

ADDENDUM 1 to COC-312

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This addendum to COC-312/2025 contains the responses to the information received under Rec. 08-09 after 16 of October 2025, from: Cape Verde and the European Union.

Le présent addendum au COC-312/2024 contient les réponses aux informations reçues au titre de la Rec. 08-07 après le 16 octobre 2025, de : Cap Vert et L'Union européenne.

Esta adenda al COC-312/2025 contiene las respuestas a la información recibida con arreglo a la Rec. 08-09, después del 16 de octubre de 2024, de: Cabo Verde y la Unión Europea.



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À SECRETARIA DE ICCAT –
MADRID ESPAÑA

Exmo. Miguel Neves dos Santos
Secretario executivo adjunto
p.p. Exmo. Presidente del Comité de Cumplimiento

Mindelo, S. Vicente, 03 de 08-2025

ASUNTO: RESPUESTA DE CABO VERDE A COMUNICACIÓN DE LA UNIÓN EUROPEA comunicación ICCAT-Salida 2025-07-18 S25-07191, sobre un posible incumplimiento de las medidas de conservación y ordenación de ICCAT – Cabo Verde.

Saludamos cordialmente a la Secretaría de la ICCAT.

Tras la comunicación de la UE sobre este asunto, Cabo Verde, a través de la DNPA, solicita a la Secretaría de ICCAT que revise completamente su lista de buques de más de 20 metros en el registro de la Base de Datos de ICCAT, para suspender las autorizaciones al pesca de pez espada del norte, que se indicaron incorrectamente como permiso para pescar en el momento de presentar la solicitud de registro de Buques con pabellón CPV, conforme consta en el formulario CP01-VessLst.

Es importante aclarar que la intención de indicar estas especies en el formulario de registro de buques de la CICA no fue por motivos de pesca de pez espada, ya que Cabo Verde aún no dispone de una cuota para esta especie, sino porque en la pesquería de palangre para el tiburón tintorera un porcentaje mínimo de pez espada es captura como by catch ó como pesca asesoría.

Cabo Verde, como país miembro de la CICA, entiende que esta situación solo se puede resolver con la asignando una cuota de pez espada que le permita realizar la pesca dirigida para esta especie de forma responsable, cumpliendo, por supuesto, con el cumplimiento, las directrices y las recomendaciones de la CICA para la sostenibilidad y la conservación.

En este sentido, le informamos que Cabo Verde está tramitando una solicitud de cuota por derecho propio como Estado miembro de la CICA.

Por lo tanto, mientras Cabo Verde aguarda la asignación de una cuota para el pez espada, solicitamos a la Secretaría de la ICCAT que revise e y haga una nueva actualización de la lista de buques de Cabo Verde en la Base de Datos de registro de ICCAT, y que suspenda inmediatamente la autorización de pesca para el pez espada del norte.

Agradecemos también a la Secretaría que informe y comparta con todas las CPC la postura de Cabo Verde respecto a la solicitud de la Unión Europea para que Cabo Verde suspenda la autorización de pesca de pez espada para sus buques de más de 20 metros registrados en la base de datos de la CICA.

Adjuntamos también el formulario CP01-VessLst rectificado, excluyendo la opción de captura de pez espada del norte.

Sin embargo, Cabo Verde queda a la disposición de la secretaria de ICCAT para cualquier aclaración que considere necesaria al respecto.

Finalmente, le reitero a Su Excelencia el testimonio de nuestra más alta consideración.

Cordialmente,

Carlos Alberto Mendes Monteiro
Diretor Nacional de Pesca e Aquacultura

Authorization date in force: X
Authorization date expired: X

Order by: Vessel Name
 [Export to Excel this Selection](#)

Records 1 to 7 of 7

ICCAT SerialNo	Flag RepCode	Flag VessCode	Flag ChartTo	IRCS	NatRegNo	Name	IntReg Number	IntReg Type	LOAm	Tonnage	Tonnage Type	20 m	SWO n	SWO s	ALB n	ALB s	TROP	SWO m	ALB m	BFT c	BFT o	Carr	
AT0067484	CPV	CPV	---	D4IP	3986-P	FLOR D'OLIVEIRA/CG	8466573	IMO	21.37	50	GRT	X	X				X						
AT0007513	CPV	CPV	---	D4HG	3307-P	LUTA DE PESCADOR	0000000	WOD	26.7	66	GRT	X	X				X						
AT0024729	CPV	CPV	---	D4CC	2.589-P	Muncreca	8706301	IMO	20.45	121	GRT	X	X				X						
AT0067483	CPV	CPV	---	D4CE	3643-P	NOROESTE	8616116	IMO	20.45	120.4	GRT	X	X				X						
AT0004312	CPV	CPV	---	D4IG	4.095-P	NUEVO LUZ ALBA	2847127	IMO	23.45	83.4	GRT	X	X				X						
AT0067485	CPV	CPV	---	(blank)	2622-P	PONTA CACIMBA	null	unk	20.7	56.62	GRT	X	X				X						
AT0003466	CPV	CPV	BRA	D4EJ	2831-P	XAGUATE	8466585	IMO	26	120.19	GRT	X	X				X						

ADDITIONAL COMMENTS FROM EUROPEAN UNION ON ISSUES OF NON-COMPLIANCE

The EU provides below further comments as regard the reply sent by Senegal under COC_312/2025 and Annex 3 - Additional information submitted by Senegal

Follow-up of previous requests

The EU takes note of the results of investigations by Senegal and notes that the information under point 5 “New Elements” of Senegal’s reply, does not contain any of the information expected from Senegal as Flag, Port and exporting State.

On Senegal’s remarks regarding the importing state:

- 1) As regards the request from Senegal (2 May 2025 – ICCAT Circular No 00476/2025) to provide *“the list of all importers of the certified products concerned, together with their addresses and the points of entry into the European market”*, the EU reply is provided as an annex to Senegal’s submission, clearly mentioning the EU’s request to Senegal to:
 - Clarify the legal basis for this request
 - In which way the list of importers would facilitate Senegal’s investigations.

Senegal never replied to this.

The interpretation of Recommendation 06-13 on trade measures has already been clarified last year by the Compliance Committee, and the EU draws the attention of Senegal to the fact that the purpose of the information collected pursuant to point 1(1) of Recommendation 06-13 is to identify the vessels that landed the species concerned as well as the points of export.

- 2) As regards the Senegalese company TUNASEN, which the EU has been investigating given the possible involvement of EU nationals, the EU Member State in charge never got replies to the additional questions it raised to Senegal since 2024, despite two reminders in 2025. The EU would appreciate that Senegal would swiftly address such requests.
- 3) The EU would also like to clarify that all available information related to the fraudulent imports into the EU have already been transmitted in 2023 to the relevant EU investigating authorities.
- 4) Last, but not least, the name of the Belgian national that has been shared by Senegal should be well-known to Senegal, as he was a member of the Senegalese delegation to ICCAT in 2015 (ICCAT Report for biennial period, 2014-15 PART II (2015), p.36), registered as manager of ART SAP-MITO, the Senegalese company, but also Maguro, S.A. the Swiss company.

Further to these clarifications on the actions that it took, the EU would like to recall, once again, that this laundering scheme would have been impossible if Senegal had properly implemented its responsibilities as Flag State, as Port State and as exporting State. The scale of the fraud is a reflection of the magnitude of the issues in all these areas. In that respect, the EU refers to the data that are still missing in Senegal’s reply (under points 1,2,3 and 4 and the Annex).

As Flag State, Senegal still does not provide the details of the catches made by MARIO 7 and MARIO 11. More detailed catch data is eventually provided for the vessels MAXIMUS and LISBOA, but remains

incomplete: as an example, table 2 reports that the vessel LISBOA landed in total 3918 tons over the period 2019-2020 but table 1 only provides a breakdown per species of 992 tons.

The EU also requests that Senegal clarifies the source of the quantities mentioned in table 1 and table 2.

In table 1 because the reference to “certified quantities” could suggest that these quantities reflect the ones in the certificates transmitted by the EU, but the quantities do not match (obvious difference in the quantities of albacore tuna reported for LISBOA).

In table 2 because the figures are inconsistent with the ones submitted last year by Senegal (COC_312/2024_Addendum_1) – see below:

	<i>COC_312/2024_Addendum 1</i>			<i>COC 312/2025, table 2 .</i>		
	<i>Entries</i>	<i>Landings</i>	<i>Quantity landed (kg)</i>	<i>Entries</i>	<i>Landings</i>	<i>Quantity landed (kg)</i>
MAXIMUS in 2019	8	8	3 349 787	9	8	1 499 069
MAXIMUS in 2020	7	7	1 552 684	6	6	1 101 997
LISBOA in 2019	10	9	1 658 759	11	11	2 161 934
LISBOA in 2020	8	8	1 307 497	8	8	1 756 289
TOTAL	33	32	7 868 727	34	33	6 528 289

As a result, the catches landed by Senegal’s longline fleet in 2019 and 2020 remain unknown. The failure to provide detailed catch data casts doubts on Senegal’s ability to monitor quotas assigned to its fleet.

The EU requests that Senegal shares with the EU, on a bilateral basis, all Customs manifests issued to the vessels that had illegal exports to the EU and are mentioned in the Annex 1, first table (Title “*date d’entrée des navires au port débarquement de 2019 à 2020*”).

As regards the registration procedure of OCEAN STAR 1 and OCEAN STAR 2, the EU takes note of the information provided by Senegal but strongly regrets that this information was not brought up in 2020, when the OCEAN STAR 2 was IUU listed.

As Port State, the information on landings provided as regards vessels SAGE, RICOS No3, RICOS No6 and MEGA No2 are still incomplete. The EU requests once more the information of landings by species. The EU is specifically concerned that the information on the landings simply refers to “tuna”, without any breakdown per species. The information provided in table 3 of the document is also not totally consistent with data provided last year by Senegal (COC_312/2024_Addendum_1). For instance, the vessel SAGE is mentioned with 2 landings in 2017 in the document submitted this year but with the exact same landed quantity of fish as indicated last year where only 1 landing for that vessel in 2017 was mentioned.

The EU also notes that the information provided by Senegal confirms calls in Dakar by two additional vessels involved in IUU activities (OCEAN STAR 1 and OCEAN STAR 2). That information was not reported either in 2020, whereas this would have enabled ICCAT to IUU-list as well the OCEAN STAR 1.

In the absence of a comprehensive report on activities and catches landed by the vessels, the EU is still not in position to assess if the sanction applied to MAXIMUS as communicated last year by Senegal in the annual meeting (COC_312/2024-Addendum_1) is proportionate and deterrent.

Moreover, while assuming that this investigation as Flag State is now completed, we understand that Senegal does not intend to impose other sanctions than this one, which was only for MAXIMUS. This is in contradiction with the fact that other vessels were involved in these illegal activities, and with the statement made last year in COC-312/2024-Addendum_1 (*“Le Sénégal va approfondir les enquêtes sur toutes ces questions complexes en vue de déterminer toutes les ramifications de ces affaires, de mieux identifier les auteurs et leurs niveaux de responsabilité. Des sanctions appropriées seront appliquées.”*) The EU would like to get clarifications from Senegal on that point.

Possible non-compliance with ICCAT Recommendations 19-02 and 21-01 (BET quota allocated to Senegal)

The EU has major issues with the reply provided by Senegal, and calls on the COC to draw all necessary conclusions from Senegal's absence of cooperation on the matter.

First, the EU draws the attention of the COC on Senegal's failure to clarify any of the inconsistencies reported by the EU – with the exception of the 54 tons of BET in 2021 caught by the artisanal fleet, which as confirmed by Senegal were omitted from the total catch reported for the quota monitoring exercise.

- 1) Senegal does not clarify why there were only 756¹ tons of BET catches reported in 2021 whereas the EU import data already shows that a minimum catch of 802 tons was imported in the EU. In addition, these 802 tons do not include any import from the 5 purse seiners that have their 2021 catch data published in the Marine Stewardship Council report issued for this fishery, nor from one of the two other purse seiners under Senegalese flag that year. According to logbook data available in the report, the total BET catch made by these vessels in 2021 was 501 tons². Just adding this catch to the minimum one imported into the EU and the artisanal one (501 + 802 + 54) leads to a quantity that already exceeds Senegal 2021 quota (1357 tons vs 1322 tons). And of course this figure is far from being comprehensive, for instance because the vessels that exported to the EU did not export all their catches to the European market³. In this regard, the EU calls on all other CPCs that had imports of BET from Senegal to share their import data as well.
- 2) Senegal does not clarify the inconsistency of the pole and line catch data that it reported to ICCAT. At least 175 tons caught by Senegalese pole and line vessels in the year 2022 were certified in the EU catch certificates issued by Senegal, but for that same year Senegal reported to ICCAT a total bigeye tuna catch of 92 tons for this fleet. No explanation on that discrepancy is included in Senegal's reply, although it casts major doubts on the integrity of the reporting by Senegal, since even catches that were subject to specific certification for export to the EU were not properly reported to ICCAT.

Second, the EU calls the attention of the COC on the statistical inconsistencies of the data reported by Senegal, especially when one compares the amount of BET per fishing day in exports to the EU with the amount of BET per fishing day in the rest of the catches reported by Senegal. Senegal dismisses the EU calls to clarify this data with a statement that there was no incentive to misreport their BET catch since, as of 2021, the BET catch was well below the quota allocated to Senegal. This argument leaves aside the fact that:

(a) as already mentioned, the data submitted by the EU clearly points at an overshoot of the 2021 quota;

¹ 702 tons from industrial vessels + 54 tons from artisanal vessels

² MSC, Initial Assessment, Public Certification Report, Capsen & Grand Bleu Atlantic Ocean purse seine skipjack and yellowfin tuna fishery, November 2024, p.120

³ Not to mention that the above-mentioned 802 tons do not include BET catches originating from fishing trips that started in 2021 and finished in 2022. Pro rata temporis distribution of these catches would add 62 tons to the 2021 catch.

(b) the number of purse seiners remained the same from 2018 to 2023, but these same vessels would have managed to move from an average annual catch of 2206 tons of BET before 2021 to an average annual catch of 719 tons after 2021.

(c) this 67% reduction of the BET catch would have been achieved while increasing at the same time by 52% the total purse seine catch, to the extent that BET would only represent 1.3% of catches made by these purse seiners.

Third, the EU cannot accept Senegal's dismissal of findings made by an EU Member State when the fisheries inspectors of that Member State inspected the catches made in 2024 by the pole and line vessel CAP ATLANTIQUE (exported to the EU in containers). While the catch certificates validated by Senegal referred to 32 tons of BET, the inspectors determined that there were actually 134 tons of BET in these catches. The EU does not accept that Senegal challenges these findings without any valid reason, and would like to recall that they were shared with Senegal already in March 2025, with a request to clarify the procedure to verify catches reported by operators and the sanctions imposed by Senegal. None of this has been received from Senegal, which in addition reports to ICCAT a total BET catch of only 125 tons for all pole-and-line vessels that operated in 2024.

In sum, the EU requests the COC to note that Senegal has failed to provide the clarifications that their BET catch data urgently called for, and directly undermined the process laid down in Recommendation 08-09. Instead of launching verifications on the inconsistencies reported by the EU, Senegal chose to generally refute any issue and the COC is now facing a situation where none of these inconsistencies have been clarified, in clear contradiction with objectives of the process laid down in Rec. 08-09.

The EU also insists very firmly on the need to have a scientific review of the purse seiner catches reported by Senegal, to assess the plausibility of their BET catch completely deviating from proportions found in other purse seine fleets.

Possible non compliance with ICCAT Recommendation 24-01 (FAD closure)

- On top of expected results of investigation carried out by Senegal, the EU requests Senegal to provide VMS data and logbook of SEA BREEZE for that fishing trip.

BFT reporting

- Senegal has been reporting 225 tons of BFT for 2024 (COC_304/2025) whereas in the document PA2_27/i2025 submitted in the ICCAT Panel 2 meeting that took place in March this year, the amount verified upon landing for catches made by the purse seiner GRANADA on 29 December 2024 was already 232 tons.
- Therefore, the EU requests clarifications from Senegal on that reporting.

To conclude:

- The critical failures identified in Senegal's implementation of its duties as Flag and Port State directly undermine the conservation and managements system established by ICCAT, and maintain disproportionate risk that fish harvested in clear violation of ICCAT rules is landed in Senegal and subsequently exported to ICCAT Contracting Parties.

- Considering the number of landings of tuna species that were made in Senegal by vessels which were not on the ICCAT Record of authorised vessels ⁴, the EU requests that non-compliance with Rec 23-17 is added to the list of issues identified under Rec. 06-13.

⁴ SAGE was already on IUU vessel list at time of landings, the other vessels were not on ICCAT register of authorized vessels.