

An aerial photograph of ocean waves, showing white foam and deep blue water, running vertically along the left edge of the page.

FHAS Foundation
for Humanitarian
Action at Sea

Adrift

Coordination, capacity,
and data gaps in the
rescue of maritime
refugees and migrants

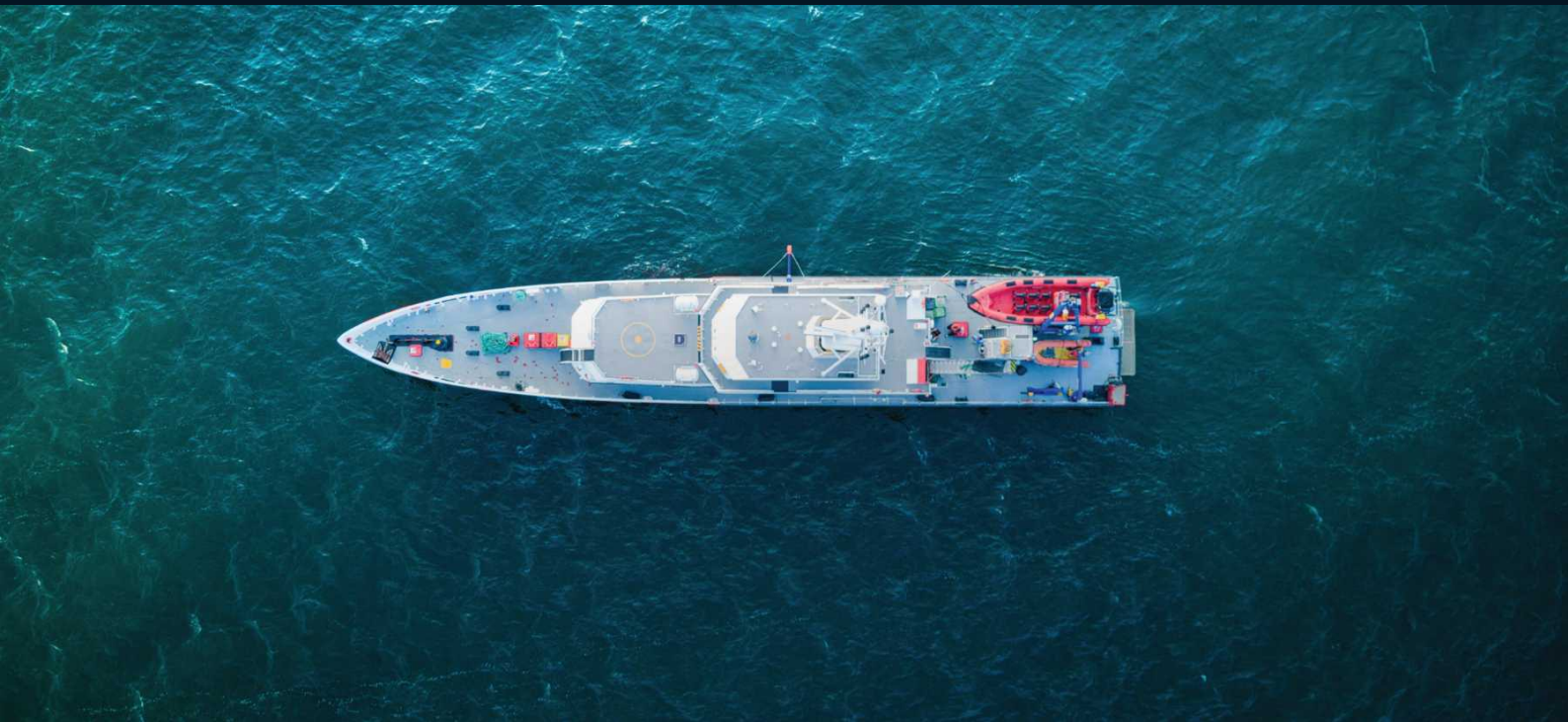
2026

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About us

The Foundation for Humanitarian Action at Sea (FHAS) is dedicated to protecting lives and rights at sea. It brings together the shipping industry, governments, search-and-rescue professionals, and international organisations to ensure that migrants, refugees, and seafarers receive safe and humane treatment. Through research, dialogue, and practical action, FHAS works to make the world's oceans safer.



This report was drafted by the Foundation for Humanitarian Action at Sea. It is the product of many engagements by FHAS over the past two years. Thanks go to all of the people and organisations that have made these twenty-four months productive, including the International Chamber of Shipping, the International Federation of Red Cross and Red Crescent Societies (IFRC), and the Maritime Search and Rescue Council, along with the many interlocutors that have attended and engaged with FHAS at dialogue meetings in Geneva, Senegal, Mauritius, and Singapore. Special thanks go to John Stawpert, Steve Wills, Matthew Schank, Sebastien Moretti, and Thomas Rostaing, for comments on the draft.

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Introduction

Since the consolidation of modern maritime law during the twentieth century, states have slowly built a global system of maritime search and rescue (SAR). The breadth and depth of this system can create the appearance of worldwide coverage and tight coordination, and along the coastlines of many high-income states, this is true. This system has pervasive and predictable gaps, however, including along routes travelled by refugees and migrants in parts of the world that receive little attention. This report explores four of those routes—the Western Indian Ocean, Northwest Africa, Gulf of Aden, and the Bay of Bengal / Andaman Sea—examining their unique dynamics and drawing lessons from their common challenges. A lack of coordination, operational capacity, and data collection and reporting recur as issues that demand to be addressed, which the final sections of this report focus on.

These waters also share the reality that they are regular trade routes as well as of movement of refugees and migrants by sea. From the Mozambique Channel to the Gulf of Aden to the Strait of Malacca, the sea lanes covered in this report are some of the busiest in the world. This nexus of maritime shipping and maritime migration is reflected in the reality of rescue: between 2023 and 2025, more than 600 commercial vessels were called upon to assist in the rescue of refugees and migrants in distress at sea.¹ This is more than one incident every two days, and it is not a complete accounting of all merchant vessel rescues. Across the ocean's vast expanse, merchant vessels are vital partners in search and rescue, and coordination with them is essential to saving lives at sea.

This report is the product of more than two years of work by the Foundation for Humanitarian Action at Sea (FHAS), during which time it has conducted dialogue platforms in Geneva, Mauritius, Dakar, and Singapore. In keeping with FHAS's practice, these conversations were closed door and are not cited within this report, but they inform its framing of the problem and exploration of potential solutions. This report is also the product of FHAS's involvement with a number of ongoing initiatives, including the Global Maritime Search and Rescue System Review, led by the International Maritime Rescue Federation (IMRF). FHAS has also worked to translate this engagement into practical cooperation and tools, including capacity-building support to national maritime authorities and the development of the Maritime SAR Tools reporting platform discussed later in this report.

¹ Global Maritime SAR System Review discussions (on file with FHAS).



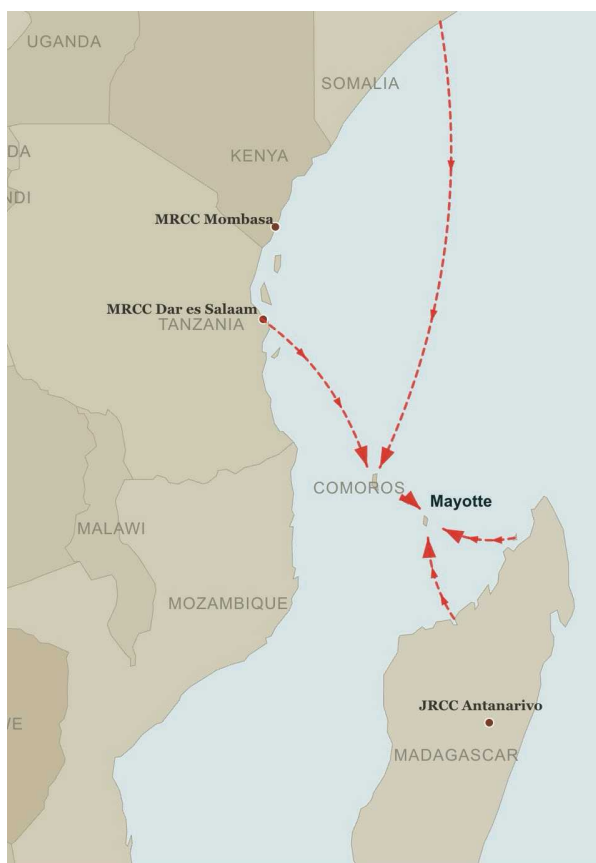
FHAS also conducted a short survey of six maritime rescue coordination centres (MRCCs) along the Western Indian Ocean, Northwest Africa, and Gulf of Aden routes, on basic coordination challenges. These surveys were similarly confidential, and their findings are only a snapshot, but aggregate responses are shared as supplementary evidence. Engagement with these actors supports the general findings of desk research on the issues of coordination, operational limitations, and data and reporting gaps.

This report begins with an overview of the SAR system, created by the UN Convention on the Law of the Sea (UNCLOS, 1982), the International Convention on the Safety of Life at Sea (SOLAS, 1974), and the International Convention on Maritime Search and Rescue (SAR Convention, 1979). This is a strong legal framework but, as argued below, many of its aspirations are met only along the coastlines of the world's high-income countries. Widely circulated SAR region (SRR) maps show the entire globe divided into interlocking zones of SAR responsibility. The International Maritime Organisation's (IMO's) own records tell a different story: many coastal states, including several that are central to the routes examined in this report, have neither declared a formal SRR nor registered an MRCC with the IMO.

It should be noted at the outset that this report focuses on issues of SAR and SAR coordination, including coordination of state assets as well as merchant shipping, but it does not focus on questions of disembarkation. The SOLAS and SAR Conventions are clear that disembarkation in a place of safety is an essential and constitutive element of rescue. Disembarkations remains politically contested by many states, however, and is the topic of many other policy reports and global discussions. Indeed, disembarkation can sometimes overshadow questions of rescue and rescue coordination. This report seeks to bring balance to these debates, while recognising the importance of disembarkation as a fundamental element of rescue.

Routes examined

The routes examined in this report are among the world's most active maritime migration corridors and among the least well served by existing SAR governance. The **Western Indian Ocean** route centres on the crossing between the Comorian island of Anjouan, itself linked to maritime routes from mainland Africa and Madagascar, and the French territory of Mayotte; it is one of the deadliest short crossings in the world. Despite multiple overlapping SAR regions, coordination is limited and capacity is low. Mortality estimates vary by an order of magnitude depending on the source.



Western Indian Ocean route

The **Northwest African Atlantic** route connects a broad arc of West African coastline with Spain's Canary Islands, with departures ranging from Morocco in the north to Guinea-Conakry in the south. Journeys can cover more than 2,000 kilometres of open ocean. There is a nearly tenfold difference in mortality estimates between major humanitarian organisations, reflecting both methodological differences and the fundamental challenge of counting deaths in largely unmonitored waters.

The **Bay of Bengal and Andaman Sea** route carries a population that is overwhelmingly Rohingya—a stateless ethnic minority fleeing persecution in Myanmar—from Myanmar and refugee camps in Bangladesh, to Indonesia and Malaysia, and occasionally India and Sri Lanka. Large swathes of this route lack IMO-notified SAR regions and routes taken are often distant from land.

The **Gulf of Aden** route connects the Horn of Africa with Yemen and onward to Saudi Arabia and the Gulf states, and is one of the world's busiest migration corridors. It is notable for a complete absence of formally registered SAR regions and MRCCs. It is also one of the most militarised routes, with multiple multinational naval coalitions operating in the strait, none of which include SAR as a priority mission.



Northwest African Atlantic route



Bay of Bengal and Andaman Sea route



Gulf of Aden route

Cross-cutting findings

Several findings emerge with consistency across all four routes and are developed in the body of this report. The global SAR system has gaps that are not reflected in publicly available maps or widely shared assumptions about the reach of the international maritime search and rescue architecture. Regional coordination frameworks exist along all four routes, but they approach maritime migration from the perspective of maritime security rather than rescue.

The operational capacity gaps on underserved routes are acute. The FHAS survey found that five of six responding MRCCs identified a lack of air and maritime resources as a coordination challenge; one had no dedicated rescue assets at all; and most operated with only one or two watch officers on duty. Communications infrastructure presents a parallel problem: five of six respondents reported coverage gaps in the Global Maritime Distress and Safety System (GMDSS) and difficulty reaching commercial vessels in their area of responsibility. These capacity deficits are concentrated on the routes where maritime migration mortality is highest. While some routes have international funding for maritime security, this funding does not make its way to supporting rescue.

As indicated in the widely varying estimates of fatalities along routes, data and reporting gaps are also a significant challenge. When rescues occur, there is no general reporting requirement, no common registry, and no mechanism for aggregating the substantial body of incident data that flag states, shipping companies, and MRCCs collectively hold. The mortality data on all four routes is characterised by wide uncertainty and significant probable undercounting.

Recommendations

Based on these findings, this report makes a set of four recommendations: (1) strengthen MRCCs through codifying standards and accountability; (2) strengthen inter-MRCC coordination through bilateral and multilateral agreements along specific routes; (3) strengthen national SAR systems, including MRCC capacity, through reinvigorated funding mechanisms; and (4) strengthen reporting through good industry practice and the use of a common data platform, such as Maritime SAR Tools (maritimesartools.com).

IMO & MEMBER STATES

01 **The IMO and its member states should elaborate baseline standards for national SAR systems, including MRCCs, and give national SAR systems greater attention in IMSAS audits.**

The IMO and its member states should elaborate baseline standards for MRCCs and give national SAR systems greater attention in IMSAS audits. MRCCs are too important to be governed only by the thin requirements of the SAR Convention and the non-binding guidance of the IAMSAR manual. While the resources and maritime traditions of different countries mean MRCC capacity will always vary, baseline requirements should be established. These requirements should also be assessed more regularly through the IMO Member State Audit Scheme (IMSAS). FHAS and the IMRF can meaningfully contribute to this process, respectively through convening dialogues and the Global SAR Review.

COASTAL STATES & PARTNERS

02 **Coastal states and relevant partners should strengthen regional coordination through bilateral and multilateral agreements.**

Coordination between countries can and should be strengthened through bilateral or multilateral agreements. Such agreements on SAR are widespread in high-income regions such as Western Europe; European coast guards have dozens of bilateral and multilateral agreements with one another, specific to search and rescue. The SAR Convention encourages these agreements, and the IAMSAR manual even includes template cooperation agreements between states. The many agreements on maritime security demonstrate that cooperation between the relevant states is achievable. The task now is to extend that same cooperative capacity to SAR specifically, an effort to which coastal states, multilateral maritime organisations, and the civil society community can all contribute, including through informal (track two) formats such as FHAS dialogues.

STATES, PARTNERS, AND THE PRIVATE SECTOR

03

States, multilateral organisations, and the private sector should strengthen operational capacity through dedicated funding.

Addressing the lack of operational capacity is a longer-term challenge but opportunities exist. Public authorities retain primary responsibility for SAR, an obligation under the SAR Convention that cannot be delegated, but their efforts can be supplemented by renewed donor support and by the private sector, which has a direct, practical, and humanitarian interest in stronger SAR systems given how often commercial vessels benefit from or are tasked with rescue or assistance operations. Donor states have established funds to support SAR capacity in the past but currently these funds are significantly under-resourced and maritime security funding has almost never translated into comparable investment in SAR. These efforts can and should be reinvigorated. FHAS and its partners are well placed to help map the options and precedents available for such a mechanism.

FLAG STATES, COASTAL STATES, AND THE SHIPPING INDUSTRY

04

Flag states, coastal states, and the shipping industry should work together to improve reporting on maritime rescue and utilise a common SAR data platform like Maritime SAR Tools.

To bridge the data gap, efforts can be made to strengthen reporting and consolidate information sharing. Reporting can be improved by both states and merchant vessels. Even non-binding standards and higher expectations of how MRCCs publicly report mass rescue data can significantly improve our understanding of maritime migration, and merchant vessel reporting through flag states can serve as both a source of information and a positive incentive. The Republic of the Marshall Islands' practice, discussed below, is worth building on.

A keystone element of improved reporting is a shared platform for SAR data. FHAS and the Maritime Search and Rescue Council have launched Maritime SAR Tools (maritimesartools.com) to fill this role. Such a platform can be developed iteratively and does not require universal buy-in from the outset to begin adding value.

An overview of the SAR coordination system

The law of the sea

A set of international treaties central to the modern maritime system—UNCLOS, SOLAS, and the SAR Convention—create a framework for search and rescue that can appear global, comprehensive, and seamless. The reality is more complex. Rather than establishing a global network of SAR actors, these treaties codify a set of well-established norms and create a set of state and individual obligations to facilitate them, but they also leave substantial details voluntary or vague. This results in gaps in the rescue architecture explored throughout this report.

Assistance to vessels in distress is recognized as a customary obligation and codified as legal duty in UNCLOS and SOLAS.² The SOLAS Convention creates an obligation on states to ‘ensure that necessary arrangements are made for distress communication and co-ordination in their area of responsibility and for the rescue of persons in distress at sea around its coasts’.³ The SAR Convention introduced the concepts of the maritime rescue coordination centre (MRCC) and search and rescue region (SRR),⁴ creating the framework for an integrated rescue network that seeks to cover the globe.

The importance of coordination

Coordination lies at heart of the SAR system. The sea is expansive and many distress events happen far from shore; there has never been a way for dedicated rescue organisations, like coast guards, to reach all distressed vessels in a timely way. This requires working with other states and other ships, including commercial vessels. This reality means that many rescues, and perhaps most rescues in international waters, are performed or assisted by merchant vessels.

Rescue is necessarily a joint effort and division of the international rescue duty requires cooperation. It is perhaps unsurprising, then, that the SAR Convention references coordination in no less than 16 key operational

² United Nations Convention on the Law of the Sea (UNCLOS) (1982) 1833 UNTS 3 https://www.un.org/depts/los/convention_agreements/texts/unclos/unclos_e.pdf; *International Convention for the Safety of Life at Sea (SOLAS)* (1974) 1184 UNTS 278 [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).

³ SOLAS, ch 5, reg 7.

⁴ The SAR Convention refers to rescue coordination centres (RCCs) rather than MRCCs, but the latter, maritime-specific term will be used in this report. See *International Convention on Maritime Search and Rescue (SAR Convention)* (1979) 1405 UNTS 97 <https://treaties.un.org/Pages/showDetails.aspx?objid=08000002800d43b3>, annex, ch 1.3.4, 1.3.5, 2.1.3, 2.1.4, 2.3.



provisions, and SOLAS includes coordination and communication requirements in more than half of its core rescue regulations.⁵

Coordination also comes to the fore because the international legal framework focuses on facilitating, rather than enforcing, the duty to rescue. This duty is, fundamentally, a duty of conduct and of due diligence, rather than a duty of result: states and shipmasters cannot be obligated to save lives, only to try to do so. It is a duty that is highly context-dependent, relying on the judgment of the shipmaster. For these reasons, it is a duty that is very difficult to enforce through sanction. Indeed, there is a near-total absence of legal action to enforce the rescue obligations.⁶ As a result, most law and policy seeks ways to facilitate and prepare for rescue, and coordination is a key part of that.

Maritime rescue coordination centres

Maritime rescue coordination centres are the key coordination actors identified in the SAR Convention. The SOLAS Convention and UNCLOS create the obligation for coastal states to ‘promote the establishment, operation and maintenance of an adequate and effective search and rescue service’ (UNCLOS, art 98(2)), and ‘to ensure that necessary arrangements are made for distress communication and co-ordination in their area of responsibility and for the rescue of persons in distress at sea around its coasts.’ (SOLAS, ch V, reg 7). These general obligations are elaborated in the SAR Convention, which specifically requires the establishment of MRCCs (SAR, annex, para 2.3.1) and SRRs (para 2.1.3).

The SAR Convention creates a handful of requirements for MRCCs, but most are somewhat vague. The only easily verifiable requirements are that MRCCs must operate 24 hours a day, seven days a week, and have English speaking staff (SAR Convention, annex, para 2.3.3). The SAR Convention also includes ‘softer’ requirements, including having ‘detailed SAR plans’ (para 4.1.3); ‘access’ to vessel positions (para (4.1.2); and the ability to receive distress communications and convey messages to responders (para 4.2.1, 4.2.2). It also requires that ‘each search and rescue unit shall be provided with equipment appropriate to its task’ (SAR Convention, annex, para 2.6.1), a relevant requirement but one that is open to interpretation.

The International Civil Aviation and Maritime Search and Rescue (IAMSAR) Manual provides greater detail on standard procedures for MRCCs, fleshing out many of the above requirements. The IAMSAR is only guidance, however, and does not create binding requirements.

This combination of general requirements and detailed recommendations results in a system that is difficult to monitor. There are no audits or certifications of MRCCs, for example. The establishment of some MRCCs, such as the one in Libya, have resulted in controversy.⁷ But the

⁵ See SAR Convention, annex, ch 2.1.1, 2.1.2, 2.1.3, 2.1.8, 2.1.10, 2.2.1, 2.2.2, 2.3.1, 2.4.1, 2.4.2, 3.1.1, 3.1.2, 3.1.7, 3.1.8, 3.1.9, 4.5.4, 4.6, 5.1.1; SOLAS, ch V.

⁶ Patrick J Long, ‘The Good Samaritan and Admiralty: A Parable of a Statute Lost at Sea’, *Buffalo Law Review* Vol 48, No 2 (2000) p 593-94; Arthur Alan Severance, ‘The Duty to Render Assistance in the Satellite Age’ *California Western International Law Review* Vol 36, No 2 (2006) p 377-78; Irini Papanicopolulu, ‘The duty to rescue at sea, in peacetime and in war: A general overview’ *International Review of the Red Cross* Vol 98 (2016) p 501-503; Martin Davies, ‘Obligations and Implications for Ships Encountering Persons in Need of Assistance at Sea’ *Washington Journal of International Law* Vol 12 No 1 (2003).

⁷ See, for example, Daniel Howden, Apostolis Fotiadis, and Zach Campbell, ‘Revealed: The great European refugee scandal’ *The Guardian* (12 March 2020) www.theguardian.com/world/2020/mar/12/revealed-the-great-

reality is that very few clear, binding standards exist. During regular IMO audits of member states, very little attention is paid to SAR functions, capacities, and needs.

Bilateral and multilateral agreements

The SAR Convention and IAMSAR Manual make provisions as to how MRCCs are to cooperate and support one another to ensure that distress alerts are addressed in a timely and efficient manner. Below the level of general international guidance sit bilateral and multilateral agreements. Perhaps the best example of this is the 2011 Agreement on Cooperation on Aeronautical and Maritime Search and Rescue in the Arctic.⁸ Signed by the five Nordic countries, Canada, Russia, and the United States, the legally binding instrument delimits SRRs, specifies rescue coordination centres, establishes a procedure for requesting territorial entry, commits parties to information exchange and joint exercises, and makes explicit that assistance must be provided regardless of the nationality or status of the person in distress. Many European countries have established such agreements, with the European Cooperation on Coast Guard Functions database listing dozens of such agreements.⁹

These bilateral agreements are an important structural element supporting the high-level framework created by the SOLAS and SAR Conventions, but they are not present everywhere. As discussed in the route case studies and the cross-cutting challenges section, many coastal countries operate in near-silos, with limited contact with nearby MRCCs.

The 2018 Global Compact for Safe, Orderly and Regular Migration (GCM) offers relevant, if non-binding, political grounding for stronger SAR cooperation. Objective 8 has states commit to cooperate internationally on search and rescue, standardise information exchange, and treat preservation of migrant life as a collective responsibility, including through developing specific SAR procedures and agreements consistent with international law. While the GCM creates no binding legal obligation, it reflects a broad political commitment by the states that adopted it, giving proposals for bilateral and multilateral SAR agreements a degree of pre-existing normative support to draw on. This commitment was reaffirmed more recently by the UN Secretary-General in 2024.¹⁰ These recommendations explicitly call for strengthening SAR capacity at sea and on land, adopting agreements to improve coordination of SAR operations between states consistent with international maritime law, and improving coordination of humanitarian assistance for migrants and refugees in distress.

[european-refugee-scandal](#); see also questions of the European Parliament to the European Commission: P00-3665 (3 July 2018) https://www.europarl.europa.eu/doceo/document/P-8-2018-003665_EN.html; E00-547-18 (31 January 2018) https://www.europarl.europa.eu/doceo/document/E-8-2018-000547_EN.html; E-000121/2024 (16 January 2024) https://www.europarl.europa.eu/doceo/document/E-9-2024-000121_EN.html.

⁸ Agreement on Cooperation on Aeronautical and Maritime Search and Rescue in the Arctic (2011) <https://treaty-accord.gc.ca/text-texte.aspx>.

⁹ See European Cooperation on Coast Guard Functions (European Union), 'Cooperation agreements and mechanisms' (undated) <https://coastguard.europa.eu/cooperation-mechanisms/mechanisms>.

¹⁰ UN Secretary-General, *Global Compact for Safe, Orderly and Regular Migration: Report of the Secretary-General*, UN Doc A/79/590 (14 November 2024) annex, 'Recommendations for Member States on Strengthening Cooperation on Missing Migrants and Providing Humanitarian Assistance to Migrants in Distress with the Aim of Preventing Loss of Life in Transit'.

Routes of maritime movement of refugees and migrants

This section reviews four maritime migration routes that receive less attention than the Mediterranean. There are specific dynamics to each route, but they also share a set of common coordination challenges. First, all of these routes sit along long stretches of developing country coastline. Many of these countries have professional SAR services but lack the resources and capabilities that are common in places like the Mediterranean. Second, they all face gaps in coordination. Many areas are not integrated, or only informally integrated, into the global SAR system. Where bilateral cooperation exists, it often focuses on military or security partnerships, to the exclusion of rescue. Finally, all of these routes face serious challenges in data and information on maritime movements. Estimates of the number of people crossing, particularly the number of fatalities, vary widely, sometimes by a factor of ten.

Western Indian Ocean

The Western Indian Ocean route centres on the Mozambique Channel crossing between the Comorian island of Anjouan and Mayotte, a French overseas department located approximately 70 kilometres from Anjouan. The status of Mayotte remains disputed between Comoros and France.¹¹ Crossing conditions are frequently dangerous: the Channel is subject to strong currents and cyclonic weather, and the lightweight vessels used for travel are routinely overloaded.

There are strong linguistic, cultural, family, and economic links between Mayotte and other islands in the archipelago, and this has been main migration dynamic for many years. Recent years have also witnessed broader and more complex migration routes, however, with large numbers of asylum-seekers from the Democratic Republic of the Congo.¹² People move from the African continent to Comoros and Mayotte, but also from Madagascar to Mayotte and Comoros. From mainland Africa, large ships often leave from Tanzania, with passengers then transshipped to small vessels closer to the Comoros. Recent crackdowns in Tanzania have also pushed departures further to the north (Kenya and now Somalia) and to the South (Mozambique), making the trips longer and more dangerous.

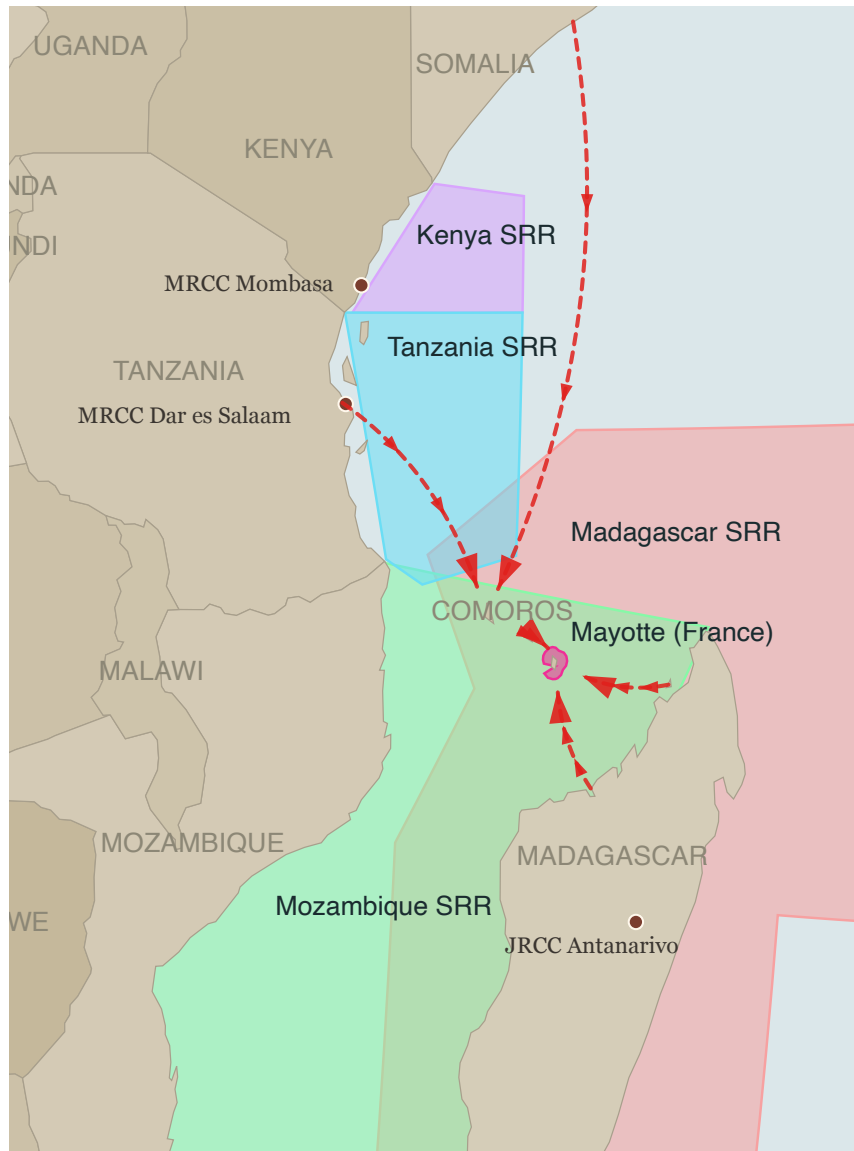
Rescue architecture

On paper, this route is well covered, with three MRCCs with IMO-notified SRRs overlapping across the Comoros archipelago. The archipelago, including Mayotte, lies within the Madagascar

¹¹ This report takes no position on this dispute and references to territory, naming, governance, and areas of claimed coordination or control should not be read as such.

¹² IOM, *Comoros country page*, <https://www.iom.int/countries/comoros>. The Mixed Migration Centre documented the interception in Q3 2024 of multiple groups of migrants from the Great Lakes region, Comoros, and Madagascar, en route to or after arrival in Mayotte. Mixed Migration Centre / ReliefWeb, *Quarterly Mixed Migration Update: North Africa Q3 2024*, <https://reliefweb.int/report/algeria/quarterly-mixed-migration-update-north-africa-quarter-3-2024>, according to statistics from France's Office for the Protection of Refugees and Stateless Persons (OFPRA), Congolese nationals made up 50% of asylum requests in Mayotte in 2025, compared to 16% in 2022. InfoMigrants, 'Mayotte, I have never heard of it': Congolese migrants flee to unfamiliar destination', April 2026, <https://www.infomigrants.net/en/post/70817/mayotte-i-have-never-heard-of-it-congolese-migrants-flee-to-unfamiliar-destination>.

SRR, administered from Antananarivo. France has further notified the IMO that its MRCC in La Réunion coordinates SAR within the claimed French territorial waters around Mayotte, which houses a SAR station.¹³ These territorial waters extend 12 nautical miles from Mayotte's baseline, approximately 32.5 km / 18 nautical miles from the southwestern tip of Anjouan, or half the distance between the two islands.¹⁴ Mozambique has also notified the IMO that its SRR covers 'the Mozambique Channel', which generally includes the waters around the Comoros (the map below approximates these boundaries).¹⁵



Map of Search and Rescue Regions (SRRs) declared to the IMO along the Western Indian Ocean route.

The Comoros has not declared an SRR but recently established its National Centre for State

Action at Sea (CNAEM) in 2023 to coordinate search and rescue, vessel traffic monitoring, marine pollution monitoring, and similar operations.¹⁶ The CNAEM remains in a nascent phase, however, and had not coordinated rescue operations as of April 2026. (FHAS is working to support the CNAEM and has provided training for them). Comoros, Madagascar, and

¹³ See IMO, GSIS: Global SAR Plan, Rescue Co-ordination Centre / France / La Réunion (21 Sept 2021) (log in required) <https://gis.imo.org/Public/COMSAR/RCC.aspx?CID=FRA&Action=View&ID=104>. But see Tomas Statius, Maud Jullien, Julia Pascual, Jack Sapoch, May Bulman, Jeannette Marié, Steffen Lüdke, Brice Donadille, Fabien Leboucq, 'Caught on camera: French police cause capsizes' Lighthouse reports (28 April 2026) <https://www.lighthousereports.com/investigation/caught-on-camera-french-police-cause-capsizes>.

¹⁴ Government of France, 'Maritime limits' (16 May 2024) <https://maritimelimits.gouv.fr/themes/french-maritime-areas>.

¹⁵ The International Hydrographic Organisation puts the northern boundary of the Mozambique Channel at the northernmost point of Ile Grand Comore. International Hydrographic Organisation, Limits of Oceans and Seas, Special Publication 28 (1953) p 22 https://web.archive.org/web/20140407060601/http://www.iho.int/iho_pubs/standard/S-23/S-23_Ed3_1953_EN.pdf.

¹⁶ Union des Comores, Décret No 23 (23 August 2023) art 4 <https://faolex.fao.org/docs/pdf/com225905.pdf>.

Mozambique are also part of an agreement with the Cape Town MRCC in South Africa to form a southern African regional rescue coordination architecture, an outcome of an international conference in Florence, Italy in 2000.¹⁷ South Africa's notified SAR region, however, excludes all of the Mozambique channel.

Data on movements

The numbers of fatalities along this route are notoriously difficult to estimate, owing in large part to the clandestine nature of movements, but may well be in the hundreds per year. IOM, with the most conservative estimates, could verify only 69 deaths in 2024, and a total of only 363 deaths since 2015. This number stands in contrast to estimates from Comorian officials, who estimate more than 50,000 deaths within the past five years, an average of 10,000 deaths per year.¹⁸ The French Senate reported that, based on some estimates, 7,000-10,000 people died attempting the crossing from 1995 to 2011,¹⁹ an average of 531 deaths per year, during a period when there were fewer migrant movements based on French reports.²⁰ Many Comorians report having a family member who has died attempting the journey, and local officials have suggested numbers five times the French Senate estimate, an average of 1,500 deaths per year.²¹ French maritime authorities do not provide similar estimates but they report intercepting 61% of the 809 detected irregular vessels in 2024; with an average of 20 people per boat, even if only a fraction of the 315 unintercepted boats capsized, it could lead to hundreds of deaths per year.²²

Ultimately, it is very difficult to estimate the number of maritime deaths on this route, beyond saying that they are significant. In the past, there have been efforts to leverage community-level monitoring mechanisms in Anjouan, to try to estimate the number of deaths without identifying individuals. This focus on the stories of family and community members may be the best way to gather this information.

Northwest African Atlantic route

The Northwest African Atlantic route to the Canary Islands connects a broad arc of West African departure coastline with Spain's Canary Islands archipelago, which lies approximately 95 km (82 nautical miles) off the nearest point of the Moroccan coast and functions as the primary EU entry point on this route. Departures, however, can begin from Western Sahara, Mauritania, Senegal, the Gambia, Guinea-Bissau, and even as far south as Guinea-Conakry, journeys that can cover more than 2,000 km of open ocean and last for weeks.

¹⁷ Anxusani, 'Angola finally in the fold for Africa agreement on search and rescue: SAMSA' The 10th Province (3 August 2019) <https://blog.samsa.org.za/tag/2000-imo-florence-agreement>.

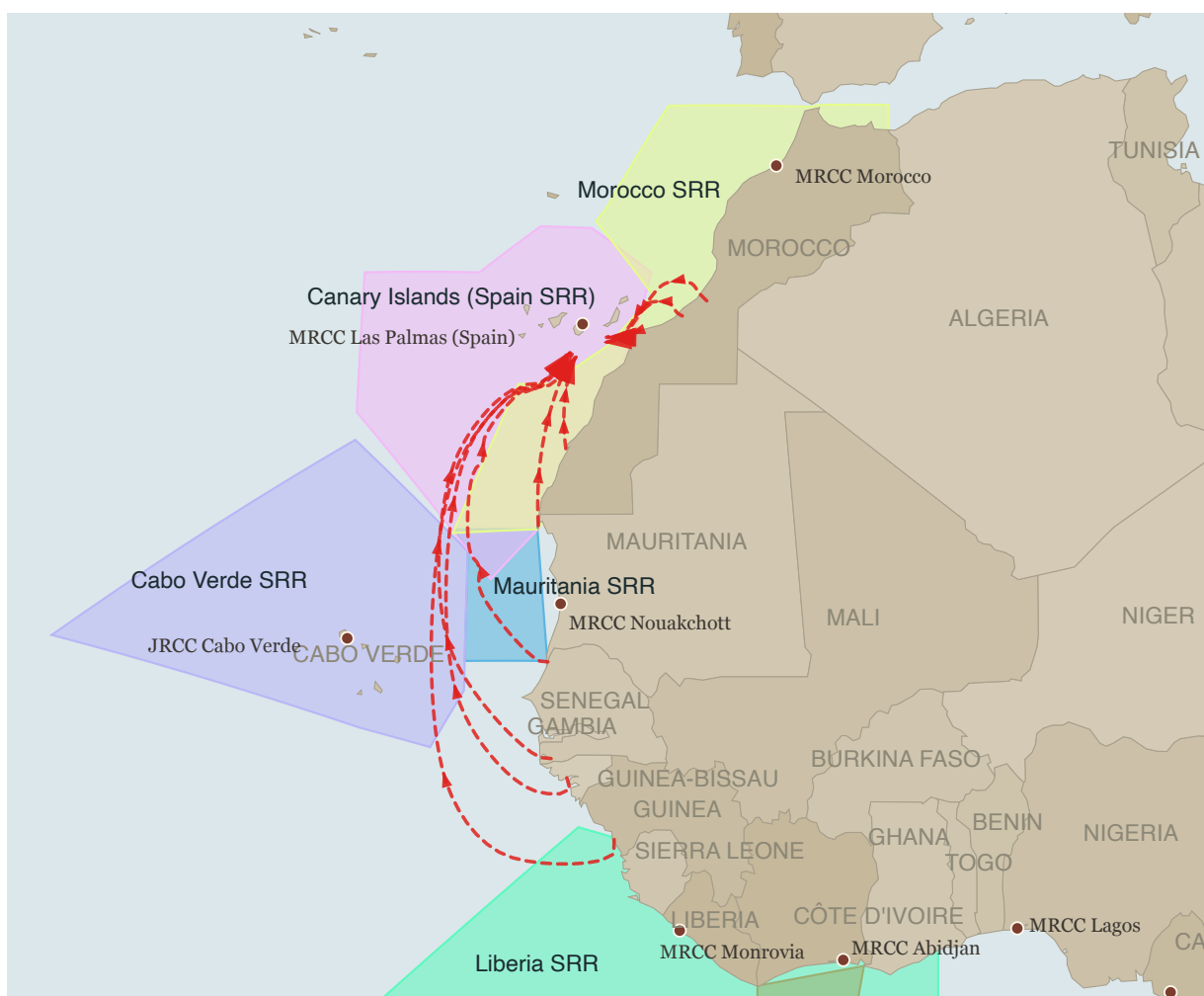
¹⁸ Information provided to FHAS during meetings in Comoros.

¹⁹ Jean-Pierre Sueur, Christian Cointat and Félix Desplan, *Mayotte: un nouveau département confronté à de lourds défis* (Rapport d'information No 675 (2011–2012), Sénat, 18 July 2012) https://www.senat.fr/rap/r11-675/r11-675_mono.html.

²⁰ French Republic, Direction de la Mer Sud océan Indien, 'Bilan des secours maritimes, Organisation SECMAR Mayotte 2014' (13 Jan 2015) p 5 https://www.dm.sud-ocean-indien.developpement-durable.gouv.fr/IMG/pdf/Bilan_SECMAR_2014_Mayotte_cle2da881.pdf.

²¹ James Caunt, 'COVID-19 deepens divisions in the Comoros Islands' Africa is a Country (28 April 2020) <https://africasacountry.com/2020/04/covid-19-deepens-division-in-the-comoros-islands>; Elise Wicker, 'France's "migrant cemetery" in Africa' BBC (19 Oct 2015) <https://www.bbc.com/news/magazine-34548270>.

²² Préfet de Mayotte, '2024 Bilan de l'opération Shikandra' (Undated) <https://www.mayotte.gouv.fr/index.php/contenu/telechargement/29232/264578/file/Bilan%20LIC%202024%20.pdf>.



Map of SRRs along the Northwest African Atlantic route. Note the absence of any SRRs declared to the IMO along the Senegalese-Guinea Bissau coast.

The number of people moving to the Canary Islands by sea peaked in 2023 and 2024 but declined by 60% to 17,700 in 2025.²³ The EU border agency Frontex attributed this drop to agreements with coastal West African countries and stepped-up interdiction measures.²⁴ IOM notes, however, that this has often led to longer and riskier journeys.²⁵ As interdiction increases on the northern parts of the route, where the crossing is relatively short, more and more embarking from Guinea, resulting in nearly 2,000 km of travel even if all goes well.²⁶ Attempting to cross such distances becomes particularly dangerous, as currents in this area have carried small migrant boats far off course, towards Brazil and the Caribbean.²⁷

²³ Leslie Carretero, 'Canary Islands: Migrant arrivals fell by more than 60 percent in 2025' InfoMigrants (15 Jan 2026) <https://www.infomigrants.net/en/post/69225/canary-islands-migrant-arrivals-fell-by-more-than-60-percent-in-2025>.

²⁴ Frontex, 'EU external borders: irregular crossings down 18% in the first 7 months' (7 August 2025) <https://www.frontex.europa.eu/media-centre/news/news-release/eu-external-borders-irregular-crossings-down-18-in-the-first-7-months-of-2025-ArNz2R>.

²⁵ IOM, 'Nearly 8,000 Migrant Deaths Recorded in 2025, New IOM Data' (21 April 2026) <https://www.iom.int/news/nearly-8000-migrant-deaths-recorded-2025-new-iom-data>.

²⁶ Caminando Fronteras, Monitoring the Right to Life 2025 (December 2025) <https://caminandofronteras.org/wp-content/uploads/2026/02/Monitoring-The-Right-To-Life-2025-last.pdf>.

²⁷ IOM, '21 Migrants Died Every Day in 2025, New IOM Data Reveals' (26 Feb 2026) <https://www.iom.int/news/21-migrants-died-every-day-2025-new-iom-data-reveals>.

Rescue architecture

The West African coast is composed of a number of formal and informal SAR regions. Cabo Verde, Mauritania, Morocco, and Spain (Canary Islands) have all declared SAR regions to the IMO.²⁸ Senegal, the Gambia, Guinea, and Guinea-Bissau, however, have not. This leaves a substantial gap in the formally declared SAR zones at major countries of departure. Some of these countries, like the Gambia, have essentially no SAR capacity. Others like Senegal, however, have professional maritime forces and have shown significant interest in strengthening their SAR and maritime coordination capabilities. The Liberian SRR extends as far north as Guinea-Bissau and extends west to the mid-Atlantic, even though Liberia has extremely limited SAR assets. Spain has signed bilateral agreements that include SAR cooperation with Morocco and Mauritania.²⁹

Frontex has attempted a series of initiatives in the region. After reportedly failed attempts to form agreements with Mauritania and Senegal, Frontex established an aerial surveillance programme based in Cabo Verde.³⁰ Frontex also maintains non-operational information-sharing with many West African countries, and Spain stations Guardia Civil personnel and assets in Senegal and Mauritania.³¹

The West African coast also has a developing system for maritime domain awareness, the Yaoundé Code of Conduct, focused on the Gulf of Guinea. This mechanism has limited relevance for SAR, however, because it does not include Mauritania, does not have an operational zone in the relevant area, and focuses on anti-piracy and illegal fishing.³²

Data on movements

The mortality data on this route continues to present an acute divergence between lower and higher estimates. In 2024, IOM's Missing Migrants Project and Caminando Fronteras—both humanitarian organisations concerned with migrant protection—diverged in their fatality

²⁸ See IMO, GSIS: Global SAR Plan <https://gis.imo.org/public/default.aspx> (log in required). (log in required).

²⁹ See, for example, Agreement between the Kingdom of Spain and the Islamic Republic of Mauritania on cooperation in security matters, done ad referendum in Madrid on 26 May 2015, Agencia Estatal Boletín Oficial del Estado (BOE), No 108 (4 May 2018) [https://www.boe.es/eli/es/ai/2015/05/26/\(1\)](https://www.boe.es/eli/es/ai/2015/05/26/(1)); Treaty of Friendship, Good Neighborliness and Cooperation between the Kingdom of Spain and the Islamic Republic of Mauritania, done in Madrid on July 24, 2008, BOE No 236 (30 Sept 2024) [https://www.boe.es/eli/es/ai/2008/07/24/\(2\)](https://www.boe.es/eli/es/ai/2008/07/24/(2)); Agreement between the Kingdom of Spain and the Kingdom of Morocco on Technical Cooperation and Mutual Assistance in Matters of Civil Protection, BOE No 45 (22 Feb 1993) [https://www.boe.es/eli/es/ai/1987/01/21/\(1\)](https://www.boe.es/eli/es/ai/1987/01/21/(1)); Cooperation agreement on the fight against pollution and maritime rescue between the Kingdom of Spain and the Kingdom of Morocco, made "ad referendum" in Rabat on February 6, 1996, BOE No 253 (22 Oct 1999) [https://www.boe.es/eli/es/ai/1996/02/06/\(2\)](https://www.boe.es/eli/es/ai/1996/02/06/(2)).

³⁰ Matthias Monroy, 'Frontex launches aerial surveillance in West Africa – its Fundamental Rights Officer raises concerns' Dissecting Security Architectures (15 November 2025) <https://digit.site36.net/2025/11/15/frontex-launches-aerial-surveillance-in-west-africa-its-fundamental-rights-officer-raises-concerns>.

³¹ La Moncloa, 'Grande-Marlaska agradece a Mauritania la "excelente cooperación" en seguridad y contra las mafias que trafican con personas' La Moncloa (16 Oct 2025) <https://www.lamoncloa.gob.es/serviciosdeprensa/notasprensa/interior/paginas/2025/161025-marlaska-mauritania-trafico-personas.aspx>; La Moncloa, 'España y Senegal constatan en Madrid la "solidez" de su cooperación en materia migratoria' La Moncloa (21 Mar 2025) <https://www.lamoncloa.gob.es/serviciosdeprensa/notasprensa/interior/Paginas/2025/210325-marlaska-senegal-cooperacion-migratoria.aspx>.

³² IMO, Maritime Security in West and Central Africa <https://www.imo.org/en/OurWork/Security/Pages/West-and-Central-Africa.aspx>; Interregional Coordination Centre (ICC), Yaoundé Architecture <https://icc-gog.org>.

estimates by a ratio of nearly 10:1, with Caminando Fronteras estimating 9,757 dead or missing and IOM estimating 1,070.³³ While IOM acknowledges the conservative nature of its methodology, this remains a stark difference. This gap closed in 2025, but there remains a difference of more than 60% between the two estimates.³⁴

Bay of Bengal and Andaman Sea

The Bay of Bengal and Andaman Sea route connects the primary departure points of Cox's Bazar in Bangladesh, which hosts the world's largest refugee camp, and Rakhine State in Myanmar, with the intended destinations of Malaysia and Indonesia. This route covers a vast expanse of open ocean, bounded by the coasts of Myanmar and Thailand to its north and east, with India's Andaman and Nicobar Islands forming its western boundary, before entering the Strait of Malacca. The population in movement is overwhelmingly Rohingya, with a small proportion of Bangladeshi migrants.³⁵ The Rohingya are a Muslim ethnic minority to whom Myanmar denies citizenship, rendering them stateless, and who have faced documented persecution, forced displacement, and a military campaign characterised by a UN Fact-Finding Mission as bearing the hallmarks of genocide.³⁶

Rescue architecture

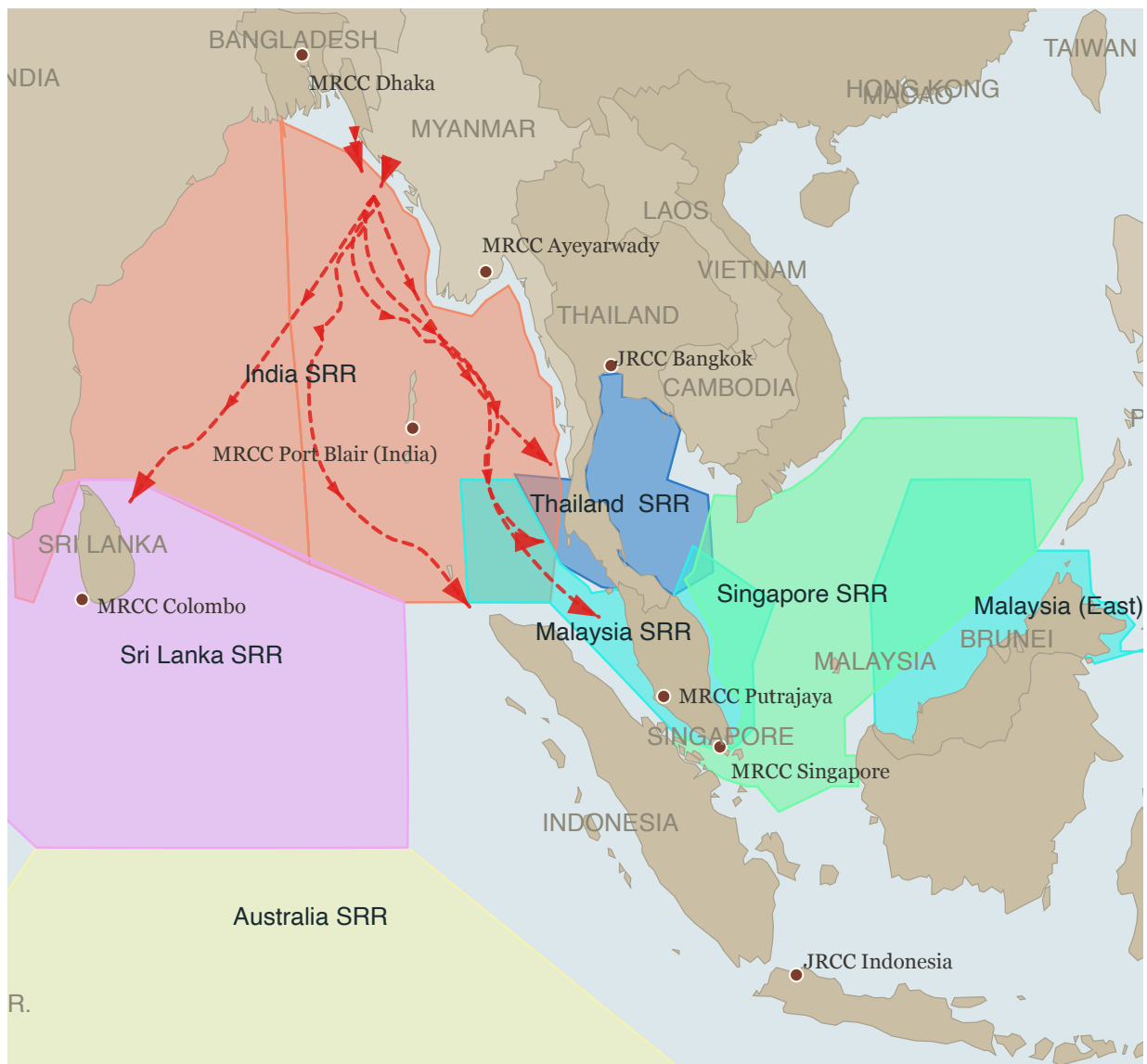
The SAR architecture across the Bay of Bengal and Andaman Sea is fragmented, involving a number of declared and undeclared SRRs, a wider range of governance contexts, and a structural challenge with few parallels: the state whose SRR encompasses the primary departure coastline, Myanmar, is simultaneously the persecuting authority and nominal SAR coordinator for the population in flight. None of the most important countries along this route—Bangladesh, the most frequent country of departure; Myanmar, with the longest coastline along the route; and Indonesia, the most frequent country of initial intended landfall—have declared a SRR to the IMO. Most of the waters in the Bay of Bengal and Andaman Sea lie in India's declared SRR. The entry to the Strait of Malacca, a common destination for many Rohingya boats, is covered by three partially overlapping SRRs from India, Thailand, and Malaysia. Indonesia, as noted, has no formal zone and the Australia SRR is more than 500 km from its Aceh province, a common landing point.

³³ See and compare: IOM, 'Irregular Migration Routes to Europe: Western Africa—Atlantic Route' (May 2025) <https://rodakar.iom.int/sites/g/files/tmzbdl696/files/documents/2025-06/2024.12-eng-iom-flow-from-western.pdf>; Caminando Fronteras, Monitoring the Right to Life 2024 (December 2025) p 12 https://caminandofronteras.org/wp-content/uploads/2024/12/DALV2024_EN-WEB.pdf.

³⁴ Caminando Fronteras estimated 1,906 deaths while IOM estimated 1,214 in 2025. See Caminando Fronteras, Monitoring the right to life 2025 (Dec 2025) p 11 <https://caminandofronteras.org/en/monitoreo/monitoring-the-right-to-life-2025>; IOM, 'Irregular Migration Routes to Europe: Western Africa—Atlantic Route' (December 2025) https://dtm.iom.int/dtm_download_track/93296?file=1&type=node&id=62321.

³⁵ UNHCR, '2025 was the deadliest year yet for maritime movements of Rohingya refugees' (17 April 2026) www.unhcr.org/news/briefing-notes/unhcr-2025-was-deadliest-year-yet-maritime-movements-rohingya-refugees; Gavin Blackburn, 'Almost 8,000 people died or disappeared on migration routes in 2025, IOM says' EuroNews (21 April 2026) www.euronews.com/2026/04/21/almost-8000-people-died-or-disappeared-on-migration-routes-in-2025-iom-says.

³⁶ Human Rights Watch, 'Southeast Asia: End Rohingya Boat Pushbacks' (14 May 2015) www.hrw.org/news/2015/05/14/southeast-asia-end-rohingya-boat-pushbacks; Report of the independent international fact-finding mission on Myanmar, A/HRC/39/64 (12 Sept 2018) www.ohchr.org/sites/default/files/Documents/HRBodies/HRCouncil/FFM-Myanmar/A_HRC_39_64.pdf.



Search and rescue regions (SRRs) in the Bay of Bengal and Andaman Sea. Note the absence of any SRR declared to the IMO along the Indonesian coast.

The ensuing response is a mix of interception, refoulement, ‘push back’, and rescue operations. Myanmar, while it does not have a declared SAR zone, has intercepted Rohingya vessels, and the Myanmar coast is avoided for this reason.³⁷ Other states in the region have allegedly returned Rohingya to Myanmar, acts that if true would amount to refoulement in violation of international law.³⁸ More commonly, however, interceptions near the Strait of Malacca result in a refusal to allow the boat to land accompanied by the provision of supplies.³⁹ There are also a number of

³⁷ Sm Najmus Sakib, ‘UN fears 427 Rohingya perished at sea in search of safe shelter’ Anadolu Ajansi (24 May 2025) www.aa.com.tr/en/asia-pacific/un-fears-427-rohingya-perished-at-sea-in-search-of-safe-shelter/3578032.

³⁸ OHCHR, ‘Alarmed by reports of Rohingya cast into the sea from Indian naval vessels, UN expert launches inquiry of “unconscionable, unacceptable acts”’ (15 May 2025) www.ohchr.org/en/press-releases/2025/05/alarmed-reports-rohingya-cast-sea-indian-navy-vessels-un-expert-launches?sub-site=HRC.

³⁹ Alex Kwok, ‘Malaysia expels two boats carrying 300 suspected Rohingya refugees’ Jurist (5 January 2025) www.jurist.org/news/2025/01/malaysia-expels-two-boats-carrying-300-suspected-rohingya-refugees; Human Rights Watch, ‘Thailand: Don’t Deport Rohingya “Boat People”’ (2 January 2013) www.hrw.org/news/2013/01/02/thailand-dont-deport-rohingya-boat-people.

clear cases of rescue, where authorities in the region have actively rescued Rohingya on vessels in clear distress or searched for survivors after a vessel capsized.⁴⁰

The regional institutional architecture is similarly fragmented. The Bali Process on People Smuggling, Trafficking in Persons and Related Transnational Crime, co-chaired by Australia and Indonesia, is the primary multilateral framework covering the route, but its mandate frames maritime movements as a law enforcement and trafficking problem rather than a SAR challenge.⁴¹ The Bali Process has initiated occasional SAR coordination and training initiatives since 2016, but most analysts find that this has not translated into significant action by states.⁴² The Bay of Bengal Initiative for Multi-sectoral Technical and Economic Cooperation (BIMSTEC) brings together many littoral states with maritime security and development cooperation frameworks, but SAR is not a focus and key countries (Malaysia and Indonesia) are not members.⁴³ The regional situation is compounded by the fact that many countries are neither party to the SAR Convention nor the 1951 Refugee Convention, creating a patchwork of legal obligations regarding the protection of migrants and refugees travelling by boat in this context. The Association of Southeast Asian Nations (ASEAN) completed an agreement on maritime and aeronautical search and rescue in 2023, but it has yet to receive any ratifications.⁴⁴

Data on movements

The mortality data on this route is characterised by high uncertainty. UNHCR documented nearly 900 deaths and disappearances in 2025, with IOM's figure of 922 for the Eastern Route (which encompasses but is broader than the Bay of Bengal/Andaman Sea corridor) closely aligned.⁴⁵ A November 2024 policy roundtable on improving the response to people going missing along dangerous routes in Asia convened by the Bali Process Regional Support Office, UNHCR, IOM and the ICRC revealed that over two-thirds of recorded fatalities on the route remain unidentified, and noted that existing data on missing migrants is limited, particularly information

⁴⁰ Gerhard Hoffstaedter, Antje Missbach, Chris Lewa, Erik Ramadhani. 'Rohingya boats: out of mind but still coming' The Interpreter (9 Feb 2026) www.lowyinstitute.org/the-interpreter/rohingya-boats-out-mind-still-coming; see also cases of Sri Lanka rescue: IFRC, 'Sri Lanka population movement 2022 – Final report' (31 July 2023) <https://reliefweb.int/report/sri-lanka/sri-lanka-population-movement-2022-final-report-mdrlk016>.

⁴¹ See generally, 'The Bali Process' (undated) <https://www.baliprocess.net>.

⁴² Tri Nuke Pudjiastuti, Christy Kumesan, Caitlin McCaffrie, Naparat Kranrattansuit, 'Australia's role in preventing the next Andaman Sea refugee catastrophe' The Interpreter (26 May 2025) www.lowyinstitute.org/the-interpreter/australia-s-role-preventing-next-andaman-sea-refugee-catastrophe.

⁴³ Toru Takahashi, 'Bay of Bengal cooperation is critical amid the global crisis: BIMSTEC chief' Nikkei Asia (12 May 2026) asia.nikkei.com/politics/international-relations/bay-of-bengal-cooperation-is-critical-amid-the-global-crisis-bimstec-chief.

⁴⁴ ASEAN Treaty Division, ASEAN Legal Instruments (undated) agreement.asean.org/search.html?q=search+rescue.

⁴⁵ UNHCR, *2025 was deadliest year yet for maritime movements of Rohingya refugees* (17 April 2026) <https://www.unhcr.org/news/briefing-notes/unhcr-2025-was-deadliest-year-yet-maritime-movements-rohingya-refugees>; IOM, *2025 Missing Migrants Project Asia-Pacific Annual Regional Overview* (2026) 8–9 https://missingmigrants.iom.int/sites/g/files/tmzbdl601/files/publication/file/2025%20MMP%20Asia%20Pacific%20-%20Annual%20Regional%20Overview_0.pdf

on sex and age.⁴⁶ Many sources indicated that official records likely understate significantly the true scale of fatalities.⁴⁷

Gulf of Aden

The Gulf of Aden route connects the Horn of Africa with Yemen, with Saudi Arabia and other Gulf states as the ultimate destination. Unlike other routes covered in this report, travel often takes place in both directions, with most refugees and migrants travelling north to Saudi Arabia but a substantial minority making the reverse movement back. The route is one of the world's busiest migration corridors, with IOM reporting more than 110,000 people making the journey towards Yemen and Saudi Arabia and 20,500 making the return trip in 2025.⁴⁸ There is a strong likelihood that these numbers are significant undercounts because IOM monitoring was interrupted for nearly six months due to operational constraints in 2025, yet even so the 2025 numbers are higher than 2024.⁴⁹ The motivation for these movements is well-documented: nearly 80% of migrants surveyed at flow monitoring points cite conflict as the primary driver, with climate shocks, chronic poverty, and absence of economic prospects as compounding factors.⁵⁰

Rescue architecture

The Gulf of Aden is simultaneously one of the world's most active migration corridors and one of its most contested and militarised maritime zones, creating complications for SAR coordination and operations. The Houthis in Yemen have attacked more than 100 commercial vessels since 2023, resulting in the deaths of eight seafarers, with continued threats at the time of writing and a large-scale diversion of ships away from the Red Sea and Suez Canal.⁵¹ This has resulted in fewer and more security conscious commercial ships traversing the Gulf of Aden. Commercial shipping companies have also reported that fears of piracy are a major deterrent to approaching or assisting small boats in the Gulf.⁵²

⁴⁶ Regional Support Office, the Bali Process, 'RSO, IOM, UNHCR, and ICRC convene a Policy Roundtable to improve the response to people going missing along dangerous routes in Asia' (28 November 2024) [rso.baliprocess.net/rso-iom-unhcr-and-icrc-convene-a-policy-roundtable-to-improve-the-response-to-people-going-missing-along-dangerous-routes-in-asia](https://baliprocess.net/rso-iom-unhcr-and-icrc-convene-a-policy-roundtable-to-improve-the-response-to-people-going-missing-along-dangerous-routes-in-asia); see also, Vibhu Mishra, 'Migrant deaths hit record high in 2024, UN data reveals' UN News (25 March 2025) <https://news.un.org/en/story/2025/03/1161521>; IOM Missing Migrants Project, Annual Regional Overview, Asia Pacific, 2023 (2023) p 1 missingmigrants.iom.int/sites/g/files/tmzbd1601/files/publication/file/2023%20MMP%20Asia%20Pacific%20-%20Annual%20Regional%20Overview_0.pdf.

⁴⁷ Regional Support Office, the Bali Process; Mishra.

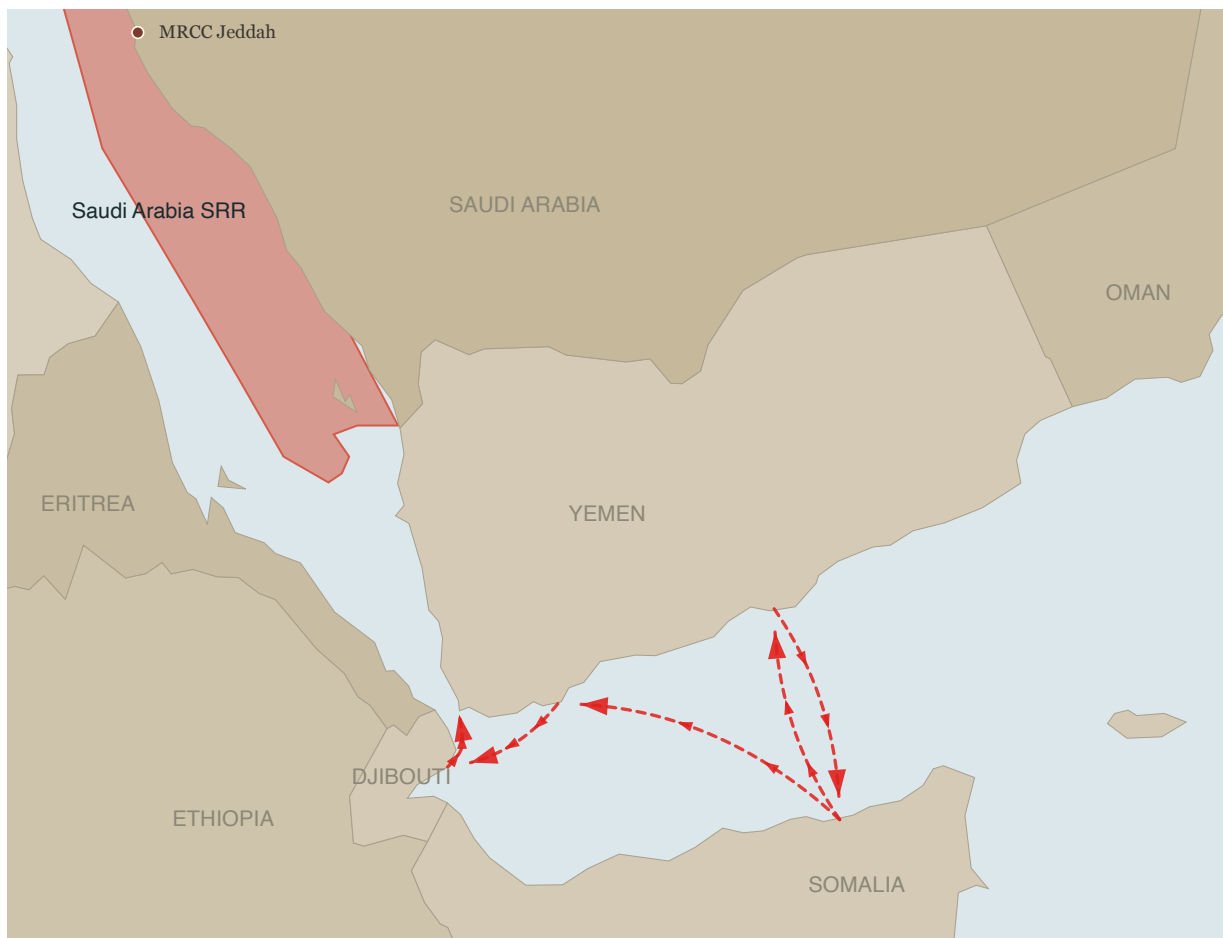
⁴⁸ IOM, IOM's DTM Yemen: Flow Monitoring Annual Report 2025 (2025) <https://dtm.iom.int/reports/yemen-annual-flow-monitoring-report-2025>; IOM, Migration along the Eastern Route, report 62 (23 March 2026) <https://dtm.iom.int/reports/east-horn-and-southern-africa-migration-along-eastern-route-report-62-january-december-2025>.

⁴⁹ IOM, Migration along the Eastern Route, report 62 (23 March 2026) <https://dtm.iom.int/reports/east-horn-and-southern-africa-migration-along-eastern-route-report-62-january-december-2025>. Both the outbound and return numbers represent increases over 2024.

⁵⁰ IOM, 'Flow monitoring registry dashboard, Non-Yemeni migrant arrivals in May 2024 (20 June 2024) https://dtm.iom.int/sites/g/files/tmzbd1461/files/reports/20240619_FMR_Migrant%20Arrivals%20And%20Yemeni%20Returnees%20from%20KSA_May%202024%20Dashboard_0.pdf.

⁵¹ Mike Schuler, 'Red Sea Corridor Slips Back into Crisis as Houthi Threats Resurface' GCaptain (2 March 2026) <https://gcaptain.com/red-sea-corridor-slips-back-into-crisis-as-houthi-threats-resurface>.

⁵² IRIN News, 'The risks of rescue at sea' The New Humanitarian (5 December 2011) <https://www.thenewhumanitarian.org/report/94383/migration-risks-rescue-sea>.



Map of SRRs in the Gulf of Aden. Note that the entire region of migrant and refugee movement is not part of any declared SRR.

The SAR architecture on the Gulf of Aden route is defined by a critical institutional gap: according to IMO's Global SAR Plan, none of the four countries along the Gulf of Aden—Yemen, Djibouti, Somalia, and Eritrea—have a Rescue Coordination Centre registered with the IMO.⁵³ The closest formally registered MRCC operates from Saudi Arabia (Jeddah, Dammam), more than 360 km north of Djibouti. The European Union, United Nations, and regional governments have programmes underway to strengthen coast guard capacities in Somalia, Yemen, and Djibouti, but these programmes are generally focused on security and have not translated into IMO-recognised rescue facilities yet.⁵⁴ UNODC is training coast guards in Yemen for example but huge lack of means.

This capacity gap is likely to widen rather than close. Recent aid cuts are significantly reducing Somalia's fiscal space, increasing pressure on government finances and weakening the state's

⁵³ IMO, Global SAR Plan (undated) <https://gisis.imo.org/Public/COMSAR/NationalAuthority.aspx>. Note that Yemen is listed as a contracting government but does not have a recognized MRCC nor has Yemen notified the coordinates of a SAR region. Eritrea, Djibouti, and Somalia are not even listed as contracting parties.

⁵⁴ See generally, IMO, 'The Djibouti Code of Conduct' (undated) <https://www.imo.org/en/ourwork/security/pages/content-and-evolution-of-the-djibouti-code-of-conduct>; UN Office on Drugs and Crime, 'Gulf of Aden & the Red Sea' (undated) <https://www.unodc.org/unodc/piracy/gulf-of-aden-and-red-sea.html>; Project News, 'Strengthening Maritime Security: Somalia Inaugurates New Maritime Rescue Coordination Centre' EU CRIMARIO (9 December 2024) <https://crimario.eu/strengthening-maritime-security-somalia-inaugurates-new-maritime-rescue-coordination-centre>;

capacity to fund security, public services, and long-term development.⁵⁵ Given how heavily Somali state functions, including maritime security and coast guard capacity, depend on donor support, reduced assistance flows are likely to constrain SAR-relevant capacity.

The waterway's history of piracy and conflict has also led to four multinational naval coalitions patrolling the strait.⁵⁶ None of these operations have SAR as a core mission set, even though all are under the same general obligation to assist vessels in distress under UNCLOS and customary international law. Conducting rescue, however, will often require diverting limited military assets. This does not absolve these operations of their duty but rather requires them to include such diversions within their contingency plans. Some of these naval operations have performed rescues in the past, although these appear to have exclusively involved conventional distress calls from commercial vessels and fishermen.⁵⁷

Data on movements

With a turbulent security situation and gaps in regional state capacity, data on the situation of migrants and refugees is a challenge. IOM, which operates dedicated monitoring sites at points in Djibouti, Somalia, and southern Yemen, estimates that 731 died or went missing in 19 maritime incidents in 2025.⁵⁸ This number is, of course, a conservative estimate, compounded by the challenge of IOM monitoring suspension due to funding constraints for six months in 2025 noted above and access challenges to Houthi-controlled areas of Yemen. As with many routes, moreover, many maritime migrants (and the smugglers who pilot their journeys) seek to avoid discovery, often moving at night and regularly seeking new departure areas where the distance across the Gulf is longer but patrols are less likely.⁵⁹

⁵⁵ World Bank Group, 'Somalia's Growth Continues, But Shocks and Aid Cuts Intensify Risks to Jobs and Livelihoods' Press Release (13 May 2026) https://www.worldbank.org/en/news/press-release/2026/05/13/somalia-growth-continues-but-shocks-and-aid-cuts-intensify-risks-to-jobs-and-livelihoods?utm_source=chatgpt.com.

⁵⁶ These include: the European Union's Operation Aspides (vessel escort in the Red Sea) and Operation Atalanta (anti-piracy operations in the Gulf of Aden and Somali coast); and the US-led Operation Prosperity Guardian (started in 2023 in response to Houthi attacks) and Combined Maritime Force (longstanding anti-terrorism / anti-piracy operation operating in the Gulf of Aden since 2009).

⁵⁷ See, for example, EUNAVFOR ATALANTA, 'EUNAVFOR ATALANTA Newsletter November 2025' (November 2025) <https://eunavfor.eu/index.php/newsletter/eunavfor-atalanta-newsletter-november-2025>; US 5th Fleet Public Affairs, 'U.S. Naval Forces Rescue Mariners from Stranded Ship in Gulf of Aden' (18 June 2021) <https://www.centcom.mil/MEDIA/NEWS-ARTICLES/News-Article-View/Article/2664622/us-naval-forces-rescue-mariners-from-stranded-ship-in-gulf-of-aden>; Alix Willemez and Louis Martin-Vézian, 'EUNAVFOR: Switching from pirates to migrants?'

⁵⁸ Analysis of data available at IOM, 'Download Missing Migrants Project Data' (undated) <https://missingmigrants.iom.int/downloads?xls=1779364284>.

⁵⁹ Eva Sibanda, 'Tracking the Journey Behind the Numbers and Voices of Migrants in Djibouti' IOM (15 July 2025) <https://ehsa.iom.int/stories/tracking-journey-behind-numbers-and-voices-migrants-djibouti>.



Cross-route challenges

The four routes reviewed differ significantly in geography, migration dynamics, and political context, yet they exhibit a remarkably consistent set of coordination challenges around fragmented governance, operational limitations, and gaps in data and reporting. These challenges are overlapping in some areas but warrant distinct discussion.

Fragmented rescue governance

Gaps in the SAR framework

The overarching legal framework created by the SOLAS and SAR Conventions, and institutional support from the IMO, creates the impression of an interconnected, global network of MRCCs. But many operate in relative isolation.

The SAR Convention calls for ‘sufficient’ search and rescue regions (SRRs) in an area, without specifying a standard for sufficiency. It also requires states to establish MRCCs if ‘appropriate’ but again does not require all states to have an MRCC or have rescues on their coastline coordinated by an MRCC.⁶⁰ For example, while many unofficial SAR maps (even those released by governments) show the whole globe covered by interlocking SAR zones, in reality this is not the case. All MRCCs and SRRs must be formally notified to the IMO through their Global SAR Plan,⁶¹ and this plan has notable gaps along many coastlines. Particularly relevant for this report, discussed in the case studies above, are gaps along coasts critical for maritime migration.

The IAMSAR Manual encourages cooperation between MRCCs in a given region, provides basic instructions for handing over responsibility for a SAR operation, and even includes a template

⁶⁰ SAR Convention, 2.1, 2.2, 2.3.

⁶¹ IMO, *Guidance for entering and updating information on search and rescue services into GISIS and on how to get access to the information for operational use*, COMSAR.1/Circ.61 (8 July 2025) <https://www.wcdn.imo.org/localresources/en/OurWork/Safety/Documents/COMSAR.1-Circ.61%20-%20Guidance%20For%20Entering%20And%20Updating%20Information%20On%20Search%20And%20Rescue%20Services%20Into%20GISIS.pdf>.

agreement for SAR cooperation between different MRCCs.⁶² In the FHAS survey, only half of respondents had formal agreements with neighbouring country MRCCs and only one quarter had reporting protocols. The duty to rescue is fundamentally difficult to enforce through sanction, and thus the major treaties include very few enforceable provisions. The emphasis on coordination is an important means of facilitating, promoting, and preparing for rescue, but many aspects of coordination are hortatory rather than clear obligations.

This creates a false sense of security and predictability in the global SAR system. Many high-income countries invest heavily in SAR capacity and effectively coordinate rescues across vast areas of ocean. But there are important gaps, particularly along the underserved migration routes focused on in this report. These MRCCs, as detailed above, do not benefit from an imagined global SAR network. They are largely left to coordinate rescue on their own.

The SOLAS and SAR conventions create obligations on each state to coordinate rescue in their 'around its coasts' (SOLAS) and to notify the IMO of agreed search and rescue regions (SAR Convention).⁶³ Many countries have done so, with states like Australia, India, Liberia, Portugal, and the United States taking responsibility for rescue coordination across wide swathes of ocean, despite SAR coordination conferring no sovereign or territorial claims. Many countries, however, have established MRCCs but failed to formally notify the IMO of a SAR region.⁶⁴ These include key coastal countries along migration routes, including Bangladesh, Indonesia, and Myanmar. Other such states, such as Comoros and Senegal, have neither registered MRCCs nor declared SAR regions, despite, in Senegal's case, having capable maritime authorities.

The reality of large gaps in formally notified SAR regions is not well known, with widely available maps of SAR regions including SAR region coverage in areas not reflected by IMO records. The United States Coastguard and Canadian coastguard, for example, have publicly available SAR maps that show nearly every inch of the world's oceans assigned to a particular country, despite the gaps noted above.⁶⁵ Senegal and Indonesia, for example, are both shown with significant SAR regions. These maps give the sense that there is a single, complete network of MRCCs around the world, interconnected and synchronised.

It should be noted that the absence of a region from the IMO's records does not always reflect a true absence of SAR activity. Even states with high capacity, such as the United States, had errors in the submission of their SAR region coordinates to the IMO.⁶⁶ It is possible that states have adequate SAR capacity but failed to register with the IMO for administrative reasons. At the same time, the failure to meet the basic legal obligations for declaring SAR zones speaks to the

⁶² International Civil Aviation Organisation (ICAO) and IMO, IAMSAR Manual Volume I (2010 version) 2.2.10, 5.1.5, appendix I <https://archive.org/details/5769977-Doc-9731-IAMSAR-Manual-Vol-I-Ed-2010-En>; ICAO and IMO, IAMSAR Manual Volume II (2010 version) 3.6.7 <https://archive.org/details/iamsarmanualinte0000inte/page/n35/mode/2up>.

⁶³ SOLAS, ch V, reg 7; SAR Convention, annex, ch 2.1.12.

⁶⁴ See generally, IMO, Global SAR Plan (undated) <https://gis.imo.org/Public/COMSAR>.

⁶⁵ See United States Coast Guard, 'IMO Maritime SAR Regions' (Undated) <https://www.dco.uscg.mil/Portals/9/CG-5R/nsarc/IMO%20Maritime%20SAR%20Regions.pdf>; Canada Coast Guard, 'Search and Rescue Contacts' (Undated) <https://sarcontacts.info>.

⁶⁶ The United States lists ten separate SAR zones around its extensive coastline, but the coordinates for its 'Boston' and 'Norfolk' SRRs are essentially identical. This results in with no declared SRR across the Mid-Atlantic, from northern New Jersey to South Carolina. See gis.imo.org.

disjointedness of the system and the general disinterest from states and the IMO to improve coordination.

Focus on maritime security over maritime SAR

One of the most striking findings across all four routes is that regional coordination agreements are widespread but rarely focus on rescue.

On the Northwest African route, Frontex maintains surveillance and information-sharing arrangements focused on irregular migration and border management. In the Gulf of Aden, multiple multinational naval coalitions maintain extensive maritime awareness capabilities focused on piracy, terrorism, and commercial shipping security. In Southeast Asia, the Bali Process provides a framework for cooperation on people smuggling and trafficking. In the Gulf of Guinea, the Yaoundé Architecture facilitates maritime security cooperation among coastal states.

These systems demonstrate that information-sharing across borders is possible. They also illustrate that maritime migration is often approached through a security lens rather than a rescue lens. Information collected through surveillance systems may not be routinely incorporated into SAR coordination processes. Likewise, institutions responsible for migration management may have incentives that differ from those of humanitarian actors focused on saving lives at sea and preventing deaths and disappearances.

The result is not necessarily an absence of coordination, but the existence of multiple parallel coordination systems pursuing different objectives. Maritime migration therefore presents a coordination challenge not only between states but also between institutional communities operating under different mandates.

All four routes examined in this report involve some degree of overlap between SAR obligations and maritime security or border management. This overlap creates structural incentives for information-sharing restrictions: an MRCC that also functions within a national security and border enforcement system may have institutional reasons to limit the information it shares in general, with particularly tight control over information on the location and circumstances of irregular migration movements. The survey finding that one of the six MRCCs had no established communication channels with neighbouring centres, and that several others relied on informal rather than structured protocols, is consistent with a broader pattern in which security and enforcement framings of



maritime migration create friction in the coordination frameworks established under the SAR Convention.

Limited operational capacity

Effective SAR coordination depends on reliable information exchange and sufficient operational capacity to act on it. Across all four routes, both are absent, supported by the FHAS survey. The International Civil Aviation Organisation (ICAO) conducted a series of audits of 165 member states (2005-2010), finding significant gaps:

- 38% of States had not laid down provisions for entry into their territory of SAR units of other States for the purpose of search for the site of aircraft accidents and rescuing survivors;
- 44% of States had not developed a detailed plan on operation for the conduct of SAR operations within their respective Search and Rescue Regions (SRRs); and
- 67% of States had not established the necessary coordination of their SAR organisations with those of neighbouring States, including the conclusion of bi-lateral SAR agreements to coordinate SAR operations.⁶⁷

While these findings are specific to civil aviation and were conducted more than 15 years ago, the FHAS survey reflected continued gaps of similar proportions among the six participating countries. On communications, GMDSS coverage gaps and difficulty reaching commercial vessels were each flagged by five of the six responding MRCCs; four reported no standardised protocols with neighbouring centres; most relied on informal methods rather than structured reporting formats. Regarding assets, five respondents identified lack of air and marine resources as a coordination challenge; one had no dedicated rescue assets at all; four operated with only one or two watch officers on duty.

Significant gaps in data

The structural conditions for data gaps are embedded in the nature of maritime migration itself. Many incidents occur far from shore; they involve vessels with no communication equipment, no transponders or radio beacons, and no registered link to any reporting authority; and they often leave no survivors, or survivors who are deterred from reporting by fear of immigration enforcement. The mortality data from the routes examined in this report highlights the absence of consensus on basic figures. On the Western Indian Ocean route, IOM's estimated 69 deaths in 2024 while the French Senate estimated 530 deaths per year as an historical average. On the Northwest African Atlantic route, the 10:1 divergence between IOM and Caminando Fronteras in 2024 reflects methodological differences but also the scale of uncertainty.

What these cases share is not a deficit of good intentions among rescue organisations, but the absence of the integrated reporting infrastructure that would be needed to reconcile information from the multiple actors—MRCCs, coast guards, naval units, commercial vessels, port

⁶⁷ International Civil Aviation Organisation (ICAO), Africa and Indian Ocean search and rescue plan (First edition, draft, version 2.0, 2021) section 7 <https://www.icao.int/sites/default/files/ESAF/APIRG/APIRG-24/Appendices/Appendix-3F-AFI-Search-and-Rescue-SAR-Plan.pdf>.

authorities, immigration services, and community networks—whose partial observations contribute to a more complete picture of any given incident.

The absence of good data on maritime migration compounds the challenges it presents. Without good data, we have less understanding of the scope and nature of the problem, both as a global phenomenon and as a local dynamic. This makes it more difficult to assess the scope and severity of the issue and to develop appropriate policy solutions. But the incomplete data picture also presents operational challenges that can result in lives lost. The challenge of data is not information for information's sake, but ensuring that SAR actors can effectively respond to save lives at sea.

Consistent state reporting

Assembling an accurate picture of maritime migration requires information from a variety of sources, with states and MRCCs as one of the most important actors. Currently, however, only a handful of states publicly report rescue data, and what is produced is often difficult to compare. Establishing stronger standards and expectations for state reporting on maritime rescues, particularly where migrants and refugees are concerned, is an important step in addressing data gaps.

Many coastguards and other active rescue providers will already collect this information, and those that do not will find useful templates in the IAMSAR manual. While operational security is always a concern for state actors, and some states will have particular sensitivities regarding migrant and refugee rescues, basic reporting is neither an operational nor a security risk.

What is missing is an overarching expectation that rescues are not solely an issue of national concern but, like AIS ship position or aviation incident data or World Health Organisation epidemiological statistics, provide insight into a larger international problem when aggregated and analysed.

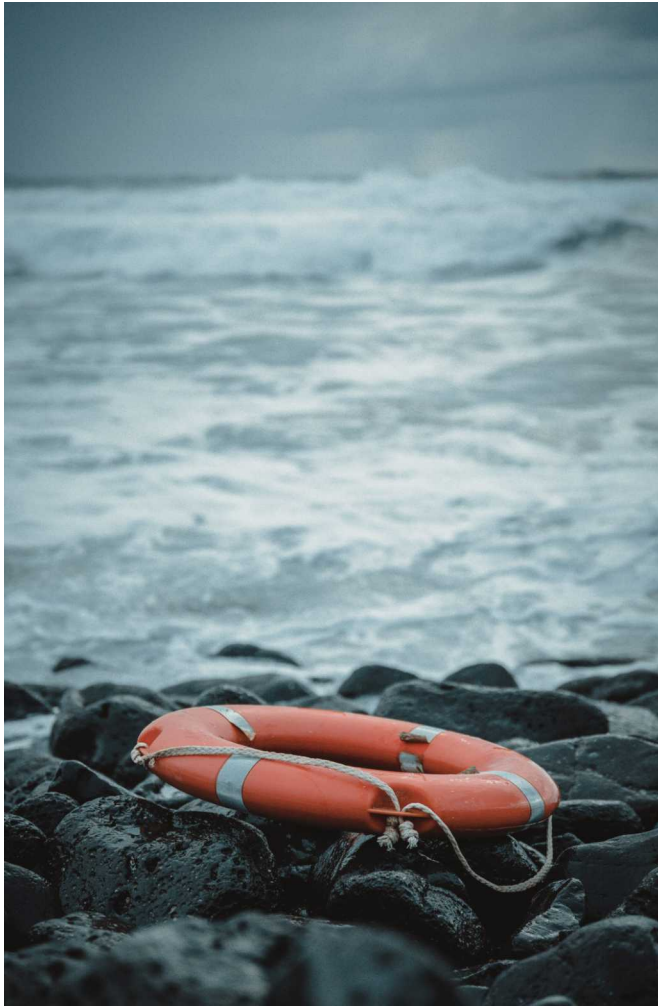
Reporting on commercial rescues

Many vessels transporting refugees and migrants encounter distress far beyond the coastal waters patrolled by coast guards and navies, resulting in frequent calls on commercial ships. Every MRCC surveyed by FHAS reported tasking commercial vessels during SAR operations. (Across respondents, the share of incidents involving merchant vessel coordination ranged from approximately 20% to 75%). Yet the information flows associated with commercial rescues are among the least well-systematised in the SAR architecture.

The coordinating MRCC should, in theory, have detailed information on rescues within its area of responsibility. These are, however, rarely available. A handful of countries, such as Spain, have transparent data on their maritime rescue operations, including of migrants and refugees, but they are very much the exception. IOM further reports that most governments also either do not collect or do not share data on the deaths of irregular migrants and refugees.⁶⁸

Where merchant vessels conduct rescues, the merchant vessel and its owners/operators are a second potential source of information. The reality, however, is that there is no system and few

⁶⁸ IOM, 'Our methodology' Missing Migrants Project (Undated) <https://missingmigrants.iom.int/methodology>.



incentives for reporting by merchant vessels. While ship masters will almost certainly be in touch with the shipping companies involved (potentially including shipowners, charterers, ship management companies), those companies have few incentives to make such information public. No general reporting requirements for shipping companies exist and, even if a company did want to report the noble work of one of its ships, there are no formal mechanisms apart from press releases. There is no general registry of merchant ship rescues nor any international standards or guidelines around reporting of rescue incidents.

The flag state of the rescuing ship is also a potential node in the information ecosystem. The master of a ship performing a rescue is generally expected to report incidents to the flag state administration under flag state law and the ISM Code, though there is no specific

obligation to report rescues. Some of the largest and best organised flag states, like the Republic of Marshall Islands, regularly issue public letters of commendation to captains and crews on their vessels that assist or engage in rescues (discussed further below). This is an important practice that creates a positive incentive for rescue and serves as a useful data source.

The SOLAS framework places the duty to rescue on the master of a vessel, and the SAR Convention places coordination responsibility on MRCCs. But neither instrument creates a requirement for systematic, standardised incident reporting in the aftermath of a commercial rescue involving migrants or refugees. This is a gap in the legal architecture that has significant practical consequences.

Strengthening coordination, operations, and information systems

Strengthening coordination

MRCCs are the central element of rescue and rescue coordination, but they currently receive little attention within the broader maritime system. The IMO Member State Audit Scheme (IMSAS) generally pays little attention to SAR in general and to MRCCs in particular. Even where attention is paid, there are few binding requirements or clear and scalable standards for MRCC performance.

Greater attention to MRCCs within IMSAS and the elaboration of guidance and standards for MRCCs are important, low cost steps that the IMO and its member states can take in the near term. The Global Maritime SAR System Review may be an opportune moment to initiate such changes.

Strengthening regional coordination

The international SAR framework calls for coordination between MRCCs but does not require it in any enforceable sense. The IAMSAR Manual encourages MRCCs to establish formal working



arrangements with neighbouring centres, provides detailed guidance on transferring coordination responsibility for a SAR operation across jurisdictional boundaries, and includes a template bilateral agreement for inter-MRCC cooperation.⁶⁹ The evidence from this report suggests these instruments are rarely used in practice on underserved maritime migration routes. The International Civil Aviation Organisation found in 2020 that 67% of states had not established the necessary coordination of their SAR organisations with those of neighbouring states.⁷⁰ This is supported by the results of the FHAS survey.

The contrast between high-income country relationships and countries on underserved migration routes examined in this report is also sharp. In Europe, the database maintained by the European Cooperation on Coast Guard Functions lists dozens of bilateral and multilateral SAR cooperation agreements among coastal states.⁷¹ On the Northwest African Atlantic route, the Western Indian Ocean route, the Gulf of Aden, and the Bay of Bengal, no equivalent architecture exists. Spain has signed agreements with Morocco and Mauritania that include SAR-adjacent provisions, but these are primarily security and civil protection instruments that do not establish the inter-MRCC operational protocols.⁷²

The absence of SAR-specific coordination on these routes is not an absence of regional cooperation generally: states on these routes already cooperate on maritime security, but such security cooperation almost never translates into meaningful cooperation on SAR. The regional mechanisms that do exist on these routes—the Djibouti Code of Conduct, the Yaoundé Code of Conduct, the Bali Process, and multinational naval operations—either completely exclude or pay little attention to mass rescue in their operational mandates.⁷³ Where regional frameworks engage with migration at sea, they primarily do so through the lens of enforcement and interdiction.

These deficits are real but could be addressed through a concerted diplomatic effort to support technical cooperation along major maritime routes. The SOLAS and SAR Conventions are framed in very generalist terms, without a specific geography or problem set. The modern world is quickly providing a set of important and concrete rescue challenges, however. The maritime

⁶⁹ See generally, International Civil Aviation Organisation (ICAO) and IMO, IAMSAR Manual Volume I (2010 version) <https://archive.org/details/5769977-Doc-9731-IAMSAR-Manual-Vol-I-Ed-2010-En>.

⁷⁰ International Civil Aviation Organisation (ICAO), Africa and Indian Ocean search and rescue plan (First edition, draft, version 2.0, 2021) section 7 <https://www.icao.int/sites/default/files/ESAF/APIRG/APIRG-24/Appendices/Appendix-3F-AFI-Search-and-Rescue-SAR-Plan.pdf>.

⁷¹ See European Cooperation on Coast Guard Functions (European Union), ‘Cooperation agreements and mechanisms’ (undated) <https://coastguard.europa.eu/cooperation-mechanisms/mechanisms>.

⁷² Spain and Morocco, *Agreement on Cooperation in the Field of Civil Protection and Prevention of Natural and Technological Disasters* (21 January 1987) 1695 UNTS 183, art 10 and Final Provisions <https://www.ifrc.org/docs/idrl/I253EN.pdf>; Kingdom of Spain and Islamic Republic of Mauritania, *Treaty of Friendship, Good Neighbourliness and Cooperation* (24 July 2008) (outlining potential for SAR cooperation but no specifics on real coordination) <https://www.boe.es/buscar/doc.php?id=BOE-A-2024-19575>.

⁷³ See generally, ‘The Bali Process’ (undated) <https://www.baliprocess.net>; See generally, IMO, ‘The Djibouti Code of Conduct’ (undated) <https://www.imo.org/en/ourwork/security/pages/content-and-evolution-of-the-djibouti-code-of-conduct>; Code of Conduct concerning the Prevention and Repression of Piracy, Armed Robbery against Ships and Illegal Maritime Activities in West and Central Africa (25 June 2013) <https://www.imo.org/en/ourwork/security/pages/dcoc.aspx>; Combined Maritime Forces, *About CMF* (Undated) <https://combinedmaritimeforces.com/about>; Council Joint Action 2008/851/CFSP of 10 November 2008 on a European Union military operation to contribute to maritime security in the West Indian Ocean and in the Red Sea (EUNAVFOR ATALANTA) (consolidated version) https://eur-lex.europa.eu/eli/joint_action/2008/851/2024-12-16/eng.



migration routes covered in this report, and others, can serve as an anchor for coastal states to focus their energies and coordinate their operations.

The foundations for this effort already exist. The legal mandate for such agreements is clear in the SAR Convention, and the IAMSAR Manual's template cooperation agreement provides a model that could be implemented by neighbouring states.⁷⁴ The 2000 Florence Agreement on SAR in Africa presents one possible model, where countries are brought together in a conference format. Such a discussion could take place at the route level, rather than continent-wide, for more concrete discussions. Where appropriate, existing agreements such as the Djibouti Code of Conduct can also be expanded, with their SAR elements strengthened. While some coastal countries along some routes may have political tensions with neighbours, the humanitarian imperative of rescue can and should overcome them. It should also be emphasised that while disembarkation and immigration policy is an important topic, disagreements on this issue should not impede progress on urgent, life-saving measures.

Strengthening operational capacity on underserved routes

Many high-income countries and adjacent regions have long maritime traditions and strong SAR capacity, and there is often an impression that this is representative of SAR all over the world. The reality, as set out in this report, is that there are many corners of the world where SAR coordination and capacity are lacking. Recent years have seen the growth of maritime networks to address challenges of security and law enforcement, but these often have little focus and even fewer resources for SAR. Greater attention is needed to support governments providing life-saving assistance.

⁷⁴ ICAO and IMO, IAMSAR Manual Volume I (2010 version) 2.2.10, 5.1.5, appendix I <https://archive.org/details/5769977-Doc-9731-IAMSAR-Manual-Vol-I-Ed-2010-En>; ICAO and IMO, IAMSAR Manual Volume II (2010 version) 3.6.7 <https://archive.org/details/iamsarmanualinte0000inte/page/n35/mode/2up>.

Multi-donor funds have been established in the past to support SAR and these initiatives should be reinvigorated. The IMO maintains an International SAR Fund, but currently this stood at a mere 37,000 USD in 2023, a tiny account compared to the scale of need.⁷⁵ In contrast, security-focused funding mechanisms are much better resourced. The Djibouti Code of Conduct trust fund stood at more than 13 million USD in 2009, but, as noted above, this Code of Conduct agreement is primarily a maritime security initiative.⁷⁶

The contributions from traditional donor states to development funding have dropped precipitously in recent years, hitting low-income states particularly hard. Yet opportunities exist through blended finance partnerships between public and private sector actors. While SAR does not have a traditional revenue stream to leverage for the most common private sector finance models, the potential direct benefits to the shipping industry may hold sufficient value to attract modest investments that supplement state funding.

Strengthening data and reporting

The lack of reliable data remains a significant challenge in the mass rescue of migrants and refugees. Some of these challenges are inherent and difficult to overcome, but many arise simply from a fragmented systems of information collection and reporting. There are a set of modest changes to current SAR reporting standards and data platforms that can address this ‘low hanging fruit’, enabling far greater transparency into SAR systems, providing a greater sense of the scope of the challenge to saving lives at sea and enabling the identification of solutions.

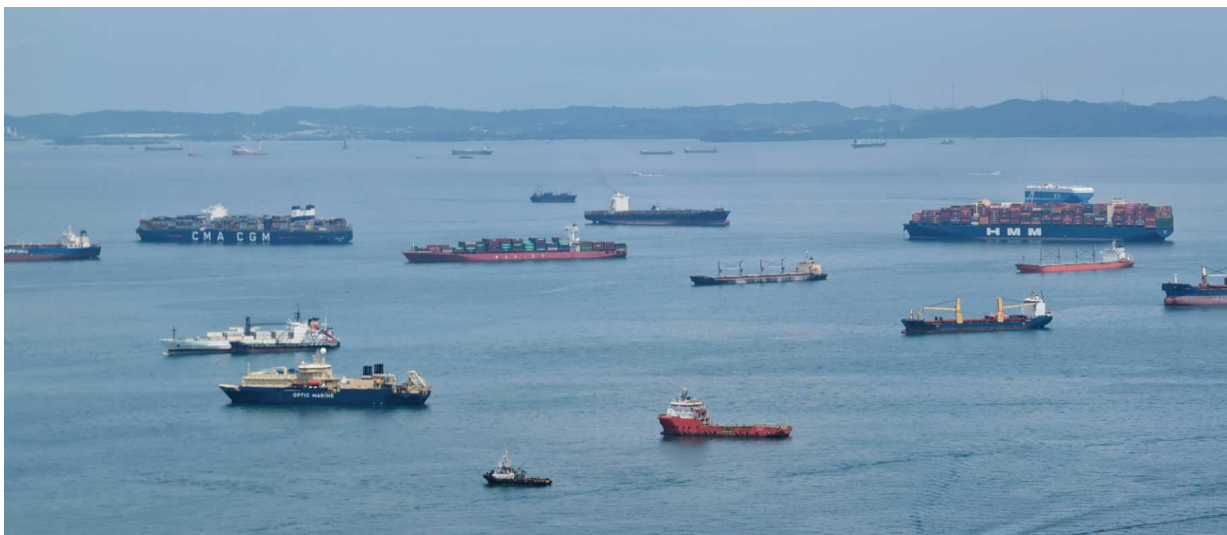
SAR reporting by states

Currently, reporting on SAR incidents by state actors is not standardised. Some coast guards publicly report all rescues in detail, some publicly release summaries, but many release little or no public data. Establishing even non-binding standards and expectations for state reporting on rescues, particularly where migrants and refugees are concerned, could substantially improve general understanding of rescue and maritime migration.

Establishing reporting standards will also require agreeing on a typology of data to report. Currently, one of the significant challenges in comparing rescue data is that many SAR organisations use and report different data, with few agreed standards for time/duration or other factual elements. While some facts like the number of people rescued are straightforward, it becomes more complex if we want to categorise those people: are they ‘migrants and refugees’, or ‘passengers’, or even ‘suspected criminals’? Should the age and sex of rescued people be reported? Should nationalities be recorded, even if this risks placing the rescued person in danger? There are many possible ways to describe rescue incidents and experts need to agree and endorse a standardised vocabulary.

⁷⁵ InterManager, Summary of the Maritime Safety Committee 109th session (December 2024) <https://www.intermanager.org/wp/wp-content/uploads/2024/12/IMO%20MARITIME%20SAFETY%20COMMITTEE%20109th%20Session,%202-6%20December%202024.pdf>. Note that there very little public information available on the IMO’s International SAR Fund, including when it was established, its mandated purpose, its donors, or when and for what its funds have been distributed.

⁷⁶ IMO, Report of the Technical Committee on its tenth session, TC/60/13 (28 June 2010) para. 4.2 <https://www.imo.org/en/mediacentre/meetingsummaries/pages/tc-60th-session.aspx>.



SAR reporting by merchant vessels

Reporting by merchant vessels on SAR is almost completely ad hoc. While such reports are likely made in many cases to company headquarters and possibly to flag states, the extent and existence of such reports is unclear. This reporting can and should be made more consistent. Flag states deserve particular attention as contributors and as an institutional entry point, particularly the efforts of the Republic of the Marshall Islands. The Republic of the Marshall Islands has issued public letters of commendation and recognition to vessels flying their flag who assist or undertake a rescue. This serves as a positive incentive that strengthens the global SAR system, and as a public data point that helps us better understand maritime migration.

SAR reporting platform

One major obstacle to improving SAR reporting is that there is currently no agreed recipient for such reports, but this is a readily solvable problem. Even if a state MRCC, or a flag state, or a shipping company, wants to share their data, they have no option except to simply release themselves, with little indication that it will be used for any greater purpose. The IMO and IOM established an interagency platform in 2015, but it has sat mostly unused for more than ten years. When FHAS sought more information on this platform, even interlocutors within the two respective organisations had not heard of it and could not answer questions about it. What the IMO/IOM effort shows, however, is that such a platform is possible in principle, if it is supported with the requisite ownership and follow-through.

FHAS and the Maritime Search and Rescue Council have created a pilot platform, Maritime SAR Tools (maritimesartools.com), to fill this gap. This platform is designed to receive and analyse rescue incident data from a wide range of actors. MRCCs, shipping companies, flag states, and others, can register as certified users to log rescue data. This platform, if used, will produce a more complete overview of maritime rescue and the assistance of merchant vessels. A key factor at this stage is generating the awareness and buy-in for participation among major states and other actors.

Recommendations and conclusions

The four maritime routes examined in this report differ in geography, politics, and migration dynamics, yet they reveal a common reality: the international search and rescue system is far less comprehensive than it often appears. Along some of the world's busiest and deadliest migration corridors, rescue governance remains fragmented, operational capacity is limited, and critical information gaps obscure both the scale of movements and the true human cost of maritime migration.

The international legal framework established through UNCLOS, SOLAS, and the SAR Convention provides an important foundation. Yet across the Western Indian Ocean, Northwest Africa, the Bay of Bengal and Andaman Sea, and the Gulf of Aden, the challenge is not the absence of legal principles but the absence of the operational and cooperative structures needed to translate those principles into timely life-saving action.

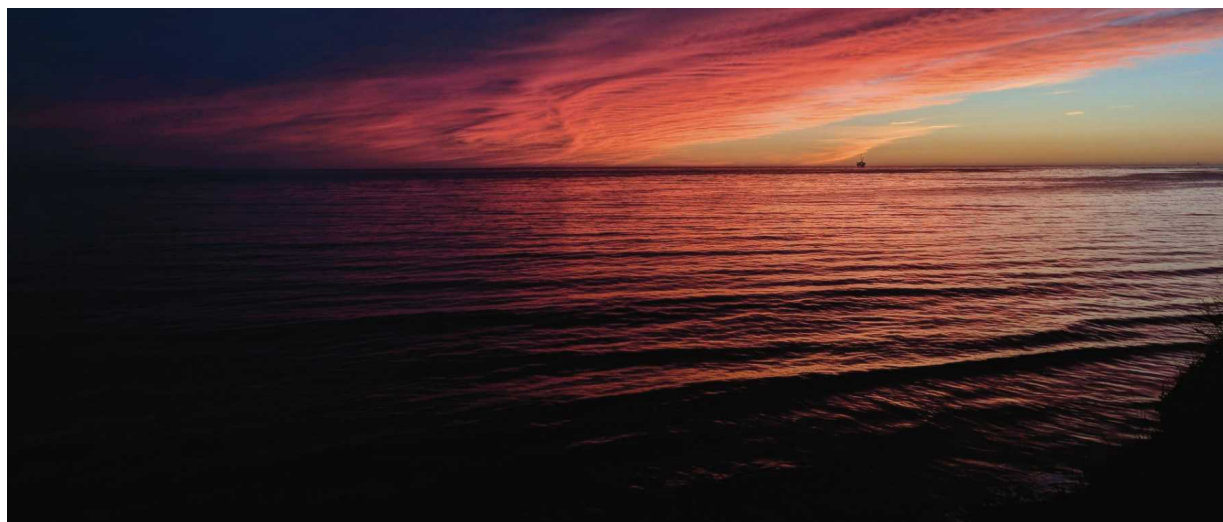
This concluding chapter distils the detailed findings and proposals developed throughout this report into four recommendations, organised by the actors best placed to act on them:

IMO & MEMBER STATES

01

The IMO and its member states should elaborate baseline standards for national SAR systems, including MRCCs, and give national SAR systems greater attention in IMSAS audits.

National SAR systems, and the MRCCs at their centre, are too important to be governed only by the limited requirements of the SAR Convention and the non-binding guidance of the IAMSAR Manual. While the resources and maritime traditions of different countries mean that SAR capacity will always vary, baseline standards should be elaborated for the core elements of a national SAR system, including governance, planning, MRCC functions, communications, and coordination. These requirements can be assessed more regularly through the IMO Member State Audit Scheme (IMSAS).



This recommendation addresses the broader challenge of national SAR system capacity and accountability through two complementary tracks: standards and audits. While MRCCs should remain the principal institutional focus, standards should also encompass the wider components of national SAR systems, including governance arrangements, national SAR plans, communications infrastructure, coordination mechanisms, and the network of SAR units. IMO's IMSAS audit mechanism provides an opportunity to assess these elements more systematically and encourage progressive improvement. While a full IMSAS audit of MRCCs may need to wait for established standards, IMSAS review of MRCCs based on non-binding IAMSAR guidelines will provide an important baseline and can also contribute to the development of binding standards.

Although standards will inevitably need to be proportionate to national circumstances, establishing common baseline expectations would strengthen accountability while preserving flexibility in implementation. FHAS and the IMRF can meaningfully contribute to this process respectively through convening dialogues and the Global Maritime SAR System Review.

COASTAL STATES & PARTNERS

02

Coastal states and relevant partners should strengthen regional coordination through bilateral and multilateral agreements.

The SAR Convention creates the framework for international cooperation but practical coordination takes place between specific countries on specific waterways. Developing bilateral and multilateral SAR agreements, clear procedures for cooperation between neighbouring MRCCs, and regular dialogue among maritime authorities can strengthen route-based coordination. Many regions already demonstrate that such cooperation is possible on matters of security; extending these approaches to underserved migration routes would significantly improve the coherence of the rescue architecture.

Concrete actions on this recommendation will be route-specific, with the precise nature of agreements tailored to movement dynamics and state interests. FHAS dialogues in the Western Indian Ocean and Northwest Africa show that coastal states and other key actors can be brought together to discuss maritime movements of refugees and migrants. These efforts can be built upon in these locations and replicated in others.

STATES, PARTNERS, AND THE PRIVATE SECTOR

03

States, multilateral organisations, and the private sector should strengthen operational capacity through dedicated funding.

Greater investment is needed in operational capacity. Many of the routes examined are served by MRCCs with limited personnel, communications challenges, and insufficient maritime and aerial assets. While maritime security initiatives often receive substantial funding, the same level of attention has rarely been directed toward search and rescue, despite the central role SAR plays in preserving life at sea. Expanding SAR capabilities will require sustained support

from governments, donors, and regional organisations. The broad contraction in international assistance is a grim reality, however, and calls for creative thinking, potentially including involving the private sector.

To improve operational capacity, multi-donor SAR funding mechanisms should be reinvigorated. Public authorities retain primary responsibility (a SAR Convention obligation that cannot be delegated), but can be supplemented by blended finance contributions from the private sector, which has a direct, practical, and humanitarian interest given how often commercial vessels are tasked with rescues.

The first step is to map existing funding mechanisms and precedents, identifying opportunities to adapt and expand them for underserved maritime migration routes. FHAS and its partners are currently taking steps to initiate this research.

FLAG STATES, COASTAL STATES, AND THE SHIPPING INDUSTRY

04

Flag states, coastal states, and the shipping industry should work together to improve reporting on maritime rescue and utilise a common SAR data platform like Maritime SAR Tools.

Significant uncertainty surrounds even the most basic indicators of maritime migration, including the number of people lost at sea. Improving reporting by states, MRCCs, and merchant vessels, encouraging greater transparency regarding rescue operations, and developing mechanisms to consolidate information from multiple actors would help create a more accurate picture of maritime movements and SAR outcomes.

Improving data requires two distinct but complementary steps: first, draw on the model of flag states like the Republic of Marshall Islands to strengthen public reporting; this reporting can easily be replicated by MRCCs and others. The engagement of major flag states and the shipping sector are a key part of this initiative. FHAS dialogues provide an important forum to make these connections.

Second, establish consensus on a SAR data platform like Maritime SAR Tools (maritimesartools.com) from FHAS and Maritime Search and Rescue Council initiative. Coastal states along the Western Indian Ocean and Northwest African Atlantic routes have already begun to use this platform. This collaboration will involve all potential SAR actors, from the shipping industry to coastal states, to civil society. This platform can be iterative, however, and does not require universal consensus at the start. The more actors that contribute, the more useful the tool will be for all involved.

Conclusion

The duty to save life at sea remains one of the oldest and most widely shared principles of maritime practice. Strengthening the governance institutions, partnerships, and information networks that support that duty is both a humanitarian imperative and a practical necessity for the future of maritime governance.

Annex: List of acronyms

ASEAN	Association of Southeast Asian Nations
CNAEM	Comoros National Centre for State Action at Sea
FHAS	Foundation for Humanitarian Action at Sea
GCM	Global Compact for Safe, Orderly and Regular Migration
GMDSS	Global Maritime Distress and Safety System
IAMSAR	International Aeronautical and Maritime Search and Rescue
ICAO	International Civil Aviation Organisation
IMO	International Maritime Organisation
IOM	International Organisation for Migration
IMRF	International Maritime Rescue Federation
IMSAS	IMO Member State Audit Scheme
JRCC	Joint Rescue Coordination Centre
MRCC	Maritime Rescue Coordination Centre
SAR	Search and rescue (also, International Convention on Maritime Search and Rescue)
SOLAS	International Convention on the Safety of Life at Sea
SRR	Search and Rescue Region
UNCLOS	United Nations Convention on the Law of the Sea
UNHCR	United Nations High Commissioner for Refugees
UNODC	United Nations Office on Drugs and Crime

Geneva, September 2026

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About FHAS

The Foundation for Humanitarian Action at Sea (FHAS) works to protect the lives and rights of migrants, refugees, and seafarers through research, dialogue, and practical engagement with the shipping industry, governments, and international organisations. Learn more about our work at www.fhas.ch.

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