

Lack of compliance with management rules and traceability shortcomings in the 2010 industrial bluefin tuna fishery in the Mediterranean Sea

Summary prepared by WWF and Greenpeace based on official information made available by the International Commission for the Conservation of Atlantic Tunas (ICCAT) to its Contracting Parties

November 2010

Overview

On 18th October 2010 the ICCAT Secretariat submitted a circular to all ICCAT Contracting Parties providing them access to the inspection reports pertaining to the ICCAT Scheme of Joint International Inspection for the 2010 eastern Atlantic bluefin tuna fishing season. Additionally, access has been provided to all the official reports pertaining to the ICCAT Regional Observer Scheme. These reports are provided in a standard format by ICCAT observers on board industrial purse seine vessels and farms in the Mediterranean, and describe in detail all the fishing and farming activities having taken place during the 2010 bluefin tuna fishing season. In 2010 the Regional Observer Scheme was meant to provide 100% observer coverage both on purse seine vessels and at the fish farms.

Taken together, these two unique sources of information provide a formidable account of the total failure by ICCAT parties, including the EU, to manage the fishery – and they portray a fishing and farming industry with huge control problems, that continues to engage in rife violation of reporting rules. This compelling data demonstrates that the implementation of a catch traceability system (the ICCAT Catch Document Scheme) adopted in 2007 has failed to ensure the traceability of catches. In short, the system continues to be fully broken.

These revelations come after several years of increased controls and a huge amount of public money being poured into this fishery. It further supports the thesis of experts and NGOs that the whole industrial bluefin tuna fishing and farming industry operating in the Mediterranean Sea, based on purse seine vessels delivering live fish to fattening farms, is structurally out of control and must be immediately suspended.

What ICCAT data is uncovering

Annex 1 provides a summary per country and in tabular presentation of the information contained in the inspection reports, including the nature of infractions formally reported. This information adds to that contained in the 120 observer reports relative to farms and fishing vessels, and points towards a wide array of irregular situations. Below we provide a non-exhaustive generic description of some of these situations, and in the following section we describe a few concrete cases in some detail, as examples.

Additionally, the reports analysed clearly imply that the Mediterranean bluefin tuna purse seine fishery still estimates and reports its catches without any effective independent verification by management authorities. Out of 23 observers placed in Spanish and French purse seiners, 15 encountered difficulties to estimate the amount of tuna in cages, in most cases acknowledging this was “simply impossible” and they had been left with having to accept the estimation by the vessel skipper and/or the tug

divers. Out of the eight who did not report such problems, three were on board vessels that did not make any catch.

ICCAT data provide solid evidence of:

- Strong divergences (up to 2.5-fold) between catch data officially reported by skippers of fishing vessels in transfer declarations and data reported by skippers of tug boats to inspectors.
- Strong divergences between catch data officially reported by skippers of fishing vessels in transfer declarations and catch data reported in the correspondent Bluefin Tuna Catch Documents (BCDs).
- Mismatch between number and weight of catch of fishing hauls described by observers and the data reported through BCDs.
- Transfer at sea of tuna cages between tugboats without the required authorisations; deliveries of the fish in the farms by tugboats different from those reported as having been for the transferral of fish.
- Transfers that have not been recorded on video as is mandatory.
- Tugboats operating with the required Vessel Monitoring System (VMS) switched off or without any VMS system whatsoever.
- Logbooks missing key information on fishing and transfer operations.
- BCDs missing key information on fishing and transfer operations.
- Different versions of a same BCD.
- Illegal transshipments at sea.
- Tugboats lacking original BCDs on board from the catching vessels.
- Tugboats recording incomplete information on transfer declarations.
- Physical obstruction to accredited inspectors in purse seiners.
- Purse seiners transferring fish without the required transfer authorisation.
- Tugboats with transfer declarations not validated by observers.
- Purse seiners using incomplete BCDs.
- Tugboats towing single cages resulting from multiple transfers (from up to 8 different purse seine vessels or even more) and lacking the required catch and transfer data.

It is particularly relevant that tugboats, which handle almost the totality of purse seine catches in the region, continue to be completely out of control – thus providing a perfect, yet unaddressed, cover for illegal fishing operations.

Selected case studies

The following two case studies are strictly based on factual information found in the ICCAT official documentation explained above, in some cases supplemented with information from the official ICCAT Bluefin Tuna Catch Document (BCD) database, and have been selected largely at random. They intend to be only an example of the overall situation of the fishery in 2010 described by the documents.

- Case Study 1. Turkey

According to the report by ICCAT Observer No 115 referring to the activities of the Turkish purse seiner Trabzon Su Urunleri-1 (AT000TUR00115), on 9th June 2010 this

vessel transferred 120 fish for a total weight of 18,000 kg to the towing vessel Basaranlar (AT000TUR00488). This amount of fish according to the observer had been fished by the purse seiner the same day of the transfer, and the vessel skipper recorded it as 105 fish weighing 11,550 kg. This catch was assigned the BCD number TR-10-000184. However, according to the ICCAT BCD database, BCD TR-10-000184 corresponds to 314 fish weighing 10,950 kg caught by this same vessel 5 days later, on 14/06/2010. In fact, the observer report records a further fishing operation on 14/06/2010 yielding an estimated catch of 250 fish weighing 7,500 kg (which were recorded by the skipper as 314 fish weighing 11,000 kg), which were also reported to have been transferred to Basaranlar. Strangely enough, the observer reports the same transfer declaration number for the transfers of the days 09/06 and 14/06 (ITD No BAS-2010-15), and even the same BCD number for the transferred catch (TR-10-000184).

The observer also reports that the skipper of the purse seiner incorrectly reported that the catch pertaining to the 09/06/2010 fishing operation had been transferred to the towing vessel Yasar Reis 3 instead of to the Basaranlar. Furthermore, the observer reports that he was told at a later stage that the cage ended up being towed by a third vessel called Oztoprak. Furthermore, ICCAT Inspection Report 0051/10 records that on date 12/06/2010 the purse seiner/towing vessel Yasar Reis 3 was towing one empty cage.

According to the report by ICCAT Observer 002 referring to the activities of the tuna farm BASARANLAR ORKINOS BESICILIGI PROJESI (Farm ICCAT Ref No AT 001 TUR 00006), the fish covered by BCD TR-10-000184 were delivered to the farm on 24/06/2010 by the purse seine/towing vessel Ismail Serter (AT000TUR00502). According to the ICCAT Inspection Report 060/10 on 14/06/2010 the Ismail Serter was not towing any cage.

The above evidence strongly points to the catch of 18,000 kg by the Trabzon Su Urunleri-1 recorded by the observer on 09/06/2010 having gone “unnoticed” by the ICCAT paperwork.

Additionally, ICCAT Inspection Report 007/2010 made on Trabzon Su Urunleri-1 records “serious violations” of ICCAT rules, including unfilled logbooks and absence of transfer authorisations, among others.

- **Case Study 2. Fishing by Spanish, French purse seiners¹ out of sight**

Traceability shortcomings in bluefin tuna transport to the Spanish farm Balfego²

a) Delivery of 165 tonnes of bluefin tuna by the Spanish tugboat *Isleta Tercera*

On 30th May 2010, the observer on board the French vessel *Janvier Giordano* reported on a fishing operation which resulted in an estimated catch of 25,000 kg composed of 350 bluefin tuna individuals. That same day the observer recorded the transfer of that catch, now estimated by the vessel's own crew to amount to 70,000 kg and to be composed of 760 fish. The catch was transferred to a cage numbered #2, towed by the Spanish tugboat *Vinaches*.

Also on 30th May 2010, the Spanish vessel *La Frau Dos* was reported to catch 35,000kg of bluefin tuna composed of 400 fish. The catch was later transferred to the

1 Spain and France together hold 33.6% of the eastern Atlantic bluefin tuna quota.

2 Four Spanish purse seiners and seven French purse seiners fish together under a Joint Fishing Operation to supply this farm with bluefin tuna.

same cage and tugboat, the *Vinaches*, as *Janvier Giordano*'s. And yet again it was estimated to be substantially above the initial quantity: 55,000 kg and 787 bluefin tunas.

As pointed out by *Janvier Giordano*'s observer, the cage was not empty when they transferred the fish³: on 26 May 2010, the Spanish fishing vessel *Tio Gel Segon* had caught 46,650 kg (415 tunas) which were initially transferred to another Spanish tugboat, *El Coyote*, and were later transferred to the *Vinaches* on 27 May 2010.

To add to these already obvious traceability problems, cage numbered #2 towed by the *Vinaches* would never make it to the Spanish Group Balfego tuna farm in NE Spain. On 18 June 2010 its cargo was reported by an observer to have arrived at the Balfego farm, towed by a third Spanish tugboat, the *Isleta Tercera*.

In summary, the tuna which arrived in one single cage moored by the *Isleta Tercera* at the Balfego farm on 18 June 2010, contained tuna from three different vessels (the Spanish *La Frau Dos* and *Tio Gel Second* and the French *Janvier Giordano*) and which had been previously transferred to two different tugboats, the Spanish *Vinaches* and *El Coyote*.

When the *Vinaches* was inspected on 10 June 2010, the inspector found that the ICCAT Transfer Declarations were incomplete and that the Transfer Declaration from *El Coyote* to the *Vinaches* was not available. None of those tugboats were carrying observers, since observers are required on board all purse seiners, but not on tugboats.

To further complicate things, the observer on board the *Janvier Giordano*, reports that “all the cages attached to the towing vessels had tunas inside, even before the transfer. I asked why and they told me that was because of the attraction of the tunas.” The *Janvier Giordano* is known to have conducted transfers at least to cages #2 of the Spanish tug *Vinaches* and #3 of the Spanish tug *Sol Tercer*. To our knowledge the observer was not informed how much tuna was inside those cages “to attract other tuna”, but the situation seems irregular to say the least.

b) Delivery of 151 tonnes of bluefin tuna by the Spanish tug *Nou Jovianet*

The one described above is not an isolated case. Rather the contrary, this tug-swapping seems to have been the rule in this Spain-France Joint Fishing Operation: four independent catches made by the Spanish *La Frau Dos* and *Leonardo Brull Segon* and the French *Gerald Jean IV* and *Gerard Luc III* were all transferred to *El Coyote* on 1 June 2010. On 22 June 2010, when these catches arrived at the Balfego farm, they did so on board a different tugboat, the *Nou Jovianet*. There is no record of the *Nou Jovianet* having been inspected.

c) Delivery of 107 tonnes of bluefin tuna by the Spanish tug *El Coyote* and 171 tonnes by the *Tomas y Carmen*

The Spanish tugboat *El Coyote* did bring tuna to the Balfego tuna farm, but it did so with a different cargo from the one described above. The catches made by the Spanish *Gepus* on 7 June 2010 and the *Leonard Brull Segon* on 8 June 2010 were transferred to the tug *Isleta Tercera* and were later transferred to *El Coyote*, which arrived to the Balfego farm on 19 June 2010. When *El Coyote* was inspected on 14 June 2010, the inspector found the ICCAT Transfer Declarations to be incomplete, in contravention of

3 “Sometimes the same cage received the catch of two, or more, vessels.”

article 76 of ICCAT Recommendation 08-05. The observer could not verify the authorisation of the transfer from the *Isleta Tercera* to *El Coyote*.

Similarly, catches made by the Spanish *La Frau Dos* and *Tio Gel Segon* had been transferred to the tugboat *El Coyote* on 24 May 2010 and then later to another Spanish tug boat, the *Tomas y Carmen*. An inspection on 16 June 2010 the Spanish *Tomas y Carmen* found it to be towing just one cage, and carrying on board eight ICCAT Transfer Declarations, corresponding to eight different catches, all mixed in just one cage, including those of the *La Frau Dos* and the *Tio Gel* transferred to *El Coyote* on 24 May 2010.

To still further compound the lack of controls on the activity of tugboats, inspectors found that the *Tomas y Carmen* had passed its tuna cages to a support vessel, the Spanish *Juan Paredes*, while it left bound to the port of Denia for refuelling. The *Juan Paredes* logbook did not report on the transfer from the *Tomas y Carmen*, and the latter had neither reported on the transfers to the *Juan Paredes*.

Traceability shortcomings in bluefin tuna transport to the Spanish *Caladeros del Mediterraneo* tuna farm⁴

a) Delivery of 50 tonnes of bluefin tuna by the tug *Boamax*

Two independent catches made by the Spanish *Nuevo Elorz* and the French *Janvier Louis Raphael* were transferred to the Panamanian tugboat *Antoni X* on 5 June 2010. On 28 June 2010, when these catches arrived at the *Caladeros del Mediterraneo* farm, they did so on board a different tugboat, the *Boamax*. There is no record of the *Boamax* having been inspected. The *Antoni X* was inspected and on 5 June 2010 inspectors report that the Bluefin Catch Documents corresponding to the catches of the *Nuevo Elorz* and *Nuevo Panchilleta* were not on board at the time of inspection, as is mandatory.

b) Delivery of 151 tonnes of bluefin tuna by the Spanish tug *Antoni X*

Three independent catches made by the Spanish *Nuevo Elorz* and *Nuevo Panchilleta* were all transferred to the Spanish tugboat *Pepa Alonso* on May 2010. On 22 June 2010, when these catches arrived to the *Caladeros del Mediterraneo* farm, they did so on board a different tugboat, the Panamanian *Antoni X*. The tug was again inspected on 13 June 2010, and it was found that the ICCAT Transfer Declaration of the *Janvier Louis Raphael* lacked date, location, weight and number of fish.

Observers completely unable to estimate catches, let alone verify them

The observer system currently in place is completely flawed and there is absolutely no way to independently estimate the weight and numbers of bluefin tuna caught by purse seiners and transferred into tuna cages. Observer reports prove without doubt that again in 2010 it has been entirely up to the industry itself to estimate catch numbers, which observers simply cannot verify. In other fisheries, an observer on board a fishing vessel is able to verify the catch since the fish is hauled to the ship deck. In the bluefin tuna purse seine fishery, the fish is always underwater and observers remain on board the vessel so it is almost impossible to independently estimate fish numbers. This is further complicated by the operations described above in which the catch from different

4 Two Spanish and two French purse seiners fish together under a Joint Fishing Operation to supply this farm with bluefin tuna.

vessels is mixed in one cage and transfer operations take place among several tugboats in the absence of observers.

Out of 23 observers placed on board Spanish and French purse seiners, 15 encountered difficulties in estimating the amount of tuna in the cages, in most cases acknowledging this was “simply impossible” – and they were left with having to accept the estimation by the vessel skipper and/or the tug divers. Out of the eight who did not report such problems, three were on board vessels that did not make any catch.

Additionally, huge differences have appeared between the estimations made by the ship skippers at the time of catch and at the time of transfer, with no means for any independent source to check the accuracy of any of these. Some figures are hardly credible given that bluefin tuna skippers are highly specialised and experienced. An initial estimation of 132 tonnes and 1,850 tunas made by the Spanish *Nuevo Panchilleta* at the time of catch became 465 tonnes and 6,495 tunas at the time of transfer. A catch of 115,000 tonnes and 1,350 tunas by the French *Janvier Giordano* became 211 tonnes and 3,210 tunas. In 10 out of 20 cases, the estimation seems to be perfectly accurate. Yet again the problem persists that there is absolutely no independent verification of these figures and that once it enters the fattening process, there is simply no way to ensure that illegal, unregulated and unreported (IUU) catches will not be laundered. The table below shows the discrepancies.

Vessel name	Estimation at catch		Estimation at transfer		Difference	
	Weight	Number	Weight	Number	Weight	Number
Nuevo Panchilleta	132,455	1,850	465,000	6,495	251.06%	251.08%
Nuevo Elorz	109,000	1,560	122,300	1,875	12.20%	20.19%
Gepus	94,000	2,220	114,968	2,367	22.31%	6.62%
La Frau Dos	215,000	2,350	235,000	2,711	9.30%	15.36%
Leonardo Brull Segon	22,500	400	36,650	734	62.89%	83.50%
Tio Gel Segon	187,050	3,263	187,050	3,263	0.00%	0.00%
Pierre Joseph Salvador	188,300	1,942	187,900	1,930	-0.21%	-0.62%
St Sophie François II	64,887	1,091	64,887	1,092	0.00%	0.09%
St Sophie François III	129,000	2,170	129,000	2,170	0.00%	0.00%
Chrisderic II	31,480	221	31,480	221	0.00%	0.00%
Ville D'Agde IV	31,480	221	31,480	221	0.00%	0.00%
Gerald Jean III	60,000	410	60,000	410	0.00%	0.00%
Gerard Luc III	32,850	362	32,580	362	-0.82%	0.00%
Gerard Luc IV	4,000	50	7,008	57	75.20%	14.00%
Gerald Jean IV	43,500	520	55,200	710	26.90%	36.54%
Jean Marie Christian III	30,000	250	50,000	400	66.67%	60.00%
Jean Marie Christian VI	295,750	2,245	295,750	2,245	0.00%	0.00%
Janvier Louis Raphael	74,188	1,275	55,188	1,275	-25.61%	0.00%
Janvier Giordano	115,000	1,350	211,000	3,210	83.48%	137.78%
Anne Antoine II	20,000	150	20,000	300	0.00%	100.00%
TOTAL	1880440	23900	2392441	32048	27.23%	34.09%

* The estimation at transfer for the Jean Marie Christian VI and the estimation of the number of fish for the Janvier Giordano were not available, so we have kept the original estimatio at catch.

ANNEX 1

Summary of all ICCAT Inspection Reports
made available on 8th November 2010

	Inspection report	Inspection date	Vessel name	Vessel type	Operation	Infraction	Comments
FRANCE	AR/JM/JL/06	30 May 2010	Janvier Giordano/ST 819571	Purse Seiner	Transfer to the tugboat "Vinaches"	<p>Logbook not written correctly. <u>Serious violations:</u> Infractions related to (ICCAT 08-05, Art. 65: b (2nd, 3rd, 7th):</p> <ul style="list-style-type: none"> - the date and time of the catch and of the transfer - location of the catch and of the transfer missing - name of the tug boat and its ICCAT number missing 	<p>Farm of destination: Grup Balfego (Spain)</p> <ul style="list-style-type: none"> - The skipper estimates the caught quantity at: 35.000 kgs (300 BFTs) - Transfer Authorization for such catch amounts to 25.000 kgs (350 BFTs) - Differences: 10.000 kgs (+ 50 BFTs) - Tug boat for transfer was 'Vinaches' (1 cage) <p>The ICCAT observer notes: "During the fishing operation, together with the 11 purse seiners in JFO, there were 2 catamarans which helped the group searching for the schools of tunas, they also helped to maintain the net open (See photos # 2, 3, 4)"</p> <p>"All the cages attached to the towing vessels had tunas inside, even before the transfer. I asked why and they told me that was because of the attraction of the tunas."</p>
	0093/1	24 July 2010	Lis Myr/AC82609 9	Recreational (Pole & line, Baitboat)	2 BFT taken on board (148 and 135 cm, with total weight of 140 kg).	<p><u>Serious violation:</u> Intentional taking or retention of species in contravention of any applicable conservation management measure adopted by the ICCAT (i.e. ICCAT 08-05, Art 32: 'CPCs shall take the necessary measures to prohibit the catch and retention on board, transshipment or landing of more than one bluefin tuna in each sea trip').</p>	

	226/10	8 June 2010	Massabielle II/ST925329	Towing boat	Towing 1 cage (from three transfers)	<p>- 1. June 6. Catching vessels: St Sophie François II and III (France). Farm of destination: Malta Fish Farming. Weight: 58,800 kg (420 BFTs). Missing all information related to transfer as position, species and quantity, in violation of ICCAT 06-07 1a.</p> <p>- 2. June 6. Catching vessels: St Sophie François II y III (France). Farm of destination: Malta Fish Farming. Weight: 40 tons (950 BFTs). Missing all information related to transfer as position, species and quantity, in violation of ICCAT 06-07 1a.</p> <p>- 3. June 7. Catching vessels: St Sophie François II y III (France). Farm of destination: Malta Fish Farming. Weight: 29,600 kg (800 BFTs). Missing all information related to transfer as position, species and quantity, in violation of ICCAT 06-07 1a.</p>	
	FR/Bouan/2010/24	8 June 2010	Pierre Joseph Salvador/MA9 14222	Purse Seiner	BFT transferred to the tug boat TA Matthew 2 to "Ta' Matthew Fish Farms" in Malta.	<p>Serious violations:</p> <p>- 1. BCDs incompletely filled, regarding transfer information (ICCAT 09-11 Annex 1(4)).</p> <p>- 2. Transshipment at sea was carried out ICCAT 08-05, Art. 61).</p>	

	Inspection report	Inspection date	Vessel name	Vessel type	Operation	Infraction	Comments
GREECE	04	8 June 2010	"Nikos K" N.8 591	Long liner	Catch	<ul style="list-style-type: none"> - 1. Logbook incomplete (ICCAT 08-05, Art. 64) - 2. Fishing after the national quota had finished (a single 24 kg BFT) 	
ITALY	112/10	12 June 2010	Kleos MV 311	Towing boat	Towing 1 cage.	<p><u>Serious violations:</u> Multiple violations which taken together constitute a serious disregard of measures in force pursuant to the ICCAT:</p> <ul style="list-style-type: none"> - 1. BCD incomplete and inaccurate (ICCAT 08-05, Art. 94). - 2. No video record of transfer on board (ICCAT 08-05, Art. 93 and ICCAT 08-05, Art. 79). - 3. Missing information on logbook (ICCAT 08-05 Art. 65: b). 	<ul style="list-style-type: none"> -Farm of destination: Fish and Fish (Malta). - Purse seiner name: Morina (Libya)
	073/10	28 May 2010	Maria S.S. di Constantinopoli/NA2154	Supply vessel	Towing 2 cages, with no fish on board.	- 1. Serious violation: Operates without VMS system (ICCAT 08-05, Art. 87).	Operates for AJD Tuna Ranch (Malta).

	Air Surveillance/Sea patrol Daily Activity Report	7 June 2010	Marika	Recreational		- 1. Serious violation: The vessel was fishing during the closure of fishing season for recreational boat (ICCAT 08-05, Annex 8, 1d).	The inspection team imposed a penalty of € 1.000 because the vessel was fishing during the closure of fishing season for recreational boat (ICCAT 08-05, Annex 8, 1d). The FPV escorted the pleasure boat at Lampedusa port in order to seize the fish and the gear.
LIBYA	20100531 MISURATA	31 May 2010	Misurata	Tug boat	Towing 1 cage.	- 1. Infraction on VMS (ICCAT 08-05, Art. 87; ICCAT 06-07, Art 1d and ICCAT 03-14). VMS not operative.	
	113/10	18 June 2010	Al-Shafq	Long liner	With long lines and fish traps.	- 1. Pending verification for: Not fitted with VMS device (ICCAT 03-14, Art. 1).	No logbook, but inspector stated that fishing gear and holds had not been used for a long time.

	Inspection report	Inspection date	Vessel name	Vessel type	Operation	Infraction	Comments
SPAIN	AR/JM/JL/03	29 May 2010	Pepa Alonso	Tug boat (for the catch vessel Janvier Louis Raphael)	Towing 1 cage	- 1. Lack of original BCDs from two catch vessels (El Nuevo Elorz and El Nuevo Panchilleta) - Rec. 09-11 (Annex 3(4)) - 2. lack of information related to the transfer operation – Rec. 06-07 (1a) -	- Farm of Destination: Caladeros del Mediterraneo, Fuentes Group (Spain) -This tug boat tows a cage after a transfer declared by the French purse seiner Janvier Louis Raphael during a JFO together with the Spanish purse seiners “Nuevo Panchilleta” and “Nuevo Elorz”. Infringements: 1. No original BCDs on board. 2. Missing of information on the logbook about the transfer declarations: ICCAT numbers, data on the catching vessel. - Infringement of COUNCIL REGULATION (EC) No 302/2009, Article 34 on Market measures:
	No: 0004098	25 May 2010	La Frau Dos	Purse Seiner	Transfer took place the day before to the towing boat “El Coyote”	<u>Serious violation:</u> - 1. No compliance with the recording requirements related to the transfer of fish into cages - Rec. 08-05 (65a)	- Farm of destination: Balfego Tuna (Spain) - Keeps record of the catch made by the vessel Tio Gel Segon also the day before
	No: 501848	14 June 2010	El Coyote	Tug boat	Towing 1 cage. Procedence of the fish: Gepus and Leonardo Brull Segon	- 1. Incomplete information in the transfer declarations - Rec. 08-05 (76) - (Missing information related to the catch vessel in the transfer declaration)	- BFTs to be fattened at “Balfego Tuna”

	No: 501840	10 June 2010	Vinaches	Tug boat	Towing 2 cages. Procecence of the fish: Tio Gel Segon, La Frau Dos, Janvier Giordano, El Coyote (?)	- 1. Incomplete information in the transfer declarations - Rec. 08-05 (76) - (Missing information related to the catch vessel in the transfer declaration)	- BFTs to be fattened at "Balfego Tuna" - Comment of the inspector: "The inspection report closes by still waiting the authorization for the second transference No EC 2596/2/2010 from the tug boat El Coyote"
	No: 501683	23 June 2010	Juan Paredes Fernandez	Tug and auxiliary	Received the transfers of cages from Estela Nova and Tomás y Carmen	- 1. Two unregistered transfers - Rec. 06-07 (1a) - (The tugboats 'Tomas y Carmen' and 'Estela Nova' transferred two towing cages of BFT to "Juan Paredes Fernandez".)	- BFTs to be fattened at "Balfego Tuna"
	No: 501837	8 June 2010	Puig Campana	Tug boat	Towing cages. Procecence of the fish: Tio Gel Segon, Gerald Jean IV, La Frau Dos, Gerald Jean III, Gerard Luc IV and Anne Antoine II	- 1. Incomplete information in all the 8 transfer declarations - Rec. 08-05 (76) - (total amount: 163,600 kg.	- BFTs to be fattened at "Balfego Tuna"
	No: 501386	16 June 2010	Tomás y Carmen	Tug boat	Towing 1 cage.	-1. Two non registered transfers (related to the Juan Paredes Fernandez) - Rec. 08-05 (74) — from a total of 8 transfers. - 2. Missing information of the other vessel involved in the transference in the log-book - Rec. 06-07 (1a) -	- BFTs to be fattened at "Balfego Tuna"

	No: 501393	15 June 2010	Hernandez Aguado	Tug boat	Towing 1 cage. Procedence of the fish: El Nuevo Elorz and El Nuevo Panchilleta	- 1. Incomplete data on the transfer declaration - Rec. 08-05 (76) - - 2. Incomplete data on transfer information into the BCD - Rec. 09-11 (Annex 1(4)) -	- Farm of Destination: Caladeros del Mediterraneo, Fuentes Group (Spain)
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	Inspection report	Inspection date	Vessel name	Vessel type	Operation	Infraction	Comments
TURKEY	011/2010	12 June 2010	Fat Balıkcılık	Purse Seiner	Vessel fishing. Turkish coast guard did not allow the Inspector access physically.	- 1. <u>Serious violation</u> observed: Assault, resistance, intimidation, sexual harassment, interference with, or undue obstruction or delay of an authorized inspector or observer (ICCAT 08-05, Annex 8).	
	008/2010	13 June 2010	Halit Mollaoglu	Purse Seiner	Catch.	- 1. Authorization for transfer operation not presented (ICCAT 08-05, art. 75). - 2. Logbook incomplete (ICCAT 08-05, Annex 2). - 3. <u>Serious violation</u> : Failure to maintain sufficient records of catch and catch-related data in accordance with the Commission's reporting requirements or significant misreporting of such catch and/or catch-related data.	- The ICCAT observer on board didn't want to sign the Arago inspectors' report.
	FR/Bouan/2010/11	24 May 2010	Mahmut Kursun (TC 9193)	Tugging boat	Towing 1 cage.	- 1. <u>Serious violation</u> : Interference with the satellite monitoring system and/or operates without VMS system. VMS not working (ICCAT 08-05, Art. 87).	

	010/2010	12 June 2010	Mamuli Reis III	Purse Seiner	Vessel fishing. Turkish coast guard did not allow the Inspector access physically.	- 1. <u>Serious violation observed</u> : Assault, resistance, intimidation, sexual harassment, interference with, or undue obstruction or delay of an authorized inspector or observer (ICCAT 08-05, Annex 8).	
	009/2010	12 June 2010	Sursan I	Purse Seiner	Vessel fishing, next to "Fat Balıkcılık". Turkish coast guard did not allow the Inspector access physically.	- 1. <u>Serious violation observed</u> : Assault, resistance, intimidation, sexual harassment, interference with, or undue obstruction or delay of an authorized inspector or observer (ICCAT 08-05, Annex 8).	
	007/2010	12 June 2010	Trabzon Su Urunleri 1	Purse Seiner	Reported catch of 43.200 kg, above vessel's own quota of 25.200 kg and that of vessel "Kadir Kaptan 3" (18.00 kg), which has not been fishing this year, therefore all the quota has been given to Trabzon Su Urunleri 1.	- 1. <u>Serious violation</u> : Failure to maintain sufficient records of catch and catch-related data in accordance with the Commission's reporting requirements or significant misreporting of such catch and/or catch-related data. Not all compulsory information written on logbook (ICCAT 08-05, Art. 64), and not complying with ICCAT 08-05, Annex 8). - 2. Transfer authorization not available on board (ICCAT 08-05, Art. 75).	- No ICCAT observer's signature on logbook pages.

	Inspection report	Inspection date	Vessel name	Vessel type	Operation	Infraction	Comments
HONDURAS	Fr/Bouan/2010/10	24 May 2010	Milla-A	Tugging boat	Towing 1 cage.	<ul style="list-style-type: none"> - 1. Serious violation: Interference with the satellite monitoring system and/or operates without VMS system (ICCAT 08-05, Art. 87). - 2. Serious violation: Fishing without a license, permit or authorization issued by the flag CPC (ICCAT 08-05, Art. 54-55). 	- Owner: Malta Fish Farming.

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Sighting Information Sheet	1 June 2010	Zidni 2	Longliner	Fishing with driftnets.	<p>- 1. Fishing with driftnets, forbidden by ICCAT Rec. 03-04, Art. 3: "Contracting Parties, Cooperating non-Contracting Parties, Entities or Fishing Entities shall prohibit the use of driftnets for fisheries of large pelagics in the Mediterranean".</p> <p>- 2. Serious violation: Obstruction to the inspection, preventing it (ICCAT 08-05, Annex 8: 1k).</p>	- Illegal fishing operation in Spanish territorial waters.
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	Inspection report	Inspection date	Vessel name	Vessel type	Operation	Infraction	Comments
PANAMA	ESP 501831	03 June 2010	Viking X	Tugging boat	Towing 1 (empty) cage.	- 1. VMS not working (ICCAT 08-05, Art. 87).	- This tug boat delivers fish to Caladeros del Mediterráneo (Spain) (Fuentes Group).
	ESP 501839	09 June 2010	Viking X	Tugging boat	Towing 2 cages. Catching vessels: - Janvier Louis Raphael: 100 individuals, total weight of 10.000 kg, on 08 June 2010 - Nuevo Panchilleta: 1162 individuals, total weight of 98.000 kg, on 08 June 2010	- 1. Transferring ICCAT documents not validated by the observer (ICCAT 08-05, Art. 80). "The ICCAT Regional Observer on board the catching vessel, as referred to in the ICCAT Regional Observer Program (Annex 7), shall record and report upon the transfer activities carried out, verify the position of the catching vessel when engaged in transfer operation, observe and estimate catches transferred and verify entries made in the prior transfer operation as referred to in paragraph 75 and in the ICCAT transfer declaration as referred to in paragraph 76".	- BFTs to be fattened at Caladeros del Mediterráneo (Spain) (Fuentes Group).
	ESP 501846	13 June 2010	Antoni X	Tugging boat	Towing 1 cage. Catching vessels: - Nuevo Elorz: 700 individuals, total weight of 40000 kg, on 04 June 2010 - Janvier Louis Raphael: 100 individuals, total weight of 10000 kg, on 05 June 2010	- 1. ICCAT 08-05, Art. 76 - 2. ICCAT 08-05, Art. 94 and ICCAT 09-11, Annex 3.4	- BFTs to be fattened at Caladeros del Mediterráneo (Spain) (Fuentes Group).

	ESP 501845	12 June 2010	Triton X	Tugging boat	<p>Towing 1 cage.</p> <p>Catching vessel:</p> <p>-Nuevo Panchilleta: 2933 individuals, total weight 210.000 kg, on 07 June 2010</p>	<p>- 1. Observer did not validate the transfer declaration (ICCAT 08-05, Art. 81)</p> <p>Transferring ICCAT documents not validated by the observer (ICCAT 08-05, Art. 80).</p>	<p>- BFTs to be fattened at Caladeros del Mediterráneo (Spain) (Fuentes Group).</p>
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	Inspection report	Inspection date	Vessel name	Vessel type	Operation	Infraction	Comments
TUNISIA	FR/Bouan/2010/27	9 June 2010	Hergla 3	Tugging boat	<ul style="list-style-type: none"> - Towing 1 cage. - Two transfer operations took place: <ul style="list-style-type: none"> - 1st transfer, Catching vessel: Ghedir El Gholla, 160 individuals, total weight 500 kg, average weight 30 kg, on 07 June 2010. - 2nd transfer, Catching vessel: Mohamed Taher 2 (no information on catches or on transfer activity). 	<p><u>Serious violations:</u></p> <ul style="list-style-type: none"> - 1. Failure to maintain sufficient records of catch and catch-related data in accordance with the Commission's reporting requirements or significant misreporting of such catch and/or catch-related data. Missing information on BCDs (ICCAT 08-12, Annex 1). - 2. Serious violations: Other: Missing authorization number on declaration of transfer operation (ICCAT 08-05, Art. 76, Annex 3). BCD without compulsory information, and many anomalies in the transfer documentation. No number of BCD assigned for a catch of 160 tunas (5 tons), and many anomalies in the transfer documentation. - 3. Serious violations: Other: Missing logbook (ICCAT 06-07, Art. 1a). 	- To be fattened at "S Tuna Farm" (Tunisia).
	FR/Bouan/2010/07	23 May 2010	IBN Rachik	Purse seiner	Catch.	<ul style="list-style-type: none"> - 1. Missing standard information on logbook (ICCAT 08-05, Annex 2). - 2. Serious violation: Interference with the satellite monitoring system and/or operates without VMS system. Missing VMS (ICCAT 08-05, Art. 87). 	

	FR/Bouan/2010/20	9 June 2010	Mohamed Essadok	Purse Seiner	Catch.	<ul style="list-style-type: none"> - 1. BCD missing authorization number (ICCAT 09-11, Part I: 8). - 2. Logbook missing compulsory minimum specifications (ICCAT 08-05, Annex 2). - 3. Loose sheets (with pages not numbered) used as a BCD (ICCAT 08-05, Art. 64). - 4. No transfer authorisations on board (ICCAT 08-05, art. 75). 	
	229/10	8 June 2010	Selmen	Tugging boat	Towing 1 cage. With 3563 individuals and 179.370 kg. 10 transfer operations carried out with 8 vessels.	<p><u>Serious violations:</u> Multiple violations which taken together constitute a serious disregard of measures in force pursuant to the ICCAT:</p> <ul style="list-style-type: none"> - 1. Logbook not completed by the captain (ICCAT 06-07, Art. 1a). - 2. Missing appropriate documentation for transported fish (a BCD missing) (ICCAT 09-11, Art. 3) and incomplete documentation (BCDs and transfer declarations not numbered) (ICCAT 08-05, Art. 94 and). - 3. No transfer authorizations on board (ICCAT 08-05, art. 75). 	- Farm of destination: S. SMT (Tunisia) (Group Fuentes)

	Inspection report	Inspection date	Vessel name	Vessel type	Operation	Infraction	Comments
MALTA	FR/BOUAN/2010/06	22 May 2010	SERNA	Long liner	Putting lines in the water (some hooks still onboard).	- 1. ICCAT number and number of hooks missing from the logbook (ICCAT 08-05, Annex 2).	
	MLT_MADONNA TA'PINU 1	22 May 2010	Madonna Ta'Pinu 1	Long liner		- 1. Missing data on the logbook: (Number of hours, ICCAT number) Serious violation: Failure to maintain sufficient records of catch and catch-related data in accordance with the Commission's reporting requirements or significant misreporting of such catch and/or catch-related data. Logbook empty, but signed (ICCAT 08-05, Art. 64).	
	061/10	21 June 2010	Berendina Hermina	Tugging boat	Towing 2 cages: - 1st cage, Catching vessel: Regata, 540 individuals, 49000 kg total weight, on 14 June 2010. - 2nd cage, 1st transfer, Catching vessel: Alhilal, 70 BFTs, total weight 56000, on 3 June 2010. - 2nd cage 2nd transfer, Catching vessel: Deela, 96 BFTs, total weight 11000 kg, on 4 June 2010.	- 1. Logbook not maintained (ICCAT 08-05, Annex 3, and Footnote 5). - 2. Compulsory information missing off in the 4 transfer declarations on board: weight and number of the fish, number of ICCAT transfer declaration, ICCAT JFO number, etc. Information missing from Transfer declarations, BCD's (ICCAT 08-05, Art. 94).	BFTs to be fattened at "AJD Tuna" farm (Malta)
	FR/Bouan/2010/16	27 May 2010	Boubly	Longliner	Catch.	- 1. Missing information from logbook (ICCAT 08-05, Annex 2) , among them, weight and number of tuna caught.	

	060/10	20 June 2010	Budafell	Tugging boat	<p>Towing 2 cages:</p> <ul style="list-style-type: none"> - 1st transfer: Catching vessel: Granada, 230 BFTs, total weight 33350 kg, on 3 June 2010. - 2nd transfer: Catching vessel: Rossetin, 255 BFTs, total weight 36075 kg, on 24 May 2010. 	<p>Serious violations: Multiple violations which taken together constitute a serious disregard of measures in force pursuant to the ICCAT:</p> <ul style="list-style-type: none"> - 1. No video on board from the 2 transfers (ICCAT 08-05, Art 79 and Art 93). - 2. Missing information on logbook for the 2 transfers regarding position, weight, species, quantities, ICCAT no., catching vessel and date (ICCAT 08-05, Art. 64, and Annex 3, Footnote 5). - 3. Missing information from BCD's and transfer documents (ICCAT Articles under Recording requirements, Transfer Operations and Transshipment). - 4. Serious infringement issued under ICCAT 08-05, Art. 94). - 5. No VMS transmission since June 15. 	<ul style="list-style-type: none"> - BFTs (70 tons) to the farm Ta'Mattew Fish Farm (Malta). - Catching vessel names: Granada (Libya) and Ras Etin (Libya)
	083/10	17 June 2010	Madonna TA Pompei	Longliner	Swordfish and BFT catch.	<ul style="list-style-type: none"> - 1. Serious violation: Failure to maintain sufficient records of catch and catch-related data in accordance with the Commission's reporting requirements or significant misreporting of such catch and/or catch-related data. Logbook empty, but signed (ICCAT 08-05, Art. 64). 	150 kg of BFT
	FR/Bouan/2010/09	23 May 2010	Madonna TA' Pompei 1	Longliner	Swordfish, BFT and Dolphin fish catch.	<ul style="list-style-type: none"> - 1. Serious violation: Failure to maintain sufficient records of catch and catch-related data in accordance with the Commission's reporting requirements or significant misreporting of such catch and/or catch-related data. Logbook not filled correctly (ICCAT 08-05, Recording requirements). 	520 kg of BFT

	MLT_MADONNA TAL KARMNU	16 June 2010	Madonna a Tal Karminu	Longliner		- 1. Serious violation: Failure to maintain sufficient records of catch and catch-related data in accordance with the Commission's reporting requirements or significant misreporting of such catch and/or catch-related data. Logbook not filled (ICCAT 08-05, Recording requirements).	- No BFT on board
	075/10	11 June 2010	Silver King	Tugging boat	Towing 1 cage.	- 1. Missing pages of the transfer declaration. Logbook not bound (ICCAT 08-05, Art. 64).	- BFTs to be fatten at "Blue fin tuna Heras" farm. Catching vessel Ville D'Agde IV, 702 BFTs, total weight 100000 kg on 6 June 2010.
	056/10	9 June 2010	Sunfish	Tugging boat	Towing 1 cage.	- 1. Infringement under Art 4 (a) 2 of Regulation 1936/2001. Position of transfer and quantity of BFT missing (ICCAT 08-05, Art. 65). - 2. No video of the transfer.	- BFTs to be fatten at "AJD Tuna" farm. Catching vessel: Jean Marie Christian 3, 400 BFTs, 50.000 kg on 7 June 2010.
	078/10	10 June 2010	TA Mattew 2	Auxiliary vessel	Tuna cage nets on board.	- 1. No logbook on board to record transfer from catching vessel (Art 4 (a) 2 of Regulation 1936/2001) (ICCAT 08-05, Art. 64), although there was a personal logbook written in Maltese.	
	052/10	10 June 2010	TA Mattew	Tugging boat	Towing 1 cage. - 1st transfer operation: Catching vessel: Pierre Joseph Salvador, 1930 BFTs, total weight 187900 kg, on 7 June 2010. - 2nd transfer operation: Catching vessel: TA Mattew 2, 1930 BFTs, 187900 kg, on 10 June 2010.	- 1. Logbook not available. Transfer information on position, species, weight and quantity not entered for transfer of 10 June 2010 (ICCAT 08-05, Art. 64 and 65). - 2. No video of transfer (ICCAT 08-05, Art. 79).	- BFTs to be fatten at TA Mattew Fish Farm. (Malta)

ANNEX 2

Summary of observer comments related to Case Study 2

Name of the vessel	Comments from the observer
Nuevo Panchilleta	"I follow all transfer operations in the quartermaster. It was impossible to estimate amounts of fish transferred. The figures of the transfers are based on the four ICCAT transfer declaration."
Nuevo Elorz	"But the estimation of observer and the captain is the same because it's very difficult for the observer to estimate just with the video the number and the weight of bluefin tuna transferred in the cage."
Gepus	No comments were made.
La Frau Dos	"During the FOs it is clearly impossible to estimate the amount of fish unless diving in the net and have a good experience of BFT assessment (number and weight). My own assessments are therefore based on the Vessel Catch Declaration. The FTs are concerned by the same issue. Unless diving in the net to attend to the transfers you can't make any assessment during the operation. My assessments are based on the videos of the transfers made by the divers. Once again, if you have not been trained to assess the weight of BFT on a video it is difficult to calculate the number of fishes."
Leonardo Brull Segon	Doesn't report difficulties.
Tio Gel Segon	"For each fishing operation, the amount of fish estimated by the divers for the transfer"s request has been collected and reported on the fishing report under "observer record". "Due to certain circumstances like inexperience, low light, video unclear or many fishes, I have made an approximation on groups of young fishes for some transfers. This approximation has been written in the transfer report under "observer record". In all probability, as the size groups of fishes were mixed and the videos rather unclear, estimations of weights were impossible."
Pierre Joseph Salvador	"Captain of PJS said that no video would be taken, however observer saw three different video equipment being brought to the cage, one of which from PJS did not work (heard conversation with fish buyer) and was replaced by two scuba cameras from tug." "Observer assisted to all transfer operations from "the bridge" balcony and radar deck (10 and 12 metres from water surface) Assessing fish quantity in transfer from this position – or any other on board the catch vessel - was practically impossible."
St Sophie François II	No catch was made
St Sophie François III	"Please note that the observer didn't succeed in assessing the number and the quantity of tunas for the second and the third transfer operations. That's why the figures don't appear in the excel file." "Please note that the observer didn't succeed in assessing the number and the quantity of tunas for the second and the third transfer operations. That's why the figures don't appear in the excel file."
Ville D'Arzew II	No catch was made
Chrisderic II	No comments were made.
Ville D'Agde IV	No comments were made.
Gerald Jean III	"The weights of the BFT caught were estimated by the tugs divers." "Also it is appropriate to comment that in the transfer operations, the approximate weight of fish was established by the divers of the tugs. There were no negotiating dialogue between the fishing vessels and the tugs. This happened with extreme frequency, so that could lead to think that the weight of declared fish could be lower than it really was, this however is a simple assumption that should be monitored on farms." "On the other hand related to monitoring transfers, cages should have to be registered and marked by ICCAT, and would have a geographical position system. Actually the cages are numbered by the towing enterprises and can be renamed with no difficulty."
Gerard Luc III	"Regarding observations of fish transfer, ICCAT should enable recording video of high quality during each transfer (for example, underwater cameraman, employed and authorized by ICCAT). Every towing vessel should have cage reference number easily visible to the observer." "During the ICCAT ROB – BFT, the accent of ICCAT inspector's control should be more on the towing vessels and transfer cages, and less on the fishing vessels, since ICCAT observers were already present there."
Gerard Luc IV	Doesn't report difficulties.
Gerald Jean IV	No comments were made.
Jean Marie Christian III	"Methodology has been my observation of the divers when the opened of the door of the cage, watched the video after the transfer and try to count the number of specimens transferred (although it is of high difficulty due to the bad image that offered video)." "I believe this estimate is very superficial, for example, in my fishing operation there were an estimated 30 000 kg of bluefin tuna and yet were later found to be 50000 kg., Almost double. This can cause a problem when the amount of bluefin tuna left in the quota allocated to the vessel is very small and leaves no scope for large variations between the estimate and the estimated final transfer. They should use a more reliable estimate, although I do not know any." "The transfer process does not allow the observer to be present when the bluefin tuna are transferred. The only watch of the video allows us to estimate, whereas the videos were generally of poor quality and on a small screen, but let us see the time we need. Both I and the inspector who were on board thought it was impossible to estimate the right quantity of tuna, their weight and size, so I had to write in my documents as well as captain scored fishing boat. In this case, I believe that you should use a different system to count the individuals. For example, the observers could be in water and see first the transfer. By this way, it would be easier to assess more accurately the number of individuals."
Jean Marie Christian VI	"Tuna catch estimations-comprising both number and weight- from the vessel, are practically impossible for naked eye observers. Probably the only way to carry out a reliable rough estimation could be the visualization and interpretation of the sonar screen. Surface verification (by providing the observer with mask, snorkel, fins... etc) could be among the possible alternative solutions."
Jean Marie Christian VII	"Then, it would be interesting to have a training to recognize in recorded video footage the size of BFT. At least to have better monitoring, it would be interesting to create in the ROP observer-diver who would be able to take its own video footage to count BFT."
Janvier Louis Raphael	"ICCAT transfer declaration were checking and collating based on the paper I had on board received by the master of the vessel I was embarked"
Juanico Lucien Raphael	No catch was made
Janvier Giordano	"All the cages attached to the towing vessels had tunas inside, even before the transfer. I asked why and they told me that was because of the attraction of the tunas. Sometimes the same cage received the catch of two, or more, vessels."