Recommendation 23-16: Draft 2026 List of vessels presumed to have carried out IUU fishing activities

Introduction

The Draft List of vessels presumed to have carried out IUU fishing activities will be included in the Excel attached as Appendix 1 (**PWG_405_Appendix_1/2026)**, as extracted from the ICCAT IUU databases. It contains two complementary structures: 1) the current database and 2) the historical database, as also shown on the ICCAT web page.

Explanatory Notes to the Draft 2026 IUU List of Vessels

Within the framework of implementation of paragraph 11 of Rec. 23-16
Intersessional incorporation of IUU vessel lists of other RFMOs

As provided for in the *Recommendation by ICCAT amending Recommendation 21-13 on establishing a List of vessels presumed to have carried out illegal, unreported and unregulated fishing activities* (Rec. 23-16), the nine RFMOs and their IUU vessel lists are as follows:

- Western and Central Pacific Fisheries Commission (WCPFC)
- Inter-American Tropical Tuna Commission (IATTC)
- Indian Ocean Tuna Commission (IOTC)
- Commission for the Conservation of Antarctic Marine Living Resources (CCAMLR):
  https://www.ccamlr.org/en/compliance/contracting-party-iuu-vessel-list
  https://www.ccamlr.org/en/compliance/iuu-vessel-lists
- Commission for the Conservation of Southern Bluefin Tuna (CCSBT)
- General Fisheries Commission for the Mediterranean (GFCM)
- Northwest Atlantic Fisheries Organisation (NAFO)
- North East Atlantic Fisheries Commission (NEAFC):
  https://www.neafc.org/mcs/iuu/alist
  https://www.neafc.org/mcs/iuu/blist
- South East Atlantic Fisheries Organisation (SEAFO)

NB: Photographs of some of the IUU vessels listed can be found on the websites of these nine RFMOs.

Summary of cross-referenced 2026 IUU vessel lists and updates/modifications made

Nine RFMOs	*Incorporation in the ICCAT IUU List*	*Removal from the IUU List*	*Changes made to the ICCAT IUU List from other lists or following new information communicated by CPCs (in databases)*	*No change or minor modifications*	*Total actions*
Total	**3**	**3**	**1**	**158**	**11**

The Draft 2026 ICCAT IUU List of vessels contains **169** active vessels.

Information on the 2026 ICCAT IUU List of Vessels

1. Regarding IUU vessels incorporated by ICCAT through cross-referencing with the IUU lists of other RFMOs (paragraph 11 of Rec. 23-16):

1. The WCPFC communicated on 21 January 2026 its IUU Vessel Lists, as adopted at the last annual WCPFC Commission meeting (WCPFC22). As communicated by ICCAT Circular #00446/2026, this update reflected the modification of the owner and operator details of vessel YU FONG 168 (ICCAT IUU Serial No. 20130002).

2. The IOTC communicated on 20 May 2026 its IUU Vessel Lists, as adopted at the last annual IOTC Commission meeting (S30). As communicated by ICCAT Circular #04466/2026, the IOTC has added one vessel to its IUU Vessels List named KEBA (ICCAT IUU Serial No. 20260001) and removed three vessels flagged to India named AVEMARIYA (ICCAT IUU Serial No. 20220001), EMMANUEL (ICCAT IUU Serial No. 20230007) and MANJUMATHA (ICCAT IUU Serial No. 20240010).

3. One IUU vessel has been added to the ICCAT IUU Vessel List through cross-listing following the adoption of the final GFCM IUU Vessel List. As no objections were received from ICCAT CPCs further to ICCAT Circular No. 05919/2026 of 16 July 2026, the vessel SONIA was cross-listed on the ICCAT IUU Vessel List and assigned ICCAT IUU serial number 20260002.

4. The Egyptian-flagged vessel AL'AMIR MUHAMMAD was added to the Draft ICCAT IUU Vessel List on 29 October 2026, following its cross-listing from the GFCM IUU Vessel List. While this vessel was originally included on the GFCM IUU Vessel List in October 2018, its inclusion in the ICCAT list is now being formally processed to align both lists. Pursuant to paragraph 11 of Recommendation 23-16, vessels cross-listed from other RFMOs shall be included on the Final ICCAT IUU Vessel List unless a Contracting Party objects within 30 days of the date of transmittal by the Executive Secretary. As this period extends beyond the Annual Meeting, during which the Commission is expected to review and adopt the Final ICCAT IUU Vessel List, the Commission may wish to consider endorsing the proposed inclusion of this vessel, subject to the absence of any objection within the remaining period.

2. Issues related to the final ICCAT IUU list that were raised during 2026

In accordance to the provisions of paragraph 2 of Rec. 23-16, CPCs must transmit every year to the Executive Secretary, at least 70 days before the annual meeting, information on any vessels presumed to be carrying out IUU fishing activities within the last three years, accompanied by all available supporting evidence concerning the presumption of IUU fishing activity and vessel identification information, and as of 2 November 2026, the Secretariat has received one communication from the European Union.

The European Union communicated alleged fishing irregularities to ICCAT's attention through two separate procedures, under Recommendations 08-09 and 23-16, as outlined below:

- **Potential non-compliance with ICCAT conservation and management measures (Rec. 08-09):** pursuant to paragraph 1 of Recommendation 08-09, the EU reported possible non-compliance by Türkiye. This communication together with Türkiye´s response will be made available in the document "Information received under Recommendation by ICCAT to establish a process for the review and reporting of compliance information (Rec. 08-09) and responses" [COC_312/2026].

- **Alleged IUU fishing activities (Rec. 23-16):** pursuant to paragraph 2 of Recommendation 23-16, the EU communicated on 8 September 2026, a CP11 form (**PWG_405_ANN_1/2026)** with information on alleged IUU fishing activities conducted by four vessels: one vessel flagged under Tunisia named DINA AMIR, and the three vessels flagged under Türkiye previously reported under Recommendation 08-09. This information was shared with all CPCs via ICCAT Circular #07575/2026. As response:

    - On 28 October 2026, Türkiye subsequently submitted a detailed report (**Attachment 1**) presenting the findings of its investigation that was circulated via ICCAT Circular #09771/2026. Following Türkiye's response, on 4 November 2026, the EU communicated to the Secretariat its decision to no longer support the inclusion of the three Turkish vessels into the Draft ICCAT IUU Vessel List (**Attachment 2**). This information was circulated via ICCAT Circular #09783/2026.

    - On 4 November 2026, Tunisia submitted a detailed report (**Attachment 3**) presenting the findings of its investigation, which was circulated to all CPCs via ICCAT Circular #09839/2026.

REPUBLIC OF TURKIYE
MINISTRY OF AGRICULTURE AND FORESTRY

General Directorate of Fisheries and Aquaculture

Kayit Sayisi: 27444002
28.10.2026 11:31:00 tarihinde
Deniz ERKOL giden evrak kaydi
yapmistir

Ref 'o : 67852565-730(ICCAT)-

October 28, 2026

SUBJECT: RESPONSE BY TURKIYE TO ICCAT CIRCULAR #07575/2026 INFORMATION SUBMITTED BY THE EUROPEAN UNION FOR THE INCLUSION OF FOUR VESSELS IN THE DRAFT IUU LIST

Dear Mr. Camille Manel;

On behalf of the Republic of Türkiye, I acknowledge the receipt of ICCAT Circular under which three (3) Turkish vessels have been proposed to be included in the Draft ICCAT JUU List under ICCAT Recommendation 23-16.

As the flag CPC of those three (3) Turkish vessels· the investigation into the matter was initiated as soon as the Italian Coast Guard began issuing warnings instructing the Turkish fishing vessels concerned to leave the area claimed by Italy as its EEZ.

In this regard; the detailed report of the investigation was submitted to the Secretariat on 16 October 2026 for circulation in response to the ICCAT Circular dated 20 July 2026.

Hereby; I would like to submit the summary of results on the investigation the progress made and the effective action taken.

First and foremost, I would like to express once again our appreciation to the EU for the attention and diligence it has demonstrated in this matter.

Türkiye submitted its' 2026 Eastern Atlantic and Mediterranean Bluefin Tuna Fishing, Farming, Inspection and Capacity Management Plan" to the ICCAT Secretariat on 13 February 2026.

The Plan stated that *"It is expected that some BFT-E fishing operators may prefer to carry out fishing activities in accordance with Rec. 25-04 on the high seas of the Mediterranean Sea (possibly within FAO Area 37.2) during the period from 19 May to 1 July."*

Türkiye's Plan was subsequently endorsed.

ln this regard, certain Turkish fishing vessels arrived in the aforementioned FAO Area Code 37.2 on 19 May 2026 to engage in fishing activities in accordance with ICCAT rules. The area in question constitutes an international fishing area that has traditionally and historically been used for bluefin tuna fishing for many years by Turkish fishing vessels, as well as by fleets from several other countries, in accordance with the applicable ICCAT conservation and management measures.

All Turkish fishing vessels operating in this area are duly authorized by Türkiye and operate under quotas allocated in accordance with Türkiye's domestic bluefin tuna fishing regulations. These vessels are registered with ICCAT, have an ICCAT Regional Observer on board, and are subject to continuous monitoring through real-time VMS transmission. Accordingly, their activities are conducted under the required monitoring and control systems established by Türkiye and ICCAT.

From the time of their arrival in the area, the vessels began receiving communications requesting that they immediately cease their fishing activities and move to a position beyond 25 nautical miles from the coast, notwithstanding the fact that all vessels were operating outside Italy's 12-nautical-mile territorial sea.

While the vessels were located approximately 18-20 nautical miles off the southeastern tip of the Island of Sicily (off Isola di Capo Passero), the Turkish fishing vessels operating in the area were contacted individually through communications from the same radio station, which were stated to have been made on behalf of the Italian Coast Guard. During these communications, it was stated that the vessels were within Italy's "Exclusive Economic Zone" and they were requested to immediately cease their fishing activities and, on this occasion, proceed to a position 200 nautical miles from the coast.

Given the conflicting distances cited in the warnings issued by the Italian Coast Guard, the precise geographical boundaries of the EEZ declared by Italy could not be definitively determined by the Turkish fishers and by our side, leaving the boundary claim ambiguous from our perspective. Nevertheless, the vessels' VMS records conclusively demonstrate that at no point did the vessels infringe upon Italy's 12-nautical-mile territorial sea and verifies that when the communications were received, the vessels were positioned at least 18 nautical miles from the nearest coastline.

Following the interaction between the Turkish fishing vessels and the Italian Coast Guard authorities at sea, and recognizing the need to address the matter through proper diplomatic channels, the relevant information was promptly transmitted to the Embassy of the Republic of Türkiye in Rome via our Ministry of Foreign Affairs on 21 May 2026.

Following the inspections by the Italian Coast Guard and while awaiting a response from the Italian authorities, and in light of the continuing unce11ainty regarding the scope and application of the area declared by Italy as its EEZ, the Turkish fishing vessels present in the area refrained from conducting any fishing activities and remained on standby. Since the diplomatic demarches had not yielded any tangible outcome at that stage, the vessels concerned subsequently left the area and proceeded beyond the region claimed by Italy.

The fact that the Italian Coast Guard authorities issued warnings to the Turkish fishing vessels based on varying distances made it difficult for the Turkish vessels to clearly and unequivocally discern the exact boundaries of the EEZ declared by Italy in nautical miles. Indeed, the communication of disparate distances in the warnings issued by the relevant authorities resulted in ambiguity regarding the actual geographical scope of the maritime area in question.

Following the commencement of the warnings issued by the Italian authorities on the ground, the matter was promptly taken up for consideration by the Turkish authorities and the necessary diplomatic demarches were initiated with the Italian authorities through the Ministry of Foreign Affairs of the Republic of Türkiye and the Embassy of the Republic of Türkiye in Rome. In this context, consultations were held with the Italian authorities on 23 May 2026, and the matter was formally conveyed to the Italian side by means of a Note Verbale on 24 May 2026.

Therefore, while the process was ongoing, our authorities did not rely solely on the statements of our fishers. Furthermore, upon examination, it was understood that the decree concerning the EEZ declared by Italy (Decree of the President of the Republic No. 193 of 26 September 2025, whose provisions and geographical coordinates concerning the EEZ were officially communicated by the United actions on 26 January 2026.) contained political references. Consequently, in order to clarify the EEZ area declared by Italy and to objectively and technically establish the geographical coordinates of the area where the Turkish fishing vessels were operating, the logbook records, VMS/ITD records, and eBCD data regarding the location of the activities were submitted to the National Mapping Agency of the Ministry of National Defense of the Republic of Türkiye. The positional data concerning the activities was officially examined by the said institution.

Accordingly, the findings of the official examination conducted by the National Mapping Agency regarding the positional data of the Turkish fishing vessels alleged to have engaged in IUU activities in the area declared by Italy, -covering the dates when the warnings commenced, fishing and transfer operations took place, and the subsequent inspection was carried out by the Italian Coast Guard- have also been shared with the EU side.

Existing records confirm that the Turkish fishing vessels were operating in prox1m1ty to the boundary of the EEZ declared by Italy, yet at no stage entered its 12-nautical-mile territorial sea.

Following the clarification of the position of the Italian authorities, Türkiye adopted a constructive approach and made use of the available diplomatic and institutional channels, while maintaining its contacts with the relevant authorities with a view to addressing the matter.

Türkiye places great emphasis on constructive inter-agency cooperation and on handling the technical and geographical parameters of such events through objective, verifiable, and exchangeable data. During this process, Türkiye worked with the EU in a spirit of transparency and cooperation.

A detailed report on the matter was submitted to the EU, followed by bilateral meetings conducted with the EU.

During the first meeting held on 09 October 2026, the report submitted to the EU was discussed, and it was agreed to conduct additional technical work to clarify the positions of the vessels. To this end, the EU requested an image (screenshot) showing the VMS/AJS tracks from 19/05 to 25/05, including vessel identification, dates, times and speeds, together with boundaries of the Italian EEZ (defined as extending 200 nautical miles from the coast), as well as a table of geographical coordinates containing the corresponding data.

The requested data were duly conveyed to the EU, and a second bilateral meeting was subsequently held.

At the meeting held on 15 October 2026, the data submitted by Türkiye were jointly examined by both sides at the EU's request. Following this joint assessment, both sides acknowledged that Turkish fishing vessels had operated in the area concerned without being aware of Italy's declaration of an EEZ and without any intention of engaging in IUU fishing activities.

In light of this understanding, consultations with the EU have been held with a view to identifying and implementing the necessary steps, in accordance with Türkiye's responsibilities as a flag State and taking effective action under the relevant ICCAT Recommendation, namely *Recommendation by ICCAT Amending Recommendation 21-13 on Establishing a List of Vessels Presumed to Have Carried Out ilegal. Unreported and Unregulated Fishing Activities* (Rec. 23-16).

All relevant information and documentation concerning these operations are available in the records of our Ministry, including duly validated logbooks, the ITDs duly signed by the vessel representatives and validated by the ROP, video footages of transfer operation conducted following the fishing operation, and duly validated eBCD records. Accordingly, the allegation that the transfers were conducted without video recordings is not supported by Türkiye's official records or the findings of the relevant reviews. The activities in question were carried out under the applicable monitoring and verification mechanisms and were duly recorded.

Türkiye has shared with the EU all relevant original documents, records and data relating to the activities in question.

The activities in question were neither conducted outside the ICCAT system nor left unreported or concealed. The activities of the Turkish fishing vessels were carried out within the framework of the "2026 Annual Fishing Plan" submitted by Türkiye to ICCAT and were subject to the relevant Commission processes. The fact that all records and documentation relating to the fishing and transfer activities are available within the relevant monitoring and verification systems further suppo11s this position.

To conclude, *in this context, particular attention should be given to the sequence of events. Italy proclaimed its Exclusive Economic Zone (EEZ) on 3 January 2026, whose provisions and geographical coordinates concerning the EEZ were officially communicated by the United Nations on 26 January 2026. Subsequently, at its meeting of 3-5 March 2026, the ICCAT Commission adopted Türkiye's "2026 Bluefin Tuna Fishing, Farming, Inspection and Capacity Management Plan", covering fishing activities in FAO area 37.2, which appears to include the area affected by the Italian EEZ proclamation.*

During the discussions with the EU, the EU's statement that communication could have been improved was duly noted in response to Türkiye's concern that the EU had raised no objections at the time Türkiye submitted its bluefin tuna management plan.

Following the examination conducted, it has been established that the Turkish fishing vessels entered the area to carry out planned fishing activities approved within the ICCAT framework. became aware of Italy's EEZ declaration only during the operation.

Owing to the inconsistent distances indicated in the warnings issued by the Italian Coast Guard. the precise extent of the EEZ declared by Italy could not be clearly determined by the Turkish side. Following these warnings. Türkiye promptly initiated consultations through diplomatic and institutional channels to clarify the situation. However, as the matter remained unresolved, Turkish fishing vessels began leaving the area on 23 May 2026.

Following the discussions held with the EU and upon consideration of all relevant circumstances and data as a whole, it has been established that Turkish fishers conducted activities in the area concerned without being aware of Italy's declaration of an EEZ and without any intention of engaging in IUU fishing activities.

Türkiye reaffirms its full commitment to ICCAT's bluefin tuna management measures and its obligations regarding the prevention of IVU fishing. The activities in question were conducted within the framework of the plan submitted by Türkiye to ICCAT and endorsed during the 2026 Panel 2 process. The fishing and transfer operations were fully documented through the ICCAT Regional Observer Programme (ROP) records, ICCAT Transfer Declarations (ITDs), electronic Bluefin Tuna Catch Documentation (eBCD) system, and transfer video footage.

EFFECTIVE ACTION TAKEN BY TURKIYE

It should be reiterated that there appears to be no evident incentive for Turkish-flagged vessels to deliberately violate ICCAT rules and engage in IVU fishing under the circumstances at hand.

Following a joint assessment of the data, Türkiye and the EU acknowledged that Turkish fishing vessels had operated in the area concerned without being aware of Italy's declaration of an EEZ and without any intention of engaging in IUU fishing activities.

In light of this understanding, consultations with the EU have been held with a view to identifying and implementing the necessary steps in accordance with Türkiye's responsibilities as flag State and taking effective action under the relevant ICCAT Recommendations.

As a result of consultations with the EU, Türkiye, in its capacity as the flag State, has committed to releasing back into the sea 148,328 kg of bluefin tuna subject to the IUU listing proposal, the quantity of which has been verified through the relevant documentation and which is currently held in farm cages. The release operation will be carried out in accordance with Annex 1O of ICCAT Recommendation 25-04, under the supervision of the Regional Observer Programme (ROP). Türkiye considers that this action would constitute an effective measure under paragraph 6(b)(iii) of ICCAT Recommendation 23-16.

As of the date of submission of this letter to the Secretariat (28 October 2026), Türkiye has issued the necessary instructions for the release operation to take place on 5 November 2026, before harvesting activities commence at the farm.

Türkiye will submit a report on the release operation, together with the relevant supporting documentation, to the ICCAT Secretariat following its completion.

Türkiye also acknowledges the need to take the necessary measures in accordance with its obligations under the relevant ICCAT Recommendations and to implement appropriate follow-up and preventive actions, taking into account the specific circumstances of this incident, with a view to preventing a similar situation from recurring in the future.

It should be underscored once again that, not limited to the activities in question, all bluefin tuna fishing activities conducted by Türkiye are carried out in full accordance with the relevant ICCAT control, monitoring, and reporting mechanisms.

Türkiye maintains a zero-tolerance approach to IUU fishing and remains fully committed to fulfilling its obligations under ICCAT and other relevant regional fisheries management organizations.

Bluefin tuna fishing activities are likewise subject to an effective monitoring and control, in full accordance with the applicable ICCAT rules.

Türkiye has actively and continuously participated in joint fisheries control and inspection activities carried out with the EU and the European Fisheries Control Agency (EFCA) including through the deployment of Turkish inspectors to EFCA operations in 2025 and 2026. Türkiye remains committed to further strengthening and continuing this cooperation in the future.

Türkiye would like to underline that, it is also a reality that the change in the applicable maritime jurisdiction framework following the agreement and allocation of the relevant ICCAT fishing opportunities has entailed certain consequences for our country regarding previously agreed fishing activities.

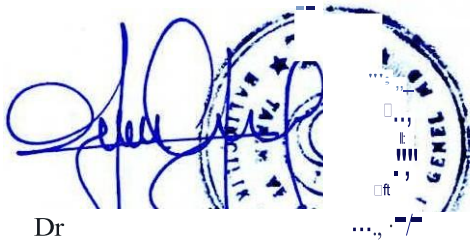
Furthermore, consideration could be given, as appropriate, to establishing a fair and orderly transition mechanism where changes to maritime jurisdictional arrangements may have economic implications for the planned activities of other States in areas where fishing activities were previously conducted.

ln order to prevent similar situations from arising in the future Türkiye considers that enhanced information-sharing and communication among ICCAT CPCs, including on developments concerning maritime jurisdictional arrangements, during the submission and review of fishing plans would be beneficial.

Türkiye wishes to express its gratitude to the EU for its constructive cooperation throughout this process.

Türkiye submits to the attention of the Commission that, it has taken the necessary measures as a flag State for the questioned Turkish vessels included in the draft ICCAT IUU List and expects that, in light of effective action taken, the matter will be concluded with the removal of the Turkish vessels concerned from the Draft ICCAT IUU List.

Please accept the assurances of my highest consideration.



Dr

Deputy Director-General
Head Delegate of ICCAT to Türkiye

EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES
International Ocean Governance and Sustainable Fisheries
Regional Fisheries Management Organisations

Brussels
MARE.B.2/AD

MANEL Camille
ICCAT Executive Secretary

Subject: Follow-up to the EU communication in relation to paragraph 2 of Recommendation 23-16[1]

Dear Mr Manel,

As referred to in ICCAT Circular #07575/2026, on 7 September 2026 the European Union (EU) submitted information for the inclusion of four vessels in the Draft IUU Vessel List in accordance with paragraph 2 of Recommendation 23-16.

Three of the four vessels concerned are Turkish-flagged vessels. These vessels are included in the above-mentioned submission on the basis of inspection findings from EU-Italian patrol vessels from 21 May 2026 that indicate that:

- These vessels conducted fishing activities in the EU-Italian Exclusive Economic Zone (EEZ) without the relevant fishing authorisation from EU authorities since 19 May 2026;

- Transfer operations were carried out in the EU-Italian EEZ, but the required control video was not on board the fishing vessel;

- There are discrepancies in geographical coordinates reported between the ICCAT transfer declaration, the AIS data and FRONTEX aerial sightings.

Türkiye and the EU engaged in a constructive dialogue to assess and discuss these findings.

In the course of this dialogue, it was established beyond doubt that the three Turkish-flagged vessels concerned had indeed carried out fishing activities in the EU-Italian EEZ without the requisite authorisation from competent EU authorities. The EU-Italian EEZ was duly established in accordance with applicable procedures in this regard and fishers active in this region are therefore expected to know or be informed by their flag state of the status of the waters they operate in and the delineation of the maritime boundaries as deposited with the Secretary-General of the United Nations. A declared lack of awareness of the EEZ status cannot be accepted as a justification for the activities undertaken, nor does the question of intent obviate the need for appropriate follow-up action where IUU fishing has occurred.

For the EU, it is of utmost importance, and a matter of principle, that no benefit should be derived from illegal fishing activities; accordingly, fish caught illegal should not be commercialised. The EU received confirmation from Türkiye that it ordered the release of the fish caught illegally.

Furthermore, Türkiye committed to taking additional actions such as closer monitoring and consistent control of the vessels in question. And the release order is without prejudice to the flag state imposing sanctions proportionate to the severity of the infringement.

[1] Due to data confidentiality issues port inspection reports and related information are accessible only in ICCAT Circular #09839/2026

The EU considers that with the release of the illegally caught fish and subsequent modification of the eBCD, the flag State has taken appropriate follow-up measures to protect the integrity of the market. In that context, and notwithstanding the ongoing administrative proceedings in the coastal state to follow up on the infringements documented in the inspection reports, the EU can agree to withdraw the three Turkish-flagged vessels from the information it submitted in relation to the inclusion of vessels in the Draft IUU Vessel List.

Yours sincerely,

Stijn BILLIET
Head of Unit

Supplementary report on the situation of the Tunisian vessel *Dina Amir* following ICCAT inspection No. 7861 of 5 August 2026

I. Background

Following receipt of ICCAT inspection report No. 7861, issued on 5 August 2026 concerning the Tunisian vessel DINA AMIR, the Tunisian authorities submitted an initial response setting out the available information and the steps taken by the relevant authorities.

In order to supplement the information provided, the General Directorate of Fisheries and Aquaculture undertook further investigations, in coordination with the relevant regional services and administrative bodies. These investigations focused in particular on the vessel's history, its administrative status, the circumstances surrounding the non-compliances identified during the inspection, and the measures taken by the Tunisian authorities.

This report sets out all these details, provides the necessary clarification on Tunisia's position and the measures taken by the national authorities, and also aims to address the various observations and queries raised by the European Union following its review of the inspection report.

II. History and administrative status of the vessel

The verifications carried out have made it possible to trace the vessel's administrative history. It appears that the vessel, previously operated under the name DINA AMIR I, registered as MO 1333, was found to have committed an infringement in 2025 during an inspection carried out by the GFCM. This vessel was subsequently struck off the register of vessels with a view to building a new vessel under the name DINA AMIR.

The latter currently holds a provisional registration number, MO/S/1494, pending the completion of the administrative formalities for regularization. This registration enables the vessel to be identified by the national authorities and confirms that the administration is processing its application. It is important to note, however, that this does not constitute a fishing licence. In fact, the vessel does not hold any fishing authorisation, not even a provisional one.

Investigations have also revealed continuity in the operational record between DINA AMIR I and DINA AMIR. As such, the infringements identified in 2025 and 2026 form part of this same continuity of operations and must be taken into account when reviewing the vessel's history.

As regards the absence of DINA AMIR from the ICCAT and GFCM registers of authorised vessels, this must be viewed in the context of its current administrative status. Indeed, the removal of the former registration number MO 1333, followed by the allocation of a provisional registration number MO/S/1494 to the vessel built to carry on the same activity, created a transitional administrative status. The change in name and registration number, as part of the regularisation procedure therefore explains the discrepancy between its provisional identification at national level and its entry in the international registers.

However, this situation does not exempt the vessel from complying with the conditions required for its registration in the registers of authorised vessels and for carrying out any fishing activities. The lack of a fishing authorisation, as well as the documentary irregularities observed, were noted by the competent authorities and have been recorded in a report of offence hereto attached.

III. Catches of albacore recorded during the inspection

The inspection report notes a significant proportion of albacore in the catches retained on board the vessel, accounting for approximately 97 per cent of the catches declared at the time of the inspection.

This situation was examined in the light of the provisions of ICCAT Recommendation 24-08, in particular those relating to CPCs without a Mediterranean quota for albacore and to the limits applicable to bycatches in the fisheries concerned.

It should be noted that Tunisian regulations do not prohibit the landing of albacore. However, the absence of a quota allocated to Tunisia in the Mediterranean means that the restrictions laid down by ICCAT measures must be complied with, particularly regarding bycatches.

During his hearing, the master stated that he was not fully aware of the restrictions applicable to albacore under ICCAT measures and that he had confused this species with small tunas. This explanation was taken into account when examining the circumstances of the incident, without calling into question the master's obligations regarding compliance with the applicable regulations.

Above all, it is important to emphasize that the Tunisian authorities did not confine themselves to simply taking the master's account. Following the findings, the vessel DINA AMIR and its equipment were confiscated. Furthermore, no administrative services are currently being provided to the vessel or its master.

The official report confirming the confiscation of the vessel and its equipment is attached as an annex to this report.

IV. Absence of a VMS system on board

The inspection also noted the absence of a VMS system installed on board the vessel, contrary to the requirements set out in ICCAT Recommendation 18-10.

The verifications carried out confirmed that the system had indeed not been installed. This situation is due to the fact that the vessel's administrative documentation was still being finalised. It is therefore not simply a matter of reporting date, but rather the absence of the equipment on board.

This non-compliance was noted by the competent authorities and resulted in a report of infringement being issued. The Tunisian authorities consider that the installation of the VMS device is an essential condition for compliance of the vessel with the applicable monitoring and control requirements.

V. Absence of a fishing logbook on board

The absence of a fishing logbook was also noted during the inspection.

In this regard, it should be noted that data relating to catches and landings are collected at national level by certified fisheries enforcement officers. This procedure provides the authorities with the information required to monitor landings. However, it does not replace the master's obligation to keep a fishing logbook on board and to record the operations carried out therein.

This obligation arises, in particular, from the provisions of ICCAT Recommendation 03-13 and from the requirements of Tunisia's Mediterranean swordfish fishing plan.

The absence of this document therefore constitutes a separate non-compliance which calls for appropriate regulatory action. The relevant authorities must ensure that this requirement is effectively complied with by the masters of the vessels concerned.

VI. Measures taken by the Tunisian authorities

As soon as it received the information relating to the inspection, the DGPA referred the matter to the relevant departments in order to verify the reported facts and determine what action should be taken.

Further investigations made it possible, in particular, to obtain the master's account, to trace the vessel's administrative history and to confirm several non-compliances relating to its documentation status and the absence of the VMS system.

Following these verifications, the following measures were taken:

- Issue of reports of offences relating to the vessel's administrative and documentation status, as well as the absence of the VMS system;
- The confiscation of the vessel DINA AMIR and its equipment, in accordance with the measures taken by the competent authorities;
- Even before any infringement is established, no administrative services will be provided to the vessel or its master until the official documents have been obtained and the VMS system installed;
- The continued examination of its administrative status, in particular with regard to the formalities for regularization of its status and the regulatory conditions necessary for any fishing activity.

The official report certifying the confiscation of the vessel and its equipment is attached as an annex as proof.

These measures demonstrate that the Tunisian authorities are effectively addressing the matter and are committed to taking the necessary action in response to the non-compliances identified.

VII. Main observations made by the European Union

The observations made by the European Union following its review of the inspection report relate primarily to the following points:

1. Administrative status of the vessel: its absence from the ICCAT and GFCM registers of authorised vessels, the absence of a fishing authorisation on board, and the request for presentation of registration and authorisation documents. The European Union also raised the issue of the link with the case of the DINA AMIR I, which was inspected in 2025.

2. Albacore catches: the significant proportion of this species in the catches and compliance with the limits applicable to CPCs without a Mediterranean quota, in accordance with ICCAT Recommendation 24-08.

3. VMS system: the absence of VMS equipment on board and the vessel's compliance with the requirements set out in ICCAT Recommendation 18-10.

4. Fishing logbook: the absence of this document on board and the national procedures for reporting catches, with particular regard to ICCAT Recommendation 03-13 and Tunisia's Mediterranean swordfish fishing plan.

The information set out in the various sections of this report provides the requested clarifications and details the verifications and measures undertaken by the Tunisian authorities.

VIII. General assessment, Tunisia's position and request for removal from the IUU list

Tunisia attaches particular importance to compliance with the conservation and management measures adopted by ICCAT and ensures that the activities of vessels flying its flag are monitored.

In the case of the DINA AMIR, further investigations have clarified its history and administrative status, as well as the circumstances surrounding the non-compliances identified during the inspection. They have also clarified the transitional conditions relating to its provisional registration MO/S/1494 and the discrepancy noted with international registers.

The Tunisian authorities have taken this matter seriously and taken the necessary measures to address it, including the issue of reports of infringements, the confiscation of the vessel and its equipment, and the suspension of all administrative services to the vessel and its master. These measures demonstrate Tunisia's commitment to taking concrete action in response to the irregularities identified and to preventing their recurrence.

In light of the clarifications provided, the investigations carried out and the measures taken by the national authorities, Tunisia considers that these factors must be taken into account in the review of this case.

Consequently, Tunisia requests a review of the situation regarding the vessel DINA AMIR and calls for its removal from the ICCAT list of vessels engaged in illegal, unreported and unregulated (IUU) fishing, in light of the additional information provided and the measures effectively taken by the Tunisian authorities.

Finally, Tunisia reaffirms its commitment to continue addressing this matter in accordance with its national regulations and ICCAT measures, and to strengthen the control and monitoring mechanisms for vessels flying its flag.

IX. Supporting documents attached

- Reports on the administrative and documentary status of the vessel in 2025 and 2026;
- Report on the absence of the VMS system;
- Official report confirming the confiscation of the vessel DINA AMIR and its equipment.