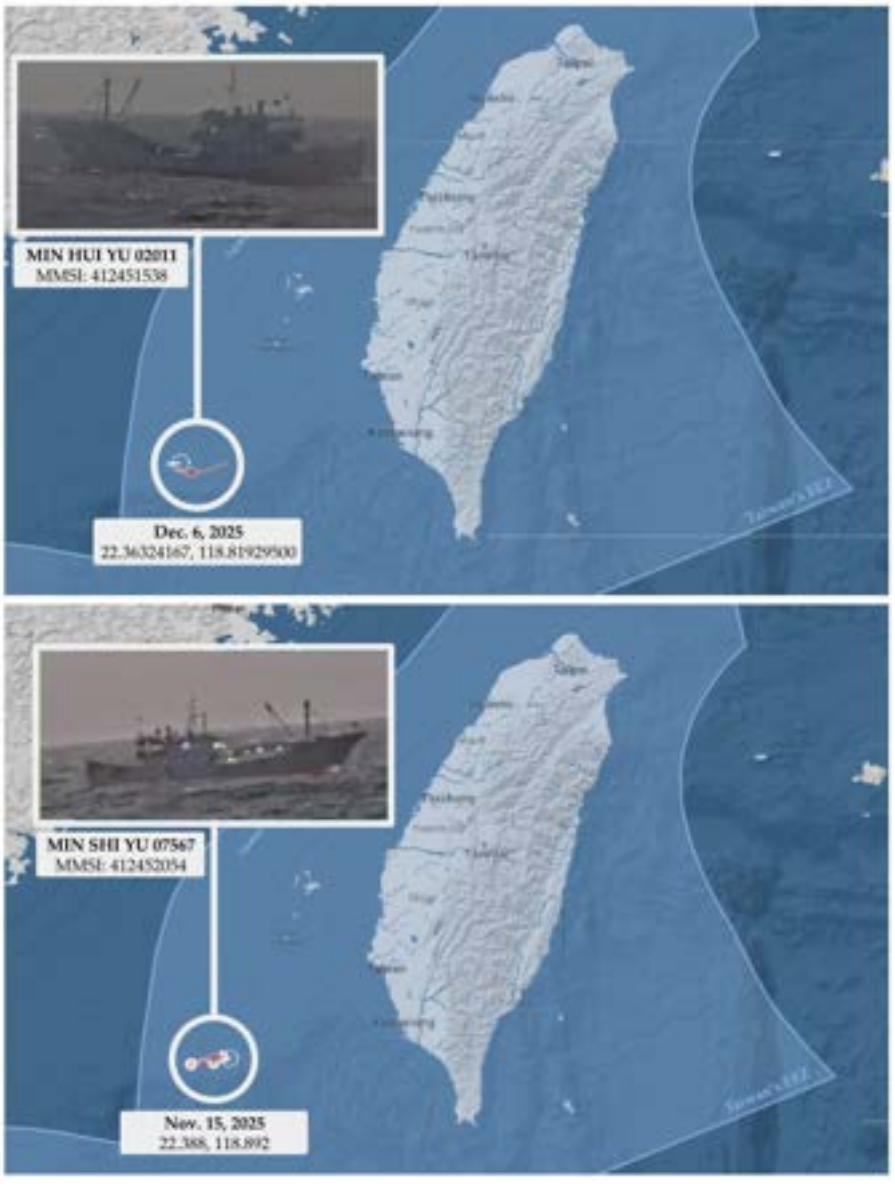
Maritime Militia Movements from Jan. 1 through Dec. 31, 2025



Maritime militia vessel movements between January 1 and December 31, 2025, showing transit routes and concentrated clustering in contested areas like the Scarborough Shoal. Sources: CSIS; Starboard Maritime Intelligence

Maritime militia vessels are purpose-built or modified for coercive tasks—reinforced hulls and water cannons are documented features—and their intelligence mission is explicit: specialized reconnaissance elements track foreign naval activity and relay reporting to fill PLA maritime surveillance "blind spots."[49] Such persistent presence would be directly relevant in a Taiwan contingency. Vessel-tracking data and imagery have already documented PRC or suspected PRC fishing vessels operating illegally inside Taiwan's exclusive economic zone.[50]

Illegal Chinese "Fishing" in Taiwan's EEZ



Examples of two maritime militia vessels transiting illegally within Taiwan's EEZ. Sources: Quartermaster; Starboard Maritime Intelligence

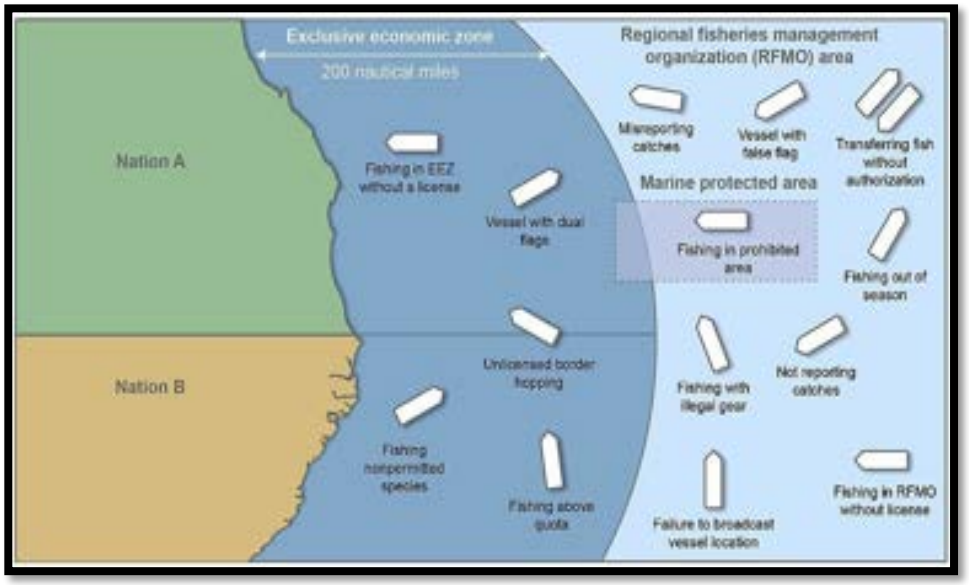
While the maritime militia is currently known to operate in the PRC's "Near Seas," PLA sources now identify the DWF fleet as a platform for placing "information personnel" on far-seas voyages.[51] This is a practice reflected in Zhoushan's emerging "far-seas policing" model, which embeds Party cells and security stewards aboard outbound vessels to maintain discipline and reporting.[52] Beijing is also equipping DWF vessels with increasingly capable satellite and cluster-based communications systems,[53] positioning parts of the fleet as mobile data nodes that support wider maritime sensing and connectivity

architectures consistent with Beijing's Blue Ocean Information Network, a state-directed ocean-monitoring architecture that fuses fixed reef stations, floating platforms, and underwater sensors to give Beijing persistent visibility across key sea lanes.[54]

Operational Reality: How the Fleet Functions in Practice

Beijing's DWF fleet's operations reveal a system where state backing enables predatory behavior at unprecedented scale. This manifests in three domains: economic predation, human exploitation, and environmental destruction. Built and backed by the state, this fleet has become a global engine of predation, and Beijing now leads the world in illegal, unreported, and unregulated fishing ("IUU fishing"). *Illegal* occurs when vessels operate in violation of applicable fisheries laws; *unreported* involves catch that has been unreported or misreported to the relevant national authority in contravention of applicable laws and regulations, blocking any ability to track catch, taxes, or stock health; and *unregulated* fishing refers to fishing in areas where no management rules exist or by vessels that evade existing regulatory frameworks, placing activity effectively beyond oversight.[55] Much of this activity unfolds in two areas: the exclusive economic zones (EEZs) of developing states—waters extending up to 200 nautical miles from their coastlines where they hold sovereign rights over fisheries and other resources—and the high seas beyond any national jurisdiction, where weak monitoring and enforcement let DWF fleets operate with near impunity.

Types of Illegal, Unreported and Unregulated Fishing



Source: GAO

While IUU fishing is not unique to any one country, the PRC's DWF fleet is categorically different from others in scale, sophistication, and strategic intent.

Many nations have vessels that engage in illegal or abusive practices. No other state combines the PRC's massive fleet size, industrial capacity, advanced vessel technology, centralized political control, and sustained state subsidization into a single, globally deployed system. The result is not sporadic misconduct, but a coherent operating model that allows abuses to occur at industrial scale and with remarkable resilience to enforcement pressure. These activities are not incidental; they are embedded in Beijing's broader grand strategy to project power, secure protein supply chains, and normalize a permanent Chinese presence in contested and weakly governed maritime spaces.

Economic Predation

The economic damage is staggering: tens of billions of dollars drained from coastal economies, global markets flooded with cut-rate illegal catch, and the world's poorest regions left to absorb the damage.[56] Africa loses an estimated $11.2 billion a year—$9.4 billion in West Africa alone—as PRC trawlers strip local waters, destroy seabeds, and remove the fish that millions of coastal families depend on not only for income but for their primary source of protein.[57] Central and South America face similarly severe losses, with IUU fishing driving up to $2.3 billion in economic damage, $600 million in lost income, and roughly $500 million in lost tax revenue.[58]

Human Exploitation and Trafficking

The human toll runs parallel. Thousands of migrant men from Asian, Africa, and other regions are recruited or deceived onto PRC distant-water vessels—trafficked through false contracts, debt, and coercive brokers—and then held in conditions that meet the legal threshold for slavery: no freedom to leave, round-the-clock work, violence and threats, deliberate denial of food and medical care, and deaths treated as a cost of doing business.[59] In documented cases, officers have dumped sick or dead crew overboard to hide abuse.[60] Under international law, trafficking describes how people are recruited and moved; slavery describes the ownership-like control they face aboard.[61] The PRC's fleet now exhibits both.

Environmental Destruction

The environmental cost runs parallel. PRC vessels have destroyed more than 104 square kilometers of South China Sea coral reefs using explosives, chemicals, and industrial pumps to extract illegal giant clams—wiping out the reef systems that support regional fisheries and buffer coastlines.[62] In the Spratly's, over 200 PRC vessels dumped an estimated 2,596 pounds of sewage a day into fragile waters, producing pollution plumes visible from space.[63] And, in West Africa, PRC-owned fishmeal plants in The Gambia released untreated wastewater laced with arsenic and phosphates into local fishing grounds, contaminating the waters communities depend on and causing documented skin injuries to Gambians.[64]

Fisheries Crime

These human and environmental abuses are not accidental side effects—they are the predictable outcome of a state-enabled system. As the world's leading perpetrator of illegal, unreported, and unregulated (IUU) fishing, Beijing sits at the center of a global "fisheries crime" ecosystem.[65] Beijing's model systematically erases the line between licit and illicit activity. In this ecosystem, vessels with valid licenses simultaneously traffic coerced labor; ships reporting legal catch engage in covert transshipment and smuggling; and companies receiving state subsidies utilize shell subsidiaries to launder proceeds.[66] What distinguishes the PRC is not merely the presence of abuse, but the institutionalization of these practices. By shielding this fleet with political power, economic leverage, and regulatory arbitrage, Beijing has created a structure that is simultaneously commercial and criminal. In effect, the PRC is presiding over the world's largest transnational criminal enterprise at sea.

U.S. Leadership in the Global Response

The PRC's DWF fleet operates across borders, markets, and jurisdictions, intersecting with a global governance system the U.S. and its democratic allies and partners have shaped for decades. Long before the PRC expanded offshore, the U.S. developed a wide range of domestic laws, international commitments, enforcement partnerships, and transparency tools that together anchor modern fisheries governance. This framework—built around treaties, monitoring regimes, bilateral agreements, and science-based management—forms the legal landscape the PRC now navigates, exploits, and, at times, violates.

For more than a century, the Lacey Act has supplied core authority to bar the import or sale of seafood taken in violation of foreign or international law. Its broad fisheries provisions serve as the historical anchor of U.S. efforts to treat illegal seafood trade as an enforceable offense. Congress expanded this foundation with the High Seas Driftnet Fishing Moratorium Protection Act in the early 1990s[67] and strengthened international enforcement tools in 2006 through the Magnuson–Stevens Reauthorization Act, which increased federal capacity to identify offending nations and pursue stronger compliance abroad.[68] The USCG enforces these authorities at sea, patrolling U.S. waters and the high seas to intercept vessels suspected of using illegal driftnets, seize prohibited gear, and take law enforcement action against violators.

In 2018, following congressional direction, the National Oceanic and Atmospheric Administration (NOAA) implemented the Seafood Import Monitoring Program (SIMP) to require traceability for designated high-risk seafood imports.[69] In 2019, Congress passed the Maritime Security and Fisheries Enforcement (SAFE) Act, establishing the U.S. Interagency Working Group on IUU Fishing and directing federal agencies—including the Departments of State, NOAA, and the Coast Guard—to improve coordination with partner nations and enhance transparency and enforcement tools.[70] The Maritime SAFE Act Working

Group now coordinates twenty-one federal departments and agencies to curtail the global trade in seafood derived from IUU fishing, including its links to forced labor and transnational organized crime.

Within this framework, the U.S. Coast Guard (USCG) serves as the nation's lead agency for at-sea enforcement of fishery conservation on the high seas. As the only federal entity with the authority, global reach, and operational infrastructure to maintain a sustained law enforcement presence across the U.S. EEZ and in key areas of the high seas—including nearly all regions where the PRC's DWF fleet operates—the USCG is uniquely positioned to confront vessels engaged in IUU fishing and uphold the rule of law at sea.

This combination of robust legal mandates, rigorous NOAA science, and active USCG enforcement has yielded measurable results. Since 2000, the U.S. has rebuilt fifty overfished stocks, reduced overfishing to a historic low, and maintained one of the world's most effective, science-based fisheries management systems—supporting millions of jobs and hundreds of billions of dollars in economic activity.[71]

That record also gives the U.S. credibility in advancing international law: although not a party to the United Nations (UN) Convention on the Law of the Sea (UNCLOS), the U.S. recognizes its core provisions as customary international law and applies them in practice. The U.S. is also party to the Port State Measures Agreement[72] and the 1995 UN Fish Stocks Agreement,[73] participates in multiple regional fisheries management organizations (RFMOs),[74] and provides sustained leadership in Food and Agriculture Organization (FAO) negotiations and World Trade Organization (WTO) subsidy disciplines.

This framework is bolstered by fifteen bilateral shiprider agreements,[75] primarily concentrated in the Indo-Pacific, where recent "enhanced" provisions have significantly strengthened regional security.[76] These efforts are further amplified by U.S.-led initiatives such as the Oceania Maritime Security Initiative (OMSI),[77] the Partners in the Blue Pacific (PBP),[78] and the Indo-Pacific Partnership for Maritime Domain Awareness (IPDMA).[79] Together, these programs expand cooperative surveillance and enforcement, positioning the U.S. as the essential coordinator in the fight against illegal fishing.

The USCGC Harriet Lane (WMEC-903) serves as the flagship model for this capacity-building approach. Following a 2023 service-life extension, the Harriet Lane was redesignated as a dedicated Indo-Pacific Support Cutter. Its sole mission is to work "by, with, and through" allies to promote good maritime governance across Oceania. By providing a persistent presence and a platform for partner-nation shipriders, the Harriet Lane bridges the gap between high-level policy and on-water enforcement, demonstrating a uniquely American model of collaborative leadership.

The U.S. also champions labor protections at sea, supporting the International Labor Organization's forced-labor conventions—including the 1930 Forced Labor Convention,[80] the 1957 Abolition of Forced Labor Convention,[81] and the sector-specific Work in Fishing Convention[82]—and the UN convention protecting migrant workers.[83] U.S. engagement within RFMOs increasingly incorporates crew-welfare and labor-standards discussions alongside conservation measures,[84] and federal authorities apply the UN trafficking-in-persons protocol[85] and UN guidance on migrant smuggling at sea[86] to address forced labor, trafficking, and unsafe irregular maritime movement.

Against this backdrop, the PRC's distant-water system stands out because it does not conform to these rules—it exploits them. By blending commercial activity with state direction, masking military and intelligence functions, and operating across the seams of overlapping jurisdictions, the PRC uses illegal, unreported, and unregulated fishing to project influence, distort markets, spur transnational crime, and stress the very enforcement structures other nations rely on.

PART II: FINDINGS

Finding: China Built a Global System That Removes Distance as a Limit on Extraction

International fisheries enforcement assumes vessels must eventually return to port—creating opportunities for inspection, documentation, and oversight. Beijing systematically eliminated that assumption. Through offshore logistics networks, satellite command systems, legal structures that convert foreign operations into domestic arrangements, and infrastructure that channels catch through terminals beyond regulatory reach, Beijing built a self-contained extraction system that operates indefinitely at sea. The result is a fishing fleet that faces neither the economic constraints that force unprofitable operations to cease nor the regulatory chokepoints that enforcement depends on.

Distant-water fishing requires refueling, resupply, crew rotation, and transshipment—functions normally performed in port under inspection. The PRC built a global structure to perform those same functions offshore. Reefers and tankers meet vessels at sea; floating bases handle emergencies and maintenance; overseas ports provide landing and processing capacity under Chinese control; and satellite communications link the system to Beijing.

Off the coast of South America, Chinese squid jiggers work under blazing lights while state-linked refrigerated carriers collect catch; in West Africa, trawlers operating under local flags are resupplied at sea; near the Galápagos, longliners rendezvous with transshipment vessels. These activities allow fleets to fish continuously in the world's most productive waters while avoiding inspection and reporting requirements.

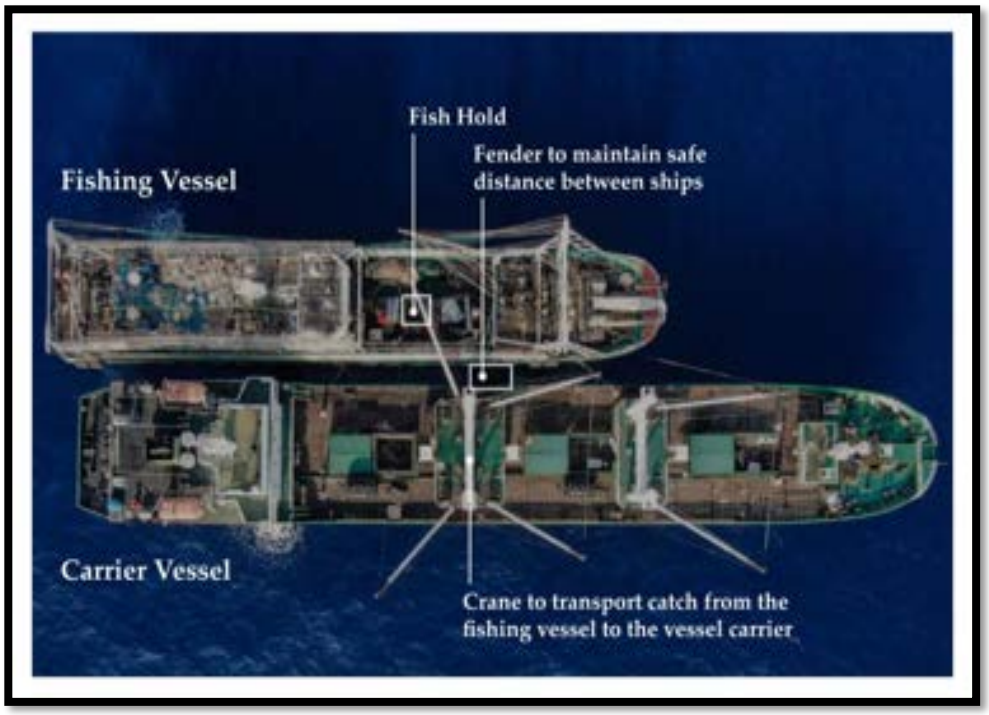
The Committees identified these patterns by analyzing AIS transmission data from Global Fishing Watch and Starboard Maritime Intelligence between January 1, 2024 and January 1, 2025, tracking vessels based on speed and proximity to identify likely meetings at sea.[87] As detailed below, this global survey of transshipment and bunkering activity across all jurisdictions demonstrates the disproportionate scale of PRC operations compared to other distant-water fishing nations, with the PRC serving as both the primary enabler and beneficiary of these at-sea support services. Together, this evidence reveals an extensive, state-supported sustainment network that enables the PRC's DWF fleet to operate as a self-contained global extraction system.

Reefers

Reefers—refrigerated cargo ships—are the linchpin of distant-water fishing, transforming what would be weeks-long fishing trips into operations lasting months or years at sea. These specialized vessels facilitate transshipment: the direct transfer of fish from fishing vessels to cargo ships without ever recording it as landed, along with associated transfers of fuel, supplies, and crew. By offloading catch at sea and continuing to fish, vessels consolidate fuel costs within a fleet and move product to market more quickly. A single reefer can collect the harvest of multiple fishing vessels before delivering consolidated cargo into port.

Transshipment is common across global fisheries and, when properly regulated with independent observers and catch documentation schemes, can be legitimate. Reefers possess derrick and crane superstructures enabling them to conduct transshipment both at sea and in port, distinguishing them from smaller support vessels like fish tenders or well boats that typically operate within national waters closer to shore.[88] By eliminating the need for long, fuel-intensive port calls, reefers allow fishing fleets—particularly distant-water squid and tuna fleets—to remain continuously at sea, often beyond the practical reach of port-based inspection regimes and transparency measures.

Transshipment Enables Year-round Operation at Sea



In the North Indian Ocean, a squid fishing vessel and a carrier ship come alongside to conduct an at-sea transshipment. Fenders hold the vessels apart as a crane lifts catch from the fishing boat's hold to the carrier, enabling the fishing fleet to stay on station for extended periods. Sources: Food and Agriculture Organization; Greenpeace; The New York Times

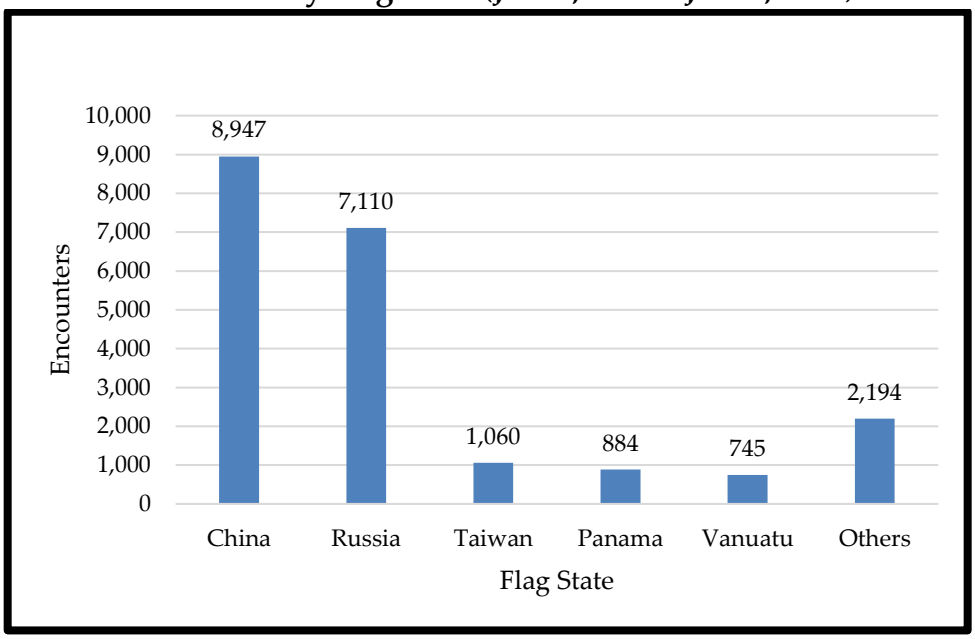
The problem is that transshipment occurring out of sight creates multiple avenues for abuse: vessels "go dark" by disabling AIS tracking to hide transfers; operators mix illegally caught fish with legal product; crews are held hostage at sea for months without oversight; and fish moves through multiple transfers—both at sea and in port—and containerization across countries, making origins nearly impossible to trace and illegality difficult to prove.[89]

Compounding these enforcement challenges, roughly 45 percent of carrier vessels change identifying characteristics such as name, flag state, call sign, or Maritime Mobile Service Identity (MMSI) over time, sometimes repeatedly, frustrating vessel tracking even where IMO numbers exist.[90] In regions with strong fisheries management like North America and Europe, transshipment is tightly regulated or rare,[91] but in regions with higher levels of illegal fishing—particularly West Africa, parts of the Indian Ocean, and along certain EEZ boundaries—transshipment is far more prevalent and poorly monitored, amplifying risks to coastal state sovereignty.[92]

While transshipment occurs across global fisheries, the PRC has industrialized these risks at unprecedented scale. Between January 2024 and January 2025, AIS data recorded 10,830 carrier-fishing encounter events worldwide, involving 2,766 vessels operating under 42 different flags. Encounter activity was heavily concentrated: vessels flagged to the PRC accounted for 8,947 encounters—83 percent of global transshipment activity. Russia came second

with 7,110 encounters, followed by Taiwan (1,060), Panama (884), and Vanuatu (745).[93]

Encounters by Flag State (Jan. 1, 2025 – Jan. 1, 2026)



The PRC's dominance extends beyond raw encounter volume to fleet scale. Of the 2,766 vessels involved in carrier-fishing encounters, 1,243 were flagged to the PRC—45 percent of all vessels participating in the global at-sea transfer network. By comparison, 453 vessels were flagged to Russia, about 16 percent of the total, indicating that the PRC stands out not only for encounter frequency but also for the sheer number of vessels it deploys.

The concentration intensifies at the individual vessel level. Just 55 vessels—2 percent of the global fleet—accounted for 5,409 documented encounters, nearly half of all transshipment activity recorded during the year. Of these high-activity vessels, 29 were flagged to the PRC, 14 to Russia, 6 to Panama, 3 each to Vanuatu and Taiwan, and 1 each to Turkey and South Korea. A small, predominantly PRC-flagged subset of reefers sits at the core of global transshipment.

Open registries amplify Beijing's control while obscuring it. During the same period, 33 vessels flagged to Vanuatu accounted for 745 encounters, while 28 vessels flagged to Panama accounted for 884 encounters. Beneficial ownership analysis reveals that 26 of the 33 Vanuatu-flagged vessels and 12 of the 28 Panama-flagged vessels were ultimately under PRC ownership. Open registries decouple flag-state oversight from underlying ownership and operational control, allowing PRC operators to evade scrutiny while maintaining command. Observed reflagging patterns following enforcement actions—most notably

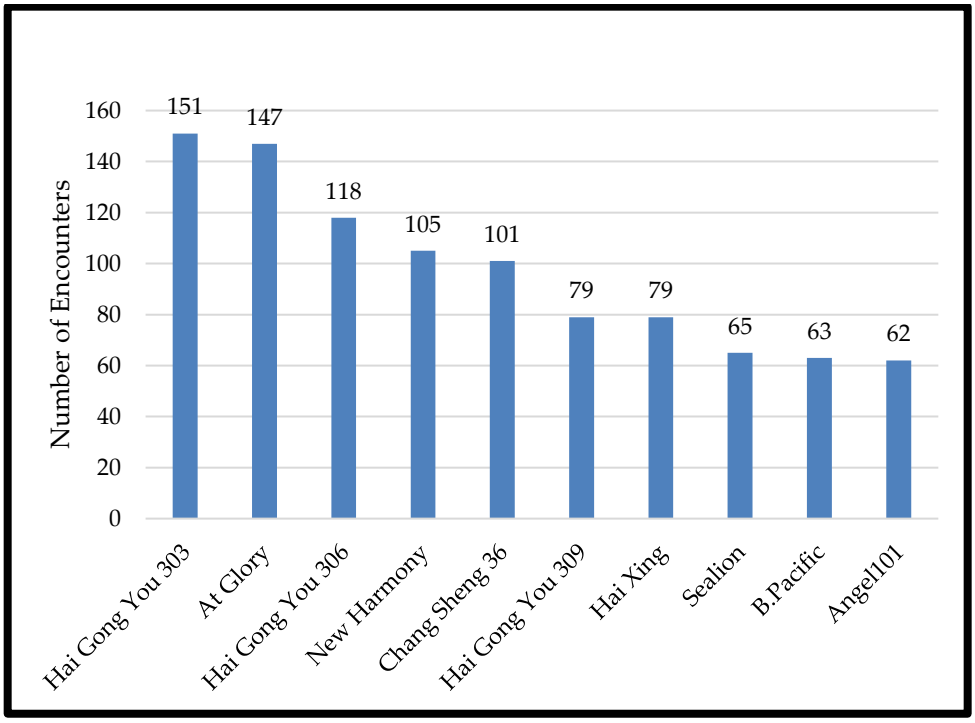
shifts from Panama to Vanuatu—further underscore how high-risk operators use open registries to sustain operations despite increased pressure.[94]

Tankers

Tankers—vessels equipped to refuel, or "bunker," other ships at sea—form the second pillar sustaining the PRC's DWF fleet in offshore waters. These vessels allow fishing boats to rendezvous on the high seas for direct fuel transfers, eliminating the need to return to port for refueling or inspections. Tankers play a critical but underregulated role in supporting DWF fleet operations. Unlike transshipment activities involving reefers, which RFMOs require be reported in some form, bunkering operations face no consistent international reporting requirements. This regulatory gap allows tankers to support DWF fleets globally with little record of encounters.[95]

AIS analysis of ship-to-ship transfers between January 2025 and January 2026 identified 1,479 bunker-related encounter events worldwide involving 38 tankers and 808 fishing vessels operating under 52 different flags. The top 10 tankers accounted for 899 encounters, representing 61 percent of all global bunkering activity, while the remaining 28 tankers conducted only 580 encounters. Chinese-flagged vessels featured prominently in this network. The leading vessel was the Panama-flagged Hai Gong You 303 with 151 encounters, followed by At Glory with 147 encounters under the Panama flag and Hai Gong You 306 with 118 encounters under the Liberian flag. Furthermore, open registries dominate: of the top 10 tankers, eight operate under Panama, Liberia, or Vanuatu flags, and one each under the Marshall Islands and Greece—jurisdictions that decouple flag-state oversight from underlying ownership and operational control.

Top Ten Encounters by Tanker (Jan. 1, 2025 – Jan. 1, 2026)



Ownership and management structures further obscure accountability. Several high-activity tankers operate through single-vessel companies and layered shell or subsidiary structures, often using open registries and offshore corporate arrangements. These structures can conceal beneficial ownership, mask interfleet relationships, and complicate enforcement actions aimed at the ultimate financial beneficiaries. Within the top 10 tankers, Hai Gong You 303 and Hai Gong You 309 are linked to Wuhan Yidon Shipping Management (Wuhan Yidon); Hai Gong You 306 also shows a Wuhan Yidon linkage through prior ownership. Hai Gong You 309 further traces to China National Fisheries Corporation, the state-owned enterprise associated with broader PRC distant-water fishing infrastructure. At Glory, New Harmony, and Angel 101 are managed by Taiwan-based Jie Sheng Ship Management Ltd. and were previously owned by Winson, a company with documented sanctions-evasion ties.[96] The remaining vessels show ownership linked to Singapore, South Korea, Hong Kong, and Greece. The remaining vessels reflect a more globally distributed set of owners and managers tied to Hong Kong, Singapore, South Korea, and Greece-linked entities.

These fishing-fleet tankers share operational characteristics with what is often referred to as the "shadow fleet"—vessels that engage in deceptive maritime practices to evade oversight—but serve a different function. The shadow fleet primarily consists of vessels transporting sanctioned crude oil and petroleum products to circumvent international sanctions, particularly from Russia, Iran, Venezuela, and North Korea.[97] The shadow fleet is primarily associated with transporting sanctioned crude oil and petroleum products to

circumvent international sanctions, particularly involving Russia, Iran, Venezuela, and North Korea. Fishing-fleet tankers, by contrast, refuel fishing vessels at sea. The behaviors overlap—AIS manipulation, concealed ownership, covert transfers—but the cargo and strategic purpose differ.

Floating Bases

Floating offshore fishery bases—select squid jiggers repurposed as multifunctional support vessels—complete the system.[98] Unlike traditional hospital ships registered as medical facilities, these vessels are registered as fishing boats but provide medical care, logistical resupply, operational coordination, and crew transfers.[99] When a fishing vessel has a sick, injured, or dead crew member, the base sails to the location, receives the crew member via zipline transfer that takes only minutes, and returns them to port while the fishing vessel continues operating. The transfer itself is rudimentary: crew members are moved between vessels using an improvised system of ropes and pulleys suspended over open water, a process that can take time and worsen a patient's condition.[100]

Transporting Crew at Sea

Crew transferred by steel cable from Yonghang 3 to Zhe Pu Yuan 98, August 13, 2021.[101]

Crew transferred by crane lift from Ming Xiang 803 to Zhe Pu Yuan 98, February 22, 2021.[102]

Transfer of a crew member between two vessels using a homemade system of ropes and pulleys.

Crew transferred by sling net from the Zhe Puyuan 58 to the Zhe Pu Yuanr 98, December 9, 2024.[103]

Port authorities do not record which vessel each crew member came from, making it impossible to investigate the incident, inspect the originating

vessel, or hold operators accountable. Chinese media report that these vessels have treated over 1,000 patients at sea and transported critically ill crew to port more than 50 times.[104] Public reporting further indicates that they coordinate and monitor fleet activities, mediate crew disputes, oversee maritime security management, and provide towing and search-and-rescue support.[105]

At least two such vessels operate off South America: the Zhe Pu Yuan 98 and the Pu Yuan 801, both officially registered as squid fishing boats but functioning as floating bases. Both vessels belong to the company Zhoushan Putuo Ocean Fishery Co., Ltd., which owns a fleet of 25 squid vessels and operates from Zhoushan port.[106] There is no precedent for a hospital-type ship operating in the South Pacific Regional Fisheries Management Organization (SPRFMO) convention area; it lacks a regulatory framework establishing its correct operation in the squid fishery, creating an unregulated system that allows vessels to exploit the situation by using the floating hospital to evade port inspections.

The Zhe Pu Yuan 98 has operated across three distinct voyages. During its first voyage from August 2017 to July 2020,[107] the vessel functioned as a conventional squid jigger with a crew of 25, fishing off Peru for 1,055 days and visiting Callao port only once. After maintenance at Zhoushan shipyard, it embarked on its second voyage in March 2021. According to Zhejiang province media reports, the vessel had been transformed into a "comprehensive fishery support ship"—retrofitted with a small operating room, blood-testing equipment, video-conferencing capabilities for consulting with doctors in the PRC, and a single physician serving a fleet of approximately 260 squid ships comprising roughly 12,000 crew members.[108] During this 779-day voyage from March 2021 to May 2023,[109] the vessel made ten emergency port entries to Callao and disembarked 13 fishermen in critical condition. Port inspection documents recorded that in some cases, crew members arrived expelling blood from their mouths or with lacerated ligaments.[110] The vessel began its third voyage in July 2023 and returned to Zhoushan port in July 2025.[111] The Zhe Pu Yuan 98 has been authorized to operate as a fishing vessel, but not to function as a floating hospital.[112]

The Pu Yuan 801 preceded the Zhe Pu Yuan 98 as a floating hospital.[113] Between 2016 and 2020, the vessel operated in the Southeast Pacific Ocean, treating nearly 300 crew members and escorting more than 20 critically ill crew members to Peruvian ports across 34 recorded port entries.[114] Chinese media reports from March 2018 describe the vessel as a "production command ship" equipped with a fishery law enforcement officer, a maritime security management officer, a deputy chief physician, and remote video consultation capabilities linked to Zhoushan Network Hospital.[115] The vessel established a dedicated interrogation room with a hotline to the Shenjiamen Border Police, conducted safety inspections of over 70 distant-water fishing vessels, and completed more than ten rescue missions for distressed vessels, transporting 350 crew members in and out of port and treating

71 crew members at sea.[116] In four instances, the vessel escorted five foreign critically ill patients back to port for treatment. In 2021, the Zhe Pu Yuan 98 replaced the Pu Yuan 801. After 2021, the Pu Yuan 801 relocated to the North Pacific Fisheries Commission convention area, where it currently operates around Japan's high seas.[117]

Security Services Aboard Chinese Support Vessels

Crew distributing safety manuals aboard the *Pu Yuan 801* vessel.[118]

Crew treat and assist injured fishermen aboard the *Zhe Pu Yuan 98*.[119]

Together, these three vessel types eliminate the "moment of leverage" the Agreement on Port State Measures (PSMA) depends on. The treaty assumes vessels must enter port to land its catch or refuel. The PRC removed that assumption. If a fleet can offload catch, take on fuel, rotate crew, restock supplies, and manage medical emergencies without ever docking, then the legal framework has nothing left to regulate.

Ports

While the offshore network eliminates the need for most port calls, vessels must eventually land catch, access shipyards, and interface with coastal state authorities. The PRC constructed a land-based system that mirrors the offshore strategy: state investment built the physical infrastructure, while private intermediaries control the operational interfaces that determine what information reaches regulators and what accountability mechanisms apply. The result is a global network of forward operating bases that keep the fleet at sea indefinitely while circumventing international treaty obligations designed to prevent exactly this outcome.

In 2017, the same year WTO members concluded negotiations explicitly prohibiting subsidies for vessels engaged in illegal fishing or contributing to overcapacity, the CCP's 13th Five-Year Distant-Water Fishery Development Plan redesignated distant-water fishing as "strategic infrastructure" and authorized subsidies covering up to 30 percent of investment costs for firms establishing

"overseas comprehensive fishery bases."[120] Provincial governments in Fujian and Zhejiang—home to the PRC's largest fishing fleets—immediately added funding for joint ventures, vessel reflagging programs, and "go-abroad" initiatives embedding Chinese operations within foreign exclusive economic zones. The WTO agreement prohibits subsidies for fuel, vessel construction, and port operations that enable overcapacity. The PRC reclassified those exact expenditures as Belt and Road infrastructure investment, which the WTO does not regulate. The spending serves identical purposes. The reclassification removes it from treaty jurisdiction.

Mauritania demonstrates how the reclassification enabled construction at extraordinary scale and speed. Hongdong International—a subsidiary of China Poly Group Corporation, a state-owned defense conglomerate—received financing for a $100 million fisheries complex at Nouadhibou including deepwater port facilities, industrial-scale cold storage, fish processing plants, vessel repair yards, and crew accommodation. The complex services 169 licensed Chinese vessels and provides infrastructure enabling year-round operations without returning to the PRC. Between 2017 and 2020—the three years immediately following the PRC's signing of PSMA—Nouadhibou rose from fifth to first globally in foreign fishing vessel traffic, a more than threefold increase driven entirely by Chinese landings. The Mauritania model then replicated globally.

In Ghana, $50 million funded complete redevelopment of Jamestown fishing village into a modern port and processing complex. In Guinea-Bissau, which is not a PSMA party, China National Fisheries Corporation operates Banting Highlands Fishing Port and an $8 million processing plant handling 30,000 tons of catch annually while managing fifteen trawlers fishing under Guinea-Bissau access agreements. In Sierra Leone, a 2021 infrastructure deal financed construction of a new fishing harbor and fishmeal processing factory. In Papua New Guinea, the China National Fisheries Corporation built processing plants in Madang and Lae that now serve as permanent landing points for the Chinese tuna fleet. Identical facilities—Chinese-financed, Chinese-built, Chinese-operated—either operate or are under development in Ecuador, Morocco, Gabon, Côte d'Ivoire, Senegal, Fiji, and Guyana, with additional projects planned across every major region where the PRC DWF may sail.

These bases enable operations that commercial ports cannot support. Each provides catch processing, cold storage, fuel, provisions, repairs, crew rotation, and medical facilities—everything vessels need to remain at sea indefinitely. A Chinese trawler can fish West African waters for two years, landing catch at a Chinese-built terminal in Nouadhibou staffed by Chinese managers, where fish is processed in Chinese plants, frozen in Chinese storage, and shipped through Chinese logistics networks. The vessel never enters a port requiring PSMA inspection. It never appears in foreign port records. The catch never appears in landing statistics because private terminals face no reporting

requirements. The subsidies funding these operations appear in Chinese budgets as Belt and Road infrastructure investment, not fisheries subsidies subject to WTO prohibition.

The WTO agreement aimed to prevent state subsidies from enabling vessels to fish beyond sustainable limits by removing economic constraints that would otherwise force unprofitable operations to cease. Beijing's response was to reclassify prohibited fisheries subsidies as infrastructure investment, move the spending offshore, and build bases that keep the fleet operating regardless of profitability. The reclassification delivers identical operational support while remaining invisible to treaty enforcement.

Technology

The PRC's offshore sustainment system rests on a state-directed satellite communications network built through legal mandates, technical standards, and coordinated implementation across multiple levels of government. In 2007, the Ministry of Agriculture established the Distant-Water Fisheries Information Service Platform—a centralized command-and-control system linking onboard terminals, maritime satellites, ground stations, and regulatory authorities.[121] This four-tier architecture delivers real-time positional and operational data to both regulators and fishing companies, creating a continuous feedback loop between vessels and the state.[122] Now the backbone of the PRC's global fishing fleet, the system extends into disputed waters, where the Ministry constructed 11 ground stations in the Spratly Islands and outfitted more than 600 vessels with BeiDou-enabled satellite equipment to maintain uninterrupted monitoring and control.[123]

The *2015 Measures for the Management of Distant-Water Fishing Vessel Position Monitoring* entrenched the system through binding ministerial regulation, compelling captains to transmit positions at least six times per day and placing all positional data under state ownership within the PRC's national data-security regime—treating fleet movements as strategic assets under direct government control.[124] In 2020, a national technical standard expanded this control by requiring every vessel to use approved Chinese satellite systems—BeiDou for two-way messaging and Tiantong for voice and broadband—ensuring every ship can be tracked, contacted, and directed from shore anywhere in the world.[125]

Together, these satellites form the command backbone of the PRC's DWF fleet. BeiDou terminals—now installed on more than 300,000 fishing vessels[126]—keep ships in constant contact with shore, allowing captains to send messages, report catches, and trigger emergency alerts to authorities, including for "mechanical trouble" or encounters with "foreign maritime agencies."[127] With a single push of a button, a vessel can transmit its coordinates and situation directly to Chinese authorities, giving Beijing instant visibility and control over its fleet anywhere in the world. Their importance was evident in 2014, when Chinese state media reported that Philippine authorities "turned off the BeiDou

system" aboard a Chinese fishing vessel detained in the Spratly Islands—a disputed account that nonetheless illustrated how Beijing's communications network binds its fishing fleet to state command and control.[128]

At the subnational level, the national system has been localized and expanded. In 2010 Hainan province launched an initiative to outfit fishing vessels with BeiDou.[129] It aimed to equip over 6,000 fishing vessels with Beidou by the end of 2012;[130] by the end of 2016, over 10,000 vessels had reportedly received the equipment.[131] After recent investments in navigation infrastructure, the PRC appears to have achieved 100 percent BeiDou coverage in the Paracel Islands, Spratly Islands, and other claimed areas.[132] In Zhoushan, authorities implemented the framework through municipal procurements equipping vessels with Beidou terminals, Tiantong satphones, and broadband systems supplied by Zhejiang Tongbo Technology Development Co., Ltd.—a state-linked enterprise specializing in marine-fishery communications and satellite integration.[133] Procurement records since 2018 confirm large-scale Beidou terminal contracts, establishing an integrated Beidou–Tiantong grid now covering most of Zhoushan's coastal fleet.[134] By 2020, Fujian province had installed non-removable BeiDou positioning terminals with independent power supplies on 6,500 large and medium-sized vessels.[135]

Within this network, encrypted platforms such as WeChat have become informal command channels that operate outside official oversight. A 2019 Supreme People's Procuratorate case from Penglai, Shandong, described WeChat "captains' groups" [船长群] to exchange patrol schedules and inspector sightings in real time, allowing vessels to scatter or go dark before boarding teams close in.[136] The case documented how these chats linked directly to shore coordinators transmitting warnings through Beidou short messages and Tiantong broadband, forming an integrated early-warning loop.[137] With Tiantong terminals now supporting voice, SMS, and WeChat data connectivity, the system has effectively created an encrypted mesh network at sea—linking hundreds of vessels, corporate dispatchers, and regulators in continuous communication.[138] The WeChat network does not just enable compliance monitoring; it sustains operations for months on end, ensuring logistical resilience, coordinated evasion, and immediate reporting back to state authorities.

The capability has played out on the high seas as well. In 2022, when the USCG Cutter *James* approached a group of Chinese squid vessels near the Galápagos for inspection, three ships broke formation and fled—one veering sharply toward the cutter to disrupt pursuit.[139] U.S. officials later assessed that the vessels had coordinated their maneuvers via Wechat, demonstrating how digital command links can synchronize evasion at sea.[140] The episode reflected a broader pattern: Chinese captains' systematic resistance to foreign inspection and Beijing's use of real-time communications to maintain strategic presence far from home waters. The PRC's subsequent diplomatic protest calling the operation "unsafe" and "unprofessional" signaled its ongoing effort to deter at-sea

enforcement, while its maturing Beidou–Tiantong architecture ensures that its DWF fleet remains visible, connected, and effectively self-sustaining across the world's oceans.[141]

Legal Constructs

The Port State Measures Agreement regulates "fishing vessels seeking entry into a designated port of a State other than its flag State"—meaning foreign vessels entering another country's ports. The treaty does not regulate domestic vessels landing in their own country's ports. The PRC exploited this distinction by converting foreign fishing operations into nominal domestic arrangements through two mechanisms: reflagging vessels to fly host-country flags, and negotiating bilateral agreements routing Chinese-flagged vessels to Chinese-controlled ports not designated for PSMA inspection.

Ghana is the clearest example. The PRC now controls at least 250 industrial fishing vessels registered under foreign flags globally, concentrated in West Africa, the Indian Ocean, and the Pacific—precisely the regions where Chinese port infrastructure is densest.[142] Roughly one-sixth of all distant-water fishing vessels worldwide have changed flags in the past decade.[143] The vessels did not change owners, they changed registration—suggesting a deliberate Chinese strategy to evade international scrutiny, skirt sanctions, and launder illegal fishing operations through proxy flags while locking down exclusive access to the world's richest fishing grounds.

Over 100 Chinese trawlers now operate under Ghanaian flags despite Ghanaian law explicitly prohibiting foreign ownership of vessels flying Ghana's flag.[144] The vessels are Chinese-built, Chinese-financed by Chinese state banks, captained by Chinese nationals, crewed predominantly by Chinese workers, managed by Chinese fishing companies, and land exclusively at Chinese-owned facilities. The only Ghanaian element is the flag—and that flag eliminates PSMA coverage. Ghana became a PSMA party in 2016 and was among the first 32 states to designate ports for international inspection by 2020, signaling apparent commitment to treaty implementation.[145] Yet the reflagged Chinese trawlers land at CNFC facilities including a 3,000-ton cold storage complex in Tema and the sprawling "Distant-Water Fishery Comprehensive Base" in Accra—both commercial terminals operated by Chinese companies for "development" purposes, not government-designated ports subject to PSMA inspection requirements.[146] Because the vessels are registered as Ghanaian and land at private terminals rather than public ports, every element of PSMA—inspection protocols, documentation requirements, information sharing with flag states and RFMOs—is rendered inapplicable. The treaty covers foreign vessels. These are, legally, domestic vessels. The treaty requires inspection at designated ports. These vessels land at private terminals.

The pattern repeats across every major fishing region. In Morocco, Chinese companies control vessels targeting sardines and octopus through

Moroccan registration. In Senegal, Chinese-owned trawlers operate under Senegalese flags. In Gabon and Côte d'Ivoire, Chinese firms run joint ventures with local partners where Chinese capital, Chinese management, and Chinese crews operate vessels flying African flags. In Fiji and Papua New Guinea, Chinese tuna vessels operate through local registration schemes. In Panama and Ecuador, Chinese squid vessels reflag to access Latin American waters. All of these countries are PSMA parties. All have Chinese-controlled vessels operating under domestic flags exempt from PSMA inspection. The treaty was written to regulate foreign fishing. Beijing eliminated "foreign" as a legal category while maintaining complete operational control.

Bilateral access agreements produce identical results through different legal mechanics. Where Beijing negotiates government-to-government fishing deals—Guinea-Bissau, Mauritania, Papua New Guinea, Seychelles, Kiribati, Micronesia—vessels operate under Chinese flags but land at Chinese-built ports not designated for PSMA inspection. The bilateral agreements provide legal fishing access. The Chinese-controlled infrastructure ensures catch flows from vessel to shore without passing through inspection points PSMA created.

In Mauritania, which became party to the PSMA 2017,[147] a $100 million fisheries complex in Nouadhibou tied to licenses for 169 Chinese vessels has driven the port from fifth to first place globally in foreign catcher traffic between 2017 and 2020—a more than threefold increase in volume.[148] The complex is not designated as a PSMA inspection port. In Papua New Guinea, a PSMA party since 2024,[149] CNFC-built processing plants in Madang and Lae serve as landing points.[150] The plants are not designated ports. In Seychelles, which became a PSMA party in 2013,[151] fifteen Chinese longliners operate under joint monitoring provisions,[152] with the actual landings increasingly occurring at Chinese-controlled facilities not designated for PSMA inspection.

The pattern across both mechanisms—reflagging and bilateral access—is identical: legal structures route operations away from treaty-regulated spaces and into Chinese-controlled infrastructure where inspection never occurs and deals often license more catch than stocks can sustain, resulting in local fishers losing income when landings go unmeasured and unemployment skyrockets as promised jobs never materialize.[153] The treaties assumed that "foreign" and "domestic" are meaningful distinctions, that bilateral agreements between sovereigns would include enforceable inspection provisions, and that catch would flow through ports subject to international oversight. The PRC demonstrated that "foreign" is a legal designation that can be changed with paperwork, that bilateral agreements can route vessels to non-designated ports, and that controlling physical infrastructure determines whether legal obligations have practical effect. The world built treaties to regulate fishing. Beijing built ports where the treaties do not apply.

Case Study: Chile

Chile illustrates how the PRC adapts its distant-water fishing operations in response to enforcement pressure—and why this challenge is no longer confined to distant oceans but directly implicates U.S. interests in the Western Hemisphere. When one coastal state closes a regulatory gap, the fleet does not retreat; it relocates.[154]

Peru first required foreign squid vessels to use its VMS system (SISESAT) in 2020, but weak enforcement allowed many Chinese ships to keep landing under "forced arrival" claims.[155] In September 2024, Peru began enforcing the rule by blocking vessels without active tracking or with IUU ties—effectively ending Chinese squid-fleet port calls by year's end.[156] Weeks later, in November 2024, Xi Jinping made a state visit to Lima, meeting President Dina Boluarte and issuing a joint statement pledging cooperation in trade, infrastructure, and "sustainable fisheries," including commitments under Belt and Road, APEC, and UN frameworks to combat illegal fishing.[157]

With Peru closed, Chile has become the fleet's new hub. According to port arrival records and AIS data between June 1 and September 20, 2025, port calls to Peru fell from over 100 last year to zero this year.[158] Over the same period, more than 80 Chinese distant-water squid vessels arrived at Chilean ports—including Arica, Iquique, Talcahuano, and Valparaíso—up from only nine in 2024.[159] Many had never docked in Chile before; for several, it was their first Latin American port call in five years. C4ADS has identified multiple vessels of interest tied to IUU fishing, forced labor, or other high-risk practices,[160] including nine linked to Pingtan Marine Enterprise—sanctioned by the U.S. Department of Treasury in 2022—and its affiliate Juchangtai.[161] Some ships reportedly received services from Chilean state-owned shipyards,[162] suggesting that while Peru's crackdown closed one corridor, another opened farther south.

Local fishing groups have accused the fleet of depleting Humboldt squid stocks. The arrival of the Chinese fleet intensified pressures on Chile's embattled artisanal sector, already fighting a legislative battle over domestic quota allocations.[163] In March 2025, thousands of fishermen marched on Congress in Valparaíso carrying banners reading "The Sea is Not For Sale," protesting Senate revisions that would preserve industrial dominance over key fisheries.[164] After a committee postponed the vote, protesters clashed with riot police who deployed tear gas and water cannons.[165]

Chilean authorities, meanwhile, have taken a defensive stance regarding the Chinese fleet.[166] On October 9–10, 2025, the Chilean Navy announced that it had inspected foreign vessels and found no incursions within Chile's EEZ.[167] The following day, the PRC's embassy in Santiago issued a formal statement rejecting allegations of illegal fishing, asserting that Chilean naval and fisheries agencies had "found no irregularities," and calling claims of evasion or IUU activity "completely without factual basis." The embassy emphasized that Chinese port

calls "comply with Chilean law," contribute to local economic activity, and reflect Beijing's "zero-tolerance" approach to illegal fishing under the Port State Measures Agreement.[168]

In February 2025, Chile's Under-Secretary of Fisheries Julio Salas Gutiérrez led a delegation to the PRC, meeting Vice Minister Zhang Zhili in Beijing and visiting the Zhoushan National Distant-Water Fishing Base and Shanghai Ocean University.[169] The visit focused on expanding bilateral fisheries cooperation across the full value chain—from distant-water operations and aquaculture to science, technology, and enforcement. Both sides discussed creating a formal cooperation mechanism, signing a new memorandum of understanding, and deepening coordination on "sustainable and high-value fisheries development."[170]

Official China-Chile Fisheries Engagements

Chilean Under-Secretary of Fisheries and Aquaculture Julio Salas Gutiérrez met in Beijing with Chinese Vice Minister of Agriculture and Rural Affairs Zhang Zhili to discuss strengthening China–Chile fisheries cooperation, February 2025.[171]

Finding: Overcapacity and Mandatory Landing Rules Force Global Seafood Through Chinese Processing Hubs

Beijing cannot decide where fish swim, but it has learned to control where they land, where they are processed, and how much they are worth. Fish are highly perishable, and spoilage begins as soon as it dies. Typically, fish is brought on board the vessel and held until sorted. Once sorted or graded, the fish is gutted, bled and washed. Freezing is the oldest and most common method of preservation as it is both safe and keeps fish moist. Fish is normally frozen in 20-22 kg cartons and stored and unloaded or reloaded and transported. Larger fishing vessels often have processing and freezing capacity on board whereas reefer vessels will support smaller fishing vessels. These reefer vessels can prepare and freeze the fish while transported to port.[172]

Many fishing operators have prior arrangements with buyers to purchase the fish caught. Ownership will often transfer in the moment the fish leaves the rail and is transshipped to the reefer vessel. The fish is then traded whilst it is transported to port. If an agreement has not been made with a buyer

before the fish reaches port, then it may be kept on board a vessel until a buyer is located. Partly processed fish is transported (often in several consecutive legs) to a fish processing plant. At the fish processing plant the fish is moderately thawed and filleted and frozen.[173] Fish processing may also take place on board vessels to increase the fishing operator's profit. Fish processing vessels – factory ships – are often large industrialized vessels that can contain on-board fish processing factories.[174]

The real money in seafood is made not at sea but onshore—when whole fish become fillets, surimi, or canned products that multiply their value severalfold. A pollock that sells for $350 a ton at the dock is worth up to $3,000 once processed and packaged. Control of processing means control of value, market access, and, ultimately, global price.

The PRC's rise as the center of global seafood processing began not from strategy but from crisis. When Beijing dismantled its state-run fisheries in 1985, shrimp farming exploded overnight, expanding two hundredfold by 1990. The boom ended as fast as it began: disease wiped out 70 percent of production by 1994. At the same time, newly privatized fleets overfished the PRC's coastal waters, forcing nationwide fishing bans and fleet cuts by the mid-1990s. Processing plants stood empty, their workers and equipment waiting for fish that no longer came.

The collapse of the Soviet Union changed that. Russia's Far East fisheries, stripped of state funding, abandoned their domestic plants and began transshipping raw catch through South Korea to northern provinces of the PRC. Shandong and Liaoning—two provinces with idle plants and cheap labor—became the natural landing points. Beijing formalized this trade through bonded zones that waived tariffs on fish imported for re-export, locking in the PRC's role as the processor of choice for Russian and foreign fleets alike. By 2006, the PRC's seafood exports had grown tenfold, from 300 thousand tons in 1989 to nearly three million tons today. Its processors supplied 38 percent of Europe's frozen whitefish, 46 percent of plaice, and 22 percent of salmon. As of 2025, the PRC processes roughly 35–40 percent of the world's seafood—about 30 million metric tons a year—and remains 20–25 percent cheaper than U.S. processors even after new tariffs.

Today, Beijing directs its DWF fleet to land catch at government-approved Chinese ports, reinforced by the 14th Five-Year Plan's cap of approximately 2.3 million metric tons in distant-water output and fleet limits below 3,000 vessels.[175] The government designates "national distant-water fishery bases" that receive fuel subsidies, vessel construction subsidies, port subsidies, and tax exemptions on "self-caught" seafood returned to the PRC. These subsidies make Chinese ports more profitable than foreign alternatives, ensuring raw catch flows into the PRC's domestic processing system.

Onshore

Once landed, catch enters an oversized processing sector with 9,433 facilities[176] and 30.2 million metric tons of annual capacity—far exceeding domestic needs. Approximately 75 percent of seafood imports are processed and re-exported rather than consumed in the PRC, making the country a global processing hub rather than an end market.[177] Heavy state subsidization allows Chinese processors to operate at artificially low price points that unsubsidized competitors cannot match. State subsidies eliminate normal profit constraints, so Chinese processing capacity never contracts even when vastly exceeding demand. This creates permanent price suppression that forces foreign plant closures and channels increasing global seafood volumes through Chinese facilities.

Geographic concentration intensifies Beijing's control: just two provinces—Shandong and Liaoning—receive 98 percent of imported salmon and 92 percent of imported whitefish for processing. Beijing deliberately concentrated processing in these designated "national distant-water fishery bases" where provincial authorities enforce regulatory standards. Dalian in Liaoning specializes in cod and pollock for U.S. markets, while Qingdao in Shandong handles salmon and whitefish for European buyers. This specialization allows Beijing to control global supply through provincial decisions, as demonstrated when authorities shut down Dalian's entire processing sector for weeks in 2007 and 2008, cutting off substantial global cod and pollock supply.

Offshore

When direct repatriation proves impractical, Beijing extends control through newer overseas infrastructure. Chinese entities have built or acquired processing facilities, cold storage, and port terminals in more than 90 foreign locations. These overseas facilities—typically smaller joint ventures dispersed from West Africa to Latin America to Southeast Asia—allow Chinese entities to control processing access, throughput, and market entry even when fish never reaches the mainland. In Guinea-Bissau, for example, the China National Fisheries Corporation operates fifteen trawlers[178] while managing the Banting Highlands Fishing Port[179] and an $8 million processing plant handling 30,000 tons annually.[180]

The result is a PRC-centered supply chain where global seafood flows through Chinese-controlled chokepoints, foreign processors face displacement by subsidized competition, and Beijing holds structural leverage over global seafood trade.

Finding: China Engineered a Permanent, State-Supported Cost Advantage Across All Major Production Inputs

The PRC's seafood processing dominance rests not on efficiency or innovation but on systematic cost suppression across every major input—labor, raw materials, energy, logistics, and compliance. Through forced labor, tariff manipulation, subsidized utilities, state-controlled transport, and opaque corporate structures, Beijing built a processing system that makes compliance with labor, trade, and transparency standards a competitive liability rather than a legal baseline.

Estimated Annual "Standard Plant" Expenses for Labor, Fish Purchase, Electricity, and Product Shipping (cost per metric ton of plant fillet output)

Region	Fish Purchase *	Hourly Wages **	Product Transportation ***	Electricity Costs	All Main Cost Categories
Bristol Bay	$4,525	$1,250	$775	$200	$6,750
Southeast Alaska	$4,525	$1,250	$225	$75	$6,050
Southwest Alaska	$4,525	$1,250	$500	$200	$6,450
Washington	$5,725	$1,275	**	$50	$7,025
Mainland China	$4,725	$325	$100	$50	$5,200

Source: McKinley Research Group estimates. See sections below for detailed sourcing information.[181]
* Cost to purchase fish at point of production. Washington and the PRC values include shipping costs to bring fish to the plant.
** Hourly wages for select job titles only; excludes housing, benefits, or other labor costs.
*** Cost to ship processed products to a U.S. West Coast port of entry. No value for Washington included because processors in this region are already in the U.S. West Coast market.

Labor

To keep seafood processing costs the lowest in the world, Beijing eliminated the biggest expense in the value chain: labor. Since 2018, the Chinese government has forced Uyghur and other Muslim minorities into "labor transfer" programs—state-run initiatives that claim to fight poverty but in reality compel workers into assigned factory jobs[182]—while North Korean overseas workers have also faced forced labor in the seafood processing industry.[183]

In Shandong—the PRC's main seafood hub—*The Outlaw Ocean Project* found that ten major processors received over a thousand Uyghur and other minority workers through government transfer programs.[184] The estimate includes transfers to eight major seafood groups—Yantai Sanko,[185] Shandong Meijia,[186] the Chishan Group,[187] Qingdao Tianyuan,[188] Weihai Xinghe Food,[189] Rongsense,[190] Yantai Longwin,[191] and Qingdao Lian Yang.[192] Those plants exported 47,000 tons of seafood to U.S. buyers, with three factories alone producing 17 percent of all Chinese squid shipped to the U.S. over the last five years. These plants exported 47,000 tons of seafood to U.S. buyers,[193] and three of them accounted for 17 percent of all Chinese squid shipped to the U.S. over the past five years.[194]

Forced Labor in Chinese Seafood Processing Facilities

Uyghurs boarding private charter flight CZ681R from Hotan, Xinjiang, for work at a Shandong seafood factory, in March 2020 (top); labor transfers overseen by Xinjiang Zhongtai Group, the company sending Uyghurs to at least one Shandong seafood factory. Sources: China Civil Aviation Network, Yarn Network, Weixin / The Outlaw Ocean Project

Selfie uploaded by a Uyghur Douyin user during transfer to a Meijia Group plant in 2021 (left), and a still from a video uploaded to a Chinese government account in 2023 depicting a "farewell ceremony" organized by the Kashgar authorities. Sources: Douyin / The Outlaw Ocean Project

Chishan Group

Stills from 2022 videos uploaded by two Uyghur Douyin users (bottom left, upper right) are compared with a still from another video (bottom right) and an image from Rongcheng Haibo promotional materials (upper left). Sources: Douyin; Rongcheng Haibo; The Outlaw Ocean Project

Shandong Meijia Group

Stills from Douyin videos uploaded by Uyghur users working at Rizhao Meijia Keyuan Foods Co. Ltd. are shown alongside promotional material from Meijia Group, with the top left image depicting workers in No. 4 workshop. Distinctive headbands and colored face mask securers were key markers for identifying Meijia Group facility interiors on Douyin. Credit: Douyin; Meijia Group; The Outlaw Ocean Project

Inside these factories, transferred and local workers stand on the same lines and appear on the same payrolls, but their conditions diverge sharply. Regular employees earn $4.17 and $4.43 an hour for basic work and $8–$10 for skilled jobs,[195] while transferred Uyghurs are paid token wages often withheld by the state.[196] This design makes forced labor appear legal and obscures any distinction between coercion and consent, creating a national labor framework that replaces market wages with state-controlled labor.

Even companies with certifications designating them as sustainable are implicated. Ten Chinese seafood processing plants tied to Uyghur forced labor are Marine Stewardship Council (MSC) certified while four are Aquaculture Stewardship Council (ASC) certified.[197] MSC claimed a recent update to their certification would "provide seafood buyers and consumers with greater assurances" that certified companies did not use forced or child labor, but certificates were issued after all ten processing plants had accepted Uyghurs through government transfers.[198] [199] [200] Furthermore, five of the sites were certified by leading social audit firms, including global giants SGS SA and Intertek Group PLC.[201]

The cost gap is stark: in Alaska, seafood processors earn $16–$18 an hour, rising to $20–$23 with overtime, and employers cover airfare, housing, and meals—$734–$1,500 per worker—while Washington State plants pay $16–$19 an hour, reaching $19.30 in the Seattle–Tacoma area.[202] In CCP forced-labor facilities, transferred Uyghurs' wages effectively vanish into state coffers. Labor becomes a state subsidy—one no lawful competitor can match without violating international law.

Raw Materials

The PRC's seafood processing sector achieves its lowest input costs through three mechanisms: state-enabled access to subsidized Russian seafood, tariff exemptions on imports designated for re-export, and systematic evasion of Beijing's own 26 percent import duties. These mechanisms eliminate normal market constraints and create a structural raw material advantage that no market-based competitor can replicate.

An Alaska processor pays $350 per metric ton for pollock at the dock, a Washington processor pays $750 per ton after shipping, yet a Chinese processor pays $337 per ton even though the fish originate thousands of miles farther from Chinese plants. Chinese processors achieve this because they source primarily from Russia, not from open-market fisheries.

Trade data confirm that 94 percent of the pollock and 58 percent of the pink salmon processed in the PRC come from Russia, where the government subsidizes its fleet, permits gear banned in Alaska, pays lower wages, and benefits from depressed prices caused by international sanctions after the invasion of Ukraine. Moscow's subsidy regime and Beijing's sanction defiance

combine to produce a politically discounted raw material supply, not a competitive one.

Chinese Imports of Select Fish Species, 2022–2023 Annual Average

Species	Total Annual Imports (mt)	% from U.S.	Avg U.S. Product Price ($/mt)	% from Russia	Avg Russian Product Price ($/mt)
Pink Salmon *	140,368	38%	3,205	58%	2,477
Sockeye Salmon	4,433	81%	7,220	13%	6,868
Pollock	589,358	4%	1,645	94%	1,261

Source: Trade Data Monitor
Note: Pollock imports = HS 03.036700; Sockeye = HS 03.031100; Pink Salmon (HS 03.031200) includes all non-sockeye Pacific salmons but is mostly pink salmon. Percentages do not sum to 100 due to other origins.

When Chinese processors import U.S. seafood, they receive an additional cost advantage through Beijing's tariff exemption for re-exported materials, administered through the Trade Processing Manual (TPM) system that is supposed to track how much seafood each plant imports and exports. In practice, the TPM system does not prevent evasion—Chinese processors underreport yields to reduce their declared export volumes.

Reported salmon yields average 26 to 36 percent, far below the 51 to 81 percent yields achieved in competitive markets such as Alaska and the 50 percent-plus yields that traders in the PRC privately acknowledge. The discrepancy equals 13,000 to 44,000 metric tons of salmon each year missing from official export records, product that enters the PRC's domestic market without paying duties, moves into unrecorded export channels, or is held in state reserves.

Chinese Customs acknowledged the abuse in 2008 and attempted to limit manipulation by capping individual TPMs at $500,000 or 100,000 tons, but the measure failed because processors created multiple shell companies to split shipments across different entities. A Qingdao importer stated, "Everybody has their ways to avoid paying the full tariffs. It's a game all of us are very good at playing."

The Chinese government allows this practice because systematic tariff evasion functions as a flexible state subsidy that maintains the formal appearance of compliance while removing the financial effect of the 26 percent tariff. When export margins narrow, processors lower their costs by diverting duty-free imports into the domestic market.

Together, sanctioned Russian supply, tariff exemptions, and tolerated evasion suppress the true cost of fish in the PRC's processing sector below market value. Alaska processors pay market prices without tariff relief, while Chinese processors importing the same fish pay no duties, use forced labor, and re-export finished products to U.S. buyers—a cost difference that results not from efficiency or scale but from deliberate state strategy.

Electricity

Beijing subsidizes electricity for industrial users to keep export manufacturing costs artificially low, with Chinese processing plants paying $0.09 to $0.12 per kilowatt hour—$450,000 to $600,000 annually for a standard plant—because state-owned utilities absorb losses to maintain rates below market levels regardless of actual generation costs.

Industrial Electricity Costs per Kilowatt Hour (kWh), by Select Provinces, 2023

Shandong	1–10 kV	$0.14
	35 kV	$0.14
	110 kV	$0.14
	≥ 220 kV	$0.14
Liaoning	1–10 kV	$0.10
	35 kV	$0.10
	110 kV	$0.09
	≥ 220 kV	$0.09

A Bristol Bay plant, by contrast, pays $0.36 to $0.45 per kilowatt hour because it runs on diesel generators in one of the world's most remote fishing regions—$1.8 million to $2.25 million annually for the same facility. Southwest Alaska plants pay $0.15 to $0.65 per kilowatt hour depending on isolation and fuel transport costs, while even Washington plants with hydroelectric access pay $0.05 to $0.12 per kilowatt hour, or $250,000 to $600,000 per year—still market rates without state subsidy.

Estimated Electricity Costs per Kilowatt Hour and Total Annual Electric Costs for "Standard" Seafood Processing Plant by Region, 2025

Region	$/kWh Rate	Estimated Annual Electric Service Cost	Main Types of Power Generation
Bristol Bay	$0.36–$0.45	$1,800,000–$2,250,000	Diesel
Southeast Alaska	$0.06–$0.27	$300,000–$1,350,000	Hydro, Diesel
Southwest Alaska	$0.15–$0.65	$750,000–$3,250,000	Diesel
Washington	$0.05–$0.12	$250,000–$600,000	Hydro, Natural Gas, Wind
Mainland China	$0.09–$0.12	$450,000–$600,000	Coal, Nuclear, Solar, Hydro, Wind

Source: Electric utility rate sheets, interviews, and Dezan Shira & Associates (China rates).

Logistics

The PRC has engineered a shipping system where the government absorbs transportation costs to give its processors a structural advantage over global competitors.

Chinese seafood processors do not pay market rates for transportation because the government controls nearly every part of the logistics chain—from state-owned carriers like COSCO to the ports of Qingdao and Dalian where export cargo receives priority berthing, discounted handling, and expedited

customs clearance. These facilities are structured to move exports quickly and cheaply, not to recover operating costs, creating a state-subsidized logistics network that keeps shipping prices artificially low.

That advantage becomes clear when comparing the full cost of processing routes. The direct Alaska-to-Seattle shipping rate of $400–$500 per metric ton applies only to finished fillets—but U.S. processors must also pay all domestic labor, energy, and compliance costs to produce those fillets before shipping. Shipping raw pollock to the PRC for processing and then back to the U.S. costs $575–$700 per metric ton in freight alone, but Chinese processors offset this through forced labor, subsidized electricity, and tariff evasion that U.S. plants cannot match. The return leg from the PRC to the U.S. costs only $75–$100 per metric ton because state-owned shipping companies move export cargo below cost. When the entire processing cost structure is considered—not just freight—the PRC route delivers finished product to U.S. markets at lower total cost despite the 10,000-mile journey.

Total Estimated Shipping Cost ($/MT) of Shipping Frozen Alaska Pollock Fillet from Unalaska to the U.S. West Coast, 2025 Spot Prices

Market Segment	Alaska to China	China to U.S. West Coast	Direct Alaska to West Coast	Total Shipping Cost to U.S. Market
Alaska to U.S. market direct	N/A	N/A	$400–$500	$400–$500
Alaska to U.S. market via China	$500–$600*	$75–$100	N/A	$575–$700

Source: McKinley Research Group estimates based on domestic shipping tariff books and industry interviews
Note: analysis excludes cold storage and other logistics
*Price adjusted upward using seafood yield data to account for cost of transporting material trimmed away to produce fillet.

By contrast, U.S. seafood processors must pay the full cost of domestic transportation under the Jones Act, which requires that any cargo moved between U.S. ports travel on U.S.-built, U.S.-flagged, and U.S.-crewed vessels. The law protects U.S. shipbuilding and maritime jobs but also drives up costs because U.S.-built ships and American crews are more expensive to operate than foreign alternatives. A processor in Alaska shipping pollock fillets to Seattle—roughly 2,000 miles—pays $400–$500 per metric ton, but only after absorbing the full, unsubsidized costs of processing in the U.S. Bristol Bay plants in more remote locations pay as much as $775 per metric ton due to isolation, limited vessel access, and reliance on diesel-powered infrastructure. These costs vary sharply across Alaska depending on geography and available infrastructure.

Frozen Seafood Domestic Spot Shipping Prices from Alaska Study Regions to Washington ($/MT), 2025

Origin	Spot Shipping Price Range ($/MT)
Bristol Bay	$625–$775
Southeast Alaska	$175–$325
Southwest Alaska	$400–$500

Source: Domestic shipping tariff books

The result is a fundamental market distortion: when combined with subsidized processing inputs detailed elsewhere in this report, the PRC's government-managed transport system makes the 10,000-mile route cheaper than domestic processing and shipping, with every leg of the overseas journey operating below cost and sustained by state subsidy.

Insurance

Insurance represents a relatively minor cost driver for seafood processors in both the U.S. and the PRC, but the difference lies in compliance: in the U.S., insurance is a market product purchased to manage risk; in China, it functions largely as a formality under state-managed regulation.

U.S. processors in Alaska and Washington purchase multiple forms of commercial insurance—property, liability, spoilage, marine cargo, and workers' compensation—required to obtain financing, protect assets, and meet legal obligations. Workers' compensation premiums are benchmarked to payroll and industry risk, with the median rate across the U.S. in 2022 at $1.27 per $100 in wages and Alaska and Washington near that average.[203] Marine cargo insurance, by contrast, has become a rising cost with premiums increasing 20 to 40 percent between 2018 and 2024 due to global reinsurance pressures.[204]

In the PRC, the formal insurance framework exists but serves a different purpose: companies must show compliance with an extensive system of national laws and licenses, but enforcement is weak, especially in sectors using transferred or coerced labor. Workers' compensation coverage is legally required but rarely enforced, while property, liability, and marine insurance are heavily underwritten by state-affiliated insurers whose pricing and claims practices are shaped by political rather than actuarial factors.

For Chinese seafood processors, the practical cost of insurance is minimal because risk is absorbed by the state, allowing them to forgo genuine risk mitigation—another hidden subsidy where U.S. processors must internalize the true cost of risk through commercial insurance markets while Chinese plants externalize those same risks through state protection and regulatory leniency.

Corporate Structure: Engineered Obscurity

Chinese seafood processors deliberately fragment their operations to sever the documented chain of custody for seafood exports through networks of nominally independent import-export companies that change names, registrations, and reporting obligations to obscure ownership and traceability. Between 2006 and 2007, 472 entities imported salmon and whitefish into the PRC, but only a small fraction conducted actual processing—the ten largest importers handled roughly one-third of total volume, with several acting as trading fronts for unlisted plants.

Large processors such as Yilufa channel shipments through Shandong Machinery Import and Export Group, while Shandong Jinyi Textile Company—a textile firm on paper—handles seafood alongside industrial goods, allowing plants to re-route exports through another front company when U.S. authorities trace a shipment to a specific facility. Processors engage in "swapping," the off-the-books exchange of fish among firms to balance species mix and output—transactions that bypass customs documentation and destroy the continuous chain of custody between importer, processor, and exporter.

This structure prevents regulators from verifying product origin or labor conditions, conceals the role of forced labor in the supply chain, and makes the PRC's seafood processing network a system of deliberate opacity that prioritizes concealment over compliance.

Finding: China Converted Seafood Processing Dominance into Global Seafood Pricing Power

Beijing turned processing dominance into pricing power by controlling both the ownership of fish during processing and the price signals that govern transactions. Instead of allowing market competition to set prices, the PRC uses legal ownership, administrative benchmarks, and coordinated pricing behavior to shape what vessels receive and what buyers pay, giving Beijing influence over global price formation across high-volume species.

Strategic Ownership Models

Beijing uses two principal processing-trade models under customs regulation: "processing with imported materials" (进料加工), in which title to inputs transfers to a Chinese firm at import, and "processing with supplied materials" (来料加工), where foreign firms retain ownership and Chinese plants provide processing services.

For salmon and whitefish, the "processing with imported materials" model dominates: Chinese firms take title upon import, giving Beijing leverage over pricing and distribution while shielding operations from foreign audits or contract enforcement under Chinese law. Once title transfers, processors operate within Beijing's coordinated pricing system where state guidance—not competitive bidding—determines input costs and output prices. A 2024 academic study found that the PRC's exports of cod and haddock exceed imports by 35 percent, demonstrating systematic species substitution where processors import cheaper whitefish like blue whiting and re-export under premium classifications to manipulate margins independent of actual input costs. This processing model, "based on low cost and scale" and "reinforced by fishery management systems in place in many parts of the world," enables cost advantages that "threaten the sustainability of the seafood industry elsewhere."

For tuna, Beijing's control rests on direct state ownership of the DWF fleet combined with infrastructure dominance over processing and export channels. According to a July 2024 Planet Tracker report, state-owned enterprises control at least half of the PRC's tuna production, with the top four tuna-producing companies all state-owned or state-affiliated. Shanghai Kaichuang Marine International, a state-owned firm, operates the largest tuna purse-seine and trawler fleets in the PRC, while Chinese state-owned conglomerates have explicitly declared plans to become price-setters in global seafood markets. Beijing tolerates limited foreign participation in processing to access specialized capital and expertise but maintains absolute control over landing locations, processing facilities, and export channels. The PRC became the third-largest global tuna exporter in 2024 with estimated catch of 395,000 tons in 2023, flooding the European Union (EU) with an average of 35,000 metric tons annually from 2020 to 2023 under tariff-free quotas—volume that prompted formal complaints from EU producers about "cheap tuna produced with lower standards than European regulations require, especially regarding labor conditions."

Across species, the pattern is clear: ownership rules are selected not for efficiency but to maximize Chinese control of pricing leverage while limiting foreign visibility into operations. Beijing's strategic deployment of ownership models demonstrates deliberate positioning to extract maximum control over global supply chains and price formation while maintaining the appearance of normal commercial relationships.

State-Controlled Price Benchmarks

After designating aquatic products as "important commodity resources" within the "national food security system,"[205] Beijing built a state-managed pricing regime to standardize reference prices, steer transactions, and coordinate industry behavior.

Squid became the proof of concept. Controlling more than 60 percent of global high-seas squid catch, the PRC had the volume needed to anchor a benchmark. In 2019, the Ministry of Agriculture and Rural Affairs and provincial partners launched the *China Distant-Water Squid Index* to "enhance China's discourse power and pricing power"[206] in global squid markets.[207] Marketed as the industry's "price barometer and weathervane,"[208] the index enabled authorities to monitor markets, guide pricing decisions, and coordinate industry behavior.[209] Beijing then codified its use: the 2020 directive on *Strengthening the Conservation of High Seas Squid Resources* ordered industry to use the index to "guide squid product market pricing,"[210] and the 2022 *Opinions on Promoting High-Quality Distant-Water Fisheries* expanded the model to the full value chain—while instructing authorities to replicate the system for other species, including a forthcoming national *Tuna Index* now under development.[211]

By publishing a "reference price," Beijing coordinates the expectations of thousands of independent buyers and sellers, reducing price competition among

Chinese processors and enabling tacit collusion without explicit communication. In competitive markets, processors bid against each other for catch and undercut each other for buyers. Beijing's index eliminates both: it tells vessels what to expect at port and tells buyers what to expect from processors, collapsing the range of negotiated prices around a state-defined anchor. The result is price stability that benefits Chinese processors at the expense of fishermen and foreign buyers, who face a coordinated bloc rather than a fragmented market.

With this system, Beijing extends control from where seafood lands to what buyers pay—turning volume dominance into pricing power and moving step-by-step toward price-setting authority across multiple high-value species.

Finding: China Manipulates Global Seafood Markets to Eliminate U.S. Processing Capacity and Entrench American Dependence

Foreign investment and competition in U.S. seafood are not new.[212] What is new—and uniquely dangerous about the PRC—is a state-directed system that can manufacture overcapacity, suppress costs through coercive labor and subsidies, and then use coordinated pricing and processing chokepoints to make lawful U.S. production structurally uncompetitive. This is not normal globalization; it is strategic market manipulation designed to eliminate alternative processing capacity, force raw product into PRC-controlled channels, and leave U.S. fishermen and consumers dependent on an adversary-controlled supply chain. The result is a hollowed-out domestic base where even when American firms try to reinvest, they cannot clear the price environment long enough to build—new U.S. production sites cannot even "log on" before state-subsidized dumping resets the market.

Through state-directed overcapacity, forced-labor cost advantages, and centralized price suppression, Beijing engineered conditions in which American processors could not survive or reinvest. In May 2022, the American seafood company announced a $300 million Alaska pollock processing facility—the largest American seafood investment in decades—calculating that stable dockside fish prices and superior U.S. technology could compete against foreign processors.[213] The economics looked viable: the prices fishermen got paid at the dock—called exvessel prices—held steady at $0.15 to $0.19 per pound,[214] American fillet production still exceeded Russia's,[215] and U.S. facilities operated under the world's highest labor and environmental standards. Within eighteen months, it abandoned the project, destroyed by predatory pricing no lawful competitor could survive.

The kill was deliberate and coordinated. In February 2023, Russia's fisheries chief Ilya Shestakov publicly admitted their fish pricing was not market-driven, stating that "fishermen's costs are not directly reflected in the retail price of fish" because "they only form the cost basis, then market regulation takes over," with the government deliberately calculating subsidy rates "so these taxes

would not noticeably affect prices."[216] Then, in March 2023, just as the company was moving forward, Russia and the PRC held their first post-COVID fisheries meeting, with the PRC making Russia its first foreign delegation and calling the relationship "a priority."[217] Russia unveiled an electronic system to speed seafood flows to the PRC and announced it was shifting from selling raw fish to sending it to Chinese processing facilities that would turn it into finished fillets, surimi, and canned goods—products that Beijing could then export to global markets at prices no American processor following normal labor and environmental rules could match.[218]

The numbers reveal the predation: Russia increased its 2024 pollock quota to 2.285 million tons—the highest catch in 25 years—knowing it would collapse prices, with Russian pollock exports to China surging to 880,000 metric tons in 2023 (up 13 percent year-over-year), representing 95 percent of the PRC's frozen pollock imports and over 40 percent of all Chinese frozen fish imports.[219] Yet despite this massive 36 percent volume surge, the value rose barely 4.88 percent.[220] Russian pollock processed using forced Uyghur and North Korean labor in Chinese facilities was dumped into global markets at prices $1,000 per ton below Alaska producers—not because of efficiency but because slave labor and state subsidies eliminated normal costs. By mid-2024, the price collapse was catastrophic: European pollock fillet prices down 45 percent, Chinese market prices down 25 percent, Russian domestic prices crashed 21.5 percent in six months.[221]

On August 15, 2023, the company halted any further investment in the facility, with its CEO describing market conditions he had "never seen" where foreign processors were "selling at or below cost just to generate cash"—the signature of state-subsidized dumping that eliminates the normal market correction where money-losing producers exit.[222] The company stated bluntly that "foreign supply chains with low regulatory standards and no meaningful oversight" made continued investment impossible.[223] Three months later, Russia doubled its export subsidies from 25 to 50 percent of logistics costs while simultaneously cutting domestic distribution subsidies, forcing Russian consumers to absorb 15 percent price increases as the state bankrolled below-cost exports abroad.[224]

Russian pollock exports to the PRC then accelerated another 33 percent through the first quarter of 2024,[225] and in May 2024—as U.S. sanctions took effect—Russia's Pollock Catchers Association formalized partnerships with Chinese processors to exploit "full industry chain complementary advantages" to expand pollock product development and market sales, while Chinese import facilities handling Russian frozen fish surged 66 percent year-over-year with imports from Russia up 70 percent.[226] Russian officials celebrated 1.3 million tons of exports to the PRC despite U.S. sanctions,[227] and Moscow publicly dismissed American concerns as attempts to "restore their monopoly" on markets that "currently prefer quality Russian fish."[228] U.S. sanctions proved worthless—

Russian product simply flowed through Chinese processing facilities and re-entered global markets, making it impossible to break Beijing's chokehold on global seafood supply chains.

Finding: China Launders, Falsifies, and Contaminates Global Seafood through State-directed Processing and Re-export Networks

The U.S. imports more than 80 percent of its seafood, creating a major strategic vulnerability tied to its dependence on the PRC—the world's largest producer and a top seafood exporter valued at $18.5 billion annually.[229] This reliance exposes U.S. markets to China's widespread seafood fraud, which takes several forms: (1) species substitution, (2) adulteration, (3) short weighting, and (4) origin mislabeling.[230]

Species Substitution

Species substitution, or "fish swapping," occurs when cheaper fish are passed off as premium species to skirt restrictions and boost profits. The practice thrives in the PRC's coastal processing hubs like Qingdao and Dalian, where thousands of bonded plants and free-trade zones—customs-controlled areas that allow duty-free import, processing, and re-export—handle seafood from Russia, the U.S., Chile, Japan, and Korea. Inside these zones, frozen fish from multiple countries are stored side by side in vast warehouses with limited inspection, then thawed, hand-filleted, and repackaged—often with cheaper species relabeled as premium ones and documentation rewritten to match, a practice traders openly call "swapping."[231] Some of this seafood is blended into composite products like fish sticks containing multiple species, including fish caught by fleets linked to illegal fishing or forced labor.

Furthermore, up to 90 percent of the processed seafood is re-exported under bonded status, often without formally entering the PRC's domestic market, moving through layers of intermediaries, paperwork, and exemptions before reaching foreign retailers—its true species, origin, and labor conditions effectively erased.[232] And, as this infrastructure merges with e-commerce, substitution now spreads across the chain: processors source cheap mislabeled fish online for reprocessing and resale, while consumers encounter the same fraud in digital marketplaces that obscure species identity and origin.[233]

Fish swapping is pervasive in the PRC's domestic seafood market: DNA audits across major retail and e-commerce channels have found substitution rates between 37 and 87.5 percent, with dried and grilled products most frequently mislabeled as higher-value species.[234] The same practices have directly affected U.S. imports: in 2007, pufferfish from the PRC were falsely labeled as monkfish;[235] in 2009, DNA testing showed that Chinese "catfish" exports were actually cheaper species such as Basa and Swai;[236] and throughout the 2010s, U.S. processors increasingly sent wild Alaskan salmon and pollock to the PRC for low-cost filleting and packaging for re-export—only to receive substituted or

lower-grade fish in return, revealing how the PRC's processing and re-export system has embedded seafood fraud deep within American supply chains.[237]

Beijing's new food-labeling rules—the *General Standard for the Labeling of Prepackaged Foods* and *Food Labeling Supervision and Administration Measures*—take effect in March 2027.[238] However, they apply broadly across food sectors, leaving seafood's distinct risks—complex supply chains, rapid spoilage, vast species diversity, and frequent repackaging—largely unaddressed, with no species-level traceability or catch documentation to bring transparency to the PRC's opaque seafood trade.

Origin Mislabeling

Origin mislabeling uses false documentation, at-sea transfers, and transshipment to obscure the true source of the catch, allowing exporters to evade tariffs and conceal illegal fishing. The same bonded processing infrastructure that enables species substitution also facilitates origin fraud: as seafood from multiple countries moves through coastal hubs for repackaging, documentation can be rewritten to obscure where fish were caught.

Additionally, at-sea transfers between fishing vessels and cargo ships allow catches to be commingled before reaching port. A 2024 U.S.–Norwegian study found China's seafood exports of cod and haddock exceeded its imports by roughly 35 percent, confirming systematic origin falsification.[239] Beyond these documented cases, a 2018 study found 59 percent of fresh and frozen catfish products in U.S. grocery stores violated Country of Origin Labeling regulations, revealing how widespread noncompliance with origin rules extends across seafood categories and retail channels.

Adulteration

Adulteration involves the use of banned chemicals or unsafe additives in aquaculture products to accelerate growth and preserve appearance. The practice is endemic to the PRC's intensive aquaculture system, where fish crammed into ponds with poor water quality are kept alive through routine antibiotics, antifungals, and disinfectants—often applied without veterinary oversight. Banned substances like malachite green, nitrofuran, and fluoroquinolones are openly sold by lightly regulated suppliers, while fragmented oversight and local officials prioritizing production over safety leave enforcement weak and inconsistent. Chemical use is not a rogue operator problem—it's how the system works. This problem is exacerbated by the fact that despite these conditions, China has controlled over half of global aquaculture output.[240]

FDA testing between 2006 and 2007 found banned chemicals in 25 percent of Chinese aquaculture samples—substances like malachite green and nitrofurans prohibited for causing cancer and antibiotic resistance.[241] Between

2010 and 2015, the PRC accounted for 37 percent of all seafood shipments FDA refused for drug violations.[242] In 2022, FDA detected PFOA, a toxic forever chemical linked to cancer, in Chinese canned clams, leading to eight Chinese processors being added to Import Alert 99-48's "Red List" in February 2025[243]—the first time processors were flagged specifically for chemical contamination.[244] That same month, FDA expanded Import Alert 16-131 to cover all aquaculture shrimp, dace, and eel from China and Hong Kong—including products merely processed there—requiring even seafood sourced outside China but processed there to prove full supply-chain traceability.[245] Nine Chinese and three Hong Kong firms remain on Import Alert 16-02 for insect or animal filth contamination.[246]

Short Weighting

Short weighting occurs when excess ice or additives are used to inflate product weight and increase apparent value. The practice is straightforward: frozen seafood blocks are over-glazed with water or injected with phosphates and other water-retaining chemicals that add weight without adding fish, allowing processors to charge for water as if it were premium product.

FDA has warned since 1991 that including glaze weight in net weight violates federal law and constitutes fraud "committed with the intent to defraud or mislead," yet the practice persists.[247] In 2017, the Better Seafood Board documented exporters openly offering U.S. buyers seafood at "90% net weight" or "80% net weight"—pricing products with glaze included as part of the listed weight.[248] A Chinese processor offered tilapia at $1.45 per lb. at 90 percent net weight versus $1.34 per lb. at 80 percent net weight. A Chilean intermediary selling Chinese tilapia quoted three different net-weight percentages at three different prices—effectively selling water as fish.[249] Between 2022 and 2024, FDA found 36 percent of imported frozen seafood was short weighted, including Chinese shipments inflated with excess ice glaze, leading to refused entry and five firms placed on Import Alert 99-47.[250]

Chinese seafood fraud systematically evades U.S. enforcement and threatens American economic security, public health, and fair competition. Despite FDA inspection refusals for Chinese seafood exceeding those for any other country, U.S. agencies inspect only 1–2.4 percent of imports, allowing mislabeled and contaminated products to routinely enter commerce.[251] GAO reviews in 2017[252] and 2019[253] found FDA and Customs lacked coordinated systems to track how importers evade import alerts, leaving enforcement reactive rather than preventive. The consequences are substantial: fraudulent Chinese imports undercut legitimate producers and threaten 1.6 million American seafood industry jobs[254] and contribute to a $24.2 billion seafood trade deficit.[255] These fraudulent imports also endanger consumers through deadly substitutions—toxic pufferfish sold as monkfish,[256] mercury-laden fish marketed as safe,[257] and imports laced with illegal antibiotics that fuel drug resistance.[258]

Existing legal frameworks—including Section 403(b) of the Federal Food, Drug, and Cosmetic Act[259] and the Lacey Act[260]—remain inadequate without mandatory traceability: FDA's overly broad labeling standards facilitate substitution, NOAA's voluntary inspection covers only one-fifth of U.S. seafood despite finding fraud in 40 percent of samples, and without end-to-end supply chain verification, the PRC's state-directed processing networks will continue laundering illegal and contaminated seafood into American markets.[261]

PART IV: POLICY RECOMMENDATIONS

Recommendation 1: Enable allied and partner nations to detect, disrupt, and eliminate IUU fishing in their waters.
Specifically, Congress should:

- Authorize and fund the USCG through the Maritime SAFE Working Group to expand training operations, targeted patrols, and international engagements beyond the five priority flag states (Ecuador, Panama, Senegal, Taiwan, and Vietnam) to all nations committed to countering IUU fishing. Patrols should model Operation North Pacific Quad, a multi-nation effort which includes the U.S., Canada, Japan, and South Korea on the high seas and within their EEZs.
- Direct the USCG to increase the frequency and scope of training, joint exercises, delegations, and port visits to nations most impacted by IUU fishing. Training and joint exercises should focus on mock boardings and pursuit and interdiction operations. The USCG, alongside the U.S. Navy, can also conduct visit, board, search, and seizure training, and work to procure maritime domain awareness and other Intelligence, Surveillance, and Reconnaissance (ISR) technologies for host nations to promote targeted, intelligence-driven enforcement operations.
- Devise plans to increase U.S. authorities relating to High Seas Boarding Inspections and bilateral ship rider agreements; currently, the U.S. only has HSBI authority in four of the 15 RFMOs it belongs to. Strengthening these HSBI authorities would further enhance the U.S.' ability to close enforcement gaps exploited by the DWF and bolster partner nations' regional maritime governance capabilities. Expanded ship rider agreements should model the CGC Harriet Lane, whose mission includes patrols with partner nations in Oceania and the Pacific region.
- Direct the Department of State, in coordination with the USCG, to expand existing or establish new bilateral agreements in priority regions with partner nations to enable shiprider programs and other cooperative enforcement mechanisms. Strengthening current agreements and establishing new agreements would empower partner nations to better enforce resource conservation and management measures within their EEZs, enhance regional maritime governance, and increase the effectiveness of joint operations. Under U.S. shiprider agreements, maritime law enforcement officers from partner nations may embark on

U.S. government vessels and aircraft, enabling those platforms to enforce partner-nation laws—including boarding and inspection authorities—within designated territorial seas or EEZs. Expanding shiprider and similar frameworks would support capacity building and significantly extend the reach and impact of U.S. efforts to combat IUU fishing in key regions.

- Direct the USCG to expand its international presence by establishing a formal Foreign Area Officer (FAO) program. A dedicated FAO program would support the growing demand for sustained international engagement and strengthened maritime governance capacity among partner nations and would align with the Coast Guard's planned expansion under Force Design 2028. Assigning FAOs to priority countries engaged in combating IUU fishing would highlight the Coast Guard's commitment to combatting IUU fishing and other illicit maritime activity in priority regions, reinforce a whole-of-government approach at U.S. embassies, and enable more frequent Coast Guard joint operations, training, and capacity-building activities in-country.
- Direct the USCG to enhance strategic media engagement in support of international maritime enforcement efforts. A more deliberate media and public affairs approach would amplify the USCG's role in combating IUU fishing, reinforce U.S. leadership in maritime governance, and support partner nations by increasing transparency and public awareness. Aligning media engagement with operational activity, particularly in priority regions, would strengthen whole-of-government messaging, deter illicit actors, and complement the USCG's expanded international presence envisioned under Force Design 2028.
- Require the U.S. Army Corps of Engineers to include data on foreign seafood landings at U.S. ports when prioritizing dredging and maintenance funding under the Water Resources Development Act. Currently, maintenance projects are prioritized based on factors such as shipping volume and economic impact. Factoring in whether ports facilitate the importation of illegal seafood would incentivize compliance with U.S. seafood import standards.[262]

Recommendation 2: Increase the Visibility of the Nexus Between Commercial Fishing and Illicit Maritime Activity

Specifically, Congress should:

- Mandate a 12-month, interagency study—led by the USCG under the auspices of the Maritime Safe Working Group—to map the empirical nexus between Chinese commercial fishing and illicit activity (e.g., trafficking, sanctions evasion, IUU-related crime, maritime coercion); identify a single, designated federal point-of-contact empowered to brief Congress; and deliver a list of prioritized and actionable targets and resource recommendations. The study should produce an unclassified executive summary and a classified annex, include case studies, identify

data gaps, and identify potential statutory or budgetary changes required to remediate the highest-risk vulnerabilities.

- Direct the Office of the Director of National Intelligence to expand maritime domain awareness and intelligence sharing agreements with allies and partners to boost interoperability and improve real-time detection, tracking, and interdiction of IUU fishing.
- Urge the State Department to increase bilateral agreements, particularly in waters without RFMOs such as the Southwest Atlantic.

Recommendation 3: Increase Fisheries Transparency Mechanisms
Specifically, Congress should:

- Direct NOAA to require all fishing vessels, refrigerated transport vessels, and supply vessels to obtain unique identifiers accessible by RFMOs and relevant bodies and work with RFMOs to publish up-to-date listings of key vessel information such as licenses, authorizations, and subsidies.
- Empower the Maritime SAFE working group to lead a global 'Fish for Security' coalition linking fisheries governance to maritime stability.

Recommendation 4: Expand the USG's definition of IUU Fishing to include forced labor, human rights abuses, and violations of conservation and management measures.
Specifically, Congress should:

- Enact legislation amending the definition of IUU fishing to include forced labor, human trafficking, human rights abuses, and violations of conservation and management measures. This would ensure that enforcement mechanisms available to the U.S. government could be triggered on the grounds of forced labor.
- The definition should make clear that IUU fishing includes forced labor, as defined under section 307 of the Tariff Act of 1930, including but not limited to debt bondage, human trafficking, or other forms of coercion, deception, or abuse in the recruitment or employment of crew; vessels involved in misrepresentation, falsification, or concealment of information regarding catch origin, vessel identity, ownership, or licensing, including the use of fraudulent catch documentation, transshipment records, or vessel monitoring data; and intentionally disabling, falsifying, or otherwise interfering with vessel monitoring systems, automatic identification systems, observer programs, or other legally required monitoring and compliance measures.

Recommendation 5: Strengthen the competitiveness of the U.S. seafood industry.
Specifically, Congress should:

- Direct NOAA to strengthen catch-certification requirements that are aligned with the EU and key allies and partners like Japan and South Korea.
- Enact legislation expanding the Maritime Administration's Title XI Federal Ship Financing Program to include commercial fishing and at-sea processing vessels.

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[1] Zhang Shiping, China's Sea Power (Beijing: People's Daily Publishing, 2009). See also Andrew S. Erickson and Lyle J. Goldstein, "Chinese Perspectives on Maritime Transformation," in China Goes to Sea, ed. Andrew S. Erickson, Lyle J. Goldstein, and Carnes Lord (Annapolis, MD: Naval Institute Press, 2009); Yan Youqiang and Chen Rongxing, "PRC Ocean Specialists Explain 'National Ocean Development Project Plan' in 12th Five-Year Program," Beijing Renmin Haijun, April 1, 2013.

[2] Jia Yu [贾宇] & Zhang Xiaoyi [张小奕], The Maritime Strategy of Mao Zedong, Deng Xiaoping and Xi Jinping [毛泽东、邓小平和习近平的海洋战略思想初探], Journal of Boundary and Ocean Studies [边界与海洋研究] (May 1, 2018), https://interpret.csis.org/translations/the-maritime-strategy-of-mao-zedong-deng-xiaoping-and-xi-jinping/.

[3] Cao Wenzhen, "PRC Ocean University International Issues Research Institute Director Links China Dream, Seapower," Zhongguo Haiyang Bao, July 21, 2014.

[4] Yan Youqiang and Chen Rongxing, "Naval Officers on International, Chinese Maritime Strategy," China Military Science, May 20, 1997.

[5] Wu Shicun, "China Won't Accept Cursory Judgment of Its Inherent Rights over SCS," People's Daily, June 20, 2016. Wu asserts that "China's sovereignty and sovereign rights over the SCS…are defined by the struggle against imperialist aggression."

[6] Liang Fang, On Maritime Strategic Access, subsection 1 under section 1, "Status and Role of Maritime Strategic Access in Progress of China's Peaceful Development." Liang describes China as "besieged" by island chains that could become "springboards for foreign aggression" and straits that could turn into "choke points for cutting off supplies."

[7] Zhang Shiping, China's Sea Power, People's Daily Publishing (2009). See also Andrew S. Erickson and Lyle J. Goldstein, "Chinese Perspectives on Maritime Transformation," in China Goes to Sea, ed. Andrew S. Erickson, Lyle J. Goldstein, and Carnes Lord (Annapolis, MD: Naval Institute Press, 2009); Yan Youqiang and Chen Rongxing, "PRC Ocean Specialists Explain 'National Ocean Development Project Plan' in 12th Five-Year Program," Beijing Renmin Haijun, April 1, 2013.

[8] Cao Wenzhen, "PRC Ocean University International Issues Research Institute Director Links China Dream, Seapower," Zhongguo Haiyang Bao, July 21, 2014. *See* also Daniel Tobin's testimony before the U.S.-China Economic and Security Review Commission notes that Xi Jinping has defined national rejuvenation as proving that "scientific socialism is full of vitality in 21st century China" and that "the banner of socialism with Chinese characteristics is now flying high and proud for all to see," establishing China as a model whose system commands moral recognition globally, *see* Daniel Tobin, How Xi Jinping's "New Era" Should Have Ended U.S. Debate on Beijing's Ambitions," Testimony Before the U.S.-China Econ. & Sec. Rev. Comm'n, Hearing on "A 'China Model?' Beijing's Promotion of Alternative Global Norms and Standards," 116th Cong. (Mar. 13, 2020), https://www.uscc.gov/sites/default/files/testimonies/SFR%20for%20USCC%20TobinD%2020200313.pdf.

[9] Andrew S. Erickson & Lyle J. Goldstein, Chinese Perspectives on Maritime Transformation, in China Goes to Sea 521 (Andrew S. Erickson, Lyle J. Goldstein & Carnes Lord eds., Naval Inst. Press 2009), https://www.andrewerickson.com/2009/07/china-goes-to-sea-maritime-transformation-in-

comparative-historical-perspective/; Yan Youqiang & Chen Rongxing, PRC Ocean Specialists Explain "National Ocean Development Project Plan" in 12th Five-Year Program, Beijing People's Navy, (Apr. 1, 2013); Zhang Shiping [张士平], China's Sea Power [中国海权], People's Daily Publ'g House (2009).

[10] Liza Tobin, Underway—Beijing's Strategy to Build China into a Maritime Great Power, Naval War College Review (2018) at 21, https://digital-commons.usnwc.edu/nwc-review/vol71/iss2/5.

[11] Institute of Marine Research Group, China's Ocean Development Report 2010, China Ocean Press (Apr. 2010).

[12] Daniel Hartnett, The Father of the Modern Chinese Navy—Liu Huaqing, Ctr. for Int'l Maritime Sec. (Oct. 8, 2014), https://cimsec.org/father-modern-chinese-navy-liu-huaqing/.

[13] Law of the People's Republic of China Concerning the Territorial Sea and the Contiguous Zone (1992), Lehman Law, https://www.lehmanlaw.com/ (last visited Dec. 8, 2025).

[14] Thomas J. Bickford, with Heidi A. Holz & Frederic Vellucci Jr., Uncertain Waters: Thinking About China's Emergence as a Maritime Power, CNA (Sept. 2011), https://apps.dtic.mil/sti/tr/pdf/ADA552565.pdf.

[15] Specifically, he tasked the PLA with "defending China's sovereignty over its territory, airspace, and territorial waters and maritime rights and interests," embedding the newly codified legal concept directly into the military's requirements, *see* Jiang Zemin's Report to the 14th National Congress of the Chinese Communist Party [江泽民在中国共产党第十四次全国代表大会上的报告], People's Daily Online [人民网] (Oct. 12, 1992), https://cpc.people.com.cn/GB/64162/64168/64567/65446/4526308.html.

[16] Zhang attributes the concept of "near seas [近海]" as central to China's maritime strategy, *see* Zhang Shiping, China's Sea Power, People's Daily Publ'g House at 128 (2009). Yoshihara and Holmes note that while Chinese publications often translate 近海 as "offshore," the more accurate rendering is "near seas," and—citing Adm. Liu Huaqing—that this zone includes the Yellow Sea, East China Sea, South China Sea, the Spratly Islands, and waters along and beyond the Taiwan–Okinawa island chain into the northwestern Pacific; they further highlight that the concept is intentionally malleable to expand with the PLA Navy's capabilities, *see* Toshi Yoshihara & James R. Holmes, Red Star over the Pacific, Naval Inst. Press at 24–25 (2010). See also David M. Finkelstein, China's National Military Strategy: An Overview of the "Military Strategic Guidelines," in Right-Sizing the People's Liberation Army: Exploring the Contours of China's Military at 91–93 (Roy Kamphausen & Andrew Scobell eds., Strategic Studies Inst., U.S. Army War Coll. Sept. 2007), https://press.armywarcollege.edu/cgi/viewcontent.cgi?article=1071&context=monographs.

[17] Ministry of Foreign Affs. of the P.R.C., White Paper on China–Philippines Dispute in South China Sea (July 13, 2016), https://www.fmprc.gov.cn/nanhai/eng/snhwtlcwj_1/201607/t20160712_8527294.htm.

[18] State Council Information Office of the People's Republic of China, Diaoyu Dao, an Inherent Territory of China (Sept. 25, 2012), https://www.mfa.gov.cn/mfa_eng/zy/jj/diaodao_665718/pl/202406/t20240606_11378063.html.

[19] PRC Pursues Maritime Development Strategy, Xinhua (May 28, 1998).

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[21] PRC Maritime Official Pledges to Protect Sea Resources, China Daily (May 16, 2001).

[22] According to Liza Tobin, "建设海洋强国" is "build [a] maritime great power," or "build [China] into a maritime great power" This article uses these various terms interchangeably "Maritime great power" (海洋强国) also could be translated "strong maritime nation" or simply "maritime power," *see* Liza Tobin, Underway—Beijing's Strategy to Build China into a Maritime Great Power, Naval War College Review (2018), https://digital-commons.usnwc.edu/nwc-review/vol71/iss2/5. For early documents, *see* State Council Notice on Issuing National Maritime Economic Development Plan Outline [国务院关于印发全国海洋经济发展规划纲要的通知], State Council [国务院] (May 9, 2003), https://www.gov.cn/gongbao/content/2003/content_62156.htm.

[23] Full text of Hu Jintao's Report at the 18th Party Congress, Xinhua (Nov. 17, 2012), https://web.archive.org/web/20121127193750/http://news.xinhuanet.com/english/special/18cpcnc/2012-11/17/c_131981259.htm. For more detailed analysis, *see* Liza Tobin, Underway—Beijing's Strategy to Build China into a Maritime Great Power, Naval War College Review (2018), https://digital-commons.usnwc.edu/nwc-review/vol71/iss2/5.

[24] Ibid.

[25] In a July 2013 Politburo study session, Xi argued that building a Maritime Great Power was essential to achieving China's two centenary goals: completing a "moderately prosperous society" by 2021 and realizing "national rejuvenation" by 2049, *see* Xi Jinping at the 8th Politburo Study Session Emphasizes Continuing Being Concerned with the Ocean, Knowing the Ocean, and Planning and Controlling the Ocean, to Unceasingly Make New Achievements in Promoting the Building of Maritime Great Power [习近平：要进一步关心海洋、认识海洋、经略海洋], Xinhua News [新华网] (July 31, 2013), http://www.xinhuanet.com/politics/2013-07/31/c_116762285.htm.

[26] Vision for Maritime Cooperation under the Belt and Road Initiative, Xinhua (June 20, 2017), http://www.xinhuanet.com//english/2017-06/20/c_136380414.htm.

[27] Toward a More Beautiful China and Cleaner World: Understanding Xi Jinping Thought on Ecological Civilization, National High-Level Think Tank of the Xinhua News Agency, The Research Center for Xi Jinping Thought on Ecological Civilization (Jan. 2025), https://web.archive.org/web/20250420135400/http://marxism.cass.cn/en/marxist/202501/P020250109378704201145.pdf; Global Ocean Governance and Ecological Civilization:Building a Sustainable Ocean Economy for China, CCICED Special Policy Study Report (Sept. 2020), http://en.cciced.net/POLICY/rr/prr/2020/202009/P020200916750698907787.pdf.; and Building a Shared Future for All Life on Earth:China in Action, Ministry of Foreign Affairs of the People's Republic of China (Sep. 21, 2020), https://www.mfa.gov.cn/eng/wjb/zzjg_663340/tyfls_665260/tfsxw_665262/202406/t20240606_11405496.html.

[28] Full text of Xi Jinping's report at 19th CPC National Congress, Xinhua (Oct. 18, 2017), https://web.archive.org/web/20250427062040/https://www.chinadaily.com.cn/china/19thcpcnationalcongress/2017-11/04/content_34115212.htm; and Authorized announcement from the 19th CPC National Congress: The 19th National Congress of the Communist Party of China concludes in Beijing [十九大受权发布:中国共产党第十九次全国代表大会在京闭幕], Xinhua [新华] (Oct. 24, 2017), https://web.archive.org/web/20240801073827/http://www.xinhuanet.com/politics/19cpcnc/2017-10/24/c_1121848930.htm. The BRI was later written into the Party Constitution, *see* "Belt and Road" incorporated into CPC Constitution, Xinhua (Oct. 24, 2017), http://www.xinhuanet.com/english/2017-10/24/c_136702025.htm.

[29] The "Community of Common Destiny [命运共同体]" is a Chinese foreign policy concept that envisions reshaping the global order to accommodate China's rise and can be understood as recreating the CCP's domestic arrangement of the party's domination and control on the international stage. The 2023 white paper on distant-water fisheries explicitly extends this framework to the seas, tying China's DWF fleet to the goal of building a Maritime Community of Common Destiny. See The White Paper on the Development of China's Distant-Water Fisheries (Full Text) [中国的远洋渔业发展白皮书(全文)], State Council Information Office [中华人民共和国国务院新闻办公室]

(Oct. 2023), https://archive.ph/KY73w; Jointly Build a Maritime Community of Common Destiny [共同构建海洋命运共同体], Xinhua News Agency [新华社] (Apr. 23, 2019), http://web.archive.org/web/20250930224317/https://www.gov.cn/xinwen/2019-04/23/content_5385580.htm; and Chu Jianguo [储建国], Dialectical Relationship Between Maritime Power and a Maritime Community with a Shared Future — From the Perspective of a Grand Historical Outlook [海洋强国和海洋命运共同体的辩证关系——基于大历史观的视角], National Governance [国家治理] (Nov. 8, 2022), https://web.archive.org/web/20250723134826/https://www.rmlt.com.cn/2022/1108/659677.shtml.

[30] Between 2013 and 2018, Beijing merged its maritime law-enforcement bodies into the China Coast Guard, shifted the Coast Guard under the Central Military Commission, dissolved the State Oceanic Administration, and folded the Maritime Rights Leading Small Group into the Central Foreign Affairs Commission—moves Chinese sources described as necessary to unify diplomacy, resource management, and coercive enforcement under Party control, see Liza Tobin, Wind in the Sails: China Accelerates Its Maritime Strategy, War on the Rocks (May 9, 2018), https://warontherocks.com/2018/05/wind-in-the-sails-china-accelerates-its-maritime-strategy/.

[31] Ministry of Agriculture and Rural Affairs Convenes Symposium with Distant Water Fishery Enterprises to Deeply Advance High-Quality Development of Distant Water Fisheries [农业农村部召开远洋渔业企业座谈会深入推进远洋渔业高质量发展], Ministry of Agriculture and Rural Affairs Information Office [农业农村部新闻办公室] (Mar. 13, 2025), https://web.archive.org/web/20251124174015/https://www.moa.gov.cn/xw/zwdt/202503/t20250313_6471727.htm.

[32] Prime Minister of Guinea-Bissau Presents an Honorary Certificate to Our Distant-Water Fishing Enterprise [几内亚比绍总理为我远洋渔业企业颁发荣誉证书], Ministry of Agriculture and Rural Affairs Information Office [农业农村部新闻办公室] (Apr. 29, 2024), https://www.moa.gov.cn/xw/zxfb/202404/t20240429_6454655.htm; Feature Story丨Chinese Distant-Water Fishing Fleet Pursuing Dreams in West Africa [通讯丨逐梦西非的中国远洋捕捞队], Xinhua News [新华网] (Feb. 5, 2025), http://web.archive.org/web/20251012195521/http://www.xinhuanet.com/20250205/b5524ea7571a4039b42e195298f0811e/c.html.

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[34] Peter C. Oleson, Using Intelligence to Counter Illegal, Unreported, and Unregulated Fishing, Studies in Intelligence (Mar. 2023) at 6, https://www.cia.gov/resources/csi/static/1-Intelligence-on-the-High-Seas.pdf.

[35] Beijing officially claims 2,551 licensed vessels, but independent analysis places the actual count above 16,000 once flag-of-convenience operations and ships in disputed "near seas" are included. See Foreign Governments' Use of Their Distant Water Fishing Fleets as Extensions of Their Maritime Security Forces and Foreign Policies, Office of Naval Intelligence (June 2021), https://www.oni.navy.mil/Portals/12/reading_room/20210616_Congressional%20Report_Final%20-%20%2019AUG21.pdf; Development of China's Distant-Water Fisheries, The State Council Information Office, People's Republic of China (Oct. 24, 2023),

https://web.archive.org/web/20251125145738/https://www.scio.gov.cn/zfbps/zfbps_2279/202310/t20231024_775875.html; Miren Gutierrez, Alfonso Daniels, Guy Jobbins, Guillermo Gutierrez Almazor & César Montenegro, China's Distant-Water Fishing Fleet: Scale, Impact and Governance, Overseas Development Institute, London (June 2, 2020), https://odi.org/en/publications/chinas-distant-water-fishing-fleet-scale-impact-and-governance/.

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they often cannot field alone, *see* U.S. Indo-Pacific Command Office of the Staff Judge Advocate & U.S. Pacific Fleet Legal Office, Illegal, Unreported, and Unregulated Fishing (TACAID Series, Oct. 23, 2023) (on file with H. Select Comm. on Strategic Competition Between the U.S. and the Chinese Communist Party).

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[190] Rongsense Group has received Xinjiang workers through government labor transfer programs since 2017, according to a 2021 corporate press release. Additionally, a 2017 Xinjiang Daily article says that at least one Uyghur was working at Rizhao Rongxin Aquatic Products Co Ltd, a former name of Shandong Rongxin Aquatic Food Group Co Ltd, a Rongsense Group company. *See* A delegation led by Luo Xiang, Deputy Secretary-General of the Kashgar Prefecture Administrative Office in Xinjiang, visited our company [在鲁新疆籍万名务工经商人员齐亮剑], Rongxin Group [榮信集團] (April 1, 2021), https://archive.is/8L5JH#selection-135.14-138.0; and Ten thousand Xinjiang migrant workers and business people in Shandong Province are taking action [在鲁新疆籍万名务工经商人员齐亮剑], People's Political Consultative Conference Daily [人民政协报社] (June 21, 2017), https://web.archive.org/web/20231206214400/https://www.rmzxb.com.cn/c/2017-06-21/1606376.shtml

[191] At least four Uyghurs were working at Yantai Longwin Food Co. Ltd. between 2021 and 2023, *available at* https://docs.google.com/spreadsheets/d/1f3osTfdT9MaOownLWblR8HtKLjrk_r6_vwAOTalfkpw/edit#gid=0.

[192] At least five Uyghurs were identified working at Qingdao Lian Yang Aquatic Product facilities via Douyin since April 2022 and as recently as April 2023 *available at* https://drive.google.com/file/d/1XKyUe6CcNjGqHBiH4i4aPC1t43jy9Mfa/view. Videos from Douyin show Uyghurs at a seafood processing facility wearing uniforms that say "Tianyuan-Lian Yang", which is a combination of Qingdao Lian Yang and its parent company, Qingdao Tianyuan, *available at* https://drive.google.com/file/d/1QrCIjQG-RhRzUUQHSOZF8IpPULOYWi7O/view

[193] At least five Chinese seafood conglomerates directly linked to the hiring of ethnic-minority labor from Xinjiang have exported a total of 47,861 tons of seafood products to importers in North America since 2018. (1) Four subsidiaries of the Shandong Meijia Group have exported a total of 3,224 tons of seafood products, including to suppliers of supermarket chains like Hmart Group. (2) Yantai Sanko Fisheries Co. Ltd. has exported approximately 4,980 tons of seafood products to over 20 companies since 2018, including the "the largest prepared seafood processing operation in North America." Yantai Longwin, which is connected to Yantai Sanko through corporate ownership and directorship, has exported 84 tons of seafood products to two companies in North America since 2018. (3) The Chishan Group, a Chinese conglomerate with interests in the fishing, seafood processing, real estate, tourism, and finance sectors, has exported to the United States through five subsidiary processing facilities. These subsidiaries have exported approximately 28,085 tons since 2018. (4) Qingdao Tianyuan Aquatic Products has exported a total of 9,717 tons of seafood products to the United States since 2018, including a supplier of a seafood fast food chain with outlets across the southeastern and midwest United States. Qingdao Lian Yang Aquatic Product, a wholly-owned subsidiary of Qingdao Tianyuan, has exported a total of 1251 tons of seafood products to North American companies since 2018. (5) Three subsidiaries of the Shandong Rongsenes Group have exported a total of 516 tons to importers in North America since 2018. See master sheet of trade data since 2018 for all Uyghur-linked Chinese exporters *available at* https://docs.google.com/spreadsheets/d/13k-ocWMiFDKVgP9rqEDNZSusw8F0dmgq0VFX2k6hIjo/edit?gid=431735931#gid=431735931

[194] Bills of lading from ImportGenius show that nine companies, including Shandong Haidu Ocean Products Co. Ltd., Rongcheng Haibo Seafood Co. Ltd., Rongcheng Jinyuan Aquatic Food, Rongcheng Runtong Aquatic Co. Ltd., Shandong Shuangdu Ocean Product Co. Ltd., Rongcheng Jiamei Seafood Co. Ltd., Shandong Lanrun Aquatic Co. Ltd., Rizhao Jia Tian Xia Foods Co. Ltd., and Rizhao Meijia Aquatic Foodstuff Co. Ltd. shipped 23,896,518 kg of squid to the United States between January 2018 and December 2022. This represents 17.6 percent of the 140,017,910 kg of squid imported into the United States from China in the same time period, according to fishery trade data maintained by National Oceanic and Atmospheric Administration (NOAA) *available at* https://www.fisheries.noaa.gov/foss/f?p=215:200:5335493415995:Mail:::: Analysis of squid imports into the United States between 2018 and 2022 *available at*

https://docs.google.com/spreadsheets/d/1N02O1aphty7os80hjzpyibG_pgOgmmhjFRNJdx-Zerw/edit?gid=2032232709#gid=2032232709

[195] Wages in Chinese yuan are converted to U.S. dollars for purposes of comparison on the 2023 average of 1:7 between U.S. dollars and Chinese yuan.

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[197] ASC is based on the MSC for the purposes of audit efficiency and the 13 MSC and ASC certifications held by the Chinese sites are chain of custody, reflecting the fact they aren't harvesting or farming seafood but processing and handling it. The ASC certified sites are: **Rongcheng Haibo** Seafood Co. Ltd. (ASC-C-03831), **Rizhao Meijia Keyuan** Foods Co. Ltd. (ASC-C-02356); Shandong Haidu Ocean Product Co. Ltd (ASC-C-02486); **Rizhao Jiayua**n Foodstuff Co. Ltd. (ASC-C-02663), *available at* https://drive.google.com/file/d/1PXmsxXyKUISAl-gWjrmkcPmmga9fq8Yd/; and Shandong Meijia Group Co. Ltd. (ASC-C-02843). The nine processing facilities directly connected to the use of Uyghur labor that are currently certified MSC sites are: Shandong Haidu Ocean Product Co. Ltd (MSC-C-57659) *available at* https://drive.google.com/file/d/1kJm9voyXJwGyi-hWTi2eUScVMq4LfC28/view; Rongcheng Haibo Seafood Co., Ltd. (MSC-C-59738) *available at* https://drive.google.com/file/d/1WwOxJFnRmhZqSxWN6fJUktH58xL2Ib3D/view; Qingdao Tianyuan Aquatic Foodstuffs Co., Ltd. (MSC-C-52638) https://drive.google.com/file/d/1Rynnjzq8BcdvFH9BPxD7VFL2Gub8koQd/view; Qingdao Lian Yang Aquatic Product Co. Ltd. (MSC-C-50870) *available at* https://drive.google.com/file/d/1SgEIXX_JDc9rLdvisiECo7yBqL5Fm4Hq/view; Rizhao Meijia Keyuan Foods Co., Ltd. (MSC-C-53370) https://drive.google.com/file/d/1oYlJRKqdc1EathSwWC7DXga9jTf4UVui/view; Shandong Meijia Group Co., Ltd. (MSC-C-51912) *available at* https://drive.google.com/file/d/1bfLN1RwPYjhM_shsvOfC3JlU_VxMDbW5/view; Yantai Sanko Fisheries Co., Ltd. (MSC-C-51794) *available at* https://drive.google.com/file/d/1ICXYpPUKkHd95Ksrid0Du43gf1CEWtRV/view; Rizhao Rirong Aquatic Products And Foods Co Ltd (MSC-C-55351) and Rizhao Rongxing Co Ltd (MSC-C-53499). Additional processing facilities of interest that are not directly connected to Uyghur labor but are MSC certified include: Rongcheng Taiming Foods Co., Ltd. (MSC-C-57091) *available at* https://drive.google.com/file/d/1slyHyvGevhnlpVUGct3fpP-zYQ7nIkw1/view; Rongcheng Huiying Foods Co., Ltd. (MSC-C-57161) *available at* https://drive.google.com/file/d/1sqw3K8NGZrqMi2Mx5vK7ctfnXY35izsZ/view; and Shandong Lanrun Aquatic Co., Ltd. (MSC-C-57565) *available at* https://drive.google.com/file/d/1A9CZGYyrJ9J3LKrCBQatZy1vdlgO0ZB4/view, Two more seafood processing plants owned by Taixiang Group (Rongcheng Taida Elite Food Products Co., Ltd and Rongcheng Taixiang Food Products Co., Ltd) previously held MSC certifications, *available at* https://drive.google.com/file/d/1J64FfOp7yOs28TjRFys_PsRkH-Xaup39/view and https://drive.google.com/file/d/1RAARDxV0Bps4a4YLNrViZ3JOH6dW4D23/view.

See https://drive.google.com/file/d/1782GIgtcsu3MRf6GabUPpd94wUNMNvBe/view;

[198] Dr. Yemi Oloruntuyi, current Head of Social Policy at the MSC said in 2019 that new requirements for seafood suppliers and processors, including a need for social audits, would "provide seafood buyers and consumers with greater assurances that companies involved in processing and packing MSC and ASC certified seafood do not employ forced or child labour." *See* Marine Stewardship Council, New measures introduced to combat forced and child labour in seafood businesses (March 28, 2019), https://www.msc.org/media-centre/press-releases/press-release/new-measures-introduced-to-combat-forced-and-child-labour-in-seafood-businesses

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