

RESPONSES FROM CPCs REGARDING PEW SUBMISSIONS ON TRANSHIPMENT UNDER REC. 08-09:

1. CHINA

First of all, we would like to express our gratitude for PEW for their attention on this matter.

Secondly, after carefully cross-checked the transshipment data in our database, the data summarized by PEW and the data in ICCAT Biennial Period reports (2016-2017 Part II, Volume 4), we wish to make the following explanation and clarifications for the transshipment data for Chinese fishing vessels (LSPLVs), especially the data in the table 1 in PEW's summary of the Review.

In our view, there are two general principles:

Principle 1: China submitted the transshipment data in the form of CP37, however, it seems that different CPCs have different understandings on how to fill in this form, in China's case, we aggregated transshipment data vessel by vessel and this is reflected through the vessel's ICCAT vessel number appeared in the first column of CP37, and the second column of CP 37 is all the species that the same vessel transhipped during the whole year of 2016, maybe the same vessel conduct several transshipments during the year, but we will summarize transshipment data species by species for the same vessel and aggregate them, the fourth column is the corresponding weight for each species to the same vessel, each specific line for each species, including its weight, to the same vessel, this is the reason why there are many lines for the same vessel (namely same ICCAT vessel number).

Principle 2: the period we reported transshipment data is strictly from 1 January 2016 to 31 December 2016, that means as long as certain transshipment happened in the year of 2016 we will include this transshipment data into the statistics of 2016.

So keep these two principles in mind, I wish to advise the following:

1, regarding the "Quantities transhipped(t)" :

On the left part of Table 1, namely Reported by CPCs, the Quantities transhipped is 4764 (t), and then changed to 4323 (metric ton) in PEW's reply letter to Japan which published on 26th Meeting document webpage on 31 October. I wish to say that the data 4323 is the data China submitted at that time. However, after checking carefully again our transshipment database and all the transshipment declaration reports, we are sorry to say that we indeed omitted few transshipment data, after adding all the omitted data, the total quantities transhipped for the whole year of 2016 is 6086.925 metric ton, which basically corresponding to the number reported by the ROP.

2, regarding the "Transshipments events":

On the left part of Table 1, namely Reported by CPCs, the transshipment events is 132, after careful analysis I understood this number is counted because there were 132 lines under the name of China in ICCAT Biennial Period reports (2016-2017 Part II, Volume 4), obviously, this method is not correct, as I said above principle 1, we aggregated transshipment data vessel by vessel, if you look at China's transshipment data in ICCAT Biennial Period reports (2016-2017 Part II, Volume 4), you will found there are many specific lines which showing the some one vessel through ICCAT vessel number, the reason we filled in so many lines for same one vessel is because the same vessel transhipped various species and it is our intent to submit all the transhipped species. So, it is not correct to calculate transshipment events just simple count how many lines they have in the report. For the year of 2016, our database showed that the transshipment events is 105.

On the right part of table 1, namely Report on the implementation of the ROP, it is said that the transshipment events for China for the year of 2016 is 177, to be honest, I did not know why there exist so huge different between the two statistics and how this number (177) was calculated?

3, regarding the "Vessels that transhipped":

On the left part of Table 1, namely Reported by CPCs, the number of Vessels that transhipped is 32, this number is correct, it also can be proved from the transshipment information appeared in ICCAT Biennial Period reports (2016-2017 Part II, Volume 4), of course, you need to pay attention to the many lines which belong to same vessel. On the left part, namely Report on the implementation of the ROP, it is said that the number of Vessels that Transhipped is 97, again, I did not know how is this vessel number was calculated? as the total active fishing number for the year of 2016 of China is just 32.

To conclusion, the correct transshipment data for China for the year of 2016 should be :

Quantities transhipped: 6086.925

Transshipment events: 105

Vessels that transhipped: 32

Regarding the report of GFW, we understood that both the "encounter" and "loiter" were analysed based on the data of AIS, please take note that all the Chinese fishing vessels must be installed a functional VMS equipment for tracking their positions, however, AIS data is not recognized as legally-binding data for tracking vessel positions since the primary purpose of AIS is for vessel and crew safety.

We hope the above explanation and clarification could make things clear. Thanks again both for PEW and the Secretariat for their efforts on this matter.

2. Results of Chinese Taipei's Investigation on the Report of PEW Regarding At-sea Transshipment

With PEW's report circulated on July 26, 2019, as well as other relevant information provided thereafter, the results of Chinese Taipei's investigation are as follows.

1. Significant discrepancies in reporting of transshipment between ROP and CPCs:

Based on the correspondences among PEW, Japan, and the Secretariat, it is clarified that the different methods applied by CPCs when submitting their annual reports on transshipments led to the misunderstanding of PEW.

For Chinese Taipei, we apply the same method as Japan. In other words, if a vessel transships multiple times, related data, such as the quantities transshipped and the transshipment events, are aggregated in our annual report on transshipments.

According to our own database, in 2016, there were 52 vessels that transshipped at sea for a total of 251 times. To find out the cause of the differences, we have asked the Secretariat to provide us the ROP database so as to cross-check.

After receiving the further revised data from the ROP, it was found that the number of vessels that transshipped matched, i.e. 52 vessels. Nonetheless, the count of transshipment events reported by the ROP was 252 times. We cross-checked both databases thoroughly and found out that the ROP had mistyped the year for one transshipment event, which took place in 2015, as 2016. With such technical error being eliminated, the figures reported by Chinese Taipei as well as the ROP match with each other. That is to say, the number of our vessels transshipped at sea in 2016 is 52, and the count of the transshipment event is 251 times.

Regarding the quantities transshipped, after PEW used the metric tons as the measurement unit, the amount of fish that our vessels transshipped was modified to 12,746 metric tons, which is very close to the estimates provided by the ROP (12,811).

Therefore, in the case of Chinese Taipei, the table originally provided in PEW's report is revised as the following in accordance with the corrections mentioned

above:

Table 1: Chinese Taipei's transshipment data corrected

	Reported by Chinese Taipei			Reported on the implementation of the ROP		
	Quantities transshipped (metric tons)	Transshipment events	Vessels that transshipped	Quantities transshipped (metric tons)	Transshipment events	Vessels that transshipped
Before corrections	14,047	52	52	12,811	384	58
After corrections	<u>12,746</u>	<u>251</u>	<u>52</u>	12,811	<u>251</u>	<u>52</u>

As shown in the table above, the figures reported by Chinese Taipei almost correspond with those reported by the ROP after corrections. We believe that it is just some technical errors when ROP imports the data as well as the misinterpretation of the data submitted by CPCs that result in the discrepancy. With the effort exerted by PEW, the Secretariat and relevant CPCs, misunderstandings are clarified, and it once again demonstrates that the ROP scheme is functioning very well, under which the at-sea transshipment is strictly monitored.

2. Analysis of 2017 reported transshipment activities in the ICCAT area by using AIS data

PEW and Global Fishing Watch (GFW) used the AIS data to analyze movements of carrier vessels in the Atlantic Ocean, and assumed that 77 carrier vessels transshipped at sea without reporting to the ICCAT ROP to have an observer onboard.

In the raw data provided by PEW, 3 carrier vessels flagged to Chinese Taipei are alleged to be loitering in the Atlantic Ocean. Those 3 vessels were duly authorized by fisheries authority to conduct transshipment activities in 2017. Within the period indicated by PEW/GFW, those vessels were in the south-western Atlantic Ocean waiting to transship squid catch. Each transshipment of the squid catch had been approved beforehand by the fisheries authority pursuant to our domestic regulations, and transshipment declarations were submitted to the government accordingly.

3. Conclusions

Despite PEW's misunderstanding, its report provides an opportunity for relevant CPCs and the ROP to review their own databases so as to find out possible technical errors. As the Secretariat, Japan, and Chinese Taipei conducted investigations respectively, doubts or allegations, whether on the discrepancies between the numbers or the likely unmonitored at-sea transshipments, have been gradually dispelled. On this note, we would like to align ourselves with Japan to ask other related CPCs to look into its case and provide the findings as well.