

In Respond to CCSBT-CC/1910/14(a) & 14(b) Submitted by TMT on Southern Bluefin Tuna IUU Risk Assessment: A Pilot Study Conducted for CCSBT

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

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.

Take fishing vessel Hung Chuan No.232 for example, the report pointed out that AIS cannot track Hung Chuan No.232 between 25th March and 19th July and suggest that such vessel may have unreported port call or transshipment (CCSBT-CC/1910/14(b) p.29), our official record states otherwise. Hung Chuan No.232 conduct at sea transship on 7th April and 7th October and landing on 10th July and 28th December at Cape Town. This instance clearly shows the limits of AIS base tracking.

Other than that, we believe that some speculation in this paper lacks proper foundation and the submitter may lack the appropriate information to verify their claims, which leads to some statement in this report is wildly different from the fact. For example, fishing vessels Sheng Fan No.126 and Sheng Fan No.699 been suspect to operate in area of interest 35 and 36 during November and December 2017 without authorization (CCSBT-CC/1910/14(b) p.42). However, based on the official record from the Fisheries Agency of Taiwan, both vessels mentioned were authorized to operate in IOTC area.

One more example of unfounded speculation is fishing vessels Feng Kuo No.888 and Feng Kuo No.669 mentioned in the report for operate in the CCSBT area before been authorized by Taiwanese government. However, based on the official record from the Fisheries Agency of Taiwan, Feng Kuo No.888 and Feng Kuo No.669 were authorized to operate in the IOTC area for entire 2017.

Lastly, according to AIS Analysis Project Proposal (CCSBT-CC/1810/23) adopted last year, the objective of this project states as below:

The overall objective of the proposed analysis is to improve the Commission for the Conservation of Southern Bluefin Tuna`s (CCSBT`s) understanding of the risk of IUU fishing occurring in the Southern Bluefin Tuna (SBT) fishery, and where possible identify the distribution, identities and activities of vessels and fleets that may be engaged in IUU fishing of the stock. This will further enable CCSBT and Member States to better understand the potential impact of IUU on the SBT stock and identify steps to address IUU fishing of the species.

Nonetheless, we've noticed that some part of this report goes beyond the proposed objective to cover some at sea labor and occupational safety issue. We believe that it is inappropriate to include something that is not mentioned in the proposal into the submitted report. Based on this point, we have to express our concern to the methodology and result of this study and strongly against the accusations based on false information from the internet.

For instance, the report accuses Taiwanese vessel Fu Mao No.268 was fined and revoked its fishing license for underpay foreign crew. However, according to our investigation, that vessel was fined for 250,000 NTD and its fishing license was revoked for 2 months due to unauthorized employment of foreign crew, not due to underpaying. Another example is regarding TMT accuses two crew members of Taiwanese vessel Yun Mao No.168 passed away in 2017 due to toothache and being refused evacuation, and another death happened in 2019. Our investigation suggests that the cause of death happened in 2017 was pneumonia. Another death happened in 2018 instead of 2019, the cause of death was biliary peritonitis.

To conclude, we believe that these papers contain many misleading information and false accusation as mentioned above. We would like to ask the submitter, which was tasked by this Commission to conduct the study, to fulfill its obligation of verification by consulting with members mentioned in their report and truly reflect their comment before submitting your study result to the Secretariat. We deem that this is a more constructive and effective way to achieve our common goal of fighting IUU fishing activity. Thus, we request these two papers(CCSBT-CC/1910/14(a) & 14(b)) to be removed from the list of documents of the CC14.