

# OUT OF SIGHT, OUT OF CONTROL

## SUMMARY: UK

**The Environmental Justice Foundation (EJF)** works internationally to inform policy and drive systemic, durable reforms to protect and restore our natural world and defend human rights.

We investigate and expose abuses and support environmental defenders, Indigenous peoples, communities and independent journalists on the frontlines of environmental injustice. Our investigators, researchers, filmmakers and campaigners work with grassroots partners and environmental defenders across the globe to secure sustainable, peaceful and equitable futures.

### HEADLINE STATS FROM THE REPORT:

- + EJF investigations into unregulated high seas squid fisheries reveal how governance vacuums across the Northwest Indian, Southwest Atlantic, and Southeast Pacific Oceans are fuelling rampant destructive fishing and egregious human rights abuses. These three squid fisheries make up approximately 60% of the global supply.
- + EJF interviewed 431 fishers from Indonesia and the Philippines who had worked on 249 unique DWF squid vessels operating in these three fisheries between 2020 and 2025. 70% of these vessels were flagged to China, 16% to Taiwan, and 14% to South Korea.
- + Fishers working on China's squid vessels described abuses that were consistently worse than on South Korean or Taiwanese-flagged vessels. 60% of Chinese vessels were alleged to have undertaken shark finning, 53% in the catching of vulnerable megafauna and 18% in unauthorised fishing. Chinese vessel shark finning rates were 7x higher than Korean vessels and 3.4x higher than Taiwanese vessels.
- + The presence of forced labour forms a baseline for employment on DWF squid vessels. China's fleet ranked the worst for living and working conditions on vessels with over 92% of interviewees reporting at least seven indicators of forced labour during their time onboard. This compares with 82% for Taiwanese vessels and 16% for South Korean vessels.
- + The Northwest Indian Ocean stands out as the most destructive squid fishing ground in the study. 62% of vessels conducted shark finning and 66% of vessels caught vulnerable megafauna.
- + 25 deaths were reported on 20 vessels. All of these were flagged to China. At least nine deaths (36% of total deaths) were suspected to be due to beriberi - a disease caused by a severe vitamin deficiency that was widespread on merchant and navy ships in the 1800s.<sup>1</sup>
- + At-sea trans-shipment is now an almost ubiquitous fishing practice amongst squid vessels. 97% out of 431 fishers told EJF that their vessel would trans-ship catch at sea rather than unload into port.

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<sup>1</sup>Hawk, A. (2006) The Great Disease Enemy, Kak'ke (Beriberi) and the Imperial Japanese Army, [https://www.researchgate.net/publication/7106648\\_The\\_Great\\_Disease\\_Enemy\\_Kak'ke\\_Beriberi\\_and\\_the\\_Imperial\\_Japanese\\_Army](https://www.researchgate.net/publication/7106648_The_Great_Disease_Enemy_Kak'ke_Beriberi_and_the_Imperial_Japanese_Army)

- + Fishing trip length had the strongest relationship with the prevalence of labour abuses. Fishers who stayed at sea for more than 24 months recorded physical violence rates of 67% compared to 17% for trips lasting less than six months.
- + Shark finning rates increased by 143% based on whether a vessel was at sea for less than six months or if it was at sea for 13-24 months. The capture of any kind of vulnerable megafauna also increased by 140% based on these parameters.
- + The number of Chinese-flagged reefers engaged in the at-sea trans-shipment of seafood has grown from 15 vessels in 2020 to 58 in 2025 – equal to a 287% increase.
- + Between 2020 and 2024, China was the world's largest exporter of squid and cuttlefish, accounting for approximately 27% of global exports.<sup>2</sup> On the import side, the EU was the world's largest market for squid and cuttlefish in the same period, accounting for approximately 29% of global imports.

## WHY THIS MATTERS FOR THE UK:

- + In 2024, the UK was the top importer of squid and cuttlefish in Northern Europe.<sup>3</sup> The majority of these imports come from China, which supplied 42% of UK squid imports in 2024, valued at almost €9.3 million.<sup>4</sup>
- + Between 2023 and 2024 – the latest years we have data for – total squid imports to the UK increased by 19.2%.<sup>5</sup>
- + While China ranks as the worst performer globally for IUU fishing according to the IUU Fishing Risk Index,<sup>6</sup> the UK failed to verify a single Chinese catch certificate in 2023 or 2024<sup>7</sup> and has only refused four seafood consignments from China on IUU fishing grounds since 2012 (see Section 4).<sup>8</sup> As such, there is a strong likelihood of squid tainted by IUU fishing and/or human rights abuses making its way onto the UK market.

## PARLIAMENTARY QUESTIONS ON THE UK'S APPROACH TO SCRUTINY OF SQUID IMPORTS

### Question 1:

To ask the Secretary of State for Environment, Food and Rural Affairs, what assessment she has made of the risk that jumbo flying squid imported from fisheries in the South Pacific and Argentine shortfin squid imported from the South West Atlantic may be linked to illegal, unreported and unregulated fishing and human rights abuses.

<sup>2</sup> UN Comtrade (2024) HS commodity codes 030741, 030742, 030743, 030749 and 160554. These commodity codes include trade in both cuttlefish and squid.

<sup>3</sup> UN Comtrade. Northern European states 2024 reported imports of: cuttlefish and squid, whether in shell or not, live, fresh or chilled (030741/030742); cuttlefish and squid, whether in shell or not, frozen (030743); cuttlefish and squid, smoked, dried, salted or in brine, with or without shell (030749); cuttlefish and squid, prepared or preserved (excluding smoked) (160554). UN Comtrade Database (n.d.) 'Trade Data', <https://comtradeplus.un.org/TradeFlow?Frequency=A&Flows=M&CommodityCodes=TOTAL&Partners=826&Reporters=all&period=2024&AggregateBy=none&BreakdownMode=plus> (accessed 04 August 2025).

<sup>4</sup> This data is still provisional and subject to change as of July 2025. Seafish (n.d.) 'Seafish Trade & Tariff Tool', Seafish (n.d.) 'Seafish Trade & Tariff Tool', <https://public.tableau.com/app/profile/seafish/viz/SeafishTradeandTariffTool/Homepage> (accessed 30 April 2026).

<sup>5</sup> Ibid

<sup>6</sup> IUU Fishing Risk Index (2023) '2023 Results: All responsibilities', <https://iuufishingindex.net/ranking> (accessed 15 April 2025).

<sup>7</sup> Marine Management Organisation (2025) UK catch certificate data. Responses provided under the Environmental Information Regulations 2004, 12-25 March 2025.

<sup>8</sup> EU IUU Fishing Coalition (n.d.) 'EU Member States Biennial Reports', <https://www.iuuwatch.eu/the-iuu-regulation/member-stateimplementation/> (accessed 26 March 2025); Marine Management Organisation (2025) UK catch certificate data. Responses provided under the Environmental Information Regulations 2004, 12-25 March 2025

**Answer:**

The Government is committed to tackling illegal, unreported and unregulated (IUU) fishing and addressing associated human rights abuses in global seafood supply chains. The UK has robust regulations in place, including catch certification and traceability requirements, to prevent fish caught through IUU practices from entering the UK market.

The Government currently has no plans to increase specific scrutiny of squid imports from China, nor have we undertaken a species-specific risk assessment of jumbo flying squid or Argentine shortfin squid. This reflects our assessment that existing controls apply equally across relevant imports and provide appropriate safeguards proportionate to the level of risk identified. Defra will keep its approach under review.

In relation to the South-West Atlantic, Defra continues to seek progress on establishing more coordinated management of high seas fishing activity through relevant international fora. The Government liaise closely with the Falklands Islands Government in relation to this.

**Question 2:**

To ask the Secretary of State for Environment, Food and Rural Affairs, whether her Department is taking steps to increase scrutiny of squid imports from China.

**Answer:**

The answer provided was the same as the response to the first question.

**Reflections:**

This aligns with our understanding that the UK does not provide any guidance or instruction to Port Health Authorities regarding IUU fishing risk-based approaches to identifying seafood consignments for scrutiny at the border.

## WHAT SHOULD THE UK DO ABOUT IT?

- + Improve transparency and accountability in the UK's squid supply chain, including by endorsing and implementing the Global Charter for Fisheries Transparency.
- + Urgently review, strengthen, and adapt current import controls for squid, with a focus on species like Argentine shortfin squid linked to unregulated fisheries.
- + Significantly increase verification checks of catch certificates accompanying squid imports to the UK to ensure they are not coming from unregulated fisheries.
- + Ensure Port Health Authorities are using risk-based approaches to identifying seafood consignments for scrutiny at the border, with all squid imports from China treated as high-risk for IUU fishing
- + Work with other major seafood markets such as the EU to improve oversight of squid imports across the board and prevent “control shopping.”
- + Use multilateral processes — including FAO COFI, existing RFMOs processes, the BBNJ Agreement, and the WTO Agreement on Fisheries Subsidies (Article 5 obligations) — to advance binding measures against unregulated DWF squid fishing across the world.