

POTENTIAL NON-COMPLIANCES AND RESPONSES - BFT VESSELS ISSUES OF POTENTIAL NON-COMPLIANCE REPORTED BY OBSERVERS UNDER THE ICCAT REGIONAL OBSERVER PROGRAMMES

ICCAT Regional Observers Programme for eastern Atlantic and Mediterranean bluefin tuna – Vessels

<i>PNC No.</i>	<i>Request No.</i>	<i>Date reported</i>	<i>Date of PNC</i>	<i>CPCs</i>	<i>PNC</i>	<i>In potential contravention of</i>	<i>Clarifications / corrective action reported by Consortium</i>	<i>CPC Response</i>
1	000DZ058	2020-07-04	2020-02-02	Algeria	Following a transfer operation carried out on 2 June (transfer operation No. 6 linked to fishing operation No. 5). The quality of the video prevented the observer from estimating the number of tunas transferred.	Art 92, Annex 8, Rec. 19-04		An onboard and fishing-ground level estimate was made by the fishing authority inspector. However, a complementary investigation was expedited due to a contradictory analysis from the fishing authority inspectors onboard other tuna fishing vessels that are engaged in this campaign, with a verification by the Algerian fishing authority. The results of these analyses have shown that difference in number is under 10%, which is in line with the requirements established in the dispositions of Recommendation 19-04, paragraph 92. It is also suggested that the final check is conducted during the caging operation, when the number and weight of bluefin tuna will be estimated by using stereoscopic cameras or alternative methods that ensure the same level of accuracy. The result of this operation will be valid and may be considered as the reference point for a potential modification of the operators' declaration. In this context, the caging operation and use of stereoscopic cameras confirmed the number of fish.
2	000DZ062	2020-07-06	2020-02-02	Algeria	Two other vessels carried out independent transfer operations on the same day. In the catch allocation section of the corresponding page of the vessel's logbook, the captain reported the total catch volume from the two transfer operations deducted from the individual quota, without differentiating between the two.	Art 63, Annex 2, Rec. 19-04		The captain joined up the catches of two vessels xxx and yyy in the logbook. However, the captain corrected this error by noting the two catches separately in the logbook. Furthermore, this PNC was cancelled on 8 July 2020, as stated in the final report issued by the ROP.

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3	000DZ058	2020-07-12	2020-02-02	Algeria	After verifying the eBCD, the live weight indicated in section 3 (TRADE INFORMATION FOR LIVE FISH TRADE) indicates the weight of BFT live + dead (119,049.751 kg), instead of the weight of just transferred tunas (118,849.751 kg).	Rec. 19-04, Annex 8		A transcription error was noticed while elaborating the eBCD. This error was subsequently corrected.
1	000EU128	2020-06-01	2020-05-31	EU-Croatia	Following a transfer operation on 31 May, the video record of the transfer did not cover the entire transfer operation. Therefore, the observer was unable to make an independent estimate. The vessel did not request a voluntary control transfer and the ITD was not signed by the observer.	Para 92 and the minimum video standards established within Annex 8 vii of Rec. 18-02 / 19-04.		It is evident that the PNC is a result of lack of communication between the operator and RO, who was not informed of the request made by the operator for a voluntary control transfer. Namely, the video record of the first transfer was of insufficient quality to make an estimation of the number of BFT, which is why the operator requested that the flag authorities conduct a control transfer operation in line with paragraph 92 of Rec. 19-04. That request was accepted and a voluntary transfer – repeated first transfer - was done in agreement with fishery inspection on 3 June 2020 between the towing vessel xxxx III and the towing vessel xxx in the presence of control authorities – inspectors and RO deployed on the farm zzzz net farma d.o.o. The repeated first transfer (the control transfer) video was then assessed by the operator and fishery inspector, whereby the result of their counts was within 10%, and the ITD was signed by inspectors.
2	000EU043	2020-06-03	2020-06-02	EU-France	The vessel's allocation key was not correct in the logbook. At the beginning of the season, the allocation key was 5,4518. This was changed to 5,9106 after the season had started. This change was not reflected in the logbook.	Para 63 and Annex 2 of Rec. 18- 02/19-04.		At the request of France, for reasons of reconfiguration of the information systems, the allocation key was only officially validated and updated on the ICCAT site on Tuesday morning. French purse seiners making up JFO 2020-xxx therefore declared all their catches that had taken place before Tuesday morning according to the old allocation key, in accordance with the ICCAT decision.

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3	000EU029	2020-06-03	2020-06-02	EU-France	The vessel's allocation key was not correct in the logbook. At the beginning of the season, the allocation key was 6,0339. This was changed to 6,5420 after the season had started.	Para 63 and Annex 2 of Rec. 18-02/19-04.		At the request of France, for reasons of reconfiguration of the information systems, the allocation key was only officially validated and updated on the ICCAT site on Tuesday morning. French purse seiners making up JFO 2020-xxx therefore declared all their catches that had taken place before Tuesday morning according to the old allocation key, in accordance with the ICCAT decision.
4	000EU029	2020-05-26	2020-05-26	EU-France	The vessel's logbook includes the JFO number instead of the ICCAT vessel number.	Para 63 and Annex 2 of Rec. 18-02/19-04.		Recording of the vessel's ICCAT number is part of the initial configuration of the fishing logbook and, in the context of monitoring the reporting obligations of tuna seiners, the French authorities shall ensure that the information transmitted, including the ICCAT number and the JFO number of each vessel, is complete. The checks carried out since the beginning of the campaign confirm the correct transmission of this information for the vessel xxx
5	000EU101	2020-06-03	2020-05-31	EU-Italy	From 31 May to 1 June, the electronic logbook was not filled out by the captain while at sea, and he will be unable to fill it out afterwards. Because of the bad weather forecast, they came back to the port and turned off the e-logbook. They will not fill it in while at port	Para 63 and the logbook requirements established within Annex 2 of Rec. 18-02 / 19-04		From 30 May 2020 until 11 June 2020 the PS vessel xxx was in port. During navigation, the master shall report the relevant activities in the e-logbook, while in port the master shall continue to submit to us the daily catch report, but they do not need to complete the e-logbook.
6	000EU098	2020-05-27	2020-05-26	EU-Spain	Following a transfer operation on 26 May, the observer was unable to make an independent estimate of the amount of fish transferred due to the video quality. While the observer was also provided access to the stereoscopic video footage, which allowed an accurate and independent estimation, this video did not comply with other requirements established within the Recommendation, specifically that the transfer authorisation and the opening and closing of the gate were not shown.	Para 92 and the minimum video standards established within Annex 8 of Rec. 18-02 / 19-04.		An investigation was opened and the cage concerned blocked Following the investigation, it was determined that the video footage related to this split complied with the requirements established in Annex 8 of Rec 19-04

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0	000EU110	2020-06-04	2020-06-03 and onward	EU-Italy	This PNC is related to the whole JFO 2020-xxx and concerns about 10 non-identifiable small boats. Since 3 June, all the observers of the JFO have reported illegal fishing actions from these small boats, all around the purse seine net. An illegal fishing line set by these small boats was hauled by the purse seiner with the catch released. Their actions considerably complicate all the fishing and transfer operations of the purse seiners. According to the captains of the purse seiners, the authorities and coast guard are already aware of this problem.			This cannot be considered as a possible non-compliance of the concerned PS. It is clearly reflected in the comment of the RO when he/she stated that the crew members have retrieved some of the lines and released the fish. A patrol vessel was successfully deployed in the area to avoid the reiteration of such activities.
7	000EU124	2020-06-04	2020-06-03	EU-Croatia	Following a transfer operation on 3 June, the video record of the transfer did not cover the entire transfer operation. Therefore, the observer was unable to make an independent estimate.	Para. 92 Annex 8 vii (TLTO) of Rec. 19-04		It is evident that the PNC is a result of lack of communication between the operator and RO who was not informed of the request made by the operator for voluntary control transfer. Namely, the video record of the first transfer was of insufficient quality to make an estimation of the number of BFT, which is why the operator requested that the flag authorities conduct a control transfer operation in line with paragraph 92 of Rec 19-04. That request was accepted and a voluntary transfer - repeated first transfer - was done in agreement with fishery inspection on 7 June 2020 between the towing vessel xxx xxx and the towing vessel yyy in the presence of control authorities - inspectors and RO deployed on farm zzz d.o.o. The repeated first transfer (the control transfer) video was then assessed by the operator and fishery inspector, whereby the result of their counts was within 10%, and the ITD was signed by inspectors.

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8	000EU029	2020-05-26	2020-05-26	EU-France	The vessel's logbook includes the JFO number instead of the ICCAT vessel number.	Para 63/ Annex 2 18-02 / 19-04		Recording of the vessel's ICCAT number is part of the initial configuration of the fishing logbook and, in the context of monitoring the reporting obligations of tuna seiners, the French authorities shall ensure that the information transmitted, including the ICCAT number and the JFO number of each vessel, is complete. The checks carried out since the beginning of the campaign confirm the correct transmission of this information for the vessel.
9	000EU032	2020-06-10	2020-06-10	EU-France	The vessel's allocation key was not correct in the logbook. At the beginning of the season, the allocation key was 5,7552. This was changed to 6.2398 after the season had started. This change was not reflected in the logbook.	Para 63/ Annex 2 19-04		As explained twice, at the request of France, for reasons of reconfiguration of the information systems, the allocation key was only officially validated and updated on the ICCAT site on Tuesday morning. French purse seiners comprising this JFO therefore declared all their catches that took place before Tuesday morning according to the old allocation key, in accordance with the ICCAT decision. Reply from the Consortium. Thank you for this and previous emails. I understand the information provided; however, we are simply providing this information so that the French authorities can be aware of vessels whose allocation key has been changed during the season and so that the reports submitted will reflect the information contained at the time the observer examined them, rather than the changed number.
10	000EU128	2020-06-15	2020-06-14	EU-Croatia	The observer has reported that, following a transfer operation on 14 June, the video record of the transfer did not cover the entire transfer and did not show the closing of the door. Therefore, the observer was unable to make an independent estimate.	Para 92 Annex 8 vi and vii of Rec. 19-04		Investigation was launched and after a revision of video footage, it was confirmed that the video footage was not in line with Annex 8vii of Rec 19-04, and a corresponding action will be taken.



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14	000EU116	2020-06-17	2020-06-13	EU-Italy	Following a fishing operation on the 13 June, the vessel transhipped 266 dead BFT with an estimated weight of 53,907 kg to another Italian purse seiner, and 114 dead BFT with an estimated weight of 18,709 kg to a second Italian purse seiner.	Paragraph 3 def d & p and paragraph 77 of Rec. 19-04		It must be noted that the PNC has been pointed out only by the RO deployed on board the presumed donor PS xxx and not also by the ROs deployed on board the two presumed receiving PS yyy and zzz. In light of this, it could be very helpful for us to access the original detailed reports (as well as any other possible evidence), personally completed and signed, on 13/06/2020, by all the ROs involved. The fishing operation, performed on 13/06/2020, was carried out by the PS xxx, within the JFO 2020-xxx. As you know, the total catch could not be destined, anymore, for farming purposes and it was completely managed as dead BFT. Because of the unavailability of an authorized auxiliary vessel, as well as the exhausted stowage capacity on board the above catching vessel, the last two parts of the total catch, for a total amount of 380 dead BFT specimens were uploaded DIRECTLY FROM THE CATCHING NET TO THE OTHER PS yyy (266 dead BFT specimens) and zzz OPERATING (114 dead BFT specimens) WITHIN THE SAME JFO. The above operation was carried out in accordance with the ICCAT Recommendation and without prejudice to the current transshipment definition as set in the ICCAT framework. The 380 dead BFT specimens were regularly landed in the designated port of Salerno, where the whole operation was monitored by local inspectors, weighing and measuring all the landed dead specimens without detecting any critical issue. National observers were also present at the landing time, for scientific data collection purposes





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18	000EU168	2020-06-19	04-17/06/2020	EU-Italy	From 4 to 10 June, then from 14 to 17 June, the electronic logbook was not filled in by the captain while at port. The captain will be unable to fill it in afterwards and does not have the paper version	Para 63 Annex 2 of Rec. 19-04		All the concerned PS vessels are operating, for the current BFT season, within the same authorized JFO. In accordance with the current ICCAT (par. 63 RECs. 18-02 and 19-04) and EU framework (Reg. 2016/1627 and Control REGs), all the above PS vessels are fitted with an e-logbook, without any further obligation to also maintain a paper version. During both periods (4-10 June 2020 and 14-17 June 2020) pointed out in the PNCs, all the above PS vessels were at national ports (in Southern Italy). During navigation (and obviously in case of fishing operations), the concerned captains are duly compliant with the current e-logbook transmission obligations. Moreover, every day of the campaign (including those spent at port), they electronically submit (par. 65 RECs 18-02 and 19-04) to us the daily catch report (excel format relating to the whole JFO) and they also complete (in line with our internal maritime legislation) the paper nautical daily log. During the recent landing operations for dead BFT specimens, most of our PS fleet has been duly inspected by our relevant local Control Authorities, without any critical issue relating to the contents of these PNCs. In our opinion, there could be an interpretation discrepancy from the ROP side within the current wording of ICCAT RECs 18-02 and 19-04 Annex 2. Most probably, the sentence: "The logbook must be filled in every day (by midnight) or before port arrival." has been changed (interpreted) into: "The logbook must be filled in every day, by midnight or before port arrival." From a legal and literal point of view, the meaning of the two sentences seems to be quite different



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20	000EU103	2020-06-19	04-17/06/2020	EU-Italy	From 4 to 10 June, then from 14 to 17 June, the electronic logbook was not filled in by the captain while at port. The captain will be unable to fill it in afterwards and does not have the paper version	Para 63 Annex 2 of Rec. 19-04		All the concerned PS vessels are operating, for the current BFT season, within the same authorized JFO. In accordance with the current ICCAT (par. 63 RECs. 18-02 and 19-04) and EU framework (Reg. 2016/1627 and Control REGs), all the above PS vessels are fitted with an e-logbook, without any further obligation to also maintain a paper version. During both periods (4-10 June 2020 and 14-17 June 2020) pointed out in the PNCs, all the above PS vessels were at national ports (in Southern Italy). During navigation (and obviously in case of fishing operations), the concerned captains are duly compliant with the current e-logbook transmission obligations. Moreover, every day of the campaign (including those spent at port), they electronically submit (par. 65 RECs 18-02 and 19-04) to us the daily catch report (excel format relating to the whole JFO) and they also complete (in line with our internal maritime legislation) the paper nautical daily log. During the recent landing operations for dead BFT specimens, most of our PS fleet has been duly inspected by our relevant local Control Authorities, without any critical issue relating to the contents of these PNCs. In our opinion, there could be an interpretation discrepancy from the ROP side within the current wording of ICCAT RECs 18-02 and 19-04 Annex 2. Most probably, the sentence: "The logbook must be filled in every day (by midnight) or before port arrival." has been changed (interpreted) into: "The logbook must be filled in every day, by midnight or before port arrival." From a legal and literal point of view, the meaning of the two sentences seems to be quite different

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21	000EU102	2020-06-19	04-17/06/2020	EU-Italy	From 4 to 10 June, then from 14 to 17 June, the electronic logbook was not filled in by the captain while at port. The captain will be unable to fill it in afterwards and does not have the paper version	Para 63 Annex 2 of Rec. 19-04		All the concerned PS vessels are operating, for the current BFT season, within the same authorized JFO. In accordance with the current ICCAT (par. 63 RECs. 18-02 and 19-04) and EU framework (Reg. 2016/1627 and Control REGs), all the above PS vessels are fitted with an e-logbook, without any further obligation to also maintain a paper version. During both periods (4-10 June 2020 and 14-17 June 2020) pointed out in the PNCs, all the above PS vessels were at national ports (in Southern Italy). During navigation (and obviously in case of fishing operations), the concerned captains are duly compliant with the current e-logbook transmission obligations. Moreover, every day of the campaign (including those spent at port), they electronically submit (par. 65 RECs 18-02 and 19-04) to us the daily catch report (excel format relating to the whole JFO) and they also complete (in line with our internal maritime legislation) the paper nautical daily log. During the recent landing operations for dead BFT specimens, most of our PS fleet has been duly inspected by our relevant local Control Authorities, without any critical issue relating to the contents of these PNCs. In our opinion, there could be an interpretation discrepancy from the ROP side within the current wording of ICCAT RECs 18-02 and 19-04 Annex 2. Most probably, the sentence: "The logbook must be filled in every day (by midnight) or before port arrival." has been changed (interpreted) into: "The logbook must be filled in every day, by midnight or before port arrival." From a legal and literal point of view, the meaning of the two sentences seems to be quite different

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22	000EU105	2020-06-19	04-17/06/2020	EU-Italy	From 4 to 10 June, then from 14 to 17 June, the electronic logbook was not filled in by the captain while at port. The captain will be unable to fill it in afterwards and does not have the paper version	Para 63 Annex 2 of Rec. 19-04		All the concerned PS vessels are operating, for the current BFT season, within the same authorized JFO. In accordance with the current ICCAT (par. 63 RECs. 18-02 and 19-04) and EU framework (Reg. 2016/1627 and Control REGs), all the above PS vessels are fitted with an e-logbook, without any further obligation to also maintain a paper version. During both periods (4-10 June 2020 and 14-17 June 2020) pointed out in the PNCs, all the above PS vessels were at national ports (in Southern Italy). During navigation (and obviously in case of fishing operations), the concerned captains are duly compliant with the current e-logbook transmission obligations. Moreover, every day of the campaign (including those spent at port), they electronically submit (par. 65 RECs 18-02 and 19-04) to us the daily catch report (excel format relating to the whole JFO) and they also complete (in line with our internal maritime legislation) the paper nautical daily log. During the recent landing operations for dead BFT specimens, most of our PS fleet has been duly inspected by our relevant local Control Authorities, without any critical issue relating to the contents of these PNCs. In our opinion, there could be an interpretation discrepancy from the ROP side within the current wording of ICCAT RECs 18-02 and 19-04 Annex 2. Most probably, the sentence: "The logbook must be filled in every day (by midnight) or before port arrival." has been changed (interpreted) into: "The logbook must be filled in every day, by midnight or before port arrival." From a legal and literal point of view, the meaning of the two sentences seems to be quite different

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23	000EU103	2020-06-21	2020-06-19	EU-Italy	Following a fishing operation on 19 June, the vessel transshipped 181 dead BFT with estimated weight of 28,673 Kg to another Italian purse seiner xxx	Para 3 def d & p and Para 77 of Rec. 19-04		It must be noted that the PNC has been pointed out only by the RO deployed on board the presumed donor PS xxx and not also by the RO deployed on board the presumed receiving PS yyy. In light of this, it could be very helpful for us to access the original detailed reports (as well as any other possible evidence), personally completed and signed, on 19/06/2020, by both the ROs involved.- The fishing operation, performed on 19/06/2020, was carried out by the PS xxx, within the JFO 2020-0xx. As you know, the total catch could not be destined anymore, for farming purposes and it was completely managed as dead BFT.- Because of the unavailability of an authorized auxiliary vessel, as well as the exhausted stowage capacity on board the above catching vessel, the last part of the total catch, for a total amount of 181 dead BFT specimens, was uploaded DIRECTLY FROM THE CATCHING NET TO THE OTHER PS yyy OPERATING WITHIN THE SAME JFO. The above operation was carried out in accordance to the ICCAT Recommendation and without prejudice to the current transshipment definition as set in the ICCAT framework. The 181 dead BFT specimens were regularly landed in the designated port of Salerno, where the whole operation was monitored by local inspectors, weighing and measuring all the landed dead specimens without detecting any critical issue. National observers were also present at the landing time, for scientific data collection purposes

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24	000EU108	2020-06-20	2020-06-18	EU-Italy	Following a fishing operation on the 18 June, the vessel transhipped 154 dead BFT with an estimated weight of 31,550 Kg to another Italian purse seiner, and 61 dead BFT with an estimated weight of 12,283 Kg to a second Italian purse seiner.	Para 3 def d & p and Para 77 of Rec. 19-04		It must be noted that the PNC has been pointed out only by the RO deployed on board the presumed donor PS xxx and not also by the ROs deployed on board the two presumed receiving PS yyy and zzz. In the light of this, it could be very helpful for us to access the original detailed reports (as well as any other possible evidence), personally completed and signed, on 18/06/2020, by all the ROs involved. The fishing operation, performed on 18/06/2020, was carried out by the PS xxx, within the JFO 2020-xxx. As you know, the total catch could not be destined anymore, for farming purposes and it was completely managed as dead BFT. Because of the unavailability of an authorized auxiliary vessel, as well as the exhausted stowage capacity on board the above catching vessel, the last two parts of the total catch, for a total amount of 215 dead BFT specimens were uploaded DIRECTLY FROM THE CATCHING NET TO THE OTHER PS yyy (154 dead BFT specimens) and zzzz (61 dead BFT specimens) OPERATING WITHIN THE SAME JFO.- The above operation was carried out in accordance to the ICCAT Recommendation and without prejudice to the current transshipment definition as set in the ICCAT framework. The 215 dead BFT specimens were regularly landed in the designated port of Milazzo, where the whole operation was monitored by local inspectors, weighing and measuring all the landed dead specimens without detecting any critical issue. National observers were also present at the landing time, for scientific data collection purposes. National observers were also present at the landing time, for scientific data collection purposes
25	000EU111	2020-06-27	2020-06-25	EU-Italy	Following a transshipment operation on 25 June, the vessel transhipped 204 dead BFT with an estimated weight of 32,854 Kg to another Italian purse seiner	Para3 def d & p and Para 77 of Rec. 19-04		It must be noted that the PNC has been pointed out only by the RO deployed on board the presumed donor PS xxx and not also by the RO deployed on board the presumed receiving PS yyy P. In light of this, it could be very helpful for us to access the original detailed reports (as well as any other possible evidence), personally completed and signed, on 24/06/2020, by both the ROs involved. The fishing operation, performed on 24/06/2020 (and not on 25/06/2020), was carried out by the PS yyy, within the JFO 2020-xxx. As you know, the total catch could not be destined anymore, for farming purposes and it was completely managed as dead BFT. Because of the unavailability of an



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27	000EU114	2020-06-26	2020-06-25	EU-Italy	The entry in logbook No. 205 was wrong and cannot be corrected. The catching vessel indicated in the logbook was xxx instead of yyy	Para 63 and Annex 2 of Rec. 19-04		It is a clear mistake that has zero impact on the traceability of the catches since the remaining vessels within the same JFO filled in their logbook properly. Nevertheless, an administrative procedure will be launched against the master of the concerned vessel.
28	000EU168	2020-06-26	Throughout the deployment	EU-Italy	The observer reported during the debriefing that the electronic logbook did not work throughout the entire deployment. The captain was not able to fill it in and did not have a paper version	Para 63 Annex 2 of Rec. 19-04		Our ERS database shows that the concerned operator has complied, during the whole season, with the current e-log obligations. - During the whole season, the concerned vessel has not been deployed very much within the concerned JFO and it has spent several days in port. In particular VMS tracks shows the following stops: from 01/06 to 03/06 harbour of Cetraro, from 03/6 to 12/06 port of Salerno and from 13/06 to 19/06 port of Vibo Valentia. - The concerned JFO has terminated its total quota on 20/06 and during the whole season, the concerned operators submitted to us the daily catch report in accordance with the current framework.
29	000EU126	2020-07-01	29/06/2020 to 30/06/2020	EU-Croatia	The vessel's e-logbook stopped working and was unable to connect to the server, and therefore was not completed on 29 and 30 June 2020. In addition, fishing operation 11 (unsuccessful) occurred on 30 June 2020. This operation was therefore not entered into the logbook.	Para 63 and Annex 2 of Rec. 19-04 and Para 66 of Rec. 19-04	The vessel's captain intends to repair the e-logbook when the vessel is next in port.	In line with national and EU procedures, the operator reported the technical malfunction of the e-logbook and the subsequent reporting was done in accordance with the procedure. We understand that the RO is not familiar with national procedures in these cases and that he was not in a position to confirm all logbook entries at that time. However, after the technical malfunction was resolved and the logbook was repaired, all past entries were updated from the FMC data base. In general, a cross check of all logbook data of the campaign is done in real-time and at the end, follow up actions are taken in case of discrepancies.

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30	000EU122	2020-07-04	25/06/2020 to 30/06/2020, 02/07/2020, 03/07/2020	EU-Croatia	The vessel's e-logbook stopped working and was unable to connect to the server, and therefore was not completed from 25 June 2020. In addition, a number of fishing and transfer operations occurred within this time frame. These operations were therefore not entered into the logbook	Para 63 and Annex 2 of Rec. 19-04 and Para 66 of Rec. 19-04	The vessel's captain intends to repair the e-logbook when the vessel is next in port.	In line with national and EU procedures, the operator reported the technical malfunction of the e-logbook and the subsequent reporting was done in accordance with the procedure. We understand that the RO is not familiar with national procedures in these cases and that he was not in a position to confirm all logbook entries at that time. However, after the technical malfunction was resolved and the logbook was repaired, all past entries were updated from the FMC data base. In general, a cross check of all logbook data of the campaign is done in real-time and at the end, follow up actions are taken in case of discrepancies.
31	000EU107	2020-07-08	44001	EU-Italy	Following a fishing operation performed on 19 June, the vessel transhipped 106 dead BFT with an estimated weight of 19,918 Kg to another Italian purse seiner.	Para 3 def d & p and Para 77 of Rec. 19-04		In general, a cross check of all logbook data of the campaign is done in real-time and at the end, follow up actions are taken in case of discrepancies.
32	000EU131	2020-07-20	Various	EU-Croatia	The vessel had only recorded 81 allocated catches, while in total the JFO had 84 allocated catches.	Rec. 19-04; Para 63 / Annex 2		We understand that the RO is not familiar with all functionalities of the Croatian e-logbook, and it is not clear how the RO came to this conclusion and where the information on the number of catches came from. In general, a cross check of all logbook data during the campaign is done in real-time and at the end, follow up actions are taken in case of discrepancies. In this particular case, some discrepancies were confirmed but to a lesser extent than originally reported by the RO. However, a corresponding follow-up was done.
33	000EU130	2020-07-15	2020-06-17	EU-Croatia	Dead tuna that were transhipped between this vessel and another Croatian vessel on 17 June in potential non-compliance with Para. 77 of Recommendation 19-04 were also not recorded in the logbook by the vessel	Para 63, Annex 2 of Rec. 19-04		An on-board inspection was carried out on 23/06 and a non-compliance was confirmed. Based on that, follow-up actions were taken and the infringement procedure was launched.







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3	000TR072	2020-06-10	2020-06-09	Turkey	Following a transfer operation on 9 June, the video record was not continuous. Therefore, the observer was unable to make an independent estimate.	Para 92 and Annex 8 vii of Rec. 18-02 / 19-04		The Turkish Ministry of Agriculture and Forestry (MoAF) initiated an investigation with respect to the PNC reported with an official notification to the concerned operator. The video footage of the concerned transfer has been demanded from the operator and, in any case, without finalizing the investigation MoAF has instructed the operator to conduct “a control transfer” under the supervision of an ICCAT regional observer and accompanying MoAF inspectors before caging. Also, the eBCD belonging to this operation conducted by the vessel has not been validated by our authority until a control transfer has been conducted by the operator. As a result of detailed examination carried out by the MoAF inspectors on the video footages of the relevant operation, an unidentified outage considered to be a camera error has been confirmed. A control transfer under the supervision of an ICCAT regional observer and MoAF inspectors has been conducted in the vicinity of the relevant BFT farming facility before the associated caging operation took place. MoAF did not conclude any serious infringements, suspicious or illegal activities. During the subsequent control transfer and caging, no fish exceeding the declared quota/amount of fish transferred was determined by MoAF.

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4	000TR091	2020-06-15	2020-06-12	Turkey	Following a transfer operation on 12 June, the video record was not of sufficient quality to make an independent estimate	Para 92 and Annex 8 ix of Rec. 19-04		The Turkish Ministry of Agriculture and Forestry (MoAF) initiated an investigation with respect to the PNC reported with an official notification to the concerned operator. The video footage of the concerned transfers has been demanded from the operator and, in any case, without finalizing the investigation MoAF has instructed the operator to conduct "a control transfer" accompanying with MoAF inspectors before caging. Also, the eBCD belonging to this operation conducted by the vessel has not been validated by our authority until a control transfer has been conducted by the operator. The operator indicated and confirmed that since the BFTs has spawn during the transfer operation, the visibility has decreased accordingly. As a result of the detailed examination carried out by the MoAF inspectors of the video footage of the relevant operation, it was confirmed that the visibility conditions were poor for estimating the amount of fish. A control transfer under the supervision of an ICCAT regional observer and MoAF inspectors has been conducted in the vicinity of the relevant BFT farming facility before the associated caging operation took place. During the subsequent control transfer and caging, no fish exceeding the declared quota/amount of fish transferred was determined by MoAF.
5	000TR071	2020-06-15	2020-06-11	Turkey	Following a fishing operation on 11 June, there was no logbook entry made for a fishing operation (successful or not) before 09:00 the following day.	Rec. 19-04; Para 66		The Turkish Ministry of Agriculture and Forestry (MoAF) initiated an investigation with respect to the PNC reported with an official notification to the concerned operator. The operator confirmed that a delay has occurred due to the intense fishing operation, bad sea conditions and lack/inefficiency of internet connection on that date. In parallel with the explanation made by the operator and examination of the related logbook it has been observed that necessary information was entered in the logbook for that operation.



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8	000TR070	2020-06-15	2020-05-26	Turkey	Following a transfer operation on 29 May 2020, the observer was unable to make an independent estimate due to insufficient video quality	Para 92 and Annex 8 viii of Rec. 19-04		The Turkish Ministry of Agriculture and Forestry (MoAF) initiated an investigation with respect to the PNC reported with an official notification to the concerned operator. The video footage of the concerned transfers has been demanded from the operator and, in any case, without finalizing the investigation MoAF has instructed the operator to conduct “a control transfer” accompanied by MoAF inspectors before caging. Also, eBCD belonging to this operation conducted by the vessel has not been validated by our authority until a control transfer has been conducted by the operator. The operator indicated and confirmed that since the BFT have spawn during the transfer operation, the visibility has decreased accordingly. As a result of detailed examination carried out by the MoAF inspectors on the video footage of the relevant operation, it was confirmed that the visibility conditions were poor for estimation of the fish amount. A control transfer under the supervision of an ICCAT regional observer and MoAF inspectors has been conducted in the vicinity of the relevant BFT farming facility before the associated caging operation took place. During the subsequent control transfer and caging, no fish exceeding the declared quota/amount of fish transferred was determined by MoAF.



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11	000TR015	2020-06-18	2020-06-18	Turkey	During a fishing operation on 18 June 2020, a dead tuna (length 132cm, weight 48kg) was not recorded in the logbook.	Rec. 19-04 Annex 11		The Turkish Ministry of Agriculture and Forestry (MoAF) initiated an investigation with respect to the PNC reported with an official notification to the concerned operator. The operator confirmed that inadvertently 1 piece of dead bluefin tuna have not been recorded on the vessel's logbook and eBCD. The operator has received an official warning. 1 piece of dead bluefin tuna corresponding to 43 kg has been released to the sea by the operator accompanied with the Regional Observer from cage numbered TUR-SAG-2020-xxx before caging in the farm and this has been proceed on eBCD numbered TR20900149. MoAF checked, in detail, the logbook and ITD documents of this fishery and did not conclude any serious infringements, suspicious or illegal activities.
12	000TR018	2020-06-19	2020-06-14	Turkey	During a fishing operation on 14 June 2020, two dead tunas were not recorded in the logbook and the eBCD. The related eBCD number was TR20900127, the related logbook number was 0848057 and the related ITD number was TUR-2020/xxx/ITD.	Rec. 19-04 Annex 11		The Turkish Ministry of Agriculture and Forestry (MoAF) initiated an investigation with respect to the PNC reported with an official notification to the concerned operator. The operator confirmed that inadvertently 2 pieces of dead bluefin tuna have not been recorded on the vessel's logbook and eBCD. The operator has received an official warning. 2 pieces of dead bluefin tuna corresponding to 80 kg have been released to the sea by the operator accompanied with the Regional Observer from cage numbered TUR-SAG-2020-xxx before caging in the farm and this has been proceed on eBCD numbered TR20900127. MoAF checked, in details, the logbook and ITD documents of this fishery and did not conclude any serious infringements, suspicious or illegal activities.
13	000TR015	18/06/2020	19/06/2020	Turkey	For a transfer operation on 18/06/2020, the incorrect logbook number was recorded on the ITD. On the ITD, the logbook number was recorded as 1581212, whereas the correct logbook number should be 1581217.	Paragraph 89 and Annex 4 of Recommendation 19-04		Turkish Ministry of Agriculture and Forestry (MoAF) initiated an investigation in respect to the PNC reported with an official notification to the concerned operator. The operator confirmed it has been understood through Observer report that the logbook number ending with "7" inadvertently written as ending with "2". As a result of investigation, it is seen that correct logbook number (1581217) has been recorded on the ITD belonging that transfer operation. MoAF checked, in details, the logbook and ITD documents of this fishery and did not conclude any serious infringements, suspicious or illegal activities.

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14	000TR012	2020-06-23	2020-06-13	Turkey	On 13 June, a successful fishing operation (fishing operation 12) was performed, and the associated transfer operation (transfer operation 6) was completed by 21:06 on 13 June. However, the logbook was not completed until 23:40 on 14 June	Para 63 and Annex 2 of Rec. 19-04 and para 66 of Rec. 19-04		The Turkish Ministry of Agriculture and Forestry (MoAF) initiated an investigation with respect to the PNC reported with an official notification to the concerned operator. The operator confirmed that a delay has occurred due to the intense fishing operation and bad sea conditions on that date. In parallel with the explanation made by the operator and examination of the related logbook it has been observed that necessary information was entered in the logbook for that operation. MoAF checked, in detail, the logbook and ITD documents of this fishery and did not conclude any serious infringements, suspicious or illegal activities.
15	000TR066	2020-06-23	21-22/06/2020	Turkey	On 21 June 2020, the incorrect date was entered into the logbook and the eBCD for fishing operation 11 and the associated transfer operation 3. The operations occurred at night and crossed midnight of 21 June 2020 into the early hours of 22 June 2020.	Para 63 and Annex 2 of Rec. 19-04		The Turkish Ministry of Agriculture and Forestry (MoAF) initiated an investigation with respect to the PNC reported with an official notification to the concerned operator. The operator indicated that according to the record of the vessel the fishing operation has been finalized and saved at 00:05 on 22.06.2020 and related eBCD has been issued accordingly. The operator also stated that after completion of all procedures the Regional Observer informed that he recorded the time of fishing as 23:45 (21.06.2020). It seems that there exists a 20 minutes difference between two records as well as the difference in the dates. Parallel with the explanation made by the operator and examination of the related logbook it has been observed that necessary information was entered in the logbook for that operation. MoAF checked, in detail, the logbook and ITD documents of this fishery and did not conclude any serious infringements, suspicious or illegal activities.

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16	000TR068	2020-06-24	18-20/06/2020	Turkey	On 18 and 20 June 2020, no log book entry was made. The delay in transmission of this PNC was due to limited internet connectivity on the vessel	Para 63 and Annex 2 of Rec. 19-04		The Turkish Ministry of Agriculture and Forestry (MoAF) initiated an investigation with respect to the PNC reported with an official notification to the concerned operator. The operator confirmed that the vessel's skipper recorded both fishing operations conducted on 18.06.2020 and 20.06.2020 for this JFO on 20.06.2020 in the vessel's logbook due to the intense fishing under that JFO. As a result of investigation, it was observed that the case is not "no entry" but a delayed entry and necessary information was entered in the logbook for that operation. MoAF checked, in detail, the logbook and ITD documents of this fishery and did not conclude any serious infringements, suspicious or illegal activities.
17	000TR069	2020-07-01	26-28/06/2020	Turkey	During debriefing, the observer reported that on 26, 27 and 28 May 2020, no logbook entry was made	Rec 19-04, Para 63 and Annex 2		The Turkish Ministry of Agriculture and Forestry (MoAF) initiated an investigation with respect to the PNC reported with an official notification to the concerned operator. The operator confirmed that inadvertently no logbook entry has been made for those days. As a result of investigation, the operator has been punished by MoAF with an administrative fine for an amount in accordance with the related articles of Turkish Fisheries Law No.1380 (including a one-month suspension of the fishing license). MoAF checked, in detail, the logbook and ITD documents of this fishery and did not conclude any serious infringements, suspicious or illegal activities.
18	000TR092	2020-07-02	16/05-12/06 2020	Turkey	The vessel did not enter details of the unsuccessful fishing operations 2, 3, 4, 6, 8, 9, 10, 12, 13 and 14 in the logbook.	Rec. 19-04, Para 66		The Turkish Ministry of Agriculture and Forestry (MoAF) initiated an investigation with respect to the PNC reported with an official notification to the concerned operator. The operator confirmed that inadvertently no logbook entry has been made for those days. As a result of investigation, the operator has been punished by MoAF with an administrative fine for an amount in accordance with the related articles of Turkish Fisheries Law No.1380 (including a one-month suspension of the fishing license). MoAF checked, in detail, the logbook and ITD documents of this fishery and did not conclude any serious infringements, suspicious or illegal activities.

