

SEAPAC-Kingfisher AREP analysis summary

Area of Interest (AOI):	Pacific and Indian Ocean
Analysis Period:	01Jan2020 – 30Jun2020
Positional Sources:	AIS
Submitted To:	SEAPAC-Kingfisher Holdings Ltd.
Date Submitted:	09 th July 2020
Report Number:	20-368
Report Compiled By:	Tia Hobson
Quality Control By:	Natalie Tellwright

Vessel Activity Summary

During the 6-month period from January through to June 2020, OceanMind carried out AREP risk analysis for 5 carrier consignments delivered to SEAPAC-Kingfisher Holdings Ltd. These analyses provide independent validation of the legality and possible risks of these consignments. All risks in the analysis reports have been settled and are considered closed.

Analysis was conducted on an ad-hoc bases according to when SEAPAC-Kingfisher purchased product via 5 carrier consignments. The purpose of the risk analysis is to identify any potential illegal activity by the catching vessels and to provide SEAPAC-Kingfisher with recommendations for follow-up action to minimise and mitigate against risks.

The five carrier consignments of frozen tuna caught by purse seine fishing vessels were assessed for possible risks using AIS analysis.

Documentation was also reviewed for consistency and compared with the observed activities on AIS. All of the fishing trips were observed



in the Western Pacific Ocean. Where appropriate, the OceanMind team supported further investigations of these vessels, including reviewing vessel logbooks, emails, hatch temperature logbook / hatch plan, master interview, transhipment declarations, supply lists, receipts and fishing licenses to confirm compliance and support investigations by SEAPAC-Kingfisher.

The legality and possible risks of these consignments were reviewed by OceanMind and can be classified into 3 event categories for the carrier vessel explained in the Table 1, and 2 donor event categories explained in the Table 2 below.

Table 1 - Regulation compliance issues identified for carrier between 01Jan2020 – 30Jun2020

Event Category	Event Description	Monitoring Summary
Slow speeds	The vessel showed slow speeds and behaviour that indicates possible atsea transhipments took place.	Events identified - 9
1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1	Recommended to confirm with logbooks, master interview, transhipment declarations, and stowage plan.	Vessels involved - 4
Vessel meeting	The carrier and another vessel were observed with track and speeds consistent with meeting.	Events identified - 5
vessermeeting	Recommended to confirm with logbooks, emails, hatch temperature logbook / hatch plan, master interview, transhipment declarations, supply lists, and receipts.	Vessels involved - 3
Anchoring event	The vessel making a port call between receiving fish reported on the AREP and arriving at Thailand port. This event could enable unauthorized or unlicensed transhipment.	Events identified - 1
	Recommended to confirm with logbooks, master interview, port declarations, transhipment declarations, and hatch temperature	Vessels involved - 1



Table 2 - Regulation compliance issues identified for donor vessels between 01Jan2020 – 30Jun2020

Event Category	Event Description	Monitoring Summary
Valid fishing licenses	The vessel showed behaviour that indicates possible fishing activity inside an Exclusive Economic Zone (EEZ) without providing a valid fishing license. Recommended to request valid fishing license/s for the possible fishing inside the EEZ.	Events identified - 7 Vessels involved - 7
Catch Areas	The vessel showed behaviour that indicates possible fishing activity inside an EEZ that was not reported on the AREP. Recommended to confirm catch areas where the vessel operated inside.	Events identified - 8 Vessels involved - 8



A total of 5 carrier consignments were analysed. All shipments were tuna were caught by purse seine fishing vessels in the Western Pacific Ocean. A summary of all carrier consignments are described below in Table 3. **All risks have been settled and are considered closed.**

Table 3 - carrier consignments summary of activity

Carrier Vessel	Key risk description	Recommended checks for DOF	DOF Inspection results	Recommended checks for SEAPAC
SEA REEFER	Key risk A: The carrier displayed slow speeds for 12 hours between 20Apr2020 20:37Z – 21Apr2020 08:39Z inside FSM EEZ. The presence of any unreported transhipment and/or vessel meetings were not analysed.	Confirm the reason for the slow speed events and that no unauthorized or unlicensed at-sea transhipments took place inside the FSM EEZ. Logbooks Master Interview Transhipment declarations Stowage plan	The carrier met with fish bunker ANGEL 121 between 20Apr2020 – 21Apr2020 received fuel. These points are proved by checking logbook, bunker delivery note and master interview. RESOLVED	None
	Key risk B: The carrier displayed slow speeds for 5 days between 25Apr2020 04:04Z – 30Apr2020 07:21Z outside of the designated transhipment area for Pohnpei, FSM. The presence of any unreported transhipment and/or vessel	Confirm the reason for the slow speed events and that no unauthorized or unlicensed at-sea transhipments took place outside of the designated transhipment area for Pohnpei, FSM. Logbooks Master Interview	The carrier displayed slow speeds between 25Apr2020 – 30Apr2020 inside FSM EEZ while waiting instruction from the company. These points are proved by logbook, temperature logbooks and master interview.	None

COMMERCIAL IN CONFIDENCE Page 4



MIND	meetings were not analysed.	Transhipment declarations Stowage plan	RESOLVED	
	Key risk C: The carrier displayed slow speeds for 7 hours on 08Jun2020 between 02:29Z – 09:10Z inside FSM EEZ. The presence of any unreported transhipment and/or vessel meetings were not analysed.	Confirm the reason for the slow speed events and that no unauthorized or unlicensed at-sea transhipments took place inside the FSM EEZ. Also, confirm reason for why the carrier stopped transmitting on AIS. Logbooks Master Interview Transhipment declarations Stowage plan	The carrier displayed slow speeds on the 08May2020 inside FSM EEZ while waiting instruction from the company. These points are proved by logbook, temperature logbooks and master interview. RESOLVED	None
HAI FENG 728	Key risk A: The carrier demonstrated slow speeds on 07Aug2019 between 04:13Z – 06:48Z in the Japanese EEZ. No other vessels were detected on AIS in proximity.	Confirm reason for slow speeds and that no unauthorized or unlicensed at-sea transhipments took place in the EEZ of Japan. Vessel logbooks Emails Hatch temperature logbook / hatch plan Master Interview Transhipment declarations	The carrier demonstrated slow speed on 07 Aug 2019 because of high waves and strong winds. This is proved by an interview with the master on board. RESOLVED	None
	Key risk B: The carrier demonstrated slow speeds for 8 hours between 09Aug2019 17:26Z – 10Aug2019 01:32Z in the High Seas. No other	Confirm reason for slow speeds and that no unauthorized or unlicensed at-sea transhipments took place in the high seas.	The carrier demonstrated slow speed for 8 hours because of high waves and strong winds. This is proved	None



IVIIIED	vessels were detected on AIS in proximity.	Vessel logbooks Emails Hatch temperature logbook / hatch plan Master Interview Transhipment declarations	by an interview with the master on board. RESOLVED	
	Key risk C: The carrier demonstrated slow speeds for 12 hours on 16Oct2019 between 09:46Z –22:04Z inside the Nauru EEZ. The carrier appeared to have met with the carrier vessel Hai Feng No 648 (IMO: 8710132, MMSI: 354716000), which was not reported in the AREP and may have enabled an at-sea transhipment.	Confirm the reason for the meetings with Hai Feng No 648 and that no unauthorized or unlicensed at-sea transhipments took place inside the Nauru EEZ. Confirm if transfer of supplies or crew took place with supply lists for quantity needed and receipts of purchase. Vessel logbooks Emails Hatch temperature logbook / hatch plan Master Interview Transhipment declarations Supply lists Receipts	The carrier displayed slow speeds for 12 hours on 16 Oct 2019 because of problems with the cold storage, so they received the refrigerant, Freon from HAI FENG 648, no fish was loaded. RESOLVED Additional information from FCF of activities during this time confirm the slow speeds were for the sole purpose of transhipping Freon.	None
	Key risk D: The carrier demonstrated slow speeds for 4 hours on 02Dec2019 between 01:40Z – 15:23Z inside the Kiribati EEZ. The carrier met with the bunker vessel ANGEL 22 (MMSI 374604000, IMO 9191230, IRCS 3FVJ4) during this time period.	Confirm reason for slow speeds, the possible bunkering with ANGEL 22 and that no unauthorized or unlicensed at-sea transhipments took place on the Kiribati EEZ. Vessel logbooks Emails	The carrier displayed slow speeds on 02 Dec 2019 because this vessel received bunker from ANGEL 22. This is proved by checking logbook, bunker delivery receipt and interviewing master on board. RESOLVED	None



MIIMD				
		Hatch temperature logbook / hatch plan Master Interview Transhipment declarations Fuel Receipts		
	Key risk E: The carrier demonstrated slow speeds for 8 hours on 18Jan2019 between 09:46Z - 17:47Z inside the Kiribati EEZ. The carrier met with the bunker vessel ANGEL 38 (MMSI 538002930, IMO 9175743, IRCS V7MZ7) during this time period.	Confirm reason for slow speeds, the possible bunkering with ANGEL 38 and that no unauthorized or unlicensed at-sea transhipments took place on the Kiribati EEZ. Vessel logbooks Emails Hatch temperature logbook / hatch plan Master Interview Transhipment declarations Fuel Receipts	The carrier displayed slow speeds on 18 Jan 2020 because this vessel receive bunker from ANGEL 38. This is proved by checking logbook, bunker delivery receipt and interviewing master on board. RESOLVED	None
	Key risk F: The carrier was observed anchored 4 nm off the coast south of Zhoushan Island for 14 days between 28Jan2020 and 10Feb2020. The carrier was likely awaiting port entry. The carrier than went into the port near Ximatoucun on Zhoushan Island, China for 25 days between 10Feb2020 and 06Mar2020.	Confirm the reason for the anchoring and port call and that no product was loaded onto the vessel destined for Thailand which was not reported. Logbooks Master Interview Port declarations Transhipment declarations Hatch temperature	The reason for the anchoring off the south coast of Zhoushan Island was because the vessel waiting for company's order. Fishing vessel documentation and Zhous han discharged cargo information checked. RESOLVED	None
HIKARI 1	Key risk A: The carrier demonstrated slow speeds for 5.5 hours on 22Feb2020	Confirm the reason for the slow speeds and that no unauthorised or	The carrier displayed slow speed on 22Feb2020 in FSM EEZ because waiting instruction from	None

Page 8



IVIIIVE	between 00:57Z – 06:26Z in FSM EEZ. During this period no other vessel was observed on AIS in close proximity.	unlicensed at-sea transhipments took place. Logbooks Hatch temperature logbooks Emails Master Interview Transhipment declarations	the company. These are proved by checking logbooks, temperature logbooks, email and interview with the master onboard. RESOLVED	
	Key risk B: The carrier demonstrated slow speeds for 2.5 days between 22Feb2020 23:57Z – 25Feb2020 04:58Z on the High Seas Pocket 1. During this period no other vessel was observed on AIS in close proximity.	Confirm the reason for the slow speeds and that no unauthorised or unlicensed at-sea transhipments took place. Logbooks Hatch temperature logbooks Emails Master Interview Transhipment declarations	The carrier displayed slow speed 23 - 25Feb2020 in HSP 1 because waiting instruction from the company. These are proved by checking logbooks, temperature logbooks, email and interview with the master onboard. RESOLVED	None
	Key risk C: The carrier demonstrated 2 slow speed events inside High Seas Pocket 2: • 2 days between 28Feb2020 21:47Z – 01Mar2020 20:29Z • 2 days between 01Mar2020 03:56Z – 03Mar2020 05:02Z During both events no other vessel was observed on AIS in close proximity.	Confirm the reason for these slow speed events and that no unauthorised or unlicensed at-sea transhipments took place. Logbooks Hatch temperature logbooks Emails Master Interview Transhipment declarations	The carrier displayed slow speed 29Feb – 1Mar2020 and 1 – 3Mar2020 in HSP 2 because waiting instruction from the company. These are proved by checking logbooks, temperature logbooks, email and interview with the master onboard. RESOLVED	None
NEW TAKATSUKI	Key risk A: The carrier displayed slow	Vessel logbooks Master Interview	The carrier displayed slow speed for 5.5 days because this vessel	None



IALLIAD				
	speeds for 5.5 days between 01Jan2020 08:59Z – 06Jan2020 20:58Z inside the FSM EEZ and High Seas Pocket 2. No other vessels were observed on AIS in proximity.	Hatch temperature logbook Transhipment declarations Stowage plan	waiting for company's order. This is proved by checking logbook and interview master on board. RESOLVED Additional information from TriMarine of agent correspondence with the captain confirms the vessel was waiting for company orders.	
	Key risk B: The carrier displayed slow speeds for 15.5 days between 07Jan2020 11:22Z – 23Jan2020 21:04Z inside the FSM EEZ, High Seas Pocket 2 and Nauru EEZ. No other vessels were observed on AIS in proximity.	Vessel logbooks Master Interview Hatch temperature logbook Transhipment declarations	The carrier displayed slow speed for 15.5 days because this vessel waiting for company's order. This is proved by checking logbook and interview master on board. RESOLVED Additional information from TriMarine of agent correspondence with the captain confirms the vessel was waiting for company orders.	None
	Key risk C: The carrier displayed slow speeds for 8 hours between 11Mar2020 16:13Z- 12Mar2020 00:02Z inside High Seas Pocket 2. Carrier met with bunker vessel ANGEL 17 (IMO 9208605) for 4 hours on 11Mar2020 between 20:00Z – 23:59Z.	Vessel Logbooks Master Interview Hatch temperature logbook and e- logbook Transhipment declarations Stowage plan Fuel Receipts	The carrier displayed slow speed for 8 hours because this vessel receive fuel from bunker vessel ANGEL 17. This is proved by checking logbook, bunker delivery receipt and interview master on board. RESOLVED	None



A total of 9 donor vessels were analysed. All were tuna were caught by purse seine fishing vessels in the Western Pacific Ocean. A summary of all the donor vessels are described below in Table 4. **All risks have been settled and are considered closed.**

Table 4 -Donor vessel summary of activity

vessel vess	essel on <u>or</u>	areas iginal AREP	Observed catch areas on AIS	areas on <u>resubmitted</u> AREP	Key risk description	Recommended checks for DOF
I HARIJ I	Marsha Narsha N FAR D. 666 F Fisl Kin	hing trip 1 PNG EEZ SM EEZ all Islands EEZ auru EEZ hing trip 2 PNG EEZ SM EEZ hing trip 3 ribati EEZ auru EEZ PNG EEZ SM EEZ SM EEZ	Fishing trip 1: 09Dec2019 – 09Jan2020 Nauru EEZ (2019) Marshall Islands EEZ (2019) PNG EEZ (2019) FSM EEZ (2019 & 2020) Fishing trip 2: 15Jan2020 – 04Feb2020 FSM EEZ PNG EEZ Nauru EEZ Vessel has gap on AIS between 20Jan2020 – 26Jan2020, so all activities and catch areas cannot be confirmed.	Marshall Islands 2019 FSM 2019 & 2020 PNG 2019 & 2020 Nauru 2020 Kiribati 2020	Vessel has gap on AIS for fishing trip 2 between 20Jan2020 – 26Jan2020 and fishing trip 3 between 13Feb2020 – 01Mar2020, so all activities and catch areas cannot be confirmed. Vessel lacks fishing license for Nauru 2019 fishing activity.	Request VMS data for reported trip dates for fishing trip 2 (20Jan2020 – 26Jan2020) and fishing trip 3 (13Feb2020 – 01Mar2020) to confirm vessel activities and catch areas. Confirm valid fishing license for Nauru 2019 fishing activity. RESOLVED

COMMERCIAL IN CONFIDENCE Page 10



141114						
			13Feb2020– 09Mar2020 PNG EEZ Kiribati EEZ Nauru EEZ Vessel has gap on AIS between 13Feb2020 – 01Mar2020, so all activities and catch areas cannot be confirmed.			
HAI FENG 728	WIN RICH NO. 707	Kiribati EEZ Tuvalu EEZ PNG EEZ	-	Kiribati EEZ Tuvalu EEZ PNG EEZ	Vessel had a gap on AIS between 13Oct2019 – 10Nov2019, so all activities and catch areas cannot be confirmed.	Request VMS data for the fishing trip dates (13Oct2019– 12Nov2019) to confirm vessel activities and catch areas. RESOLVED
	MATHAWM ARFACH	Marshall Islands EEZ	FSM EEZ High seas	FSM EEZ FAO 71 WCPFC	Catch area was misreported. Vessel submitted invalid license (FSM – 119) for FSM.	Confirm vessel's catch areas. Confirm valid fishing license for FSM. RESOLVED
HIKARI 1	MELISSA	Marshall Islands EEZ	-	Kiribati EEZ Tuvalu EEZ Tokelau EEZ	Vessel has not transmitted on AIS since 20Nov2019, so all activities and catch areas cannot be confirmed.	Request VMS data for trip date (12Feb2020 – 06Apr2020) to confirm vessel activities and catch areas. Confirm valid fishing license for FSM.

Page 12



14111						
					Vessel submitted invalid license (FSM – 119) for FSM.	RESOLVED
	MARIELLE	Marshall Islands EEZ	-	Kiribati EEZ Tuvalu EEZ	Vessel has not transmitted on AIS since 02Feb2020, so all activities and catch areas cannot be confirmed Vessel submitted invalid license (FSM – 119) for FSM.	Request VMS data for trip date (13Feb2020 – 11Apr2020) to confirm vessel activities and catch areas. Confirm valid fishing license for FSM. RESOLVED
	JIH YU NO.868	Marshall Islands EEZ	Nauru EEZ	Nauru EEZ	Catch area was misreported. Vessel submitted invalid license (FSM – 119) for FSM.	Confirm vessel's catch areas. Confirm valid fishing license for Nauru. RESOLVED
	LOMETO	Marshall Islands EEZ	Marshall Islands EEZ High seas Tuvalu EEZ Kiribati EEZ FSM EEZ	Kiribati EEZ Tuvalu EEZ FSM EEZ FAO 71 WCPFC	Vessel had gap on AIS between 24Mar2020— 26Mar2020, so all activities and catch areas cannot be confirmed. Vessel submitted invalid license (FSM – 119) for FSM.	Request VMS data for trip date (10Mar2020 – 14Apr2020) to confirm vessel activities and catch areas. Confirm valid regional fishing license. RESOLVED



SEA REEFER	OCEAN CONQUEST	FSM EEZ Kiribati EEZ	FSM EEZ Kiribati EEZ Nauru EEZ Marshall Islands EEZ High seas	Kiribati EEZ Nauru EEZ Marshall Islands EEZ FSM EEZ FAO 71	Catch area was misreported.	Confirm vessel's catch areas. RESOLVED
NEW TAKATSUKI	QUEEN ISABELLA 88	Marshall Islands EEZ	Marshall Islands EEZ Kiribati EEZ Nauru EEZ Tuvalu EEZ High seas	Marshall Islands EEZ Kiribati EEZ Nauru EEZ Tuvalu EEZ High seas	Valid fishing licenses for Marshall Islands, Kiribati, Nauru, and Tuvalu not confirmed.	Confirm valid fishing license for Marshall Islands, Kiribati, Nauru and Tuvalu. RESOLVED

Disclaimer: The analysis is based upon resources and data available to OceanMind Limited. The client should corroborate this analysis utilising alternative means if any action is to be taken based upon the analysis provided. This disclaimer is superseded by any contract OceanMind Limited already has with the receiving party. This document may include material from © 2020 Spire, © 2020 Orbcomm, © 2020 Maxar Technologies Ltd, © 2020 IHS Global Ltd, © 2020 Flanders Marine Institute, and © 2020 OceanMind Limited. In all instances, all rights are reserved.