

In Respond to CCSBT-CC/1910/Info01 Submitted by PEW on Analysis of AIS Indicates Possible At-Sea Transfers of Southern Bluefin Tuna went Unreported in 2017

Taiwan recognize the importance of combating IUU fishing, and have committed ourselves to a zero-tolerance policy to IUU fishing. Therefore, we appreciate PEW's effort on composing this report on utilizing AIS data for detecting potential unreported transshipment of SBT.

However, with regard to the data source of this report. AIS is originally design for collision avoidance for water transport. Although it can provide information such as unique identification and vessel position, AIS has no mechanism to prevent tampering, with limited transmission range, and cannot be reliably received by satellite. Therefore, the security and reliability of such data are at best questionable. For this reason, the main method for vessel monitoring is still heavily relies on VMS, AIS can only be taken as a supplement information. Thus, it is inappropriate to determine potential IUU fishing activity solely with AIS data.

Regarding the 3rd paragraph on page 2, the report states that there were 89 encounters detected by AIS between Taiwanese-flagged LSTLVs and carriers. However, since all the at sea transshipment made by Taiwanese-flagged LSTLVs were covered by the IOTC Regional Observer Program, and every Taiwanese-flagged carrier operate in the Indian ocean are obligate to have an IOTC ROP observer onboard, any unauthorized or unreported transshipment is unlikely to happen. Yet, based on our investigation, those potential encounters may be caused by transferring baits or general supply.

To conclude, for achieving our common goal of fighting IUU fishing activity, we would like to ask any non-governmental organization to consult with members during the composition of the report when their fleet has been mentioned, we may be able to resolve misunderstanding beforehand, reduce the information gap between the public sector and NGOs and increase the quality and reliability of such report. We believe that this is a more constructive approach toward eliminating IUU fishing activity.