

## **SEAPAC-Kingfisher AREP analysis summary**

Area of interest (AOI):	Pacific Ocean
Analysis period:	01Jul2020 – 30Jun2021
Positional sources:	AIS
Submitted to:	SEAPAC-Kingfisher Holdings Ltd.
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## **Vessel Activity Summary**

During the 1-year period from July 2020 through to June 2021, OceanMind carried out AREP risk analysis for 8 carrier consignments supplying 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 resolved and are considered closed.

Analysis was conducted on an ad-hoc bases according to when SEAPAC-Kingfisher purchased product. 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. Both fisheries and labour risks were reviewed and reported on.

The eight carrier consignments of frozen tuna caught by purse seine fishing vessels were assessed for possible fisheries risks using AIS analysis. Documentation was also reviewed for consistency and compared with the observed activities on AIS. Vessels were also cross referenced against a labour vessel of interest (VOI) list to identify any possible labour risks. The labour VOI list gathers together publicly available information, using desk-based



research, about vessels that have been accused of involvement with labour abuse. 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. This additional information supported further investigation and resolved the fisheries risks. SEAPAC-Kingfisher reviewed labour risks within the context of the Seafood Task Force Code of Conduct.

The legality and possible risks of these consignments were reviewed by OceanMind and can be classified into 4 risk categories for the carrier vessel explained in the Table 1, and 5 donor risk categories explained in the Table 2 below.

Table 1 - Risk identified for carriers between 01Jul2020 – 30Jun2021.

Risk category	Risk description	Monitoring summary
Possible	The vessel showed slow speeds and behaviour that indicates possible atsea transhipments took place.	Events identified – 16
transhipment	Recommended to confirm with logbooks, master interview, transhipment declarations, and stowage plan.	Vessels involved - 5
Vessel meeting	The vessel was observed in proximity to a secondary vessel on AIS, with track and speeds consistent with a meeting.  Recommended to confirm with logbooks, emails, hatch temperature logbook / hatch plan, master interview, transhipment declarations, supply lists, and receipts.	Events identified - 3  Vessels involved - 3
Unreported port call	The vessel made a port call between receiving the reported fish and arriving at Thailand port. This event could enable unauthorized or unlicensed transhipment/loading.	Events identified - 1
	Recommended to confirm with logbooks, master interview, port declarations, transhipment declarations, and hatch temperatures.	Vessels involved - 1



	The vessel had an AIS outage for an extended period of time before arriving at Thailand port. This event could enable unauthorized or	
AIS outage	unlicensed transhipment.	Events identified - 1
	Recommended to confirm reason for this AIS outage with VMS data, logbooks, master interview, port declarations, transhipment declarations, and hatch temperatures.	Vessels involved - 1

Table 2 - Risks identified for donor vessels between 01Jul2020 – 30Jun2021.

Risk category	Risk description	Monitoring summary
Unlicensed fishing	The vessel showed behaviour that indicates possible fishing activity inside an Exclusive Economic Zone (EEZ) without providing a valid fishing license.	Events identified - 8  Vessels involved - 8
	Recommended to request valid fishing license/s for the possible fishing inside the EEZ.	
Unreported fishing	The vessel showed behaviour that indicates possible fishing activity inside an EEZ that was not reported on the AREP.	Events identified - 19
Officported fishing	Recommended to confirm catch areas where the vessel operated inside.	Vessels involved - 19
	The vessel was named on a list of reported cases where a member a crew member was listed as having died while working on the vessel.	Events identified - 1
Labour risk		Vessels involved - 1
	A review of documentation such as the associated police, autopsy and observer reports, as well as the vessel health and safety handbook and 2019 social audit was conducted.	



	The vessel made a port call during the declared fishing trip dates, this event could enable unauthorized or unlicensed transhipment.	Events identified - 1
Unreported port call	Recommended to confirm reason for the port call, where the vessel entered.	Vessels involved - 1
Misreported trip dates	The vessel showed behaviour that indicates possible fishing activity started or ended the fishing trip outside the declared fishing trip dates report on the AREP.	Events identified - 1  Vessels involved - 1
	Recommended to confirm fishing trip dates that the vessel operated between.	vesseis ilivolveu - 1



## **Carrier consignments**

A total of 8 consignments were analysed. All shipments were tuna and 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 resolved 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
Carrier 1	Key risk A:  The carrier displayed slow speeds for 11 days between starting inside the moving into .	Confirm the reason for the slow speeds in AIS transmission and that no unlicensed or unauthorised transhipments took place inside the or  Vessel Logbook Master Interview Hatch Temperature logbook Stowage Plan Transhipment Declarations	The carrier displayed slow speeds between	None
Carrier 2	Key risk A:  The carrier displayed slow speeds for 7 hours between inside the	Confirm the reason for the slow speeds in AIS transmission and that no unlicensed or unauthorised transhipments took place inside the .  Vessel Logbook Master Interview Hatch Temperature logbook	The carrier met with 1 fishing vessel on to transfer salt and supply.  These points are proved by checking logbook, hatch temp logbook, delivery receipts and interview master on	None



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	Stowage Plan Transhipment Declarations	board.  RESOLVED	
Key risk B:  The carrier displayed slow speeds for 6 hours on between inside the	Confirm the reason for the slow speeds in AIS transmission and that no unlicensed or unauthorised transhipments took place inside the  Vessel Logbook Master Interview Hatch Temperature logbook Stowage Plan Transhipment Declarations	The carrier met with 1 fishing vessel on to transfer salt and supply.  These points are proved by checking logbook, hatch temp logbook, delivery receipts and interview master on board.  RESOLVED	None
Key risk C:  The carrier displayed 8 slow speed events inside  9 hours between  9 hours on between  1.5 days between  15 hours on between  3.5 days	Confirm the reason for all 8 slow speed events on AIS transmission and that no unlicensed or unauthorised transhipments took place inside the  Vessel Logbook Master Interview Hatch Temperature logbook Stowage Plan Transhipment Declarations	The carrier met with 7 fishing vessels on, met with 2 fishing vessels on, met with 1 fishing vessel on for transfer salt and supply. The carrier displayed slow speeds between because waiting for fishing vessel. The carrier met 1 fishing vessel for transfer salt and supply on The carrier met with 1 fishing vessel on and met with 1 fishing vessel. for transfer fishing net on	None



MIND				
	<ul> <li>19 hours between</li> <li>9 hours between</li> <li>1 day</li> </ul>		These points are proved by checking logbook, hatch temp logbook, delivery receipts and interview master on board.  RESOLVED	
Carrier 3	No risks were identified for the carrie	r.		
Carrier 4	Key risk A:  The carrier vessel displayed a period of slow speeds within the between — between — for 9 hours. The Carrier 4 met with another carrier vessel between — and	Confirm the reasons for the slow speed event, the unreported vessel meeting with other carrier vessel and that no unauthorized or unlicensed at sea transhipments took place within  Vessel Logbook Master Interview Emails Hatch Temperature logbook Stowage Plan Transhipment Declarations	The carrier was drifting in for 9 hours waiting to transfer technician to the other carrier vessel.  These points were proved by checking logbooks, emails, and an interview with the master.  RESOLVED	None



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Carrier 5	Key risk A:  During the port call in the carrier appeared have 2 unreported vessel meetings.  • Donor fishing vessel for 11 hours on between between 16 hours on between 16 hours on between 17 hours on between 18 hours on between 19 hours on 19 ho	Confirm the reason for these meetings and that no unauthorised or unlicensed at-sea transhipments took place inside . If a transfer of supplies took place, confirm this with supply lists for quantity needed and receipts of purchase.  Vessel Logbook Master Interview Emails Hatch Temperature logbook Stowage Plan Transhipment Declarations Supply lists Receipts	The carrier met with 2 unreported fishing vessels to receive fishing net and transfer of salt.  These points were proved by checking logbooks, mate's receipt, and an interview with the master.  RESOLVED	None
	Key risk B:  The carrier stopped transmitting on AIS on while anchored in .  The carrier reported on the AREP that date of its last port call was on however this cannot be confirmed.	Confirm the reason for the outage in AIS transmission and that no unlicensed or unauthorised transhipments took place during this time.  Request VMS data from flag state between to confirm vessels activities during AIS outage.  Also confirm the date of the carrier's last port call.  Vessel Logbook  Master Interview Engine logbook  Hatch Temperature logbook	The carrier stopped transmitting on AIS because of bad weather between, no unlicensed or unauthorised transhipments took place.  These points were proved by checking logbooks and an interview with the master.  RESOLVED	None



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		Stowage Plan Port Declaration Transhipment Declarations VMS data from flag state		
	Key risk A: The carrier displayed slow speeds for 23 days between on the above	Confirm the reason for the slow speeds and that no unlicensed or unauthorised transhipments took place on the  Vessel Logbook Master Interview Emails Hatch Temperature logbook Stowage Plan Transhipment Declarations	The carrier was drifting in the for 23 days waiting for certificate.  These points were proved by checking certificate, logbook, voyage memo, and stowage plan.  RESOLVED	None
Carrier 6	Key risk B: The carrier displayed slow speeds for 2 hours between  on the high seas above No other vessels were observed on AIS in proximity.	Confirm the reason for the slow speeds and that no unlicensed or unauthorised transhipments took place on the Vessel Logbook Master Interview Emails Hatch Temperature logbook Stowage Plan Transhipment Declarations	The carrier was drifting in the for 2 hours waiting to enter port.  These points were proved by checking logbook, voyage memo, and stowage plan.  RESOLVED	None
	Key risk C: The carrier displayed slow speeds for 5.5 hours between  - con the high seas above	Confirm the reason for the slow speeds and that no unlicensed or unauthorised transhipments took place on the	The carrier was drifting in the for 5.5 hours waiting to enter port.  These points were proved by	None



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	vessels were observed on AIS in proximity.	Vessel Logbook Master Interview Emails Hatch Temperature logbook Stowage Plan Transhipment Declarations	checking logbook, voyage memo, and stowage plan.  RESOLVED	
	Key risk D:  During the port call in  the carrier appeared to meet with 2 unreported vessels.  • Purse seine fishing vessel 1 for 5.5 days between	confirm this with supply lists for quantity needed and receipts of purchase.	During the port call in the carrier appeared to meet with 2 fishing vessels cargo was loaded, and later cargo was offloaded.  These points were proved by checking logbook, voyage memo, and stowage plan.  RESOLVED	None
	Key risk E:  The carrier displayed slow speeds for 2 hours on	Confirm the reason for the slow speeds and that no unlicensed or unauthorised transhipments took place inside  Vessel Logbook Master Interview	The carrier drifted for 2 hours inside because repaired main engine.  These points were proved by checking logbook, voyage memo, and stowage plan.	None



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	Emails Hatch Temperature logbook Stowage Plan Transhipment Declarations	RESOLVED	
Key risk F: The carrier displayed slow speeds for 5 hours on inside  No other vessels were observed on AIS in proximity.	Confirm the reason for the slow speeds and that no unlicensed or unauthorised transhipments took place inside  Vessel Logbook Master Interview Emails Hatch Temperature logbook Stowage Plan Transhipment Declarations	The carrier drifted for 5 hours inside because waiting for company's order.  These points were proved by checking logbook, voyage memo, and stowage plan.  RESOLVED	None
Key risk G:  The carrier displayed slow speeds for 14.5 hours on inside inside wessels were observed on AIS in proximity.	Confirm the reason for the slow speeds and that no unlicensed or unauthorised transhipments took place inside  Vessel Logbook Master Interview Emails Hatch Temperature logbook Stowage Plan Transhipment Declarations	The carrier drifted for 14.5 hours inside because repaired main engine.  These points were proved by checking logbook, voyage memo, and stowage plan.  RESOLVED	None
Key risk H: The carrier was observed anchored inside at LAT ; LNG for 7 days between	Confirm the reason for the anchoring's and port calls and that no product was loaded onto the vessel destined for Thailand which was not	The carrier was entered port for offloading cargo between .	None



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	and	reported.  Logbooks  Master Interview  Transhipment declarations  Hatch temperature logbooks  Emails  Stowage plan  Landing declaration  Stowage plan  Receipts  Supply list	These points were proved by checking logbook, voyage memo, and stowage plan.  RESOLVED	
Carrier 7	Key risk A: The carrier displayed slow speeds for 12 hours between  - inside  No other vessels were observed on AIS in proximity.	Confirm the reason for the slow speeds and that no unlicensed or unauthorised transhipments took place inside  Vessel Logbook Master Interview Emails Hatch Temperature logbook Stowage Plan Transhipment Declarations	The carrier was drifting in for 12 hours because of engine repair.  These points were proved by checking logbooks and an interview with the master.  RESOLVED	None
	Key risk B: The carrier displayed slow speeds for 7.5 hours between  - inside  No other vessels were observed on AIS in proximity.	Confirm the reason for the slow speeds and that no unlicensed or unauthorised transhipments took place inside  Vessel Logbook Master Interview	The carrier was drifting inside for 7.5 hours because of engine repair.  These points were proved by checking logbooks and an interview with the master.	None



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		Emails Hatch Temperature logbook Stowage Plan Transhipment Declarations	RESOLVED	
	Key risk C: The carrier displayed slow speeds for 6.5 hours between inside . No other vessels were observed on AIS in proximity.	Confirm the reason for the slow speeds and that no unlicensed or unauthorised transhipments took place inside  Vessel Logbook Master Interview Emails Hatch Temperature logbook Stowage Plan Transhipment Declarations	The carrier displayed slow speeds inside for 6.5 hours waiting to enter port.  These points were proved by checking logbooks and an interview with the master.  RESOLVED	None
	Key risk D:  The carrier displayed slow speeds for 10 hours on between inside	Confirm the reason for the slow speeds and that no unlicensed or unauthorised transhipments took place inside  Vessel logbooks Master Interview Emails Hatch temperature logbook Stowage plan Transhipment declarations	The carrier was drifting inside for 10 hours because of engine repair.  These points were proved by checking logbooks and an interview with the master.  RESOLVED	None
Carrier 8	Key risk A:  The carrier displayed slow speeds for 5 days between  - inside	Confirm the reason for the slow speeds and that no unlicensed or unauthorised transhipments took place inside .	The carrier was drifting in for 5 days waiting for instructions from the company.  These points were proved by	None



No other vessels were observed on AIS in proximity.	Vessel Logbook Master Interview Emails Hatch Temperature logbook Stowage Plan Transhipment Declarations	checking logbooks, and an interview with the master.  RESOLVED	
Key risk B:  The carrier displayed slow speeds for 2 days between inside  No other vessels were observed on AIS in proximity.	Confirm the reason for the slow speeds and that no unlicensed or unauthorised transhipments took place inside  Vessel Logbook Master Interview Emails Hatch Temperature logbook Stowage Plan Transhipment Declarations	The carrier was drifting in for 2 days waiting for port entry.  These points were proved by checking logbooks, and an interview with the master.  RESOLVED	None



A total of 21 donor vessels were analysed. All 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 resolved and are considered closed.

Table 4 -Donor vessel summary of activity

Carrier vessel	Donor vessel	Reported catch areas on <u>original</u> AREP	Observed catch areas on AIS	Reported catch areas on <u>resubmitted</u> AREP	Key risk description	Recommended checks for DOF
Carrier 1	Donor fishing vessel 1		-		Vessel had a gap on AIS between , so all activities and catch areas cannot be confirmed.	Request VMS data from flag state / FFA for reported trip dates ( ) to confirm vessel activities and catch areas.  RESOLVED
Carrier 2	Donor fishing vessel 1				Vessel did not report valid licenses for and .	Confirm valid fishing licenses for , , , , , , and and .
	Donor fishing vessel 2*				Vessel did not report valid license for FSM.	Confirm valid fishing license for FSM.  RESOLVED



141114	<u> </u>					
					Vessel did not report valid licenses for and and .	Confirm valid fishing license for , , , , , , , , , , , , , , , , , , and , , .
					Catch area was misreported.	Request VMS data for the confirmed trip dates
	Donor fishing vessel 3				Vessel had multiple gaps on AIS between , so all vessel	( ) to confirm vessel activities and catch areas.
					activities and catch areas cannot be confirmed.	Confirm reason and request port declaration with the
				Confirm reason for port call between	vessel agent for the port call in .	
					,	RESOLVED
	Donor fishing	shing		Vessel has a gap on AIS between , so all activities and catch areas cannot be confirmed.	Request VMS data for the fishing trip dates ( ) to confirm vessel activities and catch areas.	
Carrier 3	vessel 1			Catch area was misreported.	Confirm vessel's catch areas.  Confirm valid fishing license	
					Vessel submitted invalid license ( ) for	for and and RESOLVED
	Donor				Catch area was misreported.	Confirm vessel's catch areas. Confirm valid fishing license
	fishing vessel 2				Vessel submitted invalid license ( ) for	for and and RESOLVED



1411141					
				Fishing trip 1 Start date of fishing trip 1 could not be confirmed.	Confirm start of the fishing trip date.
	Donor fishing vessel 3	-	4	Vessel only started to transmit on AIS on for fishing trip 1, and for fishing trip 2 the vessel has a gap on AIS between, so	Request VMS data for the fishing trip 1 ( ) and fishing trip 2 ( ) to confirm vessel activities and catch areas.
				all activities and catch areas cannot be confirmed.	Confirm valid fishing license for
				Vessel submitted invalid license ( ) for	RESOLVED
	Donor fishing vessel 4	-		Vessel had gaps on AIS between and so all activities and catch areas cannot be confirmed.  Vessel submitted invalid license ( ) for	Request VMS data for the fishing trip dates ( ) to confirm vessel activities and catch areas.  Confirm valid fishing license for
				Vessel was observed in port between .	RESOLVED
	Donor fishing vessel 5	-		Vessel does not transmit on AIS outside of port, so all activities and catch areas cannot be confirmed.	Request VMS data for the fishing trip dates ( ) to confirm vessel activities and catch



141114					
				Vessel submitted invalid license ( ) for	areas.  Confirm valid fishing license for
					RESOLVED
Carrier 4	Donor fishing vessel 1	-	Ŧ	The vessel did not transmit on AIS outside of port during the reported trip dates so vessel activities and catch areas could not be determined.	Request VMS data for the reported fishing trip dates ( ) to confirm vessel activities and catch areas.  RESOLVED
Carrier 5	Donor fishing vessel 1	-		Vessel had gap on AIS between , so all activities and catch areas cannot be confirmed	Request VMS data for the reported fishing trip dates ( ) to confirm vessel activities and catch areas.  RESOLVED
	Donor fishing vessel 1	-		Vessel had gap on AIS between , so all activities and catch areas cannot be confirmed.	Request VMS data for fishing trip ( ) to confirm vessel activities and catch areas.  RESOLVED
Carrier 6	Donor fishing vessel 2	-		Vessel had gap on AIS between , so all activities and catch areas cannot be confirmed.	Vessel had gap on AIS between , so all activities and catch areas cannot be confirmed.  RESOLVED



Carrier 7	Donor fishing vessel 1	-	Vessel had gap on AIS between , so all activities and catch areas cannot be confirmed.	Request VMS data for fishing trip ( ) to confirm vessel activities and catch areas.
	Donor fishing vessel 2	-	Vessel had gap on AIS between , so all activities and catch areas cannot be confirmed.	Request VMS data for fishing trip ( ) to confirm vessel activities and catch areas.
	Donor fishing vessel 3	-	Vessel had gap on AIS between , so all activities and catch areas cannot be confirmed.	Request VMS data for fishing trip ( ) to confirm vessel activities and catch areas.
	Donor fishing vessel 4		Vessel had gap on AIS between  1, so all activities and catch areas cannot be confirmed.	Request VMS data for fishing trip ( ) to confirm vessel activities and catch areas.
Carrier 8	Donor fishing vessel 1	-	Fishing trip 1  Vessel had a gap on AIS  , so all activities and catch areas cannot be confirmed.  Fishing trip 2	Vessel had a gap on AIS trip 1 ( ) and trip 2 ( ) , so all activities and catch areas cannot be confirmed.



		Vessel had a gap on AIS, so all activities and catch areas cannot be confirmed.	RESOLVED
Donor fishing vessel 2		Vessel had a gap on AIS , so all activities and catch areas cannot be confirmed.	Vessel had a gap on AIS , so all activities and catch areas cannot be confirmed.  RESOLVED
Donor fishing vessel 3		Vessel had a gap on AIS , so all activities and catch areas cannot be confirmed.	Request VMS data for fishing trip ( ) to confirm vessel activities and catch areas.  RESOLVED
Donor fishing vessel 4		Vessel had gaps on AIS and on , so all activities and catch areas cannot be confirmed.	Request VMS data for fishing trip ( ) to confirm vessel activities and catch areas.  RESOLVED

<sup>\*</sup> This donor purse seine fishing vessel was named by an NGO in a list of reported cases of deaths at sea. Further review and documentation demonstrated that the death was due to natural causes and not the result of an accident or foul play. Therefore, the risk was considered resolved.

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