

CC-05-INFO-01

5th Compliance Committee of the Southern Indian Ocean Fisheries Agreement
(CC5)

IUU Vessel Cross-listing procedure note

Relates to agenda item: 5.2

Working paper Info paper

SIOFA Secretariat

Abstract

Involved in an inter-RFMOs discussion process on Cross listing, the Secretariat would like to bring to the attention of the Compliance Committee Chairperson and to the MoP8 some weaknesses of the special Cross-listing procedure and to suggest some proposals.

Recommendations

The Secretariat would like to suggest that the MoP8 reviews Circular 2018-06 to clarify the distinction between the SIOFA IUU-Vessel list and a separate IUU-vessels cross-list to be updated by the Secretariat upon receipt of IUU lists from others RFMOs.

The Secretariat would like to seek approval from the MoP to work with other RFMOs on a standardised template, combined with a simple process to provide real-time updates of the IUU list.

Background:

In line with the remarks made at MoP7 and with careful reference to the Conservation Measures 2018-06, the Secretariat would first like to recall the existing special procedure for cross-listing IUU vessels from other organisations in paragraphs 24 and 27.

Following transmissions from other RFMOs to SIOFA of their respective IUU vessel-lists and updates, the Secretariat incorporates these vessels into its cross-list. Conversely, when its list is modified, the SIOFA Secretariat is then required to inform the other RFMOs of its IUU vessels list.

However, there are several problems with this kind of listing. Firstly, it is important to note that not all RFMOs inform delisted IUU vessels in the same way. Therefore, some information may be contradictory between RFMOs, creating confusion which sometimes are very time consuming to solve. In addition, the original referencing RFMO is not always available within the other RFMO cross list of IUU vessels.

An example of these confusions could be the case of the FV NEFELIN. The Secretariat realised that the FV NEFELIN have been maintained on the IOTC and ICCAT list in 2020 as IUU vessel with SIOFA being the originating RFMO of the registration whereas SIOFA registered the NEFELIN from GFMC (in 2018) and remove it from the cross-list when it has been removed from the GFMC list (in 2019).

Confusion over the origins of the IUU registration can lead to cases such as that of the OKAPI MARTA, listed by SIOFA as a IUU vessel (GFMC-IOTC) and listed by IOTC as a vessel originally listed by SIOFA, and listed by ICCAT as a vessel originally listed by IOTC. This vessel has disappeared from the GFMC list where it has apparently been replaced by the SUMMER REFER.

Finally, given the large number of RFMOs, the changing name capacity of the IUU vessels and the number of ships to be reported, the risk of data cross-referencing errors quickly becomes considerable. We also note the lack of updating of vessel name changes between RFMOs which is another parameter to be considered when cross-referencing information in the cross-list.

All these issues generate a considerable additional workload for the Secretariat which must check all RFMOs new cross-listing notifications and that do not guarantee any accuracy. Also, some errors may occur and still require regular corrections as we have done for the 2021-13 circular. The workload generated by this procedure is considerable for a small Secretariat, on top of that, it has poor result.

The support of a Compliance & VMS Manager (MoP-08-INFO-02) would be a precious help, in managing the IUU vessels list.

Recommendations:

Several approaches are possible. In a more pragmatic measure, the Secretariat would like to suggest the CCPs to consider amending CMM 2018-06. These amendments could clarify that a distinction is necessary between the SIOFA IUU-vessels list (to be transmitted to other RFMOs once updated) and the other RFMOs cross-list. Both the SIOFA IUU-Vessel list and the Cross list of IUU Vessels would be transmitted to the other RFMOs after the annual Meeting of the Parties. They could be transmitted in a single document with two separate tables. The SIOFA IUU Vessels would be mentioned in those two tables.

The procedure for listing, de-listing and updating information on vessels on the SIOFA list would not be changed and would follow the well-established procedures in CMM2018-06.

Furthermore, the Secretariat would like to raise the importance of highlighting the last updates for the other RFMOs after revision. The changes in the months between the last two Meetings of the Parties could be pointed out with a legend. Therefore, the Secretariat recommends the MoP to highlight them with an agreed font style by type (Delisting, Change of vessel name, correction of previously erroneous information, etc.).

The Secretariat also believes in a more inclusive, standardised, and collaborative approach for all RFMOs that could significantly reduce these cross-checking errors.

Therefore, the Secretariat invites the CCPs to consider the participation of the Secretary to the discussion of the IUU vessels Crossed-list procedure with other RFMOs Secretaries. These discussions, in addition to solving cross-listing-errors, may lead to interesting propositions.

For instance, it could be the opportunity to define a system which would not only facilitate the work of the inspectors but would also optimise the standardisation and visibility of the updates made, leading to the strengthening of the interregional cooperation of RFMOs.