Original: English/French

INFORMATION RECEIVED UNDER REC. 08-09

The recommendation by ICCAT to Establish a Process for the Review and Reporting of Compliance Information [Rec. 08-09] provides that non-governmental organizations may submit reports on non-compliance with ICCAT conservation and management measures to the Secretariat at least 120 days before the annual meeting.

Information within the deadline has been presented by PEW (in association with Global Fishing Watch) and from the Environmental Justice Foundation (EJF). The Chair of the Compliance Committee have agreed that these can be accommodated on the 2021 Agenda.

This document comprises the following:

A. Information submitted by PEW in association with Global Fish Watch. Previously submitted as an information document to the 2020 Commission process and published as COC-317/2020.

   A1. **Appendix 1**. Executive Summary: Comparative Analysis of AIS Data with the International Commission for the Conservation of Atlantic Tunas Reported Transshipment Activity in 2019.

   A2. **Annex 1**. Comparative Analysis of AIS Data with the International Commission for the Conservation of Atlantic Tunas Reported Transshipment Activity in 2019: Full report in original language (English) only.

B. Vessel Information Alert submitted by EJF. Sent to CPCs involved 24 June 2021. Please note that this contains updated information on alerts previously submitted by EJF in 2020.

   B1. **Appendix 2**. Letter from EJF: Summary note on information shared with ICCAT in 2020 and 2021

   B2. **Annex 2.** Vessels having potentially engaged in illegal fishing in the Atlantic Ocean listed on the record of currently authorised vessels of the Indian Ocean Tuna Commission: Full report in original language (English) only. Submitted in 2020

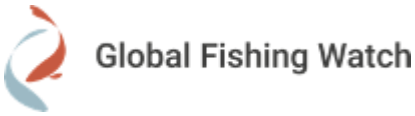
   B3. **Appendix 3.** Update: Potential illegal fishing activities in the area under the competence of ICCAT

   B4. **Appendix 4.** Vessels having potentially engaged in illegal fishing in the Atlantic Ocean listed on the record of currently authorised vessels of the Indian Ocean Tuna Commission (2021) Full report in original language (English) only. Previously sent to CPCs mentioned therein. [Note: see also PWG-405/2021 submission by EU for inclusion of 3 vessels on IUU list].

   B5. **Appendix 5.** Response from Senegal to information submitted by EJF.

   B6. **Appendix 6.** Response from Belize to information submitted by EJF.

Appendix 1



A Comparative Analysis of AIS Data with the International Commission for the Conservation of Atlantic Tunas Reported Transshipment Activity in 2019

Acknowledgements

This report was funded in part by the Gordon and Betty Moore Foundation and produced in cooperation with The Pew Charitable Trusts ("Pew"). The authors would like to thank Mark Young, Executive Director of the International Monitoring, Control, and Surveillance (IMCS) Network, Adriana Fabra, and Claire van der Geest for reviewing this study.

Prepared by: Global Fishing Watch

Executive Summary

Transshipment in waters of the International Commission for the Conservation of Atlantic Tunas (hereinafter referred to as the "ICCAT Convention Area") is currently regulated by the Recommendation 16-15, *Recommendation by ICCAT on Transhipment*. The Recommendation includes reporting requirements for both fishing and carrier vessels to help deter Illegal, Unreported, and Unregulated (IUU) fishing activities and better manage the fishery. Additionally, this Recommendation requires that all carriers transshipping ICCAT-managed species are authorized by ICCAT and must carry an ICCAT observer from the Regional Observer Programme (ROP) at all times. The Recommendation acknowledges the need for greater monitoring, control and surveillance (MCS) of vessel activity and transshipments due to '*…grave concern that… a significant amount of catches by IUU fishing vessels have been transshipped under the names of duly licensed fishing vessels…*'.

In 2019, Global Fishing Watch (GFW) submitted a report to the 26th Regular Meeting of the Commission that used commercially available Automatic Identification System (AIS) data to analyze the track histories of carriers operating within the ICCAT Convention Area during the calendar year 2017. In 2020, a follow up analysis of data covering the calendar year of 2018 was completed and the resulting report was submitted during the ICCAT Compliance Committee[1]. This year, GFW analyzed 2019 trends in potential transshipments and port visits over time by fleet, and provided an enhanced comparison of AIS activity with ROP data.

The ICCAT Regional Observer Programme (ROP) for carriers is one of the most transparent observer programs amongst the tuna RFMOs. Included in the ROP observer reports are geolocations and dates of each observed at-sea transshipment conducted by carriers and longliners within the Convention Area. This level of transparency of at sea transshipment activities allows members to conduct due diligence and validate that reported information on their flagged vessels is consistent with what is reported by the ROP. However, even with the high levels of transparency, there were still discrepancies between the ROP Observer Reports (ICCAT Observer Report 2018, ICCAT Observer Report 2019, and ICCAT Observer Report 2020) and the ICCAT ROP summary documents (Doc. No. PWG 402/2019 and Doc. No. PWG 402/2020-rev). The ROP could be further improved by the standardization of reporting requirements and by requesting additional metadata in the submitted reports which would clarify details on when and where transshipments are being observed, thus reducing the likelihood of ambiguities between the ROP observer reports and the ICCAT ROP summary documents.

Activity was detected by AIS that was not reported to the ICCAT ROP. 61 loitering events were detected that were not reported on ROP deployments, 21 of these events by non-CPC Carrier vessels. In addition, not all ports visited by carriers after encounters with longliners were located within ICCAT member States, meaning they were not designated as ports of entry under the ICCAT Port State Measures Recommendation 18-09.
This potential unobserved activity at-sea and unmonitored activity in-port increases the risk of non-compliance with ICCAT transshipment management measures. ICCAT should consider the following recommendations to improve the Recommendation on Transhipment, and further reduce the risk of IUU fishing activities within the Convention Area.

[1] The 2020 ICCAT Commission meeting was canceled due to the COVID-19 pandemic, but some Commission business - including the Compliance Committee - occurred by correspondence.

Finding	Recommendations for ICCAT
AIS data captured trends reported by ICCAT ROP and captured additional information on transshipment hotspots in overlapping RFMOs	Implement a centralized VMS to ensure ability to audit and validate reported information provided by CPCs. In the absence of a centralized VMS program, use AIS as a supplemental tool to help monitor implementation of the ROP and validate transshipment activity. AIS use could be implemented through a CMM that encourages members to mandate AIS use for distant water vessels and have minimum standards on the implementation of SOLAS Chapter V Regulation 19[2].
ICCAT has one of the most transparent carrier vessel ROPs of all tuna RFMOs, though reported information can be inconsistent. 61 loitering events were detected that were not reported on ROP deployments, 21 of these events by non-CPC Carrier vessels	Standardize the amount and type of information required from the ROP to a detailed spatial and temporal resolution, and ensure consistency in reported information and metadata. The Secretariat and Member States are encouraged to investigate potential transshipment activity which was not reported on by the ROP. Amend the CMM to only permit transshipment by carriers flagged to CPCs.
All port visits after encounters were to Porto Grande, Cape Verde, and Cape Town, South Africa. However, seven port States were visited after loitering events that were not designated ports by ICCAT 15 non-ROP detected loitering events occurred prior to eight visits to five non-designated ports	Ensure compliance with General Recommendation 18-09 on Port State Measures requiring use of ICCAT designated ports by carriers when carrying transshipped catch that originated in the ICCAT Convention Area. Encourage port authorities in non-CPC port States to share landing declarations at ports used by carriers when landing ICCAT caught species. Require the next port of entry to be identified after transshipments.

[2] https://www.liscr.com/sites/default/files/SOLAS%20V_Reg19.pdf

Global Fishing Watch

A Comparative Analysis of AIS Data with the International Commission for the Conservation of Atlantic Tunas Reported Transshipment Activity in 2018

Acknowledgements

This report was funded in part by the Gordon and Betty Moore Foundation and produced in cooperation with The Pew Charitable Trusts (“Pew”). The authors would like to thank Mark Young, Executive Director of the International Monitoring, Control, and Surveillance (IMCS) Network, and Claire van der Geest for reviewing this study.

Prepared by: Global Fishing Watch

2018 AIS-Detected Transshipment Activity in the International Commission for the Conservation of Atlantic Tunas Convention Area

Transshipment of catch at-sea is a major part of the global fishing industry, particularly the tuna sector. However, existing monitoring and regulatory controls over transshipment at-sea are widely considered insufficient, with no guarantee that all transfers are being reported or observed in accordance with Regional Fisheries Management Organizations (RFMOs) Conservation and Management Measures (CMMs). Ineffective and/or incomplete monitoring, control and surveillance (MCS) of at-sea transshipment creates opportunities for illegally caught seafood to enter the supply chain, and may perpetuate human rights abuses aboard vessels and provide an enabling environment for other illicit activities.

To help increase the transparency and understanding of at-sea transhipment activities, Global Fishing Watch (GFW), in partnership with The Pew Charitable Trusts (Pew), is undertaking an assessment of at-sea transshipment activities occurring inside the Convention Areas of the five global tuna RFMOs. Together, GFW and Pew have also launched the Carrier Vessel Portal (CVP). The first of its kind, the CVP is a publicly facing tool focused on at-sea transshipment, that seeks to provide policymakers, authorities, fleet operators, and other fisheries stakeholders information on when and where at-sea transhipment activities are taking place. The CVP uses commercially available satellite Automatic Identification System (AIS) data, combined with machine learning technology and publicly available information provided by RFMO's, including registry data to identify and display information on potential transshipment activity.

Utilising the CVP, Pew and GFW are producing a series of annual reports that compare at-sea transshipment-related activities observable through AIS data with publicly available information generated from RFMO member implementation of the relevant at-sea transhipment CMM. These reports are designed to be RFMO-specific and cover calendar years 2017 through 2019.

These reports assess the activity of carrier vessels and provide indication of possible transshipment events by comparing AIS data of vessels and determining possible "encounters" and "loitering" events. 'Encounter Events' are identified when AIS data indicates that two vessels may have conducted a transshipment, based on the distance between the two vessels, duration the vessels operated in close proximity, and vessel speeds. 'Loitering Events' are identified when a single carrier vessel exhibits vessel movements consistent with encountering another vessel at sea, but no second vessel is visible on AIS, also known as a 'dark vessel'. Loitering events are estimated using AIS data to determine vessel speed, duration at a slow speed and distance from shore.

Note: AIS data is only one dataset and additional information available to RFMO Secretariats, RFMO members, and flag States is needed to provide a complete understanding of any apparent non-compliant or unauthorized fishing activity identified within this report. Only after investigation by the Secretariat or relevant flag and coastal State authorities should that determination be made and appropriate enforcement or regulatory action taken.

For more information on the data used in this study, or to request the data annex, please contact carrier-vessel-portal-support@globalfishingwatch.org.

Contents

List of Acronyms

AIS – Automatic Identification System
ICCAT – International Commission for the Conservation of Atlantic Tunas
CMM – Conservation and Management Measure
CPC - Contracting Party, Cooperating non-Contracting Party, Entity or Fishing Entity
CVP – Carrier Vessel Portal
EEZ – Exclusive Economic Zone
GFW – Global Fishing Watch
IUU – Illegal, Unreported, Unregulated
LSTLV – Large-Scale Tuna Longline Vessels
MCS – Monitoring, Control and Surveillance
PSMA – Port State Measures Agreement
RFMO – Regional Fisheries Management Organization
ROP – Regional Observer Program
VMS – Vessel Monitoring System

This report also refers to UN ISO 3166-1 alpha-3 country codes which can be found here for reference https://unstats.un.org/unsd/tradekb/knowledgebase/country-code.

Executive Summary

Transshipment in the International Commission for the Conservation of Atlantic Tunas (hereinafter referred to as the "ICCAT Convention Area") is currently regulated by Gen Rec 16-15 *Recommendation by ICCAT on Transhipment*. This recommendation includes reporting requirements for both fishing and carriers to help deter Illegal, Unreported, and Unregulated (IUU) fishing activities and better manage the fishery. Additionally, this Recommendation requires that all carriers transshipping ICCAT managed species are authorized by ICCAT and must carry an ICCAT observer at all times. The Recommendation acknowledges the need for greater monitoring, control and surveillance (MCS) of vessel activity and transshipments due to '*…grave concern that... a significant amount of catches by IUU fishing vessels have been transshipped under the names of duly licensed fishing vessels…*'.

Last year, GFW submitted a report to the 26th Regular Meeting of the Commission, in which commercially available Automatic Identification System (AIS) data was used to analyze the track histories of carriers operating within the ICCAT Convention Area during the calendar year 2017. This year, GFW analyzed carrier vessel activity in the Convention Area during calendar year 2018, to further investigate potential risk of non-compliance and trends in carrier vessel activity over time. This report looks at the effectiveness of the ICCAT Recommendation on Transhipment and considers what additional measures might be required to better monitor and control transshipment activity and detect and deter unauthorized transshipments or transfers of IUU-related catch sourced from the ICCAT Convention Area.

The ICCAT Regional Observer Program (ROP) for carriers is one of the most transparent observer programs amongst the tuna RFMOs. Included in the ROP reports are geolocations and dates of each observed at-sea transshipment conducted by carriers and longliners within the Convention Area. This level of transparency around activities at sea allows members to conduct due diligence and validate that reported information on their flagged vessels is consistent with what is reported by the ROP. This welcome level of transparency in reporting ensures more effective governance over transshipment at-sea within the ICCAT Convention Area, and reduces the risk that illegally caught or unreported fish enter the supply chain. The ROP could be further improved by the standardization of reporting requirements and additional detail in the submitted reports which would reduce the likelihood of discrepancies between the ROP reported information and the ICCAT ROP summary documents .

However, even with the high levels of transparency included in the ROP report, there was one CPC-flagged carrier, not identified in the ROP report, which was seen conducting AIS-detected encounters with longline vessels within the Convention Area. Additionally, there were discrepancies in the information provided by the ROP Observer Reports and the ICCAT ROP summary documents (Doc. No. PWG 402/2018 and Doc. No. PWG 402/2019). Not all ports visited by carriers after encounters with longliners were located within ICCAT member States, meaning they were not designated as ports of entry under the ICCAT Port State Measures Recommendation 18-09. This unobserved activity both at-sea and in-port increases the risk of

non-compliance to ICCAT transshipment management measures. ICCAT should consider the following recommendations to improve the Recommendation on Transhipment, and further reduce the risk of IUU fishing activities within the Convention Area.

Finding	Recommendation
● ICCAT has one of the most transparent carrier vessel ROPs of all tuna RFMOs, though reported information can be inconsistent	● Standardize the amount and type of information required from the ROP, and ensure consistency in reported information.
● Carrier vessel trips/encounters were conducted outside of the scope of the ROP.	● Investigate potential transshipment activity which was not reported on by the ROP. ● Require all active carriers conducting transshipments within the Convention Area to provide up to date information regarding flag State.
● There were a high number of loitering events vs encounters.	● Implement a centralized VMS to ensure effective oversight of carrier and fishing vessel activities. ● Expand the current ICCAT Recommendation on Transhipment requirement of CPCs and the ROP to record and report any encounters unrelated to the transfer of fish occurring within the ICCAT Convention Area.
● Encounters were detected on the high seas just outside EEZs after longline vessels were observed fishing within those EEZs.	● Ensure that fish transferred outside of EEZs are effectively monitored and reported to relevant authorities by establishing MoUs with non-CPC port States.
● There were a high number of port visits to Porto Grande, Cape Verde, and the purpose of these visits is unknown.	● Require ROP observers to report on non-transshipment port activity, such as transfers and offloading of crew and equipment, and refueling, during ROP observed voyages.

● carriers visited non-CPC ports after encounters with longline vessels.	● Ensure compliance with General Recommendation 18-09 on Port State Measures requiring use of ICCAT designated ports by carriers when offloading transshipped catch. ● Encourage port authorities in non-CPC port States to share landing declarations at ports used by carriers when landing ICCAT caught species.

Activity overview

Regional Observer Program (ROP)

ICCAT's ROP transshipment reports are among the most transparent of all five global tuna RFMOs. With the observer reports also made publicly available, the data provided by ICCAT suggest a welcome level of carrier vessel transparency that, if used alongside open source tracking data or, even better, a centralized VMS, could support the appropriate governance and oversight of transshipment activity at sea. However, more uniformity and consistency in ROP data reported, both in units used and better precision in observer reports, would increase the ability for GFW to conduct a full and accurate analysis of transshipment activity in comparison to AIS detected vessel activity.

GFW was able to estimate matches[1] between the observer reported transshipments in 2018 and AIS-detected data using vessel identify, location, and time. Approximately 75% of the AIS-detected encounters and 63% of the AIS-detected loitering events matched reported transshipments per documented ROP trip. In Figure 1 below, ROP reported transshipments have been overlaid with the GFW AIS detected encounter and loitering events. There is a strong spatial alignment between them. This correlation highlights how useful AIS data is as a tool for identifying potential transshipments. There were instances where AIS detected events, especially loitering events, where no transshipment activity was reported through the ROP. Although based purely on carrier track behavior, they indicate a possible transshipment may have occurred in which the fishing vessel was not transmitting AIS. Even though not all ROP reported transshipments matched an AIS-detected event, all of the ROP reported trips can be seen on AIS within the GFW Carrier Vessel Portal (CVP) and can be examined further by interested parties. The data annex provides the matching rates for each voyage.

[1] A matched encounter is defined as an encounter event within 12 hours and 10 kilometers of a reported transshipment event. A matched loitering event is defined as within 12 hours and 5 kilometers of a reported transshipment event. The matching algorithm is stricter as loitering events are less well defined than encounter events. For the purposes of this report only reported ROP at-sea transshipments of fish were matched to AIS-detected data.

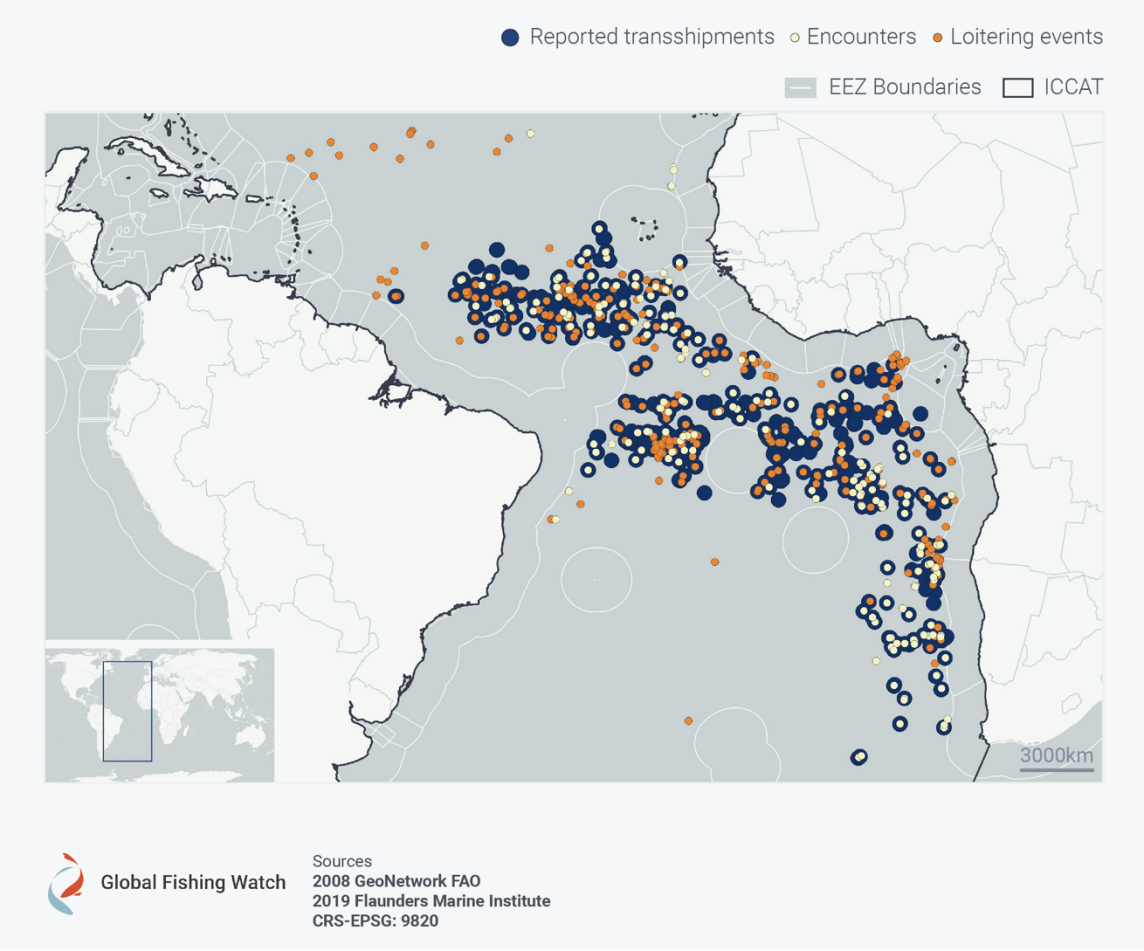


Figure 1. Reported transshipments overlaid with GFW AIS-Detected encounter and loitering events

Discrepancies between the number of reported transshipments and the number of encounters and loitering events detected via AIS are due to the limits of AIS, constraints of the encounter and loitering event definitions, and inconsistencies and inaccuracies in the detail provided in the ICCAT observer reports. While the ICCAT ROP is robust in the amount of information presented, there are inconsistencies in the precision and formatting of the data, specifically the transshipment location (latitude and longitude) provided, which GFW uses to match the event and can impact the matching rate. For instance, although the observer trip 222 is reported in table 2 in Doc. No. PWG_402/2019, the actual observer report with the individually documented transshipments appeared to be missing and consequently was unable to be matched to AIS data.

AIS Activity Overview

Encounters

GFW identified 1,586 events conducted by carriers operating on the high seas in the ICCAT Convention Area in 2018. Of these, 465 were encounters with identified fishing vessels, and 1,121 were loitering events that did not match an encounter event (Figure 2).

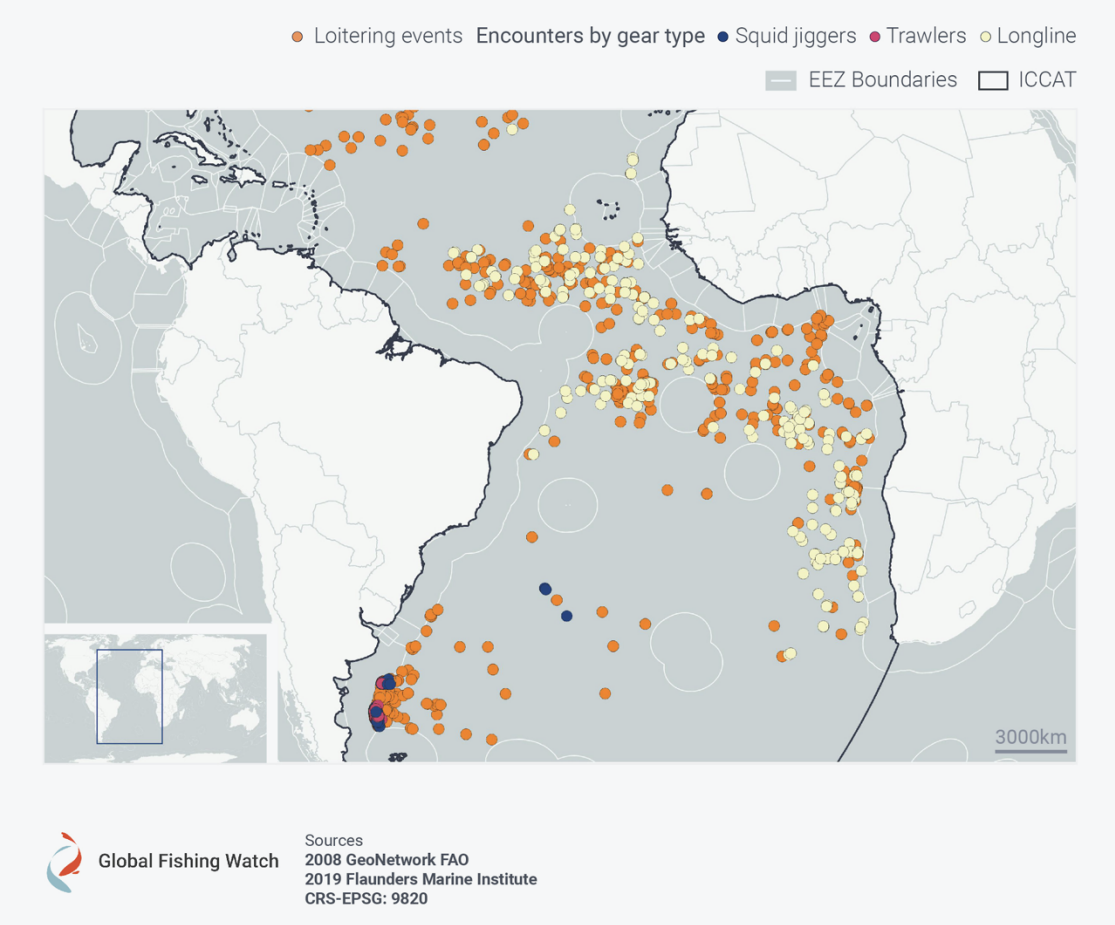


Figure 2. Potential transshipment events, including loitering and encounter events in the ICCAT Convention Area.

ICCAT Convention waters are home to a variety of different fisheries. For example, 136 encounters with squid jiggers in 2018 make up nearly a third (29.2%) of all AIS detected encounters by carriers. For the purposes of this report, further analysis of encounters on the high seas was restricted to the 211 encounters that involved a longline fishing vessel most likely to have been associated with capture of ICCAT managed species (Figure 2). In each of these encounters, the carriers and longline vessels involved were flagged to ICCAT Contracting Parties and/or Cooperating Non-Contracting Parties (collectively “CPCs”) (Figure 3).

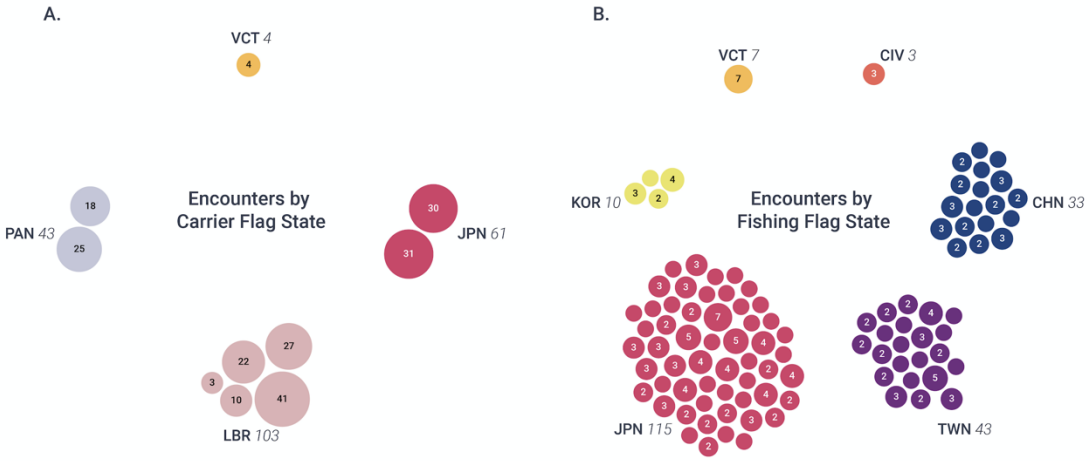


Figure 3. A. GFW-detected Encounter Events by Carrier Flag State and B. Fishing vessel Flag State. *Note: bubbles indicate unique carriers*

Each of the AIS-detected encounters with longline fishing vessels were conducted during carrier vessel trips which were reported on by the ICCAT ROP. The ROP reported nine voyages by Liberian flagged vessels in 2018, seven by Japanese flagged vessels, and four by Panamanian flagged vessels. These same trips were documented using GFW data (Figure 4). However, ICCAT reported a total of 648 transshipments, while GFW detected 439 potential transshipments (encounter and loitering events) on these same trips. GFW may have detected fewer potential transshipments because of restrictions in the encounter and loitering algorithms. However, the AIS data provides additional information that cannot be obtained from the ROP. For instance, GFW detected a carrier vessel trip which included four encounters and eight loitering events which did not appear in the ROP report (Figures 4 and 5).

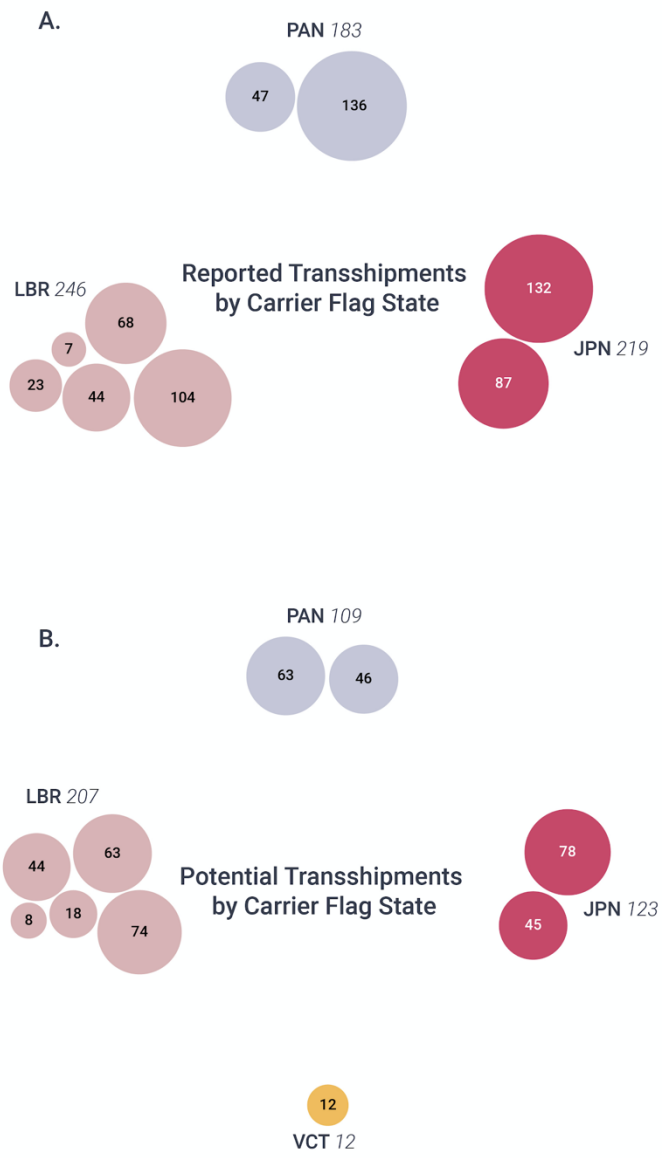


Figure 4. A. Reported Transshipments by Carrier Flag State. B. GFW AIS-Detected Potential Transshipments by Carrier Flag State. *Note: bubbles indicate unique carriers*

This trip was conducted by a carrier flagged to Saint Vincent and the Grenadines, a flag State red carded by the EU in 2017[2]. According to the FAO, since 2017 the vessel does not appear to be authorized, and is considered to have inactive authorization based on public ICCAT records. Furthermore, the detected encounters by this carrier were conducted with a single longline

[2] https://www.seafoodsource.com/news/environment-sustainability/comoros-saint-vincent-and-the-grenadines-given-red-card-by-european-commission

vessel also flagged to Saint Vincent and the Grenadines. According to the International Maritime Organization, midway through 2018, the carrier vessel changed flags to “unknown” flag before engaging in an additional encounter with the same longline vessel and more loitering events. This vessel’s activity should be of interest to the Compliance Committee.

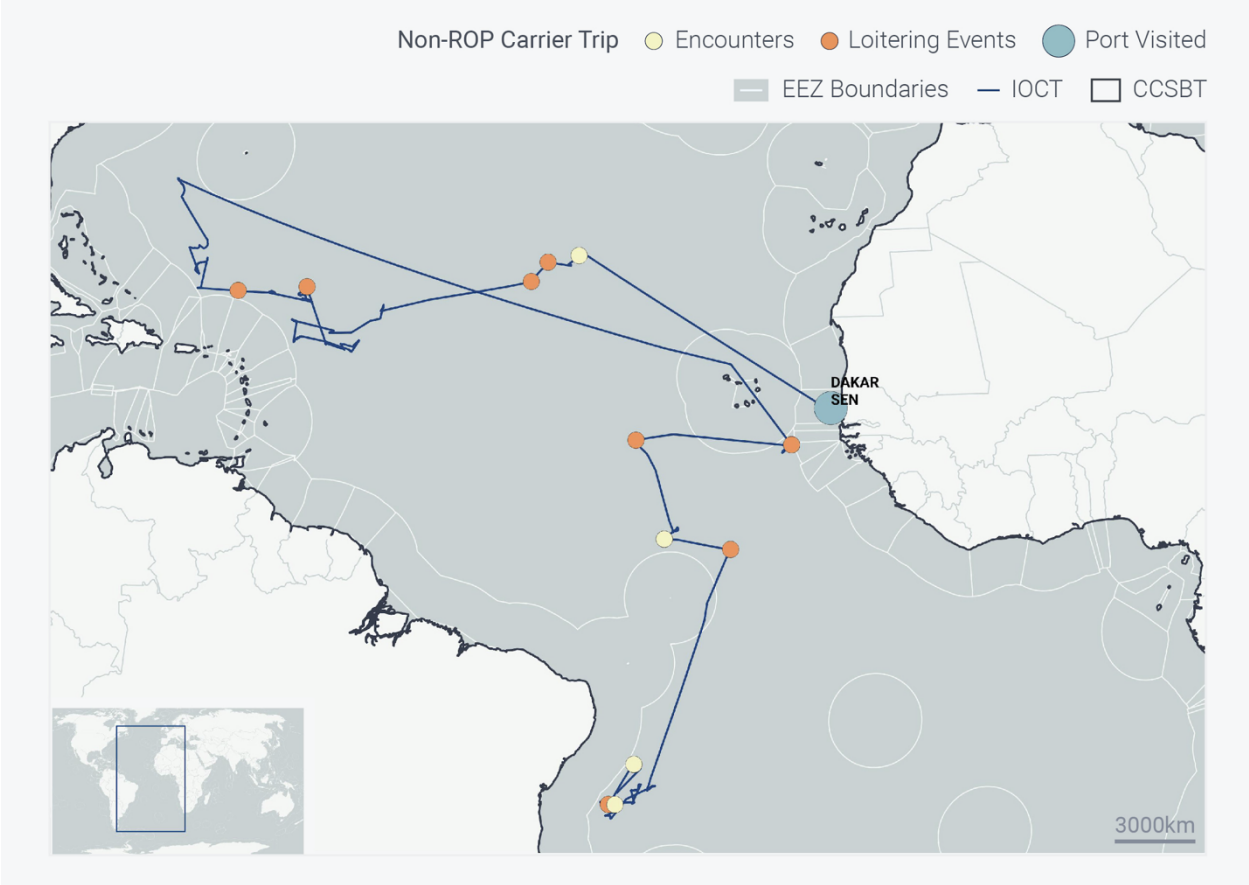


Figure 5. Track history of the VCT flagged carrier vessel that did not report to the ROP

Loitering events

When analyzing AIS data for potential transshipments at sea, there are generally many more loitering events observed than there are encounter events. This is due to a variety of factors. Primarily, because the definition of a loitering event is less restrictive and only dependent on the AIS transmission of a single vessel. Additionally, some fishing vessels transmit on class B AIS, which has inconsistent satellite reception. GFW algorithms detected 1,121 loitering events by carriers on the high seas of the Convention Area in 2018. These loitering events did not overlap with any encounters.

As highlighted in Figure 1 above these loitering events can be indicative of, but not proof of, transshipment. Not all these events will be transshipment of fish, and some may be associated

with other at-sea activities like mechanical issues and waiting for port access. In cases where they do indicate an encounter with a fishing vessel, this may be related to the transfer of bait, food or other bunkering, but it also may indicate that activity at sea may go unobserved. In 2018, there were significantly more loitering events inside the ICCAT Convention Area than encounters on the high seas, but also specifically within EEZs of coastal States. It is recommended that electronic monitoring (EM) of carriers is adopted alongside VMS to reduce the risk of unauthorized transshipments inside the Convention Area, particularly in the waters of coastal States.

High Seas Loitering Events

To estimate loitering events which are more likely to indicate a transshipment related to the transfer of ICCAT managed species, GFW removed loitering events conducted by carriers which had encounters with non-longline vessels from the analysis. The events were further narrowed down to include only those which occurred within the latitudinal boundaries in which encounters with longline vessels had also been observed. This resulted in 301 loitering events likely related to an ICCAT transshipment. Of these, 70 were conducted by a carrier that did not carry an ICCAT ROP observer, or were conducted during a voyage that did not appear in the ROP report (Figure 6).

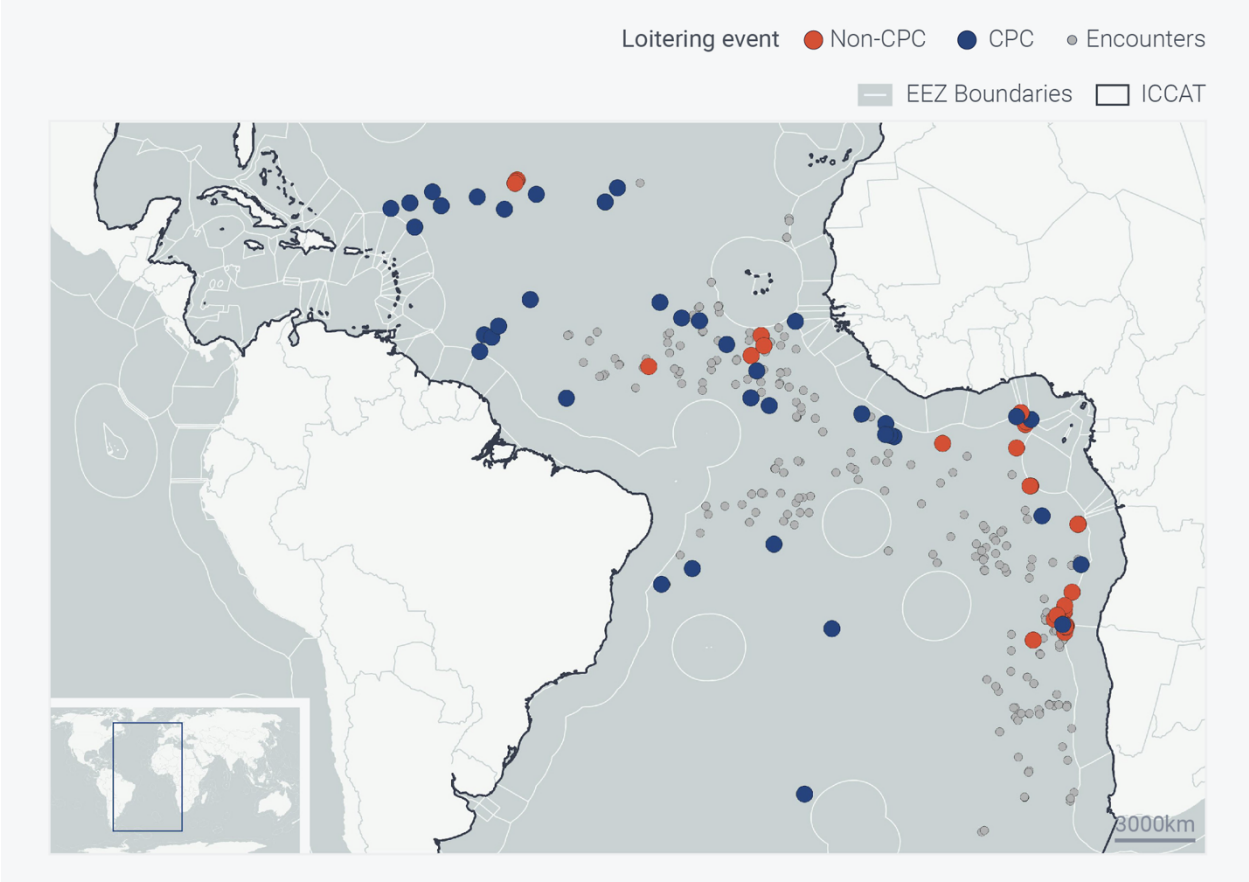


Figure 6. Loitering events that did not occur during ROP reported vessel trips by both Non-CPC (red) flagged carriers and CPC (blue) flagged carriers.

The 301 loitering events were conducted by 48 carriers from 16 flag States. The 13 Liberian flagged carriers were involved in 115 of the events, followed by the 11 carriers flagged to Panama (78 events) and the two carriers flagged to Japan (62 events). Almost all of the events (271, or 90%) were conducted by 34 carriers flagged to ICCAT CPCs. The remaining 30 events were conducted by 14 carriers flagged to non-CPCs (Figure 7).

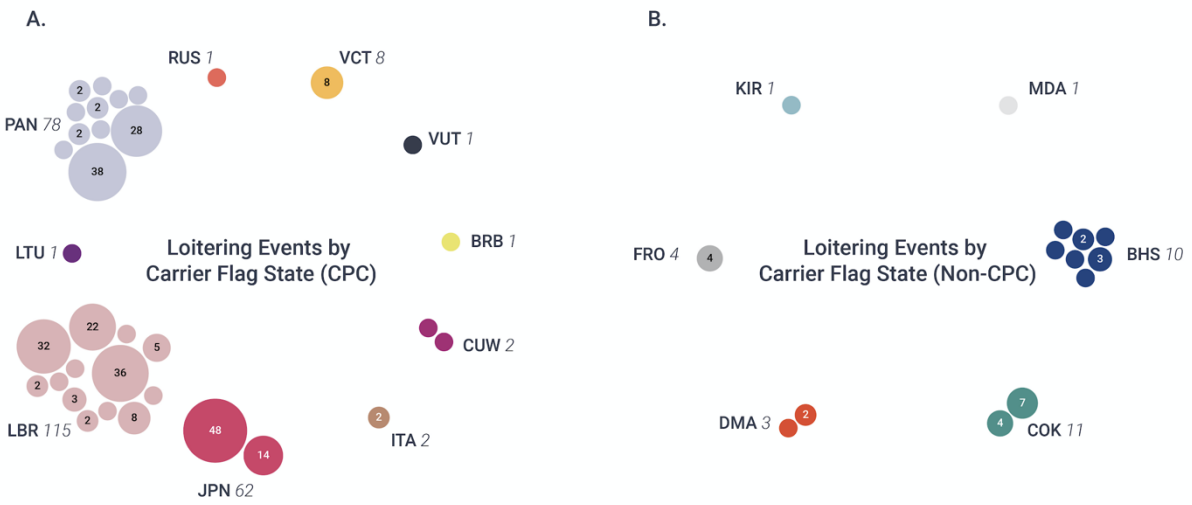


Figure 7. A. Loitering events by CPC Carrier Flag State and B. Non-CPC Carrier Flag State

EEZ - Loitering Events

GFW detected a higher number of loitering events within EEZs than on the high seas. There were a total of 929 loitering events detected inside EEZs. Within the same latitudinal bounds, only six encounters between carrier and fishing vessels were detected, and these encounters were with trawler fishing vessels (Figure 9). This activity should be of interest to ICCAT and its member States because of the risks associated with unreported transshipments that can impact coastal States licensing revenue and resources.

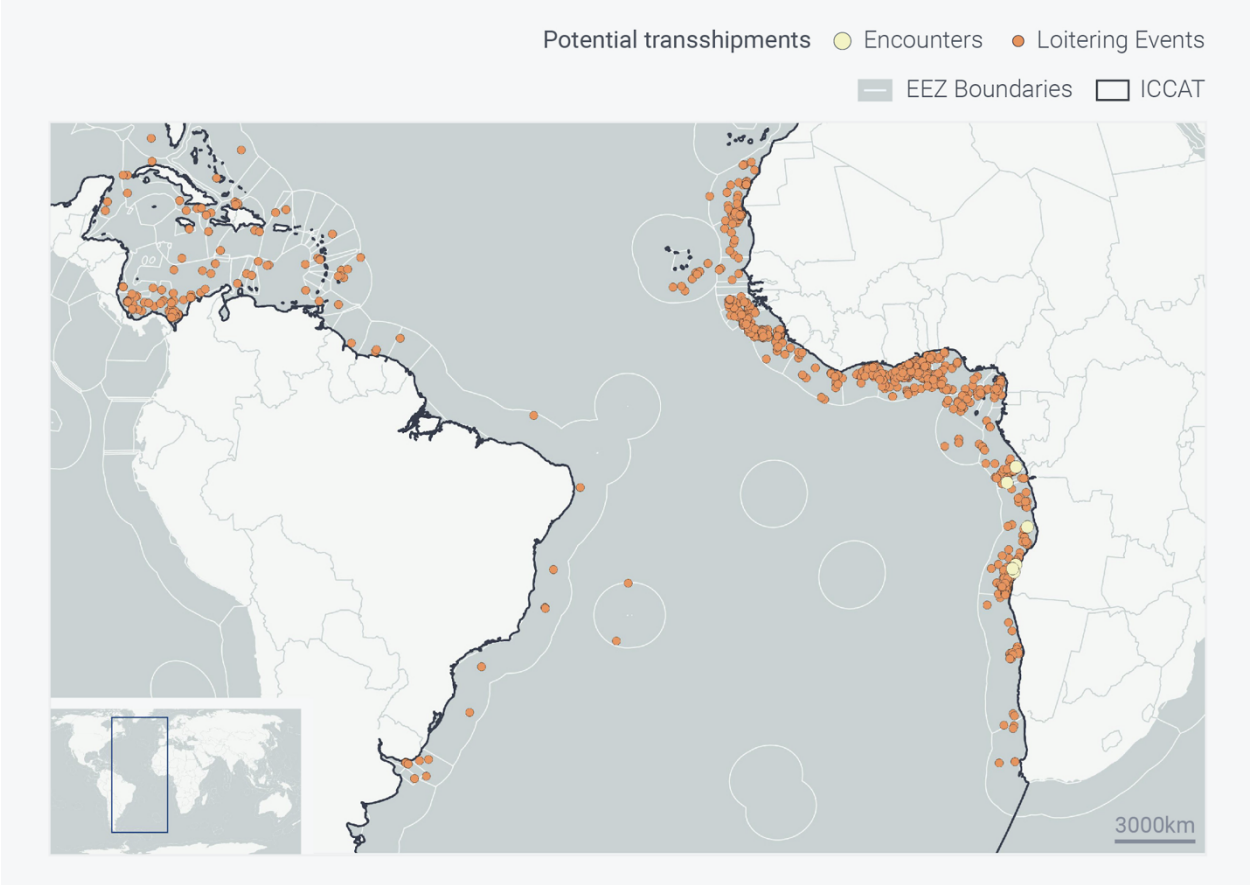


Figure 9. Loitering and encounter events detected inside EEZs within the latitudinal bounds of ICCAT high-seas potential transshipments

Of the 929 loitering events, 773 (83%) occurred within West African EEZs (Figure 9). A proportion of these events will be related to normal sea operation of vessels including waiting to enter port, resupplying, and authorized transshipments. However, some may also be linked to unauthorized transshipments. Under the current reporting framework, investigating loitering events is challenging due to a lack of data on these activities.

The West African Coast has long been identified as a place of rich fishing grounds, and vulnerable to significant IUU fishing activity (Doumbouya et al. 2017, INTERPOL 2014). In addition to the large amount of underreported fishing by foreign distant water fleets, and illegal fishing, incidents of piracy and human trafficking have also been prevalent in West African waters over the previous decades (Belhabib et al. 2019, INTERPOL 2014). Activities such as transshipment and disabling monitoring devices, such as AIS, enable IUU activity (INTERPOL 2014), and a need for MCS support in West African countries with less capacity for fisheries oversight has been recommended to identify potentially illicit activity (Belhabib et al. 2019, INTERPOL 2014).

A centralized VMS measure within ICCAT for all authorized vessels, including carriers, would ensure that all vessels are transmitting their location to the relevant authorities, and all reported activity can be validated. Additionally, ICCAT should consider including within their existing transshipment Recommendation the requirement of CPCs and the ROP to record and report any encounters unrelated to the transfer of fish occurring within the ICCAT Convention Area. This would increase the transparency around carrier vessel activity at sea and would improve ICCAT's already robust reporting requirements.

Case Study: Activity in West African EEZs

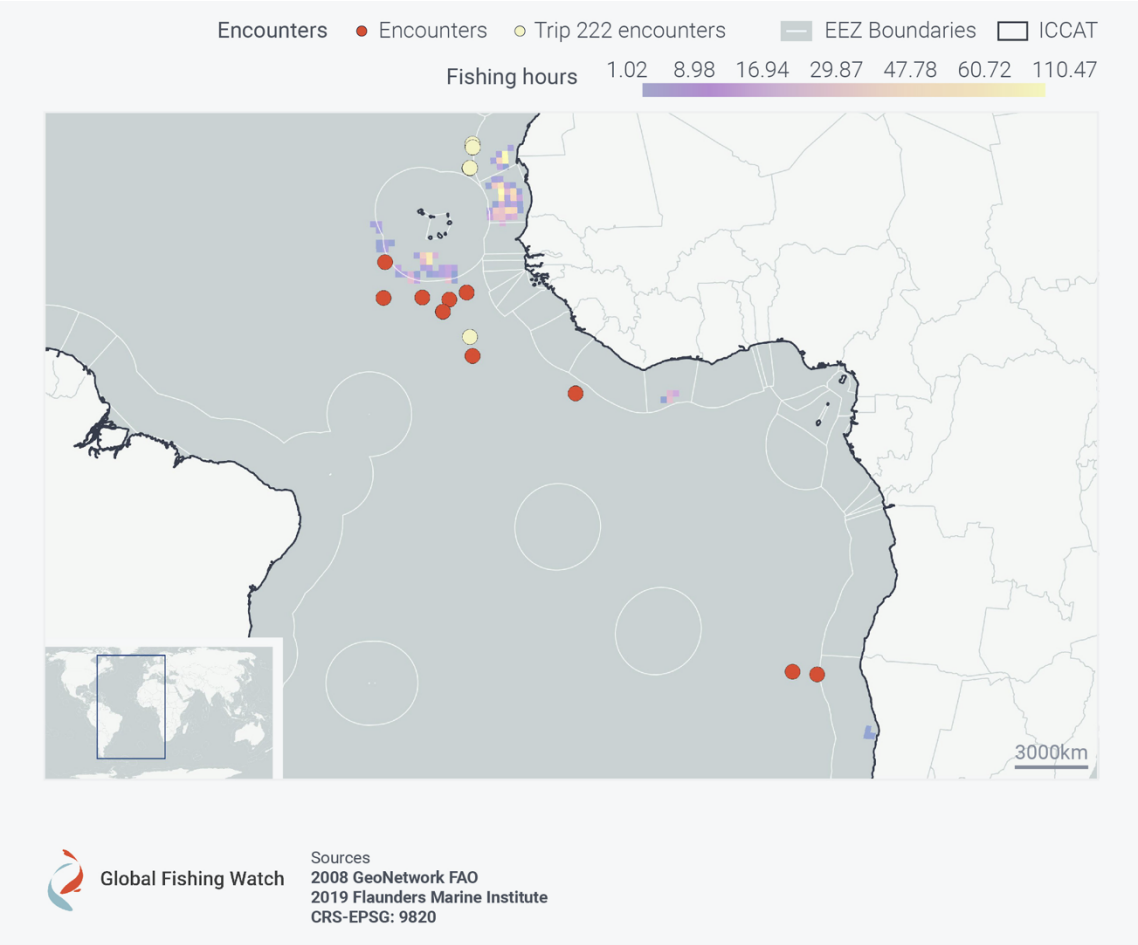


Figure 10. Encounters after fishing by longline vessels inside West African EEZs

In the image above, the red circles represent encounters between carriers and longline vessels which occurred after the longliners were observed fishing within nearby EEZs. All of these encounters occurred during ROP reported carrier trips. The fishing effort is shown in a gradient of purple to yellow, yellow indicating more fishing hours. Both the fishing and carriers observed in these encounters are flagged to ICCAT CPCs. However, in this image, it is clear that longline vessels spent time fishing within West African EEZs, and then encountered carriers after, on the

high seas. It is therefore possible that species caught within coastal State's EEZs were transferred and landed outside of the EEZ. Therefore, member States may wish to consider increased oversight of transshipment activity conducted just outside their national areas/waters through improvements to the current transshipment Recommendation to ensure that transfers of fish caught within EEZs are being properly monitored and reported to relevant authorities in near real time.

The encounters directly outside of the Mauritania EEZ occurred during reported trip 222 (see Doc. No. PWG_402/2019), however, no observer report was identified and therefore no reported transshipments could be matched to this AIS data.

Port Visits

A number of ports were visited after encounters and loitering events occurred in the Convention Area in 2018, chief among them was Porto Grande, Cape Verde (Figure 10).

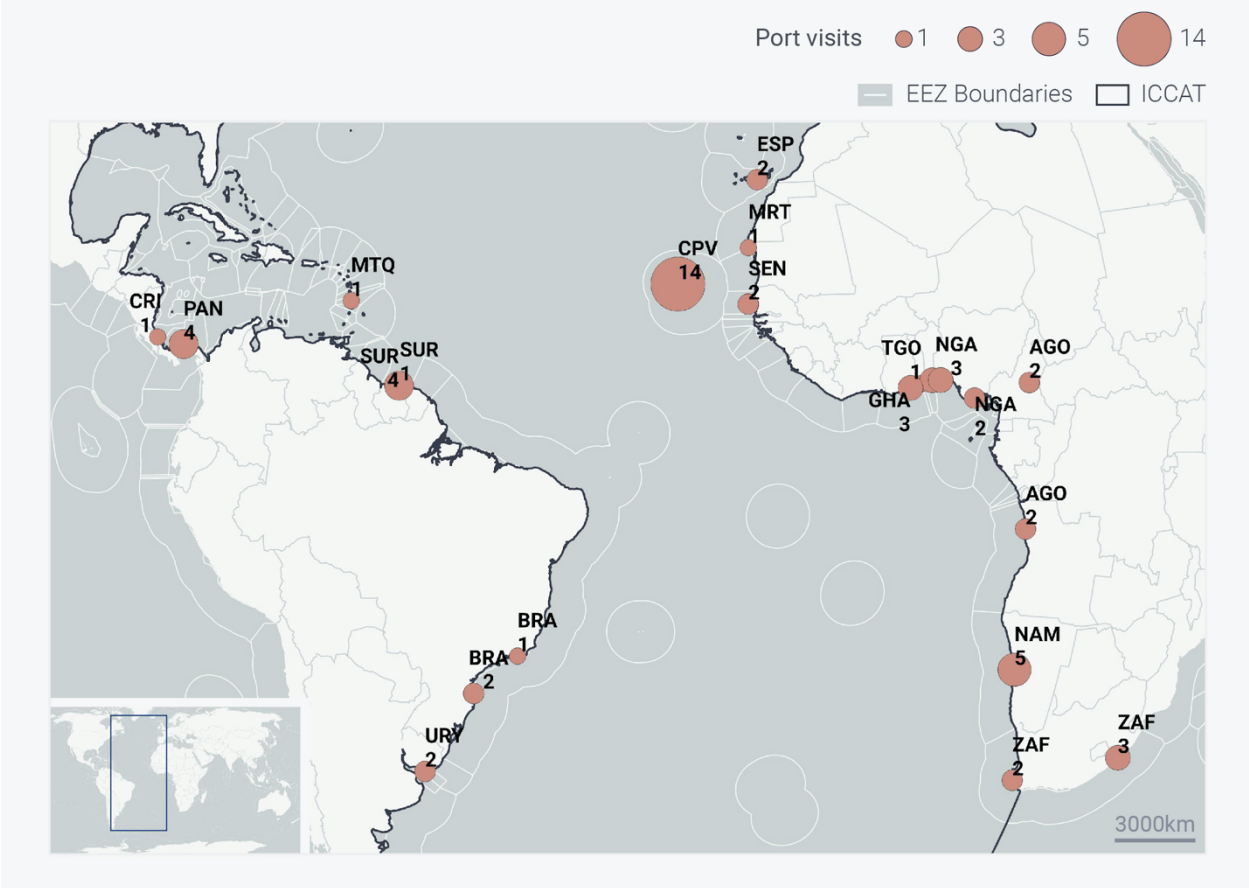


Figure 10. Count of port visits by carriers after potential transshipment events on the high seas in the ICCAT Convention Area.

Designated ports of entry

ICCAT General Recommendation 18-09 on Port State Measures requires CPCs which open their ports to foreign flagged vessels carrying ICCAT-managed species, and/or fish products originating from such species, that have not been previously landed, to designate ports of entry and share their list of designated ports with the ICCAT Secretariat, who shall keep record of those ports on the ICCAT website. Two of the eight ports visited by carriers after an encounter with a longline vessel are not within CPC States, and are therefore not designated ports of entry under the ICCAT Record of Ports (Table 1). This raises the risk that ICCAT-managed species are entering ports of non-CPCs, and are potentially not being subject to the level of controls required by ICCAT of its CPCs. This is a potential loophole that can be exploited by IUU operators and highlights the need for consistent PSMs, in line with the PSMA, across all RFMOs.

Table 1. Port Visits by Carriers after Encounter Events with Longline Vessels

Port State	Port	PSMA [3]	PSMA DPE[4]	ICCAT DPE[5]	ICCAT CPC[6]	Carrier Visits
Cabo Verde	Porto Grande	Yes	No	Yes	Yes	13
Mauritius	Port Louis	Yes	No	No	No	4
Singapore	Singapore	No	No	No	No	4
Namibia	Walvis Bay	Yes	Yes	Yes	Yes	3
Senegal	Dakar	Yes	No	Yes	Yes	2
South Africa	Cape Town	Yes	Yes	Yes	Yes	2
Panama	Colon	Yes	No	Yes	Yes	1
South Africa	Durban	Yes	Yes	Yes	Yes	1

[3] http://www.fao.org/treaties/results/details/en/c/TRE-000003/
[4] http://www.fao.org/fishery/port-state-measures/psmaapp/?locale=en&action=qry
[5] https://www.iccat.int/en/Ports.asp
[6] https://www.iccat.int/en/contracting.html#

Ports designated for entry under ICCAT General Recommendation 18-09 are ports within which port State CPCs must guarantee a certain standard of port inspections. Any ports used to land or transship ICCAT managed species which are not designated for entry by ICCAT CPCs may not provide the same level of inspection and oversight of landed catch. As noted in Paragraph 43 of ICCAT 18-09, "*The Commission shall review this Recommendation no later than its 2020 Annual Meeting and consider revisions to improve its effectiveness*". Therefore, at this year's ICCAT meeting, the Commission may want to revise 18-09 to ensure more effective oversight in ports not currently designated for entry under the Record of Ports. Furthermore, the below table details the ports which were visited by carriers after AIS detected loitering events. Of the top 10 ports visited, only seven are designated ports of entry under ICCAT's Record of Ports (Table 2).

Table 2: Top 10 Ports visited after loitering events

Port	Country	PSMA	PSMA DPE	ICCAT DPE	ICCAT CPC	Carrier Trips
Porto Grande	CPV	Yes	No	Yes	Yes	13
Walvis Bay	NAM	Yes	Yes	Yes	Yes	5
Colon	PAN	Yes	No	Yes	Yes	4
Port Louis	MUS	Yes	No	No	No	4
Singapore	SGP	No	No	No	No	4
Paramaribo	SUR	No	No	Yes	Yes	4
Durban	ZAF	Yes	Yes	Yes	Yes	3
Cotonou	BEN	No	No	No	No	3
Lagos	NGA	No	No	No	Yes	3
Tema	GHA	Yes	Yes	Yes	Yes	3

The above tables not only highlight the ICCAT designated ports of entry but also the status of ports visited under the FAO's PSMA. Seven of the eight port States visited by carriers after an encounter are party to the PSMA, however, four of these seven ports are not designated for entry under the PSMA, even though three of those four ports are designated for entry through ICCAT. Additionally, when considering ports visited after loitering events, the percentage of PSMA ratified ports decreases substantially.

Port State CPCs should consider designating their ports for entry for tuna and tuna-like species under both ICCAT regulations and through the PSMA to ensure effective monitoring and control of landing of ICCAT managed species, and to prevent IUU sourced catch from entering the supply chain. Since ICCAT General Recommendation 18-09 is aligned with the PSMA, ICCAT should consider requiring those ports to be designated under the PSMA and ensure the same level of control over vessels carrying ICCAT-managed species as well as any other product.

Visits to Porto Grande

Porto Grande, Cape Verde was the most visited port by carriers after encounters and loitering events in the ICCAT Convention Area in 2018. In fact, every carrier trip documented in the 2018 ROP report includes a stop in Porto Grande, though these port visits are not documented in the detailed MRAG reports. The high number of port visits suggest the port is used as a stopover by carriers during longer voyages, as was the case during the previous year's ROP. GFW's 2017 ICCAT transshipment report identified 13 port visits to Porto Grande during a longer carrier deployment, noting that it was unclear if these visits involved the offloading of fish, or if stops were made solely for other reasons. It is important to note that if carriers have non-landed ICCAT managed fish on board when visiting a port, then their activity is covered by the PSMs, which includes visits to "*...port for landing, transshipping, packaging, or processing fish that have not been previously landed and for other port services, including, inter alia, refueling and resupplying, maintenance and dry docking*" (Gen Rec 18-09 pg 4-5).

Given the frequency of visits to the port, ICCAT and member States may consider increasing port inspection controls and measures in Porto Grande to ensure compliance to transshipment and landing CMMs. Considering the importance of traceability of the catches, ICCAT should adopt stringent reporting requirements for in-port transshipments, such as in-port observer reporting when present, and should ensure that such reports are made available to port State authorities to facilitate the implementation of Gen Rec 18-09.

Conclusions and Recommendations

This analysis highlights the complicated nature of managing at-sea transshipment in the ICCAT Convention Area. Though current oversight and reporting mechanisms are more advanced than

other tuna RFMOs, there are still improvements to be made to ensure increased transparency and consistency in managing transshipments of ICCAT managed species.

With carrier vessel trips detected via AIS which occurred outside the scope of the ROP, there is a clear risk for transshipments to go unobserved and unreported. Additionally, Member States may want to increase oversight over their own managed waters, as AIS data showed transshipments were taking place just outside an EEZ after observing significant fishing effort within it.

Finally, ports visited after encounters with longline vessels and loitering events highlights the need to ensure effective port inspection schemes during landing. ICCAT may want to encourage port States to designate official ports of entry to improve transparency of port landings. These key findings and corresponding recommendations for the Commission to consider are provided in the table below:

Finding	Recommendation
● While ICCAT has one of the most transparent ROPs of all tuna RFMOs, recorded information is variable in quality	● Standardize the information required from ROP, and ensure consistency in reporting.
● Carrier vessel trips/encounters were conducted outside of the scope of the ROP.	● Investigate potential transshipment activity which was not reported on by the ROP. ● Additionally, ensure the ICCAT registry includes up to date information regarding flag States of active carriers conducting transshipments within the Convention Area.
● There were a high number of loitering events vs encounters.	● For more effective MCS, implement a centralized VMS system to ensure effective oversight of carrier and fishing vessel activities. ● Expand the current ICCAT Recommendation on Transhipment requirement of CPCs and the ROP to record and report any non-transshipment encounters occurring within the ICCAT Convention Area.

● Encounters were detected just beyond EEZ limits following significant observed fishing effort within them.	● Ensure that fish transferred outside of EEZs are effectively monitored and reported to relevant authorities by establishing MoUs with non-CPC port States.
● There were a high number of port visits to Porto Grande, Cape Verde, and the purpose of these visits is unknown.	● Require ROP observers to report on non-transshipment port activity, like transfers and offloading of crew and equipment, and refueling, during ROP observed voyages.
● Carriers visited non-CPC ports after encounters with longline vessels.	● Ensure compliance with General Recommendation 18-09 on Port State Measures requiring use of ICCAT designated ports by carriers when offloading transshipped catch. ● Encourage port authorities in non-CPC port States to share landing declarations at ports used by carriers when landing ICCAT caught species.

The spatial alignment between the MRAG ROP and this comprehensive analysis of AIS-based CVP data demonstrates an additional method for correlation of information to help build a more comprehensive assessment of vessel activity on the high seas for all flag States and vessel types. This should help enable improved regulation and management of transshipment activity. Member States should consider implementing comprehensive national AIS requirements for their authorized fleets to assist this. Critically, the Commission should consider tasking the ICCAT Secretariat to conduct annual reviews of transshipment activity using all sources of information available to build on this initial analysis by GFW and validate the efficacy of the ICCAT transshipment management measures.

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Annex 1. Detailed Methodology

AIS-based data methods

Carriers registered over 300 gross tons and on international voyages are already required to broadcast on Automatic Identification System (AIS), as mandated by the International Maritime Organization (IMO) (IMO 2002). Although the use of AIS is not globally mandated for fishing vessels, AIS used in fishing fleets is increasing with a growing number of flag and coastal States mandating its use through their own national or regional fisheries regulations. AIS devices broadcast the location of a vessel along with other information, including identity, course and speed. This makes the use of AIS, and its subsequent analysis, very useful in understanding fishing activity that can be used to support and complement existing national and RFMO Monitoring, Control and Surveillance (MCS) programs. This is especially true as AIS can provide a greater insight of fishing vessel activities, especially when these interactions involve vessels of differing flag States where VMS data is not publicly available or readily shared between authorities.

The Carrier Vessel Portal (CVP) is established using GFW datasets developed from AIS data. The CVP uses the same datasets used in the 2017 transshipment reports (https://globalfishingwatch.org/rfmo-transshipment/), including possible transshipment events defined as encounter and loitering events, port visits by carriers, vessel identity information broadcast from AIS, and publicly available vessel registry data.

GFW uses publicly broadcasted AIS data to estimate vessel information and vessel activity, including fishing, encounters and loitering events. Encounters, where two vessels meet at sea, may indicate possible transshipment activity between two vessels. Vessel encounters are defined when two vessels are within 500 meters of each other for at least 2 hours and traveling at < 2 knots, while at least 10 kilometers from a coastal anchorage (Miller et al. 2018). Whereas, vessel loitering is when a carrier vessel travelled at speeds of < 2 knots for at least 4 hours, while at least 20 nautical miles from shore (see Miller et al. 2018 for original methodology, however the original minimum of 8 hours has been changed to 4 hours for the purposes of this study).

Loitering by a single carrier vessel where the carrier vessel exhibits behavior consistent with encountering another vessel at sea, but no second vessel is visible on AIS, may also indicate a possible transshipment event but where there is no AIS data for the second vessel, also known as a ‘dark vessel’ (Figure A1). Loitering events may indicate a possible

encounter for which data is lacking for the second vessel, possibly due to lack of AIS transmission, poor satellite coverage, or the size of the second vessel (INTERPOL 2014).

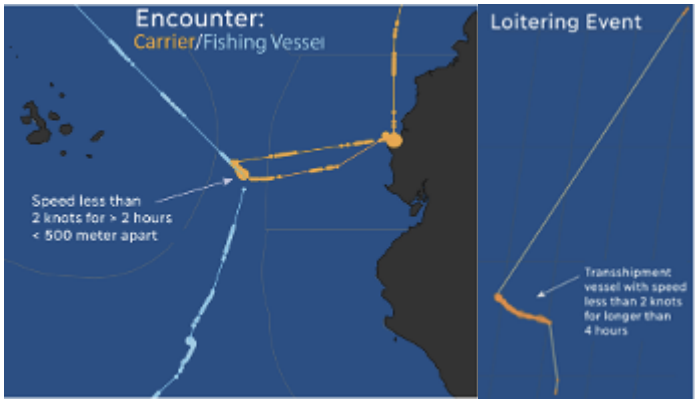

Figure A1 - Examples of vessel tracks during typical 'Encounter' where two vessels meet at sea and 'Loitering' events where a carrier vessel (referred to as transshipment vessel) has behavior consistent with encountering an LSTLV at sea but no LSTLV is visible on AIS

The GFW database also contains an estimate of port visits conducted by carriers (see Annex 2). GFW defines ports as any 0.5-kilometer grid cell with 20 or more unique vessels stationary for greater than 12 hours. A port visit includes the port entry and exit of a vessel if the vessel stops. A vessel "enters" port when it is within 3 kilometers of a GFW-defined port. A vessel has 'stopped' when it has entered port and slowed to a speed of 0.2 knots and has started movement again when it moves over 0.5 knots. A vessel "exits" port when it is at least 4 kilometers away from the previously entered port. Note, for the purposes of this analysis any port visits that had a duration of less than 3 hours were removed from the data. Port stops can vary in duration from less than an hour to multiple weeks. Generally, very short port stops, as defined by GFW, may be intermediate ports a vessel stops at before entering a port to conduct activities of interest to this report, such as offloading of catch. Therefore, in an attempt to exclude intermediate ports, this analysis excluded port visits of less than 3 hours, so that all voyages ended at ports where the carriers remained for at least 3 hours.

The carrier and fishing vessels analyzed in this report were chosen based on the GFW database of fishing and carriers. The fishing database is defined in Kroodsma et al. (2018) and includes fishing vessels based on registry database information or as defined by a convolutional neural network (Kroodsma et al. 2018). Fishing vessels capable of fishing tuna were defined by the GFW vessel classification using known registry information in combination with a convolutional neural network used to estimate vessel class (network described in Kroodsma et al. 2018). The carrier database is defined in Miller et al. (2018) and was curated using International Telecommunication Union and major RFMOs, vessel movement patterns based on AIS, a convolutional neural network

used to estimate vessel class (see Kroodsma et al. 2018) and the International Maritime Organization (IMO) unique identifier.

For the purposes of the ICCAT 2018 transshipment analysis loitering events were restricted to those that are <= 24 hours in duration, due to a finding from the 2017 transshipment reports (for example see section 4.6 in the 2017 ICCAT report found here: https://globalfishingwatch.org/rfmo-transshipment/) that these loitering events are more likely to indicate possible transshipment activity.

For the case study focusing on apparent fishing hours inside EEZs prior to encounter events the fishing hours were calculated if they occurred after leaving port and after any previous carrier encounter and within three weeks prior to an encounter with a carrier vessel. Apparent fishing hours were summed by 0.5 degree bins. Apparent fishing is estimated using a convolutional neural network that uses AIS based data such as vessel speed, direction, and rate of turn to classify if a fishing vessel is likely fishing or transiting (not fishing) (See Kroodsma et al. 2018).

Vessel authorization was established by using the publicly available vessel registry produced by ICCAT[7] and CCSBT[8] along with the ICCAT Observer Reports[9]. If a carrier or fishing vessel was listed as 'authorized' on any of the public registries during an encounter or loitering event the event was considered 'authorized'. However, if a vessel was not authorized on one of the three registries during the time period of an encounter or loitering event the authorization status is unknown. The ability to determine vessel authorization is largely dependent on the accuracy and comprehensiveness of the public registries, as well as the vessel information (name, MMSI, IMO, callsign) transmitted on AIS by the vessel and used by GFW.

Data caveats

The analysis presented in this report relies on commercially available AIS data and publicly available information. Therefore, the AIS data is limited by those vessels that transmit AIS data and do so by providing accurate vessel identity information. AIS data can be tampered with, but GFW does implement methods to help correct for false AIS data. Low satellite coverage of high-density areas can also limit AIS data usefulness, although the high seas ICCAT Convention Area has relatively strong Class-A AIS coverage, with the exception of the Gulf of Mexico, parts of Europe outside the range of

[7] https://www.iccat.int/en/VesselsRecord.asp
[8] https://www.ccsbt.org/en/content/ccsbt-record-authorised-vessels
[9] https://www.iccat.int/en/ROP.html

terrestrial receivers along the coast, and parts of the southern Atlantic Ocean (see Taconet, Kroosdma, and Fernandes 2019). AIS data tends to be sparser and more limited for vessels equipped with Class-B AIS devices (Kroodsma et al. 2018). For further analysis of GFW AIS data quality in the Atlantic Ocean refer to: Taconet, Kroodsma, and Fernandes 2019. AIS device class often depends on flag State regulations, vessel length, and vessel purpose. Because of the limitations of AIS data, lack of complete and accurate public vessel databases and registries, and limitations of modelling estimations, the AIS detected encounter, and loitering data are represented as accurately as possible but should be considered restrained estimates based on these limitations (see Kroodsma et al. 2018, Miller et al. 2018, and https://globalfishingwatch.org/ for further discussion).

Appendix 2

Mr. Derek Campbell
Chair of the Conservation and Management Measures Compliance Committee
International Commission for the Conservation of Atlantic Tunas (ICCAT)

11 October 2021

Dear Mr. Campbell,

Ref. Summary note on information shared with ICCAT in 2020 and 2021

The Environmental Justice Foundation (EJF) is an international not for profit organisation working globally to combat illegal, unreported, and unregulated (IUU) fishing. EJF promotes and encourages international information-sharing to enhance transparency in the fisheries sector and prevent, deter, and eliminate IUU fishing. To this end, EJF gathers information on fishing vessels' identities and activities through a combination of field investigations, satellite monitoring, human and open source intelligence, and community surveillance projects.

On 16 October 2020, 4 November 2020, and 17 June 2021, we have shared with the Secretariat of ICCAT information on fishing vessels having potentially engaged in IUU fishing activities in the Atlantic Ocean. These transmissions were made in accordance with ICCAT Recommendation 08-09[1].

Ahead of the meeting of the 27th Regular meeting of the Commission and of its compliance committee, I wish to provide the Conservation and Management Measures Compliance Committee with a summary of that information.

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– *Vessel Activity Notification of 16 October 2020*

With our Vessel Activity Notification (VAN) of 16 October 2020, we have drawn the attention of the Secretariat of ICCAT to the fact that data from automatic identification systems (AIS) indicated that two fishing vessels reportedly flying the flag of Saint Vincent and the Grenadines (VCT) had potentially engaged

[1] [1] ICCAT, 'Recommendation by ICCAT to establish a process for the review and reporting of compliance information', accessed 7.10.2021, https://www.iccat.int/Documents/Recs/compendiopdf -e/2008-09-e.pdf.

– from July 2020 – in fishing in the area under the competence of ICCAT while not on the ICCAT record of vessels. Based on information available, these two vessels were identified under the names of "RICOS NO. 3" (IMO: 8568682) and "RICOS NO. 6" (IMO: 8568694). Should the activities described in this notification have taken place, EJF noted that they could fall under paragraph 1(a) of ICCAT Recommendation 18-08 which provides that: "vessels [...], are presumed to have carried out [IUU] fishing activities in the ICCAT [...], inter alia, when [...] such vessels harvest tuna and tuna-like species in the Convention Area and are not registered on the relevant ICCAT list of vessels authorised to fish for tuna and tuna-like species in the ICCAT Convention Area"[2]. In addition to sharing this notification with the Secretariat of ICCAT, EJF also shared it with the competent authorities of Belize and VCT, and with the relevant services of the European Commission.

– *Vessel Activity Notification (update) of 4 November 2020*

On 4 November 2020, we have shared with the Secretariat of ICCAT an updated version of the notification we had shared on 16 October 2020. This updated version of the notification included information received from the competent authorities of VCT and further information on the modus operandi of the vessels (i.e., port calls and fishing activities). More particularly, this notification aimed at informing relevant authorities and bodies on the possibility that the vessels had been deregistered by VCT on 13 September 2018. In addition, and based on further AIS data analysis, EJF identified that both vessels would have been present in the Atlantic Ocean before July 2020. Available data was, inter alia, suggestive of possible fishing activities in the waters under the national jurisdiction of a coastal state in the Convention area. As such, and should the activities described in this notification have taken place, EJF noted that they could not only fall under paragraph 1(a) of ICCAT Recommendation 18-08 for the reasons mentioned above, but also under its paragraphs 1(h) (i.e., "vessels [...], are presumed to have carried out [IUU] fishing activities in the ICCAT [...], inter alia, when [...] such vessels harvest tuna or tuna-like species in the waters under the national jurisdiction of the coastal states in the Convention area without authorisation or infringe on that state's laws and regulations") and 1(i) (i.e., "vessels [...], are presumed to have carried out [IUU] fishing activities in the ICCAT [...], inter alia, when [...] such vessels are without nationality and harvest tuna or tuna-like species in the ICCAT Convention area"). In addition to sharing this notification with the Secretariat of ICCAT, EJF initially also shared it with the competent authorities of Belize, Brazil, Senegal, Trinidad and Tobago, the United States of America (USA) and VCT, and with the relevant services of the European Commission.

– *Vessel Information Alert of 16 June 2021*[3]

Our Vessel Information Alert (VIA) of 16 June 2021 transmitted to the Secretariat of ICCAT on 17 June 2021 aimed at informing the secretariat that intelligence indicated that three

[2] ICCAT, 'Recommendation by ICCAT on establishing a list of vessels presumed to have carried out illegal, unreported and unregulated fishing activities', accessed 7.10.2021, https://www.iccat.int/Documents/Recs/compendiopdf-e/2018-08-e.pdf.

[3] This Vessel Information Alert was shared with the Secretariat of ICCAT on 17 June 2021.

fishing vessels having potentially engaged in IUU fishing activities in the Atlantic Ocean had recently been included in the record of vessels currently authorised to operate in the Indian Ocean Tuna Commission (IOTC) area, reportedly under the flag of Oman. Based on information available, these three vessels were identified under the names of "ISRAR 1" (IMO: 8004076), "ISRAR 2" (IMO: 8568682, ex-RICOS NO. 3) and "ISRAR 3" (IMO: 8568694, ex-RICOS NO. 6). The vessels identified under the IMO numbers 8568682 and 8568694 are those concerned by the VANs of 16 October 2020 and 4 November 2020. In relation to those two vessels, EJF highlighted that it continued monitoring their whereabouts and gathering information on their identities and activities after 4 November 2020 and identified that they had travelled to the Indian Ocean and port areas within Mauritius which they entered, reportedly under their new identities, in December 2020. In respect of the third vessel – namely the "ISRAR 1" – EJF noted that it travelled to the Indian Ocean and port areas within Mauritius together with the two other vessels, and that it is not possible to exclude that it also operated in the area under competence of ICCAT based on human intelligence gathered by EJF and AIS data presumably transmitted by the vessel prior to it sailed to the Indian Ocean. In that regard, EJF noted that the ICCAT record of inactive vessels includes a vessel identified under a previous identity of the "ISRAR 1", i.e., under the name of "MEGA NO. 2" and IMO: 8004076. As such, EJF highlighted that further verifications by the relevant competent authorities could lead to establishing that the potential activities that the vessel may have undertaken in the Atlantic Ocean were not conducted in accordance with applicable conservation and management measures (CMMs). In addition to sharing this alert with the Secretariat of ICCAT, EJF also shared it with the competent authorities of Belize, France, Mauritius, Oman and the USA, and with the secretariats of all tuna regional fisheries management organisations (incl. of the IOTC) as well as with the relevant services of the European Commission and INTERPOL.

***

As previously mentioned, EJF believes that international information-sharing is key to enhance transparency in the fisheries sector and prevent, deter, and eliminate IUU fishing. Therefore, we appreciate that non-governmental organisations can submit reports on possible situation of non-compliance with ICCAT CMMs.

We hope that the information we have shared with the Secretariat of ICCAT will contribute to the organisation's efforts to address the issue of IUU fishing in the Convention area. Should you need any further information, please do not hesitate to contact me. Yours sincerely,

Steve Trent
Founder / Chief Executive Officer, EJF

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16 October 2020

Vessel Activity Notification

Potential illegal fishing activities in the area under the competence of ICCAT

Using the software ExactEarth and the Global Fishing Watch map of fishing activity, the Environmental Justice Foundation (EJF) regularly monitors fishing vessel activities, particularly in regions with high levels of illegal, unreported and unregulated (IUU) fishing. ExactEarth and Global Fishing Watch are satellite-based tracking systems that allow for the observation of vessels equipped with an Automatic Identification System (AIS).

AIS data indicate that two fishing vessels reportedly flying the flag of Saint Vincent and the Grenadines (VCT) may potentially have engaged in fishing in the area under the competence of the International Commission for the Conservation of Atlantic Tunas (ICCAT) while not on the ICCAT record of vessels.

Vessels information

Name	Former name[1]	IMO	IRCS	MMSI	Vessel type	Reported length overall	Flag	Former flag[1]
RICOS NO. 3	MARIO NO. 3	8568682	J8QK5	377907277	Fishing vessel (longliner)	23,8 metres	VCT 	Tanzania 
RICOS NO. 6	MARIO NO. 6	8568694	J8QK4	377907276	Fishing vessel (longliner)	23,8 metres	VCT 	Tanzania 

Legal person acting as registered owner of the vessels	National registration number	IMO company number	Place of registration
GREAT VISION CO., LTD.	83929	4288881	Belize 

[1] Based on information available from the sources used to compile this notification, the vessels would have changed names and flags in December 2015.

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The above tables reflect information gathered from the following sources:

- IMO Global Integrated Shipping Information System[2];
- IHS Maritime Portal Sea-web Ships[3]; and
- ExactEarth ShipView[4];
- Historical record of authorised vessels of the Indian Ocean Tuna Commission (IOTC)[5,6]; and
- Belize International Business Companies Registry[7].

Vessels activities

AIS data accessed on 7 October 2020 from the software ExactEarth indicate that the vessels concerned by this Vessel Activity Notification (VAN) may potentially have engaged in fishing in Western Central Atlantic (FAO 31) and Eastern Central Atlantic (FAO 34) from July 2020 onwards[8].

EJF believes that the AIS signals transmitted from the high seas of FAO 31 and FAO 34 may be consistent with fishing activities targeting tuna, tuna-like fishes and such other species of fishes exploited in tuna fishing (based on movements, speed and location)[9]. As such, these activities may fall under the competence of ICCAT.

EJF particularly notes that the AIS signals transmitted are suggestive of longlining activities with identifiable patterns of lines being set at or close to steaming speed and later hauled at lower speed[10]. EJF also notes that the signals were transmitted from known longline fishing grounds for tuna and tuna-like species[11].

This hypothesis is further reinforced by the type of vessels concerned by this VAN which were listed on the record of vessels authorised to operate in the area of competence of the Indian Ocean Tuna Commission as longliners until 12 August 2014[5,6].

At the time of writing this VAN, the last AIS signal available from ExactEarth transmitted by the RICOS NO. 3 was on 2 October 2020 (19:10:42 UTC) at 10.376023, -22.262262 in the high seas (FAO 34) at a reported speed of 0.4kn. The last AIS signal available from ExactEarth transmitted by the RICOS NO. 6 was on 26 September 2020 (21:13:44 UTC) at 10.035003, -21.252273 in the high seas (FAO 34) at a reported speed of 0.2kn.

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[2] IMO, 'Global Integrated Shipping Information System – Ship and Company Particulars', accessed 7.10.2020, https://gisis.imo.org/Public/Default.aspx (credentials required, free of charge).
[3] IHS Maritime Portal – Sea-web Ships, accessed 7.10.2020, https://maritime.ihs.com/Home/Index (subscription required).
[4] ExactEarth ShipView, accessed 7.10.2020, https://shipview.exactearth.com (subscription required).
[5] IOTC, 'Historical record of authorised vessels – Vessel information', accessed 7.10.2020, https://www.iotc.org/vessels/history/69046/8352.
[6] IOTC, 'Historical record of authorised vessels – Vessel information', accessed 7.10.2020, https://www.iotc.org/vessels/history/69048/8353.
[7] IBC Belize, accessed 7.10.2020, https://companysearch.bz/public_search/index.php.
[8] The first AIS signals transmitted by the RICOS NO. 3 and RICOS NO. 6 available from the software ExactEarth are dated 9 July 2020.
[9] See **Appendix 1** for an example of close-up of AIS signals available from the software ExactEarth.
[10] de Souza EN, Boerder K, Matwin S, Worm B (2016) *Improving Fishing Pattern Detection from Satellite AIS Using Data Mining and Machine Learning, PLoS ONE 11(7): e0158248*, https://doi.org/10.1371/journal.pone.0158248.
[11] ICCAT (2019) *Statistical Bulletin, Vol. 45 (1950-2017), Section 4, Geographical distribution of historical catches of the major tuna and tuna-like species by decade, species and gear group*, https://www.iccat.int/sbull/SB45-2019/s4.html.

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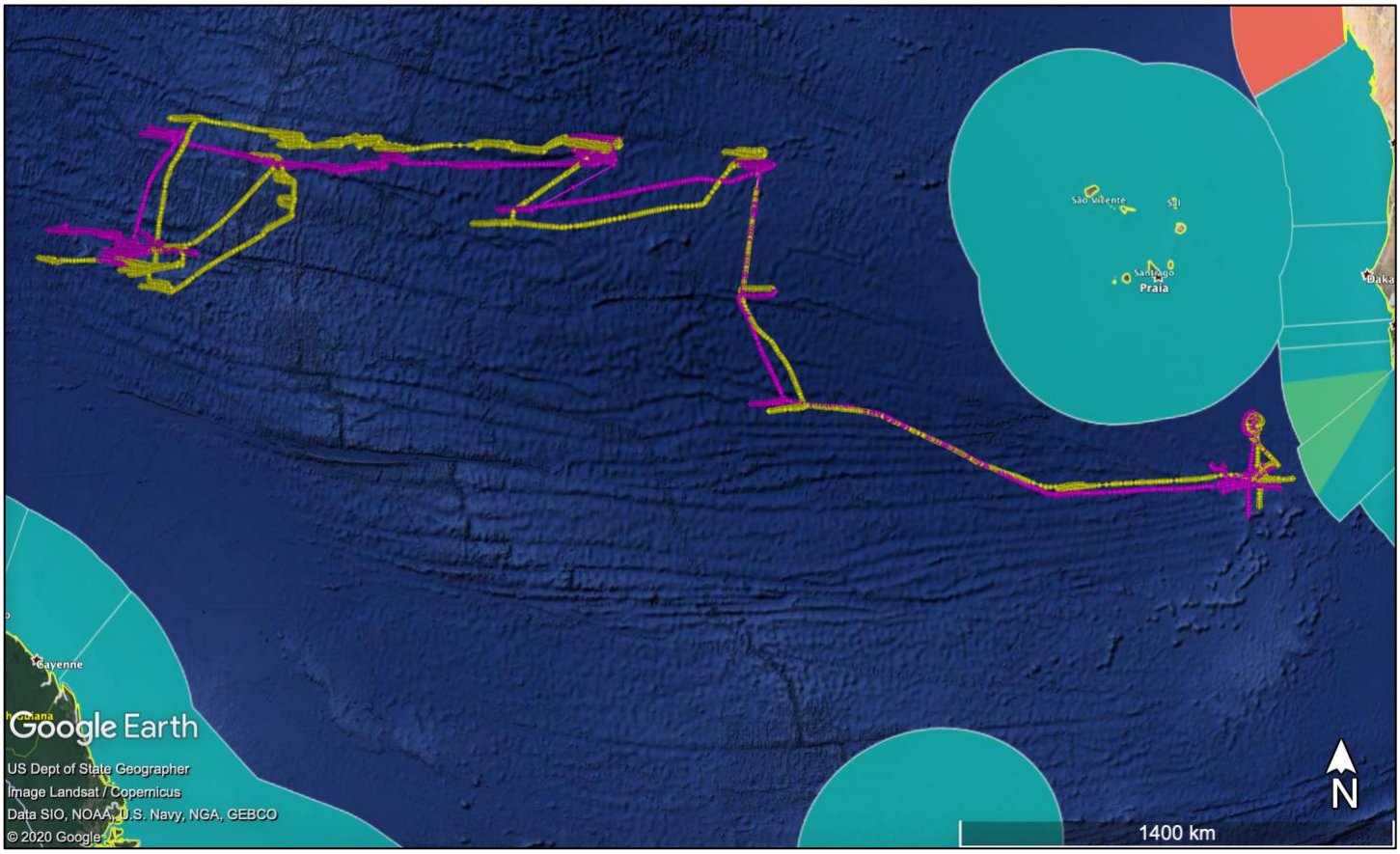

Tracks of the vessels available from ExactEarth plotted on Google Earth. Tracks are available upon request. The maritime zones and maritime delimitations depicted in the image are purely illustrative.

The track in magenta in the image above is based on AIS signals transmitted by the vessel RICOS NO. 3. The track in yellow in the image is based on those transmitted by the vessel RICOS NO. 6.

Although the software ExactEarth provides limited historical data, EJF notes that additional historical data for the vessels is available from the Global Fishing Watch platform[12]. AIS data accessed from that platform indicate that the vessels concerned by this VAN transmitted AIS signals from the Atlantic at least from, respectively, January 2018 (RICOS NO. 3) and January 2019 (RICOS NO. 6).

During that period and based on data available from the Global Fishing Watch platform, the vessels are believed to have entered within the port areas of:

- RICOS NO. 3: Dakar, Senegal and Port of Spain, Trinidad and Tobago.
- RICOS NO. 6: Port of Spain, Trinidad and Tobago.

[12] Global Fishing Watch, accessed 7.10.2020, https://globalfishingwatch.org.

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Potential breaches to ICCAT rules

In accordance with paragraph 1 of ICCAT Recommendation 13-13, this regional fisheries management organisation "shall establish and maintain an ICCAT record of fishing vessels 20 metres in length overall or greater […] authorised to fish for tuna and tuna-like species in the Convention Area".

For the purpose of this conservation and management measure (CMM), fishing vessels "not entered into the record are deemed not to be authorised to fish for, retain on board, transship or land tuna and tuna-like species"[13].

As previously mentioned, EJF found that the vessels RICOS NO. 3 and RICOS NO. 6, although reported to be greater than 20 metres in length overall, may not be included in the ICCAT's record of vessels currently available from the regional fisheries management organisation website[14] (see **Appendix 2**).

In addition, the vessels could not be found on any of the other lists published on the regional fisheries management organisation website (i.e. Active Vessels List, Inactive Vessels List and Inoperative Vessels List)[14].

Upon further investigation, should the activities described in this notification have taken place, they may fall under paragraph 1(a) of ICCAT Recommendation 18-08 which provides that: "vessels […], are presumed to have carried out [IUU] fishing activities in the ICCAT […], inter alia, when […] such vessels harvest tuna and tuna-like species in the Convention Area and are not registered on the relevant ICCAT list of vessels authorised to fish for tuna and tuna-like species in the ICCAT Convention Area"[15].

Alleged activity	Possibly infringed CMMs
Engaging in fishing activities in ICCAT while not in ICCAT's record of vessel	Paragraph 1(a) of ICCAT Recommendation 18-08

Recommendations

EJF recommends that **Saint Vincent and the Grenadines**:

1. Clarifies the situation of the vessels concerned by this notification vis-à-vis ICCAT.
2. Ascertains the nature of their activities – particularly from 9 July 2020 onwards – using all possible means (e.g. VMS data, logbook data, observer reports, cooperation with the relevant port states, etc.).
3. If the vessels were found to have engaged in fishing activities, ascertains whether or not these activities

[13] ICCAT, 'Recommendation by ICCAT concerning the Establishment of an ICCAT Record of Vessels 20 Metres in Length Overall or Greater Authorized to Operate in the Convention Area', accessed 7.10.2020, https://www.iccat.int/Documents/Recs/compendiopdf-e/2013-13-e.pdf.
[14] ICCAT, 'ICCAT Record of Vessels', accessed 7.10.2020, https://www.iccat.int/en/VesselsRecord.asp.
[15] ICCAT, 'Recommendation by ICCAT on Establishing a List of Vessels presumed to have Carried out Illegal, Unreported and Unregulated Fishing Activities', accessed 7.10.2020, https://www.iccat.int/Documents/Recs/compendiopdf-e/2018-08-e.pdf.

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were conducted in accordance with all relevant international, regional and national CMMs.
4. If the vessels were found to have operated in breach of the applicable CMMs or any other applicable rules, takes appropriate enforcement action.

EJF recommends that **Belize**:

1. Verifies, through inter-agency cooperation, the status of the legal person allegedly acting as registered owner of the vessels concerned by this notification (e.g. company status and type, date of incorporation nature of business, registered location, beneficial ownership structure, etc.).
2. Be prepared to engage in cooperation with the flag state of the vessels to stay abreast of the findings of the verifications this notification may trigger and to support its authorities in this context.
3. If the vessels were found to have engaged in IUU fishing activities, takes appropriate enforcement action vis-à-vis any of its nationals having supported or engaged in such activities, including as registered owners.
4. Should the above be the case and the registered owner of the vessels concerned by this notification be beneficially owned by natural or legal persons located outside Belize, cooperates and shares information with the relevant countries.

EJF recommends that the **Secretariat of ICCAT**:

1. Considers this information under Recommendation 08-09[16].
2. Confirms that the fishing vessels concerned by this notification were not included in its record of vessels for the periods mentioned in this notification – particularly from 9 July 2020 onwards – and whether or not the potential fishing activities would have, in this context, been conducted in accordance with the relevant CMMs.
3. Contacts the flag state of the vessels concerned by this notification to seek clarification on their status and the nature of their potential activities vis-à-vis ICCAT as well as to stay abreast of the findings of the verifications this notification may trigger.
4. If evidenced that the fishing activities described in this notification were not conducted in accordance with the relevant CMMs, considers this information, together with any other relevant information contained in this notification, under Recommendation 18-08 and other relevant ICCAT recommendations.

EJF recommends that the **European Commission**:

1. In accordance with Article 49(2) of Council Regulation (EC) No 1005/2008, considers the information contained in this notification in the context of the implementation of this Council Regulation, in particular in the context of the demarches the European Commission initiated vis-à-vis the flag state of

[16] ICCAT, 'Recommendation by ICCAT to establish a process for the review and reporting of compliance information', accessed 8.10.2020, https://www.iccat.int/Documents/Recs/compendiopdf-e/2008-09-e.pdf.

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the vessels under Article 31 of Council Regulation (EC) No 1005/2008[17] and in the context of the membership of the European Union to ICCAT.

[17] EUR-Lex, 30.5.2020, 'Commission Implementing Decision (EU) 2017/918 of 23 May 2017 identifying Saint Vincent and the Grenadines as a non-cooperating third country in fighting illegal, unreported and unregulated fishing', accessed 8.10.2020, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32017D0918.

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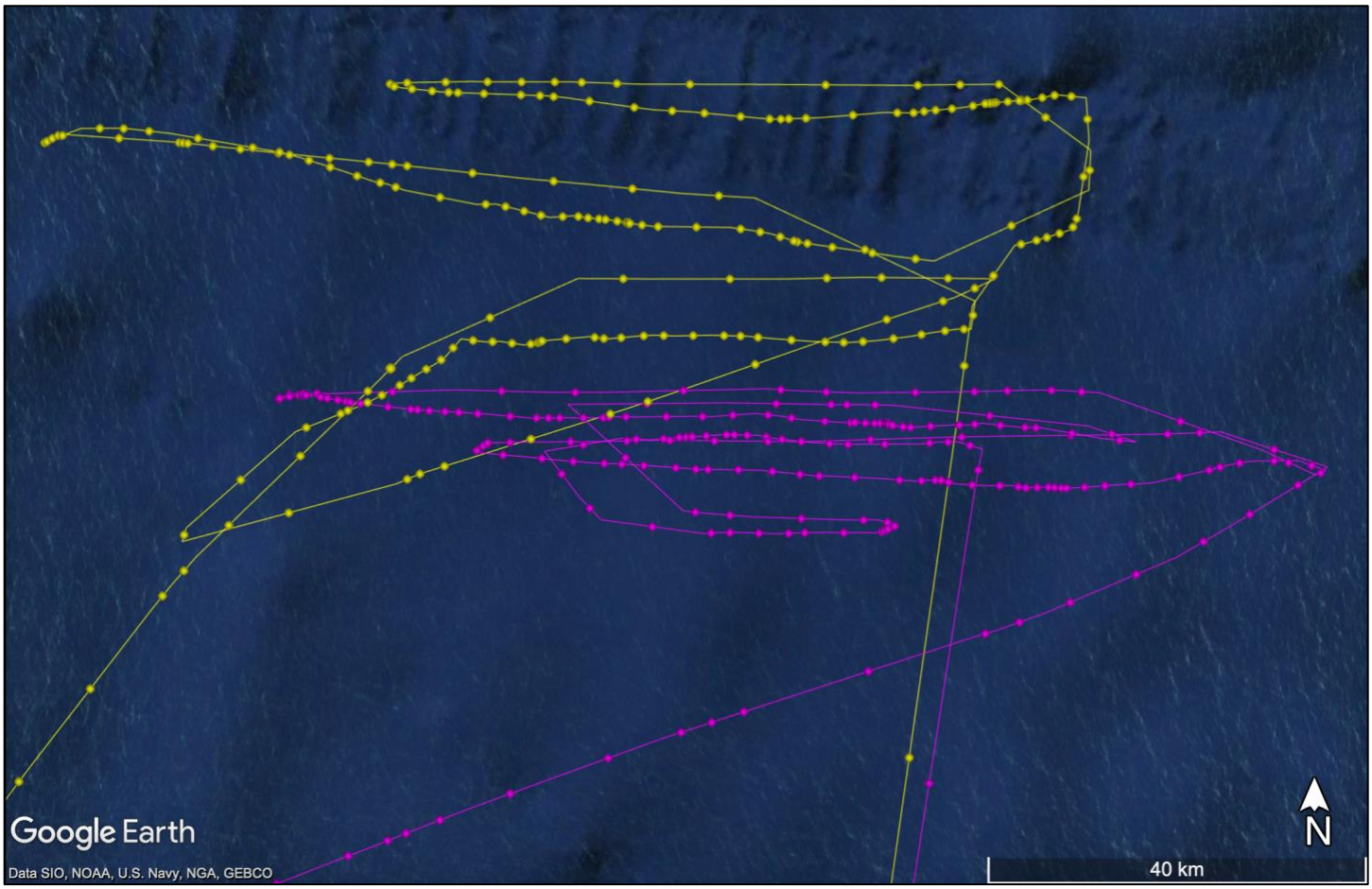
Appendix 1 – Close-up example of the vessels' tracks



Close-up of the tracks of the vessels between 28 August (21:41:52 UTC) and 1 September 2020 (08:36:41 UTC) available from ExactEarth plotted on Google Earth.

The track in magenta in the image is based on AIS signals transmitted by the vessel RICOS NO. 3. The track in yellow in the image is based on those transmitted by the vessel RICOS NO. 6.

The movements depicted in the image are suggestive of longlining activities. Over the period, the vessels' average reported speeds were, respectively, of 3.9kn (RICOS NO. 3) and 5.7kn (RICOS NO. 6).

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Appendix 2 – Information available from the ICCAT's record of vessels currently available for Saint Vincent and the Grenadines

Results of search

Home / MCS / Vessels Record

Authorization date in force: X
Authorization date expired: X

Order by : Vessel Name
Export to Excel this Selection

Reporting Flag: St. Vincent and Grenadines

Records 1 to 4 of 4

ICCAT SerialNo	Flag VessCode	Flag ChartTo	IRCS	NatRegNo	VesselName	IntRegNo	IRNo TypeCode	LOAm	Tonnage	Ton Type	20 m	SWO n	SWO s	ALB n	ALB s	TROP	SWO m	ALB m	BFT c	BFT o	Carr
AT000VCT00053	VCT	NAM	J8QJ6	400959	DAE SUNG 216	8976114	IMO	49.97	646	GRT	X	X	X	X	X	X					
AT000VCT00052	VCT	NAM	J8QJ7	400958	DAE SUNG 226	8744042	IMO	49.97	646	GRT	X	X	X	X	X	X					
AT000VCT00054	VCT	NAM	J8QK8	400969	DAE YOUNG 111	8619340	IMO	47.21	379	GRT	X	X	X	X	X	X					
AT000VCT00055	VCT	NAM	J8QK7	400970	DAE YOUNG 112	8619390	IMO	47.21	379	GRT	X	X	X	X	X	X					

Source: ICCAT, 'ICCAT Record of Vessels', accessed 7.10.2020, https://www.iccat.int/en/VesselsRecord.asp.

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4 November 2020

Vessel Activity Notification
UPDATE

Potential illegal fishing activities in the area under the competence of ICCAT

Using the software ExactEarth and the Global Fishing Watch (GFW) map of fishing activity, the Environmental Justice Foundation (EJF) regularly monitors fishing vessel activities, particularly in regions with high levels of illegal, unreported and unregulated (IUU) fishing. ExactEarth and GFW are satellite-based tracking systems that allow for the observation of vessels equipped with an Automatic Identification System (AIS).

AIS data indicate that two fishing vessels reportedly flying the flag of Saint Vincent and the Grenadines (VCT) may potentially have engaged in fishing in the area under the competence of the International Commission for the Conservation of Atlantic Tunas (ICCAT) while not on the ICCAT record of vessels.

This Vessel Activity Notification (VAN) is an update of a notification dated 16 October 2020. It includes information shared by the Fisheries Division of the Ministry of Agriculture, Forestry, Fisheries, Rural Transformation, Industry and Labour of VCT on 21 October 2020 in response to the initial version of the VAN.

Sections of the initial version of the VAN that have been substantially updated have been framed. The tables included in the sections 'Vessels information' and 'Potential breaches to ICCAT rules' have also been updated to reflect the information received from the Fisheries Division of VCT. Three appendices have been added (**Appendix 1**, **Appendix 3** and **Appendix 4**).

Vessels information

Latest known name	Former name	IMO	Latest known IRCS	Latest known MMSI	Vessel type	Reported length overall	Current flag	Latest known flag
RICOS NO. 3	MARIO NO. 3	8568682	J8QK5	377907277	Fishing vessel (longliner)	23,8 metres	Unknown	VCT 
RICOS NO. 6	MARIO NO. 6	8568694	J8QK4	377907276	Fishing vessel (longliner)	23,8 metres	Unknown	VCT 

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Latest known legal person acting as registered owner of the vessels	National registration number	IMO company number	Place of registration
GREAT VISION CO., LTD.	83929	4288881	Belize 

The above tables reflect information gathered from the following sources:

- IMO Global Integrated Shipping Information System[1];
- IHS Maritime Portal Sea-web Ships[2];
- ExactEarth ShipView[3];
- Historical record of authorised vessels of the Indian Ocean Tuna Commission (IOTC)[4,5];
- Belize International Business Companies Registry[6]; and
- Fisheries Division of the Ministry of Agriculture, Forestry, Fisheries, Rural Transformation, Industry and Labour of VCT[7].

In reaction to EJF's initial VAN, the Fisheries Division of the Ministry of Agriculture, Forestry, Fisheries, Rural Transformation, Industry and Labour of VCT replied on 21 October 2020 that the vessels concerned had been deregistered from VCT on 13 September 2018. The Fisheries Division shared with EJF the deletion certificates issued by the Maritime Administration of VCT (see **Appendix 1**). EJF notes that the deletion certificates do not mention any date relating to when they were issued.

The status of the vessels after 13 September 2018 is unknown to EJF. There is a possibility that they are or were without nationality and may have continued to claim the flag of VCT.

Vessels activities

AIS data accessed on 7 October 2020 from the software ExactEarth indicate that the vessels concerned by this VAN may potentially have engaged in fishing in Western Central Atlantic (FAO 31) and Eastern Central Atlantic (FAO 34) from July 2020 onwards[8].

[1] IMO, 'Global Integrated Shipping Information System – Ship and Company Particulars', accessed 7.10.2020, https://gisis.imo.org/Public/Default.aspx (credentials required, free of charge).
[2] IHS Maritime Portal – Sea-web Ships, accessed 7.10.2020, https://maritime.ihs.com/Home/Index (subscription required).
[3] ExactEarth ShipView, accessed 7.10.2020, https://shipview.exactearth.com (subscription required).
[4] IOTC, 'Historical record of authorised vessels – Vessel information', accessed 7.10.2020, https://www.iotc.org/vessels/history/69046/8352.
[5] IOTC, 'Historical record of authorised vessels – Vessel information', accessed 7.10.2020, https://www.iotc.org/vessels/history/69048/8353.
[6] IBC Belize, accessed 7.10.2020, https://companysearch.bz/public_search/index.php.
[7] The tables have been updated to reflect the information received from the Fisheries Division of VCT. EJF notes that this information corroborates most of the initial findings (i.e. former names, IRCS, types, reported length, former flag (Tanzania – which has not been included in the updated version of the VAN).
[8] The first AIS signals transmitted by the RICOS NO. 3 and RICOS NO. 6 available from the software ExactEarth are dated 9 July 2020.

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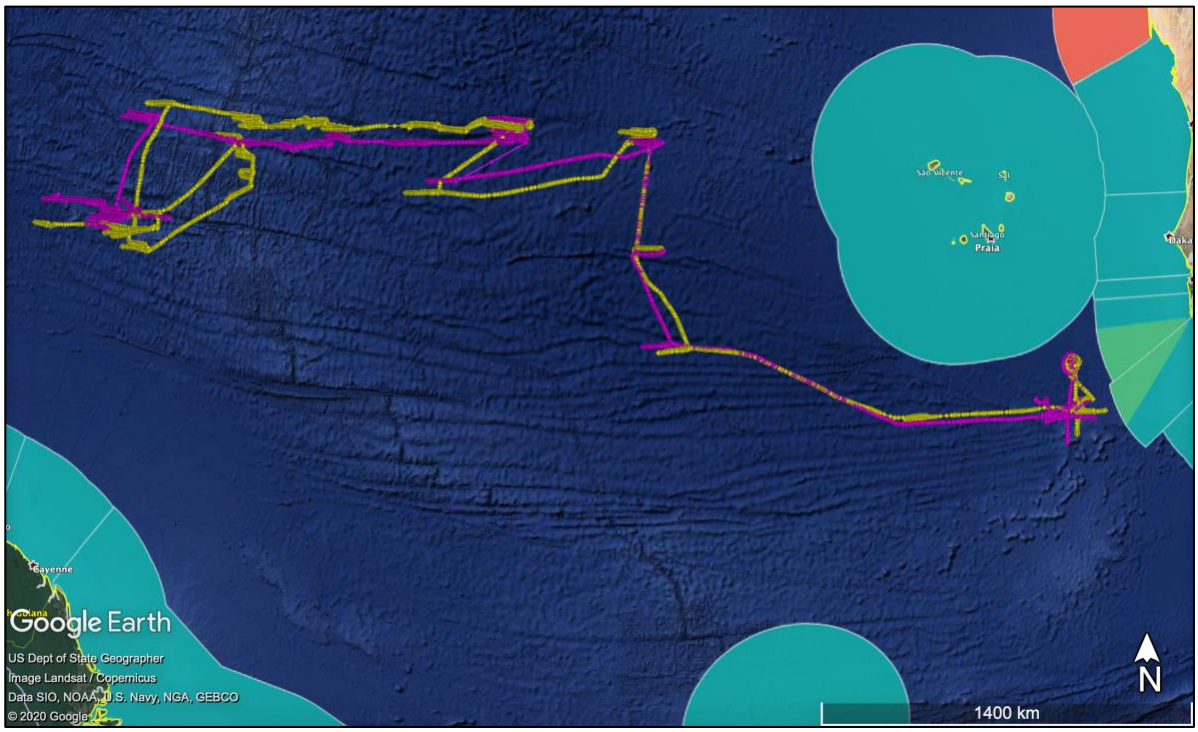
EJF believes that the AIS signals transmitted from the high seas of FAO 31 and FAO 34 may be consistent with fishing activities targeting tuna, tuna-like fishes and such other species of fishes exploited in tuna fishing (based on movements, speed and location)[9]. As such, these activities may fall under the competence of ICCAT.

EJF particularly notes that the AIS signals transmitted are suggestive of longlining activities with identifiable patterns of lines being set at or close to steaming speed and later hauled at lower speed[10]. EJF also notes that the signals were transmitted from known longline fishing grounds for tuna and tuna-like species[11].

This hypothesis is further reinforced by the type of vessels concerned by this VAN which were listed on the record of vessels authorised to operate in the area of competence of the Indian Ocean Tuna Commission as longliners until 12 August 2014[5,6].

At the time of writing this VAN and its update, the last AIS signal available from ExactEarth transmitted by the RICOS NO. 3 was on 2 October 2020 (19:10:42 UTC) at 10.376023, -22.262262 in the high seas (FAO 34) at a reported speed of 0.4kn. The last AIS signal available transmitted by the RICOS NO. 6 was on 26 September 2020 (21:13:44 UTC) at 10.035003, -21.252273 in the high seas (FAO 34) at a reported speed of 0.2kn.



Tracks of the vessels available from ExactEarth plotted on Google Earth. Tracks are available upon request. The maritime zones and maritime delimitations depicted in the image are purely illustrative.

[9] See **Appendix 2** for a close-up example of AIS signals available from the software ExactEarth.
[10] de Souza EN, Boerder K, Matwin S, Worm B (2016) *Improving Fishing Pattern Detection from Satellite AIS Using Data Mining and Machine Learning, PLoS ONE 11(7): e0158248*, https://doi.org/10.1371/journal.pone.0158248.
[11] ICCAT (2019) *Statistical Bulletin, Vol. 45 (1950-2017), Section 4, Geographical distribution of historical catches of the major tuna and tuna-like species by decade, species and gear group*, https://www.iccat.int/sbull/SB45-2019/s4.html.

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The track in magenta in the image above is based on AIS signals transmitted by the vessel RICOS NO. 3. The track in yellow in the image is based on those transmitted by the vessel RICOS NO. 6.

Although the software ExactEarth provides limited historical data, EJF notes that additional historical data for the vessels is available from GFW[12]. AIS data accessed from that platform indicate that the vessels concerned by this VAN transmitted AIS signals from the Atlantic at least from, respectively, January 2018 (RICOS NO. 3) and January 2019 (RICOS NO. 6).

During that period and based on data available from the GFW platform, the vessels are believed to have entered within the port areas of:

- RICOS NO. 3: Dakar, Senegal and Port of Spain, Trinidad and Tobago.
- RICOS NO. 6: Port of Spain, Trinidad and Tobago.

In respect of the above and based on data available from the GFW platform, EJF notes that the vessel RICOS NO. 3 could have been present in the vicinity of the port of Dakar, Senegal approximately between 18 September 2018 and 20 October 2018 and that the vessels RICOS NO. 3 and RICOS NO. 6 could have been present within port areas of Port of Spain, Trinidad and Tobago approximately between 8 September 2019 and 28 October 2019 (i.e. after their deletion from the registry of VCT)[13].

On another note, further analysis of the AIS data accessed from ExactEarth indicates that the vessels could have transmitted AIS signals from the exclusive economic zone (EEZ) of Brazil on multiple occasions between December 2019 and February 2020[14].

EJF notes that the AIS signals transmitted from the EEZ of Brazil are suggestive of longlining activities. The AIS signals transmitted by the vessels indicate that incursions by the vessel RICOS NO. 3 could have gone farther within the EEZ of Brazil (up to approximately 20nm) than those relating to the vessel RICOS NO. 6.

EJF could not determine whether or not the fishing vessels were authorised to operate within the EEZ of Brazil by the competent authorities.

[12] Global Fishing Watch, accessed 7.10.2020, https://globalfishingwatch.org.
[13] **Appendix 3** contains information retrieved from ship directory of the website of the port of Dakar on 22 October 2020. As depicted in the image and though the information available is limited, both the RICOS NO. 3 and RICOS NO. 6 can apparently be found from the ship directory.
[14] See **Appendix 4** for close-up examples of AIS signals presumably transmitted from within the EEZ of Brazil available from the Global Fishing Watch platform.

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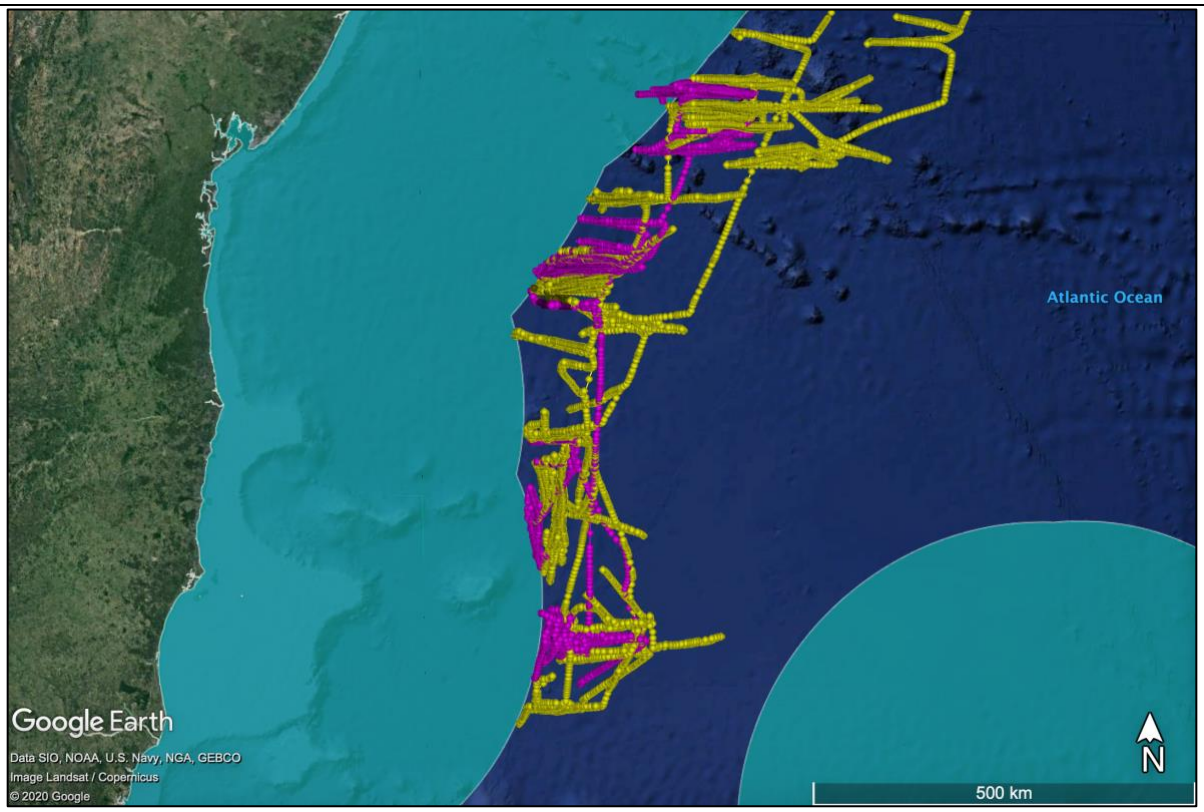

Tracks of the vessels within and around the EEZ of Brazil available from ExactEarth plotted on Google Earth. Tracks are available upon request. The maritime zones and maritime delimitations depicted in the image are purely illustrative.

The track in magenta in the image above is based on AIS signals transmitted by the vessel RICOS NO. 3. The track in yellow in the image is based on those transmitted by the vessel RICOS NO. 6.

Potential breaches to ICCAT rules

In accordance with paragraph 1 of ICCAT Recommendation 13-13, this regional fisheries management organisation "shall establish and maintain an ICCAT record of fishing vessels 20 metres in length overall or greater […] authorised to fish for tuna and tuna-like species in the Convention Area".

For the purpose of this conservation and management measure (CMM), fishing vessels "not entered into the record are deemed not to be authorised to fish for, retain on board, transship or land tuna and tuna-like species"[15].

[15] ICCAT, 'Recommendation by ICCAT concerning the Establishment of an ICCAT Record of Vessels 20 Metres in Length Overall or Greater Authorized to Operate in the Convention Area', accessed 7.10.2020, https://www.iccat.int/Documents/Recs/compendiopdf-e/2013-13-e.pdf.

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As previously mentioned, EJF found that the vessels RICOS NO. 3 and RICOS NO. 6, although reported to be greater than 20 metres in length overall, may not be included in the ICCAT's record of vessels currently available from the regional fisheries management organisation website[16] (see **Appendix 5**).

In addition, the vessels could not be found on any of the other lists published on the regional fisheries management organisation website (i.e. Active Vessels List, Inactive Vessels List and Inoperative Vessels List)[14].

Upon further investigation, should the activities described in this notification have taken place, they may fall under paragraph 1(a) of ICCAT Recommendation 18-08 which provides that: "vessels […], are presumed to have carried out [IUU] fishing activities in the ICCAT […], inter alia, when […] such vessels harvest tuna and tuna-like species in the Convention Area and are not registered on the relevant ICCAT list of vessels authorised to fish for tuna and tuna-like species in the ICCAT Convention Area"[17].

In addition, should incursions within the EEZ of Brazil be confirmed and should these operations not have been authorised, they may fall under 1(h) of ICCAT Recommendation 18-08 which provides that: "vessels […], are presumed to have carried out [IUU] fishing activities in the ICCAT […], inter alia, when […] such vessels harvest tuna or tuna-like species in the waters under the national jurisdiction of the coastal states in the Convention area without authorisation or infringe on that state's laws and regulations".

Finally, should the vessels have operated without nationality after their deletion from the registry of VCT (i.e. after 13 September 2018), their activities may fall under 1(i) of ICCAT Recommendation 18-08 which provides that: "vessels […], are presumed to have carried out [IUU] fishing activities in the ICCAT […], inter alia, when […] such vessels are without nationality and harvest tuna or tuna-like species in the ICCAT Convention area".

Alleged activity	Possibly infringed CMMs
Engaging in fishing activities in ICCAT while not in ICCAT's record of vessel	Paragraph 1(a) of ICCAT Recommendation 18-08
Harvest tuna or tuna-like species in the waters under the national jurisdiction of the coastal states in the Convention area without authorisation or infringe on that state's laws and regulations	Paragraph 1(h) of ICCAT Recommendation 18-08
Are without nationality and harvest tuna or tuna-like species in the ICCAT Convention area	Paragraph 1(i) of ICCAT Recommendation 18-08

[16] ICCAT, 'ICCAT Record of Vessels', accessed 7.10.2020, https://www.iccat.int/en/VesselsRecord.asp.
[17] ICCAT, 'Recommendation by ICCAT on Establishing a List of Vessels presumed to have Carried out Illegal, Unreported and Unregulated Fishing Activities', accessed 7.10.2020, https://www.iccat.int/Documents/Recs/compendiopdf-e/2018-08-e.pdf.

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Recommendations

EJF recommends that **Saint Vincent and the Grenadines**:

1. Clarifies the situation of the vessels concerned by this notification vis-à-vis ICCAT.
2. Ascertains the nature of their activities – particularly from 9 July 2020 onwards – using all possible means (e.g. VMS data, logbook data, observer reports, cooperation with the relevant port states, etc.).
3. If the vessels were found to have engaged in fishing activities, ascertains whether or not these activities were conducted in accordance with all relevant international, regional and national CMMs.
4. If the vessels were found to have operated in breach of the applicable CMMs or any other applicable rules, takes appropriate enforcement action.
5. Informs whether or not it has recorded to which flag(s) the vessels concerned by this notification have been exported after their deletion from its registry.

EJF recommends that **Belize**:

1. Verifies, through inter-agency cooperation, the status of the legal person allegedly acting as registered owner of the vessels concerned by this notification (e.g. company status and type, date of incorporation nature of business, registered location, beneficial ownership structure, etc.).
2. Be prepared to engage in cooperation with the relevant states to stay abreast of the findings of the verifications this notification may trigger and to support their authorities in this context.
3. If the vessels were found to have engaged in IUU fishing activities, takes appropriate enforcement action vis-à-vis any of its nationals having supported or engaged in such activities, including as registered owners.
4. Should the above be the case and the registered owner of the vessels concerned by this notification be beneficially owned by natural or legal persons located outside Belize, cooperates and shares information with the relevant countries.

EJF recommends that **Senegal** and **Trinidad and Tobago**:

1. Confirm that the vessels concerned by this notification have entered port areas under their jurisdiction after their deletion from the registry of Saint Vincent and the Grenadines (i.e. after 13 September 2018).
2. If so, verify and share information on the identity used by the vessels (i.e. names, flags, other particulars, ownership-related information, other in-country links (e.g. agents), etc.)
3. If so, verify and share information on the nature of their activities within their port areas (including cargo-related information (e.g. nature and origin/destination of the products, etc.)).

EJF recommends that **Brazil**:

1. Confirms whether or not the vessels concerned by this notification are known to have been operating within its EEZ – particularly during the periods mentioned in this notification – and whether or not

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they were authorised to do so.
2. If so, shares information on their identity (i.e. names, flags, other particulars, ownership-related information, etc.) and the nature of their activities.
3. If not, considers taking appropriate enforcement action.

EJF recommends that the **Secretariat of ICCAT**:

1. Considers this information under Recommendation 08-09[18].
2. Confirms that the fishing vessels concerned by this notification were not included in its record of vessels for the periods mentioned in this notification – particularly from 9 July 2020 onwards – and whether or not the potential fishing activities would have, in this context, been conducted in accordance with the relevant CMMs.
3. Stands ready to contact the relevant states concerned by this notification to seek clarification on the status of the vessels and the nature of their potential activities vis-à-vis ICCAT as well as to stay abreast of the findings of the verifications this notification may trigger.
4. If evidenced that the fishing activities described in this notification were not conducted in accordance with the relevant CMMs, considers this information, together with any other relevant information contained in this notification, under Recommendation 18-08 and other relevant ICCAT recommendations.

EJF recommends that the **United States**:

1. Considers this information in the context of the membership of the United States to ICCAT and for the purpose of risk management, particularly in light of possible similarities between the modus operandi of the vessels concerned notification and that of fishing vessels the United States is currently proposing for listing in ICCAT under Recommendation 18-08[19].

EJF recommends that the **European Commission**:

1. In accordance with Article 49(2) of Council Regulation (EC) No 1005/2008, considers the information contained in this notification in the context of the implementation of this Council Regulation and in the context of the membership of the European Union to ICCAT.

[18] ICCAT, 'Recommendation by ICCAT to establish a process for the review and reporting of compliance information', accessed 8.10.2020, https://www.iccat.int/Documents/Recs/compendiopdf-e/2008-09-e.pdf.
[19] ICCAT, '2020 Commission Documents. Recommendation 18-08: IUU list 2020. Draft list of vessels presumed to have carried out IUU fishing activities (Doc. No. PWG_405/2020)', accessed 26.10.2020, https://www.iccat.int/com2020/index.htm#en.

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EJF recommends that **all states**[20]:

1. Publish details of access agreements and lists of vessels licensed to fish within their waters.
2. Publish the lists of vessels registered to their flag and of their vessels authorised to fish outside their EEZ.
3. Ensure that information made publicly available is comprehensive, credible and kept up to date as well as easily accessible, and – where applicable – consistent with and feed into information made available through the FAO Global Record of Fishing Vessels, Refrigerated Transport Vessels and Supply Vessels[21].
4. Publish information about punishments handed out for IUU fishing and fisheries crimes.
5. Consider implementing EJF's principles for global transparency in the fishing industry which consist of ten simple measures that can play a pivotal role in the battle against IUU fishing and fisheries crimes[22].

[20] EJF (2020) *EJF's Charter for Transparency. Bringing the fisheries sector out of the shadows. How best to implement principles three and four of the Charter for Transparency*, https://ejfoundation.org/resources/downloads/Report_Principles-three-four-final.pdf.
[21] FAO, 'Global Record of Fishing Vessels, Refrigerated Transport Vessels and Supply Vessels', accessed 4.11.2020, http://www.fao.org/global-record/en/.
[22] EJF (2018) *The ten principles for global transparency*, https://ejfoundation.org/resources/downloads/EJF-Transparency-10-principles-final-1.pdf.

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Appendix 1 – Deletion certificates issued by Saint Vincent and the Grenadines

ST. VINCENT AND THE GRENADINES

MARITIME ADMINISTRATION

DELETION CERTIFICATE

Nr & Call Letters	Name of Ship	Year and Port of Registry
400967 / J8 QK5	RICOS NO.3 ex MARIO NO. 3	2015, KINGSTOWN

Previous port of Registry	Type of Ship
ZANZIBAR, TANZANIA	LONG LINER FISHING VESSEL

Where Built	When Built	Name and Address of Builders
TAIWAN	2002	SHING SHENG FA, BOAT BUILDING COMPANY, LTD, KAOHSIUNG

PARTICULARS OF TONNAGE

The tonnages of this ship in accordance with her Tonnage Certificate are:

GROSS TONNAGE	87
NET TONNAGE	42

PARTICULARS OF THE SHIP

Number of decks	2	Length	23.80 M
Number of masts	2	Breadth	05.40 M
Framework	FIBERGLASS	Moulded Depth	02.00 M

PARTICULARS OF THE ENGINES (IF ANY)

Nr of sets	Description of engines	Number of cylinders	Diameter(mm)	Length of Stroke (mm)	KW
1	2002 YANMAR DIESEL	6	160	200	760

Name and address of makers

YANMAR CO LTD, UMEDA GATE TOWER, 1-9 TSURUNOCHO, KITA-KU

Date	Name, Residence and Description of the Owner (s)	Shares	Recorded
23.02.2015	GREAT VISION CO LTD #35 BARRACK ROAD, 3RD FLOOR, BELIZE CITY BELIZE C.A	100%	17.03.2015

Deletion certificate of the fishing vessel RICOS NO. 3 presumably issued on 13 September 2018 by the Maritime Administration of VCT.

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ST. VINCENT AND THE GRENADINES

MARITIME ADMINISTRATION

DELETION CERTIFICATE

Nr & Call Letters	Name of Ship	Year and Port of Registry
400968 / J8 QK4	RICOS NO.6 ex MARIO NO. 6	2015, KINGSTOWN

Previous port of Registry	Type of Ship
ZANZIBAR, TANZANIA	LONG LINER FISHING VESSEL

Where Built	When Built	Name and Address of Builders
TAIWAN	2002	SHING SHENG FA, BOAT BUILDING COMPANY, LTD, KAOHSIUNG

PARTICULARS OF TONNAGE

The tonnages of this ship in accordance with her Tonnage Certificate are:

GROSS TONNAGE	87
NET TONNAGE	42

PARTICULARS OF THE SHIP

Number of decks	2	Length	23.80 M
Number of masts	2	Breadth	05.40 M
Framework	FIBERGLASS	Moulded Depth	02.00 M

PARTICULARS OF THE ENGINES (IF ANY)

Nr of sets	Description of engines	Number of cylinders	Diameter(mm)	Length of Stroke (mm)	KW
1	2002 YANMAR 6NY16A-ST DIESEL	6	160	200	760

Name and address of makers

YANMAR CO LTD, UMEDA GATE TOWER, 1-9 TSURUNOCHO, KITA-KU

Date	Name, Residence and Description of the Owner (s)	Shares	Recorded
23.02.2015	GREAT VISION CO LTD #35 BARRACK ROAD, 3RD FLOOR, BELIZE CITY BELIZE C.A	100%	17.03.2015

Deletion certificate of the fishing vessel RICOS NO. 6 presumably issued on 13 September 2018 by the Maritime Administration of VCT.

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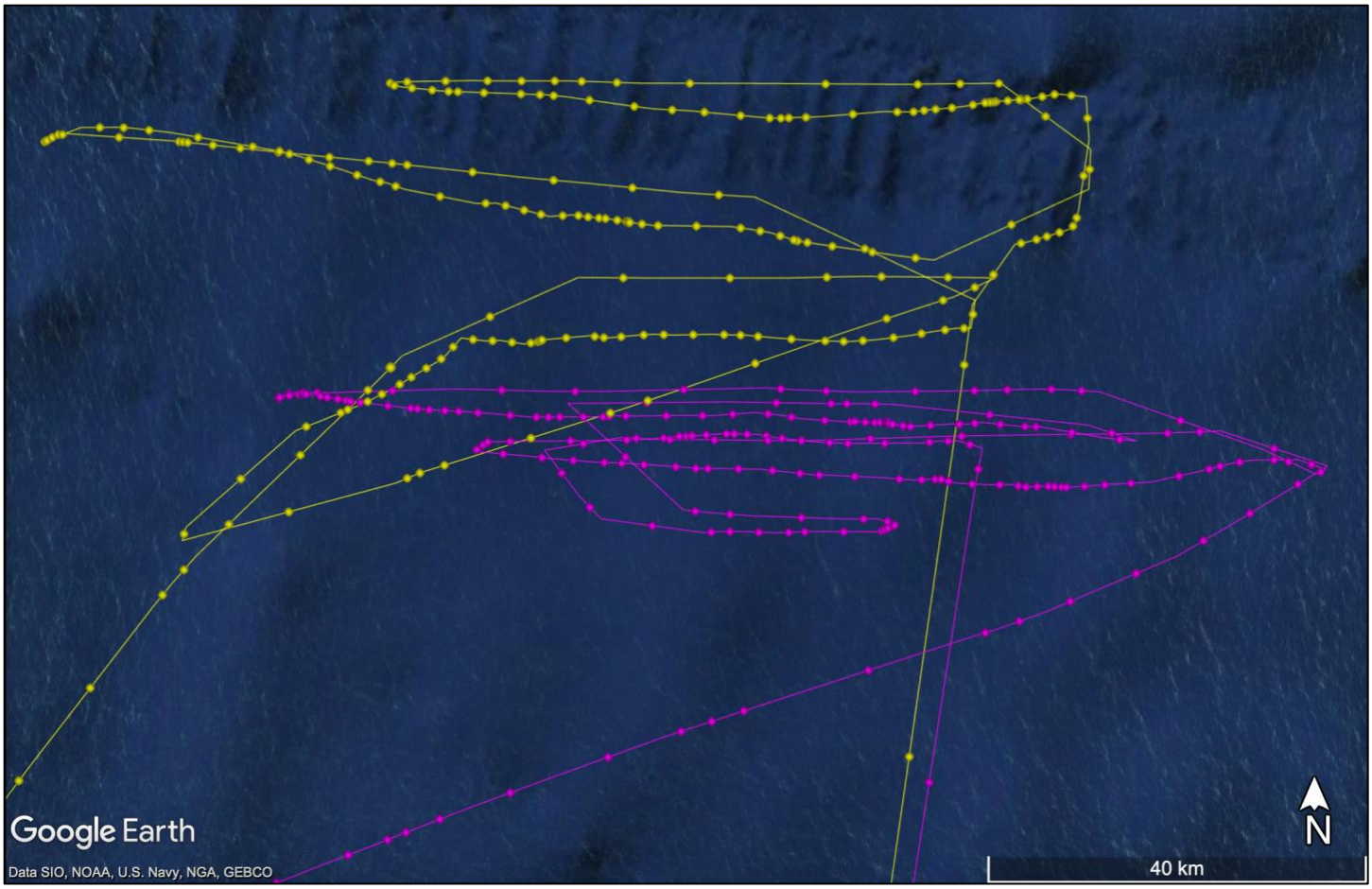
Appendix 2 – Close-up example of the vessels' tracks



Close-up of the tracks of the vessels between 28 August (21:41:52 UTC) and 1 September 2020 (08:36:41 UTC) available from ExactEarth plotted on Google Earth.

The track in magenta in the image is based on AIS signals transmitted by the vessel RICOS NO. 3. The track in yellow in the image is based on those transmitted by the vessel RICOS NO. 6.

The movements depicted in the image are suggestive of longlining activities. Over the period, the vessels' average reported speeds were, respectively, of 3.9kn (RICOS NO. 3) and 5.7kn (RICOS NO. 6).

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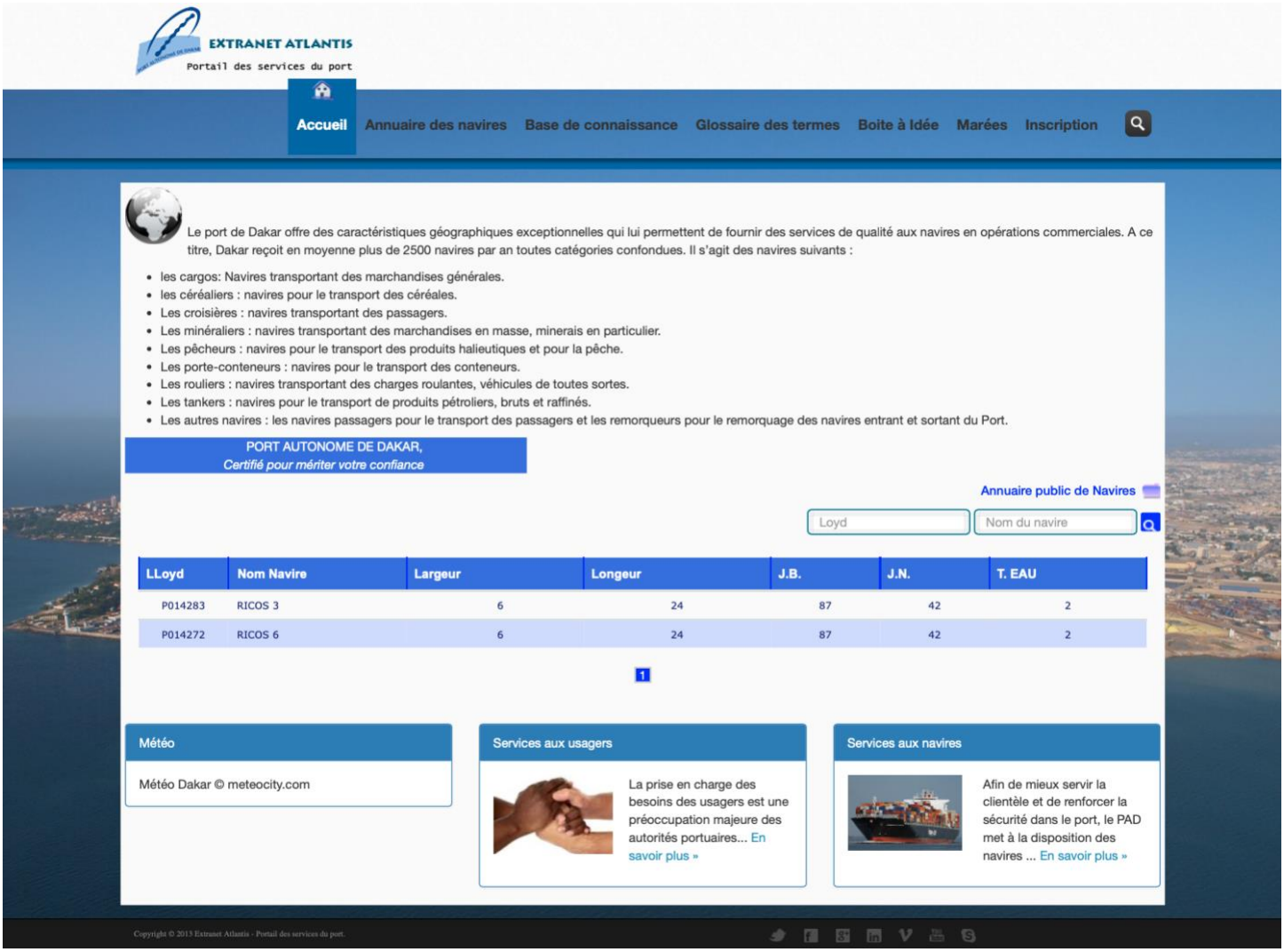
Appendix 3 – Information in relation to the vessels RICOS NO. 3 and RICOS NO. 6 available from the ship directory of the port of Dakar



Source: Port Autonome de Dakar, Extranet Atlantis, 'Annuaire des navires', accessed 22.10.2020, https://atlantis.portdakar.sn/extlisteAnnuairesNav.padpublic.

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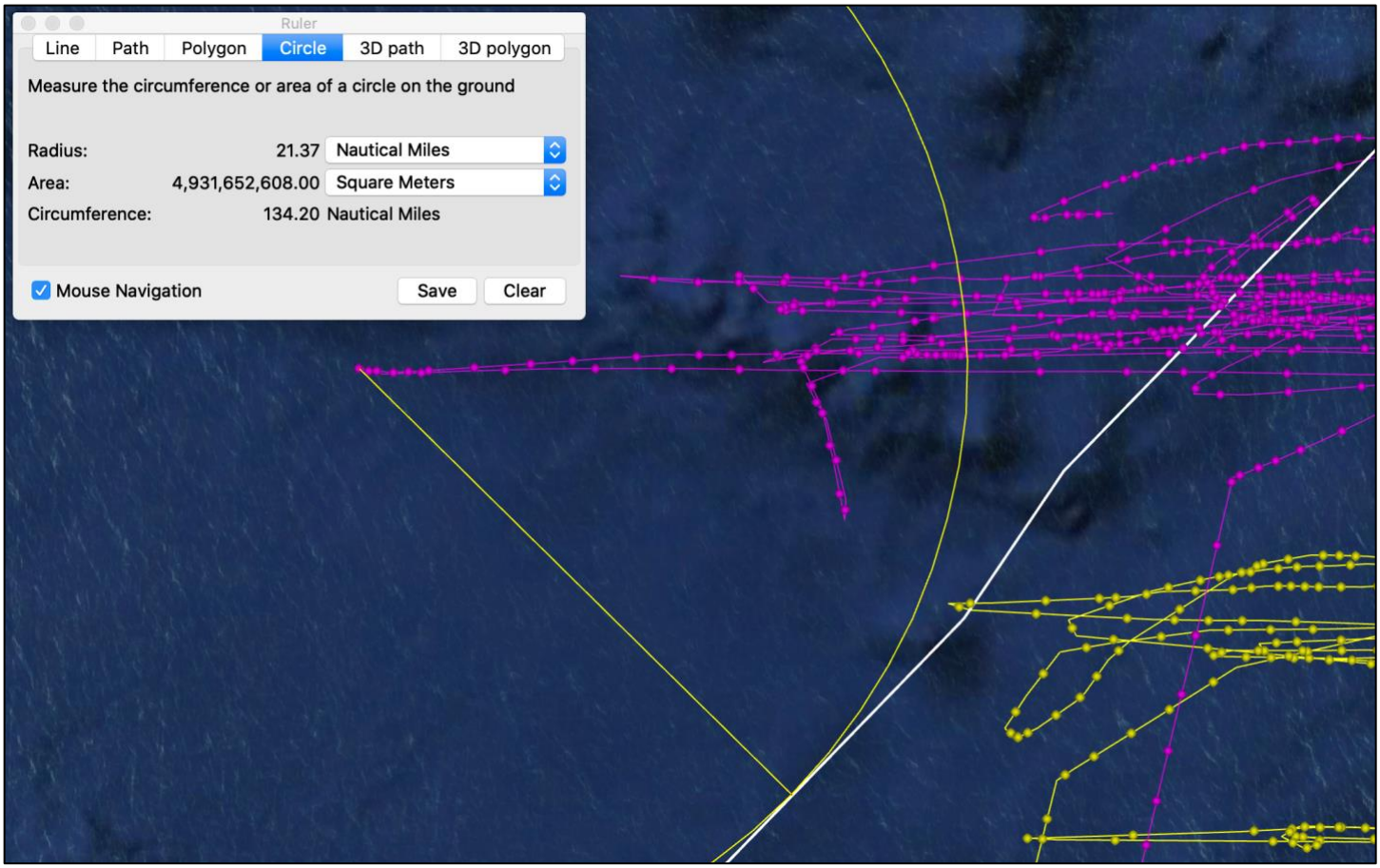
Appendix 4 – Close-up examples of the vessels' tracks depicting possible incursions within the EEZ of Brazil



Estimated distance (21.37nm) between an AIS signal transmitted by the vessel RICOS NO. 3 on 20 January 2020 (14:43:22; -12.470418, -34.087903; 3.7kn) and a line presumably depicting the outer limit of the EEZ of Brazil[23].

[23] The maritime zones and maritime delimitations depicted in the image are purely illustrative.

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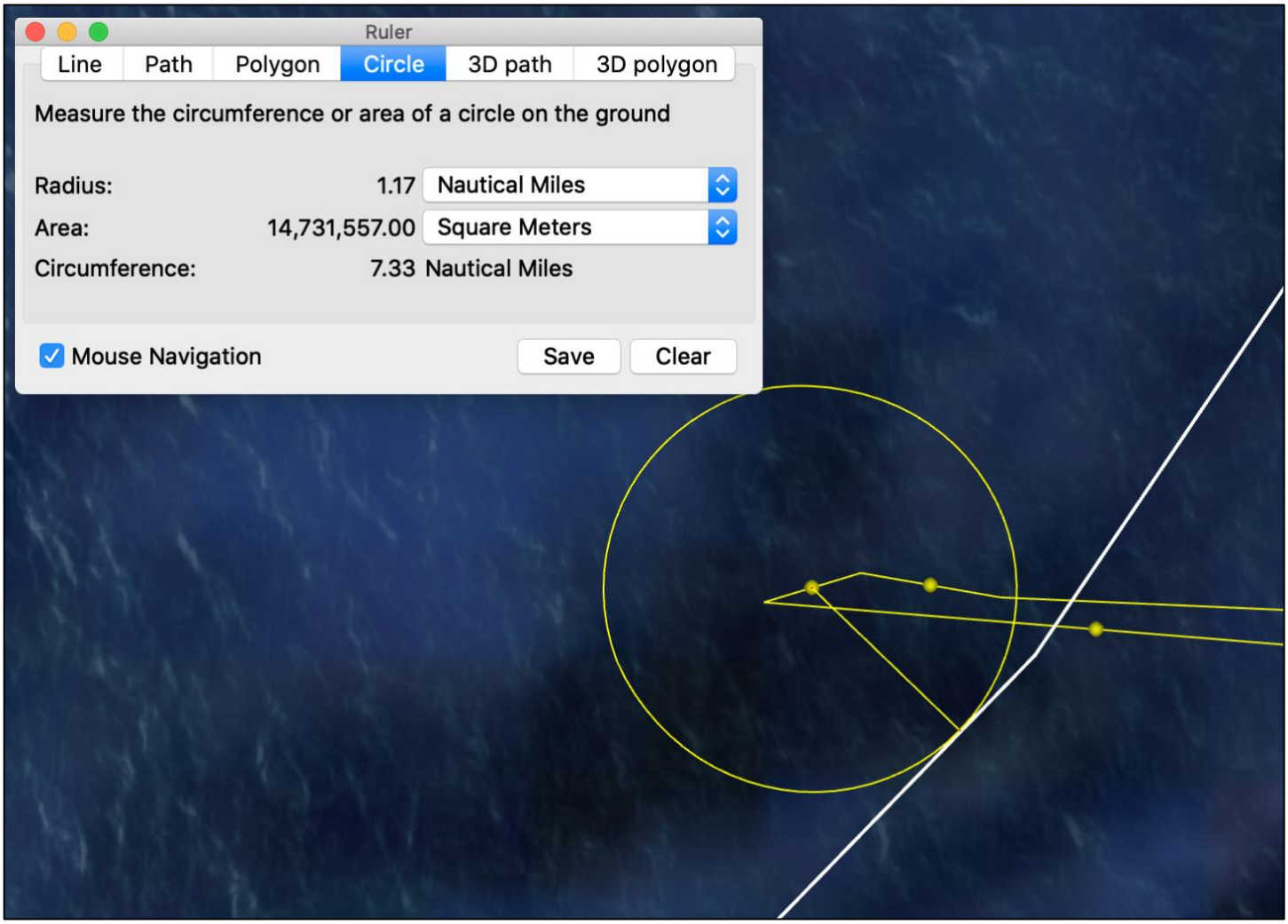

Estimated distance (1.17nm) between an AIS signal transmitted by the vessel RICOS NO. 6 on 1 February 2020 (14:35:21; -12.289755, -33.481658; 0.6kn) and a line presumably depicting the outer limit of the EEZ of Brazil[24].

[24] The maritime zones and maritime delimitations depicted in the image are purely illustrative.

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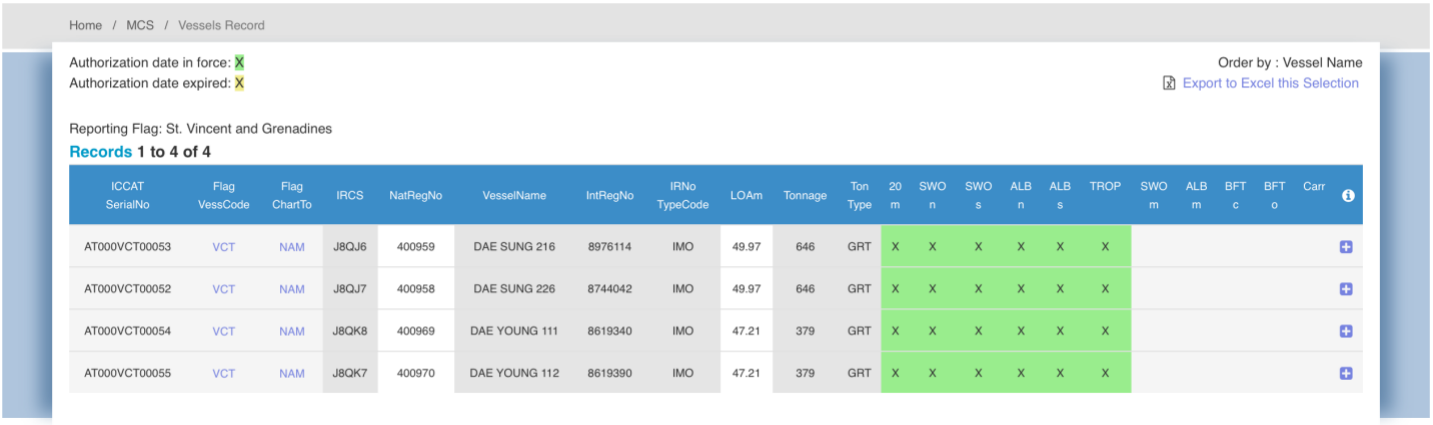
Appendix 5 – Information available from the ICCAT's record of vessels currently available for Saint Vincent and the Grenadines

Results of search



Home / MCS / Vessels Record

Authorization date in force: X
Authorization date expired: X

Order by : Vessel Name
Export to Excel this Selection

Reporting Flag: St. Vincent and Grenadines

Records 1 to 4 of 4

ICCAT SerialNo	Flag VessCode	Flag ChartTo	IRCS	NatRegNo	VesselName	IntRegNo	IRNo TypeCode	LOAm	Tonnage	Ton Type	20 m	SWO n	SWO s	ALB n	ALB s	TROP	SWO m	ALB m	BFT c	BFT o	Carr
AT000VCT00053	VCT	NAM	J8QJ6	400959	DAE SUNG 216	8976114	IMO	49.97	646	GRT	X	X	X	X	X	X					
AT000VCT00052	VCT	NAM	J8QJ7	400958	DAE SUNG 226	8744042	IMO	49.97	646	GRT	X	X	X	X	X	X					
AT000VCT00054	VCT	NAM	J8QK8	400969	DAE YOUNG 111	8619340	IMO	47.21	379	GRT	X	X	X	X	X	X					
AT000VCT00055	VCT	NAM	J8QK7	400970	DAE YOUNG 112	8619390	IMO	47.21	379	GRT	X	X	X	X	X	X					

Source: ICCAT, 'ICCAT Record of Vessels', accessed 7.10.2020, https://www.iccat.int/en/VesselsRecord.asp.

ENVIRONMENTAL JUSTICE FOUNDATION
Protecting People and Planet

16 June 2021

Vessel Information Alert

Vessels having potentially engaged in illegal fishing in the Atlantic Ocean listed on the record of currently authorised vessels of the Indian Ocean Tuna Commission

The Environmental Justice Foundation (EJF) is an international not for profit organisation working globally to combat illegal, unreported and unregulated (IUU) fishing. EJF promotes and encourages international information-sharing to enhance transparency in the fisheries sector. To this end, EJF gathers information on fishing vessels' identities and activities through a combination of field investigations, satellite monitoring and open-source intelligence, community surveillance projects and gathering human intelligence.

Intelligence indicates that three fishing vessels having potentially engaged in IUU fishing activities in the Atlantic Ocean have recently been included in the record of vessels currently authorised to operate in the Indian Ocean Tuna Commission (IOTC) area.

This Vessel Information Alert (VIA) follows a Vessel Activity Notification (VAN) dated 4 November 2020 which related to two of the three fishing vessels concerned by this VIA. The VAN dated 4 November 2020 had been shared with the International Commission for the Conservation of Atlantic Tunas (ICCAT) and seven of its Contracting Parties. The VAN dated 4 November 2020 is sent together with this VIA.

Vessels' identities

Current name	Latest known former names	IMO number	Latest known IRCS	IOTC number	Vessel type	Reported length overall	Current flag	Latest known former flag
ISRAR 1	MARCO 21 MEGA NO. 2	8004076	A4BB5	17758	Fishing vessel (longliner)	44,8 metres	Oman 	Belize[1] 
ISRAR 2	RICOS NO. 6 MARIO NO. 6	8568694	A4BA3	17759	Fishing vessel (longliner)	23,8 metres		Saint Vincent and the

[1] The IMO Global Integrated Shipping Information System (GISIS) indicates that the fishing vessels identified as ISRAR 1 flew the flag of Belize from January 2016 to November 2018. The vessel's flag between November 2018 and April 2021 is reported as unknown. The IMO GISIS indicates that it has been flying the flag of Oman since April 2021. Whilst in principle the IMO GISIS should contain accurate information, the possibility of inadvertent omissions or inaccuracies cannot be ruled out.

ISRAR 3	RICOS NO. 3 MARIO NO. 3	8568682	A4BA5	17760	Fishing vessel (longliner)	23,8 metres		Grenadines[2] 

This table builds on the information contained in the VAN dated 4 November 2020 and was updated using various sources including the following ones:

- IMO Global Integrated Shipping Information System (IMO GISIS)[3];
- Record of currently authorised vessels of the IOTC (see **Appendix 1**)[4]; and
- IHS Maritime Portal Sea-web Ships[5].

The current flag state of the vessels, Oman, has not uploaded information in the FAO Global record of fishing vessels, refrigerated transport vessels and supply vessels[6].

The fishing vessel identified under IMO number: 8004076 – namely the ISRAR 1, ex-MARCO 21 and MEGA NO. 2 – was not included in the VAN dated 4 November 2020. EJF identified and started collecting information on this vessel from mid-November 2020 (see **Vessels' activities**).

A photograph of the three vessels docked alongside, presumably taken in Port Louis, Mauritius, on 21 January 2021, is available in **Appendix 2**.

Latest known legal person acting as registered owner/operator of the vessels

Latest known legal person acting as registered owner/operator of the vessels[7]	Place of registration	Address of registration
ALMURAN INTERNATIONAL LLC	Oman 	PO box 2932, pc112, Ruwi, Muscat, Oman

Various websites link the address of registration mentioned in the IOTC record of currently authorised vessels

[2] As mentioned in the VAN dated 4 November 2020, the Fisheries Division of the Ministry of Agriculture, Forestry, Fisheries, Rural Transformation, Industry and Labour of Saint Vincent and the Grenadines (VCT) indicated that these two vessels had been deregistered from VCT on 13 September 2018. Their status, or the status they claim until they reflagged to Oman, needs to be clarified, as suggested in the recommendations included in the VAN dated 4 November 2020.

[3] IMO, 'Global Integrated Shipping Information System – Ship and Company Particulars', accessed 16.06.2021, https://gisis.imo.org/Public/Default.aspx (credentials required, free of charge).

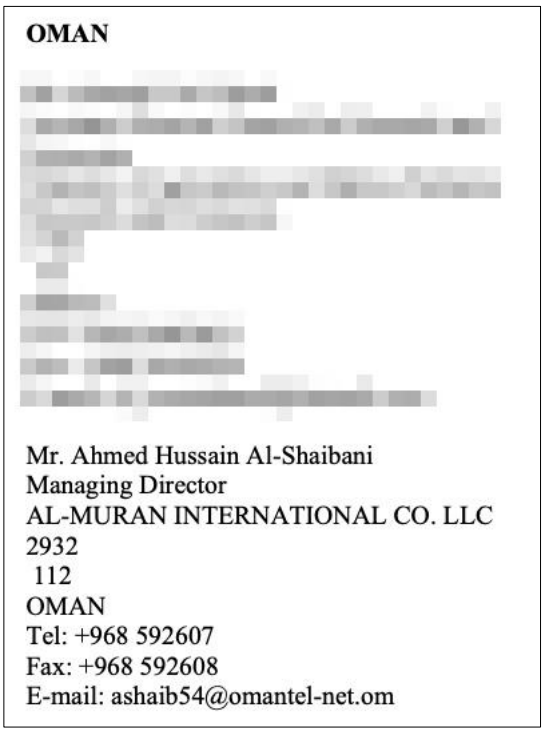
[4] IOTC, 'Record of currently authorised vessels of the IOTC', accessed 16.06.2021, https://iotc.org/vessels/current.

[5] IHS Maritime Portal Sea-web Ships, accessed 16.06.2021, https://maritime.ihs.com/Home/Index (subscription required).

[6] FAO, 'Global record of fishing vessels, refrigerated transport vessels and supply vessels', accessed 16.06.2021, http://www.fao.org/global-record/information-system/en/.

[7] IOTC, 'Record of currently authorised vessels of the IOTC', accessed 16.06.2021, https://iotc.org/vessels/current.

with a company engaged in the trade of fisheries products referred to as 'AL MURAN INTERNATIONAL CO. LLC' with contact details: +968 592607 (phone, or +968 24592607; or +968 99339595), +968 592608 (fax, or +968 24592608) and muranint@omantel.net.om (email)[8,9,10]. As shown in the image below, EJF notes that the phone and fax numbers +968 592607 and +968 592608 can be found in appendix 1 (list of participants) of the report of the ninth session of the IOTC held in Seychelles in 2005[11]. EJF is not in a position to assert that the entirety of the information contained in this report is still relevant.


OMAN

[redacted]

Mr. Ahmed Hussain Al-Shaibani
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Extract from the appendix 1 (list of participants) of the report of the ninth session of the IOTC

The IOTC record of currently authorised vessels lists the company ALMURAN INTERNATIONAL LLC as legal person acting as registered owner/operator of the vessels whereas the IMO GISIS and IHS Maritime Portal Sea-web Ships list the vessel ISRAR 1 as operated and owned (registered owner) by a company named STARLIGHT LLC (IMO number: 6232179) also registered in Oman (with its address of registration reported as "Ruwi, Oman"). The information contained in these two databases for the vessels registered under IMO numbers: 8568694 (namely ISRAR 2) and 8568682 (namely ISRAR 3) still reflects their previous identities (i.e. RICOS NO. 6 and RICOS NO. 3). Hence, more information can be found in the VAN dated 4 November 2020.

[8] InterFishMarket, accessed 16.06.2021, https://interfishmarket.com/en/company.aspx?id=52903.
[9] FrozenB2B, accessed 16.06.2021, https://www.frozenb2b.com/oman/frozen-fish-frozen-seafood-4964.
[10] SooPage, accessed 16.06.2021, http://omn.soopage.com/company/AL_MURAN_INTERNATIONAL_CO_LLC_36u.html.
[11] IOTC, 'Report of the ninth session', accessed 16.06.2021, https://iotc.org/documents/report-ninth-session-indian-ocean-tuna-commission.

Vessels' activities

- **Vessels identified under IMO numbers: 8568694 (currently ISRAR 2) and 8568682 (currently ISRAR 3)**

As described in the VAN dated 4 November 2020, using satellite-based tracking systems that allow for the observation of vessels equipped with an automatic identification system (AIS), EJF identified that the vessels registered under IMO numbers: 8568694 (ex-RICOS NO. 6) and 8568682 (ex-RICOS NO. 3) had potentially operated in the area under the competence of the ICCAT while not on the ICCAT record of vessels until the first half of November 2020.

Using a combination of means, EJF continued monitoring the whereabouts of the vessels and gathering information on their identities and activities.

AIS data[12] transmitted after the VAN dated 4 November 2020 indicate that the two vessels sailed southwards across the Atlantic Ocean which they reportedly exited on 5 December 2020 to enter the Indian Ocean heading towards the exclusive economic zone (EEZ) of Mauritius which they would have entered on 14 December 2020. Throughout their voyage, the ISRAR 2 and ISRAR 3 respectively transmitted AIS data under the identities of 'RICOS NO.6' (MMSI number: 377907276) and 'RICOS NO.3' (MMSI number: 377907277). Tracks of the vessels are available upon request.

Information available from the Mauritius Ports Authority indicates that they have entered port areas of Port Louis, Mauritius, on 16 December 2020[13]. The information published by the Mauritius Ports Authority identifies them under the names of ISRAR 2 and ISRAR 3. No information is available as to the flag they claimed when entering the port areas. The purpose of their port calls has been reported to be for "bunker / [provisions] / repairs".

At the time of writing this VIA, the vessels ISRAR 2 and ISRAR 3 are still reported within port areas of Port Louis, Mauritius (berth/bollard: 'DDG') by the Mauritius Ports Authority[14].

Human intelligence gathered by EJF on the vessels' identities and activities corroborates the information gathered from satellite-based tracking systems and the open-source intelligence collected.

- **Vessel identified under IMO number: 8004076 (currently ISRAR 1)**

Information available from the Mauritius Ports Authority also indicates the presence of a third vessel of interest within port areas of Port Louis, Mauritius. This vessel has also entered these port areas on 16 December 2020 and was identified under the name of ISRAR 1. No information is available as to the flag it claimed when entering

[12] ExactEarth Shipview, accessed 16.06.2021, https://shipview.exactearth.com.
[13] Mauritius Ports Authority, 'Daily port situation', accessed 16.06.2021, http://www.mauport.com/daily-port-situation.
[14] Mauritius Ports Authority, 'Daily port situation', accessed 16.06.2021, http://www.mauport.com/daily-port-situation.

the port areas. The purpose of the port call of this vessel has also been reported to be for "bunker / [provisions] / repairs"[15].

As for the ISRAR 2 and ISRAR 3, EJF monitored the voyage of the ISRAR 1 to port areas of Port Louis, Mauritius, using satellite-based tracking systems that allow for the observation of vessels equipped with an AIS. AIS data indicate that the vessel sailed southwards across the Atlantic Ocean together with the ISRAR 2 and ISRAR 3; reportedly entering the Indian Ocean on 5 December 2020 and the EEZ of Mauritius on 14 December 2020. Throughout its voyage, ISRAR 1 transmitted AIS data under the identities of 'MARCO NO.21' and 'HONG YANG 18' (IMO number: 9895135 and MMSI number: 312278000)[16]. Tracks of the vessel are available upon request.

At the time of writing this VIA, the vessel ISRAR 1 is still reported within port areas of Port Louis, Mauritius (berth: 'Q3-QQ', bollard: '(13 17)') by the Mauritius Ports Authority. The vessel is reportedly "[loading] bunker" (see **Appendix 3**).

On the basis of the AIS data presumably transmitted by the vessel currently identified as ISRAR 1 prior to it sailed southwards across the Atlantic Ocean, EJF cannot exclude that – similarly to the ISRAR 2 and ISRAR 3 – this vessel operated in the area under the competence of the ICCAT.

EJF notes that the ICCAT record of inactive vessels[17] includes a vessel identified under a previous identity of ISRAR 1 / MARCO 21, i.e. under IMO number: 8004076 and the name MEGA NO. 2 (reportedly flagged to Belize, with AT000BLZ00061 as ICCAT number).

No information on possible past authorisations is publicly available from the ICCAT record of inactive vessels. As such, further verifications by the relevant competent authorities – particularly those of Belize – could be instrumental to ascertain whether the potential activities the vessel may have undertaken in the Atlantic Ocean were conducted in accordance with all relevant international, regional and national conservation and management measures (CMMs).

Human intelligence gathered by EJF on the vessel's identities and activities corroborates the information gathered from satellite-based tracking systems and the open-source intelligence collected. It also indicates that when operating in the Atlantic Ocean, the vessel currently identified as ISRAR 1 may have potentially, under previous identities, served as a "semi-collector" vessel which would have interacted with several other fishing vessels in the form of at-sea trans-shipments of fisheries products and transfers of crew.

[15] While the information published by the Mauritius Ports Authority does not indicate the vessels' identifiers, it includes their approximate lengths overall, i.e. "45 [metres]" for ISRAR 1 and "24 [metres]" for ISRAR 2 and 3. EJF notes that the reported lengths overall of the vessels in the IOTC record of currently authorised vessels are, respectively, 44,8 and 23,8 metres.

[16] EJF assesses that this may be suggestive of AIS manipulation.

[17] ICCAT, 'ICCAT record of vessels', accessed 16.06.2021, https://www.iccat.int/en/VesselsRecord.asp.

Additional information on the status of the fishing vessels in the IOTC record of currently authorised vessels

EJF notes that the fishing vessels ISRAR 1, ISRAR 2 and ISRAR 3 are included in the IOTC record of currently authorised vessels as authorised from 30 May 2021 to 29 May 2022. It also notes that no information on previous name(s), flag(s) and details of deletion from other registries are publicly available from the IOTC record of currently authorised vessels. Similarly, no photographs of the vessels are available. This could be indicative of a possible failure by the current flag state of the vessels to transmit to the IOTC information required under paragraph 3 of Resolution 19/04 concerning the IOTC record of vessels authorised to operate in the IOTC area of competence[18].

Paragraph 5 of Resolution 19/04 provides that "if any of the information in paragraph 3 is not submitted, the vessel shall not be included in the IOTC Record […]".

Recommendations

EJF recommends that **Oman**:

1. Reviews the information contained in the VAN dated 4 November 2020.
2. Verifies and clarifies, through inter-agency cooperation, the status of the fishing vessels concerned by this VIA vis-à-vis the Ministry of Agriculture and Fisheries Wealth, and the Ministry of Transport, Communications and Information Technology.
3. Verifies and clarifies the nature of their activities, be it at sea or in ports. In this context, confirms whether they are monitored through vessel monitoring systems (VMS) and require them to maintain in operation an AIS.
4. Immediately, issues a prohibition to sail for the vessels should it be confirmed that they were granted the right to fly the flag of Oman.
5. Immediately, removes them from the IOTC record of currently authorised vessels and suspend or cancel all fishing authorisations they may have received.
6. Investigates, through inter-agency cooperation, the ownership structure of the vessels to identify their beneficial owner(s). To that end, verifies the companies' status, their shareholder structures, the modalities of their incorporation, etc. and closely cooperate with the competent authorities of the port state where the vessels would currently be located.
7. Actively cooperates with all relevant states and bodies concerned by this VIA and the VAN dated 4 November 2020 in the context of the verifications and investigations that these documents may have triggered.
8. To that end and considering the nature of the case and the multiplicity of jurisdictions involved, considers requesting support from INTERPOL through Oman's National Central Bureau.

[18] IOTC, 'Resolution 19/04 concerning the IOTC record of vessels authorised to operate in the IOTC area of competence', accessed 16.06.2021, https://iotc.org/cmm/resolution-1904-concerning-iotc-record-vessels-authorised-operate-iotc-area-competence.

9. Considers auditing the conditions in which the vessels were reflagged to the country and obtained authorisations to engage in fishing activities/to be included in the IOTC record of currently authorised vessels.

EJF recommends that **Mauritius**:

1. Reviews the information contained in the VAN dated 4 November 2020.
2. Confirms, through inter-agency cooperation, the presence of the three vessels concerned by this VIA within port areas of Port Louis and retrace the chronological events of their presence in areas under the jurisdiction of Mauritius.
3. Abstains from issuing port clearance certificates or any equivalent document that would allow them to leave port.
4. As a Party to the FAO Agreement on Port State Measures[19] and Contracting Party of the IOTC bound by Resolution 16/11 on port state measures to prevent, deter and eliminate IUU fishing[20], fully implements the provisions of these legal instruments – particularly those of Article 11 of the FAO Agreement on Port State Measures.
5. Actively cooperates with all relevant states and bodies concerned by this VIA and the VAN dated 4 November 2020 in the context of the verifications and investigations that these documents may have triggered.
6. To that end and considering the nature of the case and the multiplicity of jurisdictions involved, considers requesting support from INTERPOL through Mauritius' National Central Bureau.
7. Considers auditing the conditions in which the vessels were authorised to access port areas in Port Louis and may have been able to use these port areas for port services including refueling and resupplying and maintenance.

EJF recommends that **Belize**:

1. In addition to the demarches recommended in the VAN dated 4 November 2020, verifies and clarifies the status and activities of the fishing vessel identified under IMO number: 8004076 (ISRAR 3, ex-MARCO 21 and MEGA NO. 2) vis-à-vis the International Merchant Marine Registry of Belize and the Belize High Seas Fisheries Unit.
2. To that end and considering the nature of the case and the multiplicity of jurisdictions involved, considers requesting support from INTERPOL through Belize's National Central Bureau.
3. If that vessel, and the two other vessels concerned by this VIA, were found to have engaged in IUU fishing activities, takes appropriate enforcement action and considers joining forces with other ICCAT Contracting Parties to table a proposal for their listing as vessels presumed to have carried out IUU fishing activities at the 27th regular meeting of the ICCAT.

[19] FAO, 'Agreement on Port States Measures', accessed 16.06.2021, http://www.fao.org/port-state-measures/en/.
[20] IOTC, 'Resolution 16/11 on port state measures to prevent, deter and eliminate [IUU] fishing', accessed 16.06.2021, https://iotc.org/cmm/resolution-1611-port-state-measures-prevent-deter-and-eliminate-illegal-unreported-and.

4. From a general perspective, be prepared to engage in cooperation with the relevant states and bodies to stay abreast of the findings of the verifications and investigations this VIA and the VAN dated 4 November 2020 may have triggered and to support these states and bodies in this context.

EJF recommends that the **Secretariat of IOTC**:

1. Considers this information under Resolution 18/03[21] and other relevant IOTC resolutions.
2. Stands ready to contact the relevant states and bodies concerned by this VIA to seek clarifications as well as to stay abreast of the findings of the verifications and investigations this VIA and the VAN dated 4 November 2020 may have triggered.
3. Should failures to submit information required under paragraph 3 of Resolution 19/04 be identified, ensures full implementation of paragraph 5 of Resolution 19/04.

EJF recommends that the **Secretariat of ICCAT**:

1. Considers this information under Recommendation 08-09[22].
2. Stands ready to contact the relevant states and bodies concerned by this VIA to seek clarifications as well as to stay abreast of the findings of the verifications and investigations this VIA and the VAN dated 4 November 2020 may have triggered.
3. Clarifies the status of the fishing vessel identified under IMO number: 8004076 (ISRAR 3, ex-MARCO 21 and MEGA NO. 2) vis-à-vis the records of vessels maintained by the ICCAT[23].
4. If evidenced that the fishing activities described in this VIA and the VAN dated 4 November 2020 were not conducted in accordance with the relevant CMMs, considers this information, together with any other relevant information, under Recommendation 18-08[24] and other relevant ICCAT recommendations.

EJF recommends that the **United States**:

1. Considers this information in the context of the membership of the United States to the ICCAT and for the purpose of risk management, particularly in light of possible similarities between the modus operandi of the vessels concerned by this VIA and that of fishing vessels the United States had proposed for listing as vessels presumed to have carried out IUU fishing activities in ICCAT under Recommendation 18-08 in 2020[25].

[21] IOTC, 'Resolution 18/03 on establishing a list of vessels presumed to have carried out illegal, unreported and unregulated fishing in the IOTC area of competence', accessed 16.06.2021, https://iotc.org/cmm/resolution-1803-establishing-list-vessels-presumed-have-carried-out-illegal-unreported-and.
[22] ICCAT, 'Recommendation by ICCAT to establish a process for the review and reporting of compliance information', accessed 16.06.2021, https://www.iccat.int/Documents/Recs/compendiopdf-e/2008-09-e.pdf.
[23] ICCAT, 'ICCAT record of vessels', accessed 16.06.2021, https://www.iccat.int/en/VesselsRecord.asp.
[24] ICCAT, 'Recommendation by ICCAT on establishing a list of vessels presumed to have carried out [IUU] fishing activities', accessed 16.06.2021, https://www.iccat.int/Documents/Recs/compendiopdf-e/2018-08-e.pdf.
[25] ICCAT, '2020 Commission Documents. Recommendation 18-08: IUU list 2020. Draft list of vessels presumed to have carried out IUU fishing activities (Doc. No. PWG_405/2020)', accessed 26.10.2020, https://www.iccat.int/com2020/index.htm#en.

2. Considers joining forces with other ICCAT Contracting Parties to table a proposal for listing the three vessels concerned by this VIA as vessels presumed to have carried out IUU fishing activities at the 27th regular meeting of the ICCAT.

EJF recommends that the **European Commission**:

1. In accordance with Article 49(2) of Council Regulation (EC) No 1005/2008[26], considers the information contained in this notification in the context of the implementation of this Council Regulation and in the context of the membership of the European Union to the ICCAT and IOTC.
2. Considers joining forces with other ICCAT Contracting Parties to table a proposal for listing the three vessels concerned by this VIA as vessels presumed to have carried out IUU fishing activities at the 27th regular meeting of the ICCAT.

EJF recommends that **all states**[27]:

1. Publish details of access agreements and lists of vessels licensed to fish within their waters.
2. Publish the lists of vessels registered to their flag and of their vessels authorised to fish outside their EEZ.
3. Ensure that information made publicly available is comprehensive, credible and kept up to date as well as easily accessible, and – where applicable – consistent with and feed into information made available through the FAO Global Record of Fishing Vessels, Refrigerated Transport Vessels and Supply Vessels.
4. Publish information about sanctions handed out for IUU fishing and fisheries crimes.
5. Ratify and implement the international agreements that set clear benchmarks for standards on fishing vessels and the trade in fisheries products, including the FAO Agreement on Port State Measures.
6. Consider implementing EJF's principles for global transparency in the fishing industry which consist of ten simple measures that can play a pivotal role in the battle against IUU fishing and fisheries crimes[28].

[26] EUR-Lex, 'Council Regulation (EC) No 1005/2008 of 29 September 2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing', accessed 16.06.2021, https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=celex%3A32008R1005.
[27] EJF (2020) EJF's Charter for Transparency. Bringing the fisheries sector out of the shadows. How best to implement principles three and four of the Charter for Transparency, https://ejfoundation.org/resources/downloads/Report_Principles-three-four-final.pdf.
[28] EJF (2018) The ten principles for global transparency, https://ejfoundation.org/resources/downloads/EJF-Transparency-10-principles-final-1.pdf.

Appendix 1: Extracts from the record of currently authorised vessels of the IOTC[29]

VESSEL INFORMATION

Identification

Vessel Name: **ISRAR 1**

Vessel identifiers
IOTC: 17758
IMO: 8004076

Country: **Oman**

Flag: 

IRCS: **A4BB5**

Specifications

Type: **Longliners**

LOA: **44.80m**

GRT: **-**

GT: **536**

Gear: **Drifting longline**

Owner

Owner: **almuran international llc**

Owner address: **po box 2932, pc112, Ruwi, Muscat, Oman**

Operator

Operator: **almuran international llc**

Operator address: **po box 2932, pc112, Ruwi, Muscat, Oman**

Beneficial owner

Beneficial owner: **almuran international llc**

Beneficial owner address: **po box 2932, pc112, Ruwi, Muscat, Oman**

Company

Company: **almuran international llc**

Company address: **po box 2932, pc112, Ruwi, Muscat, Oman**

Company registration number:

Authorization period

From: **2021-05-30**

To: **2022-05-29**

Vessel Images

0 image(s) found

No historical records.

Information on the fishing vessel ISRAR 1

[29] IOTC, 'Record of currently authorised vessels of the IOTC', accessed 16.06.2021, https://iotc.org/vessels/current.

VESSEL INFORMATION

Identification

Vessel Name: **ISRAR 2**

Vessel identifiers
IOTC: 17759
IMO: 8568694

Country: **Oman**

Flag: 

IRCS: **A4BA3**

Specifications

Type: **Longliners**

LOA: **23.80m**

GRT: **-**

GT: **87**

Gear: **Drifting longline**

Owner

Owner: **almuran international llc**

Owner address: **po box 2932, pc112, Ruwi, Muscat, Oman**

Operator

Operator: **almuran international llc**

Operator address: **po box 2932, pc112, Ruwi, Muscat, Oman**

Beneficial owner

Beneficial owner: **almuran international llc**

Beneficial owner address: **po box 2932, pc112, Ruwi, Muscat, Oman**

Company

Company: **almuran international llc**

Company address: **po box 2932, pc112, Ruwi, Muscat, Oman**

Company registration number:

Authorization period

From: **2021-05-30**

To: **2022-05-29**

Vessel Images

0 image(s) found

No historical records.

Information on the ISRAR 2

VESSEL INFORMATION

Identification

Vessel Name: **ISRAR 3**

Vessel identifiers
IOTC: 17760
IMO: 8568682

Country: **Oman**

Flag: 

IRCS: **A4BA5**

Specifications

Type: **Longliners**

LOA: **23.80m**

GRT: **-**

GT: **87**

Gear: **Drifting longline**

Owner

Owner: **almuran international llc**

Owner address: **po box 2932, pc112, Ruwi, Muscat, Oman**

Operator

Operator: **almuran international llc**

Operator address: **po box 2932, pc112, Ruwi, Muscat, Oman**

Beneficial owner

Beneficial owner: **almuran international llc**

Beneficial owner address: **po box 2932, pc112, Ruwi, Muscat, Oman**

Company

Company: **almuran international llc**

Company address: **po box 2932, pc112, Ruwi, Muscat, Oman**

Company registration number:

Authorization period

From: **2021-05-30**

To: **2022-05-30**

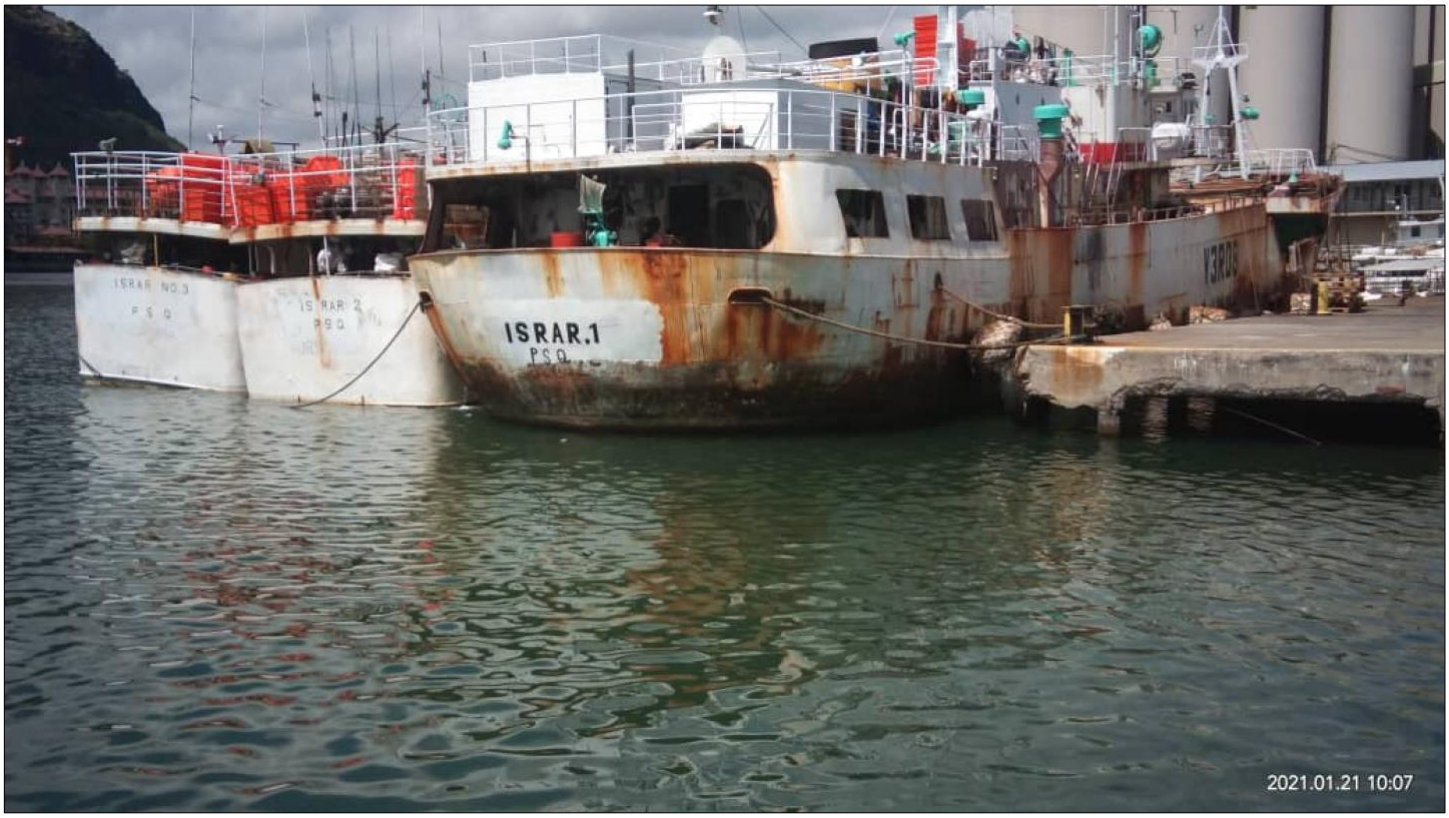
Vessel Images

0 image(s) found

No historical records.

Information on the ISRAR 3

Appendix 2: Photograph of the three vessels presumably taken in Port Louis, Mauritius, on 21 January 2021



Photograph of the three vessels presumably taken in Port Louis, Mauritius, on 21 January 2021

This photograph depicts the vessels ISRAR 1, ISRAR 2 and ISRAR 3 under the name of, respectively, 'ISRAR.1', 'ISRAR 2' and 'ISRAR NO.3'. All three vessels have painted the acronym 'PSQ' on their stern. EJF assesses that this acronym refers to 'Port Sultan Qaboos' in Muscat, Oman[30]. An additional identifier, 'V3RD8', is also visible on the starboard side of the vessel ISRAR 1. EJF notes that V3RD8 is the international radio call sign listed for the vessel identified under IMO number: 8004076 and name MEGA NO. 2 – a previous identity of ISRAR 1 / MARCO 21 – in the ICCAT record of inactive vessels (see **Vessels' activities**).

Through imagery analysis, EJF could confirm that the photograph was taken in Port Louis, Mauritius, with the grain silos of the company LES MOULINS DE LA CONCORDE[31] visible in the top right background of the vessels and the distinguishable roof architecture of the Caudan Waterfront[32] visible in their top left background.

The image included in the next page is a satellite image of part of the port areas of Port Louis, Mauritius, which

[30] United Nations, Economic and Social Commission for Western Asia, 'Port Sultan Qaboos', accessed 16.06.2021, https://www.unescwa.org/port-sultan-qaboos.
[31] Wikimedia Commons, 'Silos of Les Moulins de la Concorde', accessed 16.06.2021, https://commons.wikimedia.org/wiki/Category:Silos_of_Les_Moulins_de_la_Concorde
[32] Wikimedia Commons, 'Caudan Waterfront', accessed 16.06.2021, https://commons.wikimedia.org/wiki/Category:Caudan_Waterfront

allows for the identification of the grain silos mentioned above (circled in orange), of the Caudan Waterfront (circled in yellow) and of the possible area where the vessel could have been located when the photograph was taken (circled in red).

Satellite image of part of the port areas of Port Louis, Mauritius

EJF notes that information on the daily port situation published by the Mauritius Ports Authority for 21 January 2021 confirms the presence of the vessels within port areas of Port Louis, Mauritius, on that date[33].

[33] Mauritius Ports Authority, 'Port situation 21 January 2021', accessed 16.06.2021, http://www.mauport.com/port-situation-21-january-2021.

Appendix 3: Photograph of the ISRAR 1 possibly receiving bunker in Port Louis, Mauritius, on 16 June 2021

Photograph of the ISRAR 1 possibly receiving bunker in Port Louis, Mauritius, on 16 June 2021

Appendix 5

Response from Senegal to information submitted by EJF

REPUBLIC OF SENEGAL
Ministry of Fisheries
and Maritime Economy

Maritime Fishery Directorate

Dakar, 17 November 2020

The Director
To
Mr. Camille Jean Pierre MANEL
Executive Secretary of ICCAT
-Madrid (Spain)-

Subject: Comments on informations from EJF for consideration in 2021

Mr. Executive Secretary,

I acknowledge receipt of your Circular #7668/20 on the transmission of information from EJF for consideration in 2021. Concerning the vessels RICOS 3 and RICOS 6, Senegal acknowledges and supports the proposal to go over this issue in 2021.

However, Senegal would like to share the following information:

- vessel RICOS 3 was in the port of DAKAR for repair in 2017 ;

- vessels RICOS 3 and RICOS 6 touched the port of Dakar for repairs.

Please accept, **Mr. Executive Secretary**, the assurances of my highest consideration.

Appendix 6

Response from Belize to information submitted by EJF

REF: HSFU-RFMO-V07-2021(57) Vol.1

7th July 2021

Camille Jean Pierre Manel Executive Secretary
International Commission for the Conservation of Atlantic Tunas Corazon de Maria, 8 – 28002
Madrid Spain

SUBJECT: INFORMATION FROM THE EJF FOR CONSIDERATION IN 2021

Dear Camille Jean Pierre Manel

We acknowledge receipt of ICCAT Circular #4546/2021 dated 24th June 2021 regarding the subject matter and its relations to ICCAT Recommendation to establish a process for the review and reporting of compliance information in respect to potential illegal fishing activities.

In the communication attached to the Circular, submitted by the Environmental Justice Foundation (EJF) dated 4th November 2020, it is alleged that two vessels, previously registered with St. Vincent and the Grenadines and whose flag is currently unknown, may have engaged in IUU fishing in the ICCAT Convention area. These vessels are also alleged to be under the ownership of Belize registered company **GREAT VISIONS CO., LTD**. As there is no evidence that these vessels are still currently under this ownership, the relevant authority, the Belize International Corporate Affairs Registry (BICAR) can only confirm that the company is registered with Belize and is in good standing. The regulatory authority for international business companies, the International Financial Services Commission (IFSC) would very much wish to cooperate on this matter, however, in accordance with national regulation they can only disclose information on beneficial ownership to law enforcement authorities, banking, regulatory or supervisory authorities if reasonably required to facilitate a criminal investigation, prosecution or proceeding.

Regarding the second communication submitted by EJF dated 16th June 2021 it is alleged that three vessels may have potentially engaged in IUU fishing activities in the Atlantic Ocean, one of which is listed as previously flagged with Belize. In this context, we wish to advise the following:

a. Vessel MARCO 21 currently under the flag of Oman, was previously licensed and registered with Belize under the name MEGA NO.2 from 2016 to 2018.

b. The Mega No.2 was deleted from Belize on 8th November 2018 due to sale and transfer to the Registry of Senegal.

c. The Mega No.2 was licensed to operate and carry out fishing operations in the ICCAT Convention area and was included on the ICCAT List of Authorized Large Scale Fishing Vessels during its registration with Belize.

d. The Mega No.2 was also authorized to carry out transshipment at sea in accordance with the ICCAT Regional Observer Program.

e. During this vessel's time of operation under the Belize flag there were no incidence of reported IUU fishing by this vessel.

Since the vessel was compliant while under our Registry, there are no legal grounds for us to take any remedial or enforcement measures against this vessel as the alleged IUU activities seem to have taken place after the vessel was deleted from Belize. Nonetheless, we are ready to cooperate with any of the flag States involved if they require any additional information, we can legally provide on the vessel and its operation while under the Belize flag.

Please accept the assurances of our highest consideration.

Sincerely,

Belize High Seas Fisheries Unit Government of Belize

Valarie Lanza
Director of High Seas Fisheries
Belize High Seas Fisheries Unit

Cc: Director General, IFSC & Registrar of Merchant Ships and Companies