



## **Comments to the Thirty-seventh Session of the FAO Committee on Fisheries (COFI37)**

**7–11 September 2026**

The [International Coalition of Fisheries Associations](http://www.fishcoalition.org) (ICFA) welcomes the opportunity to provide comments to the Thirty-seventh Session of the FAO Committee on Fisheries (COFI37).

ICFA represents national fish and seafood industry associations from major fishing nations around the world. Our members are committed to the sustainable use of marine resources, science-based fisheries management and the contribution that sustainable fisheries make to global food security, employment and coastal communities.

ICFA congratulates FAO on the extensive work undertaken since COFI36 and encourages the Committee to maintain a strong focus on FAO's core fisheries mandate: improving fisheries management, strengthening science and data, eliminating illegal, unreported and unregulated (IUU) fishing, supporting regional fisheries bodies, and ensuring that sustainable fisheries contribute fully to global food security and nutrition.

Below is a summary of recommendations organized by agenda item. This is followed by normative comments on alignment of priorities between FAO and ICFA.

### **Summary of ICFA Recommendations by COFI37 Agenda Item**

ICFA respectfully offers the following recommendations for consideration by COFI37.

#### **Agenda Item 4 – State of world fisheries and aquaculture and progress in implementation of the Code of Conduct for Responsible Fisheries and related instruments**

ICFA recommends that COFI:

- reaffirm effective fisheries management as the foundation of sustainable fisheries and support the objective of bringing 100 percent of the world's fisheries under effective management;
- encourage Members to strengthen fisheries science, data collection, stock assessment, monitoring, enforcement and management capacity, particularly for fisheries and regions where capacity remains limited;
- recognize that fisheries subject to effective, science-based management can provide sustainable food while supporting employment, communities and economies;
- recognize the essential contribution of sustainably harvested aquatic foods to global food security and nutrition; and
- prioritize implementation and capacity building to address the continuing constraints that prevent Members from fully implementing the Code of Conduct for Responsible Fisheries.

#### **Agenda Item 6 – Decisions and recommendations of the COFI Sub-Committee on Fish Trade**

ICFA recommends that COFI:

- endorse the report of the Sub-Committee on Fish Trade;

- support FAO's continued engagement in international processes affecting fisheries and seafood trade, including BBNJ, CBD, CITES, PSMA, WTO Agreement on Fisheries Subsidies, and CODEX Alimentarius;
- reaffirm FAO's important advisory role in CITES processes concerning commercially exploited aquatic species and the importance of science- and evidence-based decision-making;
- support stronger international cooperation to combat IUU fishing and implementation of the Port State Measures Agreement;
- promote greater recognition of aquatic foods in food-security strategies, policies and dietary guidance; and
- encourage coherence and coordination among international organizations to minimize duplication and conflicting approaches affecting fisheries and seafood trade.

### **Agenda Item 7 – Decisions and recommendations of the COFI Sub-Committee on Fisheries Management**

ICFA recommends that COFI:

- endorse the report of the Sub-Committee on Fisheries Management while emphasizing the importance of effective management across all fisheries;
- support FAO's proposed Global Programme for Capacity Development in Fisheries Data Collection and Stock Assessment;
- strengthen RFBs and RFMOs and recognize their central role in the science, assessment and management of shared and high-seas fisheries;
- encourage Members to provide RFBs and RFMOs with the scientific, technical and financial resources necessary to fulfil their mandates;
- recognize that sustainability should be evaluated according to stock status, environmental impacts and the effectiveness of fisheries management rather than assumptions based solely on fishing gear or scale;
- explicitly recognize the contribution of sustainably managed trawl fisheries to global aquatic food production, food security, employment and fishing communities; and
- support continued FAO scientific work on the environmental, economic – social and food-security dimensions of trawl fisheries, including measures and technologies that reduce ecosystem impacts.

### **Agenda Item 8 – Progress in addressing Illegal, Unreported and Unregulated fishing through international, regional and national actions**

ICFA recommends that COFI:

- reiterate its strong condemnation of IUU fishing and recognize the harm it causes to sustainable fisheries, legitimate fishing operators, food security and fishing communities;
- encourage remaining Members to become Parties to and fully implement the Port State Measures Agreement and other relevant international fisheries instruments;
- strengthen flag, port, coastal and market State responsibilities, monitoring, control and surveillance, vessel registration and information sharing;

- encourage Members to provide accurate and current vessel and ownership information through the FAO Global Record and relevant regional systems; and
- provide adequate resources to FAO's Global Capacity Development Programme (GCDP) so FAO can respond to increasing requests from developing States for assistance in combatting IUU fishing.

### **Agenda Item 9 – Role of FAO and Regional Fishery Bodies in supporting implementation of international agreements relevant to fisheries and aquaculture**

ICFA considers this an especially important agenda item and recommends that COFI:

- reaffirm FAO's role as the authoritative global source of fisheries science, technical expertise and policy advice within international processes affecting fisheries;
- recognize RFBs and RFMOs as essential components of international ocean governance and ensure that their existing mandates, expertise and management responsibilities are fully respected;
- ensure that implementation of the BBNJ Agreement complements rather than duplicates or undermines existing fisheries management arrangements;
- support FAO's continued provision of fisheries expertise in CITES processes and encourage full implementation of the FAO-CITES Memorandum of Understanding;
- support FAO's continual work in the implementation of the CBD Global Biodiversity Framework especially on the targets related to fisheries;
- support FAO's technical role in implementation of the WTO Agreement on Fisheries Subsidies;
- promote coordination between fisheries, environment, foreign affairs and trade authorities at the national level so that positions taken in other international fora are informed by fisheries science and management expertise;
- improve coordination between FAO, RFBs and other international organizations; and
- ensure that expanding responsibilities associated with international agreements do not divert resources from FAO's fundamental mandate to improve fisheries science and management.

### **Agenda Item 10 – Adaptation and mitigation of fisheries and aquaculture to climate change, including extreme events**

ICFA recommends that COFI:

- support FAO's continued work to strengthen the scientific evidence concerning climate impacts on fisheries;
- strengthen the ability of Members and RFBs to incorporate changing stock productivity and distribution into adaptive fisheries management;
- recognize sustainably harvested aquatic foods as an important component of resilient global food systems;
- encourage appropriate integration of fisheries and aquatic foods into national and international climate strategies;
- support innovation in fishing technologies and vessel operations that can improve energy efficiency, reduce emissions and minimize environmental impacts; and

- ensure that climate policies affecting fisheries remain grounded in sound science and take account of food security, livelihoods and the different circumstances of fisheries around the world.

### **Agenda Item 11 – Supporting small-scale fisheries and aquaculture, including inland fisheries**

ICFA recommends that COFI:

- recognize the important contribution of small-scale fisheries to food security, employment and livelihoods;
- support efforts to improve data, assessment, monitoring and effective management of small-scale fisheries, particularly data-limited, multi-species and multi-gear fisheries;
- avoid assumptions that either small-scale or large-scale fisheries are inherently more sustainable;
- recognize that effective fisheries management is necessary regardless of the scale of the fishery;
- recognize the complementary contributions of small-scale and large-scale fisheries to food production, employment, economic development and food security; and

### **Agenda Item 12 – FAO's Programme of Work in fisheries and aquaculture under the FAO Strategic Framework**

ICFA recommends that COFI:

- support the proposed emphasis on strengthening fisheries data, stock assessment, science-based management and implementation of the ecosystem approach to fisheries;
- prioritize FAO's core comparative advantages in fisheries science, statistics, management and governance;
- support increased capacity of Members and RFBs/RFMOs to participate effectively in international fisheries and ocean governance processes;
- ensure adequate resources for FAO's work on effective fisheries management and elimination of IUU fishing;
- support FAO's work on fishing technologies and vessel innovations that improve safety, efficiency and environmental performance;
- explicitly include the sustainability and food-security contribution of responsibly managed trawl fisheries within FAO's fisheries programme;
- ensure FAO continues to provide authoritative fisheries expertise concerning BBNJ, CBD, CITES, UNFCCC, and other international processes; and
- ensure that growing demands associated with these international processes do not come at the expense of FAO's fundamental work to improve fisheries management.

### **Agenda Item 13 – Multi-year Programme of Work of the Committee**

ICFA recommends that COFI ensure that its future programme of work continues to give priority to:

- effective, science-based fisheries management;
- improving fisheries data and stock assessment;
- eliminating IUU fishing;

- strengthening RFBs and RFMOs;
- maintaining FAO's role as the authoritative fisheries voice within the broader international ocean governance system;
- recognizing the contribution of sustainable capture fisheries to global food security and nutrition; and
- ensuring that international fisheries policy remains grounded in science, effective management and sustainable use.

### **Alignment of Priorities between FAO and ICFA**

There is strong alignment between FAO's priorities for fisheries and aquaculture and ICFA's longstanding commitment to sustainable use, effective science-based fisheries management, food security and the elimination of IUU fishing. ICFA particularly welcomes FAO's emphasis on strengthening fisheries data and stock assessment, building management capacity, supporting Regional Fishery Bodies, and ensuring that fisheries expertise informs the growing number of international agreements and processes affecting the sector. The following comments highlight areas of particularly strong alignment, while identifying opportunities where ICFA and FAO can further strengthen their work.

#### **Effective fisheries management**

The latest information on the state of global fisheries demonstrates both the progress that effective fisheries management can achieve and the significant work that remains.

ICFA supports the objective of bringing 100 percent of the world's fisheries under effective fisheries management. Where robust science, effective management and appropriate monitoring and enforcement are in place, fisheries can and do produce sustainable food while supporting employment, communities and economies.

COFI should therefore encourage FAO Members to strengthen fisheries science, stock assessment, data collection, monitoring and management capacity, particularly in regions and fisheries where these capacities remain limited.

ICFA strongly supports FAO's continued leadership in this area. At a time of increasing demands on FAO resources, priority should be given to activities where FAO possesses unique fisheries expertise and can make the greatest contribution to improving fisheries sustainability.

#### **Regional fisheries bodies and international ocean governance**

ICFA welcomes the recognition of the central role of Regional Fisheries Bodies (RFBs), including Regional Fisheries Management Organizations (RFMOs), in sustainable fisheries management.

RFMOs now oversee approximately 95 percent of catches taken in areas beyond national jurisdiction. Their scientific expertise, management systems, data, monitoring and compliance mechanisms will therefore be essential to the effective implementation of international agreements affecting fisheries.

ICFA encourages COFI to reaffirm the important role of FAO and RFBs as the principal sources of fisheries expertise in international processes affecting fisheries, including implementation of the BBNJ Agreement, CITES decisions concerning commercially exploited aquatic species, the WTO Agreement on Fisheries Subsidies, the Convention on Biological Diversity and international climate processes.

As the international ocean governance framework becomes increasingly complex, greater coordination is needed rather than duplication of existing fisheries management structures.

ICFA therefore encourages FAO to continue providing independent, science-based fisheries expertise to these processes and encourages governments to ensure effective coordination between their fisheries



authorities and the ministries and agencies representing them in international environmental, biodiversity and trade negotiations.

### **Illegal, unreported and unregulated fishing**

ICFA reiterates its strong condemnation of IUU fishing.

IUU fishing undermines legitimate fishing operators, sustainable fisheries management, food security, employment and the livelihoods of fishing communities. ICFA welcomes progress in implementation of the Agreement on Port State Measures and complementary international and regional measures.

Nevertheless, significant implementation gaps remain.

ICFA encourages Members to strengthen flag, port, coastal and market State responsibilities; improve monitoring, control and surveillance; maintain accurate vessel records; strengthen information sharing; and fully implement relevant international fisheries instruments.

ICFA also encourages Members to provide FAO with sufficient resources to respond to the growing demand from developing countries for technical assistance and capacity development to combat IUU fishing.

### **Sustainable trawl fisheries**

ICFA encourages COFI and FAO to recognize explicitly the contribution of sustainably managed trawl fisheries to global aquatic food production and food security.

More than one-quarter of wild-caught seafood is harvested using bottom trawl fishing. These fisheries provide hundreds of billions of meals annually and support fishing communities, seafood businesses and consumers around the world.

ICFA rejects generalized characterizations of bottom trawling as inherently unsustainable or destructive.

The sustainability of a fishery should be assessed according to the status of the stocks, the impacts of the fishery, the effectiveness of its management and the measures in place to protect ecosystems — not simply according to the fishing gear employed.

Properly managed bottom trawl fisheries operate under science-based conservation and management measures, including measures designed to protect Vulnerable Marine Ecosystems, reduce bycatch and minimize impacts on benthic habitats. Fishing technologies and practices also continue to evolve to reduce environmental impacts and improve efficiency.

ICFA therefore encourages FAO to ensure that future analysis and policy advice concerning trawl fisheries is based on comprehensive scientific evidence and recognizes both environmental impacts and the important contribution of these fisheries to food production, employment and food security.

ICFA further supports continued FAO scientific work on the environmental, economic, social and food-security dimensions of bottom trawling so that international discussions are informed by objective and balanced evidence.

### **Aquatic foods, food security and climate change**

Aquatic foods make an essential contribution to global nutrition and food security and should be fully reflected in international food, biodiversity and climate policy.

Sustainable capture fisheries produce highly nutritious animal protein while supporting livelihoods and economic activity in coastal communities throughout the world.

ICFA welcomes FAO's continued work to strengthen the evidence base concerning climate change impacts on fisheries and to assist Members and RFBs in adapting fisheries management to changing ocean conditions.

Climate change will increasingly affect stock productivity and distribution, fishing operations and fishing communities. Adaptive, science-based management will therefore become even more important.

At the same time, policies addressing climate change should recognize the contribution that sustainably harvested aquatic foods can make to lower-emission food systems.

The seafood sector is also increasingly pursuing greater utilization of harvested fisheries resources and reducing waste through circularity initiatives that seek to maximize the value of the entire fish. These efforts can improve resource efficiency, reduce waste and support more sustainable seafood production and supply chains.

ICFA encourages FAO to continue promoting aquatic foods within international climate and food-security discussions and to support technological innovation that improves vessel efficiency, reduces emissions and strengthens the resilience of fisheries and seafood value chains.

### **Small-scale and large-scale fisheries**

ICFA recognizes the important contribution of small-scale fisheries to food security, employment and livelihoods and supports efforts to improve their sustainability and management.

At the same time, fisheries policy should avoid assumptions that sustainability is determined by the scale of a fishing operation.

Both small-scale and large-scale fisheries can be sustainable when effectively managed, and both can create environmental impacts when management is inadequate.

COFI should therefore promote effective, science-based management across **all fisheries**, while recognizing the different economic, social and operational characteristics of individual fisheries.

Large-scale fisheries make an important contribution to efficient seafood production, international seafood supply chains and global food security. Their contribution should be recognized alongside that of small-scale fisheries within FAO's Blue Transformation agenda.

### **FAO priorities**

The demands placed upon FAO's fisheries programme are increasing as fisheries become connected to an expanding range of international biodiversity, climate, trade and ocean governance agreements.

ICFA encourages Members to ensure that these growing responsibilities do not dilute FAO's fundamental role in improving fisheries management.

FAO has unique global expertise in fisheries science, statistics, management and governance. Maintaining and strengthening this capacity should remain a priority.

ICFA therefore encourages COFI37 to:

- reaffirm effective fisheries management as the foundation of sustainable fisheries;
- work toward bringing 100 percent of global fisheries under effective management;
- strengthen fisheries science, data collection, stock assessment and management capacity;
- provide adequate resources for FAO's work to combat IUU fishing;
- strengthen RFBs and RFMOs and recognize their central role in international fisheries governance;
- ensure FAO remains the authoritative fisheries voice in international biodiversity, climate, trade and ocean governance processes;
- recognize the contribution of both small-scale and large-scale fisheries to sustainable food production;

- recognize the important contribution of sustainably managed trawl fisheries to global seafood production and food security; and
- ensure that policies affecting fisheries remain grounded in sound science, effective management and the principle of sustainable use.

ICFA looks forward to continuing to work with FAO, its Members and other stakeholders toward fisheries that sustainably nourish a growing global population while conserving the marine ecosystems upon which fisheries and fishing communities depend.

For further information visit the ICFA website at [fishcoalition.org](http://fishcoalition.org)

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