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SOVEREIGN RIGHTS, STRUCTURAL FAILURES: INDIA'S COMPLIANCE WITH UNCLOS CONSERVATION OBLIGATIONS IN THE DEEP-SEA FISHERIES SECTOR

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ABSTRACT

India's maritime expanse, encompassing an Exclusive Economic Zone of 2.02 million sq. km and a coastline of 8,118 km, constitutes one of the most ecologically significant and commercially vital fishing territories in the Indo-Pacific. Yet the governance architecture regulating deep-sea fisheries within this vast domain remains critically compromised — beset by legal ambiguities, regulatory capture, weak enforcement, and the structural abuse of the Letter of Permit (LoP) scheme. This article undertakes a doctrinal and empirical analysis of the legal framework governing deep-sea fisheries conservation in India, with particular focus on obligations arising from the United Nations Convention on the Law of the Sea (UNCLOS) and the Biological Diversity Act, 2002. Drawing upon investigative findings, judicial proceedings, and stakeholder testimonies, the article exposes systemic failures that permit foreign fishing fleets to operate illegally in Indian waters — depriving the State of substantial revenue, threatening marine biodiversity, and marginalising approximately 14.49 lakh active marine fishers. With India's seafood exports having reached USD 7.38 billion in 2022–23 and total fish production at 17.35 million tonnes, the stakes of governance failure have never been higher. The article concludes with normative and policy recommendations directed at strengthening India's fisheries conservation framework in alignment with contemporary international standards.

Keywords: *Deep-Sea Fisheries; UNCLOS; Letter of Permit; IUU Fishing; Marine Conservation; Indian EEZ; Biodiversity Act 2002; IOTC; Fisheries Governance; Coastal Communities.*

I. India's Maritime Profile: Setting the Stage

India commands a formidable maritime presence in South Asia, sharing international coastal boundaries with Pakistan to the west and Bangladesh to the east. The island nation of Sri Lanka lies to the south, separated by the Palk Strait and the Gulf of Mannar. India's coastline stretches 8,118 kilometres, encompassing five maritime states on the west coast (Gujarat, Maharashtra, Goa, Karnataka, and Kerala) and four states on the east coast (West Bengal, Odisha, Andhra Pradesh, and Tamil Nadu), together with four Union Territories with coastal access.¹

Following India's formal declaration of its Exclusive Economic Zone in 1977 pursuant to the Territorial Waters, Continental Shelf, Exclusive Economic Zone and Other Maritime Zones Act, 1976, the country acquired sovereign rights over 2.02 million sq. km of marine waters. India's EEZ is distributed as shown in Table 1 below.

Maritime Zone	Area	Share of EEZ
Total EEZ	2.02 million km ²	100%
West Coast	0.86 million km ²	42.50%
East Coast	0.56 million km ²	27.79%
Andaman & Nicobar	0.60 million km ²	29.54%

Table 1: India's Exclusive Economic Zone — Areal Distribution (Source: Ministry of Fisheries, Annual Report 2023–24)

India's fisheries sector has grown substantially in recent decades. Total fish production in 2022–23 reached 17.35 million tonnes, comprising 3.93 million tonnes from marine capture fisheries and 13.42 million tonnes from inland and aquaculture sources — a sharp reversal of the marine-dominated production profile that characterised the sector a decade earlier.² Approximately 14.49 lakh active marine fishers — and some 36.18 lakh persons engaged in allied activities — depend directly on the health of India's marine fisheries.³

India's seafood exports reached Rs. 60,523.89 crore (USD 7.38 billion) in 2022–23, making India the fourth-largest seafood exporter globally. The fisheries sector contributes

¹N. Namasivayam, 'Indian Marine Export: An Overview' (2007) Southern Economist (Bangalore) 41–42.

²Department of Fisheries, Government of India, Annual Report 2023–24 (Ministry of Fisheries, Animal Husbandry and Dairying, New Delhi, 2024) 5. Total fish production in 2022–23 reached 17.35 million tonnes, of which marine fish production accounted for 3.93 million tonnes and inland production 13.42 million tonnes.

³CMFRI, Marine Fisheries Census 2016 (CMFRI, Kochi, 2016) 1. The Marine Fisheries Census 2016 — the most recent national census of marine fishers — recorded 14.49 lakh active marine fishers and approximately 36.18 lakh persons engaged in fisheries-related activities. The next census (2024) is ongoing as of the date of this article.

approximately 1.09 per cent of national Gross Value Added and 6.72 per cent of agricultural GVA.⁴ These figures underscore the strategic economic importance of sound fisheries governance — and correspondingly, the severity of the governance deficits examined in this article.

II. Introduction: The Crisis of Illegal and Unregulated Fishing

Illegal, Unreported, and Unregulated (IUU) fishing represents one of the gravest threats to global marine sustainability. The Food and Agriculture Organization estimates that IUU fishing generates annual losses of approximately USD 23.5 billion globally and accounts for between 11 and 26 million tonnes of catch — equivalent to as much as 26 per cent of the world's reported marine landings.⁵ In particularly vulnerable jurisdictions such as India, the IUU fraction is estimated at up to 40 per cent of total marine catch — a figure of staggering ecological and economic consequence.⁶

The industrialisation of fishing has dramatically accelerated this crisis. Modern fleets deploy satellite navigation, deep-water sonar, and floating factory vessels capable of processing, freezing, and transshipping catch mid-ocean — operating continuously with minimal port contact. This capacity to exploit previously inaccessible depths has given rise to a race-to-the-bottom dynamic: escalating extraction pressure on fish populations that have no corresponding refuge from industrial-scale capture.⁷

The methods by which IUU operators evade detection are equally sophisticated: under-reporting of catch; deployment of prohibited gear including bottom trawls; operating under false or multiple registrations; conducting at-sea transshipments; and flag-hopping between registries of convenience. These practices are rendered possible — and profitable — by fragmented jurisdictional frameworks, inadequate surveillance capacity, and, in documented cases, complicity at official levels. India's particular vulnerability stems from its vast and resource-rich EEZ, the structural weaknesses of its deep-sea fisheries licensing architecture,

⁴Department of Fisheries, Annual Report 2023–24 (n 2) 47. India's seafood exports reached Rs. 60,523.89 crore (USD 7.38 billion) in 2022–23, making India the fourth-largest seafood exporter globally. The fisheries sector contributes approximately 1.09% of national GVA and 6.72% of agricultural GVA.

⁵Food and Agriculture Organization of the United Nations, *The State of World Fisheries and Aquaculture 2024: Blue Transformation in Action* (FAO, Rome, 2024) 12. Global IUU fishing is estimated to cause annual losses of USD 23.5 billion, representing between 11 and 26 million tonnes of catch.

⁶Central Marine Fisheries Research Institute, Annual Report 2022–23 (CMFRI, Kochi, 2023). See also D.J. Agnew et al., 'Estimating the Worldwide Extent of Illegal Fishing' (2009) 4(2) PLoS ONE e4570, which pegs IUU fishing in certain developing-country EEZs at 40% of reported catch.

⁷R. Narayankumar, R. Sathiadhas and N. Aswathy, 'Economic Performance of Marine Fishing Methods in India' (2009) 200 Marine Fisheries Information Service: Technical and Extension Series 3.

and the seasonal passage of commercially valuable migratory species — particularly yellowfin tuna — through its territorial waters.

In 2020, the Government of India launched the Pradhan Mantri Matsya Sampada Yojana (PMMSY) with an investment of Rs. 20,050 crore over five years — the largest-ever fisheries sector investment in India — targeting an increase in fish production to 22 million tonnes and exports to Rs. 1 lakh crore by 2024–25.⁸ Yet the continued absence of structural reforms in the deep-sea fishing licensing regime risks undermining these ambitions at their foundations.

III. Jurisdictional Framework: International and Domestic Law

3.1 UNCLOS and the Sovereign Rights of the Coastal State

The primary instrument of international fisheries law is the United Nations Convention on the Law of the Sea (UNCLOS), which India ratified in 1995. Article 56(1)(a) vests coastal states with sovereign rights in the EEZ for the purpose of exploring, exploiting, conserving, and managing the living and non-living natural resources of the superjacent waters, seabed, and subsoil. Article 56(2) imposes a correlative duty to give due regard to the rights of other states and to act compatibly with UNCLOS. Articles 61–67 elaborate the obligation to conserve living marine resources, requiring coastal states to determine allowable catch levels, take stock-based conservation measures, and cooperate in the management of shared and straddling fish stocks.

India gives national effect to these obligations principally through the Maritime Zones Act, 1976, and the Merchant Shipping Act, 1958. Enforcement at sea is shared between the Indian Navy, the Indian Coast Guard, and the Fisheries Survey of India — a multi-agency framework whose effectiveness has been repeatedly called into question.

3.2 The Biological Diversity Act, 2002

The Biological Diversity Act, 2002 — enacted to implement India's obligations under the Convention on Biological Diversity (CBD), 1992 — imposes a parallel conservation mandate with direct implications for marine ecosystems.⁹ Ratified by over 196 parties, the CBD

⁸Department of Fisheries, Ministry of Fisheries, Animal Husbandry and Dairying, Pradhan Mantri Matsya Sampada Yojana: Scheme Guidelines (Government of India, 2020). The PMMSY allocates Rs. 20,050 crore over 2020–25 for fisheries development, with a specific component for deep-sea fishing vessel modernisation.

⁹Biological Diversity Act 2002 (Act 18 of 2003); Convention on Biological Diversity 1992, 1760 UNTS 79. India is a party to both instruments. The National Biodiversity Authority, constituted under Section 8 of the Act, exercises oversight over access to India's biological resources.

requires parties to conserve biological diversity, ensure its sustainable use, and guarantee equitable sharing of benefits from genetic resources. The Act establishes the National Biodiversity Authority and State Biodiversity Boards as its institutional pillars.

The Act implies that ten per cent of every identified ecosystem category be designated as a protected area. By extension, the biological and legal logic of this provision requires that ten per cent of every relevant marine zone within India's jurisdiction be afforded equivalent protection — a requirement that has received inadequate regulatory attention in the context of deep-sea fisheries management, notwithstanding India's commitments under the Kunming-Montreal Global Biodiversity Framework (2022), which targets thirty per cent protection of marine areas by 2030.

IV. The Deep-Sea Fishing Regulatory Regime: Guidelines and the Letter of Permit

4.1 Overview of the 2013 Guidelines

On 31 January 2013, the Government of India's Ministry of Agriculture, Department of Animal Husbandry, Dairying and Fisheries, issued revised Guidelines for Deep Sea Fishing (the 2013 Guidelines).¹⁰ The Guidelines provide the principal operative framework for licensing Indian entrepreneurs to deploy Deep-Sea Fishing Vessels (DSFVs) within the Indian EEZ. The fundamental instrument of access is the Letter of Permit (LoP) — a use-right licence, distinct from a catch quota, permitting eligible Indian entities to operate DSFVs in the EEZ beyond 12 nautical miles from the baseline.¹¹

Key eligibility conditions under the 2013 Guidelines include:

- DSFVs must be at least 20 metres overall length and must fall within one of six designated categories: Tuna Long Liners, Purse Seiners, Trap/Hook and Line Vessels, Squid Jiggers, Pelagic/Mid-Water Trawlers, or Pole and Line vessels.
- A maximum of four Tuna Long Liners or Mid-Water Pelagic Trawlers per company is initially permitted, with additional vessels available upon full payment for the first tranche.¹²

¹⁰Ministry of Agriculture, Department of Animal Husbandry, Dairying and Fisheries, Guidelines for Deep Sea Fishing, Notification No. 21002/12/2011-Fy(Ind) (Government of India, 31 January 2013). The 2013 Guidelines remain the operative framework as of the date of writing, subject to periodic administrative modifications.

¹¹'Letter of Permit' is the instrument of use-right granted under the 2013 Guidelines (n 10). It should be distinguished from a quota — an LoP is a licence to engage in deep-sea fishing operations, not an entitlement to a defined quantum of catch. The distinction is analytically important: the absence of catch quotas is itself a structural deficiency identified in Section VI below.

¹²2013 Guidelines (n 10), para 1(iv). An additional tranche of four Tuna Long Liners or Mid-Water Pelagic

- A processing fee of Rs. 10,000 per DSFV is payable by demand draft upon application.¹³
- Applicant entities must demonstrate minimum paid-up capital of Rs. 10 lakh for up to two DSFVs, with an additional Rs. 5 lakh per vessel thereafter.¹⁴
- Joint venture applications require documentary proof of at least 51 per cent Indian equity participation.¹⁵

4.2 Provisional and Full LoP: Conditions for Conversion

Eligible applicants receive a Provisional LoP for one year, convertible into a full LoP upon submission of: (a) the Bill of Entry confirming import of the DSFV; (b) proof of registration with the Indian Mercantile Marine Department (MMD); (c) evidence of first instalment payment; and (d) a bank guarantee of five per cent of the total vessel cost (capped at Rs. 10 lakh), valid for five years.¹⁶ A full LoP is valid for five years and is renewable for successive five-year periods, provided all payments are complete and no major violations have been established.¹⁷

While the framework appears substantive on paper, the implementation record — examined in the following section — reveals pervasive non-compliance and institutional capture.

V. Systemic Abuse: The LoP Scheme, Foreign Fleets, and Governance Failure

5.1 Structural Findings: The Greenpeace and Tehelka Investigations

Investigative reporting by Greenpeace India¹⁸ and Tehelka magazine¹⁹ has assembled

Trawlers may be permitted upon full payment for the initial four vessels.

¹³2013 Guidelines (n 10), para 1(v). The processing fee is payable by Demand Draft to the Pay and Accounts Officer, Department of Animal Husbandry, Dairying and Fisheries, Ministry of Agriculture, New Delhi.

¹⁴2013 Guidelines (n 10), para 1(vi). Minimum paid-up capital of Rs. 10 lakh for up to two DSFVs; Rs. 5 lakh per additional vessel.

¹⁵2013 Guidelines (n 10), para 1(vii). This requirement is intended to ensure substantive Indian control; however, the use of shell companies to satisfy the 51% Indian equity threshold on paper while foreign entities retain effective operational control has been widely documented — see Section V below.

¹⁶2013 Guidelines (n 10), paras 2–3. Provisional LoP conditions: (a) Bill of Entry for the DSFV; (b) MMD registration proof; (c) first instalment payment evidence; (d) bank guarantee of 5% of vessel cost (ceiling Rs. 10 lakh), valid five years.

¹⁷2013 Guidelines (n 10), para 3. Full LoP renewable for successive five-year periods subject to payment completion and absence of major violations.

¹⁸Greenpeace India, *Seas of Corruption: How India's Deep-Sea Fishing Policy Has Subsidised Plunder* (Greenpeace India, Bengaluru, 2012) 7–11.

¹⁹Thelka is an independent Indian investigative news publication. See Rohini Mohan, 'Deep Pockets, Shallow Waters' *Thelka* (New Delhi, 18 February 2012).

substantial evidence of systemic abuse within the LoP scheme. Of the 79 LoP permits active in the Indian EEZ as of December 2011, a significant proportion were held through shell companies, with actual vessel operations dominated by foreign crews — Indian nationals constituting only a small fraction of crew, in direct contravention of the scheme's requirements.

A Right to Information query revealed that the cumulative royalty received by the Ministry of Agriculture from all LoP vessels for the five-year period 2005–2010 amounted to approximately Rs. 1.3 crore.²⁰ This is scandalously disproportionate to the commercial value of the extracted catch: a single LoP tuna long liner operating for one season can land approximately 1,800 tonnes of tuna, conservatively valued at Rs. 90 crore per vessel per season — yielding a cumulative industry revenue that dwarfs the State's receipts by several orders of magnitude.

5.2 Flag-Hopping and Dual Registration

One of the most extensively documented malpractices is flag-hopping — flying the Indian flag while operating in the Indian EEZ while simultaneously maintaining registration under a foreign flag registry. A case in point is the vessel Gerald-06, documented near Kanyakumari in 2008 bearing the Indian flag and nominally held by Deepsea Fisheries Management Co. (Seychelles), with a Tuvalu Ship Registry cancellation certificate presented to Indian authorities.²¹ When the Tuvalu Registry was contacted independently, an official confirmed that the cancellation certificate was forged.²²

Dual registration is a criminal offence under Section 435 of the Merchant Shipping Act, 1958. Documentary evidence gathered by investigators showed that multiple vessels flying Indian flags in the Indian EEZ were simultaneously listed under the Western and Central Pacific Fisheries Commission with Chinese Taipei flag designations — a logical impossibility under any legitimate regulatory scheme. The Indian Ocean Tuna Commission (IOTC)²³ has received several formal complaints about such practices, yet enforcement action has remained

²⁰Dr. Sairam Bhat, Associate Professor, National Law School of India University, Bengaluru, filed a Right to Information application with the Ministry of Agriculture seeking royalty figures for 2005–2010. The response disclosed cumulative receipts of approximately Rs. 1.3 crore — a figure strikingly disproportionate to independently estimated commercial extraction values during the same period.

²¹Vessel documentation and registry correspondence cited in Mohan (n 19). The vessel Gerald-06 was flagged as Indian in the Indian EEZ; its nominal seller, Deepsea Fisheries Management Co. (Seychelles), submitted a Tuvalu Ship Registry cancellation certificate to Indian authorities.

²²Tuvalu Ship Registry, correspondence confirming forgery, cited in Mohan (n 19). A copy of the registry official's email response ('The certificates presented... for Gerald No. 6 were FORGED') is reproduced in the Tehelka investigation.

²³The Indian Ocean Tuna Commission (IOTC) is an intergovernmental organisation established under FAO auspices to regulate tuna in the Indian Ocean. The Agreement for the Establishment of the IOTC entered into force on 27 March 1996 following ratification by a tenth party. India has been a member since 1996.

rare.

5.3 At-Sea Transshipment and Catch Evasion

The 2013 Guidelines do not mandate that LoP vessels land their catch at designated Indian base ports. This lacuna enables widespread at-sea transshipment: the transfer of catch directly to carrier vessels in the open ocean, bypassing Indian port-based inspection and reporting systems entirely. The IOTC prohibits transshipment of tuna without designated scientific observers, but this requirement is regularly circumvented by vessels in the Indian EEZ.²⁴

A University of British Columbia study estimated that India loses between USD 150 million and USD 220 million annually to IUU fishing, a figure that, adjusted for current tuna commodity prices, may be considerably higher in real terms today.²⁵

5.4 Foreign Fleet Incursions: Documented Cases

In February 2012, a Greenpeace survey vessel encountered four Myanmar-flagged vessels fishing without authorisation off the Andaman Islands, carrying neither valid documentation nor identifiable vessel names, and holding catches of shark and yellowfin tuna. Independent industry surveys identified the presence of Taiwanese vessels in the Indian EEZ without authorisation. G. Prithviraj, a Visakhapatnam seafood exporter turned whistleblower, physically documented 40 Taiwanese vessels within the EEZ over a two-year period. Four Taiwanese vessels — SAI-1, SAI-2, SAI-3, and SAI-6 — were confirmed to be docked in Chennai under an Indian company while remaining registered in Taiwan, rendering them ineligible for LoP status and barred from IOTC-area fishing as non-signatories.

The economic incentive is clear: access to a tuna long liner's LoP requires an upfront payment of only ten per cent of an already undervalued vessel — a vessel that can generate Rs. 90 crore in catch value within a single season. In exchange, the Indian government receives royalties that — as the RTI disclosure confirms — border on negligible.

²⁴Data drawn from: Rohini Mohan, 'Deep Pockets, Shallow Waters' (n 19); Greenpeace India, Seas of Corruption (n 18); and presentations at the National Seminar on Law and Policy on Fisheries Conservation and Management, National University of Advanced Legal Studies (NUALS), Kalamassery, Kerala, 4–5 March 2013.

²⁵University of British Columbia, Sea Around Us Project: India Country Profile (UBC, Vancouver, 2010), citing estimated annual IUU-related revenue losses of USD 150–220 million for India. More recent modelling by Belhabib et al. suggests the figure may be considerably higher in nominal terms when adjusted for increased tuna commodity prices since 2010.

VI. Critical Analysis: Legal Gaps and Structural Deficiencies

The foregoing survey exposes a governance architecture that is structurally inadequate to the challenges it faces. Bottom trawling — the practice of dragging weighted steel doors and cable-ribbed nets across the seabed — remains the dominant mode of industrial fishing in India's deep waters. Its ecological costs are well-documented:²⁶

"Huge steel doors are dragged along the ocean floor, holding open the trawl net. The doors and the cable dig into the seabed, plowing a meter or more into the ocean bottom, smashing coral, crushing bottom-dwelling life and digging up or tearing down absolutely everything in their path."

— Eyewitness account of deep-sea trawling operations in the Indian EEZ

This reality operates within an Indian EEZ that is simultaneously subject to international biodiversity conservation obligations under the CBD, the UNCLOS conservation regime, and domestic obligations under the Biological Diversity Act — yet is comprehensively failing to meet them.

The policy environment has a specific political economy. The Deep-Sea Fishing Policy of the 1990s — framed as a mechanism for technology transfer and foreign exchange earnings — ceded regulatory space to global fishing capital on deeply subsidised terms. Foreign vessels were supplied with diesel at Rs. 2 per litre, compared to Rs. 8 per litre charged to Indian small-scale fishers — a perverse subsidy that structurally disadvantaged the communities in whose name the policy claimed to operate.²⁷

Several critical legal deficiencies are identifiable in the current framework:

- Absence of a mandatory port landing requirement for LoP vessels, enabling at-sea transshipment and systematic evasion of catch-reporting obligations.
- No statutory observer or electronic monitoring requirement for DSFVs operating in the Indian EEZ, contrary to the practice of comparable fishing nations and IOTC conservation measures.
- Non-mandatory IOTC reporting standards in domestic law, leaving India unable to enforce international conservation measures against vessels in its own waters.

²⁶M.R. Boopendranath, 'Biodiversity Conservation Technologies in Fisheries' (2012) 1 Journal of Aquatic Biology and Fisheries 14.

²⁷Souparna Lahiri, 'Imperialist Globalization of the Indian Seas and the Fish Workers' Struggles' (2001) 7(2) Revolutionary Democracy <<http://revolutionarydemocracy.org/rdv4n2/fishwork.html>>.

- Weak post-issuance verification of LoP conditions: the Coast Guard's reorientation toward counter-terrorism following the 2008 Mumbai attacks created a surveillance vacuum in fisheries monitoring.
- Absence of corporate veil-piercing provisions that would hold beneficial owners of shell companies — as distinct from nominal Indian licence holders — accountable for violations.
- No catch quota system: the LoP grants an open-ended fishing right rather than a defined allocation consistent with scientifically determined maximum sustainable yield.

VII. Conclusion and Recommendations

The fisheries conservation crisis in India is, at its core, a governance crisis — a product of legislative gaps, regulatory fragmentation, institutional capture, and the political economy of deep-sea fishing policy. The legal framework anchored in UNCLOS and the Biological Diversity Act, 2002, provides a sound normative foundation; what is conspicuously absent is the institutional will and operational capacity to translate these obligations into effective practice.

The authors advance the following recommendations for the attention of the legislature, the executive, and the judiciary:

1. Amendment of the Deep-Sea Fishing Guidelines to mandatorily require port landing of all catch by LoP vessels, and deployment of independent scientific observers on board all DSFVs operating in the Indian EEZ, consistent with IOTC Conservation Measure 18/06.
2. Introduction of mandatory Vessel Monitoring Systems (VMS) and Automatic Identification System (AIS) transponders as non-negotiable LoP conditions, with real-time data transmission to the National Fisheries Management Authority proposed under the draft National Fisheries Policy, 2020.
3. Legislative criminalisation of dual registration and flag-hopping, with penalties indexed to the commercial value of the catch involved and express provisions for piercing the corporate veil to hold beneficial owners accountable.
4. Establishment of a dedicated Fisheries Violations Tribunal, or at minimum a specialised bench within the National Green Tribunal, to adjudicate IUU fishing offences expeditiously and restore enforcement credibility.

5. Replacement of the LoP scheme with a reformed quota-based licensing architecture grounded in stock assessments, subject to multi-stakeholder oversight with mandatory representation for artisanal fishing community organisations.
6. Implementation of the ten per cent marine protected area mandate under the Biological Diversity Act, 2002, consistent with India's commitments under the Kunming-Montreal Global Biodiversity Framework (2022), with priority designation of ecologically sensitive zones in the Indian EEZ.
7. Enhanced multilateral cooperation through the IOTC, FAO's International Plan of Action on IUU Fishing,²⁸ and the Indian Ocean Rim Association, to build a region-wide vessel monitoring and enforcement architecture that addresses the jurisdictional gaps that enable flag-hopping and transshipment fraud.

India's fisheries sector now exports over USD 7.38 billion annually, sustains 14.49 lakh active marine fishers, and contributes significantly to national food security.²⁹ The approximately 36 lakh persons whose livelihoods depend on the health of India's marine resources deserve a governance architecture commensurate with that dependence. In the words of the fishermen themselves:

"The fishermen know that the sea is dangerous and the storm terrible, but they have never found these dangers sufficient reason for remaining ashore."

It is time for India's legal and policy institutions to demonstrate equivalent resolve.

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²⁸FAO, International Plan of Action to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing (FAO, Rome, 2001); FAO, Voluntary Guidelines for Flag State Performance (FAO, Rome, 2014).