

Scam on the African Coast

The hidden Face of Chinese and joint-venture vessels
Tonnage Fraud in Senegal, Guinea Bissau and Guinea



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For more information contact: iafrica@greenpeace.org

Written by: Greenpeace Africa

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Postal Address: 2, avenue Hassan II, 6ème étage, BP 3788, Dakar, Senegal

Tel: +221 338494141, Fax: +221 338224131

Website: www.greenpeaceafrica.org/fr

Designed by: Kaitoma Creatives

Cover photo: © Greenpeace



Contents

Glossary	4
Gross Tonnage Definition	4
Executive Summary.....	5
1. Introduction.....	8
2. Methodology	9
3. Research Outcomes: The Overwhelming Evidence of Tonnage Fraud.....	11
4. The True Costs of Tonnage Fraud.....	14
5. Recommendations	20
Annexes.....	22

Glossary

CFA Franc	Franc of African Financial Communities
CNFC	China National Fisheries Corporation
DWF	Distant Water Fishing
ECOWAS	Economic Community of West African States
EEZ	Exclusive Economic Zone
EU	European Union
FAO	United Nations Food and Agriculture Organization
GDP	Gross Domestic Product
GT	Gross Tonnage
GRT	Gross Register Tonnage
IMO	International Maritime Organization
IUU	Illegal, Unreported and Unregulated (Fishing)
KW	Kilowatt
NM	Nautical Miles
SANTE	European Commission Directorate General for Health and food safety
SASAC	State-owned Assets Supervision and Administration Commission of the State Council (China)
UBC	University of British Columbia
UNCLOS	United Nations Convention on the Law of the Sea
VMS	Vessel Monitoring System

Gross Tonnage (TB) definition

The gross tonnage (GT) of a ship is calculated as a function of the total enclosed volume of a ship, applying a mathematical formula provided by the 1969 international Convention on tonnage measurement of ships.

The Convention meant a transition from the previous measurement of “gross register tonnage” (GRT) to “gross tonnage” (GT).

The acronym GRT is still commonly used although the capacity of the ships must be measured and should be expressed in GT as defined by the 1969 Convention.

Responsibilities of the flag State under the International Convention on tonnage measurement of ships

Article 6 Determination of Tonnages

The determination of gross and net tonnages shall be carried out by the Administration which may, however, entrust such determination either to persons or organizations recognised by it. In every case the Administration concerned shall accept full responsibility for the determination of gross and net tonnages.

Article 7 Issue of Certificate

(1) An International Tonnage Certificate (1969) shall be issued to every ship, the gross and net tonnages of which have been determined in accordance with the present Convention.

(2) Such certificate shall be issued by the Administration or by any person or organization duly authorised by it. In every case, the Administration shall assume full responsibility for the certificate.

“**Administration**” means the Government of the State whose flag the ship is flying.

Executive Summary

This report exposes how China's biggest distant water fishing (DWF) company, the China National Fisheries Corporation (CNFC),¹ and other Chinese companies, under-declare the gross tonnage (GT) of their fishing vessels, whether Chinese flagged or owned and operated under other flags through joint ventures, and jeopardise the sustainable and equitable exploitation of West African marine resources.² It exposes this illegal and fraudulent practice based on information available primarily in Senegal, Guinea Bissau and Guinea.³ But even these limited data and evidence show that the practice probably occurs beyond these three countries.

Greenpeace Africa identified cases where, according to available public or official sources, a different GT was declared for the same vessels at different times and/or to different countries. Greenpeace Africa then calculated the actual vessels GT, or a possible range of GT values using the formula provided by the International Convention on Tonnage Measurement of Ships⁴ and based on the vessel's blueprint, parameters and photos.⁵ In most cases, the values resulting from the calculation were compared with the vessel GT data registered in the public maritime sources such as Lloyd's, marinetransit.com, grosstonnage.com. Vessels' GT declared to the relevant governments with a lower GT than those resulting from the calculations and comparison were thus considered to have been under-declared.

The GT of a fishing vessel is one of the main parameters used to measure its fishing capacity, which is the quantity of fish a vessel is able to catch in a given period of time.

Under-declaring of GT constitutes an infraction under the laws of these three countries, so the vessels concerned operate illegally.⁶ Thus, under-declaring the vessel GT falls within the definition of illegal fishing⁷ in the United Nations Food and Agriculture Organization (FAO) International Plan of Action to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated (IUU) Fishing.

Under-declaring the GT of a fishing vessel is fraudulent since licence fees are calculated on the basis of the GT, so companies that under-declare the GT of their vessels are depriving coastal States' governments of revenue. In some countries, it also allows industrial vessels to gain access to local artisanal fishermen's fishing grounds, as is the case in Senegal.

In addition to paying lower licence fees and gaining access to coastal areas, the fraud on vessel tonnage also hides a much higher capacity to catch fish and exacerbates overfishing.

Based on available data, Greenpeace Africa calculated that, from 2000 to 2014, CNFC under-declared the GT of its vessels to the Senegalese authorities by 43% on



© Greenpeace. Soleil 11 (ex-Soachip 11) the port of Dakar, Senegal, 2013.

¹ In 2013, China National Fisheries Corporation (CNFC) owned 345 DWF vessels globally, and 163 fishing vessels were identified as currently operating in the waters of 6 West African countries (Mauritania, Senegal, Guinea Bissau, Guinea, Sierra Leone and Ghana) and Morocco.

² In 2013, there were 462 Chinese flagged and/or owned fishing vessels operating in 13 African countries: Morocco, Mauritania, Senegal, Guinea Bissau, Guinea, Sierra Leone, Ghana, Liberia, Cameroon, Gabon, Angola, Mozambique and Madagascar. 407 were identified as operating along the Atlantic coast of Africa.

³ E.g. the 2014 official lists of vessels licensed to fish in these countries

⁴ <http://www.imo.org/About/Conventions/ListOfConventions/Pages/International-Convention-on-Tonnage-Measurement-of-Ships.aspx>

⁵ See Annex I.a. for more information. Blue print analysis of the vessel type for Yuan Yu 901, Soleil 11 and Soleil 65 can be provided on request.

⁶ See Annex III for the relevant laws and regulations

⁷ Section II, point 3.1 Illegal fishing refers to activities:

3.1.1 Conducted by national or foreign vessels in waters under the jurisdiction of a State, without the permission of that State, or in contravention of its laws and regulations. <http://www.fao.org/docrep/003/y1224f/y1224f00.htm>

average annually compared to their actual GT. In 2014 alone, CNFC has fraudulently hidden a total of 1742 GT through GT fraud, the equivalent of six big industrial fishing vessels of 300 GT each.

This also represents an estimated shortfall for Senegal of at least 371,404,800 CFA Francs (566,203 EURO)⁸ in license fees that CNFC avoided paying during the period 2000 to 2014. This figure is doubtless an under-estimate as it only includes data for 15 out of the 30 years of CNFC operations in Senegal alone, and only part of the vessels for which we could estimate the actual GT. Further, it does not take into account the ecosystem damage caused and the fish illegally caught by CNFC by gaining undue access to coastal fishing grounds which are crucial for local fishing communities' livelihood.

CNFC currently owns and operates 12 vessels fishing in Senegal through a joint venture company, Senegal Armement S.A.,⁹ but its fishing operations started in Senegal in 1985. The first and most blatant evidence of CNFC's GT fraud can be traced back as far as 1988. According to official documents, CNFC's fishing vessel, *Soachip* 11,¹⁰ which was reflagged from China to Senegal in 1988, was declared with a GT 54.8% lower than its original one.

But this fraudulent practice by CNFC occurs not only in Senegal but also in Guinea Bissau and Guinea and involves other Chinese companies. Based on information from various sources, for 59 CNFC vessels fishing in Senegal, Guinea Bissau and Guinea in 2014, evidence was found showing that the GT of 44 vessels was under-declared. In total, 6757.7 GT have been "hidden" from these coastal States which represents approximately adding an equivalent of 22 extra industrial fishing vessels with a capacity of 300 GT each into their waters.

Therefore, the actual fishing capacity deployed by this company is much higher than authorised and undermines fisheries management and conservation efforts by coastal States. For example, according to the terms and conditions provided by a fisheries agreement signed between CNFC and Guinea Bissau on 28 June 2010,¹¹ it appears that, in the first half of 2014 alone, CNFC vessels actual fishing capacity exceeded the authorised capacity limit by 61% (see Annex I Table f).

When comparing available data with the 2014 official lists of vessels licensed to fish in these three countries, Greenpeace Africa found that other Chinese DWF companies were also engaged in GT fraud. For example:

- Dalian Lian Run Overseas Fishery Corp. (LianRun): inconsistent GT were found for 19 of its 24 vessels operating in Guinea and Guinea Bissau in 2014, and in

Guinea in 2013. Greenpeace Africa's investigation also shows that the company changed the declared gross tonnage of 6 of these 19 vessels when they were moved from Guinea to Guinea Bissau, as well as the GT of the vessels that continued fishing in Guinea in 2014 (see table 4).

As more data become available, this illegal practice may prove to be even more widespread, involving more vessels and companies operating in West Africa and beyond, in addition to the cases exposed in this report.

Hence, although the evidence currently available reveals that this fraudulent practice by Chinese companies occurs in at least three West African countries: Senegal, Guinea Bissau and Guinea, it may just be the tip of the iceberg. The scarcity of available data on GT of the 462 Chinese vessels fishing in African waters makes it impossible to evaluate the full extent of the fraud or to provide a complete estimate of the losses, financial, environmental and social, incurred over the last three decades.

The degree to which GT was under-reported also raises the question of how much of the reported catches by CNFC and other companies during that period were illegal. Further, considering that fish caught by Chinese companies has been sold, among others, on European markets, this also highlights loopholes in current efforts to stop trading of IUU-caught fish.

The fact that the fraud has been occurring, sometimes over a very long period, highlights the lack of oversight by responsible authorities in Senegal, Guinea Bissau and Guinea and the urgent need for stricter control by all West African coastal States over the vessels allowed to operate in their waters, even more so under their own flag. Allowing vessels to fly its flag means taking responsibility for its activities as flag State, as well as coastal State, as provided for under the United Nations Convention on the Law of the Sea (UNCLOS).¹²

It is of the utmost urgency that governments, both coastal and flag States involved, investigate the alleged fraud by Chinese fishing companies as well as the potential fraud by other industrial fishing companies with vessels fishing in their EEZs, whether foreign-flagged and/or owned/operated. In addition, all States involved should conduct a comprehensive assessment and publish the lists of fishing vessels operating in their waters and/or under their flag.

⁸ 1 Euro= 655.957 CFA Francs (conversion rate as of March 24 2015 from www.xe.com)

⁹ CNFC set up a joint venture in Senegal named SENEGAL ARMEMENT to manage Senegalese flagged Chinese vessels fishing in the Senegalese EEZ.

¹⁰ The vessel changed name in 1997 to Soleil 11

¹¹ <http://www.minpesca-gw.org/protocolo%20acordo%20gb%20e%20china%20national%20f.corporation.pdf>

¹² Article 94. Duties of the flag State



1. Introduction

West African waters remain one of the few fertile fishing grounds in the world. For many coastal countries, fishing contributes significantly to the national economy as an income source. It also contributes to job creation and, more importantly, to food security for local populations.

But West Africa is no exception to the overfishing that affects all the world's oceans. The most recent studies show a decline of many species of both demersal and pelagic fish stocks. The magnitude of the crisis in this strategic sector requires West African coastal States to reform and implement more conservation-oriented and equitable fisheries policies.

However, it remains to be seen if the future fisheries management policies will provide the required solutions, for several reasons: poor political and economic strategic choices, lack of political will, lack of resources to ensure effective control of fishing activities in their EEZ resulting in widespread illegal fishing. Taking advantage of the weaknesses of fisheries management systems, unscrupulous players undermine the future of many people who rely on this sector for their food security and livelihoods.

The case studies analysed in this report expose a widespread fraud involving Chinese companies, both vessels flying the Chinese flag and vessels operating under joint ventures and the serious and largely unquantifiable impacts on West African fishing communities' livelihood and food security, the marine environment and government revenue.

Although the focus on Illegal, Unreported and Unregulated (IUU) fishing tends to be on the most blatant abuses, other, less visible forms exist. Under-declaring the actual tonnage of vessels also amounts to fishing illegally, according to both the legislation of the coastal and flag States involved and the FAO International Plan of Action to Prevent, Deter and Eliminate IUU Fishing. In addition, since the entry into force of the International Convention on Tonnage Measurement of Ships, signed on July 18, 1982, the unique tonnage measurement of the Gross Tonnage or GT applies to all the vessels listed in this report.¹³

According to information available to Greenpeace Africa, this pervasive form of IUU fishing has been going on for almost 30 years and involves responsibilities at various levels. Both flag and coastal States involved failed to fulfil their obligations and certain companies recklessly took advantage of this lack of oversight and control.



Fishing trawler, manufactured by "Dalian Fishing Vessel Company", Atlas extract from Chinese Steel Marine Fishing Vessel, Page 7



© Greenpeace/Pierre Gleizes, West coast of Africa, 2006.

¹³ All ships built on or after July 18, 1982 while ships built before that date were allowed to retain their existing tonnage for 12 years after entry into force, or until July 18, 1994.

2. Methodology

Greenpeace Africa's preliminary research (see 2.3) confirmed what previous studies indicated: that Chinese vessels operating in West Africa may misreport their GT (see 2.4 below). For this research, we focused on the 109 Chinese flagged and/or owned fishing vessels known to operate in Senegal, Guinea Bissau and Guinea in 2014 based on official lists of vessels licensed to fish.

The different sources consulted for the GT of these Chinese fishing vessels showed that, out of these 109 vessels, 65 vessels had inconsistent GT according to different sources (see 2.3 and 2.4 below), so we investigated these discrepancies further.

2.1 To prove that inconsistency in GT declaration has occurred

Greenpeace Africa identified cases where, according to available public or official sources, a different GT for the same vessels was declared at different times and/or to different countries. These sources include:

- Official GT declared by the fishing companies to various West Africa governments and to the Chinese government;
- GT data for the vessels listed on lloydslistintelligence.com, MarineTraffic.com, GrossTonnage.com and other maritime related public sources.

2.2 To further prove that GT has been under-declared

- We identified the types of vessels owned by these companies and obtained the blueprint of each type and their parameters, sometimes including the GT. When the vessels' GT was not available, we calculated it based on their blueprint, parameters and photos,¹⁴ using the calculation method provided by the International Convention on Tonnage Measurement of Ships. Depending on the information available, the result of the calculation was a possible range of GT values. We then verified our calculation with the vessel GT data registered in the public maritime sources mentioned above and found out that they were identical.
- We therefore used GT data from public maritime sources as the actual GT data for vessels of the same model. For

vessels without GT data on public maritime sources, we assumed that the GT calculated from the blueprint, or the lower value in cases of a range, was the actual GT. Vessel GT declared to the relevant governments with a lower GT than this figure is thus considered to have been under-declared.

2.3 Greenpeace Africa research, data collection and analysis

- 1988: copies of the vessel's original tonnage certificate¹⁵ as well as the Senegalese flagging certificate for *Soleil 11* (ex-*Soachip 11*) were obtained. These documents mention two different figures for gross tonnage; one in Chinese with the actual gross tonnage of 299GT and one in French with the tonnage of 135GT declared to Senegal.
- 2004: according to the Sub-regional Fisheries Commission surveillance programme, *Soleil 12* declared a false tonnage in Gambia.¹⁶
- 2012-2014: the research conducted on cases identified in Senegal, Guinea Bissau and Guinea shows that four Chinese flagged and/or owned fishing vessels (*Zhong Shui 9416*, *Zhong Shui 9417*, *Zhong Shui 9418*, *Zhong Shui 9419*), which operated in Guinea in 2013 with a certain declared GT, then moved to Guinea Bissau in 2014 where they were declared with a different GT.

2.4 Other studies

- 2007: the *ex-post/ex-ante* evaluation report on fisheries agreements between the European Union and Guinea questioned the real GT of the Chinese vessels stating that "they are between 40 and 45 meters long, but they declared a tonnage of 150GT" whereas the same size European vessels average tonnage is around 300GT. Such a difference is difficult to justify technically, therefore the authors estimated that "the GT authorised are based on values that do not correspond to reality and are underestimated".¹⁷
- 2013: The Fisheries Centre of the University of British Columbia (UBC) research paper¹⁸ provides tonnage data that differ from the gross tonnage declared by the fishing companies to the Senegalese government.
- 2013: The NGO *Transparentsea*¹⁹ published the 2013 list of licensed fishing vessels in Guinea. The Guinean administration has obtained information from the Lloyds Register for vessels fishing in Guinea with their

¹⁴ See Annex I.a. for more information. Blue print analysis of the vessel type for Yuan Yu 901, Soleil 11 and Soleil 65 can be provided on request.

¹⁵ "Acte de nationalité"

¹⁶ Reported by the Surveillance Operations Coordination Unit of the Sub-Regional Fisheries Commission (SRFC), This program was funded by Luxembourg from 1995 to 2004, and then by the EU from Dec. 2010 to Dec.2013

¹⁷ Convention Spécifique N°8 : Évaluation Ex-Post du Protocole d'accord de Pêche entre la Communauté Européenne et la République de Guinée, Analyse Économique de la rentabilité de la flotte chalutière, Analyse de l'impact du Protocole futur sur la durabilité, y compris l'évaluation Ex-Ante, Rapport final. 30 novembre 2007. Page 81 http://transparentsea.co/images/6/65/EC_evaluation_Guinea2007.pdf

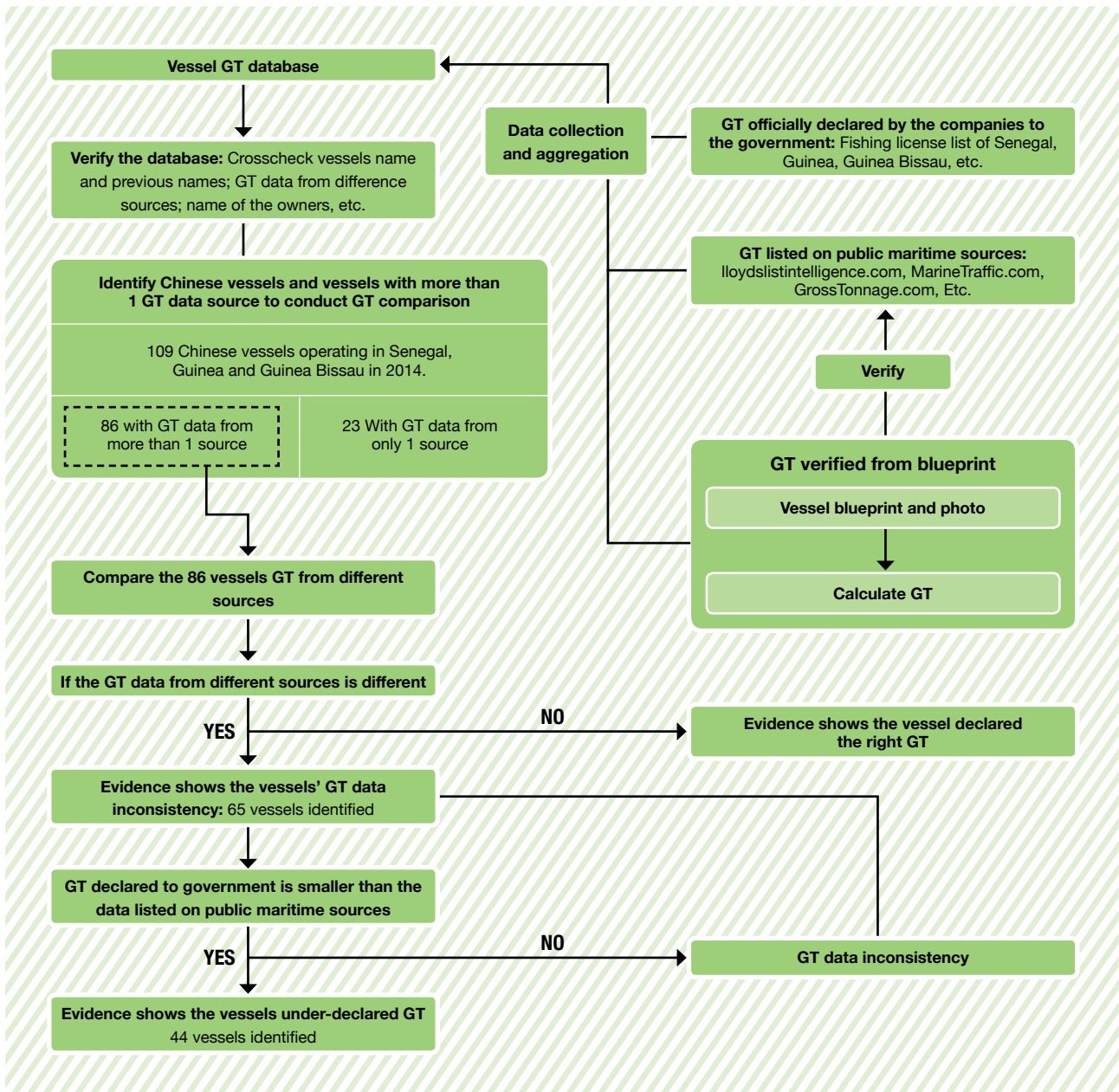
¹⁸ <http://www.searounds.org/researcher/dpauly/PDF/2014/Other/BeyondTheUnseen.Senegal.pdf> (see Appendix Table A2 in Sea Around Us study: GRTs are very different from the GRT data from Senegal's 2014 list of licensed vessels).

¹⁹ http://transparentsea.co/index.php?title=Main_Page

actual tonnage.²⁰ It reveals that the GT declared by various companies, including CNFC, on the 2013 official list of licensed vessels and the tonnage data obtained from Lloyd's or other sources are different.²¹ It is regrettable that despite having access to such information the Guinean authorities do not appear to act

upon it. For example, the GT of CNFC vessel, *Zhi Jiang 3*, was declared to Guinea both in 2013 and 2014 as 150, although in 2013, Guinean authorities had data showing the vessel's GT as 299, data which is also publicly available from marinetraffic.com.²²

2.5 Methodology Flow Chart



²⁰ <http://www.icsf.net/fr/samudra/article/EN/42-933-Staling-fish,-.html>

²¹ List of licensed vessels for 2013 in Guinea– see data in right hand margin: “Données Internet” http://transparentsea.co/images/c/c6/Guinea_conakry_vessellist2013.pdf

²² <https://www.marinetraffic.com/en/ais/details/ships/shipid:895475/mmsi:-8863862/vessel:ZHI%20JIANG%2003>

3. Research outcomes: the overwhelming evidence of tonnage fraud

CNFC vessels under-declared GT in Senegal

• CNFC is the only Chinese fishing company operating in Senegal. The CNFC vessel, *Soleil 11* (ex-*Soachip 11*), was transferred and reflagged to Senegal in 1988 with a declared GT lower than its original one. The International tonnage certificate for *Soachip 11* dated 10 January 1988 declares 299 GRT (according to the International

Convention on Tonnage Measurement of Ships). When the vessel was transferred and reflagged to Senegal on 30 May 1988 and registered on 31 May 1988 under nr DAK 821, its declared tonnage was 135 GRT.

Procedure and conditions for a fishing vessel to obtain Senegalese nationality

A vessel acquires Senegalese nationality via an administrative act which confers on it the right to fly the Senegalese flag. The conditions for such naturalisation are provided for in the Merchant Marine Code and implementing decree.²³ The process of naturalisation of fishing vessels is under the responsibility of the National Agency for Maritime Affairs through its Fleet Management Division.

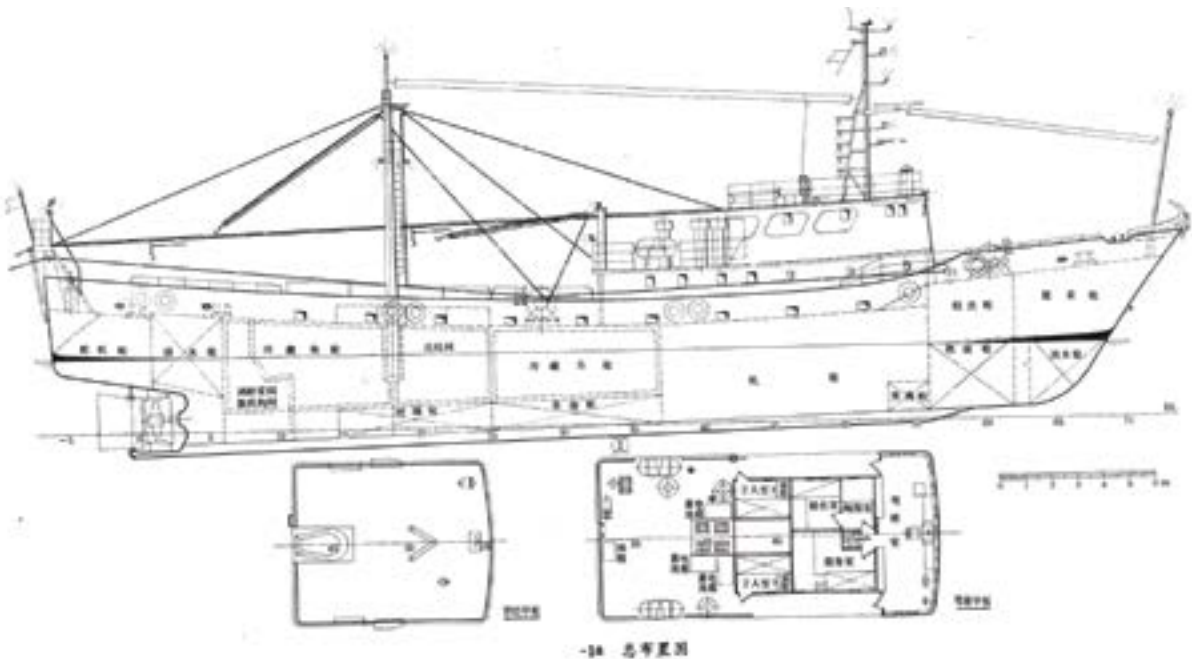
In order to obtain Senegalese nationality, a vessel must fulfil the following conditions:²⁴

- belong for at least 50% to citizens or nationals of a country member of ECOWAS;
- or belong completely to a company whose head office is in Senegal and is controlled by citizens or nationals of a country member of ECOWAS;
- and have fulfilled the process of “individualisation”²⁵

The Merchant Marine Code Implementing Decree²⁶ specifies the formalities and supporting documentation to be provided to obtain the nationality, including a **tonnage certificate**.

Article 96 of the Merchant Marine Code stipulates the conditions under which a vessel will lose the Senegalese nationality, including:

- Serious breach of the obligations to obtain the nationality;
- Any change to the vessel without prior declaration.



Blue print of the vessel Soleil 11.

²³ Loi n°2002 du 16 Août 2002 portant Code de la Marine Marchande ; DECRET n° 2004-283 du 5 mars 2004 fixant les modalités d'application de la loi n° 2002-22 du 16 août 2002 portant Code de la Marine Marchande

²⁴ Art 90 - Code de la Marine Marchande (Article 90)

²⁵ Art 85 - Code de la Marine Marchande; Elements for “individualisation” are: name, home port, nationality, tonnage and registration number.

²⁶ Articles 63, 64, 65, 64 and 66

- The number of CNFC owned vessels fishing in Senegal varied from year to year. From 2000 to 2014, during most years there were on average around 12 vessels, except in 2000 where there were 24 vessels and in 2004 where, for some unknown reason, there were only 2. We could only find gross tonnage data from public sources for the 12 vessels operating there in 2014 in order to compare with the data on the Senegalese official list of licensed vessels. The comparison listed in Table 1 shows that:
 - In 2014, all 12 vessels under-declared their GT by an average of 44%;
 - In 2014, the total declared GT was 2202. However, the GT available from public sources was 3944;
 - For 2000 to 2014, the average under-declared GT was 43% (see ANNEX I.b.);
 - The loss in license fees from 2000 to 2014 is estimated at 371,404,800 CFA Francs, (566,203 EURO).²⁷

Table 1: CNFC vessels under-declared GT in Senegal for 2014

	Name	GT on official list	GT from public information	Discrepancy	% under-declared
1	SOLEIL 7	193	303	110	36%
2	SOLEIL 8	193	303	110	36%
3	SOLEIL 9	193	303	110	36%
4	SOLEIL 10	193	303	110	36%
5	SOLEIL 11	135	299	164	55%
6	SOLEIL 12	135	299	164	55%
7	SOLEIL 51	198	327	129	39%
8	SOLEIL 61	198	327	129	39%
9	SOLEIL 65	191	370	179	48%
10	SOLEIL 66	191	370	179	48%
11	SOLEIL 67	191	370	179	48%
12	SOLEIL 68	191	370	179	48%
Total GT/ Average % of GT under-declared		2202	3944	1742	44%



© Greenpeace/Guillaume Bassinet, Soleil 7, Port of Dakar, Senegal, 2014.

²⁷ See Annex II c for more information

Chinese-owned vessels' GT fraud and inconsistencies in Senegal, Guinea Bissau and Guinea

As shown in Table 2 below:²⁸

- a total of 109 Chinese-owned vessels were identified operating in Senegal, Guinea Bissau and Guinea from 2012 to 2014
- For 86 vessels, two or more sources of GT data were found to allow a comparison.
- For 65 of these 86 vessels, inconsistent GT data were reported in different sources (see tables 2 to 5). These 65 vessels can be classified in 2 categories:

a) Under-declared GT: 44 vessels

- Out of these 65 vessels, we found **evidence of under-declaration** of GT for 44 vessels. Their GT as declared to the coastal States is smaller than the GT as declared to public maritime sources or the GT verified by Greenpeace from the vessel blueprints. Based on actual GT as derived from the blueprints and public maritime sources, the total under-declared tonnage is 6757.7 GT, approximately the equivalent of 22 industrial fishing vessels with a capacity of 300 GT each. These 44 vessels were all owned by CNFC.

b) Inconsistent GT declared: 21 vessels

For the other 21 vessels, the GT declared to different coastal States at different times varied:

- 19 LianRun vessels were declared with different GT in Guinea in 2013 compared to 2014; and when 6 of its vessels were transferred from Guinea to Guinea Bissau

in 2014, the company changed the vessels' GT again (see Table 4).²⁹ It was not possible to calculate the GT as no blueprint or public sources reference could be found.

- 2 CNFC vessels, *Zhong Shui 9416* and *Zhong Shui 9417*, were declared with different GT in Guinea in 2013 and Guinea Bissau in 2014. Furthermore, the declared tonnage values were different from the GT registered in the public maritime sources.³⁰ No blueprint was available for these vessels but, based on the comparison with data from public sources it seems that these vessels over-declared their GT.



© Greenpeace/Christian Åslund. Young boys playing with the catch in a small fishing community at Corniche Ouest... 2010.

Table 2: Chinese owned vessels' GT fraud in Senegal, Guinea Bissau and Guinea in 2014

Fishing area	Senegal	Only in Guinea	In both Guinea and Guinea Bissau	Only in Guinea-Bissau	Total
1. 109 Chinese owned vessels fishing in Senegal, Guinea and Guinea Bissau	12	28	28	41	109
2. 86 of the 109 Chinese owned vessels with GT data from 2 or more sources	12	13	28	33	86
2.1 55 CNFC owned vessels	12	0	16	27	55
2.2 19 LianRun ³¹ owned vessels	0	13	0	6	19
2.3 12 Fujian ³² owned vessels	0	0	12	0	12
3. 65 of the 86 Chinese owned vessels with inconsistent GT	12	13	8	32	65
3.1 46 CNFC owned vessels	12	0	8	26	46
3.2 19 LianRun owned vessels	0	13	0	6	19
4. 44 of the 65 Chinese owned vessels that under-declared their GT	12	0	8	24	44
4.1 44 CNFC owned vessels	12	0	8	24	44

²⁸ See methodology section of this report for more detailed explanations.

²⁹ In table 5 we summarised the data for specific years, because vessels are moving between West African EEZs

³⁰ Eg: loydslistintelligence.com, marinetrffic.com, grosstonnage.com

³¹ *Dalian Lian Run Overseas Fishery Corp.*

³² *Fujian Pingtan Hengli Fishery Co.,Ltd.*

© Greenpeace/Pierre Gleizes. Rusting Fishing Vessel LIAN RUN 23, Conakry, Guinea, 2006.



© Greenpeace/Pierre Gleizes. Rusting Fishing Vessel LIAN RUN 29, Conakry, Guinea, 2006.



Table 3: CNFC GT fraud in Senegal, Guinea Bissau and Guinea in 2014

Fishing area	Senegal	Only in Guinea	Only in Guinea-Bissau	In both Guinea and Guinea Bissau	Total
59 CNFC owned vessels fishing in Senegal, Guinea and Guinea Bissau	12	0	31	16	59
55 CNFC owned vessels with GT data from more than one source	12	0	27	16	55
46 CNFC owned vessels with GT data inconsistencies	12	0	26	8	46
44 CNFC GT under-declared	12	0	24	8	44

An overview of the actual tonnage, declared tonnage and the under-declared GT in the three countries.

There were 12 vessels fishing in Senegal, with a total declared tonnage of 2202 GT. The actual tonnage of these vessels was 3944 GT, resulting in an under-declared 1742 GT.

There were 24 vessels fishing only in Guinea-Bissau, with a declared tonnage of 4773 GT. The actual tonnage of these vessels was 7292.7 GT, resulting in an under-declared 2519.7 GT in Guinea-Bissau.

There were a further 8 vessels fishing in both Guinea and Guinea-Bissau. The declared tonnage of these vessels in Guinea and Guinea Bissau was 1200 GT. The actual tonnage of these 8 vessels was 2448 GT, resulting in an under-declared tonnage of 1248 in Guinea and Guinea-Bissau.

In conclusion, in the three countries, all Chinese under-declared GT vessels are owned by CNFC. In Senegal, 100% of CNFC owned vessels under-declared GT. In Guinea and Guinea Bissau, 68% of CNFC owned vessels under-declared GT

Table 4: LianRun vessels' GT inconsistency in Guinea and Guinea Bissau (2013-2014)

Name of vessel	2013 Guinea	2014 Guinea	2014 Guinea Bissau
LIAN RUN 17	160	232	
LIAN RUN 18	160	232	
LIAN RUN 21	160	232	
LIAN RUN 22	200	232	
LIAN RUN 23	180	258	
LIAN RUN 25	180		248
LIAN RUN 26	180	248	
LIAN RUN 27	180		258
LIAN RUN 28	180	258	
LIAN RUN 29	200		258
LIAN RUN 30	200		258
LIAN RUN 31	200		232
LIAN RUN 32	200		232
LIAN RUN 33	160	271	
LIAN RUN 34	160	271	
LIAN RUN 35	160	258	
LIAN RUN 36	160	271	
LIAN RUN 37	160	271	
LIAN RUN 38	160	271	

GT fraud: a widespread practice?

Apart from Senegal, Guinea and Guinea Bissau, Chinese-owned vessels are also operating in the waters of many other African countries: Morocco, Mauritania, Sierra Leone, Ghana, Liberia, Cameroon, Gabon, Angola, Mozambique and Madagascar. Despite the scarcity of available data and lack of transparency, more potential cases of GT fraud may be exposed through further research. For example, Shandong Overseas Fisheries Development Co. Ltd. (Shandong) was found to under-declare the GT of 1 of its vessels in Ghana in 2013 (Table 5).

Although the evidence currently available reveals that this fraudulent practice by Chinese companies occurs in at least three West African countries, this may just be the tip of the iceberg of a more widespread and systematic illegal practice by industrial fishing companies in Africa that involves not only Chinese companies.

Table 5: Shandong Overseas Fisheries Development Co. Ltd. vessels' GT fraud in Ghana in 2013

Name	GT declared to Ghana in 2013 ³³	GT on marinetrffic.com and grosstonnage.com
Zhong Lu 703	278	299



© Greenpeace/Gordon Welters. Harbour of Joal. Unloading of fish at the beach, Senegal. 2011.

³³ http://transparentsea.co/images/6/6e/Ghana_license_list2013.pdf

4. The true costs of tonnage fraud

The case studies above expose the serious and systematic use of fraudulent data on vessel tonnage by Chinese companies operating in West Africa. This section describes the insidious cumulative impacts of this practice on West African fishing communities' livelihood, food security, the marine environment and government revenue.

Under-declaring GT gives vessels illegal access to coastal fishing grounds

- Senegalese fisheries legislation divides fishing grounds into zones, where access is based on vessels' GT³⁴ (see Table 6). CNFC's fraud allowed its vessels to operate

in fishing grounds closer to the coast which would be off limit based on the actual vessels tonnage. Coastal areas are of vital importance both as nursing grounds for many marine species but also as traditional fishing grounds for local coastal communities. Industrial vessels operating in these areas undermine the environmental sustainability of fisheries as well as the livelihood of local artisanal fishing communities. CNFC vessels have been fishing illegally in prohibited areas which are considered a very serious infraction according to the law of Senegal.³⁵

Table 6: CNFC under-declared GT vessels' access to Senegal coastal fishing grounds

Fishing zones (license fish/cephalopods)	Actual	Declared	Implication
<ul style="list-style-type: none"> • Vessels below 250 GT are allowed to fish up to 6/7 nautical miles (NM) from the coast • Vessels between 250 and 300 GT must fish at least 12 NM from the coast • Vessels between 300 and 500 GT must fish at least 15 NM from the coast 	Two vessels with an actual GT of 299	Both declared as vessels below 200 GT	<ul style="list-style-type: none"> - Based on their actual GT, these vessels should fish at least 12 NM off the coast - their declared GT allows them to operate up to 6-7 NM from the coast
	10 vessels with an actual GT over 300	All declared as vessels below 200 GT	<ul style="list-style-type: none"> - Based on their actual GT, these 10 ships should fish at least 15 NM off the coast. - their declared GT allows them to operate up to 6-7 NM from the coast



© Greenpeace/Pierre Cleizes, West coast of Africa, 2006.

³⁴ Décret n° 98-498 - art 44 http://www.spcsrp.org/medias/csrf/Leg/SN/Leg_SN_1998_DCR-00498.pdf
³⁵ Loi n° 98-32 - art 85 (b) http://www.spcsrp.org/medias/csrf/Leg/SN/Leg_SN_1998_LOI-00032.pdf

Under-declaring GT Undermines Sustainable Fisheries Management

- GT fraud also directly undermines conservation and management measures and exacerbates overfishing. Limiting fishing capacity is one way to limit the amount of fish caught in a given period of time. For example, the fisheries agreement between Guinea Bissau and CNFC, signed on 28 June 2010,³⁶ authorised CNFC to operate fishing vessels with a total GT limit per year. However, in the first half of 2014 alone, CNFC actual deployed fishing capacities exceed the limit by 61%. According to various sources, in 2014 alone, out of the 59 CNFC vessels fishing in these three countries, the GT of 44 CNFC vessels was under-declared. In total, 6757.7 GT have been “hidden” from these three coastal States which represents approximately the equivalent of adding 22 extra industrial fishing vessels with a capacity of 300 GT each into these West Africa waters.

Under-declaring GT is an infraction

- Under-declaring GT is illegal under the legislation of China, Senegal, Guinea and Guinea Bissau and therefore, fishing vessels declared under a false GT operate illegally.³⁷
- The three West African countries considered in this study require that technical specifications of industrial fishing vessels, including GT, be declared to the relevant authority. All three countries consider incorrect GT data as an infraction, and particularly in Senegal and Guinea Bissau, it is considered a serious offense.³⁸
- China’s regulation, “Regulations of the People’s Republic of China on Survey of Fishery Vessels”,³⁹ stipulates that the tonnage may not be changed without the authorization of the original fishery vessel survey agency, and any misreporting is a punishable offence.

Under-declaring GT is stealing money from African nations

Fisheries represent an important source of revenue for West African governments. These revenues are derived from fishing license fees, fisheries agreements, fines for fishing violations, direct taxes on fishing enterprises, etc. The loss incurred by the cumulative impacts of the GT fraud is one important factor contributing to a shortfall in potential government revenue.⁴⁰

- In all three countries considered in this study, fees for fishing licenses, which need to be renewed yearly, are calculated according to the GT of the fishing vessels. We found that by under-declaring its vessels’ GT, CNFC has systematically and persistently operated illegally and fraudulently in these three countries. It has effectively stolen money from these African nations.
- Estimated losses incurred by CNFC fraud on vessel GT:
 - In Senegal, in 2014 alone: 42,156,400 CFA Franc (about 64,267 Euros). Based on the data Greenpeace Africa has been able to obtain, the vessels have evaded paying at least 371,404,800 CFA Francs, (566,203 EURO) in license fees to Senegal from 2000 to 2014.
 - In Guinea, between September and December 2014: at least 106,697.5 USD, about 98,855 EURO.⁴¹
 - In Guinea Bissau, between January and June 2014: at least 344,701.8 USD, about 319,366 EURO.

Unquantified impacts of GT fraud

Last but not least, it is important to note that not all impacts can be evaluated in financial terms. In addition to the revenue losses, other economic impacts would either require much more data to be calculated, such as accumulated fines for illegal behaviour (e.g. fishing in a prohibited area in Senegal), value of the illegally-caught fish, etc; or else cannot be quantified at all, such as impacts on the marine environment, local fishing communities’ livelihood and food security (e.g. landing obligations).⁴²

For example, in Senegal, it is estimated that in 2011, fisheries contributed 1.3% of the GDP. However, this does not account for post-harvest activities. According to FAO studies, artisanal catching and processing operations represent 4.8% of the GDP. The fisheries sector provides 600,000 direct as well as indirect jobs, particularly for women in artisanal fish processing and marketing. There are 100,000 fishermen, of which 90% in the artisanal fishing sector. One out of six Senegalese work in the sector.⁴³ Almost 90% of the landings are done by the artisanal fishing sector, making an important contribution to food security: fish represents 44% of the animal protein consumed by the Senegalese population.⁴⁴

³⁶ <http://www.minpesca-gw.org/protocolo%20acordo%20gb%20e%20china%20national%20f.corporation.pdf>

³⁷ FAO International Plan of Action to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing

³⁸ See Annex III for the relevant laws and regulations

³⁹ *Ibid.*

⁴⁰ Policy Research – Implications of Liberalization of Fish Trade for Developing Countries, A Case Study for Guinea. Youssouf N’DIA. July 2004. Food and Agriculture Organization (FAO) of the United Nations, Rome. Page 21

⁴¹ 1 USD= 0.9265 EURO

⁴² <http://www.icsf.net/fr/samudra/article/EN/42-933-Stealing-fish,-.html> “until very recently, the vessel tonnage references used were called ‘consensual GRT’. The consensual GRT didn’t reflect the real tonnage of the boat. To address that problem, the Guinean administration obtained information from the Lloyds Register for boats fishing in Guinea with their true tonnage”

⁴³ Conseil Inter Ministériel sur la pêche, Document Introductif, 6 juin 2013

⁴⁴ The State of World Fisheries and Aquaculture (SOFIA), FAO, 2014



5. Recommendations

- The Governments of Senegal, Guinea Bissau and Guinea to immediately carry out a comprehensive investigation into the alleged GT fraud by Chinese fishing companies as well as the potential GT fraud by other industrial companies with vessels fishing in their EEZs, whether foreign flagged and/or owned/operated;
- The Government of China to immediately carry out a comprehensive investigation into the alleged GT fraud by its companies operating in Senegal, Guinea Bissau and Guinea specifically, and into potential fraud by all other Chinese companies and vessels authorised to fish in other African countries' EEZ;
- All West African coastal States to immediately investigate potential GT fraud by industrial fishing operators with foreign flagged and/or owned/operated vessels that are licensed to fish in their EEZs;
- All States to verify the GT of vessels flying their flag and fishing in the EEZs of African coastal States;
- All coastal States to make public the lists of vessels authorised to fish in their waters, including inter alia, vessel identity, beneficial owner and technical characteristics.



© Greenpeace/Clément Tardif. Artisanal Fishermen in Senegal. 2012.



© Greenpeace/Clément Taruff. Artisanal Fishermen in Senegal, 2012.

ANNEXES

ANNEX I List of vessels suspected of under-declaring their tonnage

A. List of the 66 vessels with GT inconsistencies (including under-declared)

(65 vessels with GT inconsistency in Senegal, Guinea and Guinea Bissau in 2014 and 1 vessel in Ghana in 2013)

(Country codes based on ISO 3166 - Codes for countries and their subdivisions)

(In the vessels listed below, the blue print of Yuan Yu 901, Soleil 11-12 and Soleil 65-68 can be provided on request)

No	Vessel English Name	Vessel EX English Name	Owner (English Name)	GT declared to local government					GT on the evidence	Fishing Area (latest info)
				GIN 2014	GNB 2014	GIN 2013	SEN 2014	GHA 2013		
1	CNFC 9305		CNFC	n/a	199	n/a	n/a	n/a	290	GNB/2014
2	CNFC 9307		CNFC	n/a	199	n/a	n/a	n/a	290	GNB/2014
3	CNFC 9308		CNFC	n/a	199	n/a	n/a	n/a	290	GNB/2014
4	CNFC 9502	SINO19	CNFC	n/a	199	n/a	n/a	n/a	290	GNB/2014
5	CNFC 9509	SINO20	CNFC	n/a	198	n/a	n/a	n/a	327	GNB/2014
6	CNFC 9510	SINO2	CNFC	n/a	198	n/a	n/a	n/a	327	GNB/2014
e	CNFC 9511	SINO22	CNFC	n/a	198	n/a	n/a	n/a	327	GNB/2014
8	CNFC 9512	SINO	CNFC	n/a	198	n/a	n/a	n/a	327	GNB/2014
9	HE BEI 801		CNFC	n/a	199	n/a	n/a	n/a	319	GNB/2014
10	HE BEI 802		CNFC	n/a	199	n/a	n/a	n/a	319	GNB/2014
11	JIU YUAN 811		CNFC	150	150	150	n/a	n/a	293	GIN&GNB/2014
12	JIU YUAN 812		CNFC	150	150	150	n/a	n/a	293	GIN&GNB/2014
13	LIAN RUN 17		DALIAN LIANRUN OVERSEAS FISHERIES CO. LTD.	232	n/a	160	n/a	n/a	n/a	GIN/2014
14	LIAN RUN 18		DALIAN LIANRUN OVERSEAS FISHERIES CO. LTD.	232	n/a	160	n/a	n/a	n/a	GIN/2014
15	LIAN RUN 21		DALIAN LIANRUN OVERSEAS FISHERIES CO. LTD.	232	n/a	160	n/a	n/a	n/a	GIN/2014
16	LIAN RUN 22		DALIAN LIANRUN OVERSEAS FISHERIES CO. LTD.	232	n/a	200	n/a	n/a	n/a	GIN/2014
17	LIAN RUN 23		DALIAN LIANRUN OVERSEAS FISHERIES CO. LTD.	258	n/a	180	n/a	n/a	n/a	GIN/2014
18	LIAN RUN 25		DALIAN LIANRUN OVERSEAS FISHERIES CO. LTD.	n/a	248	180	n/a	n/a	n/a	GNB/2014
19	LIAN RUN 26		DALIAN LIANRUN OVERSEAS FISHERIES CO. LTD.	248	n/a	180	n/a	n/a	n/a	GIN/2014
20	LIAN RUN 27		DALIAN LIANRUN OVERSEAS FISHERIES CO. LTD.	n/a	258	180	n/a	n/a	n/a	GNB/2014
21	LIAN RUN 28		DALIAN LIANRUN OVERSEAS FISHERIES CO. LTD.	258	n/a	180	n/a	n/a	n/a	GIN/2014
22	LIAN RUN 29		DALIAN LIANRUN OVERSEAS FISHERIES CO. LTD.	n/a	258	200	n/a	n/a	n/a	GNB/2014
23	LIAN RUN 30		DALIAN LIANRUN OVERSEAS FISHERIES CO. LTD.	n/a	258	200	n/a	n/a	n/a	GNB/2014
24	LIAN RUN 31		DALIAN LIANRUN OVERSEAS FISHERIES CO. LTD.	n/a	232	200	n/a	n/a	n/a	GNB/2014
25	LIAN RUN 32		DALIAN LIANRUN OVERSEAS FISHERIES CO. LTD.	n/a	232	200	n/a	n/a	n/a	GNB/2014
26	LIAN RUN 33		DALIAN LIANRUN OVERSEAS FISHERIES CO. LTD.	271	n/a	160	n/a	n/a	n/a	GIN/2014
27	LIAN RUN 34		DALIAN LIANRUN OVERSEAS FISHERIES CO. LTD.	271	n/a	160	n/a	n/a	n/a	GIN/2014
28	LIAN RUN 35		DALIAN LIANRUN OVERSEAS FISHERIES CO. LTD.	258	n/a	160	n/a	n/a	n/a	GIN/2014
29	LIAN RUN 36		DALIAN LIANRUN OVERSEAS FISHERIES CO. LTD.	271	n/a	160	n/a	n/a	n/a	GIN/2014

30	LIAN RUN 37		DALIAN LIANRUN OVERSEAS FISHERIES CO. LTD.	271	n/a	160	n/a	n/a	n/a	GIN/2014
31	LIAN RUN 38		DALIAN LIANRUN OVERSEAS FISHERIES CO. LTD.	271	n/a	160	n/a	n/a	n/a	GIN/2014
32	SOLEIL 10	SOACHIP 10	CNFC	n/a	n/a	n/a	193	n/a	303	SEN/2014
33	SOLEIL 11	SOACHIP XI	CNFC	n/a	n/a	n/a	135	n/a	299	SEN/2014
34	SOLEIL 12	SOACHIP 12	CNFC	n/a	n/a	n/a	135	n/a	299	SEN/2014
35	SOLEIL 51	CNFC 9514	CNFC	n/a	n/a	n/a	198	n/a	327	SEN/2014
36	SOLEIL 61	CNFC 9515	CNFC	n/a	n/a	n/a	198	n/a	327	SEN/2014
37	SOLEIL 65	YUAN YU 907	CNFC	n/a	n/a	n/a	191	n/a	370	SEN/2014
38	SOLEIL 66	YUAN YU 908	CNFC	n/a	n/a	n/a	191	n/a	370	SEN/2014
39	SOLEIL 67	YUAN YU 909	CNFC	n/a	n/a	n/a	191	n/a	370	SEN/2014
40	SOLEIL 68	YUAN YU 910	CNFC	n/a	n/a	n/a	191	n/a	370	SEN/2014
41	SOLEIL 7	SOACHIP 7	CNFC	n/a	n/a	n/a	193	n/a	303	SEN/2014
42	SOLEIL 8	SOACHIP 8	CNFC	n/a	n/a	n/a	193	n/a	303	SEN/2014
43	SOLEIL 9	SOACHIP 9	CNFC	n/a	n/a	n/a	193	n/a	303	SEN/2014
44	YUAN YU 10		CNFC	n/a	190	n/a	n/a	n/a	286	GNB/2014
45	YUAN YU 15		CNFC	n/a	192	n/a	n/a	n/a	304	GNB/2014
46	YUAN YU 16		CNFC	n/a	192	n/a	n/a	n/a	304	GNB/2014
47	YUAN YU 17		CNFC	n/a	192	n/a	n/a	n/a	304	GNB/2014
48	YUAN YU 9		CNFC	n/a	190	n/a	n/a	n/a	286	GNB/2014
49	YUAN YU 901		CNFC	n/a	243	n/a	n/a	n/a	351.95	GNB/2014
50	YUAN YU 902		CNFC	n/a	243	n/a	n/a	n/a	351.95	GNB/2014
51	YUAN YU 906		CNFC	n/a	175	n/a	n/a	n/a	252.8	GNB/2014
52	YUE YUAN YU 1		CNFC	n/a	190	n/a	n/a	n/a	286	GNB/2014
53	YUE YUAN YU 2		CNFC	n/a	190	n/a	n/a	n/a	286	GNB/2014
54	YUE YUAN YU 7		CNFC	150	150	150	n/a	n/a	290	GIN&GNB/2014
55	YUE YUAN YU 8		CNFC	150	150	150	n/a	n/a	290	GIN&GNB/2014
56	ZHI JIANG 03		CNFC	150	150	150	n/a	n/a	299	GIN&GNB/2014
57	ZHI JIANG 04		CNFC	150	150	150	n/a	n/a	299	GIN&GNB/2014
58	ZHI JIANG 05		CNFC	150	150	150	n/a	n/a	342	GIN&GNB/2014
59	ZHI JIANG 06		CNFC	150	150	150	n/a	n/a	342	GIN&GNB/2014
60	ZHONG LU 703		SHANDONG OVERSEAS FISHERIES DEVELOPMENT CO. LTD.	n/a	n/a	n/a	n/a	278	299	GHA/2013
61	ZHONG SHUI 9201		CNFC	n/a	196	n/a	n/a	n/a	295	GNB/2014
62	ZHONG SHUI 9412		CNFC	n/a	196	n/a	n/a	n/a	299	GNB/2014
63	ZHONG SHUI 9416		CNFC	n/a	199	150	n/a	n/a	135	GNB/2014
64	ZHONG SHUI 9417		CNFC	n/a	199	150	n/a	n/a	135	GNB/2014
65	ZHONG SHUI 9418		CNFC	n/a	199	150	n/a	n/a	290	GNB/2014
66	ZHONG SHUI 9419		CNFC	n/a	199	150	n/a	n/a	290	GNB/2014

B. List of Chinese vessels operating in Senegal from 1988-2014

(The highlighted vessels are those for which GT data were obtained from public maritime sources)

Gross Tonnage data from Senegal official list of licensed vessels and research findings																	
Name	2014	2013	2012	2011	2010	2009	2008	2007	2006	2005	2004	2003	2002	2001	2000	1988	Real GT
SOLEIL 7	193	193	193	193	193	193	193	193	193	193		193	193	193			303
SOLEIL 8	193	193	193	193	193	193	193	193	193	193		193	193	193	193		303
SOLEIL 9	193	193	193	193	193	193	193	193	193	193		193	193	193	193		303
SOLEIL 10	193	193	193	193	193	193	193	193	193	193		193	193	193			303
SOLEIL 11	135	135	135	135	135	135	135	135	135	135		135	135	135	135	135	299
SOLEIL 12	135	135	135	135	135	135	135	135	135	135		135	135	135	135		299
SOLEIL 51	198	198	198	198	198	198	198										327
SOLEIL 61	198	191	191	198	198	198	198										327
SOLEIL 65	191	191	191	191	191												370
SOLEIL 66	191	191	191	191	191												370
SOLEIL 67	191	191	191	191	191												370
SOLEIL 68	191	191	193	191	191												370
Sum of above	2202	2195	2197	2202	2202	1438	1438	1042	1042	1042		1042	1042	1042	656	135	3944
% under-declared	44%	44%	44%	44%	44%	42%	42%	42%	42%	42%		42%	42%	42%	46%	Average for 2000-2014: 43%	
SOLEIL 19					199			199	199	199		199	199		199		
SOLEIL 19					199			199	199	199		199	199		199		
SOLEIL 20					199			199	199	199		199	199		199		
SOLEIL 25					199			199	199	199		199	199		199		
SOLEIL 5								148	148	148	148	148	148		148		
SOLEIL 6								148	148	148	148	148	148	148	148		
SOLEIL 29								199	199	199		199	199		199		
SOLEIL 15															199		
SOLEIL 15															199		
SOLEIL 16															199		
SOLEIL 17															193		
SOLEIL 18															199		
SOLEIL 21															199		
SOLEIL 22															199		
SOLEIL 23															199		
SOLEIL 24															199		
SOLEIL 26															199		
SOLEIL 27															199		
SOLEIL 28															199		
SOLEIL 30															199		

C. Fees owed by CNFC to Senegal for 2014:

No	Vessel English Name	Declared GT	GT on the evidence	GT discrepancy	License type	License duration	license fee (CFA per year per GT)	Fees owed (CFA)
1	SOLEIL 7	193	303	110	LPDC (type of fishery) CHPC (type of vessel)	2014	24200	2662000
2	SOLEIL 8	193	303	110	LPDC (type of fishery) CHPC (type of vessel)	2014	24200	2662000
3	SOLEIL 9	193	303	110	LPDC (type of fishery) CHPC (type of vessel)	2014	24200	2662000
4	SOLEIL 10	193	303	110	LPDC (type of fishery) CHPC (type of vessel)	2014	24200	2662000
5	SOLEIL 11	135	299	164	LPDC (type of fishery) CHPC (type of vessel)	2014	24200	3968800
6	SOLEIL 12	135	299	164	LPDC (type of fishery) CHPC (type of vessel)	2014	24200	3968800

7	SOLEIL 51	198	327	129	LPDC (type of fishery) CHPC (type of vessel)	2014	24200	3121800
8	SOLEIL 61	198	327	129	LPDC (type of fishery) CHPC (type of vessel)	2014	24200	3121800
9	SOLEIL 65	191	370	179	LPDC (type of fishery) CHPC (type of vessel)	2014	24200	4331800
10	SOLEIL 66	191	370	179	LPDC (type of fishery) CHPC (type of vessel)	2014	24200	4331800
11	SOLEIL 67	191	370	179	LPDC (type of fishery) CHPC (type of vessel)	2014	24200	4331800
12	SOLEIL 68	191	370	179	LPDC (type of fishery) CHPC (type of vessel)	2014	24200	4331800
	SUM	2202	3944	1742	n/a	n/a	n/a	42156400

D. Fees owed by CNFC to Senegal from 2000 to 2014

	SOLEIL7	SOLEIL8	SOLEIL9	SOLEIL10	SOLEIL11	SOLEIL12	SOLEIL51	SOLEIL61	SOLEIL65	SOLEIL66	SOLEIL67	SOLEIL68	Total (CFA Francs)	
GT declared (most of the year)	193	193	193	193	135	135	198	198	191	191	191	191		
GT declared (special year)								2012&2013 declared 191						
GT from evidence	303	303	303	303	299	299	327	327	370	370	370	370		
GT under-declared	110	110	110	110	164	164	129	129	179	179	179	179		
Year	price(CFA/ GT/year)													
2000	18,000	1,980,000	1,980,000		2,952,000	2,952,000							9,864,000	
2001	18,000	1,980,000	1,980,000	1,980,000	1,980,000	2,952,000	2,952,000						13,824,000	
2002	21,000	2,310,000	2,310,000	2,310,000	2,310,000	3,444,000	3,444,000						16,128,000	
2003	22,000	2,420,000	2,420,000	2,420,000	2,420,000	3,608,000	3,608,000						16,896,000	
2004	23,000													
2005	23,000	2,530,000	2,530,000	2,530,000	2,530,000	3,772,000	3,772,000						17,664,000	
2006	23,000	2,530,000	2,530,000	2,530,000	2,530,000	3,772,000	3,772,000						17,664,000	
2007	24,200	2,662,000	2,662,000	2,662,000	2,662,000	3,968,800	3,968,800						18,585,600	
2008	24,200	2,662,000	2,662,000	2,662,000	2,662,000	3,968,800	3,968,800	3,121,800	3,121,800				24,829,200	
2009	24,200	2,662,000	2,662,000	2,662,000	2,662,000	3,968,800	3,968,800	3,121,800	3,121,800				24,829,200	
2010	24,200	2,662,000	2,662,000	2,662,000	2,662,000	3,968,800	3,968,800	3,121,800	3,121,800	4,331,800	4,331,800	4,331,800	4,331,800	42,156,400
2011	24,200	2,662,000	2,662,000	2,662,000	2,662,000	3,968,800	3,968,800	3,121,800	3,121,800	4,331,800	4,331,800	4,331,800	4,331,800	42,156,400
2012	24,200	2,662,000	2,662,000	2,662,000	2,662,000	3,968,800	3,968,800	3,121,800	3,291,200	4,331,800	4,331,800	4,331,800	4,331,800	42,325,800
2013	24,200	2,662,000	2,662,000	2,662,000	2,662,000	3,968,800	3,968,800	3,121,800	3,291,200	4,331,800	4,331,800	4,331,800	4,331,800	42,325,800
2014	24,200	2,662,000	2,662,000	2,662,000	2,662,000	3,968,800	3,968,800	3,121,800	3,121,800	4,331,800	4,331,800	4,331,800	4,331,800	42,156,400
Total	CFA	33,066,000	35,046,000	35,046,000	33,066,000	52,250,400	52,250,400	21,852,600	22,191,400	21,659,000	21,659,000	21,659,000	21,659,000	371,404,800
	EURO	50,409	53,427	53,427	50,409	79,655	79,655	33,314	33,831	33,019	33,019	33,019	33,019	566,203

E. Fees owed by CNFC to Guinea for 2014

No	Vessel English Name	Declared GT	GT on the evidence	GT discrepancy	License type	License duration	License fee (USD per year per GT)*	Fees owed (USD)
1	JIU YUAN 811	150	293	143	Pois Demersal	01/09 /2014 - 31/12/2014	315	11261.25
2	JIU YUAN 812	150	293	143	Pois Demersal	01/09 /2014 - 31/12/2014	315	11261.25
3	YUE YUAN YU 7	150	290	140	Cephalopodier	01/09 /2014 - 31/12/2014	350	12250
4	YUE YUAN YU 8	150	290	140	Cephalopodier	01/09 /2014 - 31/12/2014	350	12250
5	ZHI JIANG 03	150	299	149	Cephalopodier	01/09 /2014 - 31/12/2014	350	13037.5
6	ZHI JIANG 04	150	299	149	Cephalopodier	01/09 /2014 - 31/12/2014	350	13037.5
7	ZHI JIANG 05	150	342	192	Cephalopodier	01/09 /2014 - 31/12/2014	350	16800
8	ZHI JIANG 06	150	342	192	Cephalopodier	01/09 /2014 - 31/12/2014	350	16800
	SUM	1200	2448	1248	n/a	n/a	n/a	106698

*The monthly license fee was estimated by dividing the annual fee equally for every month.

F. Fees owed by CNFC to Guinea-Bissau for 2014

No	Vessel English Name	Declared GT	GT on the evidence	GT discrepancy	License type	License duration	License fee ⁴⁵	Fees owed (USD)
UNDER-REPORT GT								
1	CNFC 9305	199	290	91	arrasto de peixe e cefalop.	2014/01/01-2014/12/31	174	15834
2	CNFC 9307	199	290	91	arrasto de peixe e cefalop.	2014/01/01-2014/12/31	174	15834
3	CNFC 9308	199	290	91	arrasto de peixe e cefalop.	2014/01/01-2014/12/31	174	15834
4	CNFC 9502	199	290	91	arrasto de peixe e cefalop.	2014/07/01-2014/12/31	n/a	n/a
5	CNFC 9509	198	327	129	arrasto de peixe e cefalop.	2014/07/01-2014/12/31	n/a	n/a
6	CNFC 9510	198	327	129	arrasto de peixe e cefalop.	2014/07/01-2014/12/31	n/a	n/a
7	CNFC 9511	198	327	129	arrasto de peixe e cefalop.	2014/07/01-2014/12/31	n/a	n/a
8	CNFC 9512	198	327	129	arrasto de peixe e cefalop.	2014/07/01-2014/12/31	n/a	n/a
9	HE BEI 801	199	319	120	arrasto de peixe e cefalop.	2014/01/01-2014/12/31	174	20880
10	HE BEI 802	199	319	120	arrasto de peixe e cefalop.	2014/01/01-2014/12/31	174	20880
11	JIU YUAN 811	150	293	143	arrasto de peixe e cefalop.	2014/04/01-2014/09/30	90	12870
12	JIU YUAN 812	150	293	143	arrasto de peixe e cefalop.	2014/07/01-2014/09/30	n/a	n/a
13	YUAN YU 10	190	286	96	arrasto de peixe e cefalop.	2014/01/01-2014/12/31	174	16704
14	YUAN YU 15	192	304	112	arrasto de peixe e cefalop.	2014/01/01-2014/12/31	174	19488
15	YUAN YU 16	192	304	112	arrasto de peixe e cefalop.	2014/01/01-2014/12/31	174	19488
16	YUAN YU 17	192	304	112	arrasto de peixe e cefalop.	2014/01/01-2014/12/31	174	19488
17	YUAN YU 9	190	286	96	arrasto de peixe e cefalop.	2014/01/01-2014/12/31	174	16704
18	YUAN YU 901	243	351.95	108.95	arrasto de peixe e cefalop.	2014/01/01-2014/06/30	174	18957.3
19	YUAN YU 902	243	351.95	108.95	arrasto de peixe e cefalop.	2014/01/01-2014/06/30	174	18957.3
20	YUAN YU 906	175	252.8	77.8	arrasto de peixe e cefalop.	2014/01/01-2014/06/30	174	13537.2
21	YUE YUAN YU 1	190	286	96	arrasto de peixe e cefalop.	2014/01/01-2014/12/31	174	16704
22	YUE YUAN YU 2	190	286	96	arrasto de peixe e cefalop.	2014/01/01-2014/12/31	174	16704
23	YUE YUAN YU 7	150	290	140	arrasto de peixe e cefalop.	2014/07/01-2014/09/30	n/a	n/a
24	YUE YUAN YU 8	150	290	140	arrasto de peixe e cefalop.	2014/07/01-2014/09/30	n/a	n/a
25	ZHI JIANG 03	150	299	149	arrasto de peixe e cefalop.	2014/07/01-2014/09/30	n/a	n/a
26	ZHI JIANG 04	150	299	149	arrasto de peixe e cefalop.	2014/04/01-2014/06/30	90	13410
27	ZHI JIANG 05	150	342	192	arrasto de peixe e cefalop.	2014/07/01-2014/09/30	n/a	n/a
28	ZHI JIANG 06	150	342	192	arrasto de peixe e cefalop.	2014/04/01-2014/06/30	90	17280
29	ZHONG SHUI 9201	196	295	99	arrasto de peixe e cefalop.	2014/01/01-2014/12/31	174	17226
30	ZHONG SHUI 9412	196	299	103	arrasto de peixe e cefalop.	2014/01/01-2014/12/31	174	17922
31	ZHONG SHUI 9418	199	290	91	arrasto de peixe e cefalop.	2014/07/01-2014/12/31	n/a	n/a

⁴⁵ USD per GT per half year or quarter (see Annex 5.3)

32	ZHONG SHUI 9419	199	290	91	arrasto de peixe e cefalop.	2014/07/01-2014/12/31	n/a	n/a
SUM		5973	9740.7	3767.7	n/a	n/a	n/a	344702
GT inconsistency								
33	ZHONG SHUI 9416	199	135	-64	arrasto de peixe e cefalop.	2014/07/01-2014/12/31	n/a	n/a
34	ZHONG SHUI 9417	199	135	-64	arrasto de peixe e cefalop.	2014/01/01-2014/12/31	n/a	n/a
Insufficient data for comparison								
35	CNFC 21	150	n/a	n/a	arrasto de peixe e cefalop	2014/07/01-2014/09/30	n/a	n/a
36	CNFC 22	150	n/a	n/a	arrasto de peixe e cefalop	2014/04/01-2014/09/30	n/a	n/a
37	CNFC 23	150	n/a	n/a	arrasto de peixe e cefalop	2014/04/01-2014/09/30	n/a	n/a
38	CNFC 24	150	n/a	n/a	arrasto de peixe e cefalop	2014/04/01-2014/09/30	n/a	n/a
39	CNFC 9310	150	n/a	n/a	arrasto de peixe e cefalop	2014/04/01-2014/09/30	n/a	n/a
40	CNFC 9311	150	n/a	n/a	arrasto de peixe e cefalop	2014/04/01-2014/09/30	n/a	n/a
41	CNFC 9312	150	n/a	n/a	arrasto de peixe e cefalop	2014/04/01-2014/09/30	n/a	n/a
42	CNFC 9314	150	n/a	n/a	arrasto de peixe e cefalop	2014/04/01-2014/09/30	n/a	n/a
43	CNFC 9702	199	n/a	n/a	arrasto de peixe e cefalop.	2014/01/01-2014/12/31	n/a	n/a
44	HE BEI 803	199	n/a	n/a	arrasto de peixe e cefalop.	2014/01/01-2014/12/31	n/a	n/a
45	PU YU 6009	196	n/a	n/a	arrasto de peixe e cefalop.	2014/01/01-2014/06/30	n/a	n/a
46	PU YU 6010	196	n/a	n/a	arrasto de peixe e cefalop.	2014/01/01-2014/06/30	n/a	n/a
47	ZHONG SHUI 9202	196	n/a	n/a	arrasto de peixe e cefalop.	2014/01/01-2014/12/31	n/a	n/a

From the table above we can calculate and get this result:

- 1) The total GT of the vessels operated in Guinea Bissau during 2014/01/01-2014/03/31, with license type "arrasto de peixe e cefalop. [fish and cephalopods]" is 6235.7
- 2) The total GT of the vessels operated in Guinea Bissau during 2014/04/01-2014/06/30, with license type fish and cephalopods " is 8219.7
- 3) The average total GT of the vessels operated in Guinea Bissau during 2014/01/01-2014/06/30, with license type fish and cephalopods " is 7227.7

However, the fisheries agreement between Guinea Bissau and CNFC, signed on June 28, 2010, allowed CNFC to operate fishing vessels with an annual limit GT of 4883, broken down per type of licenses:

- a) for demersal shrimp: 398 GRT / year
- b) for demersal cephalopods: 2340 GRT / year
- c) for demersal fish: 2145 GRT / year

According to this agreement, the annual GT limit for the vessels targeting fish and cephalopods is 4485 (sum of type b and c). Although the agreement does not explain clearly how to apply the GT limits, we assumed there are two possible ways to interpret this:

- 1) "At any time of the year, the total GT of the fishing vessels should not exceed 4485": From the calculation above, the total GT during 2014/01/01-2014/03/31 is 6235.7, the total GT during 2014/04/01-2014/06/30 is 8219.7, the limit was exceeded in both periods.
- 2) "The total average GT of the fishing vessels should not exceed 4485 in each year": if we adjust the GT limit and real total GT to half year, then the GT limit is 2242.5 and real total GT is 3613.85. The real total GT exceed the GT limit by about 61%.

ANNEX II Evidence

Table A: Reference materials

Database of Ship Profiles					
No.	Name	link			
1	Grosstonnage.com	http://grosstonnage.com/			
2	Lloyd's	http://www.lloydslistintelligence.com/			
3	MarineTraffic.com	http://www.marinetraffic.com/			
List of Licenses from WA country					
No.	Fishing area	Name	crosschecked(Y/N)	referred(Y/N)	Link
4	Ghana	For semi-industrial and industrial fishing vessels, July 2013	Y	Y	http://transparentsea.co/images/6/6e/Ghana_license_list2013.pdf
5	Guinea	2013	Y	Y	http://transparentsea.co/images/c/c6/Guinea_conakry_vessellist2013.pdf
6	Senegal	2012	Y	Y	http://www.dpsp.sn/wp-content/uploads/2012/08/LISTING-NAVIRE-AUTORISES-A-PECHER6.pdf (the webpage is no longer available, the file can be provided on request)
7	Guinea	2014	Y	Y	
8	Guinea Bissau	2014	Y	Y	
9	Senegal	2000-2014	Y	Y	ANNEX I. a
Others					
No.	Name	Link	Remark		
10	Atlas of Chinese Marine Fishing Ships. By Register of Fishing Vessels of the People's Republic of China, the Ministry of Agriculture, and China Fishery Vessels, Machinery and Equipment Association. Oct 2009		N/A		
11	Atlas of Chinese Steel Marine fishing ships. By Aquatic Department of the People's Republic of China, Ministry of Agriculture, and Fishery Machinery Association. 1991		N/A		
12	Register of Fishing Vessels of the People's Republic of China, the Ministry of Agriculture	http://www.cfr.gov.cn			
13	China Vessel Monitoring System (VMS) Yearly/Monthly Report	http://www.cndwf.com/list.php?fid=19			
14	List of establishments from the European Commission Directorate General for Health and Food Safety (SANTE)	https://webgate.ec.europa.eu/sanco/traces/output/non_eu_listsPerCountry_en.htm	List from DG SANTE of vessels/processing plants submitted by third countries declaring to conform to EU hygiene standards. We used this list to identify vessels entitled to export to the EU.		
15	Others: including photos from field research, research on the vessel blue prints, etc.	N/A	Can be provided on request case by case		

ANNEX III International law

• International Convention on Tonnage Measurement of Ships

Adoption: June 23, 1969; Entry into force: July 18, 1982

The rules apply to all ships built on or after July 18, 1982 – the date it came into force – while ships built before that date were allowed to retain their existing tonnage for 12 years after entry into force, or until July 18, 1994.

China, Senegal and Guinea have acceded to the Convention but not Guinea Bissau⁴⁶

	Date of deposit of instrument	Entry into force or accession
China	April 8, 1980	July 18, 1982
Guinea	19 January 1981	18 July 1982
Senegal	16 January 1997	16 April 1997

China is the flag State of vessels operating in Guinea and Guinea Bissau, so China is responsible for applying IMO rules.

Senegal is the flag State of CNFC vessels operating in its waters, so Senegal is responsible for applying IMO rules.

ANNEX IV Relevant legislation in China, Senegal, Guinea and Guinea Bissau

Senegal

1. Fisheries Code 98-32

- Art 17 (a) Access agreements

(a) spécifier le nombre et les **caractéristiques** des navires de pêche autorisés à opérer dans le cadre des accords

[Specify the number and characteristics of fishing vessels authorised to operate in the framework of agreements]

- Art 20 Vessel registry

Le registre contient toutes les informations requises, notamment sur les **caractéristiques** des navires

[The registry contains all the information required, including notably on the characteristics of vessels]

- Art 86 (f) Serious infractions

(f) les fausses déclarations des **spécifications techniques** des navires et notamment celles qui portent sur le **tonnage de jauge brute des navires** autorisés à opérer dans les eaux maritimes sous juridiction sénégalaise

[False declarations of the technical specifications of vessels and notably those concerning the gross tonnage of vessels authorised to operate in waters under Senegal's jurisdiction]

2. Fisheries Decree 98-498

- Art 18 (b) Licence

(b) **caractéristiques techniques** du navire y compris: la date de construction, la longueur hors tout, la largeur, le tirant d'eau, le **tonnage brut et le tonnage net**, la puissance du moteur, le mode de conservation des captures

[Technical specifications of the vessel, including: date of construction, overall length, width, draught, gross and net tonnage, engine power, catch preservation system]

Les tonnages de jauge brute et de jauge nette sont constatés par copies de certificats délivrés par les sociétés de classification agréées par le Ministère chargé de la pêche maritime.

[Gross and net tonnage are verified based on copies of certificates delivered by classification societies accredited by the ministry in charge of maritime fisheries]

- Art 44 Fishing zones based on tonnage

Guinea

1. Fisheries Code L/95/13/CTRN du 15 mai 1995

- Article 12. 1 International agreements and other arrangements for the access of foreign fishing vessels

a) spécifier le nombre ou la capacité des bateaux dont les opérations sont permises aussi bien que les types de pêche et d'espèces dont la capture est autorisée;

[Specify the number or the capacity of vessels whose operations are authorised as well as the type of fishing and species authorised to be caught]

- Article 15. 2 Vessel registry

Le registre contiendra toutes les informations qui seront exigées notamment sur les caractéristiques des bateaux et leurs opérations dans les eaux maritimes guinéennes.

[The registry will contain all the information requested, including on the specifications of vessels and their operations in Guinea maritime waters]

2. Décret D 97/227/PRG/SGG du 15 Octobre 1997

- Article 7 License

Le Ministre chargé des pêches peut exiger des renseignements qui peuvent être raisonnablement considérés comme pertinents;

Des **spécifications techniques concernant les mesures de tonnage de jauge brute** acceptées par le service compétent du Ministère chargé de la pêche,

[The minister in charge of fisheries can request information that can be reasonably considered as relevant such as: technical specifications concerning the gross tonnage measurements accepted by the relevant service of the fisheries ministry]

Une déclaration solennelle attestant l'exactitude de la demande ou des renseignements fournis;

[A solemn declaration testifying the accuracy of the demand or the information provided]

3. Décret 027 portant détermination des amendes et pénalités accessoires applicables aux infractions de pêche 1er Mars 2012

- Article 7 (l)

Les fausses déclarations des spécifications techniques des navires et notamment celles qui portent sur le tonnage de jauge brut des navires autorisés à opérer dans les eaux maritimes de la République de Guinée;

[False declarations on the technical specifications of vessels and notably those concerning the gross tonnage of vessels authorised to operate in the maritime waters of the Republic of Guinea]

Guinea Bissau

General fisheries legislation Decreto Lei n° 10/2011

- Art 12 Fishing vessel registry

3. O registo das embarcações de pesca deverá especificar todas as informações e dados necessários sobre, nomeadamente:

a) As embarcações, designadamente, o nome, o porto e o número de matrícula, especificações ou características técnicas, proprietário e demais informações julgadas úteis

[The fishing vessel registry shall specify all the information and data necessary namely:

a) [Vessels, notably, the name, the port and registration number, technical specifications or characteristics, the owner and any information considered useful]

- Art 14 Access agreements

a) Especificar o número e as características técnicas das embarcações de pesca a operar no âmbito do acordo ou contrato de pesca, bem como o tipo de pesca, as espécies e a captura autorizada;

[Specify the number and technical specifications of the fishing vessels operating under the framework of the fishing agreement or contract, as well as the type of fishing, species and catch authorised]

- Art 61.1 Infractions and sanctions

Any violation of provisions of this law

- Art 64 (g) Serious infractions

⁴⁶ <http://www.imo.org/About/Conventions/StatusOfConventions/Pages/Default.aspx>

g) A apresentação de informações, dados e documentos falsos sobre as especificações técnicas das embarcações de pesca autorizadas a operar nas águas sob jurisdição nacional, nomeadamente, sobre a tonelagem bruta;
The presentation of false information, data, and documents on the technical specifications of the fishing vessels authorised to operate in the waters under the national jurisdiction, notably the gross tonnage]

China

Regulations of the People's Republic of China on Survey of Fishery Vessels

(Adopted at the 11th Executive Meeting of the State Council on June 11, 2002, promulgated by Decree No. 383 of the State Council of the People's Republic of China on June 27, 2003, and effective as of August 1, 2003)

Article 11

The fishery vessel survey agency shall, within five working days from the date of completion of the survey, issue the fishery vessel survey certificate to the fishery vessel that passes the survey; where the fishery vessel fails to pass the survey, the fishery vessel survey agency shall notify the party in writing and give the reasons therefor.

No unit or individual may alter without authorization the tonnage, load line, main engine power, personnel quota and navigable area of a fishery vessel that passes the survey, nor may such unit or individual remove without authorization its critical equipment or components related to safety of navigation, operation, life and property as well as prevention of environmental pollution. Where there is a real need for alteration or removal, such alteration or removal shall be approved by the original fishery vessel survey agency.

Article 34

Where, in violation of these Regulations, anyone commits any of the following acts, he shall be ordered to make immediate corrections and be imposed a fine of not less than 2,000 yuan but not more than 20,000 yuan; if the fishery vessel involved is being operated, it shall be ordered to cease operation immediately; in case of refusal to make corrections or cease operation, the critical equipment, components and materials illegally used shall be compulsorily removed, or the fishery vessel survey certificate of the fishery vessel involved shall be suspended. If a crime is committed, the criminal liability shall be investigated according to law:

(1) using the critical equipment, components and materials related to safety of navigation, operation, life and property as well as prevention of environmental pollution, which fail to pass the survey, to construct, adapt, or repair a fishery vessel;

(2) removing without authorization the critical equipment or components related to safety of navigation, operation, life and property as well as prevention of environmental pollution onboard a fishery vessel;

(3) altering without authorization the tonnage, load line, main engine power, personnel quota or navigable area of a fishery vessel.

ANNEX V

CNFC: General introduction

CNFC⁴⁷ is China's largest distant water fishing company, and the biggest Chinese fishing company operating in West Africa. Heavily subsidised by the government, it is also the only fishing company that is directly overseen by the State-owned Assets Supervision and Administration Commission of the State Council (SASAC). Until 2013, CNFC operated 345 distant water fishing vessels, equivalent to about 16% of all Chinese distant water fishing vessels. They represent a total power of 277,625 kilowatts (18% of China's total) and with reported catches of 225,000 tons (17% of China's total).⁴⁸ It has the biggest and most widely-scattered fleet of all Chinese fishing companies, and has at least 20 wholly-owned or joint ventures in Asia, Europe, Africa, and South America. Currently, CNFC is engaged in fishing, processing and sales in 10 African countries with more than 160 of its own vessels, accounting for about 35% of the vessels owned by Chinese companies in the region.

ANNEX VI

Fishing license fees in Senegal, Guinea and Guinea Bissau and GT limits in Guinea Bissau

1. Senegal

- 1987: 8.000 francs CFA/GT/year

Based on an official source, the license fee did not change until 2000

- 2000: 18,000 francs CFA/GT/year

- 2001: 18,000 francs CFA/GT/year

- 2002: 21,000 francs CFA/GT/year

- 2003: 22,000 francs CFA/GT/year

- 2004: 23,000 francs CFA/GT/year

- 2005: 23,000 francs CFA/GT/year

- 2006: 23,000 francs CFA/GT/year

- 2007: 24,200 francs CFA/GT/year

- 2008 to 2013: 24,200 francs CFA/GT/year

2. Guinea

According to Guinea's Fisheries Development and Management Plan 2014,⁴⁹ for industrial freezer trawlers, the license fee is as below (US\$/GT/year):

Vessel status	Deep sea fishing vessel	Cephalopoder	Shrimper	Demersal fishing
Guinean	280	350	430	315
Foreign based in Guinea	500	350	430	315
Foreign	500	350	430	315

3. Guinea Bissau

According to the Protocol of the Fisheries Agreement between CNFC and the government of Guinea Bissau

Article 1

With effect from July 1, 2010, and for a period of four (4) years, the annual limits of the fishing opportunities set out in this protocol are the following:

a) for demersal shrimp: 398 GRT / year

b) for demersal cephalopods: 2340 GRT / year

c) for demersal fish: 2145 GRT / year

Annex of the agreement, Article 1.3:

⁴⁷ CNFC was founded in 1984 by merging three companies owned by Ministry of Agriculture. In October 2004, as part of a restructuring, CNFC and the China Animal Husbandry Group established China National Agricultural Development Group (CNADC). Currently, CNADC is an agricultural enterprise directly controlled by the State-owned Assets Supervision and Administration Commission of the State Council (SASAC). For the purposes of convenience, in this report CNADC's subsidiaries and holding fishing companies (including China National Fisheries Corp, CNFC Overseas Fisheries Co.Ltd, CNFC Zhoushan Marine Fisheries Corp, CNFC Yantai Marine Fisheries Company Ltd and Zhongyu Global Seafood Co.Ltd) are collectively referred to by using its most recognised English name: China National Fishery Corp. (CNFC).

⁴⁸ Report on the development of China's distant water fishing companies, Fisheries Bureau, Ministry of Agriculture, China, 2014

⁴⁹ http://esp-las.mofa.go.kr/webmodule/common/download.jsp?boardid=8332&tablename=TYPE_LEGATION&seqno=fef85ffd013fa9fec04f009&fileseq=fdbfd77ba06f07b05a01a06d

Guinea Bissau and CNFC negotiated the following license fees under the fisheries agreement:

	Fish(USD/GT/year)	Cephalopod(USD/GT/year)	Shrimp(USD/GT/year)
Annual license	315	341	420
Semi-annual license	163	174	216
Quarterly license	84	90	110

GREENPEACE

RSA Office:

10A and 10B Clamart House, Clamart Road, Richmond, Johannesburg, South Africa

Postal address:

Greenpeace Africa, PostNet Suite 125, Private Bag X09 Melville, Johannesburg, 2109, South Africa

DRC Office:

Greenpeace Environnemental Organisation N°11, avenue Kauka/Quartier le Royal Commune de la Gombe, Kinshasa/RDC

Senegal Office:

2, Avenue Hassan II, 6eme etage, Dakar, Senegal

iafrica@greenpeace.org
www.greenpeaceafrica.org

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Greenpeace is an independent global campaigning organisation that acts to change attitudes and behavior, to protect and conserve the environment and to promote peace. It comprises of 28 independent national/regional offices in over 40 countries across Europe, the Americas, Asia, the Pacific and Africa as well as a coordinating body, Greenpeace International.

Greenpeace has been working in Africa to end environmental destruction and fighting for the right of Africans to a healthy environment since the early 1990s. Our campaigns focus on climate change, halting the destruction of tropical forests, supporting ecological farming and preventing the degradation of marine ecosystems.

