



## SEAPAC-Kingfisher AREP analysis summary

|                                |                                      |
|--------------------------------|--------------------------------------|
| <b>Area of interest (AOI):</b> | Pacific Ocean                        |
| <b>Analysis period:</b>        | 01Jan2025 – 31Dec2025                |
| <b>Positional sources:</b>     | AIS                                  |
| <b>Submitted to:</b>           | SEAPAC-Kingfisher Holdings Ltd.      |
| <b>Date submitted:</b>         | 06 <sup>th</sup> January 2026        |
| <b>Report number:</b>          | 26-001                               |
| <b>Report compiled by:</b>     | Intelligence & Compliance (I&C) Team |
| <b>Quality control by:</b>     | Senior I&C Team                      |

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## Vessel Activity Summary

Between 01 January and 31 December 2025, 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 vessel 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 4 donor vessels risk categories explained in Table 2 below.

*Table 1 - Risk identified for carrier between 01Jan2025 – 31Dec2025.*

| Risk category          | Risk description   | Monitoring summary                                       |
|------------------------|--|--|
| Possible transshipment | <p>The vessel showed slow speeds and behaviour that indicates possible at-sea transshipments.</p> <p>Recommended to confirm with logbooks, master interview, transshipment declarations, and stowage plan and resulted in the resolution of this risk.</p> | <p>Events identified – 4</p> <p>Vessels involved - 2</p> |

*Table 2 - Risks identified for donor vessels between 01Jan2025 – 31Dec2025.*

| 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 - 5</p> <p>Vessels involved - 4</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      | <p><b>Key risk A:</b><br/>The carrier displayed slow speeds on [REDACTED] for 2 day 16.5 hrs between [REDACTED] - [REDACTED].<br/>No other vessels were seen in proximity on AIS.</p>   | <p>Confirm the reason for the slow speeds and that no unlicensed or unauthorized transhipments took place. If transfer of supply took place, confirm this with supply lists for quantity needed and receipts of purchase.</p> <p>Logbooks<br/>Hatch temperature logbooks<br/>Stowage Plan<br/>Emails<br/>Master Interview<br/>Transhipment declarations<br/>Receipts and Supply lists<br/>Crew list</p> | <p>Carried out drifting inspections from company.</p> <p>These points were proved by checking logbooks, emails, stowage plan, crew list and an interview with the master on board.</p> <p><b>Resolved</b></p> | None                          |
|                | <p><b>Key risk B:</b><br/>The carrier displayed slow speeds 2 events on [REDACTED]:</p> <ul style="list-style-type: none"> <li>• for 1 day between [REDACTED] - [REDACTED].</li> <li>• for 21.5 hours between [REDACTED] - [REDACTED].</li> </ul> | <p>Confirm the reason for the slow speeds and that no unlicensed or unauthorized transhipments took place. If transfer of supply took place, confirm this with supply lists for quantity needed and receipts of purchase.</p>   | <p>Carried out drifting inspections from company.</p> <p>These points were proved by checking logbooks, emails, stowage plan, crew</p>  | None                          |



|                  |   |   |   |             |
|------------------|---|---|---|-------------|
|                  | <p>[REDACTED] –<br/>No other vessels were seen in proximity on AIS.</p>   | <p>Logbooks<br/>Hatch temperature logbooks<br/>Stowage Plan<br/>Emails<br/>Master Interview<br/>Transshipment declarations<br/>Receipts and Supply lists</p>  | <p>list and an interview with the master on board.<br/><br/><b>Resolved</b></p>   |             |
|                  | <p><b>Key risk C:</b><br/>The carrier displayed slow speeds inside [REDACTED] EEZ for 6 hrs. between [REDACTED] – [REDACTED].<br/>No other vessels were seen in proximity on AIS.</p> | <p>Confirm the reason for the slow speeds and that no unlicensed or unauthorized transshipments took place. If transfer of supply took place, confirm this with supply lists for quantity needed and receipts of purchase.<br/><br/>Logbooks<br/>Hatch temperature logbooks<br/>Stowage Plan<br/>Emails<br/>Master Interview<br/>Transshipment declarations<br/>Receipts and Supply lists</p> | <p>Carried out drifting inspections from company.<br/><br/>These points were proved by checking logbooks, emails, stowage plan, crew list and an interview with the master on board.<br/><br/><b>Resolved</b></p> | <p>None</p> |
| <p>Carrier 2</p> | <p><b>Key risk A:</b><br/>The carrier displayed slow speeds inside the [REDACTED] EEZ for 21 hrs between [REDACTED] – [REDACTED], where it met with [REDACTED] vessel [REDACTED].</p> | <p>Confirm the reason for the vessel meeting and that no unlicensed or unauthorized transshipments took place. If transfer of supply took place, confirm this with supply lists for quantity needed and receipts of purchase.<br/><br/>Logbooks<br/>Hatch temperature logbooks<br/>Stowage Plan</p>   | <p>Carried out drifting inspections from company.<br/><br/>These points were proved by checking logbooks, emails, stowage plan, crew list and an interview with the master on board.<br/><br/><b>Resolved</b></p> | <p>None</p> |

|  |  |  |  |  |
|--|--|--|--|--|
|  |  | Emails<br>Master Interview<br>Transshipment declarations<br>Receipts and Supply lists<br>Crew list |  |  |
|--|--|--|--|--|

## Donor vessels

A total of 4 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 | Trip 1:<br>[REDACTED]<br><br>Trip 2:<br>[REDACTED] | -                           | Trip 1:<br>[REDACTED]<br><br>Trip 2:<br>[REDACTED] | Trip 1:<br>Vessel had a gap on AIS between [REDACTED] – [REDACTED], so all activities and catch areas cannot be confirmed.<br><br>Trip 2:<br>Vessel had a gap on AIS between [REDACTED] – [REDACTED], so all activities and catch areas cannot be confirmed. | Catch areas confirmed:<br>Trip 1:<br>[REDACTED]<br><br>Trip 2:<br>[REDACTED]<br><br>SEAPAC-Kingfisher also submitted EU Catch Certificate confirming activities.<br><b>Resolved</b> |



|           |                        |  |            |            |   |   |
|-----------|------------------------|--|------------|------------|---|---|
|           | Donor Fishing Vessel 2 | Nauru EEZ<br>Marshall Islands EEZ<br>Kiribati EEZ<br>FSM EEZ | -          | [REDACTED] | Vessel had a gap on AIS between [REDACTED] – [REDACTED], so all activities and catch areas cannot be confirmed.   | Catch area confirmed as:<br>[REDACTED]<br><br>SEAPAC-Kingfisher also submitted EU Catch Certificate confirming activities.<br><b>Resolved</b> |
| Carrier 2 | Donor Fishing Vessel 1 | [REDACTED]<br>[REDACTED]                                     | [REDACTED] | -          | Vessel had multiple gaps on AIS between [REDACTED] – [REDACTED], [REDACTED] – [REDACTED], and [REDACTED] – [REDACTED], so all activities and catch areas cannot be confirmed. | Catch areas confirmed:<br>[REDACTED]<br><br>SEAPAC-Kingfisher also submitted EU Catch Certificate confirming activities.<br><b>Resolved</b>   |
|           | Donor Fishing Vessel 2 | [REDACTED]   | -          | -          | Vessel had a gap on AIS between [REDACTED] – [REDACTED], so all activities and catch areas cannot be confirmed.   | Catch area confirmed:<br>[REDACTED]<br><br>SEAPAC-Kingfisher also submitted EU Catch Certificate confirming activities.<br><b>Resolved</b>    |