Journal of International Commercial Law and Technology
Print ISSN: 1901-8401

Website: https://www.jiclt.com/

Research Article

From Somalia to The Gulf of Guinea: Policy Transfer, Sovereignty and Institutional Translation in Anti-Piracy Governance

Article History

Received: 02-07-2026
Revised: 26-08-2026
Accepted: 04 -10-2026
Published: 05-11-2026

Doi: 10.61336/Jiclt/20267202

Name of Authors:
Oghenekevwe Orighoyegha[1*]

Affiliation:
[1]Doctoral College – Faculty of Business and Law, Bournemouth University, Bournemouth, United Kingdom

Corresponding Author
Oghenekevwe Orighoyegha
oorighoyegha@bournemouth.ac.uk

How to cite this article:
Orighoyegha, Oghenekevwe From Somalia to The Gulf of Guinea: Policy Transfer, Sovereignty and Institutional Translation in Anti-Piracy Governance. J. Int. Commer Law Technol., 2026;7(2):9–17,

©2026 the Author(s). This is an open access article distributed under the terms of the Creative Commons Attribution License (http://creativecommons.org/licenses/by/4.0)

Abstract: The suppression of Somali piracy generated an influential model of maritime security governance built around multinational naval operations, information sharing, legal cooperation and public-private security arrangements. Yet its apparent success obscures a more difficult question: whether governance practices developed in response to piracy can travel across regions with different configurations of sovereignty, state capacity and maritime criminality. This article examines that question through a comparative analysis of Somalia and the Gulf of Guinea. Combining Policy Transfer Theory with Global Governance Theory, it argues that the evolution of African anti-piracy governance reflects selective policy transfer rather than institutional replication. Practices concerning maritime domain awareness, information sharing, legal cooperation and regional coordination proved comparatively transferable, whereas extensive foreign naval intervention, external leadership and private armed security encountered stronger political and institutional constraints. The Gulf of Guinea consequently did not reproduce the Somali architecture but translated selected practices into a sovereignty-conscious regional framework centred on the Yaoundé Architecture and regional institutions. The article demonstrates that policy transfer in maritime security is conditioned by the authority structures into which policies travel. The article therefore advances the concept of institutional translation, arguing that the effectiveness of anti-piracy governance depends not on replicating successful models but on adapting governance innovations to local configurations of sovereignty, authority and institutional capacity.

Keywords: Piracy, Maritime Security, Policy Transfer, Global Governance, Somalia and Gulf of Guinea, Sovereignty, Yaoundé Architecture

INTRODUCTION

Piracy occupies a paradoxical position in international law. The United Nations Convention on the Law of the Sea ('UNCLOS') defines piracy primarily by reference to conduct occurring on the high seas or in a place outside the jurisdiction of any state and requires states to cooperate 'to the fullest possible extent' in its repression [1]. It also authorises states to seize pirate ships on the high seas and empowers the courts of the seizing state to determine penalties. Yet this unusually internationalised enforcement regime does not itself provide the surveillance capabilities, naval assets, prosecutorial institutions or political cooperation necessary for effective suppression. Contemporary piracy therefore exposes a tension between the internationalisation of enforcement authority and the continuing dependence of maritime security upon states and other governance institutions. The international response to Somali piracy brought this tension sharply into focus. From 2008, the United Nations Security Council adopted exceptional measures addressing piracy off Somalia. Resolution 1816 authorised cooperating states, with the consent of Somalia's Transitional Federal Government, to enter Somali territorial waters and take measures to repress piracy and armed robbery at sea [2]. Subsequent resolutions strengthened international participation and coordination, including through naval deployments and the establishment of an international cooperation mechanism. The resulting response nature of the arrangement is critical. Resolution 1816 expressly stipulated that its authorisation applied only to Somalia and was not intended to establish customary international law. Success in Somalia therefore does not necessarily establish the portability of its governance architecture to other regions. This distinction between effectiveness and transferability provides the starting point for the present analysis. Treating Somalia as an exportable anti-piracy 'model' risk assuming that practices effective within one governance environment can simply be reproduced elsewhere. Governance arrangements operate within distributions of political authority, legal competence, institutional capacity and legitimacy. Policy-transfer scholarship similarly

demonstrates that the movement of policy knowledge does not necessarily entail straightforward institutional copying [3]. The more significant question is therefor howanti-piracy practices travel between different political and legal environments, which elements are adopted or rejected, and how receiving institutions reconstruct them.

This question became particularly important as the Gulf of Guinea emerged as another significant focus of piracy, armed robbery at sea and wider maritime criminality. The governance context, however, differed markedly from Somalia. West and Central African states retained stronger claims to sovereign control of their maritime domains, while established regional organisations provided institutional foundations for cooperation. The 2013 Yaoundé Code of Conduct consequently constructed a regionally anchored framework involving states and institutions including ECOWAS, ECCAS and the Gulf of Guinea Commission [4]. Its scope extends beyond piracy and armed robbery to other illicit maritime activities and promotes national legal development, information sharing and operational coordination. The architecture thus privileges regional ownership while accommodating external assistance.

The contrast presents an important gap in existing analysis. Somalia and the Gulf of Guinea are frequently examined as distinct maritime-security problems, thereby obscuring the movement and adaptation of governance practices between them. Similar institutional features do not establish replication, while institutional differences do not demonstrate the absence of policy learning. What requires explanation is the process through which governance practices travel and the political, legal and institutional conditions determining their eventual form.

This article addresses that problem by combining Policy Transfer Theory and Global Governance Theory. Dolowitz and Marsh conceptualise policy transfer as a process in which knowledge concerning policies, administrative arrangements, institutions and ideas in one political setting informs their development in another. Importantly, transfer encompasses different forms rather than simple copying, making the framework particularly useful for examining how maritime-security practices encounter different configurations of authority and institutional capacity. Global Governance Theory complements this perspective by recognising forms of coordination involving states, international and regional institutions and non-state actors [5]. Together, the theories enable analysis both of how governance practices travel and of the structures of authority into which they are incorporated.

The central argument is that the evolution of anti-piracy governance from the Horn of Africa to the Gulf of Guinea represents selective policy transfer rather than institutional replication. Practices including maritime domain awareness, information sharing, legal cooperation, capacity building and regional coordination proved comparatively adaptable. The Yaoundé framework specifically incorporates information sharing, operational coordination and strengthened domestic legal frameworks. Conversely, the extensive external intervention associated with Somalia encounters greater political and jurisdictional constraints in a region where states assert stronger sovereign authority over maritime enforcement.

Sovereignty should therefore be understood not simply as an obstacle to collective action, but as a constitutive filter of policy transfer. It influences which external practices are politically and legally acceptable and how they are reconstructed within regional arrangements. Building upon this proposition, the article conceptualises this process as institutional translation. Rather than transplantation of an ostensibly successful model, translation entails the interpretation, modification and reconstruction of governance practices within the receiving environment. The distinction separates policy effectiveness from policy transferability: a practice that succeeds in one region does not automatically constitute an appropriate model for another.

The article thus moves beyond the search for universally replicable anti-piracy 'best practices'. The trajectory from Somalia to the Gulf of Guinea demonstrates that maritime-security governance is filtered through sovereignty, institutional structures and regional political agency. Durable policy transfer depends not upon imitation, but upon the capacity to reconcile external policy learning with the legal, political and institutional conditions of the receiving region.

Literature Review and Research Gap

Scholarship on piracy governance has expanded considerably over the past two decades, reflecting broader shifts in maritime security and global governance. Early analyses of Somali piracy primarily explained the phenomenon through state failure. Menkhaus and Hansen argued that the collapse of Somali governmental institutions following 1991 created a governance vacuum in which organised piracy networks could emerge and operate with relative impunity [6]. Piracy was therefore understood not merely as a maritime crime but as a symptom of institutional fragility on land. Subsequent scholarship shifted attention from causes to responses. Studies of multinational naval operations, including EU NAVFOR Operation Atalanta, Combined Task Force 151 and NATO's Operation Ocean Shield, highlighted unprecedented forms of international security cooperation [7]. Scholars further identified how legal reforms, intelligence-sharing mechanisms, industry-led Best Management Practices (BMPs) and privately contracted armed security personnel contributed to the

decline of piracy incidents after 2012 [8]. More recently, piracy governance has been conceptualised as a form of global maritime governance involving interactions among states, international organisations, shipping industries and private security actors [9].

While this literature provides valuable insight into the evolution of anti-piracy governance, it remains primarily concerned with explaining why Somali piracy emerged and why it declined. Less attention has been devoted to the broader policy legacy of the Somali experience. Somalia is frequently treated as a successful governance case, yet the question of whether, and how, its governance practices influenced responses elsewhere remains largely unexplored.

A similar limitation characterises scholarship on the Gulf of Guinea. Researchers have analysed the region's distinctive forms of maritime insecurity, emphasising their links to oil theft, illegal bunkering, kidnapping, trafficking and transnational organised crime [10]. Unlike Somalia, however, insecurity in the Gulf of Guinea emerged within states that retained varying levels of institutional authority and territorial control. Consequently, scholarship has focused on regional cooperation mechanisms, particularly the Yaoundé Code of Conduct and the broader Yaoundé Architecture for Maritime Safety and Security. Although these studies provide important assessments of maritime cooperation, resource constraints and implementation challenges, they generally treat regional governance developments as endogenous responses rather than examining their relationship to earlier anti-piracy initiatives elsewhere. The limitations of both literatures reveal a broader weakness within maritime governance scholarship. Contemporary maritime-security studies increasingly recognise that security provision extends beyond the state and depends upon interactions among governments, international organisations, regional institutions, commercial actors and private security providers [11]. Yet existing research remains largely static in its treatment of governance arrangements, focusing on how governance structures operate rather than how they evolve, travel and adapt across regions. Consequently, the mechanisms through which maritime-security practices diffuse and are reconstructed in new institutional settings remain poorly understood.

To address this gap, this article combines Policy Transfer Theory and Global Governance Theory. Policy Transfer Theory defines transfer as a process through which knowledge about policies, institutions and administrative arrangements in one setting informs policy development elsewhere. Crucially, transfer does not imply replication. Policies may be selectively adopted, modified or rejected according to local political and institutional conditions. The theory therefore directs attention to processes of learning, adaptation and resistance rather than simple policy copying. Global Governance Theory complements this approach by focusing on the diffusion of authority across multiple actors and levels of governance. Rather than viewing states as the sole providers of security, global governance scholars highlight the role of international organisations, regional institutions, private actors and transnational networks in addressing collective problems. Maritime security provides a particularly relevant illustration because threats at sea routinely transcend national jurisdictions and require coordination among diverse actors.

Combining these perspectives enables a more dynamic understanding of anti-piracy governance. Policy Transfer Theory explains how governance practices move between regions, while Global Governance Theory explains the institutional environments within which those practices are received and adapted. This integrated framework provides the basis for examining whether the governance innovations associated with Somali piracy travelled to the Gulf of Guinea and, more importantly, why some practices were adopted while others were modified or rejected. The central gap in existing scholarship is therefore not a lack of knowledge about piracy itself, but a lack of understanding of how anti-piracy governance evolves across regions. This article addresses that gap by analysing the movement of governance practices from Somalia to the Gulf of Guinea and arguing that what occurred was not institutional replication, but selective policy transfer shaped by sovereignty, regional agency and institutional context.

Theoretical Framework: Governance, Policy Transfer and Institutional Translation

The foregoing review identified an important gap in existing scholarship. While studies of maritime governance increasingly recognise the involvement of multiple actors in anti-piracy responses, and policy-transfer scholarship explains how governance practices travel across jurisdictions, neither perspective independently explains how anti-piracy governance evolved from Somalia to the Gulf of Guinea. This article therefore combines Global Governance Theory and Policy Transfer Theory within a single analytical framework. Global Governance Theory provides a lens for understanding the institutional environments within which anti-piracy governance operates. Rather than viewing maritime security as the exclusive responsibility of states, the theory emphasises the role of international organisations, regional institutions, commercial actors and transnational networks in addressing collective problems [12]. More recent policy-transfer scholarship has further emphasised that transferred policies undergo processes of reinterpretation, experimentation and institutional reconstruction within receiving jurisdictions [13]. Maritime security is particularly suited to this perspective because piracy and related maritime threats

routinely transcend national jurisdictions and require cooperation among diverse actors. The Somali response illustrates a highly internationalised governance structure involving the United Nations, the International Maritime Organization (IMO), multinational naval coalitions, private security providers and commercial shipping interests. By contrast, the Gulf of Guinea is characterised by a more regionally embedded governance framework centred upon ECOWAS, ECCAS and the Gulf of Guinea Commission through the Yaoundé Architecture.

Global Governance Theory therefore provides a basis for comparing how authority, responsibility and coordination are organised across different maritime-security environments. However, understanding governance structures alone does not explain how governance practices evolve across regions. For this reason, the article also employs Policy Transfer Theory. Dolowitz and Marsh define policy transfer as the process through which knowledge about policies, institutions and administrative arrangements developed in one setting influences policy development elsewhere. Crucially, policy transfer does not imply policy replication. Governance practices may be selectively adopted, adapted or rejected according to local institutional, legal and political circumstances. Applied to maritime security, Policy Transfer Theory directs attention towards the movement of governance practices associated with the Somali anti-piracy response, including information-sharing arrangements, maritime domain awareness systems, legal cooperation mechanisms and regional coordination structures. The analytical focus is not simply whether such practices appeared in the Gulf of Guinea, but how they were transformed during the transfer process.

Building upon these perspectives, this article introduces the concept of institutional translation. Existing policy-transfer scholarship generally acknowledges that transferred policies undergo adaptation. Institutional translation extends this insight by emphasising that governance practices are reconstructed within new distributions of authority, legitimacy and sovereignty. They are not merely copied or modified but reinterpreted and embedded within different institutional environments. This concept is particularly important in explaining the relationship between Somalia and the Gulf of Guinea. Certain governance practices proved transferable because they could be integrated within existing regional structures. Others encountered political and legal resistance, particularly where they conflicted with prevailing understandings of sovereignty and regional ownership. Governance outcomes therefore reflected neither direct replication nor complete divergence, but a process of selective transfer mediated by local institutional conditions. The article consequently proceeds from two propositions. First, anti-piracy governance is best understood as a form of global governance involving interactions among multiple public and private actors. Second, governance practices travel through processes of selective policy transfer and institutional translation rather than institutional replication. These propositions provide the analytical foundation for examining the evolution of anti-piracy governance from Somalia to the Gulf of Guinea.

Somalia As a Source of Maritime Governance Innovation

The significance of the Somali piracy crisis extends beyond the suppression of attacks in the Western Indian Ocean. From the perspective of policy transfer, Somalia functioned as a laboratory of maritime governance innovation in which legal, operational and institutional responses were developed to address a transnational maritime threat. The importance of the Somali experience therefore lies not merely in its effectiveness, but in the governance practices it generated and their potential applicability beyond the Horn of Africa.

The first innovation was legal. Although the United Nations Convention on the Law of the Sea (UNCLOS) provides a framework for the repression of piracy through universal jurisdiction and obligations of interstate cooperation, the Somali crisis exposed the practical limitations of existing legal mechanisms when piracy emanated from the territory and territorial waters of a failed state. In response, the United Nations Security Council adopted a series of resolutions, most notably Resolutions 1816, 1838, 1846 and 1851, which authorised cooperating states, with Somalia's consent, to conduct counter-piracy operations within Somali territorial waters and established an exceptional framework for international cooperation. These measures transformed piracy from a predominantly law-enforcement issue into a matter of international peace and security, demonstrating that effective maritime security governance requires legal arrangements capable of enabling coordinated action across jurisdictions. The second innovation concerned the organisation of security cooperation. Anti-piracy efforts in Somalia generated an unprecedented level of coordination among naval forces, international organisations and regional actors. Initiatives such as Combined Task Force 151 and the European Union's Operation Atalanta operated through flexible arrangements based on shared objectives rather than traditional alliance structures. Their significance lay not simply in the deployment of naval assets, but in the creation of mechanisms through which diverse actors could coordinate surveillance, enforcement and information exchange while maintaining institutional autonomy. The Somali experience therefore demonstrated that complex maritime threats could be managed through networked forms of governance rather than through unilateral state action alone.

Closely connected to this development was the emergence of maritime domain awareness as a central component of anti-piracy governance. The suppression of Somali piracy depended increasingly upon information-sharing centres, reporting systems and surveillance mechanisms capable of generating a common operational picture among governments, naval forces and commercial stakeholders [14]. Governance consequently shifted from a narrow emphasis on interdiction towards an appreciation of information as a strategic resource. This lesson proved particularly important because information-sharing mechanisms could be adapted to different institutional environments without requiring substantial transfers of coercive authority.

The Somali response also transformed the relationship between public and private actors in maritime security. Industry-led Best Management Practices (BMPs) encouraged shipping companies to adopt preventative security measures, while the growing use of privately contracted armed security personnel extended responsibility for security beyond states and naval forces. Commercial actors became active participants in governance rather than passive beneficiaries of public protection. In this respect, the Somali case represents one of the clearest examples of polycentric maritime governance, where security outcomes were produced through interactions among public authorities, private firms and international organisations. Yet the expansion of private security also generated concerns regarding accountability, oversight and the regulation of force at sea, illustrating the tensions inherent in contemporary global-security governance [15].

Collectively these developments produced a sophisticated governance architecture that extended beyond conventional naval intervention. More importantly, they generated a set of practices that appeared transferable beyond the Somali context. Legal coordination, multinational cooperation, maritime domain awareness and public-private partnership emerged as the most significant governance innovations associated with the Somali response. However, their transferability should not be overstated. As argued in the preceding section, governance practices do not travel through institutional replication but through processes of institutional translation. The Somali model was itself a product of exceptional circumstances, including state collapse, extensive international involvement and extraordinary Security Council authorisations. Not all elements of that framework were therefore equally portable to other regions. The broader significance of Somalia lies in its role as a source of governance lessons rather than as a governance template. While certain innovations proved capable of adaptation across different maritime-security environments, others remained closely linked to the unique political and legal conditions from which they emerged. The central question, therefore, is not whether the Gulf of Guinea adopted the Somali model, but how particular governance practices were translated into a regional context characterised by stronger state authority, established regional organisations and heightened sensitivity to questions of sovereignty. It is to that process of institutional translation that the analysis now turns.

The Gulf of Guinea and The Localisation of Anti-Piracy Governance

The rise of maritime insecurity in the Gulf of Guinea did not produce a replication of the Somali anti-piracy model. Instead, regional actors selectively adapted governance practices associated with the Somali response while rejecting elements considered inconsistent with local political and institutional realities. The resulting architecture reflects a process of institutional translation in which imported governance practices were reconstructed within a context characterised by functioning states, established regional organisations and stronger commitments to sovereignty. From a policy-transfer perspective, the significance of the Gulf of Guinea therefore lies not in policy adoption but in policy adaptation. The most visible expression of this process was the creation of the Yaoundé Architecture following the 2013 Yaoundé Summit and the adoption of the Yaoundé Code of Conduct. The framework established a system of national, zonal and regional coordination centres designed to facilitate information sharing, maritime domain awareness and operational cooperation among West and Central African states. In functional terms, these arrangements reflected lessons also evident in the Somali response, where information sharing and coordination had become central components of anti-piracy governance. Yet the architecture differed fundamentally in its institutional design. Rather than relying upon externally directed security structures, the Yaoundé framework embedded coordination within African-led institutions and explicitly preserved state authority over territorial waters and maritime enforcement. Recent assessments suggest that the principal contribution of the Yaoundé Architecture lies not in creating supranational authority but in strengthening coordination and information-sharing among participating states while preserving sovereignty [16].

The roles played by the Economic Community of West African States (ECOWAS), the Economic Community of Central African States (ECCAS) and the Gulf of Guinea Commission further illustrate this process of localisation. During the Somali crisis, international institutions and multinational naval coalitions occupied central governance positions. In the Gulf of Guinea, by contrast, regional organisations became the primary vehicles through which maritime-security cooperation was

pursued. These institutions incorporated maritime domain awareness, legal harmonisation, capacity building and collective security into broader regional governance agendas [17]. The result was a governance architecture rooted not in temporary international intervention but in existing regional political structures. This distinction reflects more than institutional preference. It reflects a different distribution of authority. Unlike Somalia, where the absence of effective state institutions facilitated extensive international involvement, Gulf of Guinea states remained determined to retain primary responsibility for maritime security. Consequently, governance innovations associated with Somalia were accepted insofar as they strengthened regional and national capabilities but were resisted where they appeared to dilute sovereign control [18]. The emphasis on regional ownership therefore represented both a political choice and a governance strategy.

A similar pattern can be observed in capacity-building efforts. One of the principal lessons of the Somali experience was the importance of institutional capacity, legal cooperation and maritime domain awareness. Gulf of Guinea states incorporated these lessons through investments in maritime-security strategies, surveillance systems, coastguard capabilities and legal reforms. Nigeria, Ghana, Côte d'Ivoire, Cameroon and other coastal states increasingly integrated maritime security into national development and security policies [19]. Yet these initiatives differed from the Somali model in an important respect. Rather than relying upon external substitution for weak state institutions, regional governments sought to strengthen indigenous enforcement and governance capacities. Capacity building therefore became an exercise in reinforcing sovereignty rather than compensating for its absence. The treatment of private security provides a further illustration of selective adaptation. In Somalia, privately contracted armed security personnel became an important element of anti-piracy governance and enjoyed widespread acceptance among shipping operators. In the Gulf of Guinea, however, attitudes towards private maritime security remained considerably more cautious. Concerns regarding sovereignty, jurisdiction and control over the use of force encouraged governments to favour state-led security arrangements and more limited forms of public-private cooperation [20]. Consequently, one of the most visible components of the Somali model was among the least transferable.

The comparative evidence therefore demonstrates that governance practices associated with the Somali response did influence maritime-security developments in West and Central Africa. Information sharing, maritime domain awareness, regional coordination, legal cooperation and capacity building all became prominent features of the Gulf of Guinea architecture. However, these practices were not adopted in their original form. Instead, they were embedded within institutions designed to preserve regional ownership and sovereign authority. Elements associated with extensive external intervention and private security were either modified substantially or largely rejected. From the perspective of institutional translation, this outcome is unsurprising. Governance practices do not travel independently of the political environments into which they are introduced. Their eventual form is shaped by existing institutions, distributions of authority and prevailing conceptions of legitimacy. The Gulf of Guinea therefore demonstrates that anti-piracy governance evolved not through the transplantation of a successful model, but through the selective adaptation of governance innovations to local political and institutional conditions. The result was a distinctly African maritime-security architecture that drew lessons from Somalia while remaining fundamentally shaped by regional priorities and sovereignty concerns.

Selective Policy Transfer, Sovereignty and Institutional Translation

The comparison between Somalia and the Gulf of Guinea demonstrates that anti-piracy governance evolved through neither simple diffusion nor institutional replication. Instead, governance practices travelled selectively and were subsequently reshaped by regional political priorities, institutional capacities and sovereignty considerations. This finding supports the article's central argument that maritime-security governance develops through processes of institutional translation rather than transplantation, and aligns with contemporary policy-transfer scholarship, which increasingly regards adaptation and reconstruction as normal features of governance diffusion rather than deviations from it. The evidence reveals three distinct transfer outcomes. For analytical purposes, these outcomes may be categorised as transfer, adaptation and rejection, each reflecting different levels of compatibility between imported governance practices and regional sovereignty structures.

First, several governance innovations were successfully transferred because they were institutionally flexible, politically acceptable and compatible with existing regional structures. These included information-sharing mechanisms, maritime domain awareness systems, legal cooperation arrangements, capacity-building initiatives and principles of regional coordination. Such practices enhanced governance capabilities without requiring significant transfers of authority away from participating states. Their adoption within the Yaoundé Architecture demonstrates that governance innovations are most likely to travel when they complement rather than challenge existing institutional frameworks. Second, several governance mechanisms were adapted during the transfer process.

Multilateral coordination structures, capacity-building programmes and public-private partnerships were not reproduced in the form developed during the Somali response [21]. Instead, they were incorporated into pre-existing regional institutions, particularly ECOWAS, ECCAS and the Gulf of Guinea Commission [22]. This adaptation reflects a central insight of policy-transfer scholarship: governance practices rarely move unchanged. Rather, they are modified to align with local political preferences, organisational structures and security priorities. In the Gulf of Guinea, adaptation enabled regional policymakers to utilise lessons derived from Somalia while maintaining African ownership of maritime-security governance.

Third, some governance innovations were substantially resisted or rejected. Large-scale multinational naval deployments, extensive reliance on private armed security personnel and externally led security structures did not become central features of the Gulf of Guinea framework [23]. Although these arrangements were often associated with the success of anti-piracy efforts off Somalia, they encountered greater political resistance in West Africa because they raised concerns regarding sovereignty, jurisdiction and external influence [24]. Their rejection is significant because it demonstrates that the perceived effectiveness of a governance mechanism does not guarantee its transferability.

Sovereignty emerges as the principal factor explaining these different outcomes. Much of the Somali governance architecture developed under conditions of state fragility and exceptional Security Council authorisation, circumstances that enabled unprecedented forms of international intervention. By contrast, Gulf of Guinea states retained effective governmental institutions and remained determined to exercise primary authority over maritime-security governance. Consequently, governance innovations were filtered according to their compatibility with regional ownership and sovereign control. Mechanisms that strengthened state and regional capacity were generally accepted; those that appeared to substitute for state authority were not.

These findings challenge assumptions that successful security-governance models can be exported across jurisdictions as coherent packages. The Somali experience produced influential governance innovations, but these innovations acquired legitimacy in West Africa only after substantial modification. Governance did not travel as a complete architecture. Instead, it was disaggregated into specific practices that were selectively adopted, adapted or rejected. The transfer process therefore depended not on the intrinsic qualities of individual governance mechanisms, but on their compatibility with local political and institutional environments. The article conceptualises this process as institutional translation. Unlike institutional transplantation, which implies the replication of governance arrangements across settings, translation emphasises reconstruction within new distributions of authority and legitimacy. Governance innovations originating in Somalia were interpreted through the institutional realities of West and Central Africa and embedded within structures designed to preserve sovereignty and regional agency. The Gulf of Guinea should therefore be understood not as a recipient of governance models, but as an active site of governance production. The comparison consequently reveals that localisation is not an obstacle to policy transfer. Rather, it is the mechanism through which transfer becomes possible. Governance practices acquire durability and legitimacy only when reconciled with local political conditions. The evolution of anti-piracy governance from Somalia to the Gulf of Guinea thus demonstrates that successful maritime-security governance depends as much upon adaptation as upon learning.

Implications For Maritime Governance and International Law

The findings have broader implications for debates concerning maritime governance, global governance and international law. These findings are also relevant to emerging debates concerning the relationship between maritime security and Africa's blue economy. Contemporary maritime-governance frameworks increasingly recognise that the protection of maritime trade, offshore energy infrastructure, fisheries and marine resources requires integrated approaches linking security and sustainable development [25]. First, they challenge linear understandings of policy diffusion. The Somalia-Gulf of Guinea comparison demonstrates that governance effectiveness and governance transferability are distinct concepts. A governance mechanism may prove successful in one setting yet encounter significant obstacles when introduced elsewhere. The question for policymakers is therefore not whether a model worked, but whether it is compatible with the institutional and political conditions of the receiving environment. Second, the analysis contributes to global-governance scholarship by highlighting the role of regional agency. Existing studies often focus on how international norms and governance practices spread across jurisdictions. The Gulf of Guinea experience demonstrates that regional actors are not passive recipients of external governance models. Rather, they actively determine which practices are adopted, which are modified and which are rejected. Governance outcomes consequently emerge through interaction between global ideas and local institutions rather than through one-directional diffusion.

Third, the study has implications for international maritime-security policy. Contemporary threats increasingly extend beyond piracy to include trafficking,

illegal fishing, cyber threats and transnational organised crime. Efforts to strengthen maritime governance should therefore prioritise adaptable mechanisms such as information sharing, maritime domain awareness, legal cooperation and capacity building rather than assuming that operational models developed in one region can be replicated elsewhere. More broadly, the article highlights the continuing importance of sovereignty in the governance of transnational security threats. Contrary to claims that global governance diminishes state authority, the Gulf of Guinea demonstrates how sovereign states remain central participants in designing, shaping and legitimising security arrangements. Effective cooperation does not require the abandonment of sovereignty; rather, it depends upon institutional forms capable of reconciling collective action with political ownership. The future development of maritime-security governance is therefore likely to depend less on exporting successful models and more on tailoring governance innovations to diverse regional environments.

CONCLUSION

This article examined the evolution of anti-piracy governance from Somalia to the Gulf of Guinea through the combined lenses of Policy Transfer Theory and Global Governance Theory. Moving beyond conventional analyses of piracy as a security problem, it explored how governance practices developed in one maritime-security environment travelled, evolved and acquired legitimacy in another. The analysis demonstrates that important governance innovations associated with the Somali anti-piracy response influenced subsequent maritime-security developments in the Gulf of Guinea. Information-sharing mechanisms, maritime domain awareness systems, legal cooperation arrangements, capacity-building initiatives and principles of regional coordination all became prominent features of governance architectures in both regions. However, these practices were not transferred as a coherent package. Rather, they underwent substantial modification as they were incorporated into the political and institutional realities of West and Central Africa.

The central finding of the article is therefore that governance innovations travelled, but governance models did not. Mechanisms that strengthened coordination, information exchange and institutional capacity proved relatively transferable because they could be embedded within existing regional structures. By contrast, governance arrangements associated with extensive international intervention, foreign-led security governance and widespread reliance on private armed security encountered greater resistance because they conflicted with prevailing understandings of sovereignty and regional ownership. These findings contribute to both maritime-security scholarship and policy-transfer research. Existing studies have largely examined Somali piracy and Gulf of Guinea maritime insecurity as separate phenomena. By tracing the relationship between the two cases, this article demonstrates how maritime-security governance evolves through processes of institutional learning, adaptation and reconstruction. The comparative analysis further supports the argument that governance diffusion is best understood as a process of institutional translation rather than institutional replication. Governance practices do not move unchanged across regions; they are filtered through local political priorities, institutional capacities and distributions of authority before being incorporated into new governance frameworks. More broadly, the article highlights the continuing importance of sovereignty in contemporary global governance. The Gulf of Guinea was not a passive recipient of governance innovations developed elsewhere. Regional actors exercised agency in determining which practices to adopt, which to modify and which to reject. Localisation therefore emerged not as an obstacle to governance transfer but as the mechanism through which governance innovations acquired political legitimacy and institutional durability. The evolution of anti-piracy governance from Somalia to the Gulf of Guinea ultimately demonstrates that governance innovations travel, but governance models rarely do. Effective maritime-security governance depends less on the export of successful institutional arrangements than on the capacity of states and regional organisations to translate external lessons into locally legitimate forms. By conceptualising this process as institutional translation, the article contributes a new perspective to debates on maritime governance, policy transfer and security cooperation, while providing a framework for understanding how anti-piracy practices may evolve in other regions confronting emerging maritime-security threats.

REFERENCE

1. United Nations. United Nations Convention on the Law of the Sea. Adopted 10 Dec. 1982, entered into force 16 Nov. 1994, arts. 100–101.
2. United Nations Security Council. Resolution 1816. 2 June 2008, UN Doc. S/RES/1816 (2008), para. 7.
3. Dolowitz, David P. and David Marsh. "Learning from abroad: The role of policy transfer in contemporary policy-making." Governance, vol. 13, 2000, pp. 5–24.
4. Code of Conduct Concerning the Repression of Piracy, Armed Robbery against Ships, and Illicit Maritime Activity in West and Central Africa. Adopted at Yaoundé, June 2013. ("Yaoundé Code of Conduct").
5. Rosenau, James N. and Ernst-Otto Czempiel, editors. Governance without Government: Order and Change in World Politics. Cambridge University Press, 2009.
6. Menkhaus, Ken. Somalia: A Country in Peril, a Policy Nightmare. ENOUGH Strategy Paper, Sept. 2008.
7. Hansen, Stig Jarle. Piracy in the Greater Gulf of Aden. Norwegian Institute for Urban and Regional Research, Oct. 2009.

8. Kraska, James, and Brian Wilson. "Combating pirates of the Gulf of Aden: The djibouti code and the somali coast guard." Ocean Development and International Law, vol. 52, 2009, pp. 235.
9. Murphy, Martin N. Somalia, the New Barbary? Piracy and Islam in the Horn of Africa. Hurst, 2011.
10. Shortland *et al*. "The protector's choice: An application of protection theory to somali piracy." British Journal of Criminology, vol. 54, 2014, pp. 741.
11. Bueger, Christian. "What Is Maritime security?" Marine Policy, vol. 53, 2015, pp. 159.
12. Onuoha, Freedom C. "Piracy and Maritime Security in the Gulf of Guinea: Trends, concerns, and propositions." The Journal of the Middle East and Africa, vol. 4, 2013, pp. 267.
13. Kooiman, Jan. Governing as Governance. Sage, 2003.
14. Bueger, *et al*. "Beyond Seablindness: A New Agenda for Maritime Security Studies." International Affairs, vol. 43, 2017, pp. 1293.
15. Weiss, Thomas G. "Governance, good governance and global governance." Third World Quarterly, vol. 21, 2000, pp. 795.
16. Stone, Diane. "Understanding the transfer of policy failure: Bricolage, Experimentalism and translation." Policy & Politics, vol. 45, 2017, pp. 55.
17. Benson, David, and Andrew Jordan. "What have we learned from policy transfer research? Dolowitz and marsh revisited." Political Studies Review, vol. 9, 2011, pp. 366.
18. Bueger, Christian. "Learning from piracy? Future challenges of maritime security governance." Global Affairs, vol. 1, 2015, pp. 33.
19. Dunigan, Molly. Victory for Hire: Private Security Companies' Impact on Military Effectiveness. Stanford University Press, 2011.
20. Percy *et al*. "The Business of Piracy in Somalia." Journal of Strategic Studies, vol. 36, 2013, pp. 541.
21. Mohammed, Adam. "Maritime security governance in the Gulf of Guinea: Opportunities and challenges of states' responses." The Journal of Territorial and Maritime Studies, vol. 10, 2023, pp. 60–77.
22. Ali, Kamal-Deen. Maritime Security Cooperation in the Gulf of Guinea: Prospects and Challenges. Brill Nijhoff, 2015, pp. 112.
23. Schandorf, Stephanie Oserwa. "Reimagining Counter-Piracy Efforts in the Gulf of Guinea: Lessons from the Theory of Infrastructure for Coordination and Information Sharing." African Security Review, vol. 33, 2024, pp. 403.
24. Saripudin, Mohamad Hery, and Mansur Juned. "Divergent tides: A comparative analysis of regional security regimes and counter-piracy effectiveness in the Gulf of Aden and Gulf of Guinea." Frontiers in Political Science, vol. 8, 2026.
25. Yücel, Hüseyin. "Sovereignty and transnational cooperation in the Gulf of Guinea: How a network approach can strengthen the yaoundé architecture." Scandinavian Journal of Military Studies, vol. 4, no. 1, 2021, pp. 146–157.