

Fish Fund Project Grant Application Form – Category I

1. Title of the grant application:

Assessment of needs to facilitate Timor-Leste's implementation of the WTO Agreement on Fisheries Subsidies (AFS).

2. WTO Member or Members submitting this application:

Timor-Leste, which accepted the AFS on 30 August 2024.

3. Government agency or organization responsible for the implementation of this grant and its reporting to the Fish Fund:

Directorate General of Fisheries, Aquaculture and Aquatic Resources Management (DG-PAGRA) under the Ministry of Agriculture, Livestock Fisheries and Forestry.

4. How the project aligns with the Fish Fund Theory of Change (Category I)?

This application is fully aligned with the [Fish Fund's Theory of Change for Category I grants](#).

☒ The main objective of this grant application is to produce a **needs assessment** to support the implementation of the AFS in Timor-Leste and to **contribute to the preparation of a proposal for category II** funding support.

Component	Explanation
Inputs	Funding through Fish Fund category I grant
Activities	1. Conduct an assessment of Timor-Leste's needs to align its policy and legal frameworks with the AFS disciplines. 2. Prepare a needs assessment report outlining the gaps and possible mitigation actions. 3. Prepare a project proposal for category II funding support.
Outputs	1. Gaps in the policy and legal frameworks to implement the AFS disciplines identified in Timor-Leste. 2. Needs assessment report prepared outlining the implementation gaps and identifying the mitigation actions. 3. Project proposal for category II funding support submitted.
Intermediate outcomes	Improved understanding among the Ministry of Agriculture, Livestock Fisheries /DG-PAGRA and relevant stakeholders of implementation gaps and options to address them by applying for additional funding.
Outcomes	Timor-Leste is better positioned to secure category II funding and supported to address the identified gaps in implementing the disciplines of the AFS in its policy and legal frameworks
Impact	Assist in the process of implementing the AFS in Timor-Leste.
Long term impact	Contribute to the overall objective of the Fish Fund and the AFS to improve the sustainability of marine resources through the prevention, deterrence, and elimination of Illegal, Unreported and Unregulated (IUU) fishing, as well as the reduction of fishing on overfished stocks.

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5. **Indicate the total amount requested from the Fish Fund in United States Dollars (USD). Upload an indicative budget in Excel format, including estimated costs for experts, consultations, and outreach activities). The budget should also include any additional financial or in-kind contributions from the government and other agencies. The budget template can be downloaded via the link below:**

The total amount requested is USD 49,885 (forty-nine thousand eight-hundred eighty US dollars and five cents). The other expenses will be covered by DG-PAGRA office.

Please see attached excel and kindly note that the airfare cost was set above USD 2 000 in order to allow flexibility in global consultant recruitment considering that Dili has limited routing options.

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6. **Briefly describe the national context and challenges for implementing the Agreement on Fisheries Subsidies in your country/territory or region.**

Since independence, in 2002, Timor-Leste has made remarkable progress in peacebuilding, governance and human development. However, as both a Small Island Developing State (SIDS) and a Least Developed Country (LDC), it remains highly vulnerable to economic, environmental and climatic shocks. Agriculture – crop and livestock production, forestry, **fisheries** and aquaculture – is a key economic sector, providing livelihoods for 70 percent of the population and contributing 16.7 percent to GDP in 2023. 80 percent of rural households practice crop and livestock production or artisanal fisheries; 97 percent of those are smallholder subsistence producers.¹

In spite of the importance of fisheries, **the country has not yet adopted a national strategy for the sector. The adoption of such strategic instrument would contribute to guide the implementation of the AFS in the country** namely by providing policy requirements on:

- The elimination of subsidies linked to **illegal fishing**;
- Avoiding subsidies for **overfished stocks**;
- Preventing subsidized fishing in **unregulated high seas**;
- Enhancing **transparency and reporting**; and
- Prioritizing support to **small-scale fishers**.

The legal framework is composed of the following key instruments:

- The **General bases of the Legal Regime for the Management and Planning of Fisheries and Aquaculture** approved by [Law Decree 6/2004 of 21 Abril](#), as amended by [Law Decree 4/2005 from 20 July](#) (hereinafter **Fisheries Law**), which applies to fishing in national maritime waters, in the high seas and in the hydrographical basins of the country. It comprises very detailed 131 articles and grants the Minister with the power to promote the adoption of regulatory provisions on high seas fishing, namely those regarding the implementation of international Conservation and Management Measures and Monitoring, Control and Surveillance (MCS) of fishing operations, position of fishing vessels, catches of target species and incidental by-catches, identification marks of fishing vessels and fishing gear, permit application and registration of the fishing vessels (Art. 63)- these have been implemented by the General Fisheries Regulation.
- The **General Fisheries Regulation**, approved by [Government Decree 5/2004 of 21 July](#) as amended by Government Decree 3/2005 of 5 July, establishes a very detailed set of rules (204 articles and 8 annexes) which complement the Fisheries Law.

This legal framework was adopted 22 years ago before Timor-Leste had become a party to the following multilateral legally binding instruments (in chronological order):

¹ According to FAO- [Timor-Leste at a glance](#)

- The 1982 *United Nations Convention on the Law of the Sea* (UNCLOS)² which the country ratified through Parliament Resolution 18/2012 from 27 December;
- The 2009 *FAO Agreement on Port State Measures to Prevent, Deter and Eliminate IUU Fishing* (PSMA)³ which the country acceded through Government Resolution 8/2023 from 15 March;
- The 2022 *WTO Agreement on Fisheries Subsidies* (AFS)⁴ which was accepted by Timor-Leste through Parliament Resolution 22/2024 from 17 July.

In 2018 -2019 the Government of Timor-Leste benefited from support of the [WorldFish](#) to assist in drafting the National Fisheries Strategy and to review and update the Fisheries Law and the General Fisheries Regulation (see section 8 below). However, both the draft Strategy and the revised fisheries legislation do not include the commitments derived from the PSMA and the AFS since the country only became a party to them in 2023 and 2025 respectively.

In particular with regard to the AFS the amendment of the legal framework would *inter alia*:

- Enable the establishment of strict subsidy eligibility rules;
- Strengthen the MCS system rules;
- Align the national requirements with the WTO enforcement mechanisms.

There are also several **non-legally binding instruments** that have been adopted since the entry into force of the Fisheries Law and General Fisheries Regulation of Timor-Leste that should be incorporated to ensure full alignment of Timor-Leste with its obligations as a flag, coastal and port State as well as with the internationally agreed market-related measures, including (in chronological order):

- [The 2008 International Guidelines for the Management of Deep-sea Fisheries in the High Seas](#);
- [The 2014 Voluntary Guidelines for Securing Sustainable Small-Scale Fisheries in the context of Food Security and Poverty Eradication](#);
- [The 2017 Voluntary Guidelines for Catch Documentation Schemes](#);
- [The 2019 Voluntary Guidelines on the Marking of Fishing Gear](#);
- [The 2022 Voluntary Guidelines for Transshipment](#).

In spite of not being legally binding, these voluntary guidelines should be incorporated in National Fisheries Strategy and in the legislation of Timor-Leste since they reflect internationally recognized best practices, promote policy coherence and strengthen accountability mechanisms which will assist Timor-Leste to align its policy and legal frameworks with global standards.

It should be noted that the AFS sets binding legal prohibitions (e.g., no subsidies for IUU fishing or overfished stocks) but does not provide details on how to implement the prohibitions. The above-mentioned voluntary guidelines provide practical and technical tools that facilitate the operationalisation of the AFS in national policy and legal frameworks.

7. Does this grant application support activities that have been directly linked to an approved national strategy or plan? If yes, please name the document and indicate whether there is an explicit reference to the implementation of the Agreement on Fisheries Subsidies.

☒ Yes.

☐ No.

² http://www.un.org/depts/los/convention_agreements/texts/unclos/unclos_e.pdf

The UNCLOS is in force since 16/11/1994, **Timor-Leste is a Party since 8/01/2013.**

³ <http://www.fao.org/3/a-i5469t.pdf>

The PSMA is in force since 05/06/2016, **Timor-Leste is a Party since 29/03/2023.**

⁴ <https://docs.wto.org/dol2fe/Pages/SS/directdoc.aspx?filename=q:/WT/MIN22/33.pdf&Open=True>

The SFS is in force since 15/09/2025, **Timor-Leste is a Party since 30/08/2025.**

☐ Maybe.

This grant will support the implementation of the **National Strategy and Action Plan** (NSAP) for the Implementation of the PSMA and complementary international instruments and regional mechanisms developed with the support of FAO in 2024-2025 (see section 8). Under the section of the NSAP on engagement of Timor-Leste in Global and Regional processes explicit reference is made to the AFS⁵.

This grant will also support the identification of actions for the review of the policy and legal frameworks of Timor-Leste which have been identified as a priority under the NSAP, including the review and update of the National Plan of Action to prevent, deter and eliminate IUU fishing (NPOA-IUU)⁶.

8. Indicate whether your government is or has been a beneficiary of support from Fish Fund core partners or other specialized agencies with the objective of supporting the implementation of the Agreement on Fisheries Subsidies and/or issues relating to IUU fishing. If yes, please provide a description of the support measure and its implementing partner, with a brief explanation on how this grant application will avoid duplicating activities and/or resources.

☒ Yes.

☐ No.

The Government of Timor-Leste⁷ has benefited from support of the [WorldFish](#) between 2018 and 2019 to draft the **National Fisheries Strategy** and to review and update the **Fisheries Law and the General Fisheries Regulation**. This support covered several issues including those aimed at preventing, deterring and eliminating IUU fishing. **This grant will** allow to identify the gaps that need to be addressed to complete the review process with the inclusion the AFS disciplines in the policy and legal frameworks of Timor-Leste.

More recently, in 2024, FAO has provided technical assistance to the Ministry of Agriculture, Livestock Fisheries and Forestry and DG-PAGRA⁸ in the organisation of a [multi-stakeholders needs assessment workshop that took place in Dili from 23 to 27 September 2024](#) and drafting of the NSAP mentioned in the previous section. The NSAP submitted in February 2025 was formally endorsed by the Government of Timor-Leste on 13 March 2026⁹.

When the multi-stakeholders' needs assessment workshop was undertaken in Dili, the AFS had not yet entered into force, and therefore the implementation of the AFS in Timor-Leste was not assessed in detail. **This grant will allow to expand the assessment with a specific focus on the integration of the AFS disciplines in the policy and legal frameworks of Timor-Leste.**

⁵ See page 10 of the NSAP.

⁶ Timor-Leste has elaborated a NPOA-IUU in 2013 which is outdated and has not been implemented. Pursuant to the International Plan of Action (IPOA) to prevent, deter and eliminate IUU fishing "at least every four years after the adoption of their NPOAs, States should review the implementation of these plans for the purpose of identifying cost-effective strategies to increase their effectiveness and to take into account their reporting obligations to FAO under Part VI of the IPOA."

⁷ At that time through the Ministry of Agriculture and Fisheries, General Directorate of Fisheries.

⁸ This Technical Assistance was undertaken under TCP/INT/3904 project to catalyse the implementation of the PSMA among the member states of the Community of Portuguese-Speaking Countries (CPLP) - Angola, Brazil, Cabo Verde, Equatorial-Guinea, Guinea-Bissau, Mozambique, São Tome and Príncipe and Timor-Leste. Portugal is a member of CPLP but is not a recipient country of the project.

⁹ This Technical Assistance was undertaken under TCP/INT/3904 project to catalyse the implementation of the PSMA among the member states of the Community of Portuguese-Speaking Countries (CPLP) - Angola, Brazil, Cabo Verde, Equatorial-Guinea, Guinea-Bissau, Mozambique, São Tome and Príncipe and Timor-Leste. Portugal is a member of CPLP but is not a recipient country of the project.

9. Indicate if this grant application will benefit from implementation support from any of the Fish Fund partners. If support will be provided by other international organizations, please specify under 'Other'.

- ☒ Yes.
- ☒ FAO
 - ☐ IFAD
 - ☐ World Bank
 - ☐ WTO
- ☐ No.
- ☐ Other:
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10. Provide additional information on other government departments that are expected to play a role in the implementation and or collaboration of this grant.

The other government institutions that are expected to play a role in the needs assessment include:

- Ministry of Foreign Affairs and Cooperation;
 - National Maritime Authority;
 - Timor-Leste Ports Administration, I.P. (APORTIL);
 - National Directorate of Maritime Transports;
 - Customs Authority;
 - Maritime Unit of the National Police of East Timor (UM-PNTL);
 - Migration Service;
 - Scientific and Criminal Investigation Police (PCIC); and
 - Public prosecutors.
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11. Indicate the expected duration for implementation and completion of the grant:

- ☐ 1-3 months.
- ☒ 3-6 months.
- ☐ Other (please specify).

12. Provide a brief description of the communication strategy that will be used to disseminate information about the grant and its intended audience.

The DG-PAGRA will be responsible for preparing and implementing the communication strategy aiming at disseminating information and acknowledging the support of the Fish Fund in improving the sustainability of marine resources in Timor-Leste.

This strategy will include:

- Acknowledgment of the Fish Fund support in all project materials, publications and reports;
 - Branding and visibility in the needs assessment workshop through printed materials and digital logo;
 - Media coverage of the workshop and preparation of media briefing and press release.
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13. Indicate communication channels that will be used to share information about the project and from the Fish Fund?

- ☒ Government website or social media

- ☒ Local media (TV, news, etc)
 - ☒ Through partner organizations websites and social media
 - ☐ Other
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14. Upload a letter of endorsement from the government entity responsible for implementation.

Please see attached endorsement letter from 13 of March 2026, signed by the Director-General, of DG-PAGRA Mr. Akasio dos Santos.

15. Any additional comment or observation relevant to consideration of the application.

16. Contact point for this application

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17. Date of Submission

Dili, 06, May 2026.