DOCUMENT VERIFICATION MANUAL
FOR FISHERIES ENFORCEMENT

VESSEL IDENTITY
The practice of under or misreporting catches, for example by using false catch logs and catch certificates, to bypass catch restrictions, underpay related fees, falsify hygiene reports, and to mislabel species are well documented.

However, there is little written about vessel identity fraud and how this widespread fisheries crime is facilitated by document forgery. In 2018, INTERPOL warned about resurgence in fraudulent abuse of flag State registries for fishing vessels, which confirmed what had been observed along the coasts of Africa and internationally in the past years.

This manual focuses on vessel identity – nationality, authorisation status, operational history, etc. – and related fraudulent practices, and primarily looks into what a vessel “says” about itself, rather than what the catch “says”. Because of this vessel-centric approach, the manual does not address other forms of document fraud related to the catch.

It is however important to note that the handling of the catch itself is also prone to ‘identity fraud’, in particular transhipment and port landing operations where false documents may be used to cover the illegal origin of the fish in order to gain access to port and markets. The boundary between vessel identity fraud and catch identity fraud can be very thin.


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Cover photo: © Sea Shepherd. The STS-50 being pursued by Sea Shepherd after absconding from Mozambique, where it was under investigation. The STS-50 was eventually arrested by the Indonesian Navy.
# DOCUMENT VERIFICATION MANUAL
FOR FISHERIES ENFORCEMENT

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Documents carried onboard a fishing vessel may provide information about the vessel’s identity, registration, physical characteristics, what activities it is permitted to engage in and where, and whether it has been certified as compliant with required safety regulations.

However, documents can be altered, replicated or obtained by illegal means, making them false, so it is essential that vessel documents are systematically verified as part of the fisheries monitoring, control and surveillance (MCS) process.

False documents are used in an attempt to hide illegal activities or to avoid obligations and costs. False vessel registration certificates, fishing licences or catch certificates are a key element in many cases of illegal fishing, as illegal operators either alter existing documents or create forged documents.

The use of the words ‘false’, ‘forgery’, ‘fake’, and ‘fraud’ can be used to indicate different activities or to imply something about the motives behind the activity. These terms can quickly become muddled in everyday use and especially when translated into other languages. In this manual ‘false’ is used as a broad term that encompasses all these terms – more detail is given in the table on Page 8.
Common reasons for using false documents

- **Conceal the true identity of a vessel**, for example, to cover up a history of illegal activity or unpaid fees, a vessel owner may falsify its identity when seeking port access, registration or licensing by using false documents.

- **Avoid complying with safety regulations**, for example, false certificates may be used to conceal that a vessel has not passed safety inspections; for example, safety equipment may be out of date or not suitable for the vessel size or type.

- **Avoid or underpay fees**, for example, the cost of vessel registration, licensing, port access and other services is often linked to vessel capacity or size, with vessels in a larger tonnage or length category paying more.

- **Gain illegal access to resources or services**, for example, inshore fisheries waters may be reserved for smaller vessels, or authorisation to tranship may be granted only to vessels of a certain type or carrying a certain fishing licence.

- **Gain additional benefits**, for example when a vessel registers with one flag State obtaining genuine documents, whilst remaining registered with a second flag State, this may secure access to benefits available to each flag State, for example, access to subsidies under one flag, and fisheries access under the other.
Vessels carry many types of documents, issued by a number of different authorities. Key documents include:

<table>
<thead>
<tr>
<th>Document type</th>
<th>Purpose</th>
<th>Issuing authority</th>
<th>Risk factors</th>
</tr>
</thead>
<tbody>
<tr>
<td>Registration certificate</td>
<td>Vessel identification document conferring nationality on a vessel.</td>
<td>Flag State</td>
<td>This is a breeder document often used by illegal operators to obtain (or breed) new documents such as authorisations or safety documents.</td>
</tr>
<tr>
<td>Classification certificate</td>
<td>Confirming the class to which a vessel is assigned, which defines its permitted uses and determines which certifications it must hold and which survey regime it must comply with.</td>
<td>Flag State, issued by a classification society</td>
<td>Used to obtain the registration certificate so if used falsely will result in a false registration certificate.</td>
</tr>
<tr>
<td>Tonnage certificate</td>
<td>Certifies a vessels’ dimensions and gross/net tonnage as determined by a surveyor.</td>
<td>Flag State or authorised certification body</td>
<td>Adjusting tonnage is a common element of fraudulent activity to allow access to fish, transhipment or to reduce costs.</td>
</tr>
</tbody>
</table>
| Flag State fishing authorisation | A vessel must be authorised to fish by its flag State. Authorisations should:  
  • Specify where a vessel is authorised to fish and may indicate allowable gear type or target species.  
  • Specify if a vessel may fish in ABNJ  
  • Specify authorisation to fish under an RFMO regime. | Flag State | Assumption that if a vessel is listed on an RFMO list as authorised that means that the flag State has conducted adequate due diligence, which may not be the case. There is often no authorisation document per se, and renewal certificates are often faxed to vessels at sea, making it difficult to ascertain the validity of the document. |
<table>
<thead>
<tr>
<th>Document type</th>
<th>Purpose</th>
<th>Issuing authority</th>
<th>Risk factors</th>
</tr>
</thead>
<tbody>
<tr>
<td>Coastal State fishing authorisation</td>
<td>A vessel must be authorised to fish in national waters, whether it is fishing in the EEZ of its flag State or a third country. Allowable gear type and target species, and any prohibited areas will be noted on the licence.</td>
<td>Coastal State</td>
<td>Can be forged or doctored to cover up illegal fishing. Photocopies are often carried onboard instead of originals, making it difficult to ascertain validity.</td>
</tr>
<tr>
<td>Transhipment authorisation</td>
<td>Issued to fishing vessels or reefer vessels to engage in at-sea transhipment, generally either in the framework of RFMO transhipment programmes or under the jurisdiction of a coastal State.</td>
<td>Flag State, Coastal State, RFMO</td>
<td>Can be a generic authorisation to operate in a transhipment programme, or limited to a single transhipment operation – the latter is prone to forgery for reuse.</td>
</tr>
<tr>
<td>Radio licence</td>
<td>Required for all vessels that carry a marine radio and have been issued radio identifiers by their flag State.</td>
<td>Flag State</td>
<td>Can be forged or doctored to present a fake call sign and MMSI number in an attempt to legitimize their use in radio communications. Some vessels hold on to their previous identifiers for communications even after a flag change.</td>
</tr>
<tr>
<td>Safety certificate</td>
<td>Examples include: • Fishing Vessel Safety Certificate • Fishing Vessel Safety Radio Certificate • Ship Safety Equipment Certificate.</td>
<td>Flag State, issued by a classification society</td>
<td>The use of fake safety certificates is a common element in fisheries crime cases, with vessel operators trying to hide unseaworthiness or dangerous working conditions.</td>
</tr>
</tbody>
</table>
Types of false documents

False documents can take a number of forms, and it is important that the verification process is designed to detect all of these:

<table>
<thead>
<tr>
<th>Type of document</th>
<th>Description</th>
<th>Language used for this type of document</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document obtained by deception</td>
<td>A document obtained by providing incorrect information or other fake documents/certificates.</td>
<td>Fraud False</td>
</tr>
<tr>
<td>Document obtained by corruption</td>
<td>Utilising corrupt officials to obtain a genuine document without complying with all the requirements.</td>
<td>Fraud False</td>
</tr>
<tr>
<td>Incorrectly used document</td>
<td>A genuine document that is used incorrectly, such as being used for the wrong vessel or using the wrong crew documents.</td>
<td>Fraud False</td>
</tr>
<tr>
<td>Doctored document</td>
<td>A genuine document where some information has been changed.</td>
<td>False Tampered Altered</td>
</tr>
<tr>
<td>Adjusted copy of a document</td>
<td>A copy of a genuine document where some of the content has been changed.</td>
<td>Forged Fake False</td>
</tr>
<tr>
<td>Reproduced document</td>
<td>Replica/manufactured document that is totally false - may or may not be based on the template of a genuine document.</td>
<td>Forged Fake False</td>
</tr>
<tr>
<td>Incorrectly used copy of genuine document</td>
<td>A copy of a genuine document that is used incorrectly such as being used for the wrong vessel.</td>
<td>Fraud Fake False</td>
</tr>
</tbody>
</table>
Vessel identity fraud is used to hide fishing and operational history and activity, reduce costs, misinform and confuse licensing, flagging and inspection authorities, cover up a history of IUU fishing, and evade sanctions when caught violating regulations or breaking laws.

Three main forms of vessel identity fraud are commonly seen, either alone or in combination:

- A vessel may use a genuine identity of another vessel, which results in two or more vessels using the same identity simultaneously – and cases have been detected involving up to five vessels using one identity.
- A single vessel may utilise more than one identity, appearing under different names, flags etc. in different jurisdictions and records.
- A vessel may use a new identity that has not been registered with any national authority.

Identity fraud can enable a vessel to operate illegally under the cover of a legal and authorised vessel’s identity – for example, a vessel operator might purchase one legal fishing licence which is used by the vessel named on the licence and several other vessels that assume its identity.

Vessel identity fraud relies on the use of false documents, as well as changes to physical vessel appearance. In addition to verifying documents, inspectors should look for signs that a vessel’s name, call sign and other identifiers have recently been repainted or altered. It is also important to check that any historic name or other identifiers visible under paint on the hull match the name history of the current vessel identity – this can be done through verification with the flag State and using sources such as RFMO authorised vessel lists.

Use of vessel photographs is an important tool to detect identity fraud – for more information on the use and systematic collection of vessel photographs to support fisheries MCS, see the Photo Manual for Fisheries Enforcement.
Verification of documents relating to fishing vessels is a key component of fisheries MCS. Documents should be checked and verified when:

- A fishing vessel is inspected during at sea or in port inspections.
- A fishing vessel operator provides documents to an authority, as often required for example to obtain a fishing licence.

Key points for verification are:

<table>
<thead>
<tr>
<th>When</th>
<th>Key documents</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Flag States</strong></td>
<td>• Registration certificate.</td>
</tr>
<tr>
<td>• Applications for registration.</td>
<td>• Classification certificate.</td>
</tr>
<tr>
<td>• Applications for transhipment.</td>
<td>• Tonnage certificate.</td>
</tr>
<tr>
<td>• Issuing of catch certificates.</td>
<td>• ABNJ or RFMO fishing authorisation.</td>
</tr>
<tr>
<td>• Application to fish in ABNJ or</td>
<td>• EEZ fishing authorisation.</td>
</tr>
<tr>
<td>within RFMO areas.</td>
<td>• Transhipment authorisation.</td>
</tr>
<tr>
<td>• Inspections of vessels.</td>
<td>• Safety certificate.</td>
</tr>
<tr>
<td>• Requests for entry into port.</td>
<td>• Catch certificate.</td>
</tr>
<tr>
<td>• Inspections for PSM or</td>
<td></td>
</tr>
<tr>
<td>offloading.</td>
<td></td>
</tr>
<tr>
<td><strong>Coastal States</strong></td>
<td>• Registration certificate.</td>
</tr>
<tr>
<td>• Application for a fishing licence.</td>
<td>• Classification certificate.</td>
</tr>
<tr>
<td>• Application for transhipment.</td>
<td>• Tonnage certificate.</td>
</tr>
<tr>
<td>• Inspections including pre and</td>
<td>• ABNJ fishing authorisation.</td>
</tr>
<tr>
<td>post fishing and at-sea.</td>
<td>• EEZ fishing authorisation.</td>
</tr>
<tr>
<td>• Radio licence.</td>
<td>• Transhipment authorisation.</td>
</tr>
<tr>
<td>• Safety certificate.</td>
<td>• Catch certificate.</td>
</tr>
<tr>
<td><strong>Port States</strong></td>
<td>• Registration certificate.</td>
</tr>
<tr>
<td>• Assessing catch certificates.</td>
<td>• ABNJ or RFMO fishing authorisation.</td>
</tr>
<tr>
<td>• Inspections of imports.</td>
<td>• EEZ fishing authorisation.</td>
</tr>
<tr>
<td>• Transhipment authorisation.</td>
<td>• Safety certificate.</td>
</tr>
<tr>
<td>• Catch certificate.</td>
<td></td>
</tr>
<tr>
<td><strong>Market States</strong></td>
<td>• Registration certificate.</td>
</tr>
<tr>
<td>• Assessing catch certificates.</td>
<td>• ABNJ or RFMO fishing authorisation.</td>
</tr>
<tr>
<td>• Inspections of imports.</td>
<td>• EEZ fishing authorisation.</td>
</tr>
<tr>
<td>• Transhipment authorisation.</td>
<td>• Safety certificate.</td>
</tr>
<tr>
<td>• Catch certificate.</td>
<td></td>
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</tbody>
</table>
Using a risk-based approach

With limited time and resources it may not be feasible to conduct a full verification process for every document. For this reason, it is recommended to apply a risk-based approach, similar to that used to determine allocation of inspection resources.

A risk assessment procedure will identify high-risk vessels based on flag State, flagging history, compliance history, recent operations, ownership and other relevant factors.

Visual analysis of documents and basic crosschecking of information should be a standard part of the risk assessment process. Vessels identified as high risk, based either on the initial document analysis or other factors should be subject to the full document verification process.

If it is feasible to incorporate document checks with the issuing authorities into all routine procedures, such as licence application and registration procedures, this should be done as standard.
Forged documents vary significantly in quality – some have little resemblance to the genuine document, with clear variations in format, stamp, signature and issuing authority. In other cases, vessels may use high quality forgeries that cannot be detected by simple visual analysis.

There are three main approaches to verification of documents:

- Visual analysis
- Cross-referencing of information
- Verification by issuing authorities

To be effective and maximise the likelihood of detecting forged documents, MCS regimes must incorporate all three approaches to the verification of documents.
Visual examination of a document can reveal signs that it may have been doctored or is not genuine.

Checklist

- Typeface — are there variations in font, font size, ink type or colour?
- Altered text — are smudging and unclear characters evident?
- Stamp — each stamp has its own ‘fingerprint’, with cracks or worn areas that are reproduced when used. Does the document stamp have the same ‘fingerprint’ as is seen on genuine documents?
- Serial number — does the serial number coincide with the serial numbers of other, genuine licences issued around the same time period, or is it much higher or lower than expected?
- Paper — some authorities use a specific type of paper when issuing documents, is the paper similar to other genuine documents?
- Signature — do the name and signature match those found on other, genuine documents?
- Spelling mistakes — typos and errors in spelling or official names can indicate forgery, is this evident?
- Formatting — check to see if there are any inconsistencies in colour and quality?
- Security Features — are known security features such as watermarks or holograms present and correct?

Computer software can help check whether PDF documents have been altered. In some forged documents you may be able to see the areas that have been over-written in the form of extra ‘objects’.
Comparison with genuine documents

Visual analysis should also include comparison with examples of genuine documents, to identify any variations in template or format. Examples of genuine documents may be obtained on request from issuing authorities, such as flag States.

Some initiatives for systematic sharing of document formats already exist:

• The Indian Ocean Tuna Commission (IOTC) maintains an online repository of official document examples, submitted by its Member States, which are accessible to other IOTC members.
• Countries participating in regional Task Forces such as FISH-i Africa and the West Africa Task Force share vessel documents on an ongoing basis and fisheries inspectors from these countries can easily access templates and specimens.

Security features for documents

Technology to prevent document forgery is improving all the time and many authorities now include additional authentication and anti-counterfeiting features on documents, which are difficult to forge. Of course, these measures are only effective if documents are being verified and the checking authorities know what to look for.

Security features on documents can include:

• Hologram stamps.
• Security paper.
• Watermarks.
• Micro text – text that is so small it is invisible to the naked eye, which is difficult for counterfeiters to replicate.
• Barcodes or QR codes – contact the issuing authority for information on how to read and verify these.
• Magnetic ink.
Crosschecking with vessel characteristics

The information contained in a document should be crosschecked with the vessel’s visible characteristics. Inconsistencies with information presented in documents may reveal document forgery and/or identity fraud.

Checklist

- Look for any inconsistencies between physical characteristics and vessel particulars, such as those presented in registration documents.
  - Vessel dimensions.
  - Vessel gear type.
  - Vessel age.
- Compare visible markings with vessel identifiers presented in documents.
  - International Maritime Organization (IMO) number.
  - National registration number.
  - International radio call sign (IRCS).
  - Fishing authorisation numbers.
- Look for temporary markings or recent changes.
  - Vessel name on a removable board.
  - Signs of tampering.
  - Misspelling of vessel name.
  - Recent painting of vessel name, part of name and other identifiers.
  - Different vessel names on e.g. life buoys.
- Compare name and Maritime Mobile Service Identity (MMSI) number presented in documents with the vessel details being broadcast on Automatic Identification System (AIS) at the time of inspection (and historically, if possible).
- Conduct photo analysis using historic vessel images (see Photo Manual for Fisheries Enforcement).
Crosschecking with vessel documents

Discrepancies between sources can also indicate that a vessel is using forged documents.

Checklist

- Check the vessel’s identifiers (name, IMO, IRCS, national registration number, licence number) across documents and against available external sources – such as RFMO authorised vessel lists.
- Check the vessel’s declared tonnage against tonnage information recorded on other certificates and in other sources, such as RFMO authorised vessel lists.
- Compare the documents against previously submitted documents (such as previous licence applications) as the vessel may have altered its declared tonnage over time.
- Check specific areas where discrepancies between documents or with other sources can help to identify document forgery, such as:
  - Year and place of build.
  - Physical characteristics such as tonnage, length and breadth.
  - Engine details.
  - Historic names.
  - Previous flags.
- Check that the document chronology makes sense, e.g. if a document was issued following a vessel inspection in port on 25 November 2018 but AIS or Vessel Monitoring System (VMS) indicates that the vessel was in a different location on that date, this could indicate a false document.
- Check a vessel’s details against external vessel databases as this may indicate a false (not registered) identity or dual registration.
Crosschecking IMO numbers

The International Maritime Organization (IMO) number scheme is a global identification scheme for ships, designed to prevent fraud and enhance safety and security. An IMO number is a unique, seven digit number that is allocated to one vessel and stays with that vessel through its lifespan, regardless of name or flag changes. Use of an IMO number makes it harder for vessels to evade detection simply by changing name and flag, as the vessel’s historic identity is tied to its IMO number.

Increasingly, flag, port and coastal States are requiring eligible vessels to have an IMO number in order to register, enter port or acquire a licence. In addition, the majority of RFMOs now require eligible vessels that are authorised to operate in their fishery to have an IMO number.

Vessel registration and most authorisation documents include the vessel’s IMO number – this is one of the first things that should be checked as part of the crosschecking process. Checking the IMO number against vessel databases, including most RFMO authorised vessel lists, should show any historic identities of the vessel. If these do not match past identities visible on the vessel’s hull, or in other documents, this should be investigated further.

Currently IMO numbers do not have to be embossed or otherwise permanently marked on the vessel. This means they are still open to forgery or being used by multiple vessels.

Just because vessel documents include an IMO number does not mean they are genuine – IMO number information can be forged, as can vessel name, call sign and other identifiers. Equally, a vessel with a history of illegal activity may leave its IMO number off documents in an attempt to conceal its past behaviour.

Due in large part to RFMO IMO number requirements and end-market interest, an increasing proportion of industrial fishing vessels now carry an IMO number. If an eligible vessel, particularly one that is operating in an RFMO fishery, presents documents that do not include an IMO number, it is recommended to check against relevant databases and with the flag State to confirm whether the vessel has an IMO number or not.
Crosschecking with external sources

There are many online sources of information relating to fishing vessel identity and registration.

**Useful sites include:**

**RFMO authorised vessel lists** contain details of all RFMO authorised vessels, including fishing vessels and reefers. Details provided vary but often include vessel identifiers, gear type, vessel characteristics, year of build. Historic information may also be provided. Available on RFMO websites.

**Consolidated List of Authorised Vessels (CLAV)** is a global list of authorized tuna fishing vessels. Updated daily it represents a dynamic snapshot of the tuna RFMO authorized vessel lists. Individual RFMO web sites should be consulted for their definitive lists.

http://clav.iotc.org

**The Global Record of Fishing Vessels, Refrigerated Transport Vessels and Supply Vessels** (Global Record) is a collaborative global initiative to make available certified data from State authorities about vessels and vessel-related activities.


**International Maritime Organization (IMO) Global Integrated Shipping Information System (GISIS)** contains information on vessels, and in 2019 is planning development of a contact database for vessel registries.

https://gisis.imo.org

**RFMO IUU vessel lists.** Links to the RFMO IUU listed vessels can be accessed from the Food and Agriculture Organization (FAO) maintained list.


**The Combined IUU list**, maintained by Trygg Mat Tracking, provides the best available, up to date information on all vessels that appear on the lists of IUU fishing vessels published by RFMOs and fishing vessels that have been subject to an INTERPOL Purple Notice.

https://iuu-vessels.org
**MarineTraffic** provides information on the movements of ships and the current location of ships in harbours and ports, based on AIS data. A database of unverified (and therefore not always reliable) information on the vessels includes dimensions of the vessels, gross tonnage and IMO number. It also provides access to user submitted photographs of vessels that can be useful for crosschecking purposes.

https://www.marinetraffic.com

**IHS SeaWeb** is a subscription-based database of verified information on ships, companies, builders, ports, and vessel movements. IHS is the sole global issuing body of the IMO ship, company and registered owner numbering system.

https://maritime.ihs.com

**Shipspotting.com** provides access to user contributed images of ships. This can provide a useful resource to verify vessel identity and characteristics.

http://shipspotting.com
Crosschecking with regional information sharing mechanisms

Operational cooperation to develop open channels of communication and information exchange can be established through regional information sharing mechanisms. This can take place through regional intergovernmental processes such as regional fisheries bodies, regional information centres, regional MCS centres, or through regional Task Forces.

**Regional Task Forces, bringing together groups of neighbouring coastal States, such as the FISH-i Africa Task Force and the West Africa Task Force, are able to:**

- Establish routine sharing of information.
- Develop combined lists of vessels licensed to operate in the region.
- Request information on vessels and verification of documents.

This model of sharing information is now also being utilised by some port States, and has been developed alongside efforts to implement the Port State Measures Agreement.

**Port State Task Forces are able to:**

- Share information between national agencies ahead of the vessel’s entry into port.
- Crosscheck document information linked to vessel identity, authorisation and activity.

Technical expertise and support, provided by Stop Illegal Fishing and Trygg Mat Tracking, can be accessed through Task Force membership, enabling access to a team of specialist analysts, databases and subscription based services.

If routine due diligence requests indicate a history or suspicion of non-compliance full intelligence reports may be requested to establish what action is best taken at national and regional level.

Greater transparency is achieved by sharing information requests and due diligence reports through Task Force communication portals.
High-quality forgeries may not be detectable by visual analysis or cross-referencing, and these methods may be ineffective to detect genuine documents that have been obtained through unofficial channels.

In order to maximise the likelihood of detecting all types of false documents, verification of documents by the issuing authorities is key. Checking the status of a document with the issuing authorities is the most effective way to verify that a document is genuine.

In addition to confirming whether a document is genuine or not, authorities should also be able to determine whether it was obtained through official channels. In this way verification of documents is important to help issuing authorities identify corrupt practices that may result in invalid documents being issued.
Communication with issuing authorities

Most industrial fishing vessels operate transnationally, and it is not uncommon for a vessel to be flagged in one country, the owner located in another country, the fish caught in a third country and landed in a fourth. Given the transnational nature of industrial fishing operations, it is essential that authorities have the ability to quickly and easily request information, including verification of documents, from authorities in other countries.

Communication channels should exist at an operational level, removing the need to use diplomatic channels, which can be time consuming.

RFMOs often offer a fast and effective way to communicate with other countries that are also party to the RFMO. Multi-lateral or regional cooperation, as demonstrated by the FISH-i Africa and West Africa Task Forces, can also be an efficient way to build communication channels with a number of key States.
Flag State
- registration applications

When false documents are identified the State where the registration application has been submitted will inform:

- Relevant national agencies such as police, port authorities and fisheries.
- Regional Task Forces such as the FISH-i Africa and West Africa Task Force.
- Any relevant RFMO.
- The previous flag State of the vessel.

Coastal State
- fishing licence applications

When false documents are identified the coastal State will inform:

- Relevant national agencies such as maritime authorities, port authorities and police.
- Neighbouring coastal States.
- Regional Task Forces such as the FISH-i Africa and West Africa Task Force.
- Any relevant RFMO.
- The flag State of the vessel.

Port State
- port entry requests

When false documents are identified the port State will inform:

- Relevant national agencies such as fisheries, navy or coastguard and marine police.
- Neighbouring port States.
- Regional Task Forces such as the FISH-i Africa and West Africa Task Force.
- Any relevant RFMO.
- The flag State of the vessel.

WHAT TO DO WHEN A FALSE DOCUMENT IS FOUND
Informing relevant national agencies will allow fisheries authorities to:

- Get additional forensic and judicial support.
- Secure the vessel.
- Investigate other areas where the vessel may not be compliant.

Reaching out to relevant States and organizations will allow fisheries authorities to:

- Provide a broader picture of the vessel’s previous operations
-Warn other countries of the risk associated with the vessel
- Request international support for investigation

Depending on the gravity of the forgery, and the potential crimes facilitated through it, immediate action will vary - from denying the vessel’s current application to detaining the vessel in port while investigations are ongoing and prosecution is conducted.
PHOTOGRAPHING AND COPYING DOCUMENTS FOR USE AS EVIDENCE

Copies or photographs of documents, equipment, and vessel identifiers on board fishing vessels are useful to keep on record, and they may be used as evidence in an investigation and prosecution of a vessel involved in illegal activities, or as a reference for future document verification.

Equipment

This could include instruments on the bridge, laptops and other electronics, safety equipment, and similar. Screens of equipment can be captured with relevant information as well.

Documents

A camera can be used to take ‘copies’ of documents and log books. It can be difficult to focus on individual documents, but it is crucial to ensure that all photos are in focus so that they can be clearly read later. Take several photos of each document to ensure that this is achieved. You may have to switch the flash on or off to achieve this, depending on the light conditions.

© NFDS/DUNCAN COPELAND
Labelling

Where possible it is good practice to place a marker in a photo that provides a physical reference point. INTERPOL have developed a useful tool that can be used for this purpose (see photo). This provides not only a handy scale for the photo, but also allows the date and other information to be written in by hand to provide a reference point. This reduces the risk of any legal challenge to the information contained in the photo.

However even if you do not have a tool such as this, it is still useful to use a reference point in the photo. For example, you can use the same pen in a series of photos, which will provide a common scale reference.

Checklist

- All documents relevant to vessel registration and ownership, both current and historical.
- All relevant pages of the fishing log, navigation log and/or freezer log books.
- Licences and authorisations.
- Any other paperwork of relevance to fishing operations and landings.
- Crew list and senior officers’ passports.
- All relevant navigational equipment – AIS, VMS Mobile Transceiver Unit, GPS, radar, FAD monitoring equipment etc.
- Any other equipment of interest, for example Captain’s laptop.
- Paper charts if they show operational areas.
CASE STUDY

NEW BAI I 168

Forged registration document

2015: While sailing under a provisional registration certificate issued by Liberia, the NEW BAI I 168 was inspected in Senegal and suspected of conducting illegal transhipment operations in the ICCAT convention area. The vessel was a longliner converted into a fish carrier, or “mini reefer”. It was operating without ICCAT authorisation and supporting illegal fishing operations by a group of non-authorised fishing vessels.

This prompted an investigation by Liberia, and verification of documents revealed that the operator’s claim that the vessel had been previously flagged in Indonesia was fraudulent. Initial analysis of the Indonesian registration certificate presented by the operator raised concerns, as the name and call sign given did not match any known vessel identity. The document was shared with Indonesian authorities for verification, and they confirmed that it was a forgery.

Analysis of the other documents shared by Liberian and Senegalese authorities revealed a number of other inconsistencies indicative of vessel identity fraud, and uncovered the vessel’s previous identity and operations. The vessel was subsequently denied registration in Liberia.

Verification approach:

Visual Analysis
Crosschecking information
Verification with issuing authorities
Forged licence

2012: The South Korean-flagged purse seiner PREMIER was inspected in Port Louis, Mauritius, after it had been detected operating suspiciously in West Africa. The vessel was suspected of fishing illegally in Liberia during a moratorium, based on analysis of AIS tracking data.

The inspectors found a faxed copy of a Liberian fishing licence onboard the vessel; this did not however match the known licence format. Verification by Liberia confirmed this to be a forgery. Inspection of the vessel logbook confirmed that illegal fishing had occurred during the period covered by the forged licence, enabling Liberia to take legal action against the PREMIER.

2013: The vessel was denied port access to offload its catch and its fishing licences were not renewed in several countries. Around this time, several countries reported receiving letters that purported to originate with the Liberian government, absolving the vessel of all illegal fishing charges. These letters were also confirmed to be forgeries.

The vessel owners eventually paid a USD one million fine to the Liberian government in settlement of charges against PREMIER.

Verification approach:
Comparison with genuine documents
Verification with issuing authorities
CASE STUDY

Forged documents, fake IMO number

2018: Authorities in Madagascar conducted an inspection of a Togolese-flagged fishing vessel, the STS-50. Documents found on board included an IMO number, the name STS-50 and listed the current flag as Togo. However, a former name STD NO. 2 was clearly visible under paint on the hull and was not referenced in the documents carried on board. This name was crosschecked with external vessel databases, which revealed that the vessel was very likely the IUU listed ANDREY DOLGOV operating under a new identity.

The ANDREY DOLGOV has an IMO number, which did not match that written on the vessel documents - however further investigation revealed that the IMO number on the vessel documents was invalid and has never been associated with any vessel, so it is assumed to have been fabricated.

Further analysis of documents revealed a number of forgeries, in particular several certificates allegedly issued on behalf of the Government of Togo. The classification society mentioned on the certificates was contacted to verify the documents and confirmed they had not issued them. Several elements, including the surveyor’s name, stamp and certificate numbers were identified as clear indicators of forgery.

After absconding from Mozambique, where it was under investigation, the vessel was tracked across the Western Indian Ocean region, and was pursued by Sea Shepherd vessel Ocean Warrior for several days. The STS-50 was eventually arrested by the Indonesian Navy.

Verification approach:

Visual analysis
Crosschecking information
Verification with issuing authorities
Fraudulently issued licences

2012: Two tuna longliners were detected on AIS fishing in the Tanzanian EEZ although they did not appear on the list of vessels licensed to fish in Tanzania. Enquiries were made to their respective flag States, who provided copies of alleged Tanzanian fishing licences held by these vessels. These were confirmed by Tanzania to have been issued outside of official channels.

A network issuing fake Tanzanian licences was uncovered when nine further vessels were found to carry similar fake documents, with another 20 vessels suspected of having received their licences through the same scheme. A junior staff member at the Deep Sea Fisheries Authority was arrested for document forgery but subsequently released. The vessel operators claimed that they had purchased licences through an agent in good faith, although it was noted that none of the vessels involved were providing the required entry and exit reports to Tanzania. In addition, no licence fees had been paid into the government account, even though the vessel agent and operator had used this account previously.

2015: After the scheme was uncovered, enabling a crackdown on vessels using fake licences, Tanzania's licensing revenue increased by USD 300,000.

Verification approach:
Verification with issuing authorities
AIS DATA PROVIDED
BY EXACTEARTH
Falsified gross tonnage

2015: The GREKO 1 and GREKO 2 (flagged to Belize) had been fishing in Somalia for several years, using the port of Mombasa, Kenya as a base and to offload their catch. Kenya made several attempts to contact Somalia to verify the fishing licences of the GREKO 1 and GREKO 2, but lack of communication channels meant that this was unsuccessful and the vessels were allowed to offload catch and depart port without their documents being verified.

2016: Somalia joined the FISH-i Africa Task Force and alerted its neighbouring countries to the illegal fishing activities of the GREKO 1 and GREKO 2. The Task Force provided an operational communication channel between Kenya and Somalia, and on the next attempt of the GREKO 1 to call in to Mombasa the vessel was denied port access and returned to Mogadishu. The vessel eventually gained access to Mombasa after declaring ‘force majeure’, where it was inspected. Illegal fishing was confirmed and the vessel owners were fined USD 65,000.

2017: The owner of GREKO 2 (now renamed HUIHANG 68) applied for the vessel to be reflagged to Tanzania. Cross-referencing of documents submitted for the registration process revealed that they listed the vessel’s Gross Tonnage to be 148, whereas the previous Belize registration certificate gave a tonnage of 193. It was suspected that the vessel’s tonnage had been misreported in order to secure access to fish in Tanzanian waters, which is restricted to vessels with a gross tonnage of 150 or less. At the time of publication this is an ongoing legal case in Tanzania.
Copied documents used in vessel identity fraud

2014: A vessel claiming to be the Indonesian-flagged KARYA WIJAYA 201 was inspected in Port Louis, Mauritius, where it was noted that a vessel using the same name had called in to port earlier the same month.

The vessel was broadcasting a name on AIS (CHI HSIANG NO. 7) that was different to that painted on its hull, had been recently repainted and documents presented to the inspectors appeared to be copies instead of originals. Photos of the vessel were compared with photos that had been archived from the previous port call, and differences in the vessel design were noticed. Taken together these findings were a strong indication that two different vessels had used the identity KARYA WIJAYA 201 and the second vessel was falsifying its identity. It was suspected that the documents presented were copies of the genuine documents belonging to the original KARYA WIJAYA 201.

Photo analysis revealed that the second vessel that called in to Port Louis showed strong similarities with a vessel that had been photographed in Mombasa, painted with another name, BINTANG SAMUDRA – 68, but also transmitting as CHI HSIANG NO. 7 on AIS.

Verification approach:
Visual analysis
Crosschecking information
CONCLUSION

Document verification plays an important role in ensuring the legal operation of fishing vessels. Through visual analysis, crosschecking information and verifying information with issuing authorities, fisheries officials conducting due diligence checks or inspections can identify high-risk vessel operators who are not complying with the regulations.
## ACRONYMS AND ABBREVIATIONS

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
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<tbody>
<tr>
<td>ABNJ</td>
<td>Areas beyond national jurisdiction</td>
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<tr>
<td>AIS</td>
<td>Automatic Identification System</td>
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<tr>
<td>CLAV</td>
<td>Consolidated List of Authorised Vessels</td>
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<td>EEZ</td>
<td>Exclusive economic zone</td>
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<td>EU</td>
<td>European Union</td>
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<td>FAD</td>
<td>Fish aggregation device</td>
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<td>FCWC</td>
<td>Fisheries Committee for the West Central Gulf of Guinea</td>
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<tr>
<td>GPS</td>
<td>Global Positioning System</td>
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<tr>
<td>GISIS</td>
<td>Global Integrated Shipping Information System</td>
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<td>GT</td>
<td>Gross tonnage</td>
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<td>ICCAT</td>
<td>International Commission for the Conservation of Atlantic Tunas</td>
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<td>IMO</td>
<td>International Maritime Organization</td>
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<tr>
<td>IOTC</td>
<td>Indian Ocean Tuna Commission</td>
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<tr>
<td>IRCS</td>
<td>International Radio Call Sign</td>
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<tr>
<td>IUU</td>
<td>Illegal, unreported and unregulated fishing</td>
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<td>MCS</td>
<td>Monitoring, control and surveillance</td>
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<tr>
<td>MMSI</td>
<td>Maritime Mobile Service Identity</td>
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<tr>
<td>PDF</td>
<td>Portable Document Format</td>
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<td>PSM</td>
<td>Port State measures</td>
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<tr>
<td>RFMO</td>
<td>Regional Fisheries Management Organisation</td>
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<tr>
<td>USA</td>
<td>United States of America</td>
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<tr>
<td>VMS</td>
<td>Vessel Monitoring System</td>
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<tr>
<td>WATF</td>
<td>West Africa Task Force</td>
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FISH-i Africa is an operational task force developed by eight East African countries and Stop Illegal Fishing to fight illegal fishing in the Western Indian Ocean. FISH-i is being adopted by the Southern African Development Community and will become an integral part of their Regional Monitoring, Control and Surveillance Coordination Centre. FISH-i is supported by a Technical Team made up of Stop Illegal Fishing, NFDS and Trygg Mat Tracking.

The West Africa Task Force brings together the six member countries of the Fisheries Committee of the West Central Gulf of Guinea (FCWC) to tackle illegal fishing and fisheries crime. The Task Force forms the MCS mechanism of the FCWC, and is supported by a Technical Team that includes Trygg Mat Tracking and Stop Illegal Fishing with funding from Norad.

The African Ports Network to stop illegal fishing is working to effectively implement the Port State Measures Agreement to prevent and deter illegal, unreported and unregulated fishing. Initially supporting authorities in Ghana, Madagascar and Mozambique. The African Ports Network aims to develop an operational network of ports throughout Africa, in order to keep illegal fishing vessels and illegally caught fish out of African ports.
HELP TO STOP ILLEGAL FISHING.

Send your photos of fishing vessels to:
info@stopillegalfishing.org and info@tm-tracking.org