

Original: English, Spanish

Information received under Rec. 08-09 and responses

The *Recommendation by ICCAT to Establish a Process for the Review and Reporting of Compliance Information [Rec. 08-09]* provides that CPCs, as well as 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 Environmental Justice Foundation (EJF) and the European Union. The Chair of the Compliance Committee has agreed that these can be accommodated on the 2024 Agenda.

This document comprises the following:

Allegations received:

- A. EJF - Potential illegal fishing in the area under the competence of ICCAT
- B. European Union – Possible non-compliance by ICCAT CPCs.

Responses to allegations received:

1. Response from Brazil to EJF on Potential illegal fishing in the area under the competence of ICCAT (documents A) and eight annexes to same.
2. Response from Chinese Taipei to European Union on possible non-compliance (document B above).
3. Response from The Gambia to European Union on possible non-compliance (document B above) and eight annexes to same.
4. Response from Guyana to European Union on possible non-compliance (document B above) and two annexes to same.
5. Response from China to European Union on possible non-compliance (document B above).
6. Response from Namibia to European Union on possible non-compliance (document B above) and four annexes to same.
7. Response from Panama to European Union on possible non-compliance (document B above).

A. EJF -Potential illegal fishing in the area under the competence of ICCAT

ENVIRONMENTAL
JUSTICE
FOUNDATION (EJF)

10 August 2023

Vessel Activity Notification

Potential unauthorised fishing the International Commission for the Conservation of Atlantic Tunas (ICCAT) Convention Area by the fishing vessel RIO POTENGI


The Environmental Justice Foundation (EJF) exists to protect the natural world and defend our basic human right to a secure environment.

EJF works internationally to inform policy and drive systemic, durable reforms to protect our environment and defend human rights. We investigate and expose abuses and support environmental defenders, Indigenous peoples, communities and independent journalists on the frontlines of environmental injustice. Our campaigns aim to secure peaceful, equitable and sustainable futures.

EJF is committed to combating illegal, unreported and unregulated (IUU) fishing. To this end, EJF gathers information on fishing vessels' activities through the use of Starboard and other online platforms that allow for the observation of vessels equipped with an Automatic Identification System (AIS).

Intelligence indicates that a fishing vessel ('RIO POTENGI') reportedly flying the flag of Brazil may have engaged in fishing in the area under the competence of ICCAT while not on the ICCAT record of vessels.

Vessel identity¹

<i>Vessel name</i>	<i>Vessel type</i> ²	<i>Vessel flag</i>	<i>IMO</i>	<i>Length Overall (LOA)</i> ³	<i>MMSI</i>	<i>Owner</i>
RIO POTENGI	Longliner	Brazil 	869645 3	23.9m	710001955	Oceano Pesca Imp E Exp Ltda (Brazil)

¹Information obtained from IHS-Seaweb, unless specified otherwise. Accessed 09.08.2023, <https://www.maritime.ihs.com> (subscription required).

² Information obtained from the Global Record of Fishing Vessels, Refrigerated Transport Vessels and Supply Vessels. Accessed 09.08.2023, <https://globalrecord.fao.org/vessels/view/da137d90-92e4-4168-ac55-1b7fdffdfb13>

³ *Ibid.*

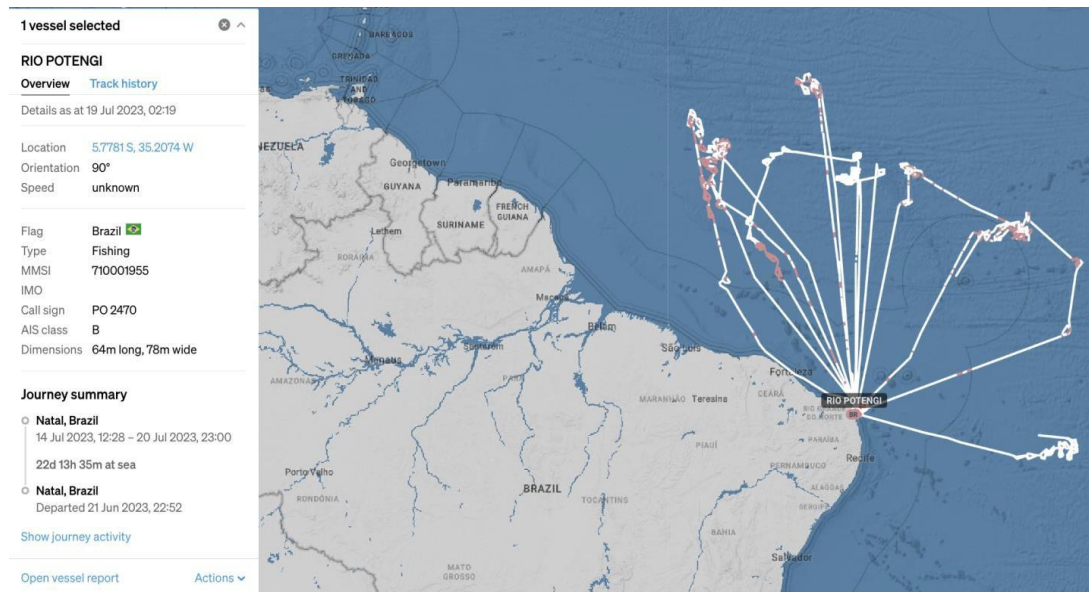
Vessel Activities

Using satellite-based tracking systems that allow for the observation of vessels equipped with AIS, EJF identified that the vessel RIO POTENGI may have engaged in fishing in the high seas of the Western Central, Eastern Central and Southwest Atlantic (FAO major fishing areas 31, 34 and 41), areas under the competence of ICCAT, between 01 January and 09 August 2023.

EJF believes that the AIS signals reportedly transmitted from the high seas of FAO 31, 34 and 41 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). As such, these activities may fall under the competence of ICCAT. EJF particularly notes that the AIS signals transmitted could be suggestive of longlining activities with patterns of lines being set and later hauled⁴. EJF also notes that the signals were reportedly transmitted from known longline fishing grounds for tuna and tuna-like species⁵.

At the time of writing this notification (9 August 2023, 09:48 UTC), the last AIS signal available transmitted by the RIO POTENGI was on 09 August 2023 at 1.1525N, 29.7729W, in the Brazilian EEZ at a reported speed of 9.1 knots.

*Track of the vessel from Starboard.nz (available upon request).
Red lines indicate that the platform's algorithm detects
fishing activity, white lines indicate that the platform's algorithm detects the vessel is in transit.*



⁴ 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>.

⁵ ICCAT (2023) Statistical Bulletin, Vol. 48 (1950-2021), 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/SB48-2023/s4.html>.

Potential breaches to ICCAT rules

In accordance with paragraph 1 of ICCAT Recommendation 21-14, the 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 or species taken in association with those species”⁶. As previously mentioned, EJF found that the vessel RIO POTENGI, although reported to be greater than 20 metres in length overall, is not included in ICCAT’s record of vessels currently available from the regional fisheries management organisation website⁷. The vessel does however appear on ICCAT’s list of inactive vessels - which further supports EJF’s hypothesis that the vessel is targeting tuna and/or tuna-like species⁸.

Upon further investigation, should the activities described in this notification have taken place, they may fall under paragraph 1(a) of ICCAT Recommendation 21-13 which provides that: “vessels [...], are presumed to have carried out [IUU] fishing activities in the ICCAT [...] 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”⁹.

<i>Alleged activity</i>	<i>Possibly infringed CMMs</i>
Engaging in fishing activities in ICCAT while not in ICCAT’s record of vessels	Paragraph 1(a) of ICCAT Recommendation 21-13

Recommendations

EJF recommends that **Brazil**:

- 1) Clarifies the situation of the vessel concerned by this notification vis-à-vis ICCAT.
- 2) Ascertains the nature of the vessel’s activities using all possible means (e.g., VMS data, logbook data, observer reports, port inspections, etc.).
- 3) If the vessel was found to have engaged in fishing activities, ascertains whether or not these actions were conducted in accordance with all relevant international, regional and national CMMs.
- 4) If the vessel was found to have operated in breach of the applicable CMMs or any other applicable rules, take appropriate enforcement action.

In addition, EJF recommends that **Brazil** ensures that all of its submitted information in the FAO Global Record of Fishing Vessel, Refrigerated Transport Vessels and Supply Vessels is comprehensive and kept up to date. Brazil should also consider implementing the broader set of recommendations in the Global Charter for Transparency.

⁶ ICCAT, Recommendation by ICCAT amending recommendation 13-13 concerning the establishment of an ICCAT Record of Vessels 20 metres in length overall or greater authorized to operate in the Convention Area, accessed 09.08.2023, <https://www.iccat.int/Documents/Recs/compendiopdf-e/2021-14-e.pdf>.

⁷ ICCAT, ICCAT Record of Vessels, accessed 09.08.2023, <https://www.iccat.int/en/VesselsRecord.asp>.

⁸ ICCAT, ICCAT Record of Inactive Vessels, accessed 09.08.2023, <https://www.iccat.int/en/Vesexport.asp?vStatus=2>

⁹ ICCAT, Recommendation by ICCAT on Establishing a List of Vessels presumed to have Carried out Illegal, Unreported and Unregulated Fishing Activities, accessed 09.08.2023, <https://www.iccat.int/Documents/Recs/compendiopdf-e/2021-13-e.pdf>.

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

- 1) Consider this information under Recommendation 08-09¹⁰.
- 2) Confirm that the fishing vessel concerned by this notification was not included in its record of active vessels for the period mentioned in this notification.
- 3) Contact the country concerned by this notification to seek clarification on the status of this vessel and the nature of its potential activities vis-à-vis ICCAT as well as to stay abreast of the findings of the verifications this notification may trigger.

¹⁰ ICCAT, Recommendation by ICCAT to establish a process for the review and reporting of compliance information, accessed 9 august 2023, <https://www.iccat.int/Documents/Recs/compendiopdf-e/2008-09-e.pdf>.

B. European Union – Possible non-compliance by ICCAT CPCs

EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

International Ocean Governance and Sustainable Fisheries
Regional Fisheries Management Organisations

Brussels
MARE.B2/SH/Ares(2024)

Mr Camille Jean Pierre MANEL Executive
Secretary to ICCAT Corazón de María, 8
E - 28002 MADRID

Subject: EU report on ICCAT requirement M : GEN 27- Data on non-compliance

Dear Mr Manel,

In accordance with ICCAT Recommendation 08-09 and with a view to facilitating the discussion of these issues during the next meetings of the Compliance Committee and the PWG, the European Union (EU) would like to request the comprehensive investigation of the following possible non-compliances with ICCAT Conservation and Management Measures.

The EU underlines that some of the requests made hereinafter are repetitions of requests already made last year, and which have been left unanswered by the CPCs concerned. Paragraph 3 of ICCAT Recommendation 08-09 is clear that “CPCs *shall, consistent with domestic laws, provide the Executive Secretary with the findings of any investigation taken in relation to the allegations of non-compliance and any actions taken to address compliance concerns at least 30 days before the annual meeting*” and that “*if such investigation is ongoing, CPCs shall advise the Executive Secretary of the expected length of the investigation and provide periodic updates in their progress until completed*”, the EU requests that in the event of a new failure to comply with this obligation the Compliance Committee takes appropriate action vis-a-vis the CPCs concerned.

1) Senegal

Further to the exchanges that took place last year and to the information provided in Document COC_312_ANNEX 1 (2023), the EU would like to inform the ICCAT Secretariat and CPCs that the catch certificates validated by the competent authorities of Senegal as well as the ICCAT statistical documents (SDs) associated with the illegal exports from Senegal have been transmitted to Senegal on 29 May 2024, following the commitment taken by the EU during the 2023 ICCAT Compliance Committee.

In more details, the EU has transmitted the catch certificates received from Senegal for the years 2013 to 2020 for albacore tuna, and the catch certificates and SDs for the years 2016 to 2020 for swordfish. The EU would like to highlight that the quantities included in these catch certificates and SDs confirm the general accuracy of the figures mentioned in Tables 1 and 2 of the Document COC_312_ANNEX 1, and requests from Senegal a comprehensive investigation of this fraud.

In addition, further to previous requests for investigation¹, the EU reiterates its request for Senegal to provide:

- a comprehensive report on the activities and catches landed by the fishing vessels MARIO 7, MARIO 11, MAXIMUS and LISBOA from 2019 to 2020;

¹ ICCAT Documents COC_312A/2022, COC-312A_ADD_3/2022 and COC_312/2023.

- the detailed list of port calls made in Dakar by the FV SAGE, RICOS NO.3, RICOS NO. 6 and MEGA NO.2, as well as the details of the catches they landed. At this stage the information provided by Senegal does not include the dates of these calls (arrival and departure) nor the quantities landed, whereas the latter information should be part of the advance requests for port entry that Senegal received for each of these calls (ICCAT Recommendation 12-09, points 11 (e) and (f) and ICCAT Recommendation 18-09, points 13 (e) and (f));
- clarifications on the fact that the International Telecommunication Union MARS database includes, in the update provided by Senegal on 30 November 2020, two vessels under the name OCEAN STARI 1 (call sign 6WNG, MMSI 663228000) and OCEAN STARI 2 (call sign 6WNH, MMSI 663229000). Considering the similarity of these names with the IUU-listed vessel OCEAN STAR NO. 2 and its sister ship OCEAN STAR NO. 1, exact match of the gross tonnage as well as potential connections in the ownership of these two sets of vessels, the EU requests clarifications on the dates of registration of the vessels OCEAN STARI 1 and OCEAN STARI 2 under Senegalese flag, their IMO number, their previous flag, and the type of fishing activities these vessels engaged in.

2) The Gambia

The EU is seeking since 2022 information from The Gambia on the origin of the yellowfin tuna, bigeye tuna and swordfish that was fraudulently exported to the EU in 2020 and 2021 (Document COC_312A/2022, Appendix 5). Until now this information has not been provided by The Gambia, which despite several reminders is still to clarify the relevance of the documents that it shared with the EU in November 2023 (main company involved in the illegal exports to the EU is absent from these documents, and there are major inconsistencies in terms of dates, route or species).

The EU consequently reiterates, for the third year in a row, its request to receive from The Gambia comprehensive information on the origin of the fish that was fraudulently exported to the EU.

The EU also notes that although The Gambia reported that the vessels LUCAS and KIKI (IUU listed vessels, former Senegalese-flagged vessels MAXIMUS and LISBOA²), were deregistered on November 10, 2023, the IMO Global Integrated Shipping Information System (GISIS) still refers to The Gambia as Flag State of the two vessels (verification performed on July 1, 2024). The EU requests The Gambia to proceed with the necessary clarifications.

Finally, the EU notes that The Gambia did not reply to questions raised in document COC_312/2023 on the vessel LUCCIA (IMO 8017762, former Senegalese flagged tuna longliner DIAMALAYE 1909). Considering that the vessel was built as a tuna longliner, that it is currently not on the ICCAT record of authorised vessels and that its last known owner is the Senegalese company that had three vessels placed on the IUU list in 2020 and 2022, the EU requests clarifications on the activities of the vessel since it was registered under Gambian flag and on the control measures that The Gambia has established to ensure that the vessel cannot engage in unauthorised tuna fishing or fishing-related activities.

3) Angola

In the framework of 2023 ICCAT annual meeting, the EU provided information in relation to an overshoot of its Southern swordfish quota (S-SWO) by Angola.

As mentioned in document COC_312/2023, a verification of the exports made by the vessel DEMERSAL 9 shows that it exported to the EU a total quantity of 134.6 tons of swordfish³ and that these catches were made from March 2022 to 5 January 2023. According to the EU catch certificates and ICCAT statistical documents validated by the competent authorities of Angola, the fishing area of the vessel was FAO 47, and therefore the catches were Southern SWO (S-SWO). In 2022 the annual quota of S-SWO allocated to Angola pursuant to Recommendation 21-03 was 100 tons.

² <https://www.iccat.int/en/IUUlist.html>

³ Live weight equivalent calculated on the basis of the dressed weight mentioned in the ICCAT Swordfish statistical documents validated by Angola (total dressed weight in SDs 102 356 kg, ICCAT conversion factor 1.3158; 102 356 * 1,3158 = 134 680 kg).

In addition, the EU notes that Angola's Task 1 data (as accessed on July 1, 2024) still reports that Angola's total swordfish catch in 2022 was 74.38 tons. The EU requests Angola to correct this data and to clarify why these corrections were not already performed (all evidence and information was shared with Angola in 2023).

The EU also requests Angola to clarify why an ICCAT swordfish statistical document was validated for the export of this fish whereas the total annual catch of the vessel exceeded the country national quota. In addition, the EU would like to hear from Angola about the measures that Angola has taken to avoid the repetition of a similar issue.

4) Namibia

The EU would like to receive further information from Namibia in relation to the activities of vessel HALIFAX (IMO 8529533, ICCAT serial number 20200011) since its delisting from the ICCAT IUU list in November 2023. The EU notes that the vessel has not been reinstated on the ICCAT record of authorised vessels since its delisting (verification performed on July 1, 2024) and would consequently appreciate that Namibia confirms the vessel's current status and activities.

The EU also notes that the vessel still appears as Senegalese-flagged in the IMO Global Integrated Shipping Information System (GISIS), and would invite Namibia to proceed with the necessary updates.

In addition, the EU would like to receive clarifications on the current gear type of the vessel BLUEFIN (IMO 8529521) since the EU understanding was that the vessel had been refitted as a pole and line vessel but it is currently declared as a longliner in the ICCAT Record of vessels.

5) Chinese Taipei

The EU would appreciate receiving an update from Chinese Taipei in relation to the investigations carried out on the vessel MARIO 11 (Document PWG_405/2023, Attachment 1).

The EU would also appreciate receiving an update from Chinese Taipei on whether the fine imposed on the owner of FV SAGE has been paid.

6) South Africa

The EU reiterates its questions in relation to importations by South Africa of tuna species caught by the (at the time) IUU listed vessel HALIFAX (flag Namibia, IMO 8529533).

Extract from document COC_312/2023:

"As mentioned last year (*ref.* COC_306B/2022), 59 tons of tuna caught by this vessel have been exported from Namibia to South Africa. Pursuant to ICCAT Recommendation 21-13, "*CPCs shall take all necessary measures, under their applicable legislation to [...] prohibit the import [...] of tuna and tuna-like species from vessels included in the IUU list*". The EU requests clarifications from South Africa on the reasons why these importations were accepted by South Africa, the corrective measures taken to ensure that this situation will not re-occur, and the sanctions taken by South Africa towards the company that made these imports".

The EU noted replies provided by South Africa under COC_309/2023, but would be grateful to receive information on:

- (a) The mechanism which is in place in South Africa to avoid imports from vessels on the IUU list (the vessel and its IMO number were on the ICCAT IUU list, and yet the imports were accepted);
- (b) The corrective measures that South Africa has adopted to avoid the repetition of this issue;

(c) The sanctions that have been imposed on the importer and the final destination of the fish (information provided by South Africa in COC_309/2023 refers to the fish being “isolated pending the outcomes of the investigation on this matter”).

7) Cabo Verde

The EU reiterates the questions raised in the document COC_312/2023, as Cabo Verde did not reply to these questions last year nor in the course of the year, despite several bilateral reminders sent by the EU.

Extract from document COC_312/2023:

“Information collected by the EU demonstrates that Cape Verde issued in December 2022 a licence to fish for tuna species to the longliner MUNCRECA (flag Cape Verde, IMO 8706301) but that the vessel was not subsequently included in the ICCAT record of authorised vessels, in contravention with Recommendation 21-14 paragraph 2 (“*Each CPC shall submit to the ICCAT Executive Secretary, the list of its LSFVs that are authorized to operate in the Convention area*”).

Cabo Verde only requested this inclusion in May 2023, after the EU detected this contravention of Recommendation 21-14.

The EU would like to receive clarifications from Cape Verde on the reasons why a vessel that was not in the ICCAT Record of authorised vessels has been authorised to fish for tuna and tuna-like species from December 2022 to May 2023, and more generally on how Cape Verde ensures that any vessel exceeding 20 m LOA and fishing for tuna is appropriately registered with ICCAT. The EU would like to recall that pursuant to paragraph 1 of Recommendation 21-14, “*LSFVs not entered into the record are deemed not to be authorized to fish for, retain on board, transship or land tuna and tuna-like species or species taken in association with those species*”.

The EU cannot exclude requesting the IUU listing of the vessel, in accordance with Recommendation 21-13.”

Cape Verde’s lack of reply leaves the EU very unclear as to the mechanisms that have been developed by Cape Verde to ensure that all vessels beyond 20 meters are properly registered with ICCAT, and therefore as to the possibility that other vessels might be in the same situation as the one identified for the longliner MUNCRECA (fishing for tuna species in the ICCAT Convention area with a licence from Cape Verde, but without registration in ICCAT pursuant to Recommendation 21-14). Cabo Verde only requested this inclusion in May 2023, after the EU detected this contravention of Recommendation 21-14.

8) China

The EU notes with concerns the reply provided by China under COC_312/2023 that “*the investigation on certain Chinese national [suspected to be involved in IUU activities] is beyond the function of fisheries authorities of China and there is no legal basis in China according to existing laws and regulations to conduct such investigation*”, which entails that beyond confirming the nationality of the said national China “*couldn’t take any legal action and get any more relevant information*”.

The EU would be grateful for a clarification from China on how it intends to implement, in view of the above, ICCAT Recommendation 22-14. The EU underlines that the obligation for CPCs to investigate and to take appropriate actions is not new, and was already binding under ICCAT Recommendation 06-14, which entered into force in 2007. The EU also highlights that obligations established in ICCAT Recommendation 22-14 are binding upon CPCs, independent of their internal administrative organisation. The fact that “*the investigation on certain Chinese national is beyond the function of fisheries authorities of China*” is therefore irrelevant as the obligation lies with the CPC and not one specific ministerial department.

The EU calls on China to address this issue in full consistence with the zero-tolerance attitude to combat IUU fishing described under COC_312/2023 (page 79), and to report to the COC on how it intends to address (sanctions included) the issue of Chinese nationals engaging in IUU fishing activities through vessels flagged to third countries.

The EU would also like to request China to confirm whether the ICCAT IUU-listed vessels ISRAR 2 and 3 (former RICOS No. 6 and RICOS No. 3) are still under the ownership of a Chinese national, and in that respect draws the attention of China on the information released by Oman and published by the ICCAT Secretariat under PWG_405_Annex1/2023. In this document as well, reference is made to Chinese ownership of the former RICOS No. 3 and 6, and the information provided by Oman also points at Chinese beneficial ownership of the IUU-listed vessel ISRAR 1 (former MEGA No. 2).

9) Belize

The EU notes with concerns the information provided by Belize under document COC_312/2023, and more specifically the decision to strike off the company from the Belize Companies Registry whereas an investigation on the company was ongoing, especially if as indicated by Belize in the same document *“the removal of this company from the Register effectively ends Belize’s jurisdiction over the company and its owners; therefore, restricting any further action against the company and its owners”*.

The EU additionally notes that the deregistration of the company was done on 22 November 2022, whereas Belize has just confirmed in the ICCAT annual meeting that investigations were still ongoing (COC_306A/2022, dated 16 November 2022).

The EU also notes that this deregistration was based on the resignation of the registered agent and the failure of the said company to appoint a new resident agent, which seems to suggest that a company which would be under investigation of Belizean authorities for possible IUU fishing activities can actually put an end to these investigations by instructing its resident agent to resign and failing to appoint a new one.

The EU is therefore significantly concerned that deregistering the company has had practical effects which are opposite to the requirements of Recommendations 22-14, and which are:

“i. to investigate and to verify any allegations and/or reports concerning the engagement of any natural or legal persons subject to their jurisdiction who engaged or is engaging in, the activities described, inter alia, in paragraph 1 of the Recommendation by ICCAT Amending Recommendation 18-08 on Establishing a List of Vessels Presumed to Have Carried Out Illegal, Unreported and Unregulated Fishing Activities (Rec. 21-13);

ii. to investigate and to verify allegations and/or reports that natural or legal persons subject to their jurisdiction are responsible for, benefiting from or supporting the activities described in point i above (e.g. as operators, owners, including beneficial owners, logistics and service providers, including insurance providers and other financial services providers);

iii. to take appropriate, effective and deterrent action in response to any verified activities referred to in subparagraphs 1 i. and ii”.

Consistent with the line already expressed on the ineffectiveness of vessel deregistration as a way to deal with and sanction IUU fishing activities, the EU underlines that it does not view mere deregistration of a company as an effective sanction: if no fines are previously imposed and recovered, the deregistration means that the operator will keep all benefits stemming from previous illegal activities and is free to resume the same activities in another jurisdiction.

The EU would be grateful to receive clarifications from Belize on the above-mentioned issues.

10) Guyana

The EU reiterates the question raised in document COC_312/2023, as there was no reply from Guyana last year.

Extract from document COC_312/2023:

*“The examination of the EU import data demonstrates that from January 2022 to August 2022, there were three consignments of blue marlin (*Makaira nigricans*) exported from Guyana to the EU. The total quantity exported in these shipments amounts to 12,3 tons (processed weight). Another shipment was detected in June 2023 (export of 1500 kg of blue marlin steaks).*

The EU notes that Guyana declared last year that the fishery responsible for blue marlin catches has been stopped in August 2021 (ICCAT Document COC_309/2022), and that the identification of Guyana was lifted on the basis of this statement (ICCAT Document COC-308_APP_2A/2022).

The EU would consequently appreciate to receive detailed information on the exact dates of catch of the blue marlin that was exported to the EU from January to August 2022 and in the shipment detected in June 2023.

11) Panama

The EU takes note of the clarification provided by Panama under document COC_312/2023 that there was in 2020 a calculation mistake that resulted in the same catches being counted twice.

However, the EU reiterates the striking homogeneity of billfish catches made by Panama’s longliners fleet. The ICCAT Task I data as accessed by the EU on July 1, 2024, still only includes catches of sailfish (*Istiophorus albicans*), with 0 zero catch or discard of all other billfish species (nor of swordfish) from 2016 to 2022.

The EU consequently maintains its requests for clarifications from Panama on such catch composition, and on the mechanisms established to verify the information provided by the vessels.

12) Venezuela

Reference is made to the letter sent by Venezuela on 23 January 2023, which reports to the ICCAT Executive Secretariat that the vessel GONE FISHING has served the administrative penalties imposed by Venezuela and will therefore resume its fishing activities in the ICCAT area (available under COC 312/2023, Appendix 1).

However, the letter sent by Venezuela on 26 August 2022 (Appendix 2 of COC_312A/2022) states that the sanctions imposed by Venezuela provided for “*provided for a suspension of vessel’s fishing permit for one (1) year*”. Considering that the illegal fishing activities that triggered this sanction took place until April 2022 (same letter from Venezuela), the EU is unclear as to how Venezuela could already confirm in January 2023 “*due compliance by the vessel GONE FISHING with the administrative processes of penalty*” (COC_312/2023, Appendix 1). To the EU’s understanding, the one-year suspension should have been ending at the earliest in May 2023.

The EU would thus be grateful that Venezuela clarifies the exact dates of this one-year suspension. A clarification on the amount of the fine that was also imposed on the vessel (letter sent on 26 August 2022) and a confirmation that this fine has been paid would also be appreciated.

Yours sincerely,

Stijn BILLIET
Head of the EU Delegation to ICCAT

1. Response from Brazil to EJF on Potential illegal fishing in the area under the competence of ICCAT (documents A) and eight annexes to same

MINISTRY OF FISHERIES AND AQUACULTURE
NATIONAL SECRETARIAT FOR REGISTRATION, MONITORING AND RESEARCH OF FISHERIES AND
AQUACULTURE

OFÍCIO - MPA Nº 920/2024/SERMOP - MPA/MPA

Brasília/DF, October 10, 2024.

To ICCAT's Compliance Department
Mr. Alberto Parrilla
Head of Compliance Department
ICCAT Secretariat
Calle Corazón de María, 8-6º 28002 Madrid Spain
E-mail: info@iccat.int

Subject: Response to potential illegal fishing activity in the ICCAT area.

Mr. Alberto Parrilla,

1. This letter aims to respond to the Environmental Justice Foundation's (EJF) notification about possible illegal fishing activity by the Brazilian-flagged vessel RIO POTENGI in the ICCAT area during 2023.
2. Using the AIS satellite signal, the Environmental Justice Foundation (EJF) observed potential fishing cruises carried out by the vessel RIO POTENGI on August 9th, 2023, even though the vessel was not on the ICCAT positive list. This would disagree with paragraph 1 of ICCAT Recommendation 21-04, which establishes that the Contracting Parties must keep the ICCAT positive list updated for vessels over 20m authorized to fish for tuna and tuna-like fish in the area under the organization's jurisdiction. For management purposes, vessels that are not on the list are considered unauthorized to fish tuna and tuna-like fish in the ICCAT area.
3. Given the situation described above, the following paragraphs will address the reasons for the absence of the RIO POTENGI from the ICCAT positive list and its registration status within the framework of Brazil's fisheries management and maritime systems.
 - 3.1 The RIO POTENGI is a Brazilian-flagged vessel built in 2015, with an overall length (LOA) of 23.91 meters. It is registered by the Brazilian Navy under the number 021-101852-0 and with a fishing authorization (RN-0027890-9) targeting tuna and tuna-like fish using longline gear, valid until 2028. The vessel was listed on the ICCAT positive list from 2017 to 2022 and has always been submitted to the positive list under the Task 1 Fleet characteristics (T1FC). Currently, (2024) the vessel is on the ICCAT positive list (Annex I - 38172481) and authorized to fish ALB-S, SWO, and tropical tunas (TROP), with authorization valid until 2028 (Annex I - 38172481).
 - 3.2 In 2023, the vessel was in the process of renewing its fishing authorization valid for five years. Until the renewal process of the vessel authorization was completed (Annex II - 38172499), it was supported by the national normative - SAP/MAPA Ordinance No. 1.235, of August 30, 2022 (Annex III - 38300462), which extended authorizations submitted within the legal deadline until December 31st, 2023. This extension includes RIO POTENGI and other vessels.
 - 3.3 The authorization of the RIO POTENGI vessel was renewed by the Ministry of Fisheries and Aquaculture on November 23rd, 2023 (Annex IV - 38186762). However, due to an administrative error, Brazil did not update the RIO POTENGI vessel on the ICCAT Positive List in 2023.

- 3.4 It should be noted that for 2023, the vessel has complied with all its legal obligations with the Ministry of Fisheries, all its fishing cruises were tracked by the VMS System (Annex V, VI, VII - 38186789; 38186808; 38186830) and they have submitted all its catch reports through the official logbooks (Annex VIII - 38186840).
- 3.5 Brazil acknowledges the oversight in updating the vessel on the positive list and appreciates the opportunity to clarify the situation and to explain the internal measures taken to rectify any errors that may have affected the vessel RIO POTENGL. Furthermore, Brazil commits to fostering a transparent dialogue with the organization in any similar cases in the future.

Annex I – Current status of vessel in ICCAT
Annex II – Vessel renewal authorisation
Annex III - SAP/MAPA Ordinance No. 1.235
Annex IV - Vessel authorisation
Annex V - List of cruises
Annex VI – Cruises map 2023
Annex VII - KML file with cruise tracking
Annex VIII – Catch reports

Respectfully,

(Electronically signed)
LUIS GUSTAVO CARDOSO
Brazil's Head delegate
National Secretariat of Registration, Monitoring and
Research Ministry of Fisheries and Aquaculture

2a. Response from Chinese Taipei to European Union on possible non-compliance (document B above).

FISHERIES AGENCY
Ministry of Agriculture
8F, No. 100, Sec. 2, Heping W. Rd., Taipei, Chinese Taipei
TEL: 886-2-23835833 FAX: 886-2-23327395 <http://www.fa.gov.tw>

8 October 2024

No. 24/50

Mr. Camille Jean Pierre Manel
Executive Secretary
International Commission for the Conservation of Atlantic Tunas
C/ Corazón de María, 8-6th floor,
28002 Madrid, Spain

Subject: Responses from Chinese Taipei regarding the possible non-compliance raised by the EU

Dear Mr. Manel,

In response to the letter dated July 18, 2024 regarding submission from the EU regarding possible non-compliance with ICCAT conservation and management measures – Chinese Taipei, our report is as enclosure.

Your acknowledgement of the receipt of this letter will be appreciated.

Best regards,



Ding-Rong Lin
Head of Chinese Taipei Delegation to ICCAT Enclosure: as the attachment

2b. Responses from Chinese Taipei Regarding the possible Non-Compliance raised by the EU

1. Update on the investigations carried out on F/V MARIO 11 (Document PWG_405/2023, Attachment 1)

It is confirmed that SOUTHERN WOLF HOLDINGS LIMITED remitted the money to a bank account in Chinese Taipei for the acquisition of F/V MARIO 11. The account holder is OCEAN EMPIRE TRADING INC. Relevant investigations such as the ownership of OCEAN EMPIRE TRADING INC. are still ongoing, so as to look into this case in a comprehensive manner. Chinese Taipei will update the result once the investigations are concluded.

2. Update on whether the fine imposed on the owner of F/V SAGE has been paid

YU CHEN OCEANIC CO. LTD filed an administrative litigation against the disposition imposed by the Fisheries Agency of Chinese Taipei (TFA). While the legal proceedings are underway, the TFA, in accordance with the domestic legislation, has applied for compulsory enforcement to collect the fine. A portion of the fine has been paid, and the processing of collecting the fine is still ongoing.

3. Response from The Gambia to European Union on possible non-compliance (document B above) and eight annexes to same

Issues about catch certificates and bill of lading

Since 2022, the EU has been seeking information from The Gambia on the origin of the yellowfin tuna, bigeye tuna, and swordfish that was fraudulently exported to the EU in 2020 and 2021 (COC_312A/2022, Appendix 5). Until now, this information has not been provided by The Gambia, which, despite several reminders, has yet to clarify the relevance of the documents that it shared with the EU in November 2023 (the main company involved in the illegal exports to the EU is absent from these documents, and there are major inconsistencies in terms of dates, route, or species).

The EU consequently reiterates, for the third year in a row, its request to receive from The Gambia comprehensive information on the origin of the fish that was fraudulently exported to the EU.

The Gambia has made extensive efforts to secure the bill of lading associated with the illegal fish consignment, given the unavailability of matching catch certificates. From the analysis of the documents submitted from the affected companies, one of the bill of lading (Ref. 704682) on yellowfin tuna confirm that the origin of one of the consignments is from Chile (see annexed the bill of lading).

As requested, the Main Company associated with the Bill of lading for the consignment from Chile is International Pelicans Seafood Company Limited and the rest of the bill of ladings are associated with A-plus Seafood Company.

The inconsistency in reference to species relevant to the matter and those not relevant to the matter, was due to a requested by EU through Roberto in an email dated 22 May 2023.

The Bill of lading MEDUTO735442 with shipped onboard date 09-01-2023 is irrelevant to this issue and should be disregarded. It was only annexed upon a request from EU for Gambia to submit all the catch certificates from the companies concern for 2020 and 2021 (*reference email from Roberto dated*).

Issues about KIKI and LUCAS

The EU also notes that although The Gambia reported that the vessels LUCAS and KIKI (IUU-listed vessels, former Senegalese-flagged vessels MAXIMUS and LISBOA1) were deregistered on 10 November 2023, the IMO Global Integrated Shipping Information System (GISIS) still refers to The Gambia as Flag State of the two vessels (verification performed on 1 July 2024). The EU requests that The Gambia proceed to provide the necessary clarifications.

The Gambia Informed the EU that the two Vessels KIKI and Lucas have been deleted and provided the EU with Deletion certificates. However, the notification at the time was not extended by Gambia Maritime Administration (GMA) to IMO for final deletion.

We would like to underscore that as previously stated the Ministry of Fisheries is not in charge of registration and deletion of Fishing Vessels as it may be the case in other countries. Notwithstanding, the gab created by this institutional arrangement is been addressed by an Memorandum of Understanding (MoU) between the Department of Fisheries and Gambia Maritime Administration (GMA) to ease coordination.

Following your recent correspondence we have engaged the GMA seeking for clarification on the matter and they have informed us that they are yet to get any feedback from IMO regarding the final deletion of Kiki and Lucas from the IMO GISIS account (find annexed the correspondence from GMA to IMO relating to the information on deletion).

As per the information from GMA, the deletions by IMO are done annually by the 30 June as IMO annual frag state tonnage assessment exercise (*see annexed letter from GMA*).

Issue about LUCCIA (former Senegalese-flagged tuna longliner DIAMALAYE 1909)

Finally, the EU notes that The Gambia did not reply to questions raised in document COC_312/2023 on the vessel LUCCIA (IMO 8017762, former Senegalese-flagged tuna longliner DIAMALAYE 1909). Considering that the vessel was built as a tuna longliner, that it is currently not on the ICCAT record of authorized vessels, and that its last known owner is the Senegalese company that had three vessels placed on the IUU list in 2020 and 2022, the EU requests clarifications on the activities of the vessel since it was registered under the Gambian flag and on the control measures that The Gambia has established to ensure that the vessel cannot engage in unauthorized tuna fishing or fishing-related activities.

The vessel (LUCCIA) was registered and flagged by GMA but was never license by Fisheries Department to fish in our waters as such it has been deleted. It was deleted due to the history of the company (*see annexed the deletion certificate and notification*).

Important Notification

I wish to bring the followings to the attention of ICCAT and UE as notification and for consideration.

1. Unstable Administrative head at the Ministry:- It is worth mentioning that from January 2022 to November 2023, the Ministry of Fisheries, Water Resources and National Assembly Matters witnessed the change of three Permanent Secretaries (Mr. Omar S Gibba, Madam Rohiyatou Kah and Mr Alagie Nyagado). I am the fourth Permanent Secretary since January 2020. These frequent changes obstructs and delays administrative procedures and timely respond to issues. In line with the above, The Government of The Gambia extends its gratitude for your understanding regarding the delayed responses attributed to administrative transitions within the Ministry of Fisheries.
2. Mandate and Administrative Arrangement between Department of Fisheries (DoF) and Gambia Maritime Administration (GMA):- In the Gambia, the Gambia Maritime Administration GMA do not fall under the administration of the Ministry of Fisheries as it applies to most of the Countries but rather under the Ministry of Works, Transport and Infrastructure. This institutional arrangement significantly affects coordination and timely response to issues. However this bottle-neg is addressed by the MoU between the two institutions.

With regards to mandate, GMA is mandated to register and/or flag all vessels for seaworthiness in the Gambia whether related to fishing and fishing related activities or other activities such as transportation, tourism etc. while DoF only license registered vessels for Fishing and Fishing related activities. Before the MoU, most of these registrations are done at the level of GMA independently, however this is also addressed by the MoU.

The Gambia wishes to register it's commitment and intention to address the aforementioned issues bilaterally with the European Union. We believe this will address these issues once and for all and enables to move on on our collective fight against Illegal, Unreported and Unregulated fishing in our waters. Gambia Knows for certain it is capable of handling these IUU issues as a state and in collaboration with all the stakeholders.

We look forward to your kind and usual consideration and understanding. Thanks

Buba Sanyang
Permanent Secretary



4a. Response from Guyana to European Union on possible non-compliance (document B above) and two annexes to same.

Ministry of Agriculture
Fisheries Department Regent & Vlissengen Roads Bourda, Georgetown

10 October 2024

Mr. Camille Jean Pierre Manel Executive Secretary International Commission
for the Conservation of Atlantic Tunas

Dear Executive Secretary Manel,

RE: Guyana's compliance with ICCAT conservation and management measures

Thank you for your correspondence dated July 18, 2024, regarding the European Union's submission on possible non-compliance with ICCAT Conservation and Management Measures by Guyana.

We wish to reaffirm that the fishery responsible for highly migratory species, including blue marlin (*Makaira nigricans*), remains closed. This closure was reported to ICCAT in our communications, as acknowledged in COC_309/2022, and continues to be enforced. All measures outlined during the Joint IUU Fishing and Bycatch Consultation with Guyana following its identification in the 2021 Report to Congress also remain fully in place.

After conducting thorough local investigations, we can confirm that the company responsible for the reported blue marlin exports was inspected. A full assessment of their frozen stock of blue marlin was conducted, and the stock was quantified. It was confirmed that the fish in question were harvested before the suspension of the fishery. Furthermore, all these exports were documented in the corresponding catch certificates.

In response to the recent detection of exports in June 2023, the Fisheries Department has taken swift action and issued a formal directive to the company, instructing them to cease any further shipments of blue marlin.

These actions are part of Guyana's ongoing efforts, to prevent IUU (Illegal, Unreported, and Unregulated) fishing and ensure full compliance with ICCAT regulations. We remain committed to reducing the occurrence of IUU fishing and maintaining sustainable fishing practices.

We welcome continued dialogue and are open to additional discussions and measures that can strengthen our compliance efforts.

Thank you for your attention to this matter.

(signed and stamped)

Mr. Denzil Roberts, Chief Fisheries Officer

Tel: (592) 226-4398, 225-9551, 225-9552
fisheriesguyana@tigmil.com

4b. Response from Guyana to European Union on possible non-compliance (document B above) and two annexes to same.

Summary Report on Guyana's Compliance with ICCAT Conservation Measures

Subject: Review of Guyana's Compliance with ICCAT Measures on Highly Migratory Species

Date: October 2024

Prepared by: Fisheries Department, Ministry of Agriculture, Guyana

1. Introduction

This report provides an update on Guyana's compliance with the conservation and management measures of the International Commission for the Conservation of Atlantic Tunas (ICCAT) related to highly migratory species, specifically blue marlin (*Makaira nigricans*). It addresses concerns raised by the European Union (EU) in its submission regarding potential non-compliance and highlights Guyana's actions to ensure adherence to ICCAT recommendations (S24-07491)

2. EU Submission and Concerns

In July 2024, the ICCAT Secretariat received a submission from the European Union (EU) regarding possible non-compliance with ICCAT Conservation Measures by Guyana. The EU expressed concerns over the export of blue marlin from Guyana between January 2022 and August 2022 (12.3 tons) and a shipment detected in June 2023 (1.5 tons). The EU highlighted that Guyana had previously reported the suspension of the blue marlin fishery in August 2021, as noted in the ICCAT Compliance Report COC_309/2022.

The EU requested clarification on the catch dates and compliance with the suspension of the fishery, seeking detailed information prior to the ICCAT Compliance Committee meeting in November 2024.

3. Current Compliance Measures:

Guyana reiterates its commitment to ICCAT measures and reports the following:

- **Fishery Closure:** The fishery responsible for the harvesting of highly migratory species, including blue marlin, remains closed as previously reported to ICCAT in 2022 (COC_309/2022). This closure is still in effect, and no new harvests of blue marlin have occurred since the suspension.
- **Joint IUU Fishing and By-Catch Consultation:** Measures outlined during the Joint IUU Fishing and By-Catch Consultation between Guyana and international stakeholders, following Guyana's identification in the 2021 Report to Congress, remain in force. These measures have been instrumental in curbing illegal, unreported, and unregulated (IUU) fishing activities.

4. Investigations and Actions Taken

In response to the EU's concerns, the Fisheries Department undertook a detailed investigation into the shipments identified in 2022 and 2023:

- **Local Inspection:** The company responsible for the exports was inspected by the Fisheries Department. An assessment of their frozen stock of blue marlin was conducted, and the fish were confirmed to have been harvested before the suspension of the fishery in August 2021. All shipments were recorded and accounted for in the official catch certificates.
- **Cease Shipment Directive:** The Fisheries Department issued a formal letter to the company, instructing them to immediately cease all further shipments blue marlin. This action ensures that no new exports occur while the fishery remains closed.

5. Guyana's Ongoing Commitment

The Fisheries Department continues to take proactive steps to ensure compliance with ICCAT regulations and to prevent the recurrence of IUU fishing. Actions include:

- Enhanced monitoring of fisheries operations for local and foreign vessels.
- Interdiction of local and foreign fishing vessels operating illegally or having restricted catch onboard.
- Regular inspection of companies involved in fish exports.
- Strengthened documentation processes, including catch certification and actions to transition to the digital catch certificate reporting platform.

Guyana remains committed to working with international bodies, including the EU and ICCAT, to improve compliance measures and maintain the sustainability of marine resources.

6. Conclusion

The Fisheries Department have taken the necessary steps to address the EU's concerns and remain in full compliance with ICCAT's conservation and management measures as a Cooperating Non-Contracting Party, Entity or Fishing Entity in ICCAT (Rec. 21-24). Investigations confirmed that no new blue marlin catches occurred after the closure of the fishery, and measures are in place to prevent further exports. Guyana remains open to continued dialogue and actions to strengthen its commitment to sustainable fishing practices.

5. Response from China to European Union on possible non-compliance (document B above)

To: Mr. Camille Jean Pierre Manel
Executive Secretary
International Commission for the Conservation of Atlantic Tunas (ICCAT)

Subject: Reply letter from China about S24-07488

Dear Executive Secretary,

Thank you for your information in your letter dated July 18, 2024. (Ref. S24-07488).

China resolutely supports and actively joins in the efforts made by the international community to curb IUU fishing. China strictly regulates distant-water fishing, shows “zero tolerance” for illegal fishing, and severely punishes via administrative means any distant-water fishing vessel and company that has engaged in illegal fishing. China carries out full-scale investigations on any report against suspicious activities conducted by Chinese distant-water fishing vessels. Should a violation be confirmed, the vessel responsible and the vessel owner(s) will be severely punished. At the same time, China’s fishery authority continuously strengthens cooperation with other departments to jointly combat against illegal fishing.

Regarding the concern from EU, we would like to confirm that China fully comply with *Recommendation by ICCAT to replace Recommendation 06-14 to promote compliance by nationals of Contracting parties, cooperating non-contracting parties, entities or fishing entities with ICCAT conservation and management measures (Rec 22-14)* as well as all other recommendations under ICCAT.

On a case-by-case basis, we worked with China Coast Guard and other agencies to conduct investigation with our best efforts on the Chinese national relating to IUU Vessels ISRAR2/ISRAR3. We would like to reiterate, as we did during the annual meeting last year, after further investigation we found that this Chinese national was an ordinary ship surveyor. Based on his financial & family status and his daily routine of life, no evidence shows that he has connection with any overseas corporation. His personal information might be stolen and falsely used.

Regarding to the vessel ISRAR 1 mentioned by other RFMO, we have not received any further information on the vessel and we will be interested to discuss this issue within the corresponding RFMO.

We would like to reiterate our commitment to continue to fully and effectively implement the convention, recommendations and all regulations of ICCAT for the purpose of long term conservation and sustainable utilization of fishery resource in ICCAT convention area.

Please forward this letter to any related CPCs who may be interested in this matter.

Best regards.

Mr. SUN Haiwen
Deputy Director General
Bureau of Fisheries, Ministry of Agriculture and Rural Affairs,
People’s Republic of China

6. Response from Namibia to European Union on possible non-compliance (document B above) and four annexes to same

**REPUBLIC OF NAMIBIA
MINISTRY OF FISHERIES AND MARINE RESOURCES**

Telephone: +264 61 205 3007
Enquiries: Desmond.Bester@mfmr.gov.na
Reference: 7/6/15

Private Bag 13355
Brendan Simbwaye Square, Block C
Cnr. Dr. Kenneth Kaunda & Goethe Street
Windhoek, Namibia

Mr. Camille Jean Pierre Manuel
ICCAT Executive Secretary
Corazon de Maria 8
28002 Madrid, Madrid

Dear Camille Jean Pierre Manel,

10 October 2024

SUBJECT: SUBMISSION FROM THE EU REGARDING POSSIBLE NON- COMPLIANCE WITH ICCAT CONSERVATION AND MANAGEMENT MEASURES - NAMIBIA

We refer to the above matter as per EU letter dated 18 July 2024.

Kindly note that the vessel Halifax did not engage in any fishing activities since it was delisted in 2023. Similarly, the vessel never left the Port of Luderitz since. Attached please find confirmation letter from the Namibian Port Authority (Namport) on the movement of the vessel.

The vessel owner informed this Ministry that they have suffered severe financial losses while the vessel was listed on the ICCAT IUU listing which contributed to the ceased fishing activities. It was further well-versed that, in preparation to resume fishing operations the vessel is undergoing surveys and prerequisite product health and safety compliance requirements to be able to trade with the EU.

Namibia is pleased to inform that the vessel Halifax was listed on the ICCAT Record of Vessels since 19th May 2024 (*please see attached*).

Furthermore, Namibia requested the ICCAT Secretariat to change the Vessel Type (according to FAO Vessel Types, i.e. ISSCFV) to (LP) Pole and liners for both vessels the F/V Halifax and F/V Bluefin on 27th September 2024. We can confirm that these rectifications were made on the ICCAT website.

Following the EU letter of 18 July 2024, Namibia submitted communications to the IMO Global Integrated Shipping Information System (GISIS) and the Senegalese Authorities to rectify the flag status of the vessel Halifax on the IMO (GISIS) vessel list (*please see attached*).

The certificate of Namibia Registry confirming the Namibian ownership of Halifax issued on 10 September 2021 by the Ministry of Works and Transport, Directorate Maritime Affairs of the Republic of Namibia. (*please see attached*).

Please do not hesitate to reach out to us should you require additional information or documentation to support this confirmation.

Yours sincerely,

Mr. Ueritjiua Kauaria
Deputy Executive Director

All official correspondence must be addressed to the Executive Director.

7. Response from Panama to European Union on possible non-compliance (document B above)

General Administration Office

Panama, 10 October 2024
AG-901-2024

Mr Camille Jean Pierre Manel
ICCAT Executive Secretary

Dear Camille Jean Pierre Manel:

Panama has received your letter ICCAT S24-07493 dated 18 July 2024, which informs of a communication from the European Union requesting clarification on a possible non-compliance with ICCAT conservation and management measures. Therefore, following the mechanism established in Rec. 08-09, we share with you clarifications on the issues raised in your letter and the actions that Panama has been implementing to improve its data collection and reporting system for longline vessels.

In this regard, we express the following:

The EU reiterates the surprising homogeneity of billfish catches made by the Panamanian longline fleet.

Response 1: Regarding the alleged homogeneity of billfish catches, we would like to notify that, of these species, **our longline vessels only retain and land sailfish (*Istiophorus albicans*)**, which is reported in Task 1 data. The rest of the billfish species are discarded.

ICCAT Task 1 data accessed by the EU on 1 July 2024, still only includes catches of sailfish (*Istiophorus albicans*), with zero catches or discards of all other billfish species (nor of swordfish) from 2016 to 2022.

Response 2: For longline vessels from 2016 to 2022, only retained organisms were considered in the data record. In this regard, and aware of the importance of discard and release data for species stock assessments, we have undertaken actions that will allow us to estimate unutilized catch starting in 2025. Among them:

- The obligation to report, in the logbook, in addition to retained catches, catches of released or discarded species.
- Homologation of longline fishing logbooks and their mandatory use, starting April 2024.

On the mechanisms established to verify the information provided by the vessels.

Response 3: Prior to 2023, the Fisheries Control and Monitoring Center (*Centro de Control y Seguimiento Pesquero*, CCSP) of the Aquatic Resources Authority of Panama (ARAP) verified catches through the review of documents, such as fishing logs and landing reports at port, which detailed the quantities and species landed. These documents had to be stamped and signed by the competent authority of the port State.

As of 2023, the CCSP is carrying out a new validation procedure in accordance with Article 6 of Resolution ADM/ARAP No. 048 of 30 August 2023. In this framework, prior to landing, the following documents must be submitted: Port Entry Notification, permit or authorization to fish in third countries (if applicable), fishing departure clearance, fishing logbook and stowage plan (applicable only to vessels with more than one hold or tank).

After landing, in coordination with the Surveillance and Control Department, the sales note or commercial invoice, the stowage plan after landing (when it is not total), and an official report issued by the competent authority validating the quantities and species of the landed product, duly signed and sealed, are reviewed. This revision of documentation is complemented with the verification of the vessel's course positions, through the satellite vessel monitoring system (VMS), corresponding to the trip carried out.

With the assurances of my high esteem and distinguished consideration.

Sincerely,


EDUARDO CARRASQUILLA D.

