

Navigating Jurisdictional Tides: Reconciling UNCLOS with Bilateral Fishing Rights in the India–Sri Lanka Maritime Boundary

Jasmine Subasini. A, S. Anandha Krishna Raj*

Research Associate at VIT School of Law, VIT University, Chennai, Tamil Nadu, India

E-mail: jasminesubashine.2023@vitstudent.ac.in

Associate professor at vit School of Law, VIT University, Chennai, Tamil Nadu, India.

E-mail: anandha.krishnaraj@vit.ac.in

*Corresponding Author: S. Anandha Krishna Raj

Abstract: The India–Sri Lanka maritime boundary dispute precariously rests at the intersection of international law and constitutional federalism, alongside human rights. While the United Nations Convention on the Law of the Sea (UNCLOS) takes a holistic approach to maritime jurisdiction, the realities of Tamil fishing communities on the ground demonstrate the disconnect between codified sovereignty and customary usages. The 1974 and 1976 bilateral treaty agreements between India and Sri Lanka that transferred Katchatheevu to Sri Lanka resulted in significant and enduring legal ambiguities and humanitarian complexities that undermined sovereignty-based customary fishing. This article describes the evolution of traditional transboundary violations and increased constitutional conversations in India about the legitimacy of ceding territory in the absence of Parliament approvals. It frames UNCLOS Articles 19, 21, and 56 against practices of historic use, and argues that sovereignty claims and historic use can co-exist in semi-enclosed areas such as the Palk Bay. The analysis demonstrates that treaties were compliant, but concurrently there was a legal void with respect to livelihoods and cultural rights, exacerbating ongoing arrest/detention and ecological issues, and demonstrating the lack of resolution between treaty obligations and customary rights. By situating the issue in an international and constitutional law framework, the article concludes with a clarion call for jurisdictional certainty, human rights, and socio-economic justice.

Keywords: Bilateral treaties; Human rights; India-Sri Lanka relations; Katchatheevu; Traditional fishing rights; UNCLOS.

INTRODUCTION TO THE MARITIME LEGAL DISPUTE

Research Problem and Relevance to International Law

The maritime boundary dispute over fishing rights in the Palk Bay area and Katchatheevu between India and Sri Lanka is a complex nexus of international legal obligations, bilateral treaties, and customary rights. The United Nations Convention on the Law of the Sea (UNCLOS) establishes the jurisdiction of the sea, but part of it remains unclear with regard to traditional fishing and the rights of the coastal community. (Jose, 2024a) The 1974 and 1976 maritime agreements between India and Sri Lanka that divided Katchatheevu to Sri Lanka had broad implications for the fishing rights of Tamil Nadu fishermen. In India, this brings constitutional challenges as this raises design issues with ceding territory. (Mukul, 2025) Arrests, detainments of trawlers, and human rights abuses show a sense of expectation on the intersections of humanitarian law, as sovereignty claims must be tempered with the livelihood and dignity of fisherfolk. (Acharya, n.d.)

Statistical evidence emphasizes the nature of the issue. Since 2000, Sri Lankan authorities have arrested more than 6,000 Indian fishermen and seized over 1,100 fishing vessels, with 237 vessels and 80 fishermen currently, as of 2025. (Rameswaram Fishermen Announce Indefinite Strike after Sri Lankan Navy Arrests Eight, 2025a) The number of cross-border arrests each year clearly exhibits the historical livelihood issue, with an average between 150 and 200 each year, according to the Ministry of External Affairs. (QUESTION NO. 632 FISHERMEN

HARASSED BY SRI LANKAN PERSONNEL, n.d.) It is important to note that Tamil Nadu accounts for almost 20% of India's total marine fish production on the east coast; Palk Bay employs directly more than 200,000 fishers daily, with another 800,000 persons indirectly. (Bureau, 2025) This reality identifies this as an issue of state sovereignty and a humanitarian, socio-economic, and pressing issue. Additionally, Tamil Nadu political opposition to the agreements adds to federal issues in India, thus making the dispute not only a bilateral territorial issue, but also a constitutional one. Both UNCLOS and bilateral terms make this dispute deserving of attention in regard to these layered UNCLOS (meant to be one issue) obligations.

Objectives, Methodology, and Scope

This article sets out to achieve three principal aims. Firstly, it investigates the historical treaty context and ongoing operation of treaty law, concentrating on the treaties between India and Sri Lanka in 1974 and 1976. Secondly, it explores the context of UNCLOS and its inability to regulate traditional fishing rights - specifically provisions of UNCLOS provisions that delineate coastal state jurisdiction (i.e., Articles 19 and 21). Thirdly, it realizes the potential space for reconciling two forms of law, international law and bilateral treaty law, with adequate consideration for human rights law and ecological sustainability. The methodology adopted in this article is doctrinal legal research, supplemented with socio-legal perspectives and case studies based on current journalistic and policy reports. The evidence used is sourced from international treaties, state practice, case law, and the parliamentary debates of India and Sri Lanka, in addition to secondary literature. The jurisdiction of inquiry is both international and domestic – international due to the nature of the UNCLOS and bilateral treaties – and domestic due to the nature of the respective constitutional paradigm of India, such as Tamil Nadu's part in compliance with the treaties.

The value of the analysis lies in the potential for harmonizing a legal framework, whereby the substantive law of the UNCLOS treaty, the bilateral treaties, and constitutional law intermingle to resolve disputes such as the case involving the Palk Bay. To orient the issues within a larger legal and humanitarian context arguably serves to promote doctrinal clarity in a research and policy goal of international maritime law.

HISTORICAL TREATY FRAMEWORK AND STATE PRACTICE

The Indo–Sri Lanka Maritime Agreements -1974 and 1976

In the 1970s, the maritime alignments between India and Sri Lanka underwent a definitive shift with two agreements that still influence the dispute today. The first was the 1974 Indo-Sri Lankan maritime boundary agreement executed between Indian Prime Minister Indira Gandhi and Sri Lankan Prime Minister Sirimavo Bandaranaike. This agreement defined the maritime boundary extending from the Palk Strait to Adam's Bridge and recognized Katchatheevu Island as Sri Lanka to the extent that it made Sri Lanka sovereign over Katchatheevu. (Mukul, 2025) The Agreement further recognized that each of the two states would have sovereignty and exclusive jurisdiction on the waters, continental shelf and subsoil on their respective side of the boundary. While it actually allowed for Indian fishermen and pilgrims to visit Katchatheevu without tokens, it explicitly did not preserve fishing rights, creating confusion over established claims. (Desk, 2024) In 1976, the Agreement that crystallized this demarcation divided the Sethusamudram area and provided exclusive rights to both. This treaty stressed that both sides would have sovereign rights over living and non-living resources within their respective maritime zones and revoked the implicit fishing access confirmed in 1974. (Mukul, 2025) In 2024, External Affairs Minister S. Jaishankar re-emphasized, noting the 1974 agreement permitted Indian fishermen to some customs, including feasts, boats and living expenses. Implicitly, all activities were not available after 1976. (Rameswaram Fishermen Announce Indefinite Strike after Sri Lankan Navy Arrests Eight, 2025a)

For centuries, Tamil fishing communities, whether located on Katchatheevu or elsewhere, used the waters surrounding Katchatheevu as a shared space for use. Fishermen would dry their nets on the island, and pilgrimage parties on their way to Katchatheevu would stop on the island to camp. The new boundary regimes criminalized these uses. The new regulations also resulted in repeated arrests, detentions, and confiscation of vessels by Sri Lankan authorities. (Saha, 2024) Between 2000- 2025, Indian authorities detained over 6,000 Indian fishermen and confiscated over 1,100 vessels, illustrating how what were clearly mundane day-to-day livelihood pursuits became incursions into state territory. (Mukul, 2025)

Cession Of Katchatheevu And Constitutional Debates

The ceding of Katchatheevu has occupied a significant place in the constitutional conversations in India. Of all inhabited islands in the Palk Bay region of southern India and northern Sri Lanka, Katchatheevu has also gained attention from scholars for its nascent legal history, and there are varying accounts of its constitutional status. Katchatheevu became an Isle of Romance when it was part of the Ramnad Zamindari, which was eventually leased to the Dutch in 1767 and to the British East India Company in 1822, which India has used to pursue historic claims of possession. (Katchatheevu Island Dispute, n.d.) Sri Lanka cites the Catholic Church on the island to frame its assertion of sovereignty with ties back to the Diocese of Jaffna.(Desk, 2024) The legal problem of cession arose from the periodic judgment of the Berubari Union case (1960), in which the Supreme Court of India observed that cession of territory entails an amendment to the Constitution under Article 368. Here, it is held by critics that the Union Government evaded constitutional procedure because it did not procure an amendment in 1974. The Centre asserted that it also did not require an amendment, framing the treaty as a settlement of boundary, not a cession of territory. In scholarly discussion, the interpretation of the treaty as a settlement, rather than a cession, remains contested. ("Katchatheevu," 2024)

While the state is the directly aggrieved party, Tamil Nadu has effectively prodded the respective governments. Chief Minister M. Karunanidhi voiced opposition to Katchatheevu in 1974, along with Chief Minister M. K. Stalin in 2025, and has stridently contested the cession. The Tamil Nadu Legislative Assembly, with respect to cession, has issued several resolutions in the years 1974, 1991, 2013, 2014, and 2025. The resolutions express perceptions of injustice for loss of traditional fishing and demand an "indication" to revisit the agreement. (Get Back Katchatheevu, Save Our Fishermen, n.d.) The Governor R. N. Ravi characterized the treaty hewed out to Katchatheevu as "iniquitous" and is primarily responsible for undermining fishermen's rights.(Mukul, 2025) Politically, ceding Katchatheevu remains a national issue. Prime Minister Narendra Modi decried the Congress government for "destruction of the integrity of India," especially ahead of the 2024 Lok Sabha elections.(Mukul, 2025) Both the BJP as well as opposition parties in Tamil Nadu utilized the issue as a rallying emotional point in electoral campaigns. Ceding Katchatheevu is framed in the parlance of sovereignty and livelihood.

While uninhabited and barren, the strategic location of Katchatheevu makes it even more important. It is located about 22 km away from Tamil Nadu and 45 km from Jaffna. Historically, ceding the island has extended the exclusive economic zone of Sri Lanka at Katchatheevu and devastated a site of traditional fishing for Indian fishermen. (Katchatheevu Island Dispute, n.d.) Academic scholars assert that there were much higher collateral bases for constitutionality and economically based exchanges to resound in consideration of state practice. Even a minuscule land mass such as Katchatheevu carries a heavy constitutional history of sovereignty and livelihoods. (Saha, 2024)

Timeline of Jurisdictional and Fishing Rights Issues: India–Sri Lanka Maritime Boundary (1974–2025)

The maritime boundary dispute between India and Sri Lanka reflects the continuing contestation between codified international law and customary lived practices. Though the United Nations Convention on the Law of the Sea (UNCLOS) and bilateral treaties aimed to codify jurisdiction, the development also displaced customary fishing rights in the Palk Bay area of practice that had existed for millennia. The timeline below identifies key legal, political, and environmental developments that have deviated from the trajectory of the dispute from 1974–2025.

Table 1 : Timeline: Key Events and Developments (1974–2025)

Year	Legal and Political Development	Implications and Outcomes
1974 & 1976	Bilateral agreements demarcate the International Maritime Boundary Line (IMBL); Katchatheevu ceded to Sri Lanka	Traditional fishing rights for Indian fishers recognised in 1974 but formally restricted in 1976.(Adams, 2015)
1983–2009	Sri Lankan civil war; fishing bans imposed in northern Sri Lanka	Sri Lankan fishers restricted; Indian trawlers increase activity in Palk Bay.(Amaralal et al., 2021)
1994	Sri Lanka ratifies UNCLOS	Sri Lanka asserts an EEZ of 200 nautical miles, nearly 7.5 times its land area.(Joseph, 2003)

2009	End of Sri Lankan civil war; resumption of Sri Lankan fishing in Palk Bay	Renewed competition and conflict between Indian and Sri Lankan fishers.(Sarvananthan, 2018)
2016	Data on Indian trawler activity	1,000–1,500 Indian trawlers enter Sri Lankan waters three days/week; ~1,900 tons shrimp and ~4,000 tons demersal fish caught.(Dodangodage, 2017)
July 2017	Sri Lanka bans bottom trawling	Ban targeted at sustainable fisheries and curbing environmental degradation.(Sivaramanan, 2023a)
2020	Indian trawler fleet expands	2,650 Indian trawlers active in the Palk Bay; arrests and calls for joint governance escalate.(Vincent, 2020)
2023	Escalating environmental and legal concerns	Indian incursions cause millions of USD in losses for Sri Lankan fishers; overexploitation threatens regional fish stocks.(Sivaramanan, 2023b)

The dispute remains an ecosystem decline, a humanitarian burden, and a dispute to international legal regimes. Respectively, four trends are most salient:

- Ongoing breaches: Indian trawlers routinely transgress into Sri Lankan waters to the detriment of livelihoods and ecological integrity. Arrests and detentions are common, but no lasting solutions are being formed.(Dodangodage, 2017)
- Ecological collapse: Marine scientists project that overfishing may lead to the collapse of Palk Bay fish stocks by 2025 if collective action is not taken. This collapse will fundamentally impact local livelihoods and regional food systems.(Wang & Xue, 2023a)
- Policy and governance: Sri Lanka announced a ban on bottom trawling in 2017 and has shown interest in a joint fisheries governance framework, which shows some institutional shift towards sustainability. However, issues with implementation and weak enforcement capacity continue to pose obstacles to success. (Vincent, 2020)
- Uncertainty: Traditional fishing rights are ambiguous under UNCLOS. India raises historical rights, and Sri Lanka argues for the primacy of treaty law in this situation, which creates a void that is actively creating disputes/contestations for a foreign concept or established framework. (Wang & Xue, 2023b)

UNCLOS AND CUSTOMARY INTERNATIONAL LAW DIMENSIONS

Jurisdictional Allocation Under UNCLOS Articles 19, 21, And 56

The United Nations Convention on the Law of the Sea (UNCLOS), which has been ratified by both India and Sri Lanka, is the primary source for delimiting maritime zones and regulating activities in them. The provisions which are most relevant to the dispute in the Palk Bay are Articles 19, 21, and 56.

Article 19 states that foreign passages through territorial seas can only be considered ‘innocent’ passage if it is not prejudicial to the peace, good order, or security of the coastal state; thus, fishing by foreign vessels in territorial seas is non-innocent.(Jose, 2024b)

On the other side of the disputed maritime zone, Sri Lanka asserts that Indian trawlers that cross the International Maritime Boundary Line (IMBL) constitute illegal incursions which threaten its sovereign rights.

Article 21 gives rights to coastal states to make laws and regulations relating to navigation, the conservation of living resources, the protection of the marine environment and the prevention of infringement of its rules. Sri Lanka has relied on this article to legally justify the extensive patrols of its navy, arrests of Indian fishermen, and confiscation of their vessels.(“50 Years of Emergency,” 2025)

Article 56 gives coastal states sovereign rights in the Exclusive Economic Zone (EEZ) to explore, exploit, conserve, and manage its natural resources. These provisions support Sri Lanka’s argument that Sri Lanka has

exclusive reach into the fisheries resources around Katchatheevu. From a legal perspective, UNCLOS appears to settle the issue in favour of exclusivity and sovereignty rather than collective or historical rights upon the establishment of EEZs.

India asserts, however, that these provisions must be tempered with historical fishing practices. Tamil Nadu fishermen had a longstanding tradition of use of Katchatheevu waters long before the bilateral treaties of 1974 and 1976. Their crosses to this day are not just situational economic needs but also due to an *opinio juris* that these practices are legally valid in normalcy. (Song & Soliman, 2019) This highlights the difficulty reconciling the provisions of UNCLOS with previously accepted customary rights in semi-enclosed seas such as the Palk Bay.

The Grey Zone of Traditional Fishing Rights and Customary Practices

One of the many questions at the heart of the India –Sri Lanka situation is whether traditional rights of fishing can be considered an aspect of customary international law that can exist outside a treaty. UNCLOS acknowledges historic rights in narrow cases (archipelagic waters, straits used for international navigation and so on), but it is noticeably void of provisions for border-related artisanal fishing sovereign rights. (Kwiatkowska et al., 2021) It isn't hard to see how scholars connect traditional rights of fishing over time and uninterrupted practice (especially those traditional to food sovereignty and resilience) into customary international law. The fishermen of Rameswaram and Jaffna have a shared history and culture, and this is predicated on demarcated maritime boundaries. Fishing was not infrequent or isolated, but regular and customary, which legitimizes them as customary rights. (Song & Soliman, 2019) Sri Lanka claims that the 1974 and 1976 maritime treaties extinguished these rights, as sovereign rights were definitive through Colombo. Therefore, fishing and Sri Lankan infringement was considered trespassing on Sri Lanka's territorial sea and EEZ. The literal interpretation of UNCLOS supports this position, as once boundaries were recognized or agreed, informal rights are minimized. (Mukul, 2025) The result is a grey zone, where the law is either missing in how codified sovereignty is reconciled with freshwater fishing customary practices. For Tamil Nadu fishing, this has meant arrests, confiscation of boats, and uncertainty in the livelihoods. As of 2025, there were over 237 boats and 80 fishermen were reported to have been detained by Sri Lanka. (Rameswaram Fishermen Announce Indefinite Strike after Sri Lankan Navy Arrests Eight, 2025b)

Fishermen associations will discuss how the overarching context is not only economic violations but also the weakening of identity; now Tamil fishing for generations has become historically connected to fishing in Palk Bay. The gap in doctrinal law has real implications. The consistent arrests are a source of heightened Tamil Nadu public interest, which develops political mobilization and calls for a retrieval of Katchatheevu, while Sri Lankan fishermen have noted starvation due to Indian trawlers' destructive trawling practices. (Thangavelu, 2017) Legalities are invoked - India claims rights to territorial usage, Sri Lanka's claims, dependency on treaty and UNCLOS are called upon. Neither mode tenders a framework that resolves confrontation between generations of fishing.

BILATERALISM AND CONSTITUTIONAL FEDERALISM IN INDIA

Role of the Union Vis-À-Vis Tamil Nadu in Treaty-Making

The power to negotiate and conclude treaties is exclusive to the Union Government in India's constitutional framework. Article 246 in conjunction with Entry 14 of the Union List states that foreign affairs and treaties are a Parliament-only subject. Thus, even if Tamil Nadu bears the consequences of a maritime treaty agreement, they do not have a constitutional right to formally join the treaty-making process.

Practically speaking, Tamil Nadu's framework has been that of a petitioning state government. Tamil Nadu's Chief Ministers, from M. Karunanidhi through M. K. Stalin, have had to resort to letters to the Prime Minister or External Affairs Minister, exhorting them to act on behalf of Tamil Nadu's fishing communities. (FOUNDATION, n.d.) In 2025, for example, CM Stalin reaffirmed Tamil Nadu's position regarding Katchatheevu with PM Modi, mentioning Assembly resolutions and the ongoing imprisonment of fishermen; he indicated that it was a matter of time. (Get Back Katchatheevu, Save Our Fishermen, n.d.) The exclusive competence of the Union has, however, caused tensions in India's federal structure. Tamil Nadu's state governments have argued that the Union took unilateral action in ceding Katchatheevu to Sri Lanka in 1974, without state legislature consultation.

The lack of institutionalised consultation mechanisms at the state level on external affairs raises a bigger issue of the nature of India's federalism. Comparative constitutional scholarship has called for subnational federal systems such as Canada or Australia, allowing subnational actors participation in treaties where local rights are impacted directly. Conversely, the rigidity of the Indian system relegates Tamil Nadu's actors to make a whole detour of petitions, protests, aside and Assembly resolutions.

The limitations of the lack of consultation have inflicted real-life consequences. Fishermen's associations assert that ratified treaty state rights, effective fishermen groups, where state rights are directly in question, unsuccessfully achieved state recognition at treaty negotiations, and furthermore, the ongoing issue of fishermen imprisonment, as a tragic issue, is socially and economically dependent on Tamil Nadu coastal communities have the importance placed on the state role. (Rameswaram Fishermen Announce Indefinite Strike after Sri Lankan Navy Arrests Eight, 2025b) This alienation has led not only to the question of the legitimacy of democracy, but it has encouraged repetitive diplomatic and domestic confrontations.

Judicial and Parliamentary Scrutiny of Maritime Treaties

The judiciary has been an essential feature of the conversations around the legality of India's maritime treaties. The most significant judgment in point was in the *Berubari Union* case (1960) where it was decided that cession of territory of India requires amendment to the Constitution under Article 368. Following this case, scholars and Tamil Nadu politicians have claimed that cession of Katchatheevu in the 1974 agreement was unconstitutional as it was done without amending the Constitution. The Union Government, on the other hand, maintains that this cession was simply a boundary delimitation process and did not represent a transfer of territory. (Mukul, 2025) This technical defence has been heavily critiqued in the legal literature as undermining constitutional protections.

In Parliament, this has generated extensive debate over decades. MPs from Tamil Nadu reacted angrily at the time of the 1974 agreement, primarily on the grounds that it would undermine the fishermen's traditional rights. Later discussions in 1991, 2013, 2014, and most recently in 2025 revealed continued bipartisan interest in what the agreements meant. (Get Back Katchatheevu, Save Our Fishermen, n.d.) In 2024, S. Jaishankar, the External Affairs Minister, stated in Parliament that the 1976 treaty legally terminated traditional fishing rights and thus reignited backlash, especially tumultuous accusations of historical negligence against the Union, from opposition members of Parliament. The Tamil Nadu Legislative Assembly brought much of this parliamentary debate to life by passing a barrage of resolutions calling for grabbing of Katchatheevu. While none are legally binding on the Union, they also highlighted a certain federal dissonance between New Delhi and Chennai. In April 2025, the Assembly passed resolutions calling once again for the return of Katchatheevu, as the fishermen had repeatedly been arrested and deprived of livelihoods. (Get Back Katchatheevu, Save Our Fishermen: MK Stalin Writes To PM Modi, n.d.)

These judicial and parliamentary deliberations expose a broader constitutional conundrum. The state better suited for the exercise of treaty-making power in India is states, as the costs are usually exacted in particular states. In a sense, Tamil Nadu has endured the consequences of enforcing maritime law through arrests, boat confiscation, and degraded diplomatic relations, while lacking political structures with authority in amending the treaty. The judiciary's narrow interpretation and Parliament's limited measure of correcting the Union have left this constitutional question unfixed and continue the dissonance of international compliance and domestic federal accountability.

HUMAN RIGHTS AND SOCIO-ECONOMIC JUSTICE

Arrests, Detentions, and The Rights of Fishermen

The maritime boundary dispute between India and Sri Lanka is more than just a question of sovereignty: it is also a question of human rights. Tamil Nadu fishermen have long relied on the waters surrounding Katchatheevu, but the 1974 and 1976 agreements criminalized their customary practices. The Sri Lankan Navy arrests Indian fishermen who cross the International Maritime Boundary Line (IMBL) regularly with dire humanitarian consequences. Back in 2025, Indian fishermen from Tamil Nadu were the focus of official Sri Lankan malignity within Mutual Legal Assistance and other matters. 237 boats with 80 fishermen were held by Sri Lanka at that time, and over 17 incidents of arrests occurred in only eight months. (Desk, 2024) These arrests not only

deprive individuals of their liberty, but also of their families' main means of livelihood. Fishermen's associations in Rameswaram have stated that the arrests "are destroying our lives." The arrests cause possible grievous humanitarian consequences by inflicting an existential insecurity of re-arrest on the fishermen.

Legally, the situation presents a swampy manner of conception of the International Covenant on Civil and Political Rights (ICCPR), to which Sri Lanka is a party. The arbitrary and inordinate detention violates the right to liberty and livelihood, especially where the offending activity is not violent but survival. As Song and Soliman (2019) note, fishing rights must be seen under the larger umbrella of human rights, essentially an indivisible part of socio-economic identity. Hence, the endless arrests and ongoing detention present violations not only of economic livelihood but also of dignity and cultural belonging for Tamil artisans. This has compelled the Indian government to try to address human rights violations through bilateral diplomacy. The Joint Working Group on Fisheries (JWG), created in 2004, attempted to explicitly identify the use of force employed against fishermen as egregious and captured the humanitarian alarm for treatment and quick release of the detained. (Joint Press Statement after the Conclusion of 4th India-Sri Lanka Joint Working Group (JWG) on Fisheries | High Commission of India, Colombo, Sri Lanka, n.d.) Seemingly half-heartedly, the arrests have not slowed. At the same time, the livelihoods have been depicted in terms of breaches of Article 21 of the Indian Constitution, the right to life and livelihood guaranteed. Tamil Nadu officials demanded the Union perform a quick diplomatic manoeuvre, not well-received due to the strain in the Indian-Sri Lankan relationship. The lack of timeframes on the timeline has demonstrated the irreconcilable gap between the international human rights obligation and state practices in contested maritime zones.

Livelihood, Ecology, and The Principle of Sustainable Development

The dispute also represents a profound crisis of livelihood. For many generations, Tamil fishermen used Katchatheevu and the waters around it as their own traditional grounds of use, and lifeways of sustenance. After the treaties, they have been forced into the position of either exploiting depleted nearshore waters or risking arrest for venturing further into Sri Lanka's waters. (Mukul, 2025) Katchatheevu has diminished their traditional sources of livelihood. There is also an ecological dimension to the crisis as well. As a result of low catches near shore, bottom trawling has become prevalent in Tamil Nadu. Sri Lanka has prohibited bottom trawling, arguing that it destroys much-needed biodiversity in the marine context. (Thangavelu, 2017) However, Indian bottom trawlers continue to engage in this practice, creating tension with Sri Lankan fishermen who are in favor of more sustainable fishing practices. So, there is tension over power and competing ecological paradigms of sustainable fishing, and one's survivable practices diminish the resilience and sustainability of the other. Sustainable development becomes our central principle now. Sustainable development requires parties to consider the ability to preserve resources for future generations with present economic needs and community development needs presently. In the case of the Palk Bay, joint fisheries management plans, equitable resource sharing, and bans on destructive fishing practices are required to address sustainability issues. But even with bilateral pacts, sustainability is not embedded in enforcement and management. Sovereignty, rather than cooperative management, is front and center, in even in the Joint Working Group identified this concern in the need to conserve marine ecology and to leverage cooperation on aquaculture, genetic improvement, and fisheries management (6th Meeting of the Joint Working Group on Fisheries - Press Releases | High Commission of India, Colombo, Sri Lanka, n.d.) (Government of India, 2012) but the ongoing implementation does not live up to these commitments and fishermen are still at risk every day, based on their value to life/livelihood.

The neglect of livelihood and ecology is evident in the ongoing protests and strikes by Tamil Nadu fishermen. In August 2025, there was an indefinite strike called by the Rameswaram All Fishermen's Association for the release of their fellow fishermen and their boats, while Chief Minister Stalin's government called on the Union, to continue to honor traditional rights: (Rameswaram Fishermen Announce Indefinite Strike after Sri Lankan Navy Arrests Eight, 2025c) These protests demonstrate the disconnect between law, and laws legitimacy, and socio-economic realities. The Palk Bay represents a case where struggles for human rights, secure livelihood and ecological sustainability are interdependent. Arrests of fishermen are not isolated incidents of enforcement of law but a lack of justice, where marginalized fishermen's rights are stuck on particular legal, sovereign interpretations and environmental laws. The conflict will remain unresolved and maintain the cycles of insecurity and injustice until the laws take on inclusive, sustainability, and rights-based frameworks.

SECURITY, GEOPOLITICS, AND REGIONAL STABILITY

Strategic Significance of Palk Strait and Chinese Influence

The Palk Strait is the tight corridor whereby most detentions India–Sri Lanka get made, reaching the outcome that local livelihood frictions quickly take on a security hue (Bose/ORF analysis; Moorthy quoted). The record reveals there are detentions largely in this strait, detailing examples around Neduntheevu and Katchatheevu, and the matter resurfaces repeatedly in the context of Tamil Nadu electoral cycles, ramping up centre–state and bilateral tensions. India’s concern is exacerbated by the expansion of China’s presence in Sri Lanka, to include Hambantota Port and (other projects) which provide lasting preemptive strategic leverage through debt and long leases. Analysts contend that these kinds of arrangements keep Colombo under Beijing’s sway for the foreseeable future, and Tamil Nadu politicians sometimes caution that this line of action along Katchatheevu–Palk Strait could surely be a pathway for future Chinese entry if India is passive. (Handunnetti, 2024)

The “Chinese chokehold” discussion has entered Indian members of parliament and policy narratives. Members of parliament have raised potential China-linked renewable energy projects on islands close to Jaffna, driving official action and eventual re-routing of contracts towards an India–Sri Lanka joint venture. Finally, the same narrative includes some defence analysts seeking to add capacity at the INS Parundu facility at Uchipuli, Thanjavur Air Force base in Tamil Nadu for enhancing maritime domain awareness in the Palk Bay. All of this indicates why, in regard to the fishermen disagreement, New Delhi conceives it through a geo-strategic frame rather than a humanitarian one. (Desk, 2024)

This strategic interpose matters, for the routine enforcement actions with trawlers can cascade into larger perceptions of maritime balance in the North Indian Ocean. Ultimately, with arrests in the Palk Strait even as advancement of political leaders and politician governmental systems exchanges barbs, and bilateral atmospherics decline all when neither side desired escalation. The structural vulnerability, therefore, is not just an isolated incident. It is the convergence of livelihood enforcement and great-power tension, which raises the stakes for policy errors on either side. (Handunnetti, 2024)

Cross-Border Smuggling, Security Law, And Maritime Policing

Agencies from both sides constantly underline the smuggling threat in the Palk Bay. Policy proposals suggest a combined maritime security mechanism with digital monitoring measures to secure the corridor from narcotics and contraband flows, including connections to the Golden Crescent and Golden Triangle routes. This cooperation is proposed to enhance stability in the Gulf of Mannar and the Palk Strait while staving off indiscriminate detentions of legitimate fishers. From a legal framework, Sri Lanka’s enforcement relies upon UNCLOS Articles 19 and 21, which allow coastal states the authority to control activities that would impinge on peace, good order or security in the territorial sea, and to create sanctions against any violations of fisheries regulations. Those provisions have been used as justification for arrests and impounding of vessels when Indian vessels are caught beyond the International Maritime Boundary Line.

India has pursued risk reduction efforts on its side of the strait. One significant effort was supplying 5,000 of Tamil Nadu fishers with GPS devices to minimize unintended crossings over the boundary. Implementation barriers remain from uptake and reliability of device use and the fact that IMBL is not visible in the ocean and can be difficult to determine while working in rough seas, offering potential for inadvertent encroachments and repeat detentions. As political timelines persist, so do detentions return and fall in untethered swings. Arrests of dozens of Indian fishers within short periods of time once again make the Palk Strait a point of security emergence, solidifying hardline narratives on both sides, while making it difficult to sustain humanitarian treatment. In March and in other months, groups of detentions in the strait between Neduntheevu and Katchatheevu established national interest, and sharpened electoral claims, further complicating quiet diplomacy.

The policy literature therefore advocates the production of a joint security agreement that separates livelihood enforcement from transnational-crime interdiction. Concepts often mentioned are: 2military cooperation with coordination for patrols or hotlines between the Indian Coast Guard and Sri Lankan Navy to create standard operating procedures for boarding, search, and release processes for non-criminal fishermen while

implementing enforcement measures against contraband operations. Targeted technology, such as interoperable vessel monitoring and warnings and geofence alerts at IMBL corridors, so authorities can distinguish artisanal crafts from potential threat movements. De-escalation ladders that prioritize warning and escorted turn-around and quick release for lower incidents for the first-time violation and reserve prosecution for repeat or organized criminal infractions. (FOUNDATION, n.d.)

Without these calibrated practices, the Palk Bay would backslide into securitized patterns that conflate artisanal livelihoods and criminality, thereby further inflaming grievances in Tamil Nadu and political pressures in Colombo. Thus, mutually reinforcing offsetting positions. Every arrest perpetuates distrust, which limits the effectiveness of coordination patrols or information-exchanging, which then renders each violator enforcement more onerous and expensive. Both capitals need to repudiate the chemically reliant cycle. Reconstructing this cycle requires both capitals to reconsider their experiences in the Palk Bay. Rather than viewing the problem as a dilemma enough to warrant border negotiations, these two capital authorities will benefit from viewing the Palk Bay as a shared security-and-livelihood commons, and that the only solution that is both viable and sustainable is precision-fed policing in lieu of crises. (Desk, 2024)

RECONCILING UNCLOS WITH BILATERAL OBLIGATIONS

Doctrinal Approaches: Harmonisation Versus Conflict Resolution

The most enduring obstacle in the India–Sri Lanka maritime dispute is the ability to reconcile UNCLOS obligations with bilateral treaties and customary practice. Articles 19, 21, and 56 of UNCLOS ensure that coastal states have extensive authority to regulate foreign vessels in their territorial sea and exclusive economic zones. Sri Lanka cites provisions of UNCLOS to argue that, based on Articles 19, 21, and 56, Indian trawlers traversing the International Maritime Boundary Line (IMBL) constitute a violation of Sri Lanka’s “peace, good order, or security,” thereby justifying vessel and crew seizures. (Jose, 2024b) Two bilateral treaties signed in 1974 and 1976 between India and Sri Lanka recognized the traditional access of Indian fishermen to Katchatheevu waters, but they permitted only limited entry for resting, drying nets, or attending pilgrimages. The Indian Supreme Court has concluded that Sri Lanka authorized or recognized Kerala fishermen based on sovereignty lines. While the later intent of Sri Lanka was about sovereignty, Indian policymakers and Tamil Nadu politicians position the treaties around historic rights. This doctrinal divergence illustrates the difference between a strict positivist interpretation of UNCLOS and a harmonization viewpoint that incorporates bilateral obligations and customary practice within the UNCLOS framework.

Reconciling UNCLOS with the bilateral treaties would imply an interpretation of UNCLOS that is flexible enough to ensure the traditional fishing rights are not extinguished. For instance, the concept of equity in the context of maritime delimitation, and historic waters provided under Article 15 of UNCLOS would inform arguments that livelihood endeavour may be afforded consideration. But conflict resolution will require additional steps of formal renegotiation or dispute settlement, potentially in the ICJ or arbitral tribunals. However, it is well documented that Sri Lanka has uniformly rejected attempts to renegotiate the 1976/76 treaties, and India has maintained in its Supreme Court proceedings that the issue is a settled boundary matter. (Manoharan & Deshpande, 2018)

Thus, doctrinally, India and Sri Lanka remain wedged between two competing arguments. Harmonization presents a method to protect the rights of fishermen while preserving sovereignty claims, while conflict resolution would necessitate the states engaging in political will to resolve the matter. Neither state has favoured the political will to resolve the issue historically. The impasse illustrates that legal interpretation cannot alone resolve the dispute when there is no means to politically accommodate each other, or to build trust in either process.

Towards A Model Framework For Cooperative Fisheries Governance

Given these doctrinal limitations, scholars and policy analysts have begun to call for a new model of cooperative governance that integrates sovereignty and sustainability. The India–Sri Lanka Joint Working Group on Fisheries (JWG) that was established in 2004 and reconstituted in 2016 was a significant step in this direction. Its objectives included the phase-out of bottom trawling, developing Standard Operating Procedures (SOPs)

related to humane treatment and release of apprehended fishermen, and enhancing naval collaboration on patrolling. (Sabha, n.d.)

Yet the JWG has received backlash both for the infrequent nature of its meetings, which were held only five times in thirteen years, and for the failure of delegations to establish a solid enforcement arrangement. Therefore, fishermen still get apprehended without commitment to joint efforts on the ground, even after a mutual agreement to not escalate use of force or to use humanitarian considerations is in order. (Sabha, n.d.) This is a clear case that calls for a more inclusive and participatory arrangement.

Several innovations could make such a framework effective:

- **Leasing Fishing Blocks:** Proposals have been discussed for India to lease the surplus catch areas from Sri Lanka, with revenues generated from royalty to be incorporated with the Sri Lankan fisherfolk. This would create a revenue source for Sri Lanka and provide legal access for Indian fishermen. (Manoharan & Deshpande, 2018)
- **Ban on Mechanised Trawlers:** Both nations have expressed agreement regarding the destruction bottom trawling brings to marine biodiversity. A practical phase-out of mechanized trawlers and alternative sources of livelihoods via subsidies would considerably ease tensions and maintain resources. (Van Der Kooij et al., 2016)
- **Joint Aquaculture and Research:** Joint initiatives, such as the Integrated Mangrove Fishery Farming Systems (IMFFS) in Tamil Nadu, could present ecosystem-based fisheries alternative solutions to overfishing and serve as replicable sustainable livelihoods. (Farmed Fishing, 2016)
- **Humanitarian Protocols:** Appropriate “no arrests for five nautical miles” on inadvertent encroachment and enhanced rapid retaliation through High Commissions would allow for reduction in loss of freedom for artisan fishers. This proposal precedes the JWG and allows for reduction of criminalization of artisanal fishers. (Farmed Fishing, 2016)
- **Community Participation:** Of significance is Tamil Nadu, which has disengagement from precedent treaty negotiations sown, limited relations, and discontent. A modicum base for modeling would require multi-tier governance including state governments, fishermen’s associations, and ecological specialists to provide engagement at the table. (Jose, 2024b)

The basic tenet of this model is an evolution from a not-equal to shared stewardship model. This issue cannot be dealt with legally, much less account for human rights, ecology, and socio-economic justice; apply this arrangement to operational governance extents. Cooperative fisheries governance then is a middle ground where UNCLOS sovereignty norms and bilateral agreement obligations allowable combined operationally.

CONCLUSION

The maritime boundary dispute between India and Sri Lanka reveals how rigidities of international law on boundaries intersect with a local reality of coastal communities. The 1974 and 1976 agreements were legally a boundary demarcation, but created a permanent constitutional anomaly for Indians and disrupted Tamil Nadu’s longstanding fishing norms. It was a unilateral act of the Union Government that stripped the states of their voice and exacerbated a federal system of government, leaving their fishermen exposed to ongoing arrests and detentions. ; From a UNCLOS stance, Articles 19, 21, and 56 allow coastal states like Sri Lanka to regulate and protect their ocean resources. However, a visible absence of express recognition of traditional rights, under the Convention, still exists, resulting in a regulatory black hole where sovereign enforcement is in direct height of historical use. The promise of customary international law, which recognizes established and consistent practices, represents the possible future relief from the impasse, but the bilateral treaties expressly limited that right, creating a doctrinal conflict between treaty and customary obligations, which does nothing to mitigate the existing legal rule with respect to customary law. (Song & Soliman, 2019)

However, the disputes cannot purely be diluted down to a technical legal issue. Each intervention through the arrests as well as detainees presents a human rights law obligation issue engaging liberty, dignity, and livelihood rights. The environment, especially the ban on bottom trawling and the future need for sustainable marine, highlights the cross-border interaction of international environmental law and socio-economic justice. To

not include, at a prospective minimum, reconnect justice, may inadvertently forget the human cost of justice related to fishing communities.(Thangavelu, 2017)

Geopolitically, Palk Bay has grown into wider regional security issues. Sri Lankan maritime enforcement is about understanding, not only about ocean resource protection, but also smuggling, and outside strategic matters, like China in Indian Ocean. Even more, the dispute lies at the interface of traditional not federalism and crossing international diplomacy, and at the intervention of strategic rivalries.(Dupuy & Dupuy, 2013)

The way forward comes from the reconciliation framework expanding rigid sovereignty. The doctrinal harmonisation between UNCLOS and bilateral may be obtained by contextualizing sovereignty with equity and livelihood rights. Politically, a cooperative fisheries governance model that includes seasonal access, joint monitoring, and multi-level state participation, particularly involving Tamil Nadu, needs to be established. The humanitarian type basis, like fast-tracking people, should supplement enforcement.

Thus, the dispute is also a test case for international law, mimicking a mix of hard boundaries and soft entitlements, and Indian constitution law in reconciling Union treaty-making powers, with state livelihood rights. Not the mapping of boundaries, but re-conception of legal regime parameters are challenged.(Dai et al., 2022) The only way for India and Sri Lanka to treat the Palk Bay beyond the disaster of a contested zone, is still co-operations to work as independent shared space of potential justice.

REFERENCES

1. 6th meeting of the Joint Working Group on Fisheries—Press Releases | High Commission of India, Colombo, Sri Lanka. (n.d.). Retrieved October 22, 2025, from <https://www.hcicolombo.gov.in/section/press-releases/6th-meeting-of-the-joint-working-group-on-fisheries/>
2. 50 years of Emergency: EAM Jaishankar blames 1974 deal for fishermen arrests by Sri Lanka; says consequences still visible in Tamil Nadu. (2025, June 27). The Times of India. <https://timesofindia.indiatimes.com/india/50-years-of-emergency-eam-jaishankar-blames-1974-deal-for-fishermen-arrests-by-sri-lanka-says-consequences-still-visible-in-tamil-nadu/articleshow/122115727.cms>
3. Acharya, N. (n.d.). 'Treat us like humans': Fishing wars trap Indians in Sri Lankan waters. Al Jazeera. Retrieved October 16, 2025, from <https://www.aljazeera.com/features/2025/1/1/treat-us-like-humans-fishing-wars-trap-indians-in-sri-lankan-waters>
4. Adams, M. (2015). Indo – Lanka Fishery Issues: Traditional and Human Security Implications. <https://ir.kdu.ac.lk/handle/345/1232>
5. Amaralal, K., Abeykoon, N., & Deepananda, K. A. (2021). Indo-Sri Lanka fishing conflict in the Palk Bay and its implications for fisheries.
6. Bureau, T. H. (2025, August 4). India's marine fish landings drop 2% in 2024: CMFRI. The Hindu. <https://www.thehindu.com/news/national/kerala/indias-marine-fish-landings-drop-2-in-2024-cmfri/article69894757.ece>
7. Dai, M., Su, J., Zhao, Y., Hofmann, E. E., Cao, Z., Cai, W.-J., Gan, J., Lacroix, F., Laruelle, G. G., Meng, F., Müller, J. D., Regnier, P. A. G., Wang, G., & Wang, Z. (2022). Carbon Fluxes in the Coastal Ocean: Synthesis, Boundary Processes, and Future Trends. *Annual Review of Earth and Planetary Sciences*, 50(Volume 50, 2022), 593–626. <https://doi.org/10.1146/annurev-earth-032320-090746>
8. Desk, I. T. N. (2024, April 2). Politics aside, why Katchatheevu matters. India Today. <https://www.indiatoday.in/india/story/katchatheevu-island-tamil-nadu-fishermen-sri-lanka-indira-gandhi-palk-strait-fishing-s-jaishankar-dmk-2521854-2024-04-02>
9. Dodangodage, P. K. (2017). Illegal fishing by Indian trawlers violating the maritime boundary of Sri Lanka and its impact on livelihood and the Indo-Sri Lanka relations. <http://192.248.104.6/handle/345/1685>
10. Dupuy, F., & Dupuy, P.-M. (2013). A legal analysis of China's historic rights claim in the South China Sea. *American Journal of International Law*, 107(1), 124–141.
11. Farmed fishing: A nature based solution to increased resilience | IUCN. (2016, October 1). <https://iucn.org/news/india/201610/farmed-fishing-nature-based-solution-increased-resilience>

12. FOUNDATION, O. R. (n.d.). India-Sri Lanka ties: Fishermen, maritime security, and bilateral talks. Orfonline.Org. Retrieved October 24, 2025, from <https://www.orfonline.org/expert-speak/india-sri-lanka-ties-fishermen-maritime-security-and-bilateral-talks>
13. Get Back Katchatheevu, Save Our Fishermen: MK Stalin Writes To PM Modi. (n.d.). Retrieved October 16, 2025, from <https://www.ndtv.com/india-news/get-back-katchatheevu-save-our-fishermen-mk-stalin-writes-to-pm-modi-8079881>
14. Handunnetti, D. (2024, May 5). Katchatheevu, a view from Sri Lanka. The New Indian Express. <https://www.newindianexpress.com/opinions/2024/May/05/katchatheevu-in-headlines-again-after-5-decades>
15. Joint Press Statement after the conclusion of 4th India-Sri Lanka Joint Working Group (JWG) on Fisheries | High Commission of India, Colombo, Sri Lanka. (n.d.). Retrieved October 22, 2025, from <https://www.hcicolombo.gov.in/page/joint-press-statement-after-the-conclusion-of-4th-india-sri-lanka-joint-working-group-jwg-on-fisheries/>
16. Jose, D. (2024a, March 28). Resolving the India-Sri Lanka fishing dispute. Hindustan Times. <https://www.hindustantimes.com/ht-insight/international-affairs/resolving-the-india-sri-lanka-fishing-dispute-101711623549034.html>
17. Joseph, L. (2003). National report of sri lanka. Unpublished Report Prepared for the BOBLME Programme. Unedited Version at Wwww. BOBLME. Org.
18. Katchatheevu Island Dispute: Geography & Strategic Importance. (n.d.). Retrieved October 22, 2025, from <https://padhai.ai/blogs-padhai/katchatheevu-island-upsc>
19. Katchatheevu: Why an Indian Island went to Sri Lanka and many hope for its symbolic return. (2024, April 4). The Indian Express. <https://indianexpress.com/article/research/katchatheevu-why-an-indian-island-went-to-sri-lanka-and-many-hope-for-its-symbolic-return-8942104/>
20. Kwiatkowska, B., Dotinga, H., Molenaar, E. J., Oude Elferink, A. G., & Soons, A. H. (2021). International Organizations and the Law of the Sea 1998: Documentary Yearbook (Vol. 14). BRILL. [https://books.google.com/books?hl=en&lr=&id=x9A7EAAAQBAJ&oi=fnd&pg=PR3&dq=7.%09Division+for+Ocean+Affairs+and+the+Law+of+the+Sea,+Office+of+Legal+Affairs+\(DOALOS/OLA\).+\(2002\).+Agreement+between+Sri+Lanka+and+India+on+the+boundary+in+historic+waters+between+the+two+countrie+s+and+related+matters.+United+Nations+Treaty+Series.&ots=n1uHmwVDHb&sig=8TINYXFq-6wLVes2s7LVYgMMacA](https://books.google.com/books?hl=en&lr=&id=x9A7EAAAQBAJ&oi=fnd&pg=PR3&dq=7.%09Division+for+Ocean+Affairs+and+the+Law+of+the+Sea,+Office+of+Legal+Affairs+(DOALOS/OLA).+(2002).+Agreement+between+Sri+Lanka+and+India+on+the+boundary+in+historic+waters+between+the+two+countrie+s+and+related+matters.+United+Nations+Treaty+Series.&ots=n1uHmwVDHb&sig=8TINYXFq-6wLVes2s7LVYgMMacA)
21. Manoharan, N., & Deshpande, M. (2018). Fishing in the Troubled Waters: Fishermen Issue in India–Sri Lanka Relations. *India Quarterly: A Journal of International Affairs*, 74(1), 73–91. <https://doi.org/10.1177/0974928417749643>
22. Mukul, S. (2025, March 3). Why a 50-year-old pact with Sri Lanka is being blamed for arrests of Indians. India Today. <https://www.indiatoday.in/india/story/india-sri-lanka-maritime-agreement-1974-1976-katchatheevu-island-fishermen-arrest-protest-tamil-nadu-rn-ravi-2688228-2025-03-03>
23. QUESTION NO. 632 FISHERMEN HARASSED BY SRI LANKAN PERSONNEL. (n.d.). Ministry of External Affairs, Government of India. Retrieved October 17, 2025, from https://mea.gov.in/lok-sabha.htm?dtl/35982/QUESTION_NO_632_FISHERMEN_HARASSED_BY_SRI_LANKAN_PERSONNEL
24. Rameswaram fishermen announce indefinite strike after Sri Lankan Navy arrests eight. (2025a, August 10). @mathrubhumi. <https://english.mathrubhumi.com/news/india/rameswaram-fishermen-announce-indefinite-strike-after-sri-lankan-navy-arrests-eight-vfw2ytce>
25. Sabha, L. (n.d.). GOVERNMENT OF INDIA MINISTRY OF EXTERNAL AFFAIRS.
26. Saha, S. T. (2024, March 21). Decoding India-Sri Lanka fishermen issue: A visual guide. India Today. <https://www.indiatoday.in/india/story/india-sri-lanka-fishing-problem-and-maritime-dispute-2517886-2024-03-21>
27. Sarvananthan, M. (2018). Envisioning a smart resolution to fishing disputes between India and Sri Lanka. *Maritime Affairs: Journal of the National Maritime Foundation of India*, 14(2), 92–105. <https://doi.org/10.1080/09733159.2018.1564556>
28. Sivaramanan, S. (2023a). Potential solutions to environmental conflict on exploitation of fish stocks in palk strait among fishermen of India and Sri Lanka. *Sri Lanka Journal of Aquatic Sciences*, 28(1). <https://account.sljas.sljol.info/index.php/sljo-j-sljias/article/view/7606>

29. Song, A. M., & Soliman, A. (2019). Situating human rights in the context of fishing rights—contributions and contradictions. *Marine Policy*, 103, 19–26.
30. Thangavelu, D. (2017, July 8). Sri Lanka bans bottom trawling, Tamil Nadu raises concern. Mint. <https://www.livemint.com/Politics/JjYfYBvq3SEfBZQe4hc2SO/Sri-Lanka-bans-bottom-trawling-Tamil-Nadu-raises-concern.html>
31. Van Der Kooij, J., Fässler, S. M., Stephens, D., Readdy, L., Scott, B. E., & Roel, B. A. (2016). Opportunistically recorded acoustic data support Northeast Atlantic mackerel expansion theory. *ICES Journal of Marine Science*, 73(4), 1115–1126.
32. Vincent, S. (2020). Palk Bay fishing problem requires Indo-Sri Lankan joint-governance. *Maritime Affairs: Journal of the National Maritime Foundation of India*, 16(2), 71–88. <https://doi.org/10.1080/09733159.2020.1838717>
33. Wang, W., & Xue, G. (2023a). Revisiting Traditional Fishing Rights: Sustainable Fishing in the Historic and Legal Context. *Sustainability*, 15(16), 12448.