



Exposing the Gap Between PRC Rhetoric and Illicit Maritime Activity: Case Study Compilation

Ryan Loomis and Heidi Holz

Approved for public release. Unlimited distribution.

Abstract

This compilation of 15 case studies examines the apparent gaps between the People's Republic of China's (PRC) policy and rhetoric regarding its role in the transnational maritime environment and the illicit activities that PRC actors reportedly conduct. The illicit maritime activities allegedly carried out by PRC actors inflict economic and environmental damage on coastal nations, violate their sovereignty, and harm their citizens. These alleged illicit activities are at odds with Beijing's official rhetoric expressing support for international maritime laws, rules, and norms. To develop a better understanding of this apparent contradiction, CNA examined 15 instances in which PRC actors were accused of carrying out illicit activities between 2018 and 2021 in the maritime areas surrounding Southeast Asia, the Atlantic coast of Africa, and Pacific Island Countries. In all but one case, Beijing sought to minimize any negative impact on China's image by denying or downplaying the accusations that PRC actors had engaged in illicit behavior. This PRC strategy of denying and downplaying bad behavior is problematic and could create the appearance that, rather than acknowledging and addressing the illicit behavior of some PRC actors, Beijing is publicly subverting international rules, laws, and norms.

This document contains the best opinion of CNA at the time of issue.
It does not necessarily represent the opinion of the sponsor or client.

Distribution

Approved for public release. Unlimited distribution.

This work was performed under Cooperative Agreement/Grant Award Number: SGCEPD19CA0026.

This project has been supported by funding from the U.S. Department of State.

Cover image credit: Shutterstock with modifications by Kimberly Dillon

Approved by:

December 2021



Maryanne Kivlehan-Wise
Director, China Studies Program
CNA China & Indo-Pacific Security Affairs Division

Request additional copies of this document through inquiries@cna.org.

Contents

Introduction	2
1. Reports of PRC vessels dumping sewage in Philippine EEZ.....	3
2. Illegal harvest of sea cucumber by PRC vessel in Palau EEZ.....	4
3. Forced Indonesian labor on board PRC-flagged vessels	5
4. PRC vessels detained for illegal fishing in Vanuatu EEZ	6
5. PRC vessels engaging in illegal fishing in Gabon	7
6. Pollution from PRC-owned fishmeal factories in Gambia	8
7. Illegal ownership of Ghana’s fishing trawler fleet	9
8. Illegal entering and anchoring in Malaysia’s territorial waters.....	10
9. PRC harvesting giant clams in Philippine-administered waters	11
10. PRC research vessel operating “dark” in Indonesian waters	12
11. PRC trawler in Mauritania restricted area rams local boat.....	13
12. Namibia investigates PRC vessels for illegal entry and fishing	14
13. PRC nationals smuggled into Cambodia by sea.....	15
14. Tampering with Automatic Identification Systems.....	16
15. PRC vessels allegedly ramming foreign fishing vessels	18
References.....	20
Endnotes	45

Introduction

In recent years, persons, vessels, and corporations based in or tied to the People's Republic of China (PRC) have reportedly engaged in illicit maritime activities around the globe. International news media, nongovernmental organizations (NGOs), and foreign governments have all published reports detailing persistent illicit maritime activity involving PRC actors, including PRC nationals, PRC-based criminal organizations, PRC-flagged vessels, and vessels beneficially owned by PRC entities (a beneficial owner enjoys the benefits of ownership even though the title to the property is in another name) PRC-flagged vessels, vessels beneficially owned by PRC entities, and PRC-based criminal organizations.¹ The alleged illicit maritime activities of PRC actors are often at odds with Beijing's rhetoric expressing support for international maritime laws (including the United Nations Convention on the Law of the Sea, or UNCLOS), rules, and norms. Unless addressed, this gap between Beijing's rhetoric and the behavior of PRC actors has the potential to undermine the global system of international laws, norms, and conventions that govern the maritime domain.²

To examine possible contradictions between the PRC's official rhetoric and the illicit transnational maritime activities reportedly carried out by PRC-based actors, CNA examined 15 cases in which PRC actors have been accused of illegal behavior in the maritime domain between 2018 and 2021. These cases are geographically focused in the maritime areas surrounding Southeast Asia, the Atlantic coast of Africa, and the Pacific Island countries. For each case, we examined the following:

- The alleged illegal PRC activity and the types of PRC actors involved
- PRC official policies and narratives about that type of activity (e.g., illegal, unregulated, and unreported (IUU) fishing or human trafficking)
- International, local, and PRC laws, policies, and norms at risk of subversion by the alleged activity
- PRC officials' and media responses to these incidents

Data sources for these case studies included PRC official statements, PRC foreign-directed and domestic media, local news media reports in countries affected by the alleged PRC behavior, maritime domain awareness and vessel tracking databases, subject matter experts, maritime law and regulation databases, and secondary literature published by nongovernmental and other research organizations. This document contains overviews of each of the 15 cases.¹

¹ For CNA's cross-case analysis, see the *Exposing the Gap Between PRC Rhetoric and Illicit Maritime Activity: Summary Report*, available at www.cna.org. Translations of select case studies into Arabic, Bahasa Indonesian, Khmer, Filipino (Tagalog), French, and Malay are also available on CNA's website.

1. Reports of PRC vessels dumping sewage in Philippine EEZ

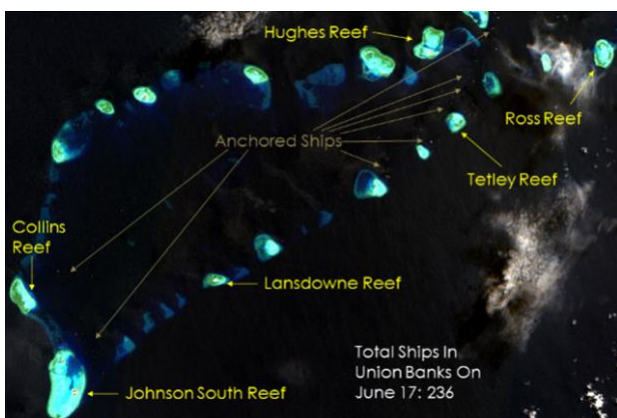


Image source: Similarity.

This image is from a Similarity report showing chlorophyll-a “blooms” around ships, visible in multi-spectral images. Similarity’s analysis suggests that PRC vessels have been dumping sewage into the waters around the Spratly Islands and causing damage to the marine environment.

Alleged PRC Activity	What the PRC says about the activity
<p>A July 2021 report by Similarity, a US-based commercial imagery analysis company, found that more than 200 vessels at anchor in the Spratly Islands were dumping sewage into the water.³ Similarity assessed that the vessels at anchor in the Union Banks in June were dumping roughly 2,596 pounds of sewage per day into the water.⁴ The report claims that the vessels were discharging un- or under-treated sewage into the shallow waters, leading to chlorophyll-a blooms. These blooms, which Similarity said were visible in satellite imagery, may lead to hypoxic ocean conditions that can harm marine organisms and ecosystems.⁵ The report also asserted that these vessels were likely the same PRC vessels that the Philippine Coast Guard had observed in the same location weeks earlier.⁶ The Philippine government is independently investigating Similarity’s claims.</p>	<ul style="list-style-type: none"> • PRC media reporting published in languages spoken by residents of the South China Sea region portrays the PRC as a responsible steward of the marine environment.⁷ • For example, a 2021 article published by China Radio International’s (CRI’s) Bahasa Indonesian service describes China’s regional cooperation in efforts to protect the marine environment and fisheries.⁸ • In response to Similarity’s report, the PRC Ministry of Foreign Affairs (MFA) and the PRC embassy in the Philippines condemned the allegations as “fake news.”⁹ • PRC media directed at audiences in the region similarly portrayed the report as an attempt to smear China.¹⁰

Laws, rules, and norms at risk	
Based on these reports, the following laws and conventions may be at risk of subversion by PRC-based actors:	
International Conventions	<ul style="list-style-type: none"> • International Convention for the Prevention of Pollution from Ships (MARPOL).¹¹ • London Dumping Convention of 1972 and Protocols¹²
Regional Fishery Provisions	<ul style="list-style-type: none"> • The Western and Central Pacific Fisheries Commission marine pollution provisions¹³
Philippines Laws	<ul style="list-style-type: none"> • The Marine Pollution Law (PD 1976)¹⁴ • The Philippine Fisheries Code • The Clean Water Act of 2004
PRC Laws, Policy¹⁵	<ul style="list-style-type: none"> • Regulations on the Control of Ship Pollutants in the Marine Environment¹⁶ • Water Pollutant Discharge Standards for Ships¹⁷

2. Illegal harvest of sea cucumber by PRC vessel in Palau EEZ



The Chinese fishing vessel Qiong Sanya Yu in Malakal, Palau, after Palau Maritime patrol vessel Remeliik II (background) intercepted it poaching sea cucumber near Helen Reef, within Palau's exclusive economic zone (EEZ) on December 10, 2020.

Image source: Richard Brooks, *Island Times*.

Alleged PRC activity	What the PRC says about the activity
<p>In December 2020, Palau media outlets reported that a Palau Maritime Law Enforcement patrol vessel intercepted the PRC-flagged fishing vessel <i>Qiong Sanya Yu</i> for suspected illegal harvesting of sea cucumber at Helen Reef, within Palau's territorial waters and EEZ.¹⁸ The US Coast Guard assisted Palau maritime authorities with locating the PRC vessel.¹⁹ The Palau Ministry of Justice (MOJ) found evidence that the crew of the <i>Qiong Sanya Yu</i> poached 225 kilograms (496 pounds) of sea cucumber valued at roughly \$180,000 US dollars (USD).²⁰ The 28-member crew—all PRC nationals—accepted a settlement agreement offered by the Palau MOJ, in place of charges, which required them to forfeit the vessel's fishing tackle and five small boats and pay \$200,000 USD.²¹</p>	<ul style="list-style-type: none"> • PRC media reports published in English, an official language of Palau, portray the PRC as a responsible fishing nation that is opposed to illegal, unreported, and unregulated (IUU) fishing within its distant fishing fleet.²² • In response to the <i>Qiong Sanya Yu</i> case, PRC officials publicly urged PRC nationals to follow local laws while overseas.²³ At least two English-language PRC media outlets and the PRC embassy in the nearby Solomon Islands echoed these remarks.²⁴ • Just 10 days after acknowledging Palau's detention of a PRC ship for illegal fishing, a PRC MFA spokesperson sought to deflect US criticism of PRC IUU fishing by accusing the US of illegal fishing activities.²⁵

Laws, rules, and norms at risk

Based on these reports, the following laws and conventions may be at risk of subversion by PRC-based actors:

International Conventions	<ul style="list-style-type: none"> • UN Convention on the Law of the Sea (UNCLOS) Part V, Articles 62 and 73²⁶ • 1992 Convention on Biological Diversity, Article 5²⁷
Palau Laws	<ul style="list-style-type: none"> • Palau National Code Regarding Foreign Fishing, Division 1 of Title 27²⁸ • Palau National Marine Sanctuary Act²⁹
PRC Laws, Policy³⁰	<ul style="list-style-type: none"> • Distant Water Fishery Supervisory Regulation, Revised 2017³¹ • PRC Fisheries Law, Revised 2013³²

3. Forced Indonesian labor on board PRC-flagged vessels



Image source: South China Sea Morning Post.

This image is a still from May 2020 video footage appearing to show the burial at sea of an Indonesian crewmember of the PRC-flagged fishing vessel Long Xing 629. Four Indonesian crew died aboard the vessel, as have dozens of crewmembers working aboard other PRC-flagged vessels in recent years, reportedly under unsafe or forced labor conditions.

Alleged PRC activity	What the PRC says about the activity
<p>According to reports by non-governmental organization (NGOs) based in Indonesia, Germany, and the US, between late 2019 and mid-2021, PRC-flagged fishing vessels exploited dozens of Indonesian crewmembers, many of whom have died from illness, beatings, unsafe working conditions, and/or lack of food and water.³³ In April 2020, Indonesian officials began to address the issue publicly, when they acknowledged the deaths of four Indonesian crewmembers on the PRC-flagged <i>Long Xin 629</i>.³⁴ Since then, Indonesian authorities have announced additional cases of human trafficking, abuse, and death of Indonesians aboard PRC-flagged vessels. Subsequently, in May 2021, US Customs and Border Protection (CBP) issued an entry ban for all goods produced by the fleet of China’s Dalian Ocean Fishing Co., Ltd. “based on information that reasonably indicates the use of forced labor in the entity’s fishing operations.”³⁵ Dalian is the owner of at least two ships implicated in the forced labor of Indonesian crewmembers.³⁶</p>	<ul style="list-style-type: none"> • PRC officials and media portray China as a “responsible fishing nation” that would not commit such crimes.³⁷ • Initially, PRC officials acknowledged Indonesia’s concerns about the reported abuses by PRC-flagged vessels and offered to cooperate on investigations.³⁸ • However, by 2021, PRC officials had changed their tune and dismissed reports of abuses as politically motivated false accusations.³⁹ • Following the US CBP’s blacklisting of Dalian Ocean Fishing Co., Ltd, PRC media began to dismiss accusations of abuses by PRC-flagged vessels as US lies designed to “create contradiction” between Indonesia and China.⁴⁰

Laws, rules, and norms at risk	
Based on these reports, the following laws and conventions may be at risk of subversion by PRC-based actors:	
<p>International Conventions</p>	<ul style="list-style-type: none"> • International Labour Organization (ILO) Work in Fishing Convention No. 188 (2007)⁴¹ • ILO Forced Labour Convention, 1930 (No. 29)⁴² • ILO Abolition of Forced Labour Convention, 1957 (No. 105)⁴³
<p>Regional Fishery Provisions</p>	<ul style="list-style-type: none"> • A non-binding resolution on labor standards for crewmembers in the Convention Area is in effect, and a draft binding resolution is under review⁴⁴
<p>Indonesian Laws</p>	<ul style="list-style-type: none"> • Manpower Law (2003)⁴⁵
<p>PRC Laws, Policy⁴⁶</p>	<ul style="list-style-type: none"> • Ministry of Agriculture Notice on Continued Pilot Program Introducing Foreign Crews to the Ocean Fishing Industry, Section 1 (2017)⁴⁷

4. PRC vessels detained for illegal fishing in Vanuatu EEZ



Image source: *Daily Post Vanuatu*.

Vanuatu authorities detained PRC-flagged fishing vessels Dong Gang Xing 13 and 16 on January 19, 2021, for suspected illegal fishing within Vanuatu’s territorial waters. The vessels had permission to fish within Vanuatu’s EEZ but not within its 12-mile territorial waters, where they were caught with their Automatic Identification Systems (AIS) turned off.

Alleged PRC activity	What the PRC says about the activity
<p>On January 19, 2021, a Vanuatu Maritime Police vessel intercepted two PRC-flagged fishing vessels, <i>Dong Gang Xing 13</i> and <i>Dong Gang Xing 16</i>, for suspected IUU fishing activities within Vanuatu’s territorial waters.⁴⁸ Vanuatu prosecutors alleged that the ship operators engaged in illegal fishing without a license, turned off their satellite transponders while in Vanuatu’s waters, and possessed a driftnet in violation of Vanuatu’s Fisheries Act.⁴⁹ The ships’ owner, Zhuhai Dong Gang Xing Ocean Fishing Co., refuted these charges at the time of the arrest of the ships and crew.⁵⁰ On May 18, 2021, the 14 detained PRC nationals pleaded not guilty on all charges in Vanuatu’s Supreme Court.⁵¹ As of August 18, 2021, the ruling in the case has not been publicly reported, and Vanuatu authorities have not responded to requests for information.</p>	<ul style="list-style-type: none"> • PRC media reports published in English and French—official languages of Vanuatu—portray the PRC as an enforcer of international laws and norms related to the protection of fisheries.⁵² • In a likely effort to downplay the incident, neither the PRC embassy in Vanuatu nor the PRC MFA responded to requests for comment about the case.⁵³ Similarly, PRC media directed at foreign audiences did not report on the case.⁵⁴ • The few Chinese-language PRC media reports observed asserted that this was the first time that Vanuatu had detained a PRC fishing boat.⁵⁵ • A May 2021 PRC embassy publication portrays China as a source of aid that has contributed to Vanuatu’s development, including the development of its fishing industry.⁵⁶

Laws, rules, and norms at risk	
Based on these reports, the following laws and conventions may be at risk of subversion by PRC-based actors:	
International Conventions	<ul style="list-style-type: none"> • UNCLOS, Part V Articles 62 and 73⁵⁷ • United Nations General Assembly Resolution 52/29 Banning All Large-Scale Driftnet Fishing, June 1998
Regional Fishery Provisions	<ul style="list-style-type: none"> • The Western and Central Pacific Fisheries Commission (WCPFC), Part V⁵⁸
Vanuatu Laws	<ul style="list-style-type: none"> • Vanuatu Fisheries Act No. 10 (2014), Part 14⁵⁹ • Vanuatu Maritime Zones Act 2010, Part 4⁶⁰
PRC Laws, Policy⁶¹	<ul style="list-style-type: none"> • Distant Water Fishery Supervisory Regulation, Revised 2017⁶² • PRC Fisheries Law, Revised 2013⁶³

5. PRC vessels engaging in illegal fishing in Gabon



Image source: Sea Shepherd.

Gabonese authorities arrested PRC-flagged vessels Guo Ji 826 and Guo Ji 866 in August 2020 after discovering more than 6 tons of illegally caught fish, including 1 ton of endangered daisy stingrays and ray fins and 5 tons of poached rough-head sea catfish. One year earlier, Gabonese authorities arrested another vessel owned by the same PRC company for IUU fishing, making the 2020 case an apparent repeat offense.

Alleged PRC activity	What the PRC says about the activity
<p>On August 8, 2020, Gabonese authorities, in collaboration with Netherlands-based non-profit Sea Shepherd, stopped two PRC-flagged trawlers, <i>Guo Ji</i> 826 and <i>Guo Ji</i> 866, for a routine inspection.⁶⁴ According to Sea Shepherd and local media reports, the inspection found illegally harvested rough-head sea catfish, endangered daisy stingrays, and other finned rays.⁶⁵ Gabonese authorities aboard the Sea Shepherd vessel arrested and escorted both vessels to port where further investigation uncovered additional rays and ray fins.⁶⁶ The ship's captain, a PRC national, told authorities that he was unaware that the catch was illegal.⁶⁷ According to local media, a year earlier, Gabonese authorities arrested two other PRC-flagged vessels—<i>Guo Ji</i> 827 (operated by the same owner as <i>Guo Ji</i> 826 and 866) and <i>Haixin</i> 27—for IUU fishing in protected Gabonese waters.⁶⁸</p>	<ul style="list-style-type: none"> • PRC media reports published in French, the official language of Gabon, assert that China has “zero tolerance” for illegal fishing among its distant water fishing (DWF) fleet.⁶⁹ • PRC French-language media reports also portray China’s presence in the local fishing industry in Gabon as a “win-win” development.⁷⁰ • Similarly, French-language PRC media reports describe China’s DWF activities in Africa as “playing an important role in promoting the welfare of African peoples.”⁷¹ • However, neither PRC officials nor media publicly discussed Gabon’s 2019 or 2020 arrest of the PRC-flagged vessels for IUU fishing. Instead, the PRC embassy in Gabon continued to promote the narrative that PRC investment and cooperation in Gabon is beneficial.⁷²

Laws, rules, and norms at risk

Based on these reports, the following laws and conventions may be at risk of subversion by PRC-based actors:

International Conventions	<ul style="list-style-type: none"> • UNCLOS, Part V Articles 62 and 73⁷³ • 1992 Convention on Biological Diversity, Article 5⁷⁴
Regional Fishery Provisions	<ul style="list-style-type: none"> • Regional Fisheries Commission for the Gulf of Guinea (COREP), Article 3⁷⁵
Gabon Laws	<ul style="list-style-type: none"> • Gabon Fisheries and Aquaculture Law (2005), Title 4, Ch. 3, Part 1⁷⁶
PRC Laws, Policy⁷⁷	<ul style="list-style-type: none"> • Distant Water Fishery Supervisory Regulation, Revised 2017⁷⁸ • PRC Fisheries Law, Revised 2013⁷⁹

6. Pollution from PRC-owned fishmeal factories in Gambia



Image source: China Dialog Ocean.

Waste from the PRC-owned Golden Lead fishmeal factory is reported to have turned the water of the Bolong Fenyo lagoon red and killed multiple species of animals and plants. Sampling found the water contained double the amount of arsenic and 40 times the amount of phosphates and nitrates deemed safe.

Alleged PRC activity	What the PRC says about the activity
<p>Gambian media outlets report that three PRC-owned fishmeal factories have discharged untreated wastewater and dangerous chemicals into a maritime reserve and the country’s coastal waters.⁸⁰ Local media reports say that pollution from these factories has damaged freshwater and coastal marine resources, killed marine life, and caused locals to suffer skin ailments.⁸¹ Testing initiated by local groups reportedly showed unsafe levels of arsenate, phosphates, and arsenic.⁸² A 2017 lawsuit brought by the Gambian National Environmental Agency (NEA) resulted in one PRC-owned factory being fined and all three being forced to suspend operations.⁸³ The plants have since reopened and reportedly continue to pollute local waters.⁸⁴ In March 2021, the NEA issued a “stop notice” to one factory for violating the nation’s environmental laws.⁸⁵ Despite the order, the factory continued plant expansion work, according to Gambian media.⁸⁶ During the same period, local protestors burned a second PRC-owned fishmeal factory in response to a constellation of alleged environmental and criminal complaints.⁸⁷</p>	<ul style="list-style-type: none"> • PRC officials issued statements seeking to deny the role of the PRC-owned companies in local environmental degradation and to portray the fishmeal factories as good for local economic and social development.⁸⁸ • The PRC ambassador told local media that the embassy investigations had found no harmful substances in the factory effluent, and that China requires PRC entities to “follow local laws and fulfill their social responsibilities.”⁸⁹ • Similarly, an embassy spokesperson said that the allegations against the factories “lack evidence.”⁹⁰ • The PRC ambassador claimed the wastewater in question “provides abundant nutrition,” and that “farmers in China buy this kind of wastewater to add to their fishponds.”⁹¹ • PRC media did not address reports of pollution, but one report highlighted China’s “offers to help Gambia” in its fish-processing industry.⁹²

Laws, rules, and norms at risk

Based on these reports, the following laws and conventions may be at risk of subversion by PRC-based actors:

International Conventions	<ul style="list-style-type: none"> • The London Dumping Convention of 1972, Annex 1⁹³ • UNCLOS Article 194, prevention of marine pollution from land-based sources⁹⁴
Gambia Laws	<ul style="list-style-type: none"> • Environmental Impact Assessment Regulation (2014)⁹⁵ • Gambia Fisheries Act⁹⁶
PRC Laws, Policy ⁹⁷	<ul style="list-style-type: none"> • Fisheries Law Article 36⁹⁸ • Marine Environmental Protection Law⁹⁹

7. Illegal ownership of Ghana’s fishing trawler fleet



Image source: Environmental Justice Foundation.

According to US-based NGOs, PRC companies are the “beneficial owners” of most Ghanaian-flagged fishing vessels. This illegal ownership structure reportedly siphons resources away from Ghana and leads to destructive overfishing.

Alleged PRC activity	What the PRC says about the activity
<p>Two investigative reports published by US-based environmental NGOs in 2019 and 2021 found that PRC corporations are the beneficial owners of nearly all trawlers in Ghana.¹⁰⁰ It is reportedly illegal in Ghana for foreign companies to hold beneficial ownership of Ghanaian-flagged trawlers.¹⁰¹ According to the US-based NGOs, PRC corporations register the trawlers with China’s Ministry of Agriculture, while also registering the vessels with the Ghanaian flag via locally incorporated shell companies. This allows them to benefit from PRC fuel subsidies and tax benefits and obtain low-cost local fishing licenses from Ghanaian authorities allowing them to fish in Ghana’s EEZ.¹⁰² According to one US-based NGO, this illegal practice results in Ghana losing up to \$23 million USD annually in fishing license fees.¹⁰³ In addition, the practice also leads to IUU fishing and a decreasing catch per fishing effort, negatively affecting local fisherfolk.¹⁰⁴</p>	<ul style="list-style-type: none"> • PRC officials and media have not publicly addressed the 2019 and 2021 reports that PRC companies illegally own Ghanaian trawlers. • Of note, a PRC embassy representative in Ghana reportedly acknowledged the PRC-owned trawler fleet during a 2012 media interview.¹⁰⁵ • PRC officials and media portray China’s investment in Ghana’s fishing industry as beneficial to the local population. • For example, multiple English-language reports by China’s state-run news agency Xinhua state that the “goal” of China’s investment in Ghana’s fishing industry is to support local and artisanal fishing.¹⁰⁶ • Similarly, PRC embassy press releases portray China’s fishery investments as “greatly improving living standards” for coastal Ghanaians.¹⁰⁷

Laws, rules, and norms at risk

Based on these reports, the following laws and conventions may be at risk of subversion by PRC-based actors:

International Conventions	<ul style="list-style-type: none"> • UNCLOS Part V, Articles 62.4 and 72 and Article 91¹⁰⁸
Ghanaian Laws	<ul style="list-style-type: none"> • Fisheries Act 625: Section 41(7) & 63(1)¹⁰⁹ • Fisheries Management Plan fleet reduction ¹¹⁰
PRC Laws, Policy¹¹¹	<ul style="list-style-type: none"> • 2020 White Paper on Compliance of China’s DWF¹¹²

8. Illegal entering and anchoring in Malaysia’s territorial waters



Image source: Malaysian Maritime Enforcement Agency.

Malaysia’s Maritime Enforcement Agency (MMEA) detained six PRC-flagged fishing vessels in October 2020 for entering and anchoring in its territorial waters without permission. The PRC vessels, approximately 2 miles from the Malaysian coast, had failed to request both access to Malaysia’s territorial fisheries and permission to anchor.

Alleged PRC activity	What the PRC says about the activity
<p>On October 9, 2020, Malaysian and international news media reported that the MMEA had detained six PRC-flagged fishing vessels and their crews for entering and anchoring in Malaysia’s territorial waters without the legally required permissions.¹¹³ The vessels’ crewmembers reportedly told authorities they were en route from China to Mauritania and stopped to anchor because of unspecified “malfunctions.”¹¹⁴ At the time of the detention, Malaysian and international media reports noted that Malaysian authorities were investigating the case under sections of Malaysian law that carry fines and jail time upon conviction.¹¹⁵ However, Malaysian authorities released the crew two weeks after they were detained without making any public statement regarding their release or the status of the investigation.¹¹⁶</p>	<ul style="list-style-type: none"> • The PRC MFA acknowledged that the vessels were detained in “Malaysia’s waters.” Both the MFA and the PRC embassy called on Malaysian authorities to carry out a “fair investigation, ensuring the rights and interests of the Chinese citizens involved.”¹¹⁷ • During the detention, the PRC foreign minister and his Malaysian counterpart issued a joint statement “underscoring the importance of maintaining peace, security and stability”; the statement did not directly address this case.¹¹⁸ • Malay, English, and Chinese-language PRC media reports reiterated remarks by the PRC embassy and the MFA without providing additional detail or commentary.¹¹⁹ • English-language PRC media characterized the detained PRC crews and vessels as being held for “alleged illegal fishing,” and described Malaysia as “claiming the vessels were trespassing.”¹²⁰

Laws, rules, and norms at risk

Based on these reports, the following laws and conventions may be at risk of subversion by PRC-based actors:

International Conventions

- UNCLOS, Part II, Articles 18 and 19¹²¹

Malaysian Laws

- Merchant Shipping Ordinance (OPS) 1952 – Section 449¹²²
- Fisheries Act 1985 – Part V: Foreign Fishing Vessels¹²³

PRC Laws, Policy¹²⁴

- 2020 White Paper on Compliance of China’s DWF¹²⁵

9. PRC harvesting giant clams in Philippine-administered waters



Image: National Task Force for the West Philippine Sea.

In March 2021, the Philippine Navy and media alleged that PRC fishermen illegally harvested giant clams in the vicinity of Philippines-administered Pag-asa Island (Thitu Island) in the Spratly Islands. Philippine and PRC laws prohibit giant clam harvesting because the species is vulnerable to extinction and harvesting methods destroy reefs that are critical to fish stocks.

Alleged PRC activity	What the PRC says about the activity
<p>Multiple international conventions categorize the giant clam as a vulnerable species. Both the Philippines and the PRC have banned their harvest.¹²⁶ The Philippine Navy and media assert that PRC fishermen operating near the contested Pag-asa Island (Philippines-administered) and Scarborough Shoal (PRC-administered) in the South China Sea continue to harvest giant clams illegally using environmentally damaging methods.¹²⁷ Philippine media also assert that the PRC Coast Guard is aware of the illegal harvesting around Scarborough Shoal.¹²⁸ Philippine journalists have observed the PRC using “chopper boats,” explosives, chemicals, water pumps, and vacuums on the coral reefs to harvest the giant clams, whose shells are sold for high prices in China.¹²⁹ These harvesting methods have reportedly destroyed more than 104 square kilometers of coral reefs in the South China Sea, further depleting fish stocks and harming the livelihoods of fisherfolk from the Philippines and other countries.¹³⁰</p>	<ul style="list-style-type: none"> • PRC officials and media promote the narrative that the PRC “cares more than any other country” does about protecting the South China Sea, and that reports of illegal PRC fishing activities are false and/or politically motivated. This narrative has been observed in PRC media reporting in Filipino, English, and Chinese.¹³¹ • PRC officials and media do not appear to have addressed publicly the 2019–2021 allegations that PRC vessels illegally harvested giant clams.¹³² • Of note, English-language PRC media reports have discussed the damage caused by the practice.¹³³ • Recent PRC media reports in Filipino appear not to address the issue at all. Instead, PRC media reporting targeted at Philippine audiences reiterates PRC South China Sea sovereignty claims, portrays China as a responsible actor, calls on the Philippines to cooperate further with China, and dismisses concerns about PRC vessels swarming Filipino fisherfolk.¹³⁴

Laws, rules, and norms at risk

Based on these reports, the following laws and conventions may be at risk of subversion by PRC-based actors:

International Conventions	<ul style="list-style-type: none"> • Convention on International Trade in Endangered Species (CITES)¹³⁵ • UNCLOS, Articles 58, 62, 117–119¹³⁶ • 1992 Convention on Biological Diversity, Article 5¹³⁷
Philippine Laws	<ul style="list-style-type: none"> • Philippine fisheries code¹³⁸ • Philippines’ Wildlife Protection Act¹³⁹
PRC Laws, Policy¹⁴⁰	<ul style="list-style-type: none"> • Regulations on protection of coral reefs and clams in Hainan Province, Article 10¹⁴¹

10. PRC research vessel operating “dark” in Indonesian waters



Image: Indonesia's Maritime Security Agency (Baklama).

Indonesian authorities asserted that the PRC research vessel Xiang Yang Hong 03 (left) had been “running dark” in Indonesian waters without broadcasting its position, as required by national and international law. The PRC vessel was escorted out of Indonesian waters by local authorities.

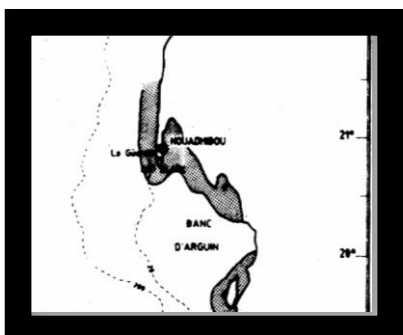
Alleged PRC activity	What the PRC says about the activity
<p>On January 11, 2021, Indonesian news media reported that the Indonesian Maritime Security Agency had intercepted the PRC research vessel <i>Xiang Yang Hong 03</i> in the Sunda Strait for operating in Indonesian waters with its AIS de-activated.¹⁴² According to Indonesian and international regulations, all ships transiting Indonesia’s archipelagic sea lanes are required to have functioning AIS.¹⁴³ Indonesian authorities reportedly suspected the vessel was conducting unauthorized activities in the Sunda Strait while its AIS was off.¹⁴⁴ Media reports speculated that the PRC vessel was gathering oceanographic information to inform PRC Navy submarine operations.¹⁴⁵ Indonesian law requires foreign vessels to obtain permission to conduct oceanographic research in Indonesia’s EEZ or territorial waters; Indonesia’s foreign ministry indicated that no such permissions had been given to the PRC vessel.¹⁴⁶</p>	<ul style="list-style-type: none"> • The PRC embassy in Indonesia declined to comment publicly on Indonesian authorities’ January 11 interception of the PRC vessel.¹⁴⁷ • PRC officials and media portray PRC vessels as abiding strictly by “the world’s most rigorous Vessel Monitoring System (VMS).” PRC media reporting conveyed this narrative in English and Indonesian.¹⁴⁸ • In a possible effort to deflect scrutiny from PRC vessels’ activities, Indonesian-language PRC media reports portrayed US survey ships as “spying” in the South China Sea.¹⁴⁹ • English and Indonesian-language PRC media reporting also sought to portray PRC research vessels in a positive light, highlighting their efforts to assist the Indonesian navy in the retrieval of its sunken submarine KRI <i>Nanggala</i> 402.¹⁵⁰

Laws, rules, and norms at risk

Based on these reports, the following laws and conventions may be at risk of subversion by PRC-based actors:

International Conventions	<ul style="list-style-type: none"> • Safety of Life at Sea (SOLAS) Regulation V/19 paragraph 22¹⁵¹ • UNCLOS, Part V¹⁵²
Indonesian Laws	<ul style="list-style-type: none"> • Government Regulation No. 37 of 28 June 2002, Article 7¹⁵³ • Act No. 6 of 1996 regarding Indonesian Waters, Transit Crossing Rights¹⁵⁴
PRC Laws, Policy¹⁵⁵	<ul style="list-style-type: none"> • China is a ratified signatory of the International Maritime Organization (IMO) Convention for SOLAS, which requires active AIS on non-military vessels of 300 gross tonnage (GT) and above.¹⁵⁶

11. PRC trawler in Mauritania restricted area rams local boat



The shaded area of the map depicts Atlantic waters around northern Mauritania that are restricted to artisanal fishing. In September 2020, Mauritanian media reported that a PRC trawler intentionally rammed a local artisanal fishing vessel in these waters, resulting in the death of three Mauritians. The PRC vessel's AIS allegedly was de-activated at the time.

Image source: UN Food and Agriculture Organization.

Alleged PRC activity	What the PRC says about the activity
<p>According to Mauritanian news media from early September 2020, a PRC-flagged trawler struck a Mauritanian fishing vessel at night, killing three of its crew.¹⁵⁷ Local and regional media reported that the PRC fishing vessel struck the artisanal Mauritanian boat in waters off Nouadhibou, in an area restricted to artisanal fishing where industrial trawlers are prohibited. The head of the local artisanal fishing association alleged that the incident was not an accident, and asserted that the PRC vessel had turned off its lights, de-activated its AIS, and intentionally rammed the local fishing vessel.¹⁵⁸ Mauritanian authorities reportedly arrested the captain of the PRC vessel, and local community members carried out protests against PRC and other foreign trawlers for their alleged illegal and dangerous fishing practices.¹⁵⁹ A similar case had taken place in 2017, when another PRC vessel reportedly collided with multiple local fishing vessels, killing at least four people, according to Mauritanian media.¹⁶⁰</p>	<ul style="list-style-type: none"> • PRC officials and media have not publicly addressed the alleged ramming incident in restricted Mauritanian waters. • PRC official remarks published in Arabic, French, and Chinese promote the narrative that China contributes to Mauritania's "stability and development"¹⁶¹ and characterize China's presence in local fisheries as "win-win."¹⁶² • PRC officials also highlight PRC investment in local fish processing facilities.¹⁶³ • PRC media reports directed at local audiences similarly seek to portray Beijing as a benefactor, highlighting medical assistance to Mauritania¹⁶⁴ and PRC investment in local fisheries.¹⁶⁵ • There is evidence that the PRC wants Mauritania to change its fishery area restrictions. For example, the PRC embassy issued a press release describing bilateral discussions about the "adjusting of fishing areas," indicating Beijing's interest in greater access to waters currently reserved for local artisanal fisherfolk.¹⁶⁶

Laws, rules, and norms at risk

Based on these reports, the following laws and conventions may be at risk of subversion by PRC-based actors:

International Conventions	<ul style="list-style-type: none"> • International Convention for Safety of Life at Sea (IMO SOLAS 1974)¹⁶⁷
Regional Fishery Provisions	<ul style="list-style-type: none"> • Sub-Regional Fisheries Commission (SRFC) convention¹⁶⁸ • SRFC Dakar 2014 declaration on illegal, unregulated, and unreported fishing¹⁶⁹
Mauritania Laws	<ul style="list-style-type: none"> • Description and evaluation of fishery resources in the Mauritanian EEZ¹⁷⁰

12. Namibia investigates PRC vessels for illegal entry and fishing



Image source: NAMPA.

In response to allegations of illegal fishing and anchoring without permission in Namibian territorial waters, six PRC-owned fishing vessels and their crews were detained and investigated by Namibian authorities. While noting inconsistencies in fishing logbooks and contradictory explanations for the ships' anchorage, Namibian authorities found no evidence of illegal fishing and released the vessels, which then sailed into South African waters without permission where they were again detained and fined.

Alleged PRC activity	What the PRC says about the activity
<p>In March 2020, local media reported that the Namibian Navy had intercepted six PRC-owned fishing vessels in a popular fishing location 17 miles off the Namibian coast.¹⁷¹ According to local media, Namibian authorities stated that the PRC vessels entered Namibia illegally and had not received authorization to anchor.¹⁷² Ultimately, the investigation found no evidence of illegal fishing, but did identify discrepancies and evidence of behaviors that could be used to conceal illicit activities. First, the PRC fishing vessels had catch records for Angola ending in March 2019, but no logbooks or licenses for their subsequent 11 months in waters off Equatorial Guinea and Namibia.¹⁷³ Second, the Namibian Navy noted that the vessels had de-activated their AIS.¹⁷⁴ Third, the PRC crew claimed that they anchored to avoid inclement weather, but the Namibian Navy could not corroborate the alleged bad weather.¹⁷⁵ Of note, after the PRC vessels were released, they sailed into South African waters without permission where they were detained and fined.¹⁷⁶</p>	<ul style="list-style-type: none"> • In a Facebook post, the PRC embassy in Namibia offered an alternative narrative of events.¹⁷⁷ It asserted that the six PRC vessels were conducting “innocent navigation” and were not engaging in any “wrongful acts.”¹⁷⁸ • The PRC embassy also characterized the Namibian Navy’s interdiction of the PRC vessels as “humanitarian assistance” in response to dangerous weather.¹⁷⁹ • Press releases from the PRC embassy in Namibia portray China’s investment in the Namibian fishery sector as “mutually beneficial,” crediting China for furnishing Namibia’s “ocean-going fishing vessels” and investing in fishery infrastructure.¹⁸⁰ • Xi Jinping himself has characterized PRC investment in Namibia positively and called for the “enhanced well-being of both parties.”¹⁸¹

Laws, rules, and norms at risk

Based on these reports, the following laws and conventions may be at risk of subversion by PRC-based actors:

Regional Fishery Provisions	<ul style="list-style-type: none"> • South East Atlantic Fisheries Organization convention on fishing logbooks¹⁸²
Namibian Laws	<ul style="list-style-type: none"> • Marine Resources Act 27 of 2000¹⁸³ • Maritime Traffic Act¹⁸⁴
Eqatrl. Guinea Law	<ul style="list-style-type: none"> • Catch declaration requirement between Equatorial Guinea and EEC¹⁸⁵
PRC Laws, Policy¹⁸⁶	<ul style="list-style-type: none"> • 2020 White Paper on Compliance of China’s Distant-water Fishing¹⁸⁷

13. PRC nationals smuggled into Cambodia by sea



Image source: Cambodia National Police.

Cambodian authorities arrested 36 PRC nationals for attempting to enter the country illegally aboard the vessel Tong Hai. Press reports and PRC embassy statements suggest that the PRC nationals may have been “lured” into the 2000-mile journey from Fujian to work in illegal online gambling parlors based in Sihanoukville, Cambodia.

Alleged PRC activity	What the PRC says about the activity
<p>According to a Cambodia police report and local media, Cambodian maritime authorities arrested 36 PRC nationals and two Cambodians on July 26, 2020, for illegal entry into the country aboard a Cambodian-flagged vessel named <i>Tong Hai</i>.¹⁸⁸ Cambodian authorities said that <i>Tong Hai</i> left the port of Fu’an in the PRC’s Fujian province on July 18 and sailed roughly 2,000 nautical miles to waters outside of Sihanoukville, where Cambodian authorities boarded the ship.¹⁸⁹ Cambodian authorities and media have not provided details on the vessel’s owner or operator, but photographs of the ship’s interior posted by local media show hardware with Chinese characters, possibly indicating that a PRC entity operates the ship.¹⁹⁰ Local media reports say that Cambodian police found no suspicious cargo beyond the smuggled persons, and it is unknown why the PRC nationals were attempting to enter Cambodia illegally.¹⁹¹ Cambodian police noted in a press release that they were prepared to deport the PRC nationals one day after their arrest, but released no further details about the case.¹⁹²</p>	<ul style="list-style-type: none"> • PRC official remarks and media reporting targeted at audiences in Cambodia emphasize China’s efforts to combat human trafficking and illegal immigration in the region.¹⁹³ • The PRC embassy in Cambodia issued a press release on September 8, 2021, in response to local media reporting about human smuggling and illegal gambling in Sihanoukville’s “China Town.” This press release emphasized that “most of the victims” are PRC citizens and urged cooperation with local law enforcement.¹⁹⁴ • One Chinese language media report on the case asserted that those on board were likely “deceived and smuggled” into Cambodia to work for illegal online gaming parlors that target gamblers in China.¹⁹⁵ • PRC officials’ remarks and media reporting targeted at audiences in Cambodia have also sought to deflect criticism by portraying the US as at hotspot for human trafficking and forced labor.¹⁹⁶

Laws, rules, and norms at risk	
Based on these reports, the following laws and conventions may be at risk of subversion by PRC-based actors:	
International Conventions	<ul style="list-style-type: none"> • UN Protocol to Prevent, Suppress and Punish Trafficking in Persons¹⁹⁷ • 1990 International Convention on the Protection of the Rights of All Migrant Workers and Their Families¹⁹⁸
Cambodian Laws	<ul style="list-style-type: none"> • Law on Suppression of Human Trafficking and Sexual Exploitation, Article 18¹⁹⁹
PRC Laws, Policy²⁰⁰	<ul style="list-style-type: none"> • Criminal Law of the People’s Republic of China, Articles 240, 303²⁰¹

14. Tampering with Automatic Identification Systems

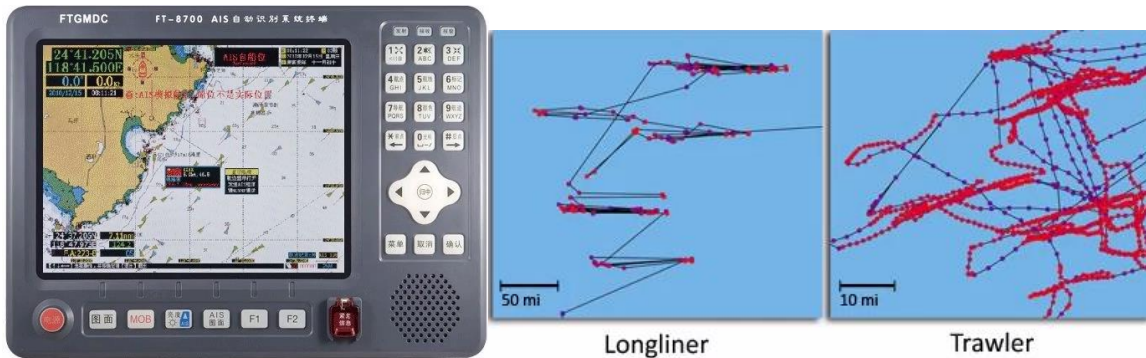


Image source: *The Paper* (left, AIS equipment), Global Fishing Watch (right, fishing vessel AIS tracks).

Distant water fishing (DWF) and other types of vessels from the PRC reportedly deactivate their AIS (pictured above left), providing cover for possible illicit maritime activity, such as IUU fishing or illegal transshipment, and increasing the risk of accidents. Deactivating AIS also violates international conventions and national laws that require functioning AIS aboard nearly all large maritime vessels.

Background

Vessels “go dark” by obscuring their location, movement, and transmissions, or by manipulating the data transmitted by their signals. One way that vessels “go dark” is by disabling or tampering with their AIS, an automatic open-source tracking system that assists a vessel’s safe navigation and allows authorities to track and monitor vessel movements.²⁰² International conventions and PRC laws require ships with 300+ gross tonnage (GT) to carry functioning AIS while sailing internationally.²⁰³ According to experts, vessels sometimes turn off or tamper with their AIS to mask illicit activity.²⁰⁴ DWF and other types of PRC vessels reportedly tamper with onboard AIS while operating around the world.²⁰⁵ Between 2018 and 2021, there were reports of PRC vessels allegedly shutting off or tampering with their AIS to obscure illicit activities in the waters of the Democratic Republic of Korea (DPRK),²⁰⁶ Ecuador,²⁰⁷ Vanuatu,²⁰⁸ West Africa,²⁰⁹ the Philippines,²¹⁰ and Indonesia.²¹¹

Alleged PRC activity

DPRK: According to a study conducted by eight institutions using satellite technology not reliant on AIS signals, nearly 1,000 “dark” vessels of PRC origin fished illegally in North Korean waters in 2017 and 2018, with the activity continuing into at least 2019.²¹² Similarly, maritime trade organization Windward has reported that one way that PRC vessels evade United Nation (UN) sanctions on the DPRK is by de-activating their AIS to import UNSC-prohibited commodities, including DPRK-origin coal.²¹³ This behavior violates domestic regulations and UN sanctions that prohibit countries from purchasing fishing rights from North Korea or importing and exporting a wide array of commodities, including North Korean coal.²¹⁴

Ecuador: From 2018 to 2021, investigative reports by international media and NGOs documented PRC squid jiggers and trawlers “going dark” in the high seas off South America, including near Ecuador’s Galapagos Islands, a UNESCO world heritage site.²¹⁵ Similarly, an analysis of select PRC-flagged vessels’ operations near the Galapagos in 2020 found numerous instances of vessels changing draft, length, and ownership, and “going dark” near Galapagos’ EEZ. According to the analysis, “The obfuscation tactics may be a mix of concern about reputational harm and uncertainty about applicable law.”

Alleged PRC activity

Vanuatu: On January 19, 2021, a Vanuatu Maritime Police vessel intercepted two PRC-flagged fishing vessels, *Dong Gang Xing 13* and *Dong Gang Xing 16*, for suspected IUU fishing activities within Vanuatu's territorial waters.²¹⁶ The vessels had permission to fish within Vanuatu's EEZ but not within its 12-mile territorial waters, where they were caught with their AIS turned off, according to Vanuatu prosecutors.²¹⁷

Gambia: A 2019–2020 analysis of fishing vessels operating in waters off the Gambia and other states belonging to the Economic Community of Western African States found PRC-flagged vessels altering AIS data so that multiple vessels shared names and IMO and Maritime Mobile Service Identity numbers, each of which is required legally to be distinct.²¹⁸

Indonesia: On January 11, 2021, Indonesian media reported that the Indonesian Maritime Security Agency had intercepted the PRC research vessel *Xiang Yang Hong 03* in the Sunda Strait for operating in Indonesian waters with its AIS de-activated.²¹⁹ According to Indonesian and international regulations, all ships transiting Indonesia's archipelagic sea lanes are required to have functioning AIS.²²⁰

Philippines: On the night of June 9, 2019, the 44-meter, steel-hulled PRC vessel *Yuemaobinyu 42212* rammed the 19-meter wood-hulled Philippine vessel *Gem Ver* with AIS de-activated and lights off, according to crew aboard the *Gem Ver* and Philippine media reports.²²¹ The PRC vessel sailed away from the scene, leaving the 22 *Gem Ver* crewmembers stranded at sea until they were rescued by Vietnamese fishermen.²²²

What the PRC says about the activity

- PRC officials and foreign-directed media have pushed back against allegations that PRC vessels shut off their AIS to conceal illicit activity. They contend that PRC vessels rigorously abide by separate, but related, PRC Vessel Monitoring System (VMS) requirements.²²³ Of note, VMS data is used for fisheries control and surveillance programs and is not meant to be released to the public or shared with other nations unless they are fishing within a RFMO or other countries' EEZs. Also of note, some PRC DWF fishing vessels do not meet the 300 GT requirement for AIS carriage.²²⁴
- During at least four MFA press conferences in 2020, spokespersons asserted that "China implements the world's most rigorous Vessel Monitoring System."²²⁵ These remarks were widely republished by PRC foreign-directed media in multiple languages, including Indonesian, French, Spanish, and English.²²⁶
- PRC media reporting aimed at both domestic and foreign audiences discusses China's AIS requirements and highlights China's efforts to crack down on "illegal or incorrect use of AIS equipment," acknowledging that such actions "pose challenges to maritime order."²²⁷

Laws, rules, and norms at risk

Based on these reports, the following laws and conventions may be at risk of subversion by PRC-based actors:

International Conventions

- IMO SOLAS V/19.2.4, in particular, paragraph 22²²⁸

PRC Laws, Policy²²⁹

- Measures for Administration of Monitoring the Position of Ocean Fishing Vessels²³⁰
- Regulations on Maritime Affairs and Administrative Penalties²³¹

15. PRC vessels allegedly ramming foreign fishing vessels



Image source: Thanh Niên (left), Philippines News Agency (right).

The PRC promotes the narrative that its vessels abide strictly by maritime safety laws, conventions, and norms. However, since 2018, PRC vessels have allegedly intentionally rammed fishing vessels from Vietnam, Senegal, Mauritania, the Philippines, and Brazil. At least three people have reportedly died because of these collisions, and others have been injured or marooned at sea. Beijing has attempted to downplay, deflect, or deny the allegations of ramming to prevent them from undermining its official narrative.

Background

Ramming incidents among fishing vessels are typically the result of competition over contested fishing grounds or other natural resources, often in waters that are the subject of maritime territorial disputes. Ramming incidents have intimidated rival fisherfolk, damaged equipment, sunk vessels, and injured, killed, and marooned crew. On at least five occasions between 2018 and 2021, news media reported that PRC-flagged vessels intentionally rammed fishing vessels from the Philippines, Mauritania, Vietnam, Senegal, and Brazil.²³²

Alleged PRC activity

Philippines: On the night of June 9, 2019, the 44-meter, steel-hulled PRC vessel *Yuemaobinyu 42212* rammed the 19-meter wood-hulled Philippine vessel *Gem Ver*. At the time of the incident, the PRC vessel's AIS and lights were both off.²³³ The PRC vessel sailed away from the scene leaving the 22 crewmembers of the *Gem Ver* stranded at sea until they were rescued by Vietnamese fishermen.²³⁴

Mauritania: On the night of October 9, 2020, a large PRC trawler rammed a Mauritanian artisanal fishing boat. The PRC vessel had its lights off and AIS de-activated.²³⁵ The Mauritanian vessel sank, and three of its crew died.²³⁶

Vietnam: On the night of April 2, 2020, PRC Coast Guard (CG) vessel 4301 rammed Vietnamese fishing vessel *QNg90617*, sinking it and picking up its 8 crewmembers.²³⁷ The PRC CG vessel then chased and stopped nearby Vietnamese vessels and confiscated and erased their crews' cell phones.²³⁸

Senegal: On September 19, 2020, a PRC-operated trawler reportedly tried to capsize a Senegalese-captained 11-person fishing canoe.²³⁹ With the canoe up against the trawler, the Senegalese captain climbed aboard to confront the PRC crew about its dangerous maneuvers and was beaten and burned with gasoline.²⁴⁰

Brazil: On November 22, 2018, the 49-meter PRC tuna vessel *Chang Rong 4* allegedly rammed the 22-meter *Oceano Pesca* six times, resulting in \$90,000 USD damage.²⁴¹

What the PRC says about the activity

- PRC officials and media promote the narrative that PRC vessels strictly abide by maritime safety laws, conventions, and international norms.²⁴²
- In a possible attempt to deflect criticism, PRC foreign-directed media have blamed Vietnamese and Philippine vessels for instigating the incidents that resulted in the collisions.²⁴³
- Vietnamese-language PRC media reporting, alleged that a Vietnamese vessel sank after “harassing and colliding” with a PRC vessel, and claimed that the PRC side saved the Vietnamese crew.²⁴⁴
- In another case, PRC officials and media reporting in multiple languages claimed that a PRC vessel accidentally hit a Philippine vessel after it was “suddenly besieged by Filipino boats,” and denied that it was “an intentional ‘hit and run’.”²⁴⁵ PRC officials further claimed that “the Chinese captain tried to rescue [them] but was afraid of being besieged by other Filipino fishing boats.”²⁴⁶

Laws, rules, and norms at risk

Based on these reports, the following laws and conventions may be at risk of subversion by PRC-based actors:

- | | |
|---|---|
| <i>International Conventions</i> | <ul style="list-style-type: none">• Convention on Suppression of Acts against the Safety of Maritime Navigation²⁴⁷• Convention on the International Regulations for Preventing Collisions at Sea, 1972 (COLREGS)²⁴⁸• International Convention for SOLAS²⁴⁹ |
| <i>PRC Laws, Policy</i> ²⁵⁰ | <ul style="list-style-type: none">• Commercial Fishery Governance 2021²⁵¹• Regulations of Safety Management for Fishing Vessels of Hainan Province²⁵² |

References

- “36 Chinese Nationals Arrested for Illegally Entering Cambodia on a Ship from China.” Kampuchea Thmey. July 24, 2021. https://www.kampucheamthmey.com.translate.goog/local-news/168008/?x_tr_sl=km&x_tr_tl=en&x_tr_hl=en&x_tr_pto=nui.sc.
- “36 Chinese nationals arrested for illegally entering Cambodia via sea.” Khmer Times. July 26, 2021. <https://www.khmertimeskh.com/50901093/36-chinese-nationals-arrested-for-illegally-entering-cambodia-via-sea/>.
- “36 Chinese Nationals Detained in Cambodian Waters.” Cambodia News English. July 25, 2021. <https://cne.wtf/2021/07/25/36-chinese-nationals-detained-in-cambodian-waters/>.
- “36 Chinese Were Arrested for Smuggling into Cambodia! What Is Hidden Behind the ‘Black Industry Chain?’” 36 名中国人偷渡柬埔寨被抓！背后究竟暗藏什么“黑产业链”？. TNAOT. 柬埔寨头条 app. July 26, 2021. <https://www.tnaot.com/zh/m/%3Fpageindex%3D252+%&cd=2&hl=en&ct=clnk&gl=us>.
- “The 50th Chinese Medical Cooperation to Aid Mauritania Speech by the Chinese Ambassador to Mauritania Zhang Jianguo at the reception on the occasion of the opening of the grand photo exhibition and the issuance of the commemorative stamp of the anniversary.” الخمسين للتعاون الطبي الصيني لمساعدة موريتانيا كلمة سعادة السفير الصيني لدى موريتانيا تشانغ جيان قوه في حفل الاستقبال بمناسبة افتتاح معرض الصور الكبير وإصدار الطابع التذكاري للذكرى Embassy of the People’s Republic of China in the Islamic Republic of Mauritania. June 25, 2018. https://www.fmprc-gov-cn.translate.goog/zalt/ara/yjzs/t1571325.htm?x_tr_sl=ar&x_tr_tl=en&x_tr_hl=en&x_tr_pto=nui.sc.
- 1988 Convention for the Suppression of Unlawful Acts Against the Safety of Maritime Navigation.* International Maritime Organization. June 26, 1992. UN. <https://treaties.un.org/doc/db/terrorism/conv8-english.pdf>.
- 1990 International Convention on the Protection of the Rights of All Migrant Workers and Their Families.* United Nations Human Rights. Dec. 18, 1990. <https://www.ohchr.org/en/professionalinterest/pages/cmw.aspx>.
- “The 2017 China-Mauritania Joint Fisheries Committee meeting was held in Beijing.” 2017 年中国—毛里塔尼亚渔业混委会会议在京召开. Embassy of the People’s Republic of China in the Islamic Republic of Mauritania. Oct. 30, 2017. <http://mr.china-embassy.org/chn/sgzyhd/t1507981.htm>.
- Act 317: Fisheries Act 1985.* FAOLEX. Nov. 1, 2012. Accessed Sept. 21, 2021. Food and Agriculture Organization FAOLEX Database. <http://extwprlegs1.fao.org/docs/pdf/mal1869.pdf>.
- Act No. 6 of 8 August 1996 regarding Indonesian Waters, Third Part, Transit Crossing Rights, Article 20.* National legislation - DOALOS/OLA - United Nations - INDONESIA. Aug. 8, 1996. Accessed Sept. 20, 2021. https://www.un.org/depts/los/LEGISLATIONANDTREATIES/PDFFILES/IDN_1996_A ct.pdf.

- Act of the Republic of Indonesia Number 13 Year 2003 Concerning Manpower*. State Gazette of the Republic of Indonesia. 2003. ILO-NATLEX. <https://www.ilo.org/dyn/travail/docs/760/Indonesian+Labour+Law+-+Act+13+of+2003.pdf>.
- ADF Staff. "Mauritanians Protest Chinese Fishing After Deadly Incident." *الموريتانيون يحتجون على سفن الصيد الصينية عقب حادثة دموية*. Africa Defense Forum. Oct. 7, 2020. <https://adf-magazine.com/2020/10/mauritanians-protest-chinese-fishing-after-deadly-incident/>.
- "AIS, the Things You Need to Know." *AIS; 那些您需要了解的事儿*. *The Paper*. 澎湃. Dec. 5, 2019. https://www.thepaper.cn/newsDetail_forward_5153173.
- "Ambassador Chen Gonglai accompanied President Mao to attend the completion ceremony of the Fujian Hongdong Fishery Company project." 驻毛塔大使陈公来陪同毛总统出席福建宏东渔业公司项目竣工仪式. Embassy of the People's Republic of China in the Islamic Republic of Mauritania. Apr. 7, 2014. <http://mr.china-embassy.org/chn/jmwl/t1145897.htm>.
- "Ambassador Hu Changchun to Gabon accepts an exclusive interview with Gabon 24 TV and other media on the theme of the 71st National Day" 驻加蓬大使胡长春以国庆 71 周年为主题接受加蓬 24 电视台等媒体专访. PRC Embassy in Gabon. 中华人民共和国驻加蓬共和国大使馆. Sept. 29, 2020. <http://ga.china-embassy.org/chn/zxxx/t1819676.htm>.
- "Amended Regulations on Administration of Distant Water Fishery Released by Ministry of Agriculture and Rural Affairs of the People's Republic of China." *Global Times*. Mar. 24, 2020. <https://www.globaltimes.cn/content/1183552.shtml>.
- "APIM Director General receives Chinese Ambassador." Mauritania News Agency. Aug. 7, 2021. <https://en.ami.mr/Depeche-1415.html>.
- Article 15, *Regulations on the Prevention and Control of Ship Pollutants in the Marine Environment* [防治船舶污染海洋环境管理条例]. State Council of the People's Republic of China. 2018. http://www.gov.cn/gongbao/content/2014/content_2695225.htm.
- Article 24, Paragraph 1 and Paragraph 2 (12) of the "Regulations of the People's Republic of China on Maritime Affairs and Administrative Penalties" (中华人民共和国海上海事行政处罚规定: 第二十四条第一款及第二款第(十二)). PRC Ministry of Transportation (中华人民共和国交通部). Sept. 1, 2021. Accessed Sept. 30, 2021. <https://www.xindemarineneews.com/m/view.php?aid=32598>
- "ASEAN Regional Forum Defense Officials' Dialogue Meeting Held in Phnom Penh." *កិច្ចប្រជុំសន្តិសុខសមុទ្រអាស៊ានប្រចាំឆ្នាំ*. Cambodian CRI. May 25, 2012. <https://cambodian-cri-cn.translate.goog/141/2012/05/25/1s5481.htm? x tr sch=http& x tr sl=km& x tr t l=en& x tr hl=en-US& x tr pto=nui,op,sc>.
- At What Cost? How Ghana Is Losing Out on Fishing Arrangements with China's Distant Water Fleet*. Environmental Justice Foundation. 2021.
- Boechat, Geraldine. "Alleged Chinese Factory Pollution Kills Dolphin in Gambia." *MedAfrica Times*. May 14, 2018. Accessed Aug. 19, 2021. <https://medafricatimes.com/15852-alleged-chinese-factory-pollution-kills-dolphin-in-gambia.html>.

- “Brazilian Ship Attacked by Chinese in Dispute for Tuna, Union Says.” Navio brasileiro é atacado por chineses em disputa por atum, diz sindicato. UOL. Nov. 27, 2018. <https://noticias-uol-com-br.translate.google.com/cotidiano/ultimas-noticias/2018/11/27/navio-brasileiro-piratas-chineses-pesca-atum-rn.htm? x tr sl=pt& x tr tl=en& x tr hl=en& x tr pto=nui.sc>.
- Brown, Sadie. “Report: Chinese Fishing Companies Cheat Fishing License in Ghana.” Organized Crime and Corruption Reporting Project. Mar. 30, 2021. <https://www.occrp.org/en/daily/14133-report-chinese-fishing-companies-cheat-fishing-license-in-ghana>.
- C029 - *Forced Labour Convention, 1930 (No. 29)*. International Labour Organization. 1930. ILO. https://www.ilo.org/dyn/normlex/en/f?p=1000:12100:0::NO::P12100_ILO_CODE:C029.
- C105 - *Abolition of Forced Labour Convention, 1957 (No. 105)*. International Labour Organization. 1957. ILO. https://www.ilo.org/dyn/normlex/en/f?p=1000:12100:0::NO::P12100_ILO_CODE:C105.
- C188 - *Work in Fishing Convention, 2007 (No. 188)*. International Labour Organization. 2007. ILO. https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C188.
- “CBP Issues Withhold Release Order on Chinese Fishing Fleet.” U.S. Customs and Border Protection. May 28, 2021. <https://www.cbp.gov/newsroom/national-media-release/cbp-issues-withhold-release-order-chinese-fishing-fleet>.
- Chanboth, Chun. “Authorities ready to deport 36 Chinese nationals after illegally entering Cambodia by water.” អាជ្ញាធរត្រៀមបញ្ជូនជនជាតិចិន ៣៦នាក់ត្រលប់ទៅប្រទេសកំណើតវិញ ក្រោយលួចចូលកម្ពុជាខុសច្បាប់តាមផ្លូវទឹក. Radio Free Asia. July 27, 2021. <https://www-rfa-org.translate.google.com/khmer/news/social-economy/authorities-ready-to-deport-36-chinese-back-country-after-smuggling-into-cambodia-07272021162935.html? x tr sl=km& x tr tl=en& x tr hl=en& x tr pto=nui.sc>.
- “China's Embassy in Malaysia Seeks Protection for Legitimate Rights of Detained Chinese Sailors.” CGTN. Oct. 11, 2020. <https://news.cgtn.com/news/2020-10-11/Chinese-embassy-seeks-info-on-fishing-vessels-crew-held-in-Malaysia--UuNRyT70Io/index.html>.
- China's Hidden Fleet in West Africa: A Spotlight on Illegal Practices Within Ghana's Industrial Trawl Sector*. Environmental Justice Foundation. 2018. Accessed Aug. 13, 2021. <https://ejfoundation.org/reports/chinas-hidden-fleet-in-west-africa-a-spotlight-on-illegal-practices-within-ghanas-industrial-trawl-sector>.
- “China's Ministry of Foreign Affairs: Alleged Forced Labor Is a Conspiracy.” Kemenlu Tiongkok: Tuduhan Kerja Paksa Sepenuhnya Adalah Rekayasa. *CRI Indonesian*. June 1, 2021. <http://indonesian.cri.cn/20210601/9a26ce57-d145-8f4a-acc7b2a22fbc8a.html&prev=search&pto=ae>.
- “China's ocean fishing plunders regional resources? Hua Chunying: China urges the US not to sow discord with the world.” (中国远洋捕鱼掠夺地区资源？华春莹：中方敦促美方不要满世界挑拨离间). China News Network (中国新闻网). Dec. 3, 2020. <http://www.chinanews.com/gn/2020/12-03/9353552.shtml>.

- “China-aided port to boost Ghana's fishing industry.” Xinhua. Oct. 28, 2020. http://www.xinhuanet.com/english/2020-10/28/c_139473658.htm.
- “China Accused the Vietnamese Fishing Boat of Ramming the Coast Guard Ship, so It Sank.” Trung Quốc cáo buộc tàu cá Việt Nam đâm tàu hải cảnh nên bị chìm. Radio Free Asia. Apr. 5, 2020. <https://www-rfa-org.translate.goog/vietnamese/news/vietnamnews/china-accuse-vn-of-ramming-coast-guard-04052020080735.html? x tr sl=vi& x tr tl=en& x tr hl=en& x tr pto=nui.sc>.
- “China and the Philippines, agreed to enhance bilateral relations and maintain dialogue on maritime issues.” Tsina at Pilipinas, sumang-ayong pasulungin ang bilateral na relasyon at panatilihin ang diyalogo sa isyung pandagat. CRI Filipino. May 22, 2021. <https://filipino-cri-cn.translate.goog/20210522/a2f7772a-2b38-2dff-a7e3-b5914419f1d8-i.html? x tr sch=http& x tr sl=tl& x tr tl=en& x tr hl=en& x tr pto=nui.sc,elem>.
- “China in America: Stop Baseless Criticism.” Tsina sa Amerika: Itigil ang walang batayang pagbatikos. CRI Filipino. Apr. 21, 2020. <https://filipino-cri-cn.translate.goog/301/2020/04/21/109s167325.htm? x tr sch=http& x tr sl=tl& x tr tl=en& x tr hl=en& x tr pto=nui.sc>.
- “China investigates detention of Chinese boat in Ecuador for illegal fishing [French].” La Chine enquête sur la détention d'un bateau chinois en Equateur pour pêche illégale. *People's Daily French*. Aug. 30, 2017. <http://french.people.com.cn/Chine/n3/2017/0830/c31354-9262009.html>.
- “China investigates detention of Chinese boat in Ecuador for illegal fishing [La Chine enquête sur la détention d'un bateau chinois en Equateur pour pêche illégale].” *People's Daily French Edition*. Aug. 3, 2017. <http://french.peopledaily.com.cn/Chine/n3/2017/0830/c31354-9262009.html>.
- “China Is a Responsible Fishing Country.” Tiongkok Adalah Negara Perikanan Yang Bertanggung Jawab. *CRI Indonesian*. Dec. 26, 2020. <http://indonesian.cri.cn/20201226/f3edcb1f-c4cf-af20-8f82-541a8329c810.html&prev=search&pto=aue>.
- “China leads operations against illegal fishing in the Yangtze River [French].” La Chine mène des opérations contre la pêche illégale dans le fleuve Yangtsé. *Xinhua French*. Aug. 10, 2020. http://french.xinhuanet.com/2020-08/10/c_139279867.htm.
- “China opposes the Philippines' construction and deployment of weapons on Thitu Island.” Tsina, tutol sa pagtatayo at pagdedeploy ng Pilipinas ng mga sandata sa Thitu Island. CRI Filipino. Jan. 19, 2016. <https://filipino-cri-cn.translate.goog/301/2016/01/19/102s141341.htm? x tr sl=tl& x tr tl=en& x tr hl=en& x tr pto=nui.sc,elem& x tr sch=http>.
- “China pledges cooperation with Gambia in several areas.” CGTN. Dec. 22, 2017. https://news.cgtn.com/news/7955544e33637a6333566d54/share_p.html.
- “China ready to help bring long-term peace to Sahel region: envoy.” CGTN Africa. Nov. 17, 2020. <https://africa.cgtn.com/2020/11/17/china-ready-to-help-bring-long-term-peace-to-sahel-region-envoy/>.

- “China Responds 'Positively' to Indonesian Request on Human Trafficking.” *Radio Free Asia*. Aug. 20, 2020. <https://www.rfa.org/english/news/china/responds-08202020190246.html>.
- “China Strengthens Fisheries Cooperation with African Countries Under "Belt and Road".” *Xinhua French*. Sept. 9, 2018. http://french.xinhuanet.com/afrique/2018-09/04/c_137443911.htm.
- “China supports Gabon in its development, according to CEO's SG.” *La Chine accompagne le Gabon dans son développement, selon le SG du PDG*. *Xinhua French*. Jan. 1, 2020. http://french.xinhuanet.com/2020-01/01/c_138671316.htm.
- “China to build industrial fishing port in Nouakchott.” *La Chine va construire un port de pêche industrielle à Nouakchott*. *Xinhua French*. Mar. 1, 2018. http://french.xinhuanet.com/2018-03/01/c_137009092.htm.
- “China Urges Malaysia to Investigate Fishing Vessel Detention Case.” *China Gesa Malaysia Siasat Kes Penahanan Kapal Nelayan*. *Malay CRI*. Oct. 13, 2020. <http://malay.cri.cn/20201013/26a1b17c-e71a-469c-1eab-4ee65c6bc4eb.html>.
- “China urges US to protect global environment and stop stoking problems (spokesman) [French].” *La Chine exhorte les États-Unis à protéger l'environnement mondial et à cesser d'attiser les problèmes (porte-parole)*. *Xinhua French*. Oct. 10, 2020. http://french.xinhuanet.com/2020-10/10/c_139429738.htm.
- “China vows harsher punishment for illegal pelagic fishing.” *Xinhua*. Mar. 30, 2020. http://www.xinhuanet.com/english/2020-03/30/c_138930711.htm.
- “China, a Group of Countries, Addressed the UN Human Rights Council, Focusing on Human Trafficking and US Forced Labor.”
ប្រទេសចិននិងក្រុមប្រទេសមួយក្រុមផ្សេងសុទ្ធរកថាមនុស្សនិងសិទ្ធិក្រុមប្រឹក្សាសិទ្ធិមនុស្សនៃអង្គការសហប្រជាជាតិ
ដោយបានផ្ដោតការយកចិត្តទុកដាក់ដល់បញ្ហាជួញដូរមនុស្សនិងសកម្មភាពបង្ខំតបង្ខំឱ្យធ្វើពលកម្មរបស់អាមេរិក. *Cambodian CRI*. Sept. 18, 2021. <https://cambodian-cri-cn.translate.google.com/20210918/e9cf8efe-916d-27a2-223e-76cdd0c67ca3.html? x tr sch=http& x tr sl=km& x tr tl=en& x tr hl=en-US& x tr pto=nui.op.sc>.
- “China, a responsible fishing country.” *Tsina, responsableng bansang pangisda*. *Filipino CRI*. Dec. 26, 2020. <https://filipino-cri-cn.translate.google.com/20201226/388f504f-c345-1ac3-543f-2afa372f12ed.html? x tr sch=http& x tr sl=tl& x tr tl=en& x tr hl=en& x tr pto=nui.sc.elem>.
- “China, Thailand Sign Memorandum of Understanding on Intergovernmental Cooperation to Prevent and Prevent Human Trafficking.”
ប្រទេសចិននិងថៃចុះហត្ថលេខាលើអនុស្សរណៈនៃការយោគយល់គ្នាស្តីពីកិច្ចសហប្រតិបត្តិការអន្តររដ្ឋាភិបាលដើម្បីបង្ការនិងទប់ស្កាត់ការជួញដូរមនុស្ស. *Cambodian CRI*. Nov. 3, 2018. <https://cambodian-cri-cn.translate.google.com/i/20181103/c3107269-6b7a-44ea-4bcc-13a6c9a2657b.html? x tr sch=http& x tr sl=km& x tr tl=en& x tr hl=en-US& x tr pto=nui.op.sc>.
- “China: Philippine construction of school on Thitu Island, illegal.” *Tsina: Pagtatayo ng Pilipinas ng eskuwelahan sa Thitu Island, iligal*. *CRI Filipino*. June 26, 2012. <https://filipino-cri->

[cn.translate.google.com/301/2012/06/26/2s111441.htm? x tr sch=http& x tr sl=tl& x tr tl=en& x tr hl=en& x tr pto=nui.sc.elem.](https://cn.translate.google.com/translate?sl=tl&tl=en&hl=en&ptq=nui.sc.elem&as_sch=http&as_sl=tl&as_tl=en&as_hl=en&as_ptq=nui.sc.elem)

- “Chinese-Philippine fishing in the South China Sea, remains normal.” Pangingisda ng Tsina't Pilipinas sa South China Sea, nananatiling normal. Filipino CRI. Feb. 13, 2019. [https://filipino-cri-cn.translate.google.com/301/2019/02/13/103s160771.htm? x tr sch=http& x tr sl=tl& x tr tl=en& x tr hl=en& x tr pto=nui.sc.elem.](https://filipino-cri-cn.translate.google.com/301/2019/02/13/103s160771.htm? x tr sch=http& x tr sl=tl& x tr tl=en& x tr hl=en& x tr pto=nui.sc.elem)
- “Chinese Ambassador HU Changchun met with Gabonese Minister of Foreign Affairs Pacôme MOUBELET BOUBEYA.” L'Ambassadeur de Chine HU Changchun s'est entretenu avec le Ministre gabonais des Affaires Etrangères Pacôme MOUBELET BOUBEYA. PRC Embassy in Gabon. Ambassade de la République Populaire de Chine en République Gabonaise Oct. 5, 2020. [http://ga.china-embassy.org/fra/zxxx/t1821944.htm.](http://ga.china-embassy.org/fra/zxxx/t1821944.htm)
- “Chinese Ambassador to Ghana H.E. Shi Ting Wang Attends the Groundbreaking Ceremony of the China-aided Jamestown Fishing Port Complex In Ghana.” Embassy of People's Republic of China in the Republic of Ghana. Jan. 5, 2019. [http://gh.china-embassy.org/eng/zjgx/jmhzt/1627189.htm.](http://gh.china-embassy.org/eng/zjgx/jmhzt/1627189.htm)
- “Chinese Ambassador to Mauritania Chen Gong came to meet with the Minister of Fisheries of Mauritania.” 中国驻毛塔大使陈公来会见毛渔业部长. Embassy of the People's Republic of China in the Islamic Republic of Mauritania. 2012. [http://mr.china-embassy.org/chn/xwdt/t816962.htm.](http://mr.china-embassy.org/chn/xwdt/t816962.htm)
- “Chinese and Philippine Fishing Boats Accidentally Collided: Not Suitable for Politicized Interpretation.” 中菲渔船意外相撞 外交部：不宜政治化解读. The Observer. 观察者. June 17, 2019. [https://www.guancha.cn/politics/2019_06_17_505980.shtml.](https://www.guancha.cn/politics/2019_06_17_505980.shtml)
- “The Chinese Embassy in Vietnam Has Expressed Its Stance on the US's Offensive Speech Against China.” Đại sứ quán Trung Quốc tại Việt Nam tỏ rõ lập trường về ngôn luận công kích Trung Quốc của Mỹ. Consulate General of the People's Republic of China in Da Nang. 中哈人民共和国驻岷港总领事馆. Oct. 31, 2020. [https://www.fmprc.gov.cn/ce/cgdanang/vn/lgdt_3/t1831055.htm.](https://www.fmprc.gov.cn/ce/cgdanang/vn/lgdt_3/t1831055.htm)
- “The Chinese Embassy Is Highly Concerned About the Collision Between a Philippine Fishing Vessel and a Hong Kong Freighter, and Requires the Investigation of the Cause.” 中使馆高度关注菲律宾渔船与香港货轮相撞事故，要求查明原因. The Paper. 澎湃. 2020. [https://www.thepaper.cn/newsDetail_forward_8056053.](https://www.thepaper.cn/newsDetail_forward_8056053)
- “Chinese Fishing Vessels Operate in Accordance with Relevant International Laws.” Los barcos pesqueros chinos operan de acuerdo con las leyes internacionales pertinentes. People's Daily Spanish. Sept. 11, 2020. [http://spanish.peopledaily.com.cn/n3/2020/0911/c31621-9759426.html.](http://spanish.peopledaily.com.cn/n3/2020/0911/c31621-9759426.html)
- “Chinese FM Condemns 'Fabricated, Malicious' Report of US Company Accusing Chinese Ships of Dumping Sewage in South China Sea.” *Global Times*. July 15, 2021. [https://www.globaltimes.cn/page/202107/1228779.shtml.](https://www.globaltimes.cn/page/202107/1228779.shtml)
- “Chinese Foreign Ministry Spokeswoman Jiang Yu's Regular Press Conference on Hong Kong-China.”
ការវិាយល័យស្នងការនៃក្រសួងការបរទេសចិនប្រចាំនៅហុងកុងក្នុងព្រមានយ៉ាងម៉ឺងម៉ាត់ចំពោះភាគីអាមេរិកថា កុំលាបពណ៌ច្បាប់សន្តិសុខជាតិនៅហុងកុងដោយចេតនា. Cambodian CRI. May 25, 2012. <https://cambodian-cri-cn.translate.google.com/i/20210704/f06037a1-2462-16ca-affa->

[10f8817d67c7.html? x tr sch=http& x tr sl=km& x tr tl=en& x tr hl=en-US& x tr pto=nui.op.sc.](https://news.cgtn.com/news/2021-04-30/China-sends-vessels-to-assist-Indonesia-over-sunken-navy-submarine-ZT8r8Y3fi0/index.html)

- “Chinese military sends vessels to assist Indonesia over sunken navy submarine.” CGTN. Mar. 19, 2021. <https://news.cgtn.com/news/2021-04-30/China-sends-vessels-to-assist-Indonesia-over-sunken-navy-submarine-ZT8r8Y3fi0/index.html>.
- “Chinese Ministry of Foreign Affairs Denies Pompeo's 'Worried and Concerned' Statement on Chinese Fishing Vessel Operations on the High Seas.” Kemlu Tiongkok Bantah Pernyataan Pompeo Yang ‘Prihatin dan Khawatir’ pada Operasi Kapal Nelayan Tiongkok di Laut Lepas. Indonesian CRI. Sept. 11, 2020. <http://indonesian.cri.cn/20200911/35f2e69f-b8db-afb1-7ae3-14763f12a8c8.html>.
- “Chinese Navy Assists in Appointment of KRI Nanggala-402, China-Indonesia Military Cooperation to a New Level.” AL Tiongkok Bantu Pengangkatan KRI Nanggala-402, Kerja Sama Militer Tiongkok-Indonesia Ke Level Baru. Indonesian CRI. May 4, 2021. <http://indonesian.cri.cn/20210504/3a4cc4a6-ebb9-5b5d-cf07-d0e1166d36d9.html>.
- “Chinese navy helps lift sunken Indonesian submarine's life raft.” CGTN. May 19, 2021. <https://news.cgtn.com/news/2021-05-19/Chinese-navy-helps-lift-sunken-Indonesian-submarine-s-life-raft--10oaQAUCgOk/index.html>.
- “Chinese Poachers Barred from Returning to Palau.” *Island Times*. Jan. 15, 2021. <https://islandtimes.org/chinese-poachers-barred-from-returning-to-palau/>.
- “Chinese trawler caught illegal fishing in protected waters of Loango National Park.” Un chalutier chinois pris en flagrant délit de pêche illégale dans les eaux protégées du parc national de Loango. Direct Info Gabon. Aug. 18, 2019. <https://directinfosgabon.com/un-chalutier-chinois-pris-en-flagrant-delit-de-peche-illegale-dans-les-eaux-protegees-du-parc-national-de-loango/>.
- “Chinese Vessels Cleared of Illegal Fishing.” New Era Live. Apr. 1, 2020. <https://neweralive.na/posts/chinese-vessels-cleared-of-illegal-fishing>.
- “Chinese Vessels Found in Namibian Waters: Something Fishy?” Erongo. Mar. 30, 2020. <https://www.erongo.com.na/news/chinese-vessels-found-in-namibian-waters-2020-03-30>.
- “Chinese Vessels Spark New IUU Fishing Concerns.” Fishing Industry News. Apr. 1, 2020. <https://www.fishingindustrynewssa.com/2020/04/01/chinese-vessels-spark-new-iuu-fishing-concerns/>.
- Convention on Biological Diversity*. United Nations. 1992. CBD. <https://www.cbd.int/doc/legal/cbd-en.pdf>.
- Convention on the Determination of the Minimal Conditions for Access and Exploitation of Marine Resources within the maritime areas under the jurisdiction of the SRFC's Member States (Article 23 Regulation de l'accès à la pêche artisanale)*. Commission Sous-Regional Des Pêches Sus-Regional Fisheries Commission. June 8, 2012. Accessed Oct. 4, 2021. [https://spscrp.org/spscrp/sites/default/files/csrp/documents/csrp2012/csrp-CMA version originale juin 2012 fr.pdf](https://spscrp.org/spscrp/sites/default/files/csrp/documents/csrp2012/csrp-CMA%20version%20originale%20juin%202012%20fr.pdf).
- Convention on the International Regulations for Preventing Collisions at Sea, 1972 (COLREGs)*. International Maritime Organization. <https://www.imo.org/en/About/Conventions/Pages/COLREG.aspx>.
- “Convention Relative to Regional Fisheries Development in the Gulf of Guinea.” Convention Relative Au Développement Regional Des Pêches Dans Le Golfe De Guinée. UN Food

- and Agriculture Organization. Accessed Aug. 27, 2021. http://www.fao.org/fishery/docs/DOCUMENT/corep/convention_f.pdf.
- Copeland, Mary Utermohlen Duncan, and Austin Brush. *Spotlight on the Exploitation of Company Structures by Illegal Fishing Operators*. Trygg Mat Tracking and C4ADS. 2020. https://static1.squarespace.com/static/566ef8b4d8af107232d5358a/t/5fd21567ce71ee580fb1cb72/1607603565040/TMT-C4ADS_Spotlight+on+Transparency.pdf.
- Costa, Agustinus Beo Da. "Indonesia Says Spots Chinese Research Vessel in Its Waters, Tracker Off." Reuters. Jan. 14, 2021. <https://www.reuters.com/article/us-indonesia-maritime-china/indonesia-says-spots-chinese-research-vessel-in-its-waters-tracker-off-idUSKBN29J1IM>.
- Criminal Law of the People's Republic of China*. Fifth Session of the Eighth National People's Congress. Mar. 14, 1997. UN ILO. <https://www.ilo.org/dyn/natlex/docs/ELECTRONIC/5375/108071/F-78796243/CHN5375%20Eng3.pdf>.
- "The Curious Case of the SU RI BONG." Windward. Apr. 20, 2020. https://windward.ai/blog/the-curious-case-of-the-su-ri-bong/?_hstc=223907780.247746a74fcdc3c545949a2506cf5540.1626264487711.1626264487711.1626264487711.1&_hssc=223907780.2.1626264487712&_hsfp=1621161622.
- Daboe, Mustapha K. "Gambians protest alleged pollution from Chinese plant." *Anadolu Agency*. Mar. 22, 2018. Accessed Aug. 19, 2021. <https://www.aa.com.tr/en/africa/gambians-protest-alleged-pollution-from-chinese-plant/1096560#>.
- Dara, Mech. "Chinese People-Smuggling Ship Traveled Six Days, more than 2,500 Km: Authorities." *Voice of Democracy*. July 27, 2021. <https://vodenglish.news/chinese-people-smuggling-ship-traveled-six-days-more-than-2500-km-authorities/>.
- David, Nisha. "Source: Malaysia Releases Crew of Chinese Boats it Detained for Trespassing." *Benar News*. Oct. 22, 2020. <https://www.benarnews.org/english/news/malaysian/my-ch-boats-10222020180624.html>.
- De Klerk, Eveline. "Namibia: Chinese Trawlers Seized for Illegal Fishing." *New Era (Windhoek)*. Mar. 30, 2020. <https://neweralive.na/posts/chinese-trawlers-seized-for-illegal-fishing>.
- Decision of the People's Government of Hainan Province on Amending the "Regulations on the Administration of the Safety Production of Marine Fishing Vessels in Hainan Province" (海南省人民政府关于修改〈海南省海洋渔船安全生产管理规定〉的决定)*. People's Government of Hainan Province (海南省人民政府) Sept. 27, 2017. Accessed Sept. 30, 2021. <https://www.hainan.gov.cn/hainan/dfzfgz/201710/c6d50c366b5b4e679d1222b11b63834b.shtml>.
- Declarations of "Nouakchott 20 September 2001" and "Dakar 28 March 2014" on illegal, unregulated and unreported fishing*. Commission Sous-Regional Des Peches Sus-Regional Fisheries Commission. Mar. 28, 2014. Accessed Oct. 4, 2021. https://spsr.org/spsr/sites/default/files/csrp/documents/CSRP-2001-Decl_Nouakchott.pdf.
- Description and evaluation of fishery resources in the Mauritanian EZE (Description et evaluation des ressources halieutiques de la zee mauritanienne)*. UN Food and Agricultural

- Organization (FAO). Sept. 27, 1985. Accessed Oct. 4, 2021. <http://www.fao.org/3/r9048f/R9048F02.htm>.
- The Development of China's Marine Programs*. Permanent Mission of the People's Republic of China to the United Nations and Other International Organizations in Vienna. June 2. fmprc.gov. <https://www.fmprc.gov.cn/ce/cgvienna/eng/ljzg/zfbps/t127404.htm>.
- “DFW: 35 Indonesian Migrant Fishing Vessel Crew Die Abroad.” Destructive Fishing Watch. June 28, 2021. <https://dfw.or.id/35-indonesian-migrant/>.
- Diop, Maria. “Senegalese Fisherman Burned Alive by Chinese.” Seneweb.com. Sept. 25, 2020. <https://www.archyde.com/senegalese-fisherman-burned-alive-by-chinese/>.
- Discharge standard for water pollutants from ships [船舶水污染物排放标准]*. PRC Ministry of Environmental and Ecology. 2016. https://www.american-club.com/files/MA_082818_PRC_Discharge_Standards_for_Water_Pollutants_from_Ships_p3.pdf.
- Distant Water Fishing Supervisory Provisions/Provisions for the Administration of Pelagic Fishery [远洋渔业管理规定]*. Ministry of Agriculture. Apr. 14, 2003. Law of China. http://www.pkulaw.cn/fulltext_form.aspx?Db=chl&Gid=45795.
- “The Distinguished Force to Promote Sino-Mauritanian Friendly Cooperation.” القوة المميزة لتعزيز التعاون الودي بين الصين وموريتانيا. Embassy of the People's Republic of China in the Islamic Republic of Mauritania. June 20, 2018. https://www.fmprc-gov-cn.translate.google.com/ce/cemr/fra/xwdt/t1553589.htm?x_tr_sl=ar&x_tr_tl=en&x_tr hl=en&x_tr_pto=nui.sc.
- Dongyao, Li, and Cui Fandi. “China Attaches Great Importance to Malaysia's Detention of 60 Chinese Nationals: Embassy.” Global Times. Oct. 11, 2020. <https://www.globaltimes.cn/content/1203077.shtml>.
- Economic and Commercial Office of the Embassy in Ghana. “Counselor Gao Wenzhi Interviewed by the Special Issue of China-Africa Trade and Economic Cooperation in the International Business Daily.” Ministry of Commerce of the People's Republic of China. Mar. 30, 2012. Accessed Feb. 28, 2018. <http://www.mofcom.gov.cn/aarticle/i/dxfw/gzgd/201203/20120308044957.html>
- EJF Staff. *Stolen at Sea: How Illegal 'Saiko' Fishing Is Fueling the Collapse of Ghana's Fisheries*. June 2019. https://ejfoundation.org/resources/downloads/Stolen-at-sea_06_2019.pdf.
- “Embassy News.” Aktivitas Kedubes. Embassy of the People's Republic of China in the Republic of Indonesia. 2021. Accessed Sept. 20, 2021. <http://id.china-embassy.org/indo/sgdt/>.
- “Embassy Spokesperson Statement.” Facebook Page: Embassy of the People's Republic of China in the Republic of Namibia. Mar. 28, 2020. <https://www.facebook.com/profile/100064740756584/search/?q=fish>.
- Equatorial Guinea - Fishery Agreement between Equatorial Guinea and EEC of 1984*. FAOLEX. June 30, 1997. UN Food and Agriculture Organization. <https://www.fao.org/3/v9982e/v9982e1c.htm>.
- Fabunan, Sara Susanne D. “Sino Poachers Kill Coral Reefs.” Manila Standard. Sept. 24, 2016. <https://manilastandard.net/news/top-stories/216988/sino-poachers-kill-coral-reefs.html>.
- Ferrà, Carmen, Anna Nora Tassetti, Enrico Nicola Armelloni, Alessandro Galdelli, Giuseppe Scarcella, and Gianna Fabi. *Using AIS to Attempt a Quantitative Evaluation of Unobserved*

- Trawling Activity in the Mediterranean Sea*. *Frontiers in Marine Science*. 2020. <https://www.frontiersin.org/articles/10.3389/fmars.2020.580612/full>.
- Field, Michael. "Murky Background to Vanuatu's Chinese Fishing Boat Arrests." *Asia Pacific Report*. Jan. 27, 2021. <https://asiapacificreport.nz/2021/01/27/michael-field-murky-background-to-vanuatus-chinese-fishing-boat-arrests/>.
- "Filipino Scientists Seeded Giant Clams, Chinese Fishermen Stole Them." *ABS CBN*. Apr. 26, 2019. <https://news.abs-cbn.com/video/news/04/26/19/filipino-scientists-seeded-giant-clams-chinese-fishermen-stole-them>.
- Fisheries Act No. 10 of 2014, Part 14 - Ban on Driftnet Fishing*. Republic of Vanuatu. Accessed Aug. 18, 2021. UN FAO. <http://extwprlegs1.fao.org/docs/pdf/van143413.pdf>.
- Fisheries Act: Act 625, 2002*. June 30, 2003. <http://extwprlegs1.fao.org/docs/pdf/gha34737.pdf>.
- Fisheries and Aquaculture Code Law n 015 2005 [Code des pêches et de l'aquaculture Loi n°015/2005]*. Droit Afrique. 2005. Accessed Aug. 26, 2021. <http://www.droit-afrique.com/upload/doc/gabon/Gabon-Code-2005-peche-aquaculture.pdf>.
- Fisheries Law of the People's Republic of China (2013 Amendment) [Effective]*
[中华人民共和国渔业法(2013 修正) [现行有效]]. Ministry of Environment and Ecology. Dec. 28, 2013. Law of China. <http://www.lawinfochina.com/display.aspx?id=18148&lib=law>.
- Fisheries Law of the People's Republic of China (PRC Presidential Order No. 34 of 1986)*. Database of Laws and Regulations, National People's Congress. 1986. Accessed Aug. 19, 2021. http://www.ilo.org/dyn/natlex/natlex4.detail?p_lang=en&p_isn=37829&p_country=CHN&p_count=1183&p_classification=19&p_classcount=3.
- "Fisherman Burned in Confrontation with Chinese Trawler." *Africa Defense Forum*. Sept. 19, 2020. <https://adf-magazine.com/2020/11/fisherman-burned-in-confrontation-with-chinese-trawler/>.
- "Fishermen Tell Stories of Being Rammed and Sunk by Chinese Ships in the Paracels." *Ngu dân kể chuyện bị tàu Trung Quốc đâm chìm ở Hoàng Sa*. *Than Nien*. May 4, 2020. <https://thanhvien.vn/ngu-dan-ke-chuyen-bi-tau-trung-quoc-dam-chim-o-hoang-sa-post943046.html>.
- Forced Labor at Sea: The Case of Indonesian Migrant Fishers*. Greenpeace with Serikat Buruh Migran Indonesia (SBMI). 2021. Accessed Aug. 18, 2021. <https://www.greenpeace.org/static/planet4-southeastasia-stateless/2021/05/ef65bfe1-greenpeace-2021-forced-labour-at-sea-digital-final.pdf>.
- Foreign Ministry of the People's Republic of China. "Foreign Ministry Spokesperson Zhao Lijian's Regular Press Conference on July 15, 2021." July 15, 2021. https://www.fmprc.gov.cn/mfa_eng/xwfw_665399/s2510_665401/2511_665403/t1892361.shtml.
- "Foreign Ministry Spokesperson Hua Chunying's Regular Press Conference on October 9, 2020." Ministry of Foreign Affairs for the People's Republic of China. Oct. 9, 2020. https://www.fmprc.gov.cn/mfa_eng/xwfw_665399/s2510_665401/t1822871.shtml.
- "Foreign Ministry Spokesperson Wang Wenbin's Regular Press Conference on December 15, 2020." *China Daily*. Dec. 16, 2020. <https://govt.chinadaily.com.cn/s/202012/16/WS5fdac538498eaba5051bdbc1/foreign-ministry-spokesperson-wang-wenbins-regular-press-conference-on-december-15-2020.html>.

- “Foreign Ministry Spokesperson Wang Wenbin's Regular Press Conference on December 25, 2020.” Ministry of Foreign Affairs for the People's Republic of China. Dec. 25, 2020. https://www.fmprc.gov.cn/mfa_eng/xwfw_665399/s2510_665401/t1842734.shtml.
- “Foreign Ministry Spokesperson Wang Wenbin's Regular Press Conference on September 28, 2020.” Ministry of Foreign Affairs for the People's Republic of China. Sept. 28, 2020. https://www.fmprc.gov.cn/mfa_eng/xwfw_665399/s2510_665401/t1819548.shtml.
- “Foreign Ministry Spokesperson Zhao Lijian's ” China Daily Government. Sept. 10, 2020. <https://govt.chinadaily.com.cn/s/202009/10/WS5f5e046c498ed1e2f34093c7/foreign-ministry-spokesperson-zhao-lijians-regular-press-conference-on-september-10-2020.html>.
- “Foreign Ministry Spokesperson Zhao Lijian's Regular Press Conference on October 12, 2020.” Ministry of Foreign Affairs of the People's Republic of China. Oct. 12, 2020. https://www.fmprc.gov.cn/mfa_eng/xwfw_665399/s2510_665401/t1823343.shtml.
- “Foreign Ministry Spokesperson Zhao Lijian's Regular Press Conference on September 10, 2020.” Ministry of Foreign Affairs for the People's Republic of China. Sept. 10, 2020. https://www.fmprc.gov.cn/mfa_eng/xwfw_665399/s2510_665401/t1813877.shtml.
- “Foreign Ministry Spokesperson Zhao Lijian's Regular Press Conference on September 23, 2021.” Ministry of Foreign Affairs of the People's Republic of China. Sept. 23, 2021. https://www.fmprc.gov.cn/mfa_eng/xwfw_665399/s2510_665401/2511_665403/t1909182.shtml.
- “Fujian subsidies to the fishing sector bring trouble to West African waters.” الدعم الفوجياني لقطاع الصيد يجلب المتاعب لمياه غرب إفريقيا. Africa Defense Forum. Aug. 11, 2021. <https://adf-magazine-com.translate.goog/ar/2021/08/%D8%A7%D9%84%D8%AF%D8%B9%D9%85-%D8%A7%D9%84%D9%81%D9%88%D8%AC%D9%8A%D8%A7%D9%86%D9%8A-%D9%84%D9%82%D8%B7%D8%A7%D8%B9-%D8%A7%D9%84%D8%B5%D9%8A%D8%AF-%D9%8A%D8%AC%D9%84%D8%A8-%D8%A7%D9%84%D9%85%D8%AA/? x tr sl=ar& x tr tl=en& x tr hl=en& x tr p to=nui.sc>.
- “Gabon Cracks Down on Illegal Trawlers.” Livestock and Fisheries Chamber. 2020. Accessed Aug. 27, 2021. <https://livestockandfisherieschamber.com/gabon-cracks-down-on-illegal-trawlers/>.
- Gabon Fisheries and Aquaculture Law (2005 No. 015) Title 4 Chapter 3 - Repression of Offenses, Section 1 - Offenses [Titre 4, Chapitre 3 - De la Répression des Infractions, Section 1 - Des infractions]*. 2005. Droit-Afrique. <http://extwprlegs1.fao.org/docs/pdf/gab65652.pdf>.
- “Ghana: Suspension of Licensing of New Fishing Vessels With Effect From 1st February, 2012.” Fisheries Committee for the West Central Gulf of Guinea. Feb. 3, 2012. <https://fcwc-fish.org/other-news/ghana-suspension-of-licensing-of-new-fishing-vessels-with-effect-from-1st-february-2012>.
- Giant Clams Convention on International Trade in Endangered Species (CITES) – Vulnerable*. CITES. 1985. Accessed Sept. 27, 2021. <https://cites.org/sites/default/files/eng/com/ac/22/E22-10-2-A8e.pdf>.
- “Giant Clams Still on Sale in South China Despite Bans.” *Global Times*. Apr. 25, 2019. <https://www.globaltimes.cn/content/1147431.shtml>.

- Godfrey, Mark. "China Moves Forward with Investments in Gambia, Despite Protests." SeafoodSource. July 3, 2019. Accessed Aug. 19, 2021. <https://www.seafoodsource.com/news/supply-trade/china-moves-forward-with-investments-in-gambia-despite-protests>.
- Goodman, Joshua. "Great Wall of Lights: China's Sea Power on Darwin's Doorstep." AP and Univision. Sept. 24, 2021. <https://apnews.com/article/china-oceans-overfishing-squid-294ff1e489589b2510cc806ec898c78f>.
- "Government charged to protect Ghanaian nationals from abuse on foreign fishing vessels." Ghana Web. July 30, 2021. <https://www.ghanaweb.com/GhanaHomePage/NewsArchive/Government-charged-to-protect-Ghanaian-nationals-from-abuse-on-foreign-fishing-vessels-1320817>.
- Green, Matthew. "Ocean Shock: Fishmeal Factories Plunder Africa." Reuters. Oct. 30, 2018. Accessed Aug. 19, 2021 <https://www.reuters.com/article/us-oceans-tide-sardinella-specialreport-idUSKCN1N420W>.
- Griffiths, James. "Malaysia detains Chinese vessels for trespassing in territorial waters." CNN. Oct. 12, 2020. <https://www.cnn.com/2020/10/12/asia/malaysia-china-japan-sea-intl-hnk/index.html>.
- Gulle, Jimbo Owen B. "Sino Poachers Target Giant Clams in Palawan Waters." Manila Standard. Apr. 15, 2021. <https://manilastandard.net/news/top-stories/351892/sino-poachers-target-giant-clams-in-palawan-waters.html>.
- Gupta, Alok. "China cracks down on illegal deep sea fishing." CGTN. Mar. 2, 2018. <https://news.cgtn.com/news/796b444f35677a6333566d54/index.html>.
- "H.E. Ambassador Shi Ting Wang Attends the Ground Breaking Ceremony of AXIM Fishing Port." Embassy of People's Republic of China in the Republic of Ghana. Aug. 7, 2019. <http://gh.china-embassy.org/eng/sgxw/t1686978.htm>.
- Hartman, Adam. "Navy Intercepts Suspicious Fishing Vessels." The Namibian. Mar. 31, 2020. <https://www.namibian.com.na/199650/archive-read/Navy-intercepts-suspicious-fishing-vessels>.
- "Harvesting Giant Clams Has Led to 'Wanton Destruction' of Scarborough Shoal: Expert." ABS CBN. Apr. 17, 2019. <https://news.abs-cbn.com/spotlight/04/17/19/harvesting-giant-clams-has-led-to-wanton-destruction-of-scarborough-shoal-expert>.
- Hazard, Myrtle. "Palau and USCG Bust Chinese Vessel for Illegal Fishing." *Maritime Executive*. Dec. 24, 2020. <https://www.maritime-executive.com/article/palau-and-uscg-bust-chinese-vessel-for-illegal-fishing>.
- "Held: Fishing Trawlers Entered South African Waters Without Permission Due to Bad Weather." The Citizen (Gauteng). Apr. 24, 2020. https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwjRisyepsXzAhVNTTABHSTbDb4QFnoECAsQAQ&url=http%3A%2F%2Foverseas.mofa.go.kr%2Fza-ko%2Fbrd%2Fm_9938%2Fdown.do%3Fbrd_id%3D12753%26seq%3D1347306%26data_tp%3DA%26file_seq%3D1&usg=AOvVaw1oo2CiaA14IJE4UQFm7-Gi.
- Hunt, Louise. "Growing Tension over Illegal Fishing and Pollution in The Gambia." *Now This*. May 6, 2021. Accessed Aug. 19, 2021. <https://nowthisnews.com/earth/growing-tension-over-illegal-fishing-and-pollution-in-the-gambia>.
- Iita, Ndalimpinga. "Chinese Culture Radio Series Gaining Popularity in Namibia." Xinhua. Oct. 24, 2020. http://www.xinhuanet.com/english/2020-10/24/c_139464503.htm.

- Illegal, Unreported and Unregulated Fishing Strategic Outlook*. United States Coast Guard. 2020. <https://www.uscg.mil/iuufishing/>.
- “In a 600-Page Report on Human Trafficking in the United States, Only Half of the Pages Describe Its Problems in This Regard, with the Chinese Foreign Ministry Criticizing the United States for Perpetuating False Diplomacy.”
 ក្នុងរបាយការណ៍ស្តីពីការជួញដូរមនុស្សរបស់អាមេរិកដែលមានរហូតដល់ទៅ ៦០០ ទំព័រ មានតែកន្លះទំព័រប៉ុណ្ណោះដែលរៀបរាប់ពីបញ្ហារបស់ខ្លួន ទាក់ទិននឹងរឿងនេះ ក្រសួងការបរទេសចិនវិភាគអាមេរិកថា បានអនុវត្តការទូតបែបភូតកុហកជាប់រហូត.
 July 9, 2021. <https://cambodian-cri-cn.translate.google.com/20210709/82712c04-fc3b-7819-6996-b5f64eb8e814.html? x tr sch=http& x tr sl=km& x tr tl=en& x tr hl=en-US& x tr pto=nui.op.sc>.
- “Incredible China EP 26: China-Namibia Friendship; EP 15: China-Namibia Friendship Highlights in 2020.” Sound Cloud. Mar. 17; Jan. 2, 2021. <https://soundcloud.com/discover/sets/artist-stations:904960045>.
- “Indonesia Ends KRI Nanggala 402 Submarine Lifting Operation.” Indonesia Akhiri Operasi Pengangkatan Kapal Selam KRI Nanggala 402. Indonesian CRI. June 3, 2021. <http://indonesian.cri.cn/20210603/d326421e-f138-8ee8-906b-999eb8f8e624.html>.
- Indonesian Government Regulation No. 37 on the Rights and Obligations of Foreign Ships and Aircraft Exercising the Right of Archipelagic Sea Lane Passage Through Designated Archipelagic Sea Lanes, 28 June 2002*. National legislation - DOALOS/OLA - United Nations - INDONESIA. June 28, 2020. Accessed Sept. 20, 2021. https://www.un.org/Depts/los/doalos_publications/LOSBulletins/bulletinpdf/bulletin52e.pdf.
- International Convention for the Prevention of Pollution from Ships (MARPOL)*. UN International Maritime Organization. Accessed July 16, 2021. [https://www.imo.org/en/About/Conventions/Pages/International-Convention-for-the-Prevention-of-Pollution-from-Ships-\(MARPOL\).aspx](https://www.imo.org/en/About/Conventions/Pages/International-Convention-for-the-Prevention-of-Pollution-from-Ships-(MARPOL).aspx).
- International Convention for the Safety of Life at Sea (SOLAS), 1974*. International Maritime Organization. 1974. Accessed Sept. 21, 2021. [https://www.imo.org/en/About/Conventions/Pages/International-Convention-for-the-Safety-of-Life-at-Sea-\(SOLAS\)-1974.aspx](https://www.imo.org/en/About/Conventions/Pages/International-Convention-for-the-Safety-of-Life-at-Sea-(SOLAS)-1974.aspx).
- International Convention for the Safety of Life at Sea, 1974; China ratified May 25, 1980*. Secretary-General of the Intergovernmental Maritime Consultative Organization. Jan. 11, 1974. Accessed Sept. 21, 2021. <https://treaties.un.org/pages/showDetails.aspx?objid=08000002800ec37f>.
- “Intersessional Work on Improving Labour Standards for Crew on Fishing Vessels (2021).” Western & Central Pacific Fisheries Commission. Aug. 1, 2021. https://www.wcpfc.int/labour_standards.
- “Interview: Chairman of the Ruling Party in Mauritania: The Chinese Communist Party Is Leading China to Achieve Unprecedented Development.” مقابلة: رئيس الحزب الحاكم في موريتانيا: الحزب الشيوعي الصيني يقود الصين إلى تحقيق تنمية غير مسبوقة. CRI Arabic. July 16, 2021. http://arabic.news.cn/2021-07/16/c_1310065216.htm.
- Issa, Mikaila. “A Good Day for People and for the Ocean: Greenpeace Lauds Gambia’s Government for Stopping the Expansion of Major Fishmeal and Fish Oil Plant.” Greenpeace. Apr. 6, 2021. <https://www.greenpeace.org/africa/en/press/13437/a->

[good-day-for-people-and-for-the-ocean-greenpeace-lauds-gambias-government-for-stopping-the-expansion-of-major-fishmeal-and-fish-oil-plant/](#).

“It Is Better to Advance the Fisheries Agreement with China.” Mas magandang isulong ang Fisheries Agreement sa Tsina. Filipino CRI. Nov. 17, 2017. https://filipino-cri-cn.translate.google.com/301/2017/11/17/109s152848.htm?x_tr_sch=http&x_tr_sl=tl&x_tr_tl=en&x_tr_hl=en&x_tr_pto=nui.sc.elem.

“The Japanese Destroyer Collided with a Chinese Fishing Boat and Returned to Hong Kong. The Side of the Apron Was Knocked out of a Crack.” 日本驱逐舰与中国渔船相撞后返港 停机坪侧面被撞出裂口. People's Daily. 人民日报. Apr. 14. <http://military.people.com.cn/n1/2020/0414/c1011-31672945.html>.

Jianxin, Hou. “Foreign media: Vanuatu detains a Russian yacht and two Chinese fishing boats.” 外媒：瓦努阿图扣留一艘俄游艇和两艘中国渔船. *Global Times* 环球网. Jan. 30, 2021. <https://world.huanqiu.com/article/41jCQrAoE56>.

Jingjing, Ma. “US Mounts ‘Forced Labor’ Lies on Fishing Firm to Serve Strategy of Containing China Following Attack on Xinjiang Industries.” *Global Times*. May 29, 2021. <https://www.globaltimes.cn/page/202105/1224800.shtml>.

Jr., E.F. Smalls. “The Gambia: Chinese Fishmeal Company Burnt Down by Angry Protesters.” Eye Gambia. Mar. 15, 2021. <https://eyegambia.org/the-gambia-chinese-fishmeal-company-burnt-down-by-angry-protesters/>.

Keita, Musa. “Gunjur – Court Orders Stay on Chinese Golden Lead Fish-Meal Expansion Spree.” *Chronicle Gambia*. June 17, 2021. <https://www.chronicle.gm/gunjur-court-orders-stay-on-chinese-golden-lead-fish-meal-expansion-spree/>.

Kuo, Lily. “Gambians Are Accusing a Chinese Company of Destroying Their Coastline.” *Quartz*. May 29, 2017. Accessed Aug. 19, 2021 <https://qz.com/africa/993840/gambians-and-environmentalists-are-accusing-chinese-company-golden-leaf-of-destroying-their-coastline/>.

“Lancang-Mekong Cooperation: After Five Fruitful Years, a New Journey Awaits.” Ministry of Foreign Affairs of the People's Republic of China. Apr. 14, 2021. <https://www.fmprc.gov.cn/ce/cemm/eng/sgxw/t1868878.htm>.

“Lancang-Mekong Countries Launch Joint Crackdown on Human Trafficking.” Xinhua. Sept. 3, 2019. http://xinhuanet.com/english/2019-09/03/c_138362117.htm.

Lanlan, Huang, Li Qiao, and Hu Yuwei. “Western-Aligned Opposition Forces in Cambodia Exaggerate Anti-China Sentiment.” *Global Times*. Jan. 14, 2020. <https://www.globaltimes.cn/content/1176808.shtml>.

Law on Suppression of Human Trafficking and Sexual Exploitation Article 18: Cross-border Transportation (The Act of Bringing a Person Cross-border). Kingdom of Cambodia. 2007. Accessed Oct. 14, 2021. UNICEF and ILO. https://www.ilo.org/dyn/natlex/natlex4.detail?p_lang=en&p_isn=93355.

“Lianyungang Maritime Investigation and Punishment of a Fishing Vessel Illegally Installing Cargo Ship AIS.” 连云港海事查处一起渔船违法安装货船 AIS 行为. Xinhua. 新华社. Apr. 8, 2021. http://www.js.xinhuanet.com/2021-04/08/c_1127306535.htm.

De Lima Seeks Inquiry into the Dumping of Human Waste by Chinese Ships in the WPS. Senate of the Philippines, 18th Congress. July 17, 2021. http://legacy.senate.gov.ph/press_release/2021/0717_delima2.asp.

- Long, Drake. "US Condemns Sinking of Vietnam Fishing Vessel by Chinese Coast Guard." Radio Free Asia. Apr. 6, 2020. <https://www.rfa.org/english/news/china/vietnam-southchinasea-04062020154618.html>.
- Mai, Valerie. "The Indonesian Patrol Vessel Blocked the Chinese Research Vessel in Sunda Strait." *Vietnam Times*. Jan. 20, 2021. <https://vietnamtimes.org.vn/the-indonesian-patrol-vessel-blocked-the-chinese-research-vessel-in-sunda-strait-27492.html>.
- Malarky, Lacey, and Beth Lowell. "Avoiding Detection: Global Case Studies of Possible AIS Avoidance." *Oceana*. Mar. 2018. <https://usa.oceana.org/publications/reports/avoiding-detection-global-case-studies-possible-ais-avoidance>.
- "Malaysia Detained 60 Fishermen from 6 Chinese Fishing Boats? Chinese Embassy Response." (马来西亚扣留中国 6 艘渔船 60 名渔民? 中国使馆回应). *Global Times*. (环球时报). Oct. 11, 2020. <https://world.huanqiu.com/article/40EumM0Hosn>.
- "Malaysia Detains 6 Chinese Fishing Boats, Dozens of Seamen in Waters off Johor." *South China Morning Post*. Oct. 10, 2020. <https://www.scmp.com/news/asia/southeast-asia/article/3104991/malaysia-detains-6-chinese-fishing-boats-dozens-seamen>.
- Malaysia Merchant Shipping Ordinance 1952 [Ord. 70/1952]*. 1952. Accessed Sept. 21, 2021. International Labor Organization NATLEX. https://www.ilo.org/dyn/natlex/natlex4.detail?p_lang=&p_isn=89550.
- "Malaysia Seizes Six Illegal Chinese Fishing Vessels, Arrests 60 Men." *Business Standard*. Oct. 11, 2020. https://www.business-standard.com/article/international/malaysia-seizes-six-illegal-chinese-fishing-vessels-arrests-60-men-120101100054_1.html.
- Mallory, Tabitha, and Ian Ralby. "Evolution of the Fleet: A Closer Look at the Chinese Fishing Vessels off the Galapagos." *CIMSEC*. Oct. 19, 2020. <https://cimsec.org/evolution-of-the-fleet-a-closer-look-at-the-chinese-fishing-vessels-off-the-galapagos/>.
- Manneh, Alagie. "China condemns assault on Sanyang fishmeal factory." *Standard Gambia*. Mar. 25, 2021. <https://standard.gm/china-condemns-assault-on-sanyang-fishmeal-factory0/>.
- "Map of Parties to the London Convention/Protocol." UN International Maritime Organization. Feb. 22, 2019. <https://wwwcdn.imo.org/localresources/en/OurWork/Environment/Documents/Parties%20to%20the%20LCLP%20February%202019.pdf>.
- Marine Environmental Protection Law of the People's Republic of China [中华人民共和国海洋环境保护法]*. Ministry of Environment and Ecology. 2017. https://www.mee.gov.cn/ywgz/fgbz/fl/201805/t20180517_440477.shtml.
- Marine Traffic Act 2 of 1981* Republic of Namibia. 1981. Legal Assistance Center of Namibia. <http://www.lac.org.na/laws/annoSTAT/Marine%20Traffic%20Act%202%20of%201981.pdf>.
- Maritime Zones Act 2010, Part 4, Rights and jurisdiction of Vanuatu in its exclusive economic zone* Republic of Vanuatu. 2010. Accessed Aug. 18, 2021. https://www.ffa.int/system/files/Maritime_Zones_Act_2010.pdf.
- "Mauritania: 3 Fishermen Died After Their Boat Collided with a Chinese Ship, and the Matter Worsened." (موريتانيا: هلاك 3 صيادين إثر إصطدام قاربهم بسفينة صينية و الأمر يزيد تأزما). *El Hayat*. Oct. 10, 2020. <https://www-elhayatonline-dz.translate.google/%D9%85%D9%88%D8%B1%D9%8A%D8%AA%D8%A7%D9%86%D9%8A%D8%A7-%D9%87%D9%84%D8%A7%D9%83-3->

https://www.skonic.com/en/%D9%85%D9%88%D8%B1%D9%8A%D8%AA%D8%A7%D9%86%D9%8A%D8%A7-%D9%87%D9%84%D8%A7%D9%83-3-%D8%B5%D9%8A%D8%A7%D8%AF%D9%8A%D9%86-%D8%A5%D8%AB%D8%B1-%D8%A5%D8%B5%D8%B7%D8%AF%D8%A7%D9%85-%D9%82%D8%A7%D8%B1%D8%A8/?x_tr_sl=ar&x_tr_tl=en&x_tr_hl=en&x_tr_pto=nui.sc

“Mauritania: 3 Fishermen Were Killed After Their Boat Collided with a Chinese Ship.” موريتانيا: هلاك 3 صيادين إثر إصطدام قاربهم بسفينة صينية. Skonic. Oct. 11, 2020. <https://skonic.com/en/%D9%85%D9%88%D8%B1%D9%8A%D8%AA%D8%A7%D9%86%D9%8A%D8%A7-%D9%87%D9%84%D8%A7%D9%83-3-%D8%B5%D9%8A%D8%A7%D8%AF%D9%8A%D9%86-%D8%A5%D8%AB%D8%B1-%D8%A5%D8%B5%D8%B7%D8%AF%D8%A7%D9%85-%D9%82%D8%A7%D8%B1%D8%A8/#fwdmplayer0?catid=0&trackid=0>

McGarry, Dan. “Chinese Fishing Captains Face Jail, Big Fines for Alleged Illegal Fishing in Vanuatu.” *The Guardian*. Feb. 16, 2021. <https://www.theguardian.com/world/2021/feb/17/chinese-fishing-captains-face-jail-big-fines-for-alleged-fishing-in-vanuatu>.

McManus, Dr. John. *Massively Destructive Coral Reef Damage from Giant Clam Shell Digging in the South China Sea*. OpenChannels. 2019. <https://vimeo.com/342103171>.

McVeigh, Karen, and Nancy Dzradosi. “The Vanishing: Ghana’s Defenders Face New Perils in Fight Against Overfishing.” *The Guardian*. Nov. 16, 2019. <https://www.theguardian.com/environment/2019/nov/16/ghana-fisheries-observer-vanishes>.

McVeigh, Karen, and Febriana Firdaus. “‘Hold on, brother’: the final days of the doomed crew on the Long Xing 629.” *The Guardian*. July 7, 2020. <https://www.theguardian.com/environment/2020/jul/07/hold-on-brother-final-days-of-doomed-crew-on-chinese-shark-finning-boat>.

Mei, Ming. “Interview: Ghanaian official applauds Chinese support for her community.” Xinhua. July 27, 2019. http://www.xinhuanet.com/english/2019-07/27/c_138263245.htm.

Methri, Gloria. “Chinese Research Vessel Intercepted in Indonesian Waters; Hints at Underwater Ops.” *Republic World*. Jan. 17, 2021. <https://www.republicworld.com/world-news/china/chinese-research-vessel-intercepted-in-indonesian-waters-hints-at-underwater-ops.html>.

“The Ministry of Agriculture and Rural Affairs and the Ministry of Transport jointly launched a special action to prevent and curb collisions between commercial and fishing boats.” 农业农村部交通运输部联合开展专项行动防范遏制商渔船碰撞事故 Ministry of Agriculture and Rural Affairs. 农业农村部网站. July 29, 2021. http://www.gov.cn/xinwen/2021-07/29/content_5628103.htm.

“The Ministry of Foreign Affairs Talks About the Collision of Chinese and Philippine Fishing Boats: I Believe the Two Sides Can Properly Handle the Matter.” 外交部谈中菲渔船相撞：相信双方能够妥善处理此事. Xinhua. 新华社. June 17, 2019. http://www.xinhuanet.com/world/2019-06/17/c_1124635672.htm.

“The Ministry of Foreign Affairs Talks About the Collision of Chinese and Philippine Fishing Boats: It Is Recommended to Initiate a Joint Investigation As Soon As Possible.” 外交部谈中菲渔船相撞事件：建议尽快启动联合调查. Xinhua. 新华社. June 20, 2019. http://www.xinhuanet.com/world/2019-06/20/c_1124650679.htm.

- MOFAD Ghana. "WARFP Ghana Project Overview." Ministry of Fisheries and Aquaculture Development, Republic of Ghana. Accessed Sept. 9, 2021. <https://www.mofad.gov.gh/projects/west-africa-regional-fisheries-programme/warfp-ghana-project-overview/>.
- "More than ten whales visible in southern China [Plus de dix baleines visibles dans le sud de la Chine]." *Xinhua French*. Mar. 30, 2018. http://french.xinhuanet.com/2018-03/30/c_137077920.htm.
- Mounombou, Stevie. "Illegal Fishing: Two Trawlers in the Nets of Operation Albacore." *Pêche illicite: Deux chalutiers dans les filets de l'opération Albacore*. *Gabon Review*. Aug. 20, 2020. <https://www.gabonreview.com/peche-illicite-deux-chalutiers-dans-les-filets-de-loperation-albacore/>.
- Named. "Six Chinese fishing boats were detained in Johor waters " Enam bot nelayan China ditahan masuk perairan Johor. *MalaysiaKini*. Oct. 11, 2020.
- Namibia Press Agency. "Six Chinese Fishing Vessels Under Investigations." *Namibia News Digest*. Mar. 31, 2020. <https://www.namibianewsdigest.com/six-chinese-fishing-vessels-under-investigations/>.
- Namibia Promulgation of Marine Resources Act, 2000 (Act 27 of 2000)*. FAOLEX. 2000. UN Food and Agriculture Organization. <http://extwprlegs1.fao.org/docs/pdf/nam44344.pdf>.
- NASA. "Chlorophyll a (chlora)." *Earth Data*. Accessed Aug. 9, 2021. https://oceancolor.gsfc.nasa.gov/atbd/chlor_a/.
- National Environmental Agency Gambia. STOP NOTICE. Subject: Golden Lead Import & Export Co. Ltd. Mar. 10, 2021. https://drive.google.com/file/d/19J3vcNCLZH6v_pYG4egwkIGT6RAumUd/view.
- National Task Force for the West Philippine Sea. "Statement on the Presence of China's Maritime Militia at the West Philippine Sea." *PTV News*. Mar. 20, 2021. <https://ptvnews.ph/national-task-force-for-the-west-philippine-sea-statement-on-the-presence-of-chinas-maritime-militias-at-the-west-philippine-sea/>.
- Njeru, Gitonga. "Chinese companies get go-ahead to operate in a range of industries in Mauritania " *Beijing Review*. June 18, 2019. http://www.bjreview.com/World/201906/t20190618_800171021.html.
- Notice of the Ministry of Agriculture and Rural Affairs on the Issuance of the "Measures for the Administration of Monitoring the Position of Ocean Fishing Vessels"* (农业农村部关于印发《远洋渔船船位监测管理办法的通知》). Ministry of Agriculture and Rural Affairs (农业农村部) Aug. 19, 2018. Accessed Sept. 30, 2021. http://www.gov.cn/xinwen/2019-08/19/content_5422285.htm.
- Notice of the Ministry of Agriculture, the Ministry of Foreign Affairs, the Ministry of Public Security, and the Ministry of Human Resources and Social Security on Continuing the Zhoushan, Zhejiang Pilot Work of Introducing Foreign Crews in the Ocean Fishing Industry* [农业部 外交部 公安部 人力资源社会保障部关于继续在舟山市开展远洋捕捞行业 引进外籍船员试点工作的通知]. Dec. 4, 2017. PRC Ministry of Agriculture. http://www.moa.gov.cn/nybgb/2014/derq/201712/t20171219_6104794.htm.
- "Nouadhibou: A Chinese ship kills four Mauritanian fishermen." *نواذيبو: باخرة صينية تتسبب في مقتل أربعة صيادين موريتانيين*. *El Hiyad*. July 26, 2017. <https://elhiyad-info.translate.goog/node/4413? x tr sch=http& x tr sl=ar& x tr tl=en& x tr hl=en& x tr pto=nui.s>

- Ochona, Zandro. "More Chinese Ships May Be Dumping Wastes in Spratlys: Satellite Imagery Expert." *ABS CBN News*. July 15, 2021. <https://news.abs-cbn.com/news/07/15/21/similarity-report-china-ships-dumping-wastes-spratlys-july152021>.
- Oirere, Shem. "Foreign Trawler in Illegal Fishing Venture Nabbed in Ghana." *Seafood Source*. Oct. 22, 2019. <https://www.seafoodsource.com/news/supply-trade/foreign-trawler-in-illegal-fishing-venture-nabbed-in-ghana>.
- Okai, Efua Konyim. "Gambians Torch Chinese Fishmeal Plant." *The Fish Site*. Mar. 25, 2021. Accessed Aug. 9, 2021. <https://thefishsite.com/articles/gambians-torch-chinese-fishmeal-plant>.
- "Over 300 Smuggled Endangered Species Items Seized in NE China." *Xinhua*. May 19, 2019. http://www.xinhuanet.com/english/2019-05/19/c_138070724.htm.
- Palau National Code regarding foreign fishing, Division 1 of Title 27*. Palau National Code (PNC). 1990. Accessed Aug. 15, 2021. ECOLEX. <http://extwprlegs1.fao.org/docs/pdf/pau36480.pdf>.
- Park, Jaeyoon. "A 2020 Analysis: Detecting the Dark Fleets in North Korea and Russia." *Global Fishing Watch*. Jan. 20, 2021. <https://globalfishingwatch.org/fisheries/2020-analysis-dark-fleets/>.
- Pazzibugan, Dona Z., Jhesset O. Enano, and Julie M. Aurelio. "PH Protests China's Harvest of Giant Clams." *Global Nation*. Apr. 17, 2019. <https://globalnation.inquirer.net/174536/ph-protests-chinas-harvest-of-giant-clams>.
- People's Republic of China Embassy in the Philippines. "Chinese Embassy Spokesperson Answers Question on a Report of Alleged Chinese Ships Dumping Waste in the South China Sea." July 16, 2021. <http://ph.china-embassy.org/eng/sgdt/t1892713.htm>.
- Philippine fisheries code Republic Act No. 8550*. Congress of the Philippines Tenth Congress. Feb. 25, 1998. Accessed Sept. 26, 2021. UN FAOLEX. <http://extwprlegs1.fao.org/docs/pdf/phi16098.pdf>.
- "Philippines' Duterte says it's senseless to confront China in South China Sea." *CGTN*. July 23, 2019. <https://news.cgtn.com/news/2019-07-23/Duterte-defends-his-China-policy-in-annual-address--IykPIeMGcg/index.html>.
- Philippines' Wildlife Protection Act Republic Act No. 9147*. Congress of the Philippines Eleventh Congress. July 30, 2001. Accessed Sept. 26, 2021. *Philippines Official Gazette*. <https://www.officialgazette.gov.ph/2001/07/30/republic-act-no-9417/>.
- Phillips-Levine, Trevor, Dylan Phillips-Levine, and Walker Mills. "How NGOs Can Help Keep Tabs on China's Illegal Fishing Activity." *Maritime Executive*. Oct. 20, 2020. <https://www.maritime-executive.com/editorials/how-ngos-can-help-keep-tabs-on-china-s-illegal-fishing-activity>.
- . "Leveraging NGOs and Volunteerism for Maritime Surveillance Against IUU Fishing." *CIMSEC*. Oct. 20, 2020. <https://cimsec.org/category/ocean-governance/>.
- "Pollution: Clandestine Treatment of Garbage in China." *Pollution: Traitement clandestin des ordures en Chine*. *People's Daily French*. le Quotidien du Peuple en ligne 2017. https://french-people-com-cn.translate.google.com/translate/n3/2017/0223/c96851-9181873.html?x_tr_sch=http&x_tr_sl=fr&x_tr_tl=en&x_tr_hl=en&x_tr_pto=nui.sc.lem.

- “PRC Ambassador to Namibia Facebook Post about Tunacor Fisheries Ltd.” Facebook Page: PRC Ambassador to Namibia Yiming Zhang. June 30, 2019. <https://www.facebook.com/profile/100022338870646/search/?q=fish>.
- PRC Embassy in Gambia Spokesperson. “Discussions on the Burnt-Down Sanyang Fishmeal Factory Should Be Constructive.” People's Republic of China Embassy in Gambia. Apr. 14, 2021. <http://gm.china-embassy.org/eng/sgxw/t1868724.htm>.
- PRC MFA English-Chinese Weibo Account. “Regular Press Conference (2020-12-15).” 双
语
例
行
记
者
会 . Weibo. Dec. 16, 2020. <https://weibo.com/ttarticle/p/show?id=2309404582715696480264>.
- “President Xi Jinping held talks with his Mauritanian counterpart, Mohamed Ould Abdel Aziz, and stressed efforts to be made jointly to give new impetus to Sino-Mauritanian friendly cooperation.” أجرى الرئيس شي جينبينغ محادثات مع نظيره الموريتاني محمد ولد عبد العزيز وأكد علي
بذل جهود مشتركة لاضفاء قوة دافعة جديدة للتعاون الصيني الموريتاني الودي
Ministry of Foreign Affairs for the People's Republic of China. Sept. 16, 2015. <https://www.fmprc.gov.cn/zalt/ara/zajw/t1297216.htm>.
- “President Xi Jinping Speaks with Namibian President Hage Geingob on the Phone.” Ministry of Foreign Affairs of the People's Republic of China. Apr. 3, 2020. https://www.fmprc.gov.cn/mfa_eng/wjb_663304/zjzg_663340/fzs_663828/xwlb_663830/t1766118.shtml.
- “Press Release on the So-Called Collision of Fishing Boats Between China and the Philippines.” Embassy of the People's Republic of China in the Republic of the Philippines. June 15, 2019. <http://ph.china-embassy.org/eng/sgfyrbt/t1672506.htm>.
- “The Productive Livelihood on the South China Sea in Chinese History.” Embassy of the People's Republic of China in the Republic of the Philippines. May 25, 2016. <http://ph.china-embassy.org/eng/zt/nhwt/t1366336.htm>.
- Pultra, Benjamin. “PH to Finally Get Compensation Offer for Gem-Ver Incident.” Philippines News Agency. 2021. <https://www.pna.gov.ph/articles/1142951>.
- Ralby, Ian. “Looking Past Gulf of Guinea Piracy: Chinese Twins, 'Ghanaian' Fishing, and Domain Awareness.” CIMSEC. Mar. 17, 2021. <https://cimsec.org/category/ocean-governance/>.
- Ramos, Marlon. “Remember Gem-Ver? Redress for PH Fishermen Still Stuck in Talks.” Philippine Daily Inquirer. June 9, 2021. <https://newsinfo.inquirer.net/1443586/remember-gem-ver-redress-for-ph-fishermen-still-stuck-in-talks>.
- Regulations for Carriage of AIS*. UN International Maritime Organization. Dec. 31, 2004. Accessed Sept. 20, 2021. <https://www.imo.org/en/OurWork/Safety/Pages/AIS.aspx>.
- Regulations on the protection of coral reefs and clams in Hainan Province (海南省珊瑚礁和砗磲保护规定)*. Qionghai, Hainan, China Government. May 24, 2021. Accessed Sept. 27, 2021. http://qionghai.hainan.gov.cn/zfxxgkzl/bm/gongsj/gkml/202105/t20210524_2983261.html.
- “Remarks by H.E. Ambassador Xin Shunkang at the Zambezi Bream Festival and Cultural Expo.” Embassy of the People's Republic of China in the Republic of Namibia. Aug. 12, 2015. <http://na.china-embassy.org/eng/sgxw/t1288538.htm>.
- Revised Guidelines for the Onboard Operational Use of Shipborne Automatic Identification Systems (AIS)*. International Maritime Organization. Dec. 2, 2015. Accessed Oct. 1, 2021.

- https://www.navcen.uscg.gov/pdf/ais/references/IMO_A1106_29_Revised_guideline_s.pdf.
- “ S. China Sea Corals on Brink of Extinction.” *Global Times*. May 24, 2016. <https://www.globaltimes.cn/content/984745.shtml>.
- Sabillo, Kristine. “Satellite Data: Chinese Vessel in Reed Bank Incident Often Went 'Dark'.” ABS-CBN News. June 20, 2019. <https://news.abs-cbn.com/news/06/20/19/satellite-data-chinese-vessel-in-reed-bank-incident-often-went-dark>.
- Samari, Mona. *How Ghana's Weak Penalties Are Letting Trawlers Off the Hook*. China Dialogue Ocean. doi: Oct. 3, 2019. <https://chinadialogueocean.net/10522-ghana-weak-penalties-let-trawlers-off-the-hook/>.
- . “Investigation Ties Foreign-Owned Trawlers to Illegal Fishing in Ghana.” China Dialogue Ocean. Sept. 12, 2019. <https://chinadialogueocean.net/10050-investigation-illegal-fishing-in-ghana-pt-1/>.
- SEAFO Convention on fishing Logbook*. South East Atlantic Fisheries Organisation. Accessed Oct. 12, 2021. <http://www.seafo.org/About/Convention-Text>.
- “The Second Batch of Chinese Medical Aid Delivered to Mauritania.” تسليم الدفعة الثانية من المساعدات الطبية الصينية إلى موريتانيا. CRI Arabic. Apr. 21, 2020. https://arabic-cri-cn.translate.google.com/news/china/438/20200421/456053.html?x_tr_sch=http&x_tr_sl=ar&x_tr_tl=en&x_tr_hl=en&x_tr_pto=nui.sc.
- “A Senegalese Fisherman Burned Alive by Chinese off the Coast of Gambia.” Un pêcheur sénégalais brûlé vif par des Chinois. Fandene TV Facebook Page. Sept. 25, 2020. <https://m.facebook.com/413024349490289/photos/a.454433722016018/777875543005166/?type=3&rdr>.
- Septiari, Dian, and Novan Iman Santosa. “Bakamla Intercepts Chinese Research Vessel in Sunda Strait.” *The Jakarta Post*. Jan. 17, 2021. <https://www.thejakartapost.com/news/2021/01/16/bakamla-intercepts-chinese-research-vessel-in-sunda-strait.html>.
- “Shenzhen Authorities Intercept Clam Shell Products.” China Daily. Sept. 19, 2017. https://www.chinadaily.com.cn/china/2017-09/19/content_32198728.htm.
- Similarity. “Sewage from Anchored Ships Is Damaging Spratly Reefs.” South China Sea Rapid Alert Reports. July 12, 2021. <https://similarity.com/july-2021-water-quality-in-spratleys-report/>.
- Sipalan, Joseph. “Malaysia Detains 60 Chinese Nationals, 6 Vessels for Trespassing.” Reuters. Oct. 10, 2020. <https://www.reuters.com/article/us-malaysia-china-boats-idUSKBN26V0FX>.
- “Smuggled Chinese on Ship Test Positive for COVID.” Cambodia News English. July 30, 2021. <https://cne.wtf/2021/07/30/smuggled-chinese-on-ship-test-positive-for-covid/>.
- “Solidarity, synergy, cooperation and win-win warm congratulations on the 55th anniversary of the establishment of diplomatic relations between China and Mauritania, by Mr. Zhang Jianguo, Chinese Ambassador to Mauritania.” التضامن والتآزر والتعاون والفوز المشترك كالتنهانى الحارة بمناسبة الذكرى السنوية الـ 55 لإقامة العلاقات الدبلوماسية بين الصين وموريتانيا بقلم السيد جانغ جيان قوه سفير الصين لدى موريتانيا. Embassy of the People’s Republic of China in the Islamic Republic of Mauritania. July 19, 2020. https://www.fmprc.gov-cn.translate.google.com/ce/cemr/fra/sbgx/t1798790.htm?x_tr_sl=ar&x_tr_tl=en&x_tr_hl=en&x_tr_pto=nui.sc.

- Somers, Adam. "Chinese fishing boat stripped and escorted out of Palau." *Island Times*. Jan. 5, 2021. <https://islandtimes.org/chinese-fishing-boat-stripped-and-escorted-out-of-palau/>.
- . "US Embassy Commends ROP Government and Condemns Chinese IUU Fishing." *Island Times*. Dec. 22, 2020. <https://islandtimes.org/us-embassy-commends-rop-government-and-condemns-chinese-iuu-fishing/>.
- South China Sea Probing Initiative (SCSPI). "Twitter Thread About Similarity Report Chlorophyll Analysis." Twitter. July 15, 2021. https://twitter.com/SCS_PI/status/1415869066200248320.
- . "Twitter Thread about Similarity Report Funding." Twitter. July 16, 2021. https://twitter.com/SCS_PI/status/1416223221834153984.
- "Spokesperson of Chinese Embassy to Indonesia Answers Reporters' Question Regarding Indonesian Crew Members Who Passed Away on a Chinese Fishing Vessel and Relevant Issues [Juru Bicara Kedutaan Tiongkok untuk Indonesia kembali menjawab pertanyaan wartawan mengenai masalah yang melibatkan ABK WNI di sebuah kapal perikanan]." May 20. Accessed Aug. 19, 2021. <http://id.china-embassy.org/indo/xwdt/t1780830.htm>.
- "The Spokesperson of the Chinese Embassy in Cambodia Made a Statement on the Cambodian Media's Report on the "China Town" In Sihanoukville." 中国驻柬埔寨使馆发言人就柬媒体报道西哈努克省“中国城”有关情况发表谈话. Embassy of the People's Republic of China in Cambodia. Sept. 8, 2021. <http://kh.china-embassy.org/chn/dssghd/t1905615.htm>.
- "The start of the "Covid-19" vaccination process in Mauritania." 19-كوفيد-19 انطلاق عملية التطعيم بلقاح. في موريتانيا. CGTN Arabic. Mar. 27, 2021. <https://arabic-cgtn.com.translate.goog/n/BfJEA-cA-GcA/FIeJEA/index.html? x tr sl=ar& x tr tl=en& x tr hl=en& x tr pto=nui.sc>.
- "Statement from the Filipino side, with a political purpose." [Pahayag mula sa panig Pilipino, may layuning pampulitika]. Filipino CRI. Jan. 20, 2016. <https://filipino-cri-cn.translate.goog/301/2016/01/20/2s141349.htm? x tr sch=http& x tr sl=tl& x tr tl=en& x tr hl=en& x tr pto=nui.sc.elem>.
- "Statement of the Spokesperson of the Chinese Embassy on the U.S.'s accusation of illegal, unreported, and unregulated ocean fishing." (驻密使馆发言人关于美国指责我非法、未报告、无管制远洋捕鱼的表态). Embassy of the People's Republic of China in the Federated States of Micronesia. (中华人民共和国驻密克罗尼西亚联邦大使馆). Jan. 4, 2021. <http://fm.china-embassy.org/chn/xwdt/t1844219.htm>.
- "Sunken Indonesian submarine's life raft lifted with assistance of Chinese navy." Xinhua. May 18, 2021. http://www.xinhuanet.com/english/asiapacific/2021-05/18/c_139954065.htm.
- Sutton, H I. "Chinese Ships Seen Mapping Strategic Seabed in Indian Ocean." *Naval News*. Jan. 22, 2021. <https://www.navalnews.com/naval-news/2021/01/how-china-is-mapping-the-seabed-of-the-indian-ocean/>.
- . "Chinese Survey Ship Caught 'Running Dark' Give Clues to Underwater Drone Operations." *USNI News*. Jan. 16, 2021. <https://news.usni.org/2021/01/16/chinese-survey-ship-caught-running-dark-give-clues-to-underwater-drone-operations>.

———. “Two Chinese Survey Ships Are Probing a Strategic Section of the Indian Ocean.” USNI News. Mar. 23, 2021. <https://news.usni.org/2021/03/23/two-chinese-survey-ships-are-probing-a-strategic-section-of-the-indian-ocean>.

“Take a Picture, the Rest is All up to Editing! This American Image Company Did It.” [开局一张图，剩下全靠编！这个美国图像公司做到了]. China Daily. [微信公众号“中国日报” (ID : CHINADAILYWX)]. July 17, 2021. https://mp.weixin.qq.com/s?_biz=MzA3NTE5MzQzMA==&mid=2655790087&idx=3&sn=0abe8d2691564453fa8d358970b9f7d0&chksm=84ccc93eb3bb4028adcb0e3d5b5a99dce46f67e1b677e13a221ff8882d15efa71dac133a7284&scene=0&xtrack=1#rd.

Talabong, Rambo, and Sofia Tomacruz. “The Sinking of Gem-Ver.” Rappler. July 10, 2019. <https://specials.rappler.com/newsbreak/in-depth/234304-there-is-a-ship-about-hit-sinking-gem-ver-recto-bank-series-part-1/index.html>.

The Nature Conservancy. “Palau.” Marine Planning. Accessed Aug. 15, 2020. <https://marineplanning.org/projects/pacific-islands/palau/>.

The University of Rhode Island. “Ghana Sustainable Fisheries Management Project.” URI Coastal Resource Center. Accessed Sept. 9, 2021. http://www.crc.uri.edu/projects_page/sfmp/.

The Western and Central Pacific Fisheries Commission. “How WCPFC Enforces the Rules: Fact Sheet.” WCPFC. Accessed Aug. 13, 2021 <https://iwlearn.net/resolveuid/69a81d6e417d8b72b86c973241fe2945>.

“Thirty-six Chinese ships smuggling into Cambodia were cracked down on in Koh Rong.” នាវាដឹកជនជាតិចិន៦នាក់ លួចឆ្លងដែនចូលកម្ពុជាដោយខុសច្បាប់ ត្រូវសមត្ថកិច្ចបង្ក្រាបបាននៅក្រុងកោះរ៉ុង. Cambodia Police. July 26, 2021. <https://cambodiapolice.com.translate.goog/policekh/297249? x tr sl=km& x tr tl=en& x tr hl=en& x tr pto=nui.sc>.

“Thirty-Six Chinese Ships Smuggling into Cambodia Were Cracked Down on Koh Rong (Video Inside).” នាវាដឹកជនជាតិចិន៦នាក់ លួចឆ្លងដែនចូលកម្ពុជាដោយខុសច្បាប់ ត្រូវបានបង្ក្រាបនៅក្រុងកោះរ៉ុង Fresh News. July 26, 2021. <https://m-freshnewsasia.com.translate.goog/index.php/en/localnews/206606-2021-07-26-08-23-40.html? x tr sch=http& x tr sl=km& x tr tl=en& x tr hl=en& x tr pto=nui.sc>.

Tilstone, Gavin H., Silvia Pardo, Giorgio Dall’Olmo, Robert J.W. Brewin, Francesco Nencioli, David Dessailly, Ewa Kwiatkowska, Tania Casal, and Craig Donlon. “Performance of Ocean Colour Chlorophyll a Algorithms for Sentinel-3 OLCI, MODIS-Aqua and Suomi-VIIRS in Open-Ocean Waters of the Atlantic.” *Remote Sensing of Environment* 260 (2021). Science Direct. <https://www.sciencedirect.com/science/article/pii/S0034425721001620>.

Trent, Steve. “Opinion: False claims by some in the trawling industry are betraying Ghana and its fishing industry.” Daily Guide Network Ghana. Apr. 22, 2021. <https://dailyguidenetwork.com/opinion-false-claims-by-some-in-the-trawling-industry-are-betraying-ghana-and-its-fishing-industry/>

Tridacna gigas IUCN Red List of Threatened Species. International Union for Conservation of Nature and Natural Resources. 2004. Accessed Sept. 27, 2021. <https://www.iucnredlist.org/species/22137/9362283>.

- “Two Trawlers Arrested with Over One Ton of Rays and Fins in Gabon.” Sea Shepherd Global. Aug. 17, 2020. <https://www.seashepherdglobal.org/latest-news/two-trawlers-arrested-rays/>.
- “Typical Case of Maritime Radio Order Rectification.” 水上无线电秩序整治典型案例. *The Paper*. 澎湃. June 23, 2020. https://www.thepaper.cn/newsDetail_forward_7969619.
- U.S. Coast Guard. “How Does AIS Compare and Contrast with VMS?” U.S. Coast Guard Navigation Center. Accessed Oct. 1, 2021. https://www.navcen.uscg.gov/pdf/AIS/Q_AIS_vs_VMS_Comparison.pdf.
- U.S. Department of Homeland Security. “Automatic Identification System Overview.” U.S. Coast Guard Navigation Center. Accessed Sept. 30, 2021. <https://www.navcen.uscg.gov/?pageName=aismain>.
- United Nations Convention of the Law of the Sea: Article 58: Rights and duties of other States in the exclusive economic zone; Article 62. Utilization of the living resources.* 1982. UN. https://www.un.org/depts/los/convention_agreements/texts/unclos/unclos_e.pdf.
- United Nations Convention on Law of the Sea Part II Territorial Sea and Contiguous Zone.* 1982. Accessed Sept. 22, 2021. https://www.un.org/depts/los/convention_agreements/texts/unclos/part2.htm.
- United Nations Convention on Law of the Sea Part V Exclusive Economic Zone* 1982. https://www.un.org/depts/los/convention_agreements/texts/unclos/part5.htm.
- Urbina, Ian. “Fish Farming Is Feeding the Globe. What’s the Cost for Locals?” *New Yorker*. Mar. 8, 2021. Accessed Aug. 19, 2021. <https://www.newyorker.com/magazine/2021/03/08/fish-farming-is-feeding-the-globe-whats-the-cost-for-locals>.
- “US Issues Withhold Release Orders to Chinese Companies Under the Pretext of 'Forced Labor'.” AS Keluarkan Withhold Release Order Kepada Perusahaan Tiongkok Dengan Dalih 'Kerja Paksa'. *CRI Indonesian*. May 30, 2021. <http://indonesian.cri.cn/20210530/2537d8b0-47ea-4138-6e1a-4b7262d5dd13.html>.
- “US Urged to Stop Spying in the South China Sea.” AS Digesa Hentikan Kegiatan Pengintipan di Laut China Selatan. *Malay CRI*. Dec. 18, 2016. <http://webcache.googleusercontent.com/search?q=cache:GPweZ83g1jcl:malay.cri.cn/601/2016/12/18/27s166433.htm+&cd=7&hl=en&ct=clnk&gl=us>.
- Vanuatu-China Friendship Association and Chinese Embassy in Vanuatu. “China-Vanuatu Poverty Alleviation Cooperation Contributes to Vanuatu’s Economic and Social Development.” *Daily Post Vanuatu*. May 10, 2021. <http://vu.china-embassy.org/eng/sxw/t1874512.htm>.
- “Vanuatu Detains Chinese Fishing Boats, Russian Yacht.” *Agence France Press*. Jan. 30, 2021. <https://www.france24.com/en/live-news/20210130-vanuatu-detains-chinese-fishing-boats-russian-yachtS>.
- “Vietnam Disrupts Chinese Company's Exploration of Xisha Islands, Illegal — Chinese Ambassador to Australia.” Panggugulo ng Biyetnam sa paggagalugad ng kompanyang Tsino sa Xisha Islands, ilegal—embahador Tsino sa Australia. *CRI Filipino*. June 12, 2014. <https://filipino-cri-cn.translate.goog/301/2014/06/12/103s129276.htm? x tr sch=http& x tr sl=tl& x tr tl=en& x tr hl=en-US& x tr pto=nui.op.sc>.

- “A Vietnamese Fishing Boat Sank While Harassing and Colliding with a Chinese Fishing Vessel in the Waters of China's Xisha Islands-The Fishermen on Board Were Rescued.” Một tàu cá Việt Nam bị chìm trong khi quấy nhiễu và đâm va tàu cá Trung Quốc tại vùng biển quần đảo Tây Sa Trung Quốc-Các ngư dân trên tàu đã được cứu. CRI Vietnamese. May 27, 2014. <http://vietnamese.cri.cn/421/2014/05/27/1s199175.htm>.
- Viray, Patricia Lourdes. “DFA Summons Chinese Envoy over Lingering Ships in West Philippine Sea.” *Philstar*. Apr. 13, 2021. <https://www.philstar.com/headlines/2021/04/13/2090826/dfa-summons-chinese-envoy-over-lingering-ships-west-philippine-sea>.
- Voytenko, Mikhail. “Fishing Wars in South Atlantic. Chinese vs. Brazilian.” *FleetMon*. Nov. 25, 2018. <https://www.fleetmon.com/maritime-news/2018/24369/fishing-wars-south-atlantic-chinese-vs-brazilian/>.
- “Water Quality from Space.” Brockmann Consult GmbH. Accessed Aug. 9, 2021. <https://www.brockmann-consult.de/portfolio/water-quality-from-space/>.
- WCPFC. “Conservation and Management Measure on Marine Pollution, CCM 2017-04.” Western & Central Pacific Fisheries Commission. Accessed July 16, 2021. <https://www.wcpfc.int/doc/cmm-2017-04/conservation-and-management-measure-marine-pollution>.
- Wenbin, Wang. “Foreign Ministry Spokesperson Wang Wenbin's Regular Press Conference on December 15, 2020.” Beijing, China, 2020. https://www.fmprc.gov.cn/mfa_eng/xwfw_665399/s2510_665401/t1840373.shtml.
- . “Foreign Ministry Spokesperson Wang Wenbin's Regular Press Conference on December 25, 2020.” Beijing, China, 2020. http://sb.chineseembassy.org/eng/fyrth_17/t1842734.htm.
- . Foreign Ministry Spokesperson Wang Wenbin's Regular Press Conference on May 31, 2021. Subject. <http://id.china-embassy.org/eng/fyrth/t1880105.htm>.
- “What is Eutrophication?” GEO Blue Planet. Accessed July 22, 2021. <https://chlorophyll-esriocceans.hub.arcgis.com/pages/eutrophication>.
- “What Vessels Are Required to Use AIS? What Are Global Regulations and Requirements for Vessels to Carry AIS?” Global Fishing Watch. Accessed Oct. 1, 2021. <https://globalfishingwatch.org/faqs/what-vessels-are-required-to-use-ais-what-are-global-regulations-and-requirements-for-vessels-to-carry-ais/>.
- White Paper on Compliance of China's Distant-Water Fishing (中国远洋渔业履约白皮书)*. Ministry of Agriculture and Rural Affairs. Nov. 2020. Accessed July 2021. http://www.moa.gov.cn/nybg/2020/202012/202102/t20210201_6360831.htm.
- Willie, Glenda. “The Chinese Embassy in Port Vila Did Not Respond to Requests for Comment.” *Daily Post Vanuatu*. Mar. 15, 2021. https://www.dailypost.vu/news/chinese-nationals-pi-next-week/article_7950988c-8517-11eb-a64d-af2fea32f071.html.
- . “Chinese Fishing Vessels Seized.” *Daily Post Vanuatu*. Jan. 22, 2021. https://www.dailypost.vu/news/chinese-fishing-vessels-seized/article_7f921a84-5c33-11eb-8c48-8b7b17bf15d2.html.
- Willie, Hilaire Bule and Glenda. “14 Plead Not Guilty.” *Daily Post Vanuatu*. May 19, 2021. https://www.dailypost.vu/news/14-plead-not-guilty/article_5d5df734-b82d-11eb-bc45-a38a2e0ce52e.html.
- “Xi Jinping Exchanges Congratulatory Messages with Namibian President Hage Geingob on the 30th Anniversary of the Establishment of China-Namibia Diplomatic Relations.”

- Ministry of Foreign Affairs of the People's Republic of China. Mar. 22, 2020. https://www.fmprc.gov.cn/mfa_eng/wjb_663304/zjzg_663340/fzs_663828/xwlb_663830/t1760172.shtml.
- Xinyi, Zhao. "Life in the Wake of Hainan's Clam Shell Clampdown." Sixth Tone. June 3, 2019. <https://www.sixthtone.com/news/1004054/life-in-the-wake-of-hainans-clam-shell-clampdown>.
- Yahya, Achmad Nasrudin. "Bakamla Suspects Chinese Survey Vessel Operates Underwater Sensors in Indonesian Waters." Bakamla Curiga Kapal Survei China Operasikan Sensor Bawah Air di Perairan Indonesia. *Nasional Kompas*. Nasional Kompas. Feb. 2, 2021. <https://nasional.kompas.com/read/2021/02/02/12144011/bakamla-curiga-kapal-survei-china-operasikan-sensor-bawah-air-di-perairan?page=all>.
- Yan, Zhang. "Crushing Cross-Border Trafficking." China Daily. Aug. 30, 2019. http://www.chinadaily.com.cn/global/2019-08/30/content_37506664.htm.
- Yingjie, Wang. "China-Indonesia Foreign Ministers Meeting, Timely and Pragmatic." [Pertemuan Menlu Tiongkok-Indonesia, Tepat Waktu dan Pragmatis]. CRI Bahasa Indonesia. Apr. 4, 2021. <http://indonesian.cri.cn/20210404/109bae8f-1696-e466-4261-a8ca231660c8.html>.
- Zambrano, Chiara. "EXCLUSIVE: Chinese harvesting giant clams in Scarborough Shoal." ABS CBN. Apr. 15, 2019. <https://news.abs-cbn.com/news/04/15/19/exclusive-chinese-harvesting-giant-clams-in-scarborough-shoal>.

Endnotes

- ¹ **NGO report examples:** Mary Utermohlen Duncan Copeland and Austin Brush, *Spotlight on the Exploitation of Company Structures by Illegal Fishing Operators*, Trygg Mat Tracking and C4ADS, 2020, https://static1.squarespace.com/static/566ef8b4d8af107232d5358a/t/5fd21567ce71ee580fb1cb72/1607603565040/TMT-C4ADS_Spotlight+on+Transparency.pdf; *Forced Labor at Sea: The Case of Indonesian Migrant Fishers*, Greenpeace with Serikat Buruh Migran Indonesia (SBMI), 2021, accessed Aug. 18, 2021, https://www.greenpeace.org/static/planet4-southeastasia-stateless/2021/05/ef65bfe1-greenpeace-2021-forced-labour-at-sea-digital_final.pdf; *China's Hidden Fleet in West Africa: A Spotlight on Illegal Practices Within Ghana's Industrial Trawl Sector*, Environmental Justice Foundation, 2018, accessed Aug. 13, 2021, <https://ejfoundation.org/reports/chinas-hidden-fleet-in-west-africa-a-spotlight-on-illegal-practices-within-ghanas-industrial-trawl-sector>. **Government report examples:** National Task Force for the West Philippine Sea, "Statement on the Presence of China's Maritime Militia at the West Philippine Sea," PTV News, Mar. 20, 2021, <https://ptvnews.ph/national-task-force-for-the-west-philippine-sea-statement-on-the-presence-of-chinas-maritime-militias-at-the-west-philippine-sea/>. *Illegal, Unreported and Unregulated Fishing Strategic Outlook*, United States Coast Guard, 2020, <https://www.uscg.mil/iuufishing/>. **Media report examples:** "Mauritania: 3 Fishermen Died After Their Boat Collided with a Chinese Ship, and the Matter Worsened," موريتانيا: هلاك 3 صيادين إثر اصطدام قاربهم، *El Hayat*, Oct. 10, 2020, https://www-elhayatonline-dz.translate.goog/%D9%85%D9%88%D8%B1%D9%8A%D8%AA%D8%A7%D9%86%D9%8A%D8%A7-%D9%87%D9%84%D8%A7%D9%83-3-%D8%B5%D9%8A%D8%A7%D8%AF%D9%8A%D9%86-%D8%A5%D8%AB%D8%B1-%D8%A5%D8%B5%D8%B7%D8%AF%D8%A7%D9%85-%D9%82%D8%A7%D8%B1%D8%A8/?_x_tr_sl=ar&_x_tr_tl=en&_x_tr_hl=en&_x_tr_pto=nui,sc; "Malaysia Seizes Six Illegal Chinese Fishing Vessels, Arrests 60 Men," *Business Standard*, Oct. 11, 2020, https://www.business-standard.com/article/international/malaysia-seizes-six-illegal-chinese-fishing-vessels-arrests-60-men-120101100054_1.html.
- ² Failure to ensure that a state's flag vessels respect the laws in the exclusive economic zones of other countries reflects violations of a state's duties under UNCLOS Articles 58 and 61.
- ³ Similarity, "Sewage from Anchored Ships Is Damaging Spratly Reefs," *South China Sea Rapid Alert Reports*, July 12, 2021, <https://similarity.com/july-2021-water-quality-in-spratleys-report/>.
- ⁴ Zandro Ochona, "More Chinese Ships May Be Dumping Wastes in Spratlys: Satellite Imagery Expert," *ABS CBN News*, July 15, 2021, <https://news.abs-cbn.com/news/07/15/21/similarity-report-china-ships-dumping-wastes-spratlys-july152021>.
- ⁵ Gavin H. Tilstone et al., "Performance of Ocean Colour Chlorophyll a Algorithms for Sentinel-3 OLCI, MODIS-Aqua and Suomi-VIIRS in Open-Ocean Waters of the Atlantic," *Remote Sensing of Environment* 260 (2021), Science Direct, <https://www.sciencedirect.com/science/article/pii/S0034425721001620>; "Water Quality from Space," Brockmann Consult GmbH, accessed Aug. 9, 2021, <https://www.brockmann-consult.de/portfolio/water-quality-from-space/>; NASA, "Chlorophyll a (chlor_a)," *Earth Data*, accessed Aug. 9, 2021, https://oceancolor.gsfc.nasa.gov/atbd/chlor_a/; "What is Eutrophication?," *GEO Blue Planet*, accessed July 22, 2021, <https://chlorophyll-esriocceans.hub.arcgis.com/pages/eutrophication>.
- ⁶ "Statement on the Presence of China's Maritime Militia at the West Philippine Sea."

⁷ Wang Yingjie, “China-Indonesia Foreign Ministers Meeting, Timely and Pragmatic,” [Pertemuan Menlu Tiongkok-Indonesia, Tepat Waktu dan Pragmatis], CRI Bahasa Indonesia, Apr. 4, 2021, <http://indonesian.cri.cn/20210404/109bae8f-1696-e466-4261-a8ca231660c8.html>.

⁸ Ibid.

⁹ Chinese Embassy Spokesperson Answers Question on a Report of Alleged Chinese Ships Dumping Waste in the South China Sea, Foreign Ministry of the People's Republic of China, “Foreign Ministry Spokesperson Zhao Lijian's Regular Press Conference on July 15, 2021,” July 15, 2021, https://www.fmprc.gov.cn/mfa_eng/xwfw_665399/s2510_665401/2511_665403/t1892361.shtml.

¹⁰ See, for example, a July 15, 2021 article published by *Global Times*, a widely read and influential non-authoritative subsidiary of the *People's Daily* with a strong nationalist bent, echoed the PRC MFA response, calling the report of PRC vessels dumping “fabricated and malicious.” “Chinese FM Condemns 'Fabricated, Malicious' Report of US Company Accusing Chinese Ships of Dumping Sewage in South China Sea,” *Global Times*, July 15, 2021,

<https://www.globaltimes.cn/page/202107/1228779.shtml>;

South China Sea Probing Initiative (SCSPI), “Twitter Thread about Similarity Report Funding,” Twitter, July 16, 2021, https://twitter.com/SCS_PI/status/1416223221834153984; South China Sea Probing Initiative (SCSPI), “Twitter Thread About Similarity Report Chlorophyll Analysis,” Twitter, July 15, 2021, https://twitter.com/SCS_PI/status/1415869066200248320;

People's Republic of China Embassy in the Philippines, “Chinese Embassy Spokesperson Answers Question on a Report of Alleged Chinese Ships Dumping Waste in the South China Sea,” July 16, 2021, <http://ph.china-embassy.org/eng/sgdt/t1892713.htm>;

“Take a Picture, the Rest is All up to Editing! This American Image Company Did It,” [开局一张图，剩下全靠编！这个美国图像公司做到了], China Daily, [微信公众号“中国日报” (ID: CHINADAILYWX)], July 17, 2021,

https://mp.weixin.qq.com/s?_biz=MzA3NTE5MzQzMA==&mid=2655790087&idx=3&sn=0abe8d2691564453fa8d358970b9f7d0&chksm=84ccc93eb3bb4028adcb0e3d5b5a99dce46f7e1b677e13a221ff8882d15efa71dac133a7284&scene=0&xtrack=1#rd.

¹¹ *International Convention for the Prevention of Pollution from Ships (MARPOL)*, (UN International Maritime Organization), accessed July 16, 2021,

[https://www.imo.org/en/About/Conventions/Pages/International-Convention-for-the-Prevention-of-Pollution-from-Ships-\(MARPOL\).aspx](https://www.imo.org/en/About/Conventions/Pages/International-Convention-for-the-Prevention-of-Pollution-from-Ships-(MARPOL).aspx). Continued dumping is also contrary to the various holdings in the Philippines v. China South China Sea Arbitration, PCA Case No. 2013-19. Decided 12 July 2016.

¹² Convention on the Prevention of Marine Pollution by Dumping of Wastes and Other Matter, see: “Map of Parties to the London Convention/Protocol,” UN International Maritime Organization, Feb. 22, 2019,

<https://wwwcdn.imo.org/localresources/en/OurWork/Environment/Documents/Parties%20to%20the%20LCLP%20February%202019.pdf>.

¹³ WCPFC, “Conservation and Management Measure on Marine Pollution, CCM 2017-04,” Western & Central Pacific Fisheries Commission, accessed July 16, 2021, <https://www.wcpfc.int/doc/cmm-2017-04/conservation-and-management-measure-marine-pollution>.

¹⁴ *De Lima Seeks Inquiry into the Dumping of Human Waste by Chinese Ships in the WPS*, Senate of the Philippines, 18th Congress, (July 17, 2021),

http://legacy.senate.gov.ph/press_release/2021/0717_delima2.asp.

¹⁵ Including laws, policies, regulations, and proposed regulations that prohibit the alleged activity within the PRC territorial waters and EEZ.

¹⁶ *Article 15, Regulations on the Prevention and Control of Ship Pollutants in the Marine Environment* [防治船舶污染海洋环境管理条例], State Council of the People's Republic of China, (2018),

http://www.gov.cn/gongbao/content/2014/content_2695225.htm.

¹⁷ *Discharge standard for water pollutants from ships* [船舶水污染物排放标准], PRC Ministry of Environmental and Ecology, (2016), https://www.american-club.com/files/files/MA_082818_PRC_Discharge_Standards_for_Water_Pollutants_from_Ships_p3.pdf.

-
- ¹⁸ Adam Somers, "US Embassy Commends ROP Government and Condemns Chinese IUU Fishing," *Island Times*, Dec. 22, 2020, <https://islandtimes.org/us-embassy-commends-rop-government-and-condemns-chinese-iuu-fishing/>.
- ¹⁹ Myrtle Hazard, "Palau and USCG Bust Chinese Vessel for Illegal Fishing," *Maritime Executive*, Dec. 24, 2020, <https://www.maritime-executive.com/article/palau-and-uscg-bust-chinese-vessel-for-illegal-fishing>.
- ²⁰ "Chinese Poachers Barred from Returning to Palau," *Island Times*, Jan. 15, 2021, <https://islandtimes.org/chinese-poachers-barred-from-returning-to-palau/>.
- ²¹ Adam Somers, "Chinese fishing boat stripped and escorted out of Palau," *Island Times*, Jan. 5, 2021, <https://islandtimes.org/chinese-fishing-boat-stripped-and-escorted-out-of-palau/>.
- ²² See, for example, "China vows harsher punishment for illegal pelagic fishing," *Xinhua*, Mar. 30, 2020, http://www.xinhuanet.com/english/2020-03/30/c_138930711.htm.; Alok Gupta, "China cracks down on illegal deep sea fishing," *CGTN*, Mar. 2, 2018, <https://news.cgtn.com/news/796b444f35677a6333566d54/index.html>.; "Amended Regulations on Administration of Distant Water Fishery Released by Ministry of Agriculture and Rural Affairs of the People's Republic of China," *Global Times*, Mar. 24, 2020, <https://www.globaltimes.cn/content/1183552.shtml>.
- ²³ Wang Wenbin, "Foreign Ministry Spokesperson Wang Wenbin's Regular Press Conference on December 15, 2020," (Beijing, China, Dec. 15, 2020), https://www.fmprc.gov.cn/mfa_eng/xwfw_665399/s2510_665401/t1840373.shtml.
- ²⁴ See, for example, "Foreign Ministry Spokesperson Wang Wenbin's Regular Press Conference on December 15, 2020," *China Daily*, Dec. 16, 2020, <https://govt.chinadaily.com.cn/s/202012/16/WS5fdac538498eaba5051bdbc1/foreign-ministry-spokesperson-wang-wenbins-regular-press-conference-on-december-15-2020.html>.; PRC MFA English-Chinese Weibo Account, "Regular Press Conference (2020-12-15)," 双语例行记者会, Weibo, Dec. 16, 2020, <https://weibo.com/ttarticle/p/show?id=2309404582715696480264>.; Wang Wenbin, "Foreign Ministry Spokesperson Wang Wenbin's Regular Press Conference on December 25, 2020," (Beijing, China, Dec. 25, 2020), http://sb.chineseembassy.org/eng/fyrth_17/t1842734.htm.
- ²⁵ During the Ministry's routine press conference on December 25, 2020, MFA Spokesperson Wang Wenbin was asked about a US report to Congress on PRC IUU fishing activities around the world. In response, Wang stated: "I would also like to point out that U.S. seiners far exceeded the number of days they are allowed to fish on the high seas according to relevant fishing management organization, and they have been doing this for many years. This has been a cause for concern among other members at the organization. Shouldn't the United States reflect upon its behavior and stop violating the rules?" See: Wenbin, "Foreign Ministry Spokesperson Wang Wenbin's Regular Press Conference on December 25, 2020."
- ²⁶ UNCLOS articles governing the utilization of resources within the exclusive economic zone of a coastal state, See: *United Nations Convention on Law of the Sea Part V Exclusive Economic Zone* (1982), https://www.un.org/depts/los/convention_agreements/texts/unclos/part5.htm.
- ²⁷ *Convention on Biological Diversity*, United Nations, (1992), CBD, <https://www.cbd.int/doc/legal/cbd-en.pdf>.
- ²⁸ *Palau National Code regarding foreign fishing, Division 1 of Title 27*, Palau National Code (PNC), (1990), accessed Aug. 15, 2021, ECOLEX, <http://extwprlegs1.fao.org/docs/pdf/pau36480.pdf>.
- ²⁹ The Nature Conservancy, "Palau," Marine Planning, accessed Aug. 15, 2020, <https://marineplanning.org/projects/pacific-islands/palau/>.
- ³⁰ Including laws, regulations, and proposed regulations that prohibit the alleged activity within the PRC territorial waters and EEZ.
- ³¹ *Distant Water Fishing Supervisory Provisions/Provisions for the Administration of Pelagic Fishery* [远洋渔业管理规定], Ministry of Agriculture, (Apr. 14, 2003), Law of China, http://www.pkulaw.cn/fulltext_form.aspx?Db=chl&Gid=45795.
- ³² *Fisheries Law of the People's Republic of China (2013 Amendment)* [Effective]

[中华人民共和国渔业法(2013 修正) [现行有效]], Ministry of Environment and Ecology, (Dec. 28, 2013), Law of China, <http://www.lawinfochina.com/display.aspx?id=18148&lib=law>.

³³ “DFW: 35 Indonesian Migrant Fishing Vessel Crew Die Abroad,” Destructive Fishing Watch, June 28, 2021, <https://dfw.or.id/35-indonesian-migrant/>; *Forced Labor at Sea: The Case of Indonesian Migrant Fishers*.

³⁴ “China Responds ‘Positively’ to Indonesian Request on Human Trafficking,” *Radio Free Asia*, Aug. 20, 2020, <https://www.rfa.org/english/news/china/responds-08202020190246.html>.

³⁵ “CBP Issues Withhold Release Order on Chinese Fishing Fleet,” U.S. Customs and Border Protection, May 28, 2021, <https://www.cbp.gov/newsroom/national-media-release/cbp-issues-withhold-release-order-chinese-fishing-fleet>.

³⁶ *Forced Labor at Sea: The Case of Indonesian Migrant Fishers*.

³⁷ “China Is a Responsible Fishing Country,” *Tiongkok Adalah Negara Perikanan Yang Bertanggung Jawab*, *CRI Indonesian*, Dec. 26, 2020, <http://indonesian.cri.cn/20201226/f3edcb1f-c4cf-af20-8f82-541a8329c810.html&prev=search&pto=aue>.

³⁸ For example, during a PRC embassy press conference in Jakarta, a Spokesperson of the Chinese Embassy to Indonesia answers reporters' question regarding deaths of Indonesian crew members aboard PRC fishing vessels. The Spokesperson's response at the time conveyed concern over the reported deaths and assurances of cooperation with Indonesian authorities regarding investigations. “Spokesperson of Chinese Embassy to Indonesia Answers Reporters' Question Regarding Indonesian Crew Members Who Passed Away on a Chinese Fishing Vessel and Relevant Issues [Juru Bicara Kedutaan Tiongkok untuk Indonesia kembali menjawab pertanyaan wartawan mengenai masalah yang melibatkan ABK WNI di sebuah kapal perikanan],” May 20, accessed Aug. 19, 2021, <http://id.china-embassy.org/indo/xwtd/t1780830.htm>.

³⁹ See, for example, Ma Jingjing, “US Mounts ‘Forced Labor’ Lies on Fishing Firm to Serve Strategy of Containing China Following Attack on Xinjiang Industries,” *Global Times*, May 29, 2021, <https://www.globaltimes.cn/page/202105/1224800.shtml>. Wang Wenbin, Foreign Ministry Spokesperson Wang Wenbin's Regular Press Conference on May 31, 2021, Subject, <http://id.china-embassy.org/eng/fyrth/t1880105.htm>; “China's Ministry of Foreign Affairs: Alleged Forced Labor Is a Conspiracy,” *Kemenlu Tiongkok: Tuduhan Kerja Paksa Sepenuhnya Adalah Rekayasa*, *CRI Indonesian*, June 1, 2021, <http://indonesian.cri.cn/20210601/9a26ce57-d145-8f4a-acce-c7b2a22fbc8a.html&prev=search&pto=aue>.

⁴⁰ “US Issues Withhold Release Orders to Chinese Companies Under the Pretext of ‘Forced Labor’,” AS Keluarkan Withhold Release Order Kepada Perusahaan Tiongkok Dengan Dalih ‘Kerja Paksa’, *CRI Indonesian*, May 30, 2021, <http://indonesian.cri.cn/20210530/2537d8b0-47ea-4138-6e1a-4b7262d5dd13.html>.

⁴¹ *C188 - Work in Fishing Convention, 2007 (No. 188)*, International Labour Organization, (2007), ILO, https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C188.

⁴² *C029 - Forced Labour Convention, 1930 (No. 29)*, International Labour Organization, (1930), ILO, https://www.ilo.org/dyn/normlex/en/f?p=1000:12100:0::NO::P12100_ILO_CODE:C029.

⁴³ *C105 - Abolition of Forced Labour Convention, 1957 (No. 105)*, International Labour Organization, (1957), ILO, https://www.ilo.org/dyn/normlex/en/f?p=1000:12100:0::NO::P12100_ILO_CODE:C105.

⁴⁴ “Intersessional Work on Improving Labour Standards for Crew on Fishing Vessels (2021),” Western & Central Pacific Fisheries Commission, Aug. 1, 2021, https://www.wcpfc.int/labour_standards.

⁴⁵ *Act of the Republic of Indonesia Number 13 Year 2003 Concerning Manpower*, State Gazette of the Republic of Indonesia, (2003), ILO-NATLEX, <https://www.ilo.org/dyn/travail/docs/760/Indonesian+Labour+Law+-+Act+13+of+2003.pdf>.

⁴⁶ Including laws, policies, regulations, and proposed regulations that prohibit the alleged activity within the PRC territorial waters and EEZ.

⁴⁷ *Notice of the Ministry of Agriculture, the Ministry of Foreign Affairs, the Ministry of Public Security, and the Ministry of Human Resources and Social Security on Continuing the Zhoushan, Zhejiang Pilot Work of Introducing Foreign Crews in the Ocean Fishing Industry [农业部 外交部 公安部 人力资源社会保障部*

关于继续在舟山市开展远洋捕捞行业引进外籍船员试点工作的通知, (Dec. 4, 2017), PRC Ministry of Agriculture, http://www.moa.gov.cn/nybgf/2014/derq/201712/t20171219_6104794.htm.

⁴⁸ Glenda Willie, “Chinese Fishing Vessels Seized,” *Daily Post Vanuatu*, Jan. 22, 2021, https://www.dailypost.vu/news/chinese-fishing-vessels-seized/article_7f921a84-5c33-11eb-8c48-8b7b17bf15d2.html.

⁴⁹ Dan McGarry, “Chinese Fishing Captains Face Jail, Big Fines for Alleged Illegal Fishing in Vanuatu,” *The Guardian*, Feb. 16, 2021, <https://www.theguardian.com/world/2021/feb/17/chinese-fishing-captains-face-jail-big-fines-for-alleged-fishing-in-vanuatu>.

⁵⁰ *Ibid.*

⁵¹ Hilaire Bule and Glenda Willie, “14 Plead Not Guilty,” *Daily Post Vanuatu*, May 19, 2021, https://www.dailypost.vu/news/14-plead-not-guilty/article_5d5df734-b82d-11eb-bc45-a38a2e0ce52e.html.

⁵² The third official language of Vanuatu is Bislama, a language in which PRC media does not produce content. For English and French examples of this narrative, see “China vows harsher punishment for illegal pelagic fishing.”; Gupta, “China cracks down on illegal deep sea fishing.”; “Amended Regulations on Administration of Distant Water Fishery Released by Ministry of Agriculture and Rural Affairs of the People’s Republic of China.”; “China investigates detention of Chinese boat in Ecuador for illegal fishing [La Chine enquête sur la détention d’un bateau chinois en Equateur pour pêche illégale],” *People’s Daily French Edition*, Aug. 3, 2017, <http://french.peopledaily.com.cn/Chine/n3/2017/0830/c31354-9262009.html>; “More than ten whales visible in southern China [Plus de dix baleines visibles dans le sud de la Chine],” *Xinhua French*, Mar. 30, 2018, http://french.xinhuanet.com/2018-03/30/c_137077920.htm.

⁵³ See, for example, Glenda Willie, “The Chinese Embassy in Port Vila Did Not Respond to Requests for Comment,” *Daily Post Vanuatu*, Mar. 15, 2021, https://www.dailypost.vu/news/chinese-nationals-pi-next-week/article_7950988c-8517-11eb-a64d-af2fea32f071.html; “Vanuatu Detains Chinese Fishing Boats, Russian Yacht,” Agence France Press, Jan. 30, 2021, <https://www.france24.com/en/live-news/20210130-vanuatu-detains-chinese-fishing-boats-russian-yachtS>.

⁵⁴ CNA did not observe any PRC media reporting on the incident in English or French—two official languages of Vanuatu.

⁵⁵ Hou Jianxin, “Foreign media: Vanuatu detains a Russian yacht and two Chinese fishing boats,” 外媒: 瓦努阿图扣留一艘俄游艇和两艘中国渔船, *Global Times 环球网*, Jan. 30, 2021, <https://world.huanqiu.com/article/41jCQrAoE56>.

⁵⁶ Vanuatu-China Friendship Association and Chinese Embassy in Vanuatu, “China-Vanuatu Poverty Alleviation Cooperation Contributes to Vanuatu’s Economic and Social Development,” *Daily Post Vanuatu*, May 10, 2021, <http://vu.china-embassy.org/eng/sgxw/t1874512.htm>.

⁵⁷ UNCLOS articles governing the utilization of resources within the exclusive economic zone of a coastal state, See: *UNCLOS Part V*, 1982.

⁵⁸ WCPFC article 5, which requires members to implement and enforce conservation and management, See: The Western and Central Pacific Fisheries Commission, “How WCPFC Enforces the Rules: Fact Sheet,” WCPFC, accessed Aug. 13, 2021 <https://iwlearn.net/resolveuid/69a81d6e417d8b72b86c973241fe2945>.

⁵⁹ Vanuatu Fisheries Act Part 14 Bans Driftnet Fishing, see: *Fisheries Act No. 10 of 2014, Part 14 - Ban on Driftnet Fishing*, Republic of Vanuatu, accessed Aug. 18, 2021, UN FAO, <http://extwprlegs1.fao.org/docs/pdf/van143413.pdf>.

⁶⁰ *Maritime Zones Act 2010, Part 4, Rights and jurisdiction of Vanuatu in its exclusive economic zone* Republic of Vanuatu, (2010), accessed Aug. 18, 2021, https://www.ffa.int/system/files/Maritime_Zones_Act_2010.pdf.

⁶¹ Including laws, policies, regulations, and proposed regulations that prohibit the alleged activity within the PRC territorial waters and EEZ.

⁶² *Distant Water Fishing Supervisory Provisions/Provisions for the Administration of Pelagic Fishery [远洋渔业管理规定]*, Apr. 14, 2003.

⁶³ *Fisheries Law of the People's Republic of China (2013 Amendment) [Effective]*

[中华人民共和国渔业法(2013 修正) [现行有效]], Dec. 28, 2013.

⁶⁴ "Two Trawlers Arrested with Over One Ton of Rays and Fins in Gabon," Sea Shepherd Global, Aug. 17, 2020, <https://www.seashepherdglobal.org/latest-news/two-trawlers-arrested-rays/>.

⁶⁵ *Fisheries and Aquaculture Code Law n 015 2005 [Code des pêches et de l'aquaculture Loi n°015/2005]*, Droit Afrique, (2005), accessed Aug. 26, 2021, <http://www.droit-afrique.com/upload/doc/gabon/Gabon-Code-2005-peche-aquaculture.pdf>;

Stevie Mounombou, "Illegal Fishing: Two Trawlers in the Nets of Operation Albacore," *Pêche illicite: Deux chalutiers dans les filets de l'opération Albacore*, *Gabon Review*, Aug. 20, 2020, <https://www.gabonreview.com/peche-illicite-deux-chalutiers-dans-les-filets-de-l-operation-albacore/>.

⁶⁶ Trevor Phillips-Levine, Dylan Phillips-Levine, and Walker Mills, "Leveraging NGOs and Volunteerism for Maritime Surveillance Against IUU Fishing," CIMSEC, Oct. 20, 2020, <https://cimsec.org/category/ocean-governance/>.

⁶⁷ "Gabon Cracks Down on Illegal Trawlers," Livestock and Fisheries Chamber, 2020, accessed Aug. 27, 2021, <https://livestockandfisherieschamber.com/gabon-cracks-down-on-illegal-trawlers/>.

⁶⁸ "Chinese trawler caught illegal fishing in protected waters of Loango National Park," Un chalutier chinois pris en flagrant délit de pêche illégale dans les eaux protégées du parc national de Loango, Direct Info Gabon, Aug. 18, 2019, <https://directinfosgabon.com/un-chalutier-chinois-pris-en-flagrant-delit-de-peche-illegale-dans-les-eaux-protégees-du-parc-national-de-loango/>.

⁶⁹ See, for example, "China urges US to protect global environment and stop stoking problems (spokesman) [French]," La Chine exhorte les États-Unis à protéger l'environnement mondial et à cesser d'attiser les problèmes (porte-parole), *Xinhua French*, Oct. 10, 2020, http://french.xinhuanet.com/2020-10/10/c_139429738.htm; "China leads operations against illegal fishing in the Yangtze River [French]," La Chine mène des opérations contre la pêche illégale dans le fleuve Yangtsé, *Xinhua French*, Aug. 10, 2020, http://french.xinhuanet.com/2020-08/10/c_139279867.htm; "China investigates detention of Chinese boat in Ecuador for illegal fishing [French]," La Chine enquête sur la détention d'un bateau chinois en Equateur pour pêche illégale, *People's Daily French*, Aug. 30, 2017, <http://french.people.com.cn/Chine/n3/2017/0830/c31354-9262009.html>.

⁷⁰ "China supports Gabon in its development, according to CEO's SG," La Chine accompagne le Gabon dans son développement, selon le SG du PDG, *Xinhua French*, Jan. 1, 2020, http://french.xinhuanet.com/2020-01/01/c_138671316.htm.

⁷¹ "China Strengthens Fisheries Cooperation with African Countries Under "Belt and Road"," *Xinhua French*, Sept. 9, 2018, http://french.xinhuanet.com/afrique/2018-09/04/c_137443911.htm.

⁷² "Chinese Ambassador HU Changchun met with Gabonese Minister of Foreign Affairs Pacôme MOUBELET BOUBEYA," L'Ambassadeur de Chine HU Changchun s'est entretenu avec le Ministre gabonais des Affaires Etrangères Pacôme MOUBELET BOUBEYA, PRC Embassy in Gabon, Ambassade de la République Populaire de Chine en République Gabonaise Oct. 5, 2020, <http://ga.china-embassy.org/fra/zxxx/t1821944.htm>; "Ambassador Hu Changchun to Gabon accepts an exclusive interview with Gabon 24 TV and other media on the theme of the 71st National Day" 驻加蓬大使胡长春以国庆 71 周年为主题接受加蓬 24 电视台等媒体专访, PRC Embassy in Gabon, 中华人民共和国驻加蓬共和国大使馆, Sept. 29, 2020, <http://ga.china-embassy.org/chn/zxxx/t1819676.htm>.

⁷³ UNCLOS articles governing the utilization of resources within the exclusive economic zone of a coastal state, See: *UNCLOS Part V*, 1982.

⁷⁴ *Convention on Biological Diversity*, 1992.

⁷⁵ COREP Article 3 outlines convention objectives and legal framework prohibiting illegal fishing, see: "Convention Relative to Regional Fisheries Development in the Gulf of Guinea," *Convention Relative Au Developpement Regional Des Peches Dans Le Golfe De Guinee*, UN Food and Agriculture Organization, accessed Aug. 27, 2021, http://www.fao.org/fishery/docs/DOCUMENT/corep/convention_f.pdf.

⁷⁶ Title 4 Ch. 3 Part 1 outlines types of infractions, including taking protected species see: *Gabon Fisheries and Aquaculture Law (2005 No. 015) Title 4 Chapter 3 - Repression of Offenses, Section 1 -*

Offenses [Titre 4, Chapitre 3 - De la Répression des Infractions, Section 1 - Des infractions], (2005), Droit-Afrique, <http://extwprlegs1.fao.org/docs/pdf/gab65652.pdf>.

⁷⁷ Including laws, policies, regulations, and proposed regulations that prohibit the alleged activity within the PRC territorial waters and EEZ.

⁷⁸ *Distant Water Fishing Supervisory Provisions/Provisions for the Administration of Pelagic Fishery* [远洋渔业管理规定], Apr. 14, 2003.

⁷⁹ *Fisheries Law of the People's Republic of China (2013 Amendment) [Effective]* [中华人民共和国渔业法(2013 修正) [现行有效]], Dec. 28, 2013.

⁸⁰ E.F. Smalls Jr., "The Gambia: Chinese Fishmeal Company Burnt Down by Angry Protesters," Eye Gambia, Mar. 15, 2021, <https://eyegambia.org/the-gambia-chinese-fishmeal-company-burnt-down-by-angry-protesters/>; Geraldine Boechat, "Alleged Chinese Factory Pollution Kills Dolphin in Gambia," *MedAfrica Times*, May 14, 2018, accessed Aug. 19, 2021, <https://medafricatimes.com/15852-alleged-chinese-factory-pollution-kills-dolphin-in-gambia.html>. Lily Kuo, "Gambians Are Accusing a Chinese Company of Destroying Their Coastline," *Quartz*, May 29, 2017, accessed Aug. 19, 2021 <https://qz.com/africa/993840/gambians-and-environmentalists-are-accusing-chinese-company-golden-leaf-of-destroying-their-coastline/>.

⁸¹ See, for example, Musa Keita, "Gunjur – Court Orders Stay on Chinese Golden Lead Fish-Meal Expansion Spree," *Chronicle Gambia*, June 17, 2021, <https://www.chronicle.gm/gunjur-court-orders-stay-on-chinese-golden-lead-fish-meal-expansion-spree/>. Mustapha K Daboe, "Gambians protest alleged pollution from Chinese plant," *Anadolu Agency*, Mar. 22, 2018, accessed Aug. 19, 2021, <https://www.aa.com.tr/en/africa/gambians-protest-alleged-pollution-from-chinese-plant/1096560#>. Ian Urbina, "Fish Farming Is Feeding the Globe. What's the Cost for Locals?," *New Yorker*, Mar. 8, 2021, accessed Aug. 19, 2021 <https://www.newyorker.com/magazine/2021/03/08/fish-farming-is-feeding-the-globe-whats-the-cost-for-locals>.

⁸² Urbina, "Fish Farming Is Feeding the Globe. What's the Cost for Locals?"; Louise Hunt, "Growing Tension over Illegal Fishing and Pollution in The Gambia," *Now This*, May 6, 2021, accessed Aug. 19, 2021, <https://nowthisnews.com/earth/growing-tension-over-illegal-fishing-and-pollution-in-the-gambia>.

⁸³ Hunt, "Growing Tension over Illegal Fishing and Pollution in The Gambia." Boechat, "Alleged Chinese Factory Pollution Kills Dolphin in Gambia."

⁸⁴ Urbina, "Fish Farming Is Feeding the Globe. What's the Cost for Locals?"; Matthew Green, "Ocean Shock: Fishmeal Factories Plunder Africa," *Reuters*, Oct. 30, 2018, accessed Aug. 19, 2021 <https://www.reuters.com/article/us-oceans-tide-sardinella-specialreport-idUSKCN1N420W>.

⁸⁵ National Environmental Agency Gambia, STOP NOTICE, Subject: Golden Lead Import & Export Co. Ltd., Mar. 10, 2021, https://drive.google.com/file/d/19J3vcNCLZH6v_pYG4egwkIGT6RAumUd/view. "Gunjur – Court Orders Stay on Chinese Golden Lead Fish-Meal Expansion Spree."; Mikaila Issa, "A Good Day for People and for the Ocean: Greenpeace Lauds Gambia's Government for Stopping the Expansion of Major Fishmeal and Fish Oil Plant," *Greenpeace*, Apr. 6, 2021, <https://www.greenpeace.org/africa/en/press/13437/a-good-day-for-people-and-for-the-ocean-greenpeace-lauds-gambias-government-for-stopping-the-expansion-of-major-fishmeal-and-fish-oil-plant/>.

⁸⁶ "Gunjur – Court Orders Stay on Chinese Golden Lead Fish-Meal Expansion Spree."

⁸⁷ According to Gambian media reports, protesters in the Gambia burnt down the Nassim Fishmeal factory following the alleged murder of a Gambian by a Senegalese employee of the PRC-owned Nassim factory as well as growing public criticism for the plant's disregard for safe and environmental industrial operation, especially in regard to waste disposal. See: "The Gambia: Chinese Fishmeal Company Burnt Down by Angry Protesters."; Efua Konyim Okai, "Gambians Torch Chinese Fishmeal Plant," *The Fish Site*, Mar. 25, 2021, accessed Aug. 9, 2021, <https://thefishsite.com/articles/gambians-torch-chinese-fishmeal-plant>.

⁸⁸ PRC Embassy in Gambia Spokesperson, "Discussions on the Burnt-Down Sanyang Fishmeal Factory Should Be Constructive," *People's Republic of China Embassy in Gambia*, Apr. 14, 2021,

<http://gm.china-embassy.org/eng/sgxw/t1868724.htm>. Mark Godfrey, “China Moves Forward with Investments in Gambia, Despite Protests,” SeafoodSource, July 3, 2019, accessed Aug. 19, 2021, <https://www.seafoodsource.com/news/supply-trade/china-moves-forward-with-investments-in-gambia-despite-protests>.

⁸⁹ Alagie Manneh, “China condemns assault on Sanyang fishmeal factory,” Standard Gambia, Mar. 25, 2021, <https://standard.gm/china-condemns-assault-on-sanyang-fishmeal-factory0/>. “The Gambia: Chinese Fishmeal Company Burnt Down by Angry Protesters.”; “Discussions on the Burnt-Down Sanyang Fishmeal Factory Should Be Constructive.”

⁹⁰ “Discussions on the Burnt-Down Sanyang Fishmeal Factory Should Be Constructive.”

⁹¹ “China condemns assault on Sanyang fishmeal factory.”; “The Gambia: Chinese Fishmeal Company Burnt Down by Angry Protesters.”

⁹² “China pledges cooperation with Gambia in several areas,” CGTN, Dec. 22, 2017, https://news.cgtn.com/news/7955544e33637a6333566d54/share_p.html.

⁹³ “Map of Parties to the London Convention/Protocol.”

⁹⁴ UNCLOS Part XII, Protection and Preservation of the Marine Environment, Article 194.

https://www.un.org/depts/los/convention_agreements/texts/unclos/part12.htm

⁹⁵ National Environmental Agency Gambia, STOP NOTICE, Mar. 10, 2021. “Gunjur – Court Orders Stay on Chinese Golden Lead Fish-Meal Expansion Spree.”

⁹⁶ The Gambia Fishery Act requires control of pollution, waste, discards, see: Patricia Lourdes Viray, “DFA Summons Chinese Envoy over Lingering Ships in West Philippine Sea,” *Philstar*, Apr. 13, 2021, <https://www.philstar.com/headlines/2021/04/13/2090826/dfa-summons-chinese-envoy-over-lingering-ships-west-philippine-sea>.

⁹⁷ Including laws, policies, regulations, and proposed regulations that prohibit the alleged activity within the PRC territorial waters and EEZ.

⁹⁸ PRC Fisheries Law, Article 36 regarding the protection of fishery waters and prevention of pollution, see: *Fisheries Law of the People's Republic of China (PRC Presidential Order No. 34 of 1986)*, Database of Laws and Regulations, National People's Congress, (1986), accessed Aug. 19, 2021, http://www.ilo.org/dyn/natlex/natlex4.detail?p_lang=en&p_isn=37829&p_country=CHN&p_count=1183&p_classification=19&p_classcount=3.

⁹⁹ *Marine Environmental Protection Law of the People's Republic of China [中华人民共和国海洋环境保护法]*, Ministry of Environment and Ecology, (2017),

https://www.mee.gov.cn/ywgz/fgbz/fl/201805/t20180517_440477.shtml.

¹⁰⁰ *At What Cost? How Ghana Is Losing Out on Fishing Arrangements with China's Distant Water Fleet*, Environmental Justice Foundation, 2021; Mona Samari, “Investigation Ties Foreign-Owned Trawlers to Illegal Fishing in Ghana,” *China Dialogue Ocean*, Sept. 12, 2019,

<https://chinadialogueocean.net/10050-investigation-illegal-fishing-in-ghana-pt-1/>.

¹⁰¹ *Fisheries Act: Act 625, 2002*, (June 30, 2003), <http://extwprlegs1.fao.org/docs/pdf/gha34737.pdf>.

For explanation of relevant legal issues see: Steve Trent, “Opinion: False claims by some in the trawling industry are betraying Ghana and its fishing industry,” *Daily Guide Network Ghana*, Apr. 22, 2021, <https://dailyguidenetwork.com/opinion-false-claims-by-some-in-the-trawling-industry-are-betraying-ghana-and-its-fishing-industry/>

¹⁰² See, for example, Mona Samari, *How Ghana's Weak Penalties Are Letting Trawlers Off the Hook*, *China Dialogue Ocean*, doi: Oct. 3, 2019, <https://chinadialogueocean.net/10522-ghana-weak-penalties-let-trawlers-off-the-hook/>; Karen McVeigh and Febriana Firdaus, “‘Hold on, brother’: the final days of the doomed crew on the Long Xing 629,” *The Guardian*, July 7, 2020,

<https://www.theguardian.com/environment/2020/jul/07/hold-on-brother-final-days-of-doomed-crew-on-chinese-shark-finning-boat>; Sadie Brown, “Report: Chinese Fishing Companies Cheat Fishing License in Ghana,” *Organized Crime and Corruption Reporting Project*, Mar. 30, 2021, <https://www.occrp.org/en/daily/14133-report-chinese-fishing-companies-cheat-fishing-license-in-ghana>.

¹⁰³ *At What Cost? How Ghana Is Losing Out on Fishing Arrangements with China's Distant Water Fleet*.

¹⁰⁴ See, for example, “Government charged to protect Ghanaian nationals from abuse on foreign fishing vessels,” Ghana Web, July 30, 2021,

<https://www.ghanaweb.com/GhanaHomePage/NewsArchive/Government-charged-to-protect-Ghanaian-nationals-from-abuse-on-foreign-fishing-vessels-1320817>; Shem Oirere, “Foreign Trawler in Illegal Fishing Venture Nabbed in Ghana,” Seafood Source, Oct. 22, 2019, <https://www.seafoodsource.com/news/supply-trade/foreign-trawler-in-illegal-fishing-venture-nabbed-in-ghana>; EJF Staff, *Stolen at Sea: How Illegal 'Saiko' Fishing Is Fueling the Collapse of Ghana's Fisheries*, June 2019, https://ejfoundation.org/resources/downloads/Stolen-at-sea_06_2019.pdf; Karen McVeigh and Nancy Dzradosi, “The Vanishing: Ghana’s Defenders Face New Perils in Fight Against Overfishing,” The Guardian, Nov. 16, 2019 <https://www.theguardian.com/environment/2019/nov/16/ghana-fisheries-observer-vanishes>.

¹⁰⁵ Economic and Commercial Office of the Embassy in Ghana, “Counselor Gao Wenzhi Interviewed by the Special Issue of China-Africa Trade and Economic Cooperation in the International Business Daily,” Ministry of Commerce of the People’s Republic of China, Mar. 30, 2012, accessed Feb. 28, 2018, <http://www.mofcom.gov.cn/aarticle/i/dxfw/gzdz/201203/20120308044957.html> accessed via: *China's Hidden Fleet in West Africa: A Spotlight on Illegal Practices Within Ghana's Industrial Trawl Sector*.

¹⁰⁶ Ming Mei, “Interview: Ghanaian official applauds Chinese support for her community,” Xinhua, July 27, 2019, http://www.xinhuanet.com/english/2019-07/27/c_138263245.htm; “China-aided port to boost Ghana's fishing industry,” Xinhua, Oct. 28, 2020, http://www.xinhuanet.com/english/2020-10/28/c_139473658.htm.

¹⁰⁷ “H.E. Ambassador Shi Ting Wang Attends the Ground Breaking Ceremony of AXIM Fishing Port,” Embassy of People's Republic of China in the Republic of Ghana, Aug. 7, 2019, <http://gh.china-embassy.org/eng/sgxw/t1686978.htm>; “Chinese Ambassador to Ghana H.E. Shi Ting Wang Attends the Groundbreaking Ceremony of the China-aided Jamestown Fishing Port Complex In Ghana,” Embassy of People's Republic of China in the Republic of Ghana, Jan. 5, 2019, <http://gh.china-embassy.org/eng/zjgx/jmhzt/1627189.htm>.

¹⁰⁸ UNCLOS requirement that there be a “genuine link” between the flag state and the ship owners as well as regarding coastal states’ rights to govern licensing, conservation, and foreign ownership, see: *UNCLOS Part V*, 1982.

¹⁰⁹ Fisheries act provisions banning foreign beneficial ownership, see: *Fisheries Act: Act 625, 2002*, June 30, 2003.

¹¹⁰ Ghana suspended new license issuance to avoid overexploitation and instituted new IUU fishing punishments to combat illegal fishing, see: The University of Rhode Island, “Ghana Sustainable Fisheries Management Project,” URI Coastal Resource Center, accessed Sept. 9, 2021, http://www.crc.uri.edu/projects_page/sfmp/; MOFAD Ghana, “WARFP Ghana Project Overview,” Ministry of Fisheries and Aquaculture Development, Republic of Ghana, accessed Sept. 9, 2021, <https://www.mofad.gov.gh/projects/west-africa-regional-fisheries-programme/warfp-ghana-project-overview/>; “Ghana: Suspension of Licensing of New Fishing Vessels With Effect From 1st February, 2012,” Fisheries Committee for the West Central Gulf of Guinea, Feb. 3, 2012, <https://fcwc-fish.org/other-news/ghana-suspension-of-licensing-of-new-fishing-vessels-with-effect-from-1st-february-2012>.

¹¹¹ Including laws, policies, regulations, and proposed regulations that prohibit the alleged activity within the PRC territorial waters and EEZ.

¹¹² White paper calls for “Severely crack[ing] down on IUU fishery activities, strictly regulate fishery behavior, and promote the high-quality development of offshore fisheries,” see: *White Paper on Compliance of China's Distant-Water Fishing (中国远洋渔业履约白皮书)*, Ministry of Agriculture and Rural Affairs, (Nov. 2020), accessed July 2021, http://www.moa.gov.cn/nybg/2020/202012/202102/t20210201_6360831.htm.

¹¹³ See, for example, Joseph Sipalan, “Malaysia Detains 60 Chinese Nationals, 6 Vessels for Trespassing,” Reuters, Oct. 10, 2020, <https://www.reuters.com/article/us-malaysia-china-boats-idUSKBN26V0FX>;

“Malaysia Seizes Six Illegal Chinese Fishing Vessels, Arrests 60 Men.”; “Malaysia Detains 6 Chinese Fishing Boats, Dozens of Seamen in Waters off Johor,” South China Morning Post, Oct. 10, 2020, <https://www.scmp.com/news/asia/southeast-asia/article/3104991/malaysia-detains-6-chinese-fishing-boats-dozens-seamen>; Named, “Six Chinese fishing boats were detained in Johor waters ” Enam bot nelayan China ditahan masuk perairan Johor, MalaysiaKini, Oct. 11, 2020.

¹¹⁴ “Malaysia Detains 6 Chinese Fishing Boats, Dozens of Seamen in Waters off Johor.”; James Griffiths, “Malaysia detains Chinese vessels for trespassing in territorial waters,” CNN, Oct. 12, 2020, <https://www.cnn.com/2020/10/12/asia/malaysia-china-japan-sea-intl-hnk/index.html>.

¹¹⁵ See, for example, “Malaysia Detains 6 Chinese Fishing Boats, Dozens of Seamen in Waters off Johor.”; Nisha David, “Source: Malaysia Releases Crew of Chinese Boats it Detained for Trespassing,” Benar News, Oct. 22, 2020, <https://www.benarnews.org/english/news/malaysian/my-ch-boats-10222020180624.html>; “Malaysia Seizes Six Illegal Chinese Fishing Vessels, Arrests 60 Men.”

¹¹⁶ “Source: Malaysia Releases Crew of Chinese Boats it Detained for Trespassing.”

¹¹⁷ “China Urges Malaysia to Investigate Fishing Vessel Detention Case,” China Gesa Malaysia Siasat Kes Penahanan Kapal Nelayan, Malay CRI, Oct. 13, 2020, <http://malay.cri.cn/20201013/26a1b17c-e71a-469c-1eab-4ee65c6bc4eb.html>; “Malaysia Detained 60 Fishermen from 6 Chinese Fishing Boats? Chinese Embassy Response,” (马来西亚扣留中国 6 艘渔船 60 名渔民? 中国使馆回应), Global Times, (环球时报), Oct. 11, 2020, <https://world.huanqiu.com/article/40EumM0Hosn>; Li Dongyao and Cui Fandi, “China Attaches Great Importance to Malaysia’s Detention of 60 Chinese Nationals: Embassy,” Global Times, Oct. 11, 2020, <https://www.globaltimes.cn/content/1203077.shtml>; “China’s Embassy in Malaysia Seeks Protection for Legitimate Rights of Detained Chinese Sailors,” CGTN, Oct. 11, 2020, <https://news.cgtn.com/news/2020-10-11/Chinese-embassy-seeks-info-on-fishing-vessels-crew-held-in-Malaysia--UuNRyT70Io/index.html>; “Foreign Ministry Spokesperson Zhao Lijian’s Regular Press Conference on October 12, 2020,” Ministry of Foreign Affairs of the People’s Republic of China, Oct. 12, 2020, https://www.fmprc.gov.cn/mfa_eng/xwfw_665399/s2510_665401/t1823343.shtml.

¹¹⁸ “Source: Malaysia Releases Crew of Chinese Boats it Detained for Trespassing.”

¹¹⁹ “China Urges Malaysia to Investigate Fishing Vessel Detention Case.”; “Malaysia Detained 60 Fishermen from 6 Chinese Fishing Boats? Chinese Embassy Response.”; “China Attaches Great Importance to Malaysia’s Detention of 60 Chinese Nationals: Embassy.”; “China’s Embassy in Malaysia Seeks Protection for Legitimate Rights of Detained Chinese Sailors.”

¹²⁰ “China’s Embassy in Malaysia Seeks Protection for Legitimate Rights of Detained Chinese Sailors.”; “China Attaches Great Importance to Malaysia’s Detention of 60 Chinese Nationals: Embassy.”

¹²¹ UNCLOS articles regarding passage through and anchoring in territorial waters, see: *United Nations Convention on Law of the Sea Part II Territorial Sea and Contiguous Zone*, (1982), accessed Sept. 22, 2021, https://www.un.org/depts/los/convention_agreements/texts/unclos/part2.htm.

¹²² Ordinance section titled “Master to report arrival,” requiring foreign vessels to obtain approval from Malaysian authorities for anchoring in Malaysia’s territorial waters, see: *Malaysia Merchant Shipping Ordinance 1952 [Ord. 70/1952]*. (1952), accessed Sept. 21, 2021, International Labor Organization NATLEX, https://www.ilo.org/dyn/natlex/natlex4.detail?p_lang=&p_isn=89550.

¹²³ *Act 317: Fisheries Act 1985*, FAOLEX, (Nov. 1, 2012), accessed Sept. 21, 2021, Food and Agriculture Organization FAOLEX Database, <http://extwprlegs1.fao.org/docs/pdf/mal1869.pdf>.

¹²⁴ Including laws, policies, regulations, and proposed regulations that prohibit the alleged activity within the PRC territorial waters and EEZ.

¹²⁵ *White Paper on Compliance of China’s Distant-Water Fishing (中国远洋渔业履约白皮书)*, Nov. 2020.

¹²⁶ *Regulations on the protection of coral reefs and clams in Hainan Province (海南省珊瑚礁和砗磲保护规定)*, Qionghai, Hainan, China Government, (May 24, 2021), accessed Sept. 27, 2021, http://qionghai.hainan.gov.cn/zfxgkzl/bm/gongsj/gkml/202105/t20210524_2983261.html; *Philippine fisheries code Republic Act No. 8550*, Congress of the Philippines Tenth Congress, (Feb. 25, 1998), accessed Sept. 26, 2021, UN FAOLEX, <http://extwprlegs1.fao.org/docs/pdf/phi16098.pdf>; *Philippines’ Wildlife Protection Act Republic Act No. 9147*, Congress of the Philippines Eleventh

Congress, (July 30, 2001), accessed Sept. 26, 2021, Philippines Official Gazette, <https://www.officialgazette.gov.ph/2001/07/30/republic-act-no-9417/>; *Giant Clams Convention on International Trade in Endangered Species (CITES) – Vulnerable*, CITES, (1985), accessed Sept. 27, 2021, <https://cites.org/sites/default/files/eng/com/ac/22/E22-10-2-A8e.pdf>; *Tridacna gigas IUCN Red List of Threatened Species*, International Union for Conservation of Nature and Natural Resources, (2004), accessed Sept. 27, 2021, <https://www.iucnredlist.org/species/22137/9362283>.

¹²⁷ See, for example, “Filipino Scientists Seeded Giant Clams, Chinese Fishermen Stole Them,” ABS CBN, Apr. 26, 2019, <https://news.abs-cbn.com/video/news/04/26/19/filipino-scientists-seeded-giant-clams-chinese-fishermen-stole-them>; Zhao Xinyi, “Life in the Wake of Hainan’s Clam Shell Clampdown,” Sixth Tone, June 3, 2019, <https://www.sixthtone.com/news/1004054/life-in-the-wake-of-hainans-clam-shell-clampdown>.

¹²⁸ Jimbo Owen B. Gulle, “Sino Poachers Target Giant Clams in Palawan Waters,” Manila Standard, Apr. 15, 2021, <https://manilastandard.net/news/top-stories/351892/sino-poachers-target-giant-clams-in-palawan-waters.html>; Dona Z. Pazzibugan, Jhesset O. Enano, and Julie M. Aurelio, “PH Protests China’s Harvest of Giant Clams,” Global Nation, Apr. 17, 2019, <https://globalnation.inquirer.net/174536/ph-protests-chinas-harvest-of-giant-clams>.

¹²⁹ See, for example, “Harvesting Giant Clams Has Led to ‘Wanton Destruction’ of Scarborough Shoal: Expert,” ABS CBN, Apr. 17, 2019, <https://news.abs-cbn.com/spotlight/04/17/19/harvesting-giant-clams-has-led-to-wanton-destruction-of-scarborough-shoal-expert>; Sara Susanne D. Fabunan, “Sino Poachers Kill Coral Reefs,” Manila Standard, Sept. 24, 2016, <https://manilastandard.net/news/top-stories/216988/sino-poachers-kill-coral-reefs.html>; “PH Protests China’s Harvest of Giant Clams.”

¹³⁰ Dr. John McManus, *Massively Destructive Coral Reef Damage from Giant Clam Shell Digging in the South China Sea*, OpenChannels, 2019, <https://vimeo.com/342103171>; Chiara Zambrano, “EXCLUSIVE: Chinese harvesting giant clams in Scarborough Shoal,” ABS CBN, Apr. 15, 2019, <https://news.abs-cbn.com/news/04/15/19/exclusive-chinese-harvesting-giant-clams-in-scarborough-shoal>.

¹³¹ For example, in 2016, an MFA spokesperson said, “As owners of the [Spratly Islands], China cares about protecting the ecological environment of relevant islands, reefs and waters more than any other country, organization or people in the world.” See: “S. China Sea Corals on Brink of Extinction,” *Global Times*, May 24, 2016, <https://www.globaltimes.cn/content/984745.shtml>. See also, “China, a responsible fishing country,” Tsina, responsableng bansang pangisda, Filipino CRI, Dec. 26, 2020, https://filipino-cri-cn.translate.google.com/20201226/388f504f-c345-1ac3-543f-2afa372f12ed.html?_x_tr_sch=http&_x_tr_sl=tl&_x_tr_tl=en&_x_tr_hl=en&_x_tr_pto=nui,sc,elem; “China’s ocean fishing plunders regional resources? Hua Chunying: China urges the US not to sow discord with the world,” (中国远洋捕鱼掠夺地区资源? 华春莹: 中方敦促美方不要满世界挑拨离间), China News Network (中国新闻网), Dec. 3, 2020, <http://www.chinanews.com/gn/2020/12-03/9353552.shtml>; “Statement of the Spokesperson of the Chinese Embassy on the U.S.’s accusation of illegal, unreported, and unregulated ocean fishing,” (驻密使馆发言人关于美国指责我非法、未报告、无管制远洋捕鱼的表态), Embassy of the People’s Republic of China in the Federated States of Micronesia, (中华人民共和国驻密克罗尼西亚联邦大使馆), Jan. 4, 2021, <http://fm.china-embassy.org/chn/xwtd/t1844219.htm>.

¹³² The PRC Embassy’s sole press release in reference to giant clams is the claim that Chinese fishermen of the Song dynasties harvested giant clams in the Spratly islands, and this long history of giant clam harvesting supports China’s claim of sovereignty over the region today. See: “The Productive Livelihood on the South China Sea in Chinese History,” Embassy of the People’s Republic of China in the Republic of the Philippines, May 25, 2016, <http://ph.china-embassy.org/eng/zt/nhwt/t1366336.htm>.

¹³³ One English report from the state-run, nationalist-leaning *Global Times* newspaper blamed “Mistaken government support for and promotion of the giant clam industry in Tanmen, Hainan Province” for “excessive exploitation” and “destruction of coral reef ecosystems.” See: “S. China Sea Corals on Brink of Extinction.” Another English report acknowledged that the “considerable economic

opportunities” the giant clam shell trade entailed led to “unsustainable fishing methods that have not only led to a rapid decline in the number of giant clams in the South China Sea, but have also seriously damaged the coral reef ecosystem.” See: “Giant Clams Still on Sale in South China Despite Bans,” *Global Times*, Apr. 25, 2019, <https://www.globaltimes.cn/content/1147431.shtml>. For other examples, see, “Shenzhen Authorities Intercept Clam Shell Products,” *China Daily*, Sept. 19, 2017, https://www.chinadaily.com.cn/china/2017-09/19/content_32198728.htm; “Over 300 Smuggled Endangered Species Items Seized in NE China,” *Xinhua*, May 19, 2019, http://www.xinhuanet.com/english/2019-05/19/c_138070724.htm.

¹³⁴ See, for example, “China and the Philippines, agreed to enhance bilateral relations and maintain dialogue on maritime issues,” *Tsina at Pilipinas, sumang-ayong pasulungin ang bilateral na relasyon at panatilihin ang diyalogo sa isyung pandagat*, *CRI Filipino*, May 22, 2021, https://filipino-cri-cn.translate.goog/20210522/a2f7772a-2b38-2dff-a7e3-b5914419f1d8-i.html?_x_tr_sch=http&_x_tr_sl=tl&_x_tr_tl=en&_x_tr_hl=en&_x_tr_pto=nui,sc,elem. “Chinese-Philippine fishing in the South China Sea, remains normal,” *Pangingisda ng Tsina’t Pilipinas sa South China Sea, nananatiling normal*, *Filipino CRI*, Feb. 13, 2019, https://filipino-cri-cn.translate.goog/301/2019/02/13/103s160771.htm?_x_tr_sch=http&_x_tr_sl=tl&_x_tr_tl=en&_x_tr_hl=en&_x_tr_pto=nui,sc,elem; “Statement from the Filipino side, with a political purpose,” [Pahayag mula sa panig Pilipino, may layuning pampulitika], *Filipino CRI*, Jan. 20, 2016, https://filipino-cri-cn.translate.goog/301/2016/01/20/2s141349.htm?_x_tr_sch=http&_x_tr_sl=tl&_x_tr_tl=en&_x_tr_hl=en&_x_tr_pto=nui,sc,elem; “It Is Better to Advance the Fisheries Agreement with China,” *Mas magandang isulong ang Fisheries Agreement sa Tsina*, *Filipino CRI*, Nov. 17, 2017, https://filipino-cri-cn.translate.goog/301/2017/11/17/109s152848.htm?_x_tr_sch=http&_x_tr_sl=tl&_x_tr_tl=en&_x_tr_hl=en&_x_tr_pto=nui,sc,elem; “China: Philippine construction of school on Thitu Island, illegal,” *Tsina: Pagtatayo ng Pilipinas ng eskuwelahan sa Thitu Island, iligal*, *CRI Filipino*, June 26, 2012, https://filipino-cri-cn.translate.goog/301/2012/06/26/2s111441.htm?_x_tr_sch=http&_x_tr_sl=tl&_x_tr_tl=en&_x_tr_hl=en&_x_tr_pto=nui,sc,elem; “China opposes the Philippines’ construction and deployment of weapons on Thitu Island,” *Tsina, tutol sa pagtatayo at pagdedeploy ng Pilipinas ng mga sandata sa Thitu Island*, *CRI Filipino*, Jan. 19, 2016, https://filipino-cri-cn.translate.goog/301/2016/01/19/102s141341.htm?_x_tr_sl=tl&_x_tr_tl=en&_x_tr_hl=en&_x_tr_pto=nui,sc,elem&_x_tr_sch=http.

¹³⁵ CITES classifies giant clams as vulnerable, see: *Giant Clams Convention on International Trade in Endangered Species (CITES) – Vulnerable*, 1985.

¹³⁶ *United Nations Convention of the Law of the Sea: Article 58: Rights and duties of other States in the exclusive economic zone; Article 62. Utilization of the living resources*, (1982), UN, https://www.un.org/depts/los/convention_agreements/texts/unclos/unclos_e.pdf.

¹³⁷ *Convention on Biological Diversity*, 1992.

¹³⁸ Philippines fisheries code prohibits taking threatened or endangered species, see: *Philippine fisheries code Republic Act No. 8550*, Feb. 25, 1998.

¹³⁹ Philippines Wildlife Protection Act penalizes killing endangered species, see: *Philippines’ Wildlife Protection Act Republic Act No. 9147*, July 30, 2001.

¹⁴⁰ Including laws, policies, regulations, and proposed regulations that prohibit the alleged activity within the PRC territorial waters and EEZ.

¹⁴¹ According to the PRC government, Hainan Province has jurisdiction to enact regulations over nearly all waters in the South China Sea, including the contested waters in this case study. Article 10 prohibits excavating, harvesting, or killing giant clams, see: *Regulations on the protection of coral reefs and clams in Hainan Province (海南省珊瑚礁和砗磲保护规定)*, May 24, 2021.

¹⁴² See: Dian Septiari and Novan Iman Santosa, “Bakamla Intercepts Chinese Research Vessel in Sunda Strait,” *The Jakarta Post*, Jan. 17, 2021, <https://www.thejakartapost.com/news/2021/01/16/bakamla-intercepts-chinese-research-vessel-in-sunda-strait.html>; Achmad Nasrudin Yahya, “Bakamla Suspects Chinese Survey Vessel Operates Underwater Sensors in Indonesian Waters,” *Bakamla Curiga Kapal*

Survei China Operasikan Sensor Bawah Air di Perairan Indonesia, *Nasional Kompas*, Nasional Kompas, Feb. 2, 2021, <https://nasional.kompas.com/read/2021/02/02/12144011/bakamla-curiga-kapal-survei-china-operasikan-sensor-bawah-air-di-perairan?page=all>; Valerie Mai, "The Indonesian Patrol Vessel Blocked the Chinese Research Vessel in Sunda Strait," *Vietnam Times*, Jan. 20, 2021, <https://vietnamtimes.org.vn/the-indonesian-patrol-vessel-blocked-the-chinese-research-vessel-in-sunda-strait-27492.html>; Gloria Methri, "Chinese Research Vessel Intercepted in Indonesian Waters; Hints at Underwater Ops," *Republic World*, Jan. 17, 2021, <https://www.republicworld.com/world-news/china/chinese-research-vessel-intercepted-in-indonesian-waters-hints-at-underwater-ops.html>.

¹⁴³ "Chinese Research Vessel Intercepted in Indonesian Waters; Hints at Underwater Ops."; *Regulations for Carriage of AIS*, UN International Maritime Organization, (Dec. 31, 2004), accessed Sept. 20, 2021, <https://www.imo.org/en/OurWork/Safety/Pages/AIS.aspx>; *Indonesian Government Regulation No. 37 on the Rights and Obligations of Foreign Ships and Aircraft Exercising the Right of Archipelagic Sea Lane Passage Through Designated Archipelagic Sea Lanes*, 28 June 2002, National legislation - DOALOS/OLA - United Nations - INDONESIA, (June 28, 2020), accessed Sept. 20, 2021, https://www.un.org/Depts/los/doalos_publications/LOSBulletins/bulletinpdf/bulletin52e.pdf; "Chinese Research Vessel Intercepted in Indonesian Waters; Hints at Underwater Ops."

¹⁴⁴ Agustinus Beo Da Costa, "Indonesia Says Spots Chinese Research Vessel in Its Waters, Tracker Off," *Reuters*, Jan. 14, 2021, <https://www.reuters.com/article/us-indonesia-maritime-china/indonesia-says-spots-chinese-research-vessel-in-its-waters-tracker-off-idUSKBN29J11M>; Yahya, "Bakamla Suspects Chinese Survey Vessel Operates Underwater Sensors in Indonesian Waters."

¹⁴⁵ H I Sutton, "Chinese Survey Ship Caught 'Running Dark' Give Clues to Underwater Drone Operations," *USNI News*, Jan. 16, 2021, <https://news.usni.org/2021/01/16/chinese-survey-ship-caught-running-dark-give-clues-to-underwater-drone-operations>; H I Sutton, "Two Chinese Survey Ships Are Probing a Strategic Section of the Indian Ocean," *USNI News*, Mar. 23, 2021, <https://news.usni.org/2021/03/23/two-chinese-survey-ships-are-probing-a-strategic-section-of-the-indian-ocean>; H I Sutton, "Chinese Ships Seen Mapping Strategic Seabed in Indian Ocean," *Naval News*, Jan. 22, 2021, <https://www.navalnews.com/naval-news/2021/01/how-china-is-mapping-the-seabed-of-the-indian-ocean/>.

¹⁴⁶ See: *Indonesian Government Regulation No. 37 on the Rights and Obligations of Foreign Ships and Aircraft Exercising the Right of Archipelagic Sea Lane Passage Through Designated Archipelagic Sea Lanes*, 28 June 2002, June 28, 2020; *Act No. 6 of 8 August 1996 regarding Indonesian Waters, Third Part, Transit Crossing Rights, Article 20*, National legislation - DOALOS/OLA - United Nations - INDONESIA, (Aug. 8, 1996), accessed Sept. 20, 2021, https://www.un.org/depts/los/LEGISLATIONANDTREATIES/PDFFILES/IDN_1996_Act.pdf; "Indonesia Says Spots Chinese Research Vessel in Its Waters, Tracker Off."

¹⁴⁷ "Embassy News," *Aktivitas Kedubes*, Embassy of the People's Republic of China in the Republic of Indonesia, 2021, accessed Sept. 20, 2021, <http://id.china-embassy.org/indo/sgdt/>; "Indonesia Says Spots Chinese Research Vessel in Its Waters, Tracker Off."; Mai, "The Indonesian Patrol Vessel Blocked the Chinese Research Vessel in Sunda Strait."

¹⁴⁸ See, for example, "Chinese Ministry of Foreign Affairs Denies Pompeo's 'Worried and Concerned' Statement on Chinese Fishing Vessel Operations on the High Seas," *Kemlu Tiongkok Bantah Pernyataan Pompeo Yang 'Prihatin dan Khawatir' pada Operasi Kapal Nelayan Tiongkok di Laut Lepas*, Indonesian CRI, Sept. 11, 2020, <http://indonesian.cri.cn/20200911/35f2e69f-b8db-afb1-7ae3-14763f12a8c8.html>; "China Is a Responsible Fishing Country."; "Foreign Ministry Spokesperson Zhao Lijian's ", *China Daily Government*, Sept. 10, 2020, <https://govt.chinadaily.com.cn/s/202009/10/WS5f5e046c498ed1e2f34093c7/foreign-ministry-spokesperson-zhao-lijians-regular-press-conference-on-september-10-2020.html>.

¹⁴⁹ "US Urged to Stop Spying in the South China Sea," *AS Digesa Hentikan Kegiatan Pengintipan di Laut China Selatan*, Malay CRI, Dec. 18, 2016, <http://webcache.googleusercontent.com/search?q=cache:GPweZ83g1jcj:malay.cri.cn/601/2016/12/18/27s166433.htm+&cd=7&hl=en&ct=clnk&gl=us>.

¹⁵⁰ See, for example, “Chinese Navy Assists in Appointment of KRI Nanggala-402, China-Indonesia Military Cooperation to a New Level,” AL Tiongkok Bantu Pengangkatan KRI Nanggala-402, Kerja Sama Militer Tiongkok-Indonesia Ke Level Baru, Indonesian CRI, May 4, 2021, <http://indonesian.cri.cn/20210504/3a4cc4a6-ebb9-5b5d-cf07-d0e1166d36d9.html>; “Indonesia Ends KRI Nanggala 402 Submarine Lifting Operation,” Indonesia Akhiri Operasi Pengangkatan Kapal Selam KRI Nanggala 402, Indonesian CRI, June 3, 2021, <http://indonesian.cri.cn/20210603/d326421e-f138-8ee8-906b-999eb8fbe624.html>; “Chinese navy helps lift sunken Indonesian submarine’s life raft,” CGTN, May 19, 2021, <https://news.cgtn.com/news/2021-05-19/Chinese-navy-helps-lift-sunken-Indonesian-submarine-s-life-raft--10oaQAUCgOk/index.html>; “Sunken Indonesian submarine’s life raft lifted with assistance of Chinese navy,” Xinhua, May 18, 2021, http://www.xinhuanet.com/english/asiapacific/2021-05/18/c_139954065.htm; “Chinese military sends vessels to assist Indonesia over sunken navy submarine,” CGTN, Mar. 19, 2021, <https://news.cgtn.com/news/2021-04-30/China-sends-vessels-to-assist-Indonesia-over-sunken-navy-submarine-ZT8r8Y3fi0/index.html>.

¹⁵¹ IMO Convention for the Safety Of Life At Sea (SOLAS) Regulation V/19.2.4 requires all vessels of 300 GT and above to carry active AIS. *International Convention for the Safety of Life at Sea (SOLAS), 1974*, International Maritime Organization, (1974), accessed Sept. 21, 2021, [https://www.imo.org/en/About/Conventions/Pages/International-Convention-for-the-Safety-of-Life-at-Sea-\(SOLAS\)-1974.aspx](https://www.imo.org/en/About/Conventions/Pages/International-Convention-for-the-Safety-of-Life-at-Sea-(SOLAS)-1974.aspx). *Regulations for Carriage of AIS*, Dec. 31, 2004.

¹⁵² UNCLOS provisions governing the exploration for resources and scientific surveys within the EEZ of a coastal state, see: *UNCLOS Part V*, 1982.

¹⁵³ Regulations on the Rights and Obligations of Foreign Ships and Aircraft Exercising the Right of Archipelagic Sea Lane Passage, see: *Indonesian Government Regulation No. 37 on the Rights and Obligations of Foreign Ships and Aircraft Exercising the Right of Archipelagic Sea Lane Passage Through Designated Archipelagic Sea Lanes*, 28 June 2002, June 28, 2020.

¹⁵⁴ *Act No. 6 of 8 August 1996 regarding Indonesian Waters, Third Part, Transit Crossing Rights, Article 20*, Aug. 8, 1996.

¹⁵⁵ Including laws, policies, regulations, and proposed regulations that prohibit the alleged activity within the PRC territorial waters and EEZ.

¹⁵⁶ *International Convention for the Safety of Life at Sea, 1974; China ratified May 25, 1980*, Secretary-General of the Intergovernmental Maritime Consultative Organization, (Jan. 11, 1974), accessed Sept. 21, 2021, <https://treaties.un.org/pages/showDetails.aspx?objid=08000002800ec37f>. Additionally, the 2020 PRC White Paper on China’s Offshore Fisheries Contract Performance notes that “All ocean-going fishing vessels must install and normally turn on the Vessel Position Monitoring System (VMS), and automatically report the position once an hour,” see: *White Paper on Compliance of China’s Distant-Water Fishing (中国远洋渔业履约白皮书)*, Nov. 2020.

¹⁵⁷ See, for example, “Fujian subsidies to the fishing sector bring trouble to West African waters,” الدعم الفوجياني لقطاع الصيد يجلب المتاعب لمياه غرب إفريقيا, Africa Defense Forum, Aug. 11, 2021, https://adf--magazine-com.translate.google.ar/2021/08/%D8%A7%D9%84%D8%AF%D8%B9%D9%85-%D8%A7%D9%84%D9%81%D9%88%D8%AC%D9%8A%D8%A7%D9%86%D9%8A-%D9%84%D9%82%D8%B7%D8%A7%D8%B9-%D8%A7%D9%84%D8%B5%D9%8A%D8%AF-%D9%8A%D8%AC%D9%84%D8%A8-%D8%A7%D9%84%D9%85%D8%AA/?_x_tr_sl=ar&_x_tr_tl=en&_x_tr_hl=en&_x_tr_pto=nui,sc.

Gitonga Njeru, “Chinese companies get go-ahead to operate in a range of industries in Mauritania”, Beijing Review, June 18, 2019,

http://www.bjreview.com/World/201906/t20190618_800171021.html; “Mauritania: 3 Fishermen Were Killed After Their Boat Collided with a Chinese Ship,” موريتانيا: هلاك 3 صيادين إثر اصطدام قاربهم بسفينة صينية, Skonic, Oct. 11, 2020,

<https://skonic.com/en/%D9%85%D9%88%D8%B1%D9%8A%D8%AA%D8%A7%D9%86%D9%8A%D8%A7-%D9%87%D9%84%D8%A7%D9%83-3-%D8%B5%D9%8A%D8%A7%D8%AF%D9%8A%D9%86-%D8%A5%D8%AB%D8%B1-%D8%A5>

%D8%B5%D8%B7%D8%AF%D8%A7%D9%85-%D9%82%D8%A7%D8%B1%D8%A8/#fwdmspPlayer0?catid=0&trackid=0.

¹⁵⁸ ADF Staff, “Mauritians Protest Chinese Fishing After Deadly Incident,” *الموريتانيون يحتجون على سفن الصيد الصينية عقب حادثة دموية*, Africa Defense Forum, Oct. 7, 2020, <https://adf-magazine.com/2020/10/mauritians-protest-chinese-fishing-after-deadly-incident/>.

¹⁵⁹ “Mauritania: 3 Fishermen Died After Their Boat Collided with a Chinese Ship, and the Matter Worsened.”; “Mauritania: 3 Fishermen Were Killed After Their Boat Collided with a Chinese Ship.”

¹⁶⁰ “Nouadhibou: A Chinese ship kills four Mauritanian fishermen,” *نواذيبو: باخرة صينية تتسبب في مقتل أربعة*, صيادين موريتانيين, El Hiyad, July 26, 2017, https://elhiyad-info.translate.google/node/4413?_x_tr_sch=http&_x_tr_sl=ar&_x_tr_tl=en&_x_tr_hl=en&_x_tr_pto=nui,s. As of October 2021, reporting on the outcome of cases brought against the PRC fishermen were not observed.

¹⁶¹ Of note, PRC official statements regarding Mauritania predominantly focus on the PRC’s provision of medical assistance to the country. See, for example, “The 50th Chinese Medical Cooperation to Aid Mauritania Speech by the Chinese Ambassador to Mauritania Zhang Jianguo at the reception on the occasion of the opening of the grand photo exhibition and the issuance of the commemorative stamp of the anniversary,” *الخمسين للتعاون الطبي الصيني لمساعدة موريتانيا كلمة سعادة السفير الصيني لدى موريتانيا تشانغ جيان قوه في حفل*, الاستقبال بمناسبة افتتاح معرض الصور الكبير وإصدار الطابع التذكاري للذكرى in the Islamic Republic of Mauritania, June 25, 2018, https://www-fmprc-gov-cn.translate.google/zalt/ara/yjzs/t1571325.htm?_x_tr_sl=ar&_x_tr_tl=en&_x_tr_hl=en&_x_tr_pto=nui,sc; “The Distinguished Force to Promote Sino-Mauritanian Friendly Cooperation,” *القوة المميزة لتعزيز التعاون*, الودي بين الصين وموريتانيا, Embassy of the People’s Republic of China in the Islamic Republic of Mauritania, June 20, 2018, https://www-fmprc-gov-cn.translate.google/ce/cemr/fra/xwtd/t1553589.htm?_x_tr_sl=ar&_x_tr_tl=en&_x_tr_hl=en&_x_tr_pto=nui,sc; “President Xi Jinping held talks with his Mauritanian counterpart, Mohamed Ould Abdel Aziz, and stressed efforts to be made jointly to give new impetus to Sino-Mauritanian friendly cooperation,” *اجرى الرئيس شي جينبينغ محادثات مع نظيره الموريتاني محمد ولد عبد العزيز واكد علي بذل جهود مشتركة لاضفاء قوة دافعة جديدة للتعاون الصيني*, Ministry of Foreign Affairs for the People’s Republic of China, Sept. 16, 2015, <https://www-fmprc-gov-cn.translate.google/zalt/ara/zajw/t1297216.htm>; “China ready to help bring long-term peace to Sahel region: envoy,” CGTN Africa, Nov. 17, 2020, <https://africa.cgtn.com/2020/11/17/china-ready-to-help-bring-long-term-peace-to-sahel-region-envoy/>.

¹⁶² See, for example, “APIM Director General receives Chinese Ambassador,” Mauritania News Agency, Aug. 7, 2021, <https://en.ami.mr/Depeche-1415.html>; “The 2017 China-Mauritania Joint Fisheries Committee meeting was held in Beijing,” 2017 年中国—毛里塔尼亚渔业混委会会议在京召开, Embassy of the People’s Republic of China in the Islamic Republic of Mauritania, Oct. 30, 2017, <http://mr.china-embassy.org/chn/sgzyhd/t1507981.htm>; “President Xi Jinping held talks with his Mauritanian counterpart, Mohamed Ould Abdel Aziz, and stressed efforts to be made jointly to give new impetus to Sino-Mauritanian friendly cooperation.”

¹⁶³ See, for example, “Ambassador Chen Gonglai accompanied President Mao to attend the completion ceremony of the Fujian Hongdong Fishery Company project,” *驻毛塔大使陈公来陪同毛总统出席福建宏东渔业公司项目竣工仪式*, Embassy of the People’s Republic of China in the Islamic Republic of Mauritania, Apr. 7, 2014, <http://mr.china-embassy.org/chn/jmwl/t1145897.htm>; “Chinese Ambassador to Mauritania Chen Gong came to meet with the Minister of Fisheries of Mauritania,” *中国驻毛塔大使陈公来会见毛渔业部长*, Embassy of the People’s Republic of China in the Islamic Republic of Mauritania, 2012, <http://mr.china-embassy.org/chn/xwtd/t816962.htm>; “Solidarity, synergy, cooperation and win-win warm congratulations on the 55th anniversary of the establishment of diplomatic relations between China and Mauritania, by Mr. Zhang Jianguo, Chinese Ambassador to Mauritania,” *التضامن والتآزر والتعاون والفوز المشترك كالتنهان الحارة بمناسبة الذكرى السنوية الـ 55 لإقامة العلاقات الدبلوماسية بين* الصين وموريتانيا, Embassy of the People’s Republic of China in the Islamic Republic of Mauritania, July 19, 2020, <https://www-fmprc-gov->

cn.translate.google.com/ce/cemr/fra/sbgx/t1798790.htm?_x_tr_sl=ar&_x_tr_tl=en&_x_tr_hl=en&_x_tr_pto=nui,sc.

¹⁶⁴ See, for example, “Interview: Chairman of the Ruling Party in Mauritania: The Chinese Communist Party Is Leading China to Achieve Unprecedented Development,” *مقابلة: رئيس الحزب الحاكم في موريتانيا: الحزب الشيوعي الصيني يقود الصين إلى تحقيق تنمية غير مسبوقة*, CRI Arabic, July 16, 2021, http://arabic.news.cn/2021-07/16/c_1310065216.htm; “The start of the “Covid-19” vaccination process in Mauritania,” *انطلاق عملية التطعيم بلقاح “كوفيد-19” في موريتانيا*, CGTN Arabic, Mar. 27, 2021, https://arabic-cgtn.com.translate.google.com/n/BfJEa-cA-GcA/FIeJEA/index.html?_x_tr_sl=ar&_x_tr_tl=en&_x_tr_hl=en&_x_tr_pto=nui,sc;

“The Second Batch of Chinese Medical Aid Delivered to Mauritania,” *تسليم الدفعة الثانية من المساعدات الطبية الصينية إلى موريتانيا*, CRI Arabic, Apr. 21, 2020, https://arabic-cri-cn.translate.google.com/news/china/438/20200421/456053.html?_x_tr_sch=http&_x_tr_sl=ar&_x_tr_tl=en&_x_tr_hl=en&_x_tr_pto=nui,sc.

¹⁶⁵ See, for example, “China to build industrial fishing port in Nouakchott,” *La Chine va construire un port de pêche industrielle à Nouakchott*, Xinhua French, Mar. 1, 2018, http://french.xinhuanet.com/2018-03/01/c_137009092.htm.

¹⁶⁶ “The 2017 China-Mauritania Joint Fisheries Committee meeting was held in Beijing.”

¹⁶⁷ Convention provisions outline duty to render assistance to persons in distress, see: *UN IMO SOLAS*, 1974.

¹⁶⁸ Convention text determines artisanal fishing areas, see: *Convention on the Determination of the Minimal Conditions for Access and Exploitation of Marine Resources within the maritime areas under the jurisdiction of the SRFC’s Member States (Article 23 Regulation de l’acces a la peche artisanale)*, Commission Sous-Regional Des Peches Sus-Regional Fisheries Commission, (June 8, 2012), accessed Oct. 4, 2021, https://spscrp.org/spscrp/sites/default/files/csrp/documents/csrp2012/csrp-CMA_version_originale_juin_2012_fr.pdf. Of note, the PRC is not a convention member.

¹⁶⁹ *Declarations of “Nouakchott 20 September 2001” and “Dakar 28 March 2014” on illegal, unregulated and unreported fishing*, Commission Sous-Regional Des Peches Sus-Regional Fisheries Commission., (Mar. 28, 2014), accessed Oct. 4, 2021, https://spscrp.org/spscrp/sites/default/files/csrp/documents/CSRP-2001-Decl_Nouakchott.pdf. Of note, the PRC is not a convention member.

¹⁷⁰ Document describes Mauritania’s artisanal fisheries and restrictions on industrial trawlers therein, see: *Description and evaluation of fishery resources in the Mauritanian EZE (Description et evaluation des ressources halieutiques de la zee mauritanienne)*, UN Food and Agricultural Organization (FAO), (Sept. 27, 1985), accessed Oct. 4, 2021, <http://www.fao.org/3/r9048f/R9048F02.htm>.

¹⁷¹ Adam Hartman, “Navy Intercepts Suspicious Fishing Vessels,” *The Namibian*, Mar. 31, 2020, <https://www.namibian.com.na/199650/archive-read/Navy-intercepts-suspicious-fishing-vessels>; “Chinese Vessels Found in Namibian Waters: Something Fishy?,” *Erongo*, Mar. 30, 2020, <https://www.erongo.com.na/news/chinese-vessels-found-in-namibian-waters-2020-03-30>; Eveline De Klerk, “Namibia: Chinese Trawlers Seized for Illegal Fishing,” *New Era (Windhoek)*, Mar. 30, 2020, <https://neweralive.na/posts/chinese-trawlers-seized-for-illegal-fishing>.

¹⁷² See, for example, “Navy Intercepts Suspicious Fishing Vessels.”; “Chinese Vessels Found in Namibian Waters: Something Fishy?,” Namibia Press Agency, “Six Chinese Fishing Vessels Under Investigations,” *Namibia News Digest*, Mar. 31, 2020, <https://www.namibianewsdigest.com/six-chinese-fishing-vessels-under-investigations/>; “Namibia: Chinese Trawlers Seized for Illegal Fishing.”

¹⁷³ “Navy Intercepts Suspicious Fishing Vessels.”; “Six Chinese Fishing Vessels Under Investigations.”

¹⁷⁴ “Chinese Vessels Spark New IUU Fishing Concerns,” *Fishing Industry News*, Apr. 1, 2020, <https://www.fishingindustrynewssa.com/2020/04/01/chinese-vessels-spark-new-iuu-fishing-concerns/>.

¹⁷⁵ “Navy Intercepts Suspicious Fishing Vessels.”; “Embassy Spokesperson Statement,” Facebook Page: Embassy of the People’s Republic of China in the Republic of Namibia, Mar. 28, 2020, <https://www.facebook.com/profile/100064740756584/search/?q=fish>.

¹⁷⁶ “Held: Fishing Trawlers Entered South African Waters Without Permission Due to Bad Weather,” *The Citizen* (Gaoteng), Apr. 24, 2020, https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwjRisyepsXzAhVNTTABHSTbDb4QFnoECAsQAQ&url=http%3A%2F%2Foverseas.mofa.go.kr%2Fzako%2Fbrd%2Fm_9938%2Fdown.do%3Fbrd_id%3D12753%26seq%3D1347306%26data_tp%3DA%26file_seq%3D1&usg=AOvVaw1oo2CiaAJ4IJE4UQFm7-Gi.

¹⁷⁷ According to a Namibian Navy official, the Navy detained the PRC vessels in response to reports of illegal activity and contradictory statements from the crew, noting that the PRC crew “initially refused to cooperate and wanted to proceed with their way to China.” See: “Chinese Vessels Cleared of Illegal Fishing,” *New Era Live*, Apr. 1, 2020, <https://neweralive.na/posts/chinese-vessels-cleared-of-illegal-fishing>; “Navy Intercepts Suspicious Fishing Vessels.”; “Chinese Vessels Found in Namibian Waters: Something Fishy?”

¹⁷⁸ “Embassy Spokesperson Statement.”

¹⁷⁹ *Ibid.* Of note, while the PRC embassy produces a weekly variety radio program that is broadcast nationwide by the Namibian Broadcasting Cooperation (NBC)’s English national FM station, this program has not addressed China’s presence in the Namibian maritime, see: Ndalimpinga Iita, “Chinese Culture Radio Series Gaining Popularity in Namibia,” *Xinhua*, Oct. 24, 2020, http://www.xinhuanet.com/english/2020-10/24/c_139464503.htm; “Incredible China EP 26: China-Namibia Friendship; EP 15: China-Namibia Friendship Highlights in 2020,” *Sound Cloud*, Mar. 17; Jan. 2, 2021, <https://soundcloud.com/discover/sets/artist-stations:904960045>.

¹⁸⁰ See, for example, “Remarks by H.E. Ambassador Xin Shunkang at the Zambezi Bream Festival and Cultural Expo,” Embassy of the People’s Republic of China in the Republic of Namibia, Aug. 12, 2015, <http://na.china-embassy.org/eng/sgxw/t1288538.htm>; “PRC Ambassador to Namibia Facebook Post about Tunacor Fisheries Ltd,” Facebook Page: PRC Ambassador to Namibia Yiming Zhang, June 30, 2019, <https://www.facebook.com/profile/100022338870646/search/?q=fish>.

¹⁸¹ “Xi Jinping Exchanges Congratulatory Messages with Namibian President Hage Geingob on the 30th Anniversary of the Establishment of China-Namibia Diplomatic Relations,” Ministry of Foreign Affairs of the People’s Republic of China, Mar. 22, 2020, https://www.fmprc.gov.cn/mfa_eng/wjb_663304/zzjg_663340/fzs_663828/xwlb_663830/t1760172.shtml; “President Xi Jinping Speaks with Namibian President Hage Geingob on the Phone,” Ministry of Foreign Affairs of the People’s Republic of China, Apr. 3, 2020, https://www.fmprc.gov.cn/mfa_eng/wjb_663304/zzjg_663340/fzs_663828/xwlb_663830/t1766118.shtml.

¹⁸² *SEAFO Convention on fishing Logbook*, South East Atlantic Fisheries Organisation, accessed Oct. 12, 2021, <http://www.seafo.org/About/Convention-Text>. Of note, the PRC is not a convention member.

¹⁸³ Marine resources act requires keeping and reporting of fishing records, see: *Namibia Promulgation of Marine Resources Act, 2000 (Act 27 of 2000)*, FAOLEX, (2000), UN Food and Agriculture Organization, <http://extwprlegs1.fao.org/docs/pdf/nam44344.pdf>.

¹⁸⁴ Maritime traffic act requires permission for anchoring in territorial seas, see: *Marine Traffic Act 2 of 1981* Republic of Namibia, (1981), Legal Assistance Center of Namibia, <http://www.lac.org.na/laws/annoSTAT/Marine%20Traffic%20Act%202%20of%201981.pdf>.

¹⁸⁵ *Equatorial Guinea - Fishery Agreement between Equatorial Guinea and EEC of 1984*, FAOLEX, (June 30, 1997), UN Food and Agriculture Organization, <https://www.fao.org/3/v9982e/v9982e1c.htm>.

¹⁸⁶ Including laws, policies, regulations, and proposed regulations that prohibit the alleged activity within the PRC territorial waters and EEZ.

¹⁸⁷ *White Paper on Compliance of China’s Distant-Water Fishing (中国远洋渔业履约白皮书)*, Nov. 2020. Additionally, the 2020 PRC White Paper on China’s Offshore Fisheries Contract Performance calls to “Establish a data collection and reporting system for deep-sea fisheries. China attaches great importance to the collection and submission of basic ocean fishery production statistics and related data and has established a system covering ocean fishery enterprises and ocean fishing vessel information, vessel position monitoring, fishing logs, reprinting, national observers, information

vessels, port sampling, scientific investigations, and exploratory fishing. And other full range of offshore fisheries data Collection system, and in accordance with relevant regulations of relevant regional fisheries management organizations, timely report all kinds of fishery data, and fulfill fishery data collection and reporting obligations.”

¹⁸⁸ Mech Dara, “Chinese People-Smuggling Ship Traveled Six Days, more than 2,500 Km: Authorities,” Voice of Democracy, July 27, 2021, <https://vodenglish.news/chinese-people-smuggling-ship-traveled-six-days-more-than-2500-km-authorities/>; “Smuggled Chinese on Ship Test Positive for COVID,” Cambodia News English, July 30, 2021, <https://cne.wtf/2021/07/30/smuggled-chinese-on-ship-test-positive-for-covid/>; “Thirty-six Chinese ships smuggling into Cambodia were cracked down on in Koh Rong,” នាវាដឹកជនជាតិចិន៣៦នាក់ លួចឆ្លងដែនចូលកម្ពុជាដោយខុសច្បាប់

ត្រូវសមត្ថកិច្ចបង្ក្រាបបាននៅក្រុងកោះរ៉ុង, Cambodia Police, July 26, 2021, https://cambodiapolice-com.translate.google.com/policekh/297249?_x_tr_sl=km&_x_tr_tl=en&_x_tr_hl=en&_x_tr_pto=nui,sc.

¹⁸⁹ “36 Chinese nationals arrested for illegally entering Cambodia via sea,” Khmer Times, July 26, 2021, <https://www.khmertimeskh.com/50901093/36-chinese-nationals-arrested-for-illegally-entering-cambodia-via-sea/>; “Thirty-Six Chinese Ships Smuggling into Cambodia Were Cracked Down on Koh Rong (Video Inside),” នាវាដឹកជនជាតិចិន៣៦នាក់ លួចឆ្លងដែនចូលកម្ពុជាដោយខុសច្បាប់

ត្រូវបានបង្ក្រាបនៅក្រុងកោះរ៉ុង Fresh News, July 26, 2021, https://m-freshnewsasia-com.translate.google.com/index.php/en/localnews/206606-2021-07-26-08-23-40.html?_x_tr_sch=http&_x_tr_sl=km&_x_tr_tl=en&_x_tr_hl=en&_x_tr_pto=nui,sc.

¹⁹⁰ “Thirty-Six Chinese Ships Smuggling into Cambodia Were Cracked Down on Koh Rong (Video Inside).”

¹⁹¹ “36 Chinese Nationals Detained in Cambodian Waters,” Cambodia News English, July 25, 2021, <https://cne.wtf/2021/07/25/36-chinese-nationals-detained-in-cambodian-waters/>; “36 Chinese Nationals Arrested for Illegally Entering Cambodia on a Ship from China,” Kampuchea Thmey, July 24, 2021, https://www-kampucheamey-com.translate.google.com/local-news/168008/?_x_tr_sl=km&_x_tr_tl=en&_x_tr_hl=en&_x_tr_pto=nui,sc.

¹⁹² Chun Chanboth, “Authorities ready to deport 36 Chinese nationals after illegally entering Cambodia by water,” អាជ្ញាធរគ្រឿងបញ្ជូនជនជាតិចិន ៣៦នាក់ត្រលប់ទៅប្រទេសកំណើតវិញ ក្រោយលួចចូលកម្ពុជាខុសច្បាប់តាមផ្លូវទឹក, Radio Free Asia, July 27, 2021, https://www-rfa-org.translate.google.com/khmer/news/social-economy/authorities-ready-to-deport-36-chinese-back-country-after-smuggling-into-cambodia-07272021162935.html?_x_tr_sl=km&_x_tr_tl=en&_x_tr_hl=en&_x_tr_pto=nui,sc; “Thirty-six Chinese ships smuggling into Cambodia were cracked down on in Koh Rong.”

¹⁹³ See, for example, “China, Thailand Sign Memorandum of Understanding on Intergovernmental Cooperation to Prevent and Prevent Human Trafficking,”

ប្រទេសចិននិងថៃចុះហត្ថលេខាលើអនុស្សរណៈនៃការយោគយល់គ្នាស្តីពីកិច្ចសហប្រតិបត្តិការអន្តររដ្ឋាភិបាលដើម្បីបង្ការនិងទប់ស្កាត់ការជួញដូរមនុស្ស, Cambodian CRI, Nov. 3, 2018,

https://cambodian-cri-cn.translate.google.com/i/20181103/c3107269-6b7a-44ea-4bcc-13a6c9a2657b.html?_x_tr_sch=http&_x_tr_sl=km&_x_tr_tl=en&_x_tr_hl=en-US&_x_tr_pto=nui,op,sc; “ASEAN Regional Forum Defense Officials’ Dialogue Meeting Held in Phnom Penh,”

កិច្ចប្រជុំសន្ទនារបស់មន្ត្រីការពារជាតិនៃវេទិកាតំបន់អាស៊ានបានបើកធ្វើនៅភ្នំពេញ, Cambodian CRI, May 25, 2012, https://cambodian-cri-cn.translate.google.com/141/2012/05/25/1s5481.htm?_x_tr_sch=http&_x_tr_sl=km&_x_tr_tl=en&_x_tr_hl=en-US&_x_tr_pto=nui,op,sc;

“Lancang-Mekong Countries Launch Joint Crackdown on Human Trafficking,” Xinhua, Sept. 3, 2019, http://xinhuanet.com/english/2019-09/03/c_138362117.htm; Zhang Yan,

“Crushing Cross-Border Trafficking,” China Daily, Aug. 30, 2019,

http://www.chinadaily.com.cn/global/2019-08/30/content_37506664.htm; “Lancang-Mekong Cooperation: After Five Fruitful Years, a New Journey Awaits,” Ministry of Foreign Affairs of the

People's Republic of China, Apr. 14, 2021, <https://www.fmprc.gov.cn/ce/cemm/eng/sgxw/t1868878.htm>.

¹⁹⁴ “The Spokesperson of the Chinese Embassy in Cambodia Made a Statement on the Cambodian Media's Report on the "China Town" In Sihanoukville,” 中国驻柬埔寨使馆发言人就柬媒体报道西哈努克省“中国城”有关情况发表谈话, Embassy of the People's Republic of China in Cambodia, Sept. 8, 2021, <http://kh.china-embassy.org/chn/dssghd/t1905615.htm>.

¹⁹⁵ “36 Chinese Were Arrested for Smuggling into Cambodia! What Is Hidden Behind the 'Black Industry Chain'?” 36 名中国人偷渡柬埔寨被抓! 背后究竟暗藏什么“黑产业链”? , TNAOT, 柬埔寨头条 app, July 26, 2021, <https://www.tnaot.com/zh/m/%3Fpageindex%3D252+%cd=2&hl=en&ct=clnk&gl=us>.

¹⁹⁶ See, for example, Huang Lanlan, Li Qiao, and Hu Yuwei, “Western-Aligned Opposition Forces in Cambodia Exaggerate Anti-China Sentiment,” *Global Times*, Jan. 14, 2020, <https://www.globaltimes.cn/content/1176808.shtml>; “Chinese Foreign Ministry Spokeswoman Jiang Yu's Regular Press Conference on Hong Kong-China,”

ការិយាល័យស្តង់ដារនៃក្រសួងការបរទេសចិនប្រចាំនៅហុងកុងក្នុងព្រមានយ៉ាងម៉ឺងម៉ាត់ចំពោះភាគីអាមេរិកថា កុំលាបពណ៌ច្បាប់សន្តិសុខជាតិនៅហុងកុងដោយចេតនា, Cambodian CRI, May 25, 2012, https://cambodian-cri-cn.translate.google.com/20210704/f06037a1-2462-16ca-affa-10f8817d67c7.html?_x_tr_sch=http&_x_tr_sl=km&_x_tr_tl=en&_x_tr_hl=en-US&_x_tr_pto=nui,op,sc; “China, a Group of Countries, Addressed the UN Human Rights Council, Focusing on Human Trafficking and US Forced Labor,”

ប្រទេសចិនតំណាងប្រទេសមួយក្រុមផ្លែដៃសន្ទុកថារួមក្នុងសន្និសីទក្រុមប្រឹក្សាសិទ្ធិមនុស្សនៃអង្គការសហប្រជាជាតិ

ដោយបានផ្ដោតការយកចិត្តទុកដាក់ដល់បញ្ហាដួងរួមនុស្សនិងសកម្មភាពបង្ខំឱ្យធ្វើពលកម្មរបស់អាមេរិក, Cambodian CRI, Sept. 18, 2021, https://cambodian-cri-cn.translate.google.com/20210918/e9cf8efe-916d-27a2-223e-76cdd0c67ca3.html?_x_tr_sch=http&_x_tr_sl=km&_x_tr_tl=en&_x_tr_hl=en-US&_x_tr_pto=nui,op,sc; “In a 600-Page Report on Human Trafficking in the United States, Only Half of the Pages Describe Its Problems in This Regard, with the Chinese Foreign Ministry Criticizing the United States for Perpetuating False Diplomacy,”

ក្នុងរបាយការណ៍ស្តីពីការដួងរួមនុស្សរបស់អាមេរិកដែលមានរហូតដល់ទៅ ៦០០ ទំព័រ មានតែកន្លះទំព័រប៉ុណ្ណោះដែលរៀបរាប់ពីបញ្ហារបស់ខ្លួន ទាក់ទិននឹងរឿងនេះ

ក្រសួងការបរទេសចិនរិះគន់អាមេរិកថា បានអនុវត្តការទូតបែបភូតកុហកជាប់រហូត, July 9, 2021, https://cambodian-cri-cn.translate.google.com/20210709/82712c04-fc3b-7819-6996-b5f64eb8e814.html?_x_tr_sch=http&_x_tr_sl=km&_x_tr_tl=en&_x_tr_hl=en-US&_x_tr_pto=nui,op,sc; “Foreign Ministry Spokesperson Zhao Lijian's Regular Press Conference on September 23, 2021,” Ministry of Foreign Affairs of the People's Republic of China, Sept. 23, 2021, https://www.fmprc.gov.cn/mfa_eng/xwfw_665399/s2510_665401/2511_665403/t1909182.shtml.

¹⁹⁷ *Law on Suppression of Human Trafficking and Sexual Exploitation Article 18: Cross-border Transportation (The Act of Bringing a Person Cross-border)*, Kingdom of Cambodia, (2007), accessed Oct. 14, 2021, UNICEF and ILO, https://www.ilo.org/dyn/natlex/natlex4.detail?p_lang=en&p_isn=93355.

¹⁹⁸ *1990 International Convention on the Protection of the Rights of All Migrant Workers and Their Families*, United Nations Human Rights, (Dec. 18, 1990), <https://www.ohchr.org/en/professionalinterest/pages/cmw.aspx>.

¹⁹⁹ Law prohibits illegal cross-border transportation, see: *Law on Suppression of Human Trafficking and Sexual Exploitation Article 18: Cross-border Transportation (The Act of Bringing a Person Cross-border)*, 2007.

²⁰⁰ Including laws, policies, regulations, and proposed regulations that prohibit the alleged activity within the PRC territorial waters and EEZ.

²⁰¹ Article 240 describes human trafficking crimes; Article 303 describes illegal gambling, see: *Criminal Law of the People's Republic of China*, Fifth Session of the Eighth National People's Congress, (Mar. 14, 1997), UN ILO, <https://www.ilo.org/dyn/natlex/docs/ELECTRONIC/5375/108071/F-78796243/CHN5375%20Eng3.pdf>.

²⁰² U.S. Department of Homeland Security, "Automatic Identification System Overview," U.S. Coast Guard Navigation Center, accessed Sept. 30, 2021, <https://www.navcen.uscg.gov/?pageName=aismain>.

²⁰³ See, for example, *Article 24, Paragraph 1 and Paragraph 2 (12) of the "Regulations of the People's Republic of China on Maritime Affairs and Administrative Penalties" (中华人民共和国海上行政处罚规定: 第二十四条第一款及第二款第(十二))*, PRC Ministry of Transportation (中华人民共和国交通部), (Sept. 1, 2021), accessed Sept. 30, 2021,

<https://www.xindemarinenews.com/m/view.php?aid=32598>; *Notice of the Ministry of Agriculture and Rural Affairs on the Issuance of the "Measures for the Administration of Monitoring the Position of Ocean Fishing Vessels" (农业农村部关于印发《远洋渔船船位监测管理办法的通知》)*, Ministry of Agriculture and Rural Affairs (农业农村部) (Aug. 19, 2018), accessed Sept. 30, 2021,

http://www.gov.cn/xinwen/2019-08/19/content_5422285.htm; *Decision of the People's Government of Hainan Province on Amending the "Regulations on the Administration of the Safety Production of Marine Fishing Vessels in Hainan Province" (海南省人民政府关于修改〈海南省海洋渔船安全生产管理规定〉的决定)*, People's Government of Hainan Province (海南省人民政府) (Sept. 27, 2017), accessed Sept. 30, 2021,

<https://www.hainan.gov.cn/hainan/dfzfgz/201710/c6d50c366b5b4e679d1222b11b63834b.shtml>; *UN IMO SOLAS, 1974; Revised Guidelines for the Onboard Operational Use of Shipborne Automatic Identification Systems (AIS)*, International Maritime Organization, (Dec. 2, 2015), accessed Oct. 1, 2021, https://www.navcen.uscg.gov/pdf/ais/references/IMO_A1106_29_Revised_guidelines.pdf.

²⁰⁴ See, for example, "What Vessels Are Required to Use AIS? What Are Global Regulations and Requirements for Vessels to Carry AIS?," Global Fishing Watch, accessed Oct. 1, 2021, <https://globalfishingwatch.org/faqs/what-vessels-are-required-to-use-ais-what-are-global-regulations-and-requirements-for-vessels-to-carry-ais/>; Lacey Malarky and Beth Lowell, "Avoiding Detection: Global Case Studies of Possible AIS Avoidance," *Oceana*, Mar. 2018, <https://usa.oceana.org/publications/reports/avoiding-detection-global-case-studies-possible-ais-avoidance>; Joshua Goodman, "Great Wall of Lights: China's Sea Power on Darwin's Doorstep," AP and Univision, Sept. 24, 2021, <https://apnews.com/article/china-oceans-overfishing-squid-294ff1e489589b2510cc806ec898c78f>; Carmen Ferrà et al., *Using AIS to Attempt a Quantitative Evaluation of Unobserved Trawling Activity in the Mediterranean Sea*, *Frontiers in Marine Science*, 2020, <https://www.frontiersin.org/articles/10.3389/fmars.2020.580612/full>.

²⁰⁵ See, for example, "Lianyungang Maritime Investigation and Punishment of a Fishing Vessel Illegally Installing Cargo Ship AIS," 连云港海事查处一起渔船违法安装货船 AIS 行为, *Xinhua*, 新华社, Apr. 8, 2021, http://www.js.xinhuanet.com/2021-04/08/c_1127306535.htm; "AIS, the Things You Need to Know," *AIS*; 那些您需要了解的事儿, *The Paper*, 澎湃, Dec. 5, 2019,

https://www.thepaper.cn/newsDetail_forward_5153173; "Typical Case of Maritime Radio Order Rectification," 水上无线电秩序整治典型案例, *The Paper*, 澎湃, June 23, 2020,

https://www.thepaper.cn/newsDetail_forward_7969619; "Pollution: Clandestine Treatment of Garbage in China," *Pollution: Traitement clandestin des ordures en Chine*, *People's Daily French*, *le Quotidien du Peuple en ligne* 2017, https://french-people-com-cn.translate.goog/n3/2017/0223/c96851-9181873.html?_x_tr_sch=http&_x_tr_sl=fr&_x_tr_tl=en&_x_tr_hl=en&_x_tr_pto=nui,sc,elem.

²⁰⁶ See: Jaeyoon Park, "A 2020 Analysis: Detecting the Dark Fleets in North Korea and Russia," *Global Fishing Watch*, Jan. 20, 2021, <https://globalfishingwatch.org/fisheries/2020-analysis-dark-fleets/>;

Trevor Phillips-Levine, Dylan Phillips-Levine, and Walker Mills, "How NGOs Can Help Keep Tabs on China's Illegal Fishing Activity," *Maritime Executive*, Oct. 20, 2020, <https://www.maritime-executive.com/editorials/how-ngos-can-help-keep-tabs-on-china-s-illegal-fishing-activity>; "The Curious Case of the SU RI BONG," *Windward*, Apr. 20, 2020, https://windward.ai/blog/the-curious-case-of-the-su-ri-bong/?_hstc=223907780.247746a74fcdc3c545949a2506cf5540.1626264487711.1626264487711.1626264487711.1&_hssc=223907780.2.1626264487712&_hsfp=1621161622.

²⁰⁷ See, for example, PRC flagged Gang Tai 8 (Gross Tonnage 725) having 'gone dark' for four days in waters just outside the Ecuador EEZ in July 2020 prior to apparent transshipment to a refrigerated cargo vessel, raising concerns of illegal transshipment. "Great Wall of Lights: China's Sea Power on Darwin's Doorstep."; Tabitha Mallory and Ian Ralby, "Evolution of the Fleet: A Closer Look at the Chinese Fishing Vessels off the Galapagos," CIMSEC, Oct. 19, 2020, <https://cimsec.org/evolution-of-the-fleet-a-closer-look-at-the-chinese-fishing-vessels-off-the-galapagos/>; Ian Ralby, "Looking Past Gulf of Guinea Piracy: Chinese Twins, 'Ghanaian' Fishing, and Domain Awareness," CIMSEC, Mar. 17, 2021, <https://cimsec.org/category/ocean-governance/>.

²⁰⁸ Michael Field, "Murky Background to Vanuatu's Chinese Fishing Boat Arrests," *Asia Pacific Report*, Jan. 27, 2021, <https://asiapacificreport.nz/2021/01/27/michael-field-murky-background-to-vanuatus-chinese-fishing-boat-arrests/>.

²⁰⁹ "Looking Past Gulf of Guinea Piracy: Chinese Twins, 'Ghanaian' Fishing, and Domain Awareness."

²¹⁰ Rambo Talabong and Sofia Tomacruz, "The Sinking of Gem-Ver," *Rappler*, July 10, 2019, <https://specials.rappler.co/newsbreak/in-depth/234304-there-is-a-ship-about-hit-sinking-gem-ver-recto-bank-series-part-1/index.html>.

²¹¹ See: Septiari and Santosa, "Bakamla Intercepts Chinese Research Vessel in Sunda Strait."; Yahya, "Bakamla Suspects Chinese Survey Vessel Operates Underwater Sensors in Indonesian Waters."; Mai, "The Indonesian Patrol Vessel Blocked the Chinese Research Vessel in Sunda Strait."; "Chinese Research Vessel Intercepted in Indonesian Waters; Hints at Underwater Ops."

²¹² "A 2020 Analysis: Detecting the Dark Fleets in North Korea and Russia."

²¹³ "The Curious Case of the SU RI BONG."

²¹⁴ See: "A 2020 Analysis: Detecting the Dark Fleets in North Korea and Russia."; "How NGOs Can Help Keep Tabs on China's Illegal Fishing Activity."; "The Curious Case of the SU RI BONG."

²¹⁵ See, for example, PRC flagged Gang Tai 8 (Gross Tonnage 725) having 'gone dark' for four days in waters just outside the Ecuador EEZ in July 2020 prior to apparent transshipment to a refrigerated cargo vessel, raising concerns of illegal transshipment. "Great Wall of Lights: China's Sea Power on Darwin's Doorstep."; "Evolution of the Fleet: A Closer Look at the Chinese Fishing Vessels off the Galapagos."; "Looking Past Gulf of Guinea Piracy: Chinese Twins, 'Ghanaian' Fishing, and Domain Awareness."

²¹⁶ Willie, "Chinese Fishing Vessels Seized."

²¹⁷ Field, "Murky Background to Vanuatu's Chinese Fishing Boat Arrests."

²¹⁸ "Looking Past Gulf of Guinea Piracy: Chinese Twins, 'Ghanaian' Fishing, and Domain Awareness."

²¹⁹ See: Septiari and Santosa, "Bakamla Intercepts Chinese Research Vessel in Sunda Strait."; Yahya, "Bakamla Suspects Chinese Survey Vessel Operates Underwater Sensors in Indonesian Waters."; Mai, "The Indonesian Patrol Vessel Blocked the Chinese Research Vessel in Sunda Strait."; "Chinese Research Vessel Intercepted in Indonesian Waters; Hints at Underwater Ops."

²²⁰ "Chinese Research Vessel Intercepted in Indonesian Waters; Hints at Underwater Ops."; *Regulations for Carriage of AIS*, Dec. 31, 2004; *Indonesian Government Regulation No. 37 on the Rights and Obligations of Foreign Ships and Aircraft Exercising the Right of Archipelagic Sea Lane Passage Through Designated Archipelagic Sea Lanes*, 28 June 2002, June 28, 2020; "Chinese Research Vessel Intercepted in Indonesian Waters; Hints at Underwater Ops."

²²¹ Kristine Sabillo, "Satellite Data: Chinese Vessel in Reed Bank Incident Often Went 'Dark,'" *ABS-CBN News*, June 20, 2019, <https://news.abs-cbn.com/news/06/20/19/satellite-data-chinese-vessel-in>

reed-bank-incident-often-went-dark; Benjamin Pulta, "PH to Finally Get Compensation Offer for Gem-Ver Incident," Philippines News Agency, 2021, <https://www.pna.gov.ph/articles/1142951>.

²²² "The Sinking of Gem-Ver."

²²³ U.S. Coast Guard, "How Does AIS Compare and Contrast with VMS?," U.S. Coast Guard Navigation Center, accessed Oct. 1, 2021, https://www.navcen.uscg.gov/pdf/AIS/Q_AIS_vs_VMS_Comparison.pdf.

²²⁴ "Avoiding Detection: Global Case Studies of Possible AIS Avoidance."

²²⁵ See: "Foreign Ministry Spokesperson Zhao Lijian's Regular Press Conference on September 10, 2020," Ministry of Foreign Affairs for the People's Republic of China, Sept. 10, 2020, https://www.fmprc.gov.cn/mfa_eng/xwfw_665399/s2510_665401/t1813877.shtml; "Foreign Ministry Spokesperson Hua Chunying's Regular Press Conference on October 9, 2020," Ministry of Foreign Affairs for the People's Republic of China, Oct. 9, 2020, https://www.fmprc.gov.cn/mfa_eng/xwfw_665399/s2510_665401/t1822871.shtml; "Foreign Ministry Spokesperson Wang Wenbin's Regular Press Conference on September 28, 2020," Ministry of Foreign Affairs for the People's Republic of China, Sept. 28, 2020, https://www.fmprc.gov.cn/mfa_eng/xwfw_665399/s2510_665401/t1819548.shtml; "Foreign Ministry Spokesperson Wang Wenbin's Regular Press Conference on December 25, 2020," Ministry of Foreign Affairs for the People's Republic of China, Dec. 25, 2020, https://www.fmprc.gov.cn/mfa_eng/xwfw_665399/s2510_665401/t1842734.shtml.

²²⁶ See, for example, "Chinese Ministry of Foreign Affairs Denies Pompeo's 'Worried and Concerned' Statement on Chinese Fishing Vessel Operations on the High Seas.," "Chinese Fishing Vessels Operate in Accordance with Relevant International Laws," Los barcos pesqueros chinos operan de acuerdo con las leyes internacionales pertinentes, People's Daily Spanish, Sept. 11, 2020, <http://spanish.peopledaily.com.cn/n3/2020/0911/c31621-9759426.html>; "Pollution: Clandestine Treatment of Garbage in China."

²²⁷ See, for example, "Lianyungang Maritime Investigation and Punishment of a Fishing Vessel Illegally Installing Cargo Ship AIS.," "AIS, the Things You Need to Know.," "Typical Case of Maritime Radio Order Rectification.," "Pollution: Clandestine Treatment of Garbage in China."

²²⁸ The IMO requires AIS use by all vessels >500GT, for any vessel >300GT that is on an "international voyage" and for all passenger vessels. AIS should always be in operation when ships are underway or at anchor. If the master believes that the continual operation of AIS might compromise the safety or security of the ship or where security incidents are imminent, AIS may be switched off. Unless it would further compromise the safety or security, if the ship is operating in a mandatory ship reporting system, the master should report this action and the reason for doing so to the competent authority. *Revised Guidelines for the Onboard Operational Use of Shipborne Automatic Identification Systems (AIS)*, Dec. 2, 2015. *UN IMO SOLAS, 1974. Regulations for Carriage of AIS*, Dec. 31, 2004.

²²⁹ Including laws, policies, regulations, and proposed regulations that prohibit the alleged activity within the PRC territorial waters and EEZ.

²³⁰ *Notice of the Ministry of Agriculture and Rural Affairs on the Issuance of the "Measures for the Administration of Monitoring the Position of Ocean Fishing Vessels" (农业农村部关于印发《远洋渔船船位监测管理办法的通知》)*, Aug. 19, 2018. Additionally, the 2020 PRC White Paper on China's Offshore Fisheries Contract Performance notes that "All ocean-going fishing vessels must install and normally turn on the Vessel Position Monitoring System (VMS), and automatically report the position once an hour," see: *White Paper on Compliance of China's Distant-Water Fishing (中国远洋渔业履约白皮书)*, Nov. 2020.

²³¹ *Article 24, Paragraph 1 and Paragraph 2 (12) of the "Regulations of the People's Republic of China on Maritime Affairs and Administrative Penalties (中华人民共和国海上行政处罚规定: 第二十四条第一款及第二款第(十二))*, Sept. 1, 2021.

²³² See the following reports for examples involving foreign vessels from (1) the **Philippines**: "The Sinking of Gem-Ver.," Marlon Ramos, "Remember Gem-Ver? Redress for PH Fishermen Still Stuck in Talks," Philippine Daily Inquirer, June 9, 2021, [CNA Information Memorandum | 66](https://newsinfo.inquirer.net/1443586/remember-</p></div><div data-bbox=)

gem-ver-redress-for-ph-fishermen-still-stuck-in-talks; “PH to Finally Get Compensation Offer for Gem-Ver Incident.” (2) **Vietnam:** “China Accused the Vietnamese Fishing Boat of Ramming the Coast Guard Ship, so It Sank,” Trung Quốc cáo buộc tàu cá Việt Nam đâm tàu hải cảnh nên bị chìm, Radio Free Asia, Apr. 5, 2020, https://www.rfa-org.translate.google.com/vietnamese/news/vietnamnews/china-accuse-vn-of-ramming-coast-guard-04052020080735.html?_x_tr_sl=vi&_x_tr_tl=en&_x_tr_hl=en&_x_tr_pto=nui,sc; Drake Long, “US Condemns Sinking of Vietnam Fishing Vessel by Chinese Coast Guard,” Radio Free Asia, Apr. 6, 2020, <https://www.rfa.org/english/news/china/vietnam-southchinasea-04062020154618.html>; “Fishermen Tell Stories of Being Rammed and Sunk by Chinese Ships in the Paracels,” Ngư dân kể chuyện bị tàu Trung Quốc đâm chìm ở Hoàng Sa, Than Nien, May 4, 2020, <https://thanhnien.vn/ngu-dan-ke-chuyen-bi-tau-trung-quoc-dam-chim-o-hoang-sa-post943046.html>. (3) **Senegal:** “Fisherman Burned in Confrontation with Chinese Trawler,” Africa Defense Forum, Sept. 19, 2020, <https://adf-magazine.com/2020/11/fisherman-burned-in-confrontation-with-chinese-trawler/>. (4) **Mauritania:** “Mauritania: 3 Fishermen Were Killed After Their Boat Collided with a Chinese Ship.”; “Mauritania: 3 Fishermen Died After Their Boat Collided with a Chinese Ship, and the Matter Worsened.” (5) **Brazil:** Mikhail Voytenko, “Fishing Wars in South Atlantic. Chinese vs. Brazilian.,” FleetMon, Nov. 25, 2018, <https://www.fleetmon.com/maritime-news/2018/24369/fishing-wars-south-atlantic-chinese-vs-brazilian/>.

²³³ “Satellite Data: Chinese Vessel in Reed Bank Incident Often Went ‘Dark.’”; “PH to Finally Get Compensation Offer for Gem-Ver Incident.”

²³⁴ “The Sinking of Gem-Ver.”

²³⁵ “Mauritania: 3 Fishermen Died After Their Boat Collided with a Chinese Ship, and the Matter Worsened.”; “Mauritania: 3 Fishermen Were Killed After Their Boat Collided with a Chinese Ship.”

²³⁶ “Mauritania: 3 Fishermen Were Killed After Their Boat Collided with a Chinese Ship.”

²³⁷ “Fishermen Tell Stories of Being Rammed and Sunk by Chinese Ships in the Paracels.”

²³⁸ “China Accused the Vietnamese Fishing Boat of Ramming the Coast Guard Ship, so It Sank.”

²³⁹ “A Senegalese Fisherman Burned Alive by Chinese off the Coast of Gambia,” Un pêcheur sénégalais brûlé vif par des Chinois, Fandene TV Facebook Page, Sept. 25, 2020, https://m.facebook.com/413024349490289/photos/a.454433722016018/777875543005166/?type=3&_rdr; Maria Diop, “Senegalese Fisherman Burned Alive by Chinese,” Seneweb.com, Sept. 25, 2020, <https://www.archyde.com/senegalese-fisherman-burned-alive-by-chinese/>.

²⁴⁰ “Fisherman Burned in Confrontation with Chinese Trawler.”

²⁴¹ “Brazilian Ship Attacked by Chinese in Dispute for Tuna, Union Says,” Navio brasileiro é atacado por chineses em disputa por atum, diz sindicato, UOL, Nov. 27, 2018, https://noticias-uol-com-br.translate.google.com/cotidiano/ultimas-noticias/2018/11/27/navio-brasileiro-piratas-chineses-pesca-atum-rn.htm?_x_tr_sl=pt&_x_tr_tl=en&_x_tr_hl=en&_x_tr_pto=nui,sc.

²⁴² See, for example, “The Chinese Embassy in Vietnam Has Expressed Its Stance on the US’s Offensive Speech Against China,” Đại sứ quán Trung Quốc tại Việt Nam tỏ rõ lập trường về ngôn luận công kích Trung Quốc của Mỹ, Consulate General of the People’s Republic of China in Da Nang, 中哈人民共和国驻岷港总领事馆, Oct. 31, 2020, https://www.fmprc.gov.cn/ce/cgdanang/vn/lgdt_3/t1831055.htm. “The Chinese Embassy Is Highly Concerned About the Collision Between a Philippine Fishing Vessel and a Hong Kong Freighter, and Requires the Investigation of the Cause,” 中使馆高度关注菲律宾渔船与香港货轮相撞事故, 要求查明原因, *The Paper*, 澎湃, 2020, https://www.thepaper.cn/newsDetail_forward_8056053; *The Development of China’s Marine Programs*, Permanent Mission of the People’s Republic of China to the United Nations and Other International Organizations in Vienna, (June 2), fmprc.gov, <https://www.fmprc.gov.cn/ce/cgvienna/eng/ljzg/zfbps/t127404.htm>.

²⁴³ See, for example, “China in America: Stop Baseless Criticism,” Tsina sa Amerika: Itigil ang walang batayang pagbatikos, CRI Filipino, Apr. 21, 2020, https://filipino-cri-cn.translate.google.com/301/2020/04/21/109s167325.htm?_x_tr_sch=http&_x_tr_sl=tl&_x_tr_tl=en&_x_tr_hl=en&_x_tr_pto=nui,sc; “The Japanese Destroyer Collided with a Chinese Fishing Boat and Returned to Hong

Kong. The Side of the Apron Was Knocked out of a Crack,” 日本驱逐舰与中国渔船相撞后返港 停机坪侧面被撞出裂口, People's Daily, 人民日报, Apr. 14, <http://military.people.com.cn/n1/2020/0414/c1011-31672945.html>; “Vietnam Disrupts Chinese Company's Exploration of Xisha Islands, Illegal — Chinese Ambassador to Australia,” Panggugulo ng Biyetnam sa paggalugad ng kompanyang Tsino sa Xisha Islands, ilegal—embahador Tsino sa Australia, CRI Filipino, June 12, 2014, https://filipino-cri-cn.translate.google.com/301/2014/06/12/103s129276.htm?_x_tr_sch=http&_x_tr_sl=tl&_x_tr_tl=en&_x_tr_hl=en-US&_x_tr_pto=nui,op,sc; “A Vietnamese Fishing Boat Sank While Harassing and Colliding with a Chinese Fishing Vessel in the Waters of China's Xisha Islands-The Fishermen on Board Were Rescued,” Một tàu cá Việt Nam bị chìm trong khi quấy nhiễu và đâm va tàu cá Trung Quốc tại vùng biển quần đảo Tây Sa Trung Quốc-Các ngư dân trên tàu đã được cứu, CRI Vietnamese, May 27, 2014, <http://vietnamese.cri.cn/421/2014/05/27/1s199175.htm>.

²⁴⁴ “A Vietnamese Fishing Boat Sank While Harassing and Colliding with a Chinese Fishing Vessel in the Waters of China's Xisha Islands-The Fishermen on Board Were Rescued.”

²⁴⁵ See, for example, “Press Release on the So-Called Collision of Fishing Boats Between China and the Philippines,” Embassy of the People's Republic of China in the Republic of the Philippines, June 15, 2019, <http://ph.china-embassy.org/eng/sgfyrbt/t1672506.htm>; “The Ministry of Foreign Affairs Talks About the Collision of Chinese and Philippine Fishing Boats: I Believe the Two Sides Can Properly Handle the Matter,” 外交部谈中菲渔船相撞：相信双方能够妥善处理此事, Xinhua, 新华社, June 17, 2019, http://www.xinhuanet.com/world/2019-06/17/c_1124635672.htm; “Chinese and Philippine Fishing Boats Accidentally Collided: Not Suitable for Politicized Interpretation,” 中菲渔船意外相撞 外交部：不宜政治化解读, The Observer, 观察者, June 17, 2019, https://www.guancha.cn/politics/2019_06_17_505980.shtml; “The Ministry of Foreign Affairs Talks About the Collision of Chinese and Philippine Fishing Boats: It Is Recommended to Initiate a Joint Investigation As Soon As Possible,” 外交部谈中菲渔船相撞事件：建议尽快启动联合调查, Xinhua, 新华社, June 20, 2019, http://www.xinhuanet.com/world/2019-06/20/c_1124650679.htm; “The Ministry of Foreign Affairs Talks About the Collision of Chinese and Philippine Fishing Boats: I Believe the Two Sides Can Properly Handle the Matter.”

²⁴⁶ “Press Release on the So-Called Collision of Fishing Boats Between China and the Philippines.”; “Philippines' Duterte says it's senseless to confront China in South China Sea,” CGTN, July 23, 2019, <https://news.cgtn.com/news/2019-07-23/Duterte-defends-his-China-policy-in-annual-address--lykPleMGcg/index.html>; “Chinese and Philippine Fishing Boats Accidentally Collided: Not Suitable for Politicized Interpretation.”

²⁴⁷ *1988 Convention for the Suppression of Unlawful Acts Against the Safety of Maritime Navigation*, International Maritime Organization, (June 26, 1992), UN, <https://treaties.un.org/doc/db/terrorism/conv8-english.pdf>.

²⁴⁸ *Convention on the International Regulations for Preventing Collisions at Sea, 1972 (COLREGs)*, International Maritime Organization, <https://www.imo.org/en/About/Conventions/Pages/COLREG.aspx>.

²⁴⁹ *UN IMO SOLAS*, 1974.

²⁵⁰ Including laws, policies, regulations, and proposed regulations that prohibit the alleged activity within the PRC territorial waters and EEZ.

²⁵¹ New plan outlines measures for prevention of fishing vessel collisions, see: “The Ministry of Agriculture and Rural Affairs and the Ministry of Transport jointly launched a special action to prevent and curb collisions between commercial and fishing boats,” 农业农村部交通运输部联合开展专项行动 防范遏制商渔船碰撞事故 Ministry of Agriculture and Rural Affairs, 农业农村部网站, July 29, 2021, http://www.gov.cn/xinwen/2021-07/29/content_5628103.htm.

²⁵² *Decision of the People's Government of Hainan Province on Amending the "Regulations on the Administration of the Safety Production of Marine Fishing Vessels in Hainan Province"* (海南省人民政府关于修改〈海南省海洋渔船安全生产管理规定〉的决定), Sept. 27, 2017.

This report was written by CNA's China and Indo-Pacific Security Affairs Division (CIP).

CNA's China and Indo-Pacific Security Affairs Division provides its sponsors with timely, data-based analyses on a wide range of security issues across the Indo-Pacific region, providing decision-makers the context they need to make informed choices and plans.

CNA is a not-for-profit research organization that serves the public interest by providing in-depth analysis and result-oriented solutions to help government leaders choose the best course of action in setting policy and managing operations.



Dedicated to the Safety and Security of the Nation

IIM-2021-U-031286-Final

3003 Washington Boulevard, Arlington, VA 22201

www.cna.org • 703-824-2000