

# ARE RFMO IUU VESSEL LISTS USEFUL?

A USER EVALUATION OF THE COMBINED IUU VESSEL LIST



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## INTRODUCTION

Currently there are thirteen Regional Fisheries Management Organisations (RFMOs) and related organisations that have instituted a process for officially listing vessels that have been identified as taking part in illegal, unreported, or unregulated (IUU) fishing activities relating to their area or species of competence. These are commonly known as IUU lists. The process for IUU listing a vessel varies between RFMOs but is generally quite complicated and applies only to vessels that have violated the management measures of the RFMO. As a result, generally only a few vessels are added or taken off RFMO lists each year, and the lists therefore do not represent the true number of vessels who commit illegal fishing operations.

Nonetheless, IUU listings by RFMOs form a very important part of the global fisheries enforcement picture, not least because they are one of the few transparent sources of information on sanctioned IUU vessels. The listed fishing vessels can also often be considered the ‘worst of the worst’, presenting the highest risk to potential coastal, flag, port, and market States, and so easily available and up to date information on their identities and operations is critical.

As such, they form a crucial information source for many stakeholders in the fisheries space – not just enforcement personnel but also for those involved in vessel service provision, researchers, non-governmental actors and many more. Making this information as easily accessible, as up to date, and as useful as possible was TMT’s objective when we first launched the public service Combined IUU List website in 2012. A relaunch with enhanced features and information in 2018 allows us now in 2021 to now look at three years’ worth of site traffic, giving insights into who is using the site, where they are based, and how they are using the information in their work. With over 30,000 users from nearly every country in the world across a very broad stakeholder group, the findings clearly demonstrate that beyond the RFMO processes, the IUU lists are a globally significant tool that can be used effectively to combat IUU fishing operations.

## BACKGROUND

### What is the Combined IUU List?

The Combined IUU List is a website maintained by TMT as a public service. It contains all fishing vessels currently or historically IUU listed by a Regional Fisheries Management Organisation (RFMO). It enables users to access IUU listing information from all RFMOs on a single, easily searchable website. It can be accessed at [www.iuu-vessels.org](http://www.iuu-vessels.org).

### Why does the Combined IUU List exist?

The Combined IUU List was initially launched by TMT in 2012, and then relaunched with new features and format in 2018, to address a particular information gap that was identified by the international community. RFMOs were IUU listing vessels, but these vessels were then ‘disappearing’ because of name and flag changes, changes in location and fishing grounds, and even through structural modifications altering their appearance. The original aim of the RFMO IUU listings - to prevent these vessels from continuing their illegal activities - was being undermined by the lack of a focussed effort to keep track of their changing identities and operations, and a platform to make this information publicly available.

Consolidating all the RFMO lists into one location also aimed to simplify the job of any end user who needed to consult these lists as part of their day to day work – rather than having to go one by one to each of the RFMO IUU lists and manually search them, the Combined IUU List allows any user to search by any common vessel identifier (past or present) and filter information for example by RFMO or if the vessel is currently or was historically listed.

### How is the information in the Combined IUU List populated?

The process that informs the details of each individual vessel on the Combined IUU List is based on TMT’s bespoke fisheries analytical system FACT. This system and our analytical team integrate and match thousands of data sources (databases, RFMOs, national governments, positional sources, our own field reports, port records, photographs etc.), with the objective of achieving an up-to-date operational overview - vessels, companies, fishing activities, IUU risk profiles etc. - of global industrial fisheries.

The process is being applied to tens of thousands of vessels in FACT, with IUU listed vessels having the additional data layer of their RFMO IUU listing. Whenever an RFMO updates their IUU list, the relevant details are also updated in FACT, which then populates the Combined IUU List website. Equally whenever another information source shows a relevant vessel change, for example a flag hop or a vessel sighting, this information is also updated in FACT and then the Combined IUU List.

TMT makes every effort to ensure that information contained on the Combined IUU List is correct and up to date. The decision on whether to include information is based on the reliability of the source, and verification against other information sources, including photos and documents where possible. However, while TMT strives to ensure that all information on the site is correct, this cannot be guaranteed. If a user believes that any information contained on this site is incorrect, or has have additional/updated information to share, we ask them to contact TMT so that the site can be updated.

## Case study: Keeping track of an IUU listed fishing vessel

The vessel originally IUU listed under the name RAY provides a good example of both the challenge of keeping up with changing identities, but also the value of its IUU listing to enforcement personnel in taking action to deny port entry, a market for its catch, and logistical support for its operations.

**The vessel was IUU listed in 2012 by SEAFO (following a previous listing by CCAMLR in 2006). The vessel has subsequently:**

- 1) Changed name at least 4 times - from RAY, to YELE, to HAI LUNG, to current JINZHANG
- 2) Jumped call sign and flag at least 3 times
- 3) Changed hull colour at least 3 times
- 4) Rarely transmitted on AIS but when it did it shared the MMSI with another vessel, providing a very unclear picture of location

TMT identified the vessel may be in the West Africa region in early 2016 and alerted regional States. The vessel was identified in Togo in July 2016 by TMT staff working with the Togolese authorities. The vessel was inspected and based on its IUU listing denied port entry and requested to leave national waters. The vessel subsequently attempted to enter port in Cote d'Ivoire, Nigeria and Liberia, where it was detained in the latter two countries inspected, and then also denied port entry. The Togolese, Nigerian and Liberian inspections provided updated vessel identity and flag data that was not available in any other known data source, thereby providing new information into the Combined IUU List. The vessel subsequently arrived in Freetown in late 2018 under the name JINZHANG and claiming an Equatorial Guinea flag, where it is being monitored by TMT but has remained at anchor and inactive to the current date.



The IUU listed vessel originally listed as RAY, under the name YELE (Sierra Leone flag and green hull) in Togo in 2016, and then the under the name JINZHANG (Equatorial Guinea and blue hull) in Sierra Leone in 2019.



## Combined IUU List user analysis

Using a combination of web analytics, a review of user requests and IUU list downloads, and a stakeholder survey, TMT conducted an analysis of the Combined IUU List website for the 3-year period April 2018 to April 2021. The objective was to better understand how often the site is being accessed, who is using the information, where are they from, what sector do they represent, and why they are using the information.

### How often is the Combined IUU list being accessed?

- 1) The Combined IUU list was accessed by **30,044** individual users at an average of **834** per month or **27** per day
- 2) There were a total of **290,039** page views at an average of **8,056** per month or **264** per day
- 3) Users were accessing on average **4.35** pages per session, indicating active use of search functionality
- 4) Average session is **4 MINUTES 51 SECONDS**, indicating high engagement by the website users

### Who is accessing the website?

Based on website enquiries and the stakeholder survey, the following stakeholders were identified as regular users of the Combined IUU List:

- 1) Government Agencies including from Fisheries, Port Authorities, Navy, Coast Guard, Customs, Maritime Authorities
- 2) Inter-governmental organisations including UNODC, Interpol and FAO
- 3) Service providers including from insurance, bunkering, transport, and cold store companies
- 4) Seafood import and sale, processing, and food manufacturing companies
- 5) Universities and Research Institutes
- 6) Non-governmental organisations
- 7) Media
- 8) Legal representatives
- 9) Fish catching companies






### What are they accessing it for?

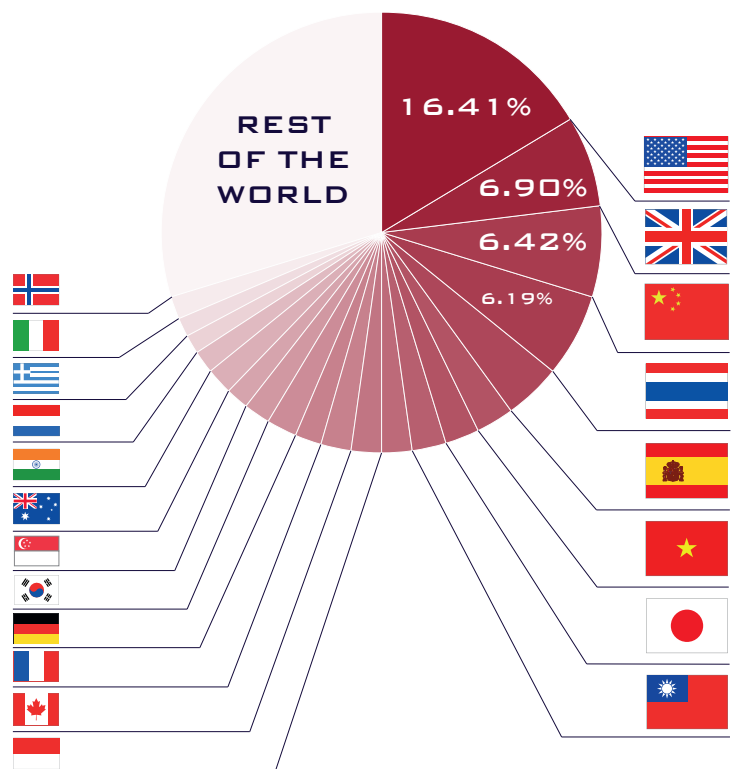
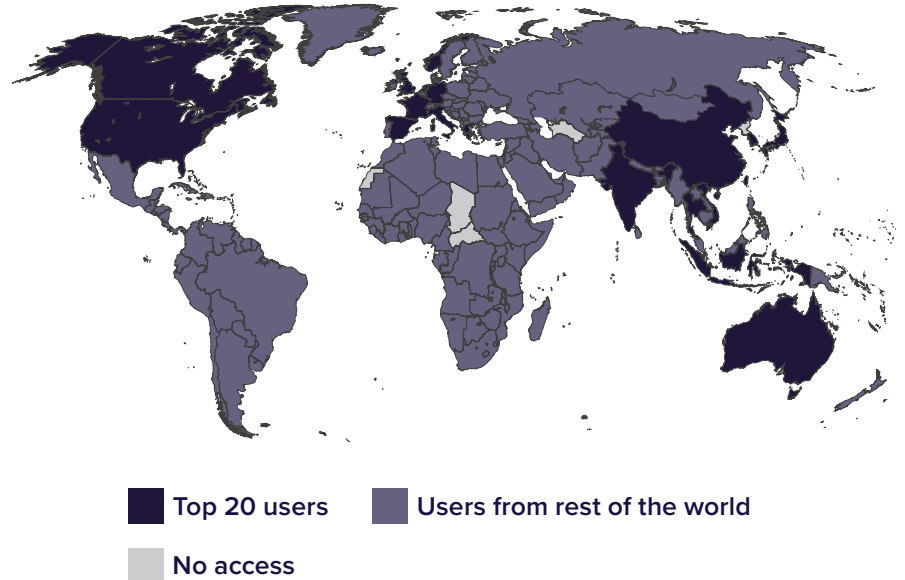
Respondents from national and inter-governmental agencies, service providers, and seafood companies all identified that they used the Combined IUU List as a tool to check compliance histories of vessels to ensure that they were not fishing in their waters, entering the ports, being provided their services, or allowing their catch to enter supply chains. Those from research, NGO, legal and media groups identified that they used the Combined IUU List to conduct research into IUU vessels and operations, and to inform their broader work. Fishing companies noted use of the site as part of their due diligence on vessel purchase particularly.

## Where are they accessing it from?

Combined IUU List users come from just about every country in the world.

The top 20 countries where access was made from are:

	USA	16.41%
	UK	6.90%
	China	6.42%
	Thailand	6.19%
	Spain	4.22%
	Vietnam	2.74%
	Japan	2.55%
	Taiwan	2.36%
	Indonesia	2.32%
	Canada	2.24%
	France	2.18%
	Germany	2.12%
	South Korea	2.08%
	Singapore	1.88%
	Australia	1.84%
	India	1.80%
	Netherlands	1.71%
	Greece	1.46%
	Italy	1.45%
	Norway	1.45%



It is very interesting and positive to note that the top 20 user countries represent a cross section of many of the major distant water fishing, port, market and processing States.

## How are they accessing it?

Users find the Combined IUU Vessel website via:

- 46% organic search
- 45% direct to URL
- 9% referral from other websites

Users access the Combined IUU List using:

- 87.1% desktop (increase over 3 years 1,356%)
- 11.5% mobile (increase over 3 years 2,602%)
- 1.4% tablet / tablet (increase over 3 years 4,778%)

The information in the Combined IUU List is not only made available through the website. In the interest of maximising reach, TMT has developed partnerships and data sharing agreements to integrate and share the information into other platforms. This includes IHS Markit, who are responsible for the IMO number management and host the largest global vessel database in the world; as of 2020 users of their Sea-Web database have access to the data from the Combined IUU List. Another example is the Pacific Islands Fisheries Forum Agency, who through an API are integrating the data directly into their world-class regional fisheries monitoring system. In this way the reach and availability of the Combined IUU list data is even greater. Stakeholders with an interest in partnering this way can contact TMT.

## Is the combined IUU list a list of all fishing vessels involved in IUU Fishing?

No. The Combined IUU List contains vessels that are currently or have in the past been IUU listed by an RFMO. This represents only a small number of the vessels that are known to have engaged in IUU fishing globally.

Reasons why an IUU vessel might not be included on an RFMO IUU list include:

- 1) the vessel was convicted of IUU fishing and paid its penalty, to the satisfaction of the State concerned
- 2) the vessel was engaged in a fishery not included in the remit of any RFMO, for example in the waters of a coastal State
- 3) the vessel was proposed for listing in an RFMO that makes listing decisions on the basis of consensus, and members did not achieve consensus to list the vessel
- 4) the IUU fishing was not detected or could not be proven to the satisfaction of the relevant authorities

TMT is also monitoring compliance histories of fishing vessels that are not IUU listed, which are recorded in FACT. These are not made publicly available, but TMT can be contacted at [info@tm-tracking.org](mailto:info@tm-tracking.org) with a request for information. Please note however that there may be limits on what information can be shared based on source and partnerships.



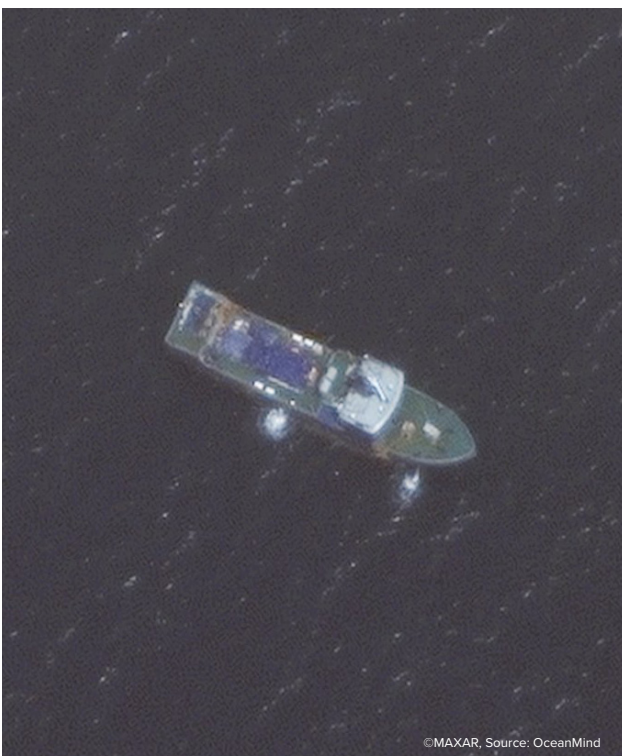
## What are the IUU listed vessels most commonly searched?

While all vessel pages have been accessed in the three-year period, the top three vessels that have been searched on the Combined IUU List in the three year period are:



### VLADIVOSTOK 2000

The fishing vessel currently known as the VLADIVOSTOK 2000 has been through several identities and flags, most famously LAFAYETTE and DAMANZAIHAO (its IUU Listing name). One of the largest fishing vessels in the world, ownership has passed through Greek, Russian, Peruvian/Chinese, Singapore and shell companies. SPRFMO included this vessel in their 2015 IUU list for prolonged presence in the SPRFMO Area without authorisation and providing support to five authorised Peruvian trawlers. Since the listing the vessel has been linked to several other IUU operations, including unlicensed fishing in the Peru EEZ and illegal transshipment at sea. SPRFMO delisted this vessel on 14 February 2020 following ownership change. The vessel renamed to VLADIVOSTOK 2000 and later gained authorisation to fish Mackerel and Sardines in the NPFC Convention area for the duration of 2019 and 2020.



### COBIJA

The vessel was added to the SEAFO IUU list in 2017. Since then, it is suspected to have conducted illegal fishing for toothfish in the CCAMLR area. In June 2020 the vessel was boarded on the high seas in the Indian Ocean by an Australian Border Force patrol vessel. Bolivian registration documents were provided that were confirmed to be fraudulent, indicating that the vessel was stateless; previous Bolivia registration had expired on the 30 January 2019. The patrol identified both fishing gear and catch on board. Vessel reported detained in Yemen with INTERPOL support on 9 October 2020. Toothfish onboard, with reported effort to offload this catch.



## STS-50

This vessel is a former longliner, sources indicate that it may have been reconfigured for use as a fish carrier. It was IUU listed by CCAMLR for attempting to offload illegally caught toothfish in China. The vessel was deregistered by Togo in April 2017 but was reported to continue claiming a Togolese flag after that date. In early 2018 the vessel was detained in Maputo, Mozambique and then absconded. After a much reported chase across the Indian Ocean, it was apprehended by Indonesia in early April 2018.

## What next for the Combined IUU List?

TMT will continue to maintain the Combined IUU List as a globally accessible tool. We will continue to strive to present up to date information on the listed vessels, and to work with all stakeholders, including the RFMOs themselves, towards achieving this objective. We will also continue to evolve the website so that it is as useful as possible to users. In the process of engaging with stakeholders for the purposes of collecting information for this brief, we also took the opportunity to get their feedback on suggested website improvements. These included the ability to download a vessel page as a pdf report, and email alerts when a new vessel has been added to the list (or a previous one delisted), and when information on a vessel is updated. These have been added to our broader systems development plan for rollout as soon as possible.

The operators behind IUU listed vessels continue to use ever more sophisticated ways to hide their illegal activities and increasingly the identities, locations and operations of the vessels are obscure. Only two vessels on the Combined IUU List are (occasionally) tracking on AIS, very few of the vessels have IMO numbers, and for many even the flag State is unconfirmed. It requires a global community to ensure that these vessels are identified, and denied access to fishing grounds, ports, markets, and services. As such we are grateful for any and all information that can be shared on any IUU listed, or indeed any other vessel identified as taking part in IUU fishing activities, to assist all our efforts to combat this global challenge.

We strongly encourage the Contracting Member States of all RFMOs to continue to actively pursue IUU vessel listings. We further encourage RFMOs to make their IUU vessel lists as accessible to all stakeholders as possible, including making the data available in a machine-readable format. All stakeholders are encouraged to contact TMT with any questions, suggestions for improvements to the Combined IUU List, and opportunities for cooperation.

For more information, for enquiries, or to share information on an IUU listed vessel please contact [info@tm-tracking.org](mailto:info@tm-tracking.org)  
The Combined IUU List [www.iuu-vessels.org](http://www.iuu-vessels.org)  
Trygg Mat Tracking [www.tm-tracking.org](http://www.tm-tracking.org)