

SEAPAC-Kingfisher AREP analysis summary

Area of interest (AOI):	Pacific Ocean
Analysis period:	01Jan2024 – 31Dec2024
Positional sources:	AIS
Submitted to:	SEAPAC-Kingfisher Holdings Ltd.
Date submitted:	10 th January 2025
Report number:	25-004
Report compiled by:	Intelligence & Compliance (I&C) Team
Quality control by:	Senior I&C Team

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 This disclaimer is superseded by any contract OceanMind Limited already has with the receiving party.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 © 2025 Spire, © 2025 Orbcomm, © 2025 Maxar Technologies Ltd, © 2025 IHS Global Ltd, © 2025 Flanders Marine Institute, © 2025 Copernicus Sentinel data and © 2025 OceanMind Limited. In all instances, all rights are reserved.

COMMERCIAL IN CONFIDENCE

Page 1

© 2025 OceanMind Limited. All Rights Reserved.

Vessel Activity Summary

Between 01 January and 31 December 2024, OceanMind carried out analysis for independent validation of the legality and risk assessment of the AREP risk analyses delivered to SEAPAC-Kingfisher Holdings Ltd.

All risks in the analysis report have been resolved and are considered closed.

Analyses were conducted on an ad-hoc basis 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. For this, both fisheries and labour risks were reviewed and – where required – reported on.

For this risk assessment, OceanMind analysed AIS transmissions from two fish carriers transporting frozen tuna caught by purse seine fishing vessels in the Western Pacific. The activities were then reviewed for consistency with the vessel's documentation and cross referenced against a labour vessels of interest list. This list consists of publicly available information about vessels that have been accused of involvement in labour abuses. Where appropriate, OceanMind supported further investigations of the vessel, including reviewing vessel logbooks, emails, hatch temperature logbook / hatch plan, master interview, transshipment 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 fishing risks.

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

Table 1 - Risk identified for carrier between 01Jan2024 – 31Dec2024.

Risk category	Risk description	Monitoring summary
Possible transhipment	<p>The vessel showed slow speeds and behaviour that indicates possible at-sea transhipments.</p> <p>Recommended to confirm with logbooks, master interview, transhipment declarations, and stowage plan and resulted in the resolution of this risk.</p>	<p>Events identified – 4</p> <p>Vessels involved - 1</p>
Unreported port call	<p>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.</p> <p>Recommended to confirm with logbooks, master interview, port declarations, transhipment declarations, and hatch temperatures.</p>	<p>Events identified - 1</p> <p>Vessels involved - 1</p>

Table 2 - Risks identified for donor vessels between 01Jan2024 – 31Dec2024.

Risk category	Risk description	Monitoring summary
AIS outage	<p>The vessel had an AIS outage during the fishing trip period. This event could enable unreported fishing activities and catch areas cannot be confirmed.</p> <p>Recommended to confirm catch areas where the vessel operated inside the unreported EEZ. Actions following this recommendation resulted in the resolution of this risk.</p>	<p>Events identified - 3</p> <p>Vessels involved - 3</p>

Carrier consignments

A total of 2 consignments were analysed. The shipments were of tuna caught by purse seine fishing vessels in the Western Pacific Ocean. A summary of the carrier consignments is described below in Table 3. **All risks have been resolved and are considered closed.**

Table 3 - Carrier consignment: summary of activity

Carrier vessel	Key risk description	Recommended checks for DOF	DOF Inspection results	Recommended checks for SEAPAC
Carrier 1	No risks identified	None	None	None
Carrier 2	Key risk A: The carrier displayed slow speeds for over 45 mins on [REDACTED] between [REDACTED] - [REDACTED] inside [REDACTED] EEZ. No other vessels were observed on AIS in proximity.	Confirm the reason for the slow speeds and that no unauthorized or unlicensed at-sea transhipments took place during this period. Logbooks Hatch temperature logbooks Storage Plan Emails Master Interview Transhipment declarations Receipts Supply lists	The carrier met with FV [REDACTED] on the [REDACTED] to transfer crew. These points were proved by checking logbooks, emails, delivery voucher and an interview with the master on board. <u>Resolved</u>	None
	Key risk B: The carrier displayed slow speeds for over 5 hours on [REDACTED] between [REDACTED] - [REDACTED] inside [REDACTED] EEZ. No other vessels were observed on AIS in proximity	Confirm the reason for the slow speeds and that no unauthorized or unlicensed at-sea transhipments took place during this period. Logbooks Hatch temperature logbooks	The carrier met with FV [REDACTED] and FV [REDACTED] on the [REDACTED] to transfer provisions and spare parts.	None

		Storage Plan Emails Master Interview Transshipment declarations Receipts Supply lists	These points were proved by checking logbooks, emails, delivery voucher and an interview with the master on board. <u>Resolved</u>	
	Key risk C: The carrier displayed slow speed for 5 hours on [REDACTED] between [REDACTED] - [REDACTED] inside [REDACTED] EEZ. No other vessels were observed on AIS in proximity.	Confirm the reason for the slow speeds and that no unauthorized or unlicensed at-sea transshipments took place during this period. Logbooks Hatch temperature logbooks Storage Plan Emails Master Interview Transshipment declarations Receipts Supply lists	The carrier met with FV [REDACTED] and FV [REDACTED] on the [REDACTED] to transfer provisions and spare parts. These points were proved by checking logbooks, emails, delivery voucher and an interview with the master on board. <u>Resolved</u>	None
	Key risk D: The carrier displayed slow speeds and anchored for 4 days and 15 hours between [REDACTED] - [REDACTED] inside [REDACTED] EEZ. No other vessels were observed on AIS in proximity.	Confirm the reason for the slow speeds and that no unauthorized or unlicensed at-sea transshipments took place during this period. Logbooks Hatch temperature logbooks Storage Plan Emails Master Interview Transshipment declarations Receipts Supply lists	The carrier has anchored inside [REDACTED]. This was proved by checking logbooks, emails and an interview with the master on board. <u>Resolved</u>	None

Donor vessels

A total of 3 donor vessels were analysed. All tuna was caught by purse seine fishing vessels in the Western Pacific Ocean. A summary of the donor vessels is 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
Carrier 1	Donor Fishing Vessel 1		-		Vessel had a gap on AIS between - , so all activities and catch areas cannot be confirmed.	Catch area confirmed as . SEAPAC-Kingfisher also submitted EU Catch Certificate confirming activities. Resolved
Carrier 2	Donor Fishing Vessel 1		-		Vessel had a gap on AIS between - , so all activities and catch areas cannot be confirmed.	Catch area confirmed as . SEAPAC-Kingfisher also submitted EU Catch Certificate confirming activities Resolved
	Donor Fishing Vessel 2		-		Vessel had a gap on AIS between - , and - , so all activities and catch areas cannot be confirmed.	Catch area confirmed as . SEAPAC-Kingfisher also submitted EU Catch Certificate confirming activities Resolved