

TESTIMONY
OF
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BEFORE THE UNITED STATES CONGRESS
Congressional Executive Commission on China

DARK NETS, ILLICIT LABOR—CONFRONTING CHINA’S IUU FISHING AND SEAFOOD SUPPLY CHAIN

I. OPENING STATEMENT

Distinguished Members of the Commission: thank you for the opportunity to testify. My name is Scott Clendenin. I am a retired Rear Admiral from the United States Coast Guard, where I last served as Assistant Commandant for Response Policy. I am here in my personal capacity today, but also as a Senior Advisor to the recently published World Wildlife Fund’s and International Conservation Caucus Foundation’s report *The Geopolitics of the Ocean: Why healthy seas are vital to America’s national security*. It brings together data, analysis, and first-hand perspectives from five former senior national security officials — including two U.S. Ambassadors, a former Acting National Oceanic and Atmospheric Administration (NOAA) Administrator, and the 26th Commandant of the U.S. Coast Guard – all of whom have served the nation in high level leadership positions for decades.

It is important to note up front that my opinions and views expressed in my testimony are my own and in no way reflect the official position of the U.S. Government, U.S. Coast Guard, the World Wildlife Fund, or any other organizations.

I want to be direct with this Congressional Commission -- Illegal, Unreported, and Unregulated (IUU) Fishing is much more than a fisheries management or conservation problem. IUU Fishing is a national security crisis that fuels conflict and transnational organized crime; it finances cartels; enables arms and drug smuggling; is intertwined with human trafficking and forced labor;

undermines the sovereignty of our allies while directly defrauding American consumers, and creates an unfair playing field for U.S. domestic fishermen who have to compete with illegally caught fish on the market.

The principal driver of IUU fishing is the People's Republic of China (PRC). Beijing has for decades conceived of and deployed a strategy to access, lay claim to, and dominate the global supply of seafood in order to exercise power around the world, including through [grey-zone operations](#) where its global fishing fleet is leveraged as a maritime militia. Beijing has used policy incentives, economic subsidies, and political encouragement for its distant water fishing fleet to fan out over the world to further PRC's natural resources and geopolitical interests. As Admiral Samuel Paparo, Commander, U.S. Indo-Pacific Command, has [stated](#): "Eight of the 10 world's worst IUU fishing violators are state-owned enterprises of the People's Republic of China...it has the potential to be a real driver of conflict." In short, our nation's action on IUU Fishing could determine whether we experience peace or conflict, security or instability, prosperity or economic challenges.

To that end, I am here to reaffirm that America is a maritime nation and that the ocean underpins our economic strength, our food supply chains, our strategic influence, and our homeland security. I am also here to urge our nation's elected officials to treat the governance of the ocean — and the enforcement against those who prey upon it — with the same strategic imperative that we bring to piracy, narcotics smuggling, energy security, rare earth minerals, and strategic competition with our adversaries.

II. IUU FISHING IS A NATIONAL SECURITY CHALLENGE

Let me begin with the scope of the problem. Under my tenure in the U.S. Coast Guard, we declared IUU Fishing to be the world's top maritime security challenge — surpassing piracy. The financial losses from IUU Fishing are estimated at 16 to 36 billion dollars annually. Estimates indicate that potentially up to one third of wild-caught seafood consumed in the United States is linked to illegal fishing. That is seafood on American dinner tables, in American restaurants, and in American grocery stores — caught illegally, often by forced labor, processed in opaque supply chains, and sold at a price advantage over the American fishermen who play by the rules. President Trump in

his recent Executive Orders on *Restoring American Seafood Competitiveness* and *Unleashing American Commercial Fishing in the Pacific* addressed this issue of fundamental fairness for our American fishermen. I agree with this assessment, and we need to meet this moment because this issue goes beyond economic unfairness to our domestic industry - it is a direct subsidy to criminal networks.

Many [sources](#) and initiatives documents how IUU Fishing is a driver of [conflict](#) and deeply intertwined with the most dangerous transnational threats America faces. For example:

- In the Indo-Pacific: China's distant-water fishing fleets dominate the maritime domain. Between 2011 to 2024, the region experienced 156 conflict events in the Pacific Islands in what amounts to regional conflict through the proxy of Coast Guards and fishing fleets. Now the tuna stocks are shifting eastward due to warming waters a trend likely to spark escalated conflicts.
- There are strong indications that distant water fishing fleets are involved in drug smuggling and other transnational crimes in our hemisphere. In 2018 two Chinese nationals were convicted in U.S. Federal District Court of narcotics smuggling following a U.S. Coast Guard Cutter interdiction of their fishing vessel with 900 kilos of Cocaine on the high seas in the Eastern Pacific.
- In 2023, the U.S. Navy seized over 2,000 AK-47 assault rifles from a Yemeni-crewed fishing vessel in the Gulf demonstrating how traditional fishing craft are used to arm Iranian funded proxies. These same types of fishing vessels are smuggling other illicit cargoes across Middle East waterways, serving to destabilize the region.
- Drug cartels — including Mexico's Gulf Cartel, a designated foreign terrorist organization — use fishing vessels to conduct drug and migrant smuggling operations along our southern maritime border. They also harvest red snapper and other commercially valuable species from U.S. waters, violating American sovereignty, stealing our natural resources, and exporting them back to the U.S. market for millions of dollars in cartel revenue.
- In the Gulf of California, the Sinaloa Cartel and Cartel Jalisco Nueva Generacion (CJNG) have systematically taken over the fishing industry — from individual fishermen, to cooperatives, to processing plants, and to exporters. The entire seafood value chains in some Mexican coastal communities are now under criminal control.
- And finally, **on the global level**, nearly two-thirds of countries assessed have documented cases of forced labor, child labor, or other human rights violations in their seafood supply chains. The International Labour Organization conservatively estimates more than 128,000 fishermen are trapped in conditions of forced labor worldwide, and Pew Charitable Trust estimates over 100,000 fishermen die each year on the sea, and that is likely an underestimate.

These examples highlight the types of public and semi-private networks we are allowing to profit when we fail to enforce traceability, transparency, and the rule of law across global seafood supply chains. It is through this lens that the strategic imperative for our maritime nation becomes crystal clear: how we, our allies, and partner nations meet the challenges posed by IUU fishing contributes to countering PRC's increased geopolitical and economic influence through natural resource extraction.

III. GEOPOLITICAL COMPETITION AND THE SEAFOOD BATTLEGROUND

Building on this, the Committee should understand that IUU Fishing is not merely a conflict and crime problem — it is an instrument of geopolitical competition.

The PRC has built vast distant-water fishing fleets that operate with state subsidies, with support vessels for refueling and at-sea processing, and with what can be described as deliberate strategic intent. These fleets operate in the waters of up to 93 countries. In some regions, as many as two-thirds of foreign fishing vessels operate with disregard for international and coastal state laws. Predatory practices such as AIS manipulation, shell company licensing, bribery, and transshipment at sea to launder illegal catch are widely documented across West Africa, South America, and the Western Pacific.

This is not fishing. This is economic coercion. These fleets are the maritime equivalent of the debt-trap infrastructure investments we have rightly flagged as threats, one example being China's controlling interest in Sri Lanka's Hambantota Port. These predatory practices are designed to secure strategic resource access, spread corruption, build dependencies, and extend influence over nations whose maritime economies are their primary national asset.

The consequences are already playing out in regions of direct U.S. strategic interest:

- In the Indo-Pacific, as noted above, Admiral Paparo, Commander of U.S. Indo-Pacific Command has warned that competition over fisheries has the potential to be a real driver of conflict. Research has found that the presence of foreign fishing vessels contributed to 45 percent of fisheries-related conflict events in the Pacific Island region. Small island nations — precisely the nations that we desire influence with — are being outcompeted and destabilized.
- In the Arctic, as ice recedes, pollock stocks are shifting from American Exclusive Economic Zone (EEZ) waters to those of Russia and other nations. The Alaskan pollock

fishery is worth nearly \$2 billion annually and supports approximately 30,000 American jobs. Foreign vessels — primarily fishing for this stock — are already crowding the U.S.-Russian maritime border, and the PRC continues to explore the Arctic declaring itself as a near-Arctic nation. Moreover, overhead surveillance and communications are at best difficult in the Arctic due to the physics of satellite orbits, so maritime presence and enforcement patrols are critical to preserve our sovereign interests. This need for persistent presence in the challenging Arctic operational environment is in part why the efforts of Congress to fund Polar Security Cutters (PSCs) and Arctic Security Cutters (ASCs) for the United States Coast Guard is so important to protecting U.S. interests in that region of increasing geo-strategic importance.

- In South America, Argentina has militarily engaged Chinese fishing fleets after discovering hundreds of vessels fishing illegally in its waters. Chinese distant water fishing fleets have lined the edges of exclusive economic zones around uniquely biodiverse ecosystems like the Galapagos Islands.
- Globally, fisheries-related conflict events have increased 20-fold since the 1970s. One in four militarized conflicts between democracies during the Cold War were over access to fisheries resources.

This is the strategic context in which IUU Fishing must be understood. As the United States has learned in the rare earth minerals context, it is not in America's interest to allow geostrategic competitors, like the PRC, to dominate access to critical natural resources. Seafood is no different.

IV. THE ECONOMIC STAKES FOR AMERICA

Let me also speak to the economic dimension, since both national security and commerce concerns vis-a-vis the PRC are in your purview as a Commission.

The U.S. blue economy — encompassing fisheries, maritime trade, shipbuilding, coastal tourism, and marine technology — is a powerful engine of American prosperity. The U.S. seafood sector alone is worth over \$320 billion and employs approximately 2.3 million Americans. The United States holds the second-largest marine territory in the world, however, 75 to 85 percent of seafood consumed in America is imported. That import dependence creates direct exposure to the very IUU Fishing-tainted, criminally controlled, and geopolitically manipulated supply chains I have just described. The scale of potential economic loss is significant: global estimates suggest over \$3 trillion in fisheries and aquaculture value is at risk over the next decade due to inadequate governance and overfishing.

The return on investment for getting this right is extraordinary. Every dollar invested in sustainable ocean resource management yields five dollars in return — through food security, economic stability, reduced enforcement costs, and preserved marine assets. Conversely, failing to act risks ceding strategic resources to competitors, empowering criminal networks, and undermining American global maritime influence.

V. THE MARITIME SAFETY ENFORCEMENT ACT AND WHAT MORE IS NEEDED

I would like to personally thank Congress for your leadership on this issue. The Maritime Security and Fisheries Enforcement Act — MSAFE — is a laudable initiative. It authorizes a whole-of-government approach for orchestrating and coordinating the efforts of 21 Department and Agencies to combat IUU Fishing, and it requires periodic progress update reports to Congress.

But while it creates a framework for progress, candor requires that I also note for this Committee that the working group initiatives established under MSAFE have received little dedicated funding, outside of internal agency reprogramming and modest budget increases, and their collective authority and expertise remain significantly underutilized. We all know that interagency coordination without the commensurate fiscal resourcing is not a strategy — it is principally an exercise in paperwork. Moreover, in my experience in government, if strategic joint and interagency initiatives in our government are not periodically reinvigorated by both Congress and the Executive Branch, they will naturally be relegated, or migrate, to bureaucratic channels at lower echelons of our government's Departments and Agencies.

Regional Fisheries Management Organizations (RFMOs) have strengthened monitoring, control, and surveillance; expanded IUU Fishing vessel lists and helped to improve transparency. However, their governing rules, forged around a model of consensus, often allow a single nation to block enforcement, including the authority to board, inspect, and sanction vessels, hence, they cannot obtain agreements on what could be the most effective treaty enforcement measures.

The U.S. Coast Guard has entered into diplomatic maritime agreements that enable combined operations with partner nations to counter IUU fisheries, and the service routinely conducts patrols focused in part on countering IUU fisheries. Congress has authorized the largest, and very needed,

acquisition effort in the history of the service including the Fast Response Cutters (FRCs) and Offshore Patrol Vessels (OPCs) that are critical to operations that counter IUU Fishing. However, it is critical to note that the actions of the U.S. Coast Guard at sea alone are insufficient to stem the tide of IUU Fishing.

To this end I recommend your commission consider three strategic shifts:

1. Reinvigorate American Maritime Governance Leadership

Maritime governance should be elevated in our nation's core security directives — National Security Directives, congressional strategic mandates, and our National Maritime Strategies. Coupling the elevation in importance, adequate resourcing mechanisms must enable enhanced domestic maritime governance and position the United States as a global leader on this front. The National Security Council plays an important role to develop and coordinate our IUU Fishing strategic efforts to ensure they embody a whole-of-government approach especially when they team with Congress and the Office of Management and Budget (OMB) resourcing those efforts. Resources to implement this strategy will allow American to protect, manage, enforce, and deter threats to our national maritime resources and to our international seafood supply chains and by extension our national security.

2. Protect America's Maritime Interests Through Alliances and Trade

In regions of strategic importance — the Indo-Pacific, Latin America, the Caribbean, and the Arctic — the United States must deepen collaboration with partners on maritime domain awareness, capacity-building for fisheries enforcement, fisheries management, and coalition efforts to counter IUU Fishing. Critically, this does not require new funding lines or programs. Resources from the State Department's Narcotics and Law Enforcement (INL) program and the Defense Security Cooperation (DSC) Fund can be authorized for this purpose — because IUU Fishing is, at its core, both a national security imperative and a transnational organized crime criminal challenge.

Experience in recent years shows that maritime presence, transparent documentation of violations, and coordinated diplomatic messaging can change IUU Fishing fleet behavior. More powerfully, when multiple nations act together — sharing evidence and issuing demarches — states with IUU

Fishing linked fleets often adjust their actions. This approach has proven effective in West Africa, the Eastern Pacific, and the South China Sea.

Regional Fisheries Management Organizations need to find a way to evolve or mature from diplomatic coordination bodies into more intentional actors supporting fisheries treaty enforcement and compliance coordination mechanisms, enabling the levying of consequences for violations of international fisheries agreements and non-adherence to accepted standards for rules-based order at sea. I recognize given the diplomatic realities that they face this is easier said than done, however, in the face of shared national security concerns throughout history the international community has agreed to powerful enforcement regimes — for piracy, the slave trade, and narcotics trafficking — a similar approach is needed to address IUU Fishing and the associated crimes.

Finally, we must lead international coalitions to ensure global seafood traceability, transparency in foreign access and trade agreements, and import controls/market access requirements for catch information that can document legal origin. These tools exist and have been exercised at times. What is missing is the political emphasis to deploy them consistently. This hearing is an indication that this is about to change, and I commend you for it. Traceability is optimized when paired with data-driven fisheries management. The U.S. has the best managed fisheries in the world.

Our Regional Fisheries Management Councils balance the interests of fishermen, seafood markets, marine biologists, and politicians creating a regulatory framework that levels the playing field for all. Sharing our technical expertise, governance process, and enforcement regime with partner nations to improve fisheries data collection and management would help to address the root causes of IUU Fishing: Ungoverned fishing of too few fish in the ocean in an unsustainable manner.

3. Strengthen Public-Private Partnerships in a Whole-of-Society Effort

Even with all the international efforts I have enumerated, IUU Fishing persists at scale. We cannot only interdict or regulate our way out of this challenge, and the solutions lie beyond the actions of any single government or entity. The reality is that a whole-of-society response with broad partnership is needed to address IUU Fishing that aligns market forces, industry, technology, diplomacy, maritime enforcement, regulation, and civil society.

If major importers of seafood— including the United States, Japan, Australia, and the European Union — collectively sanctioned companies engaged in IUU Fishing activity, the financial incentive for IUU Fishing would dramatically reduce.

U.S. Departments and Agencies are collectively increasing efforts to improve seafood traceability to prevent importation. There have been episodic successes through innovative interagency law enforcement and customs investigations. As an example, Operation JADE SPEAR, a U.S. interagency effort, demonstrated the power of combining law enforcement investigation, customs enforcement, and coordinated financial actions that resulted in the delisting of IUU Fishing linked companies from the NASDAQ Stock Exchange. Interpol has also established a program to coordinate international investigations into IUU Fishing criminal networks and activity. These enforcement efforts need to be replicated and conducted at a much larger scale.

Industry also has a critical role to play in eliminating IUU Fishing from their supply chains. A unified and impactful commitment to traceability is needed to transform global seafood supply chains. A good example is the “dolphin safe tuna” movement in the 1990s, which increased the awareness of industry, government, and the public about the deaths of dolphins that occurred during tuna fishing and developed fishing practices to prevent that from happening. Companies are exploring how a similar industry wide effort could be used to illuminate and prevent IUU Fishing from unwittingly existing in their supply chain.

Non-Governmental Organizations (NGOs) serve as an underutilized force multipliers in this mission set that could be better leveraged by government and international organizations through increased communication and engagement with the NGO community. Often NGOs do not require U.S. government funding or support because they operate on philanthropic donations. They desire better partnership with U.S. Departments and Agencies to ensure that their efforts are complementary and not redundant to U.S. efforts to counter IUU Fishing activity.

The MSAFE Act has helped to better coordinate the IUU Fishing capacity building efforts of U.S. Departments and Agencies; however, U.S. capacity building efforts should now be better synchronized across agencies, allies, NGOs, and international organizations who are involved in similar capacity building efforts. To build the requisite capacity to counter IUU Fishing activity, partner nations need coordinated support in law and policy frameworks, maritime domain awareness, intelligence sharing, enforcement, customs, and traceability.

Emerging technologies in industry are critical as well — including low-cost uncrewed aerial systems (UAS), lower cost patrol vessels, commercial satellite data, and AI analytics — which have served to dramatically reduced cost of monitoring EEZs for developing nations. Creating sustained offshore presence and awareness in a nation’s territorial sea, whether through patrols, ship rider agreements, UAS surveillance or multinational operations, remains the essential objective.

Emerging UAS capability technologies provide the ability for developing nations to overcome the financial barrier-to-entry for effective maritime security by replacing very costly traditional manned maritime patrol aircraft programs with much lower cost and lower risk UAS systems. These systems can now remain airborne for over a day and cover a nation’s territorial sea and EEZ and provide the ability to share ubiquitous surveillance data enhanced by AI capabilities to operators and analysts ashore to document IUU Fishing incursions and activities in and around their waters. Moreover, industry now also offers mission enablers such as Starlink with lower cost communication and good bandwidth which enables most nations to afford access to IUU Fishing monitoring information and intelligence at sea.

It is important to note that nations do not always need to board IUU Fishing vessels to be effective. UAS or boat crew photos and documentation that enable detailed diplomatic demarches to be sent to the offending flag state of the IUU Fishing fleets can be just as compelling as a seizure at sea with the same desired effect -- compelling a modification of behavior and conformance to accepted maritime rules-based order.

Similarly, least developed countries often do not have sufficient maritime law enforcement vessels to operate hundreds of miles offshore for lengthy periods of time. Recent innovative and lower cost approaches to at-sea maritime law enforcement that have been used by NGOs in Central America can be adopted for use in Oceania, Africa, South America as well. Traditional navy and coast guard ships and patrol boats are very expensive to acquire and operate, but unlike complicated and risky high-speed interdictions of go-fast drug trafficking vessels often at night, least developed countries do not need fast interdiction platforms to counter IUU Fishing vessels and activity in and around their waters. Instead, effective enforcement operations can be accomplished with used offshore supply vessels, which can be repurposed to serve as a mother ship or a floating station - with plenty of fuel, endurance over 30 days, berthing for multiple

boarding teams and 2-4 interceptor boats and crews. This “wolf pack” operational approach can be operated at a fraction of the cost of operating typical offshore navy or patrol vessels.

Combatting IUU Fishing will require these types of innovative approaches and a departure from our traditional U.S. regional engagement business models to maintain affordable at-sea persistent presence to catch IUU Fishing violators in the act.

The private sector — including NGOs and industry partners— can serve as critical force multipliers for U.S. government capacity building efforts. Expanded collaboration and explicit authorization for these partnerships would yield significant returns.

VI. CLOSING

Members of the Commission: Our ocean fisheries resources have historically been treated as a conservation issue, separate from geopolitics and national security. That approach has not been effective. The threats I have described today — from IUU Fishing tied to cartels and arms smuggling, to state-subsidized distant-water fleets advancing China’s influence in our own hemisphere — are not future threat or national security risks. They are present and growing.

The health and sustainability of our ocean resources, our nation’s enforcement of the laws that govern it, our efforts to partner with allies on maritime governance, and our efforts to build the capacity of nations to combat IUU Fishing in and around their waters is inseparable from American maritime strength. The opportunity before this Congress is to reframe ocean governance as the strategic imperative it is — and to fund, staff, and direct the agencies towards whole-of-society partnerships that can meet this challenge.

I am grateful for the Commission’s time and attention to this matter, and I look forward to your questions.

— End of Testimony —