

**INFORMATION RELATED TO OTHER CASES OF PRESUMED IUU FISHING ACTIVITIES IN  
THE IOTC AREA**

Prepared by IOTC Secretariat, 22 April 2026

**PURPOSE**

To bring to the attention of the Compliance Committee, information received from Madagascar, the United Kingdom and the Non-Governmental Organisation, Environmental Justice Foundation (EJF), regarding five fishing vessels; four vessel registered to Sri Lanka and one vessel registered to Indonesia. The activities undertaken by these vessels are presumed to have undermined the effectiveness of conservation and management measures adopted by the Indian Ocean Tuna Commission.

**INFORMATION REPORTED TO THE IOTC SECRETARIAT**

The submissions of Madagascar and the United Kingdom are marked as “Notification of illegal activity to IOTC Secretariat” and “Recommend notification of activity to flag State.” By means of this document Sri Lanka is being notified of the presumed illegal fishing activities of the four Sri Lankan vessels. By this same means, Indonesia is being notified of the presumed illegal fishing activities of the Indonesian registered vessel, BANDAR NELAYAN 16.

The information submitted are presented in Annex I of this document.

**INFORMATION ON THE STATUS OF THE FOUR VESSELS IN THE IOTC RECORD OF AUTHORISED VESSELS**

At the time of preparation of this document, the following observations were made with regards to the status of the four vessels in the IOTC Record of Authorised Vessels.

Vessel name	Status in the e-RAV
IMUL-A-0899-CHW	The vessel is currently in the e-RAV with an expired authorisation period. It's last authorisation period was 13/09/2024 – 12/09/2025.
IMUL-A-0923-CHW	The vessel is currently in the e-RAV with an expired authorisation period. It's last authorisation period was 03/02/2025 – 02/02/2026.
IMUL-A-1578-MTR	The vessel is currently in the e-RAV with an expired authorisation period. It's last authorisation period was 16/12/2024 – 15/12/2025.
IMUL-A-0627-NBO	The vessel is currently delisted in the e-RAV. The effective date of its delisting is 06/01/2024.
BANDAR NELAYAN 16	The vessel is currently in the e-RAV with a valid authorisation period. Its current authorisation period is 01/02/2026 – 31/12/2026. The IMO number 8787911, provided in the EJF report is different from what is provided in the e-RAV; 8787991.

**RECOMMENDATION/S**

That the CoC23:

- 1) **NOTE** paper IOTC–2026–CoC23–11, which provide contexts for presumed illegal activities of a vessel registered to Sri Lanka, as reported by Madagascar.

- 2) **NOTE** paper IOTC–2026–CoC23–11, which provide contexts for presumed illegal activities of three vessels registered to Sri Lanka, as reported by the United Kingdom.
  - 3) **NOTE** paper 2026–CoC23–11, which provide contexts for presumed illegal activities of a vessel registered to Indonesia, as reported by the Environmental Justice Foundation.
  - 4) **NOTE** that paper IOTC–2026–CoC23–11, serves as notification to Sri Lanka of the presumed illegal activities of the fishing vessels, IMUL-A-0899-CHW, IMUL-A-0923-CHW, IMUL-A-1578-MTR and IMUL-A-0627-NBO, registered to Sri Lanka.
  - 5) **NOTE** that paper IOTC–2026–CoC23–11, serves as notification to Indonesia for the presumed illegal activities of the fishing vessel, BANDAR NELAYAN 16, registered to Indonesia.
  - 6) **RECOMMEND** that Indonesia and Sri Lanka provide the Compliance Committee with information on actions that they have taken to exercise flag State controls over their vessels which operate in areas beyond national jurisdiction.
  - 7) **RECOMMEND** that Indonesia and Sri Lanka keep CPCs informed on the progress and outcomes of their investigations against the owner/master of the vessels mentioned in recommendations 4, 5 and 6, above.
  - 8) **RECOMMEND** that CPCs continue to provide the Compliance Committee with information on actions they undertake to combat fishing practices that undermines the effectiveness of conservation and management measures adopted by the Indian Ocean Tuna Commission.
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## Annex I

### Letters, IOTC IUU Reporting Forms and the evidence for the cases reported in this document.

To assist in the review of this Annex, the following provides a summary of the contents to navigate through this document.

Click on an item below to navigate to the desired section.

1. Information received from Madagascar against one vessel flagged to Sri Lanka:
  - i. Vessel **IMUL-A-0899-CHW**
    - a. IUU Reporting Form
2. Information received from the United Kingdom against three vessels flagged to Sri Lanka:
  - i. Vessel **IMUL-A-0923-CHW**
    - a. Letter to IOTC Executive Secretary
    - b. Additional evidence
    - c. IUU Reporting Form
    - d. Letter to Director General, Department of Fisheries and Natural Resources, Sri Lanka
  - ii. Vessel **IMUL-A-1578-MTR**
    - a. Letter to IOTC Executive Secretary
    - b. Additional evidence
    - c. IUU Reporting Form
    - d. Letter to Director General, Department of Fisheries and Natural Resources, Sri Lanka
  - iii. Vessel **IMUL-A-0627-NBO**
    - a. Letter to IOTC Executive Secretary
    - b. Additional evidence
    - c. IUU Reporting Form
    - d. Letter to Director General, Department of Fisheries and Natural Resources, Sri Lanka
3. Information received from the Environmental Justice Foundation against one vessel flagged to Indonesia:
  - i. Vessel **BANDAR NELAYAN 16**
    - a. Vessel Activity Notification

## ANNEX I

### IOTC REPORTING FORM FOR ILLEGAL ACTIVITY

Recalling IOTC Resolution 24/03 On establishing a list of vessels presumed to have carried out illegal, unreported and unregulated fishing in the IOTC Area, attached are details of illegal activity recorded by Madagascar.

#### A. Details of Vessel

(Please detail the incidents(s) in the format below)

Item	Definition	Indicate
a	Current Name of Vessel (Previous name/s, if any)	IMULA0899CHW (RUTH BABA 6)
b	Current Flag (previous flag/s, if any)	Sri Lanka
c	Date first included on IOTC IUU Vessel List (if applicable)	Not applicable
d	Lloyds IMO Number, if available	8442620
e	Photo	See attachment
f	Call Sign (previous call sign, if any)	4SF5861
g	Owner (previous Owner/s, if any)	WARNAKULASURIYA MAHALEKAMGE KALUN JANAKA
h	Operator (previous Operator/s, if any) and Master/Fishing Master	Unknown
i	Date of alleged IUU fishing activities	02 June 2025
j	Position of alleged IUU fishing activities	15°05,594 S, 044°27.960 E
k	Summary of alleged IUU activities (see section B for more detail)	Engaged in fishing or fishing related activities in waters that are under the national jurisdiction of a coastal State without the permission or authorisation of that State or in contravention of the laws and regulations of that State (without prejudice to the sovereign rights of the State concerned to undertake enforcement measures against such a vessel)
l	Summary of any actions known to have been taken in respect of the alleged IUU fishing activities	
m	Outcome of actions taken	

## B. Details of IOTC Resolution Elements Contravened

(Indicate with a "X" the individual elements of IOTC Resolution 24/03 contravened, and provide relevant details including date, location, source of information. Extra information can be provided in an attachment if necessary.)

That a vessel has, within the IOTC Area and in relation to species covered by the IOTC Agreement or by IOTC Conservation and Management Measures:

Item	Definition	Indicate
a.	engaged in fishing or fishing related activities and is neither registered on the IOTC Record of Authorised Vessels in accordance with Resolution 15/04 [superseded by <a href="#">Resolution 19/04</a> ], nor recorded in the Active list of vessels; or	
b.	engaged in fishing or fishing related activities when its flag State is without quota, catch limit, or effort allocation under IOTC Conservation and Management Measures where applicable; or	
c.	failed to record or report its catches in accordance with IOTC Conservation and Management Measures or has made false reports; or	
d.	taken or landed undersized fish in contravention of IOTC Conservation and Management Measures; or	
e.	engaged in fishing or fishing related activities during closed fishing periods or in closed areas in contravention of IOTC Conservation and Management Measures; or	
f.	used prohibited fishing gear in contravention of IOTC Conservation and Management Measures; or	
g.	transhipped fish to, or otherwise participated in joint operations with, support or re-supply vessels that are not included on the IOTC Record of Authorised Vessels or not on the Record of Vessels Authorised to receive transshipments at-sea in the IOTC Area or	
h.	engaged in fishing or fishing related activities in waters that are under the national jurisdiction of a coastal State without the permission or authorisation of that State or in contravention of the laws and regulations of that State (without prejudice to the sovereign rights of the State concerned to undertake enforcement measures against such a vessel); or	X
i.	engaged in fishing or fishing related activities whilst being without nationality; or	
j.	engaged in fishing or fishing related activities having intentionally falsified or concealed its markings, identity or registration; or	
k.	engaged in fishing or fishing related activities in contravention of any other binding IOTC Conservation and Management Measures;	

**C. Associated Documents**

IMULA0899CHW.jpeg in Attachment

**D. Recommended Actions**

<b>Recommended Actions</b>		<b>Indicate</b>
a	Notification to IOTC Secretariat only. No further action is recommended.	
b	Notification of illegal activity to IOTC Secretariat. Recommend notification of activity to flag State.	X
c	Recommended for inclusion on IOTC IUU list	

Attachment





Dr Paul DeBruyn  
Executive Secretary  
Indian Ocean Tuna Commission  
Mahe  
Seychelles

19 February 2026

Dear Dr DeBruyn,

**Resolution 24/03 On establishing a list of vessels presumed to have carried out IUU fishing in the IOTC Area of Competence: Sri Lankan flagged Vessel IMUL-A-0923-CHW (ISHANI 3 (departure form) / ISHANI DUWA (hull)) (IOTC No. 17478)**

As required in paragraphs 5 and 6 of Resolution 24/03 a completed IOTC Reporting form for Illegal Activity and accompanying evidence supporting: presumed IUU fishing activity in BIOT waters; fishing contrary to IOTC Conservation Management Measures for the Sri Lankan flagged vessel IMUL-A-0923-CHW (ISHANI 3 (departure form) / ISHANI DUWA (hull)) is submitted with this letter.

The attached evidence shows that:

- The Senior Fisheries Protection Officer boarded and inspected the vessel IMUL-A-0923-CHW on 11 December 2025 inside the BIOT MPA.
- On 16 December 2025, the BIOT Administration wrote to Sri Lanka and requested that they conduct a regulatory investigation into the activities of the vessel, and share VMS details.
- The vessel was on the IOTC Record of Authorised Vessels, #17478.
- The vessel had not submitted a request to transit BIOT waters and was not on a typical transit route.
- The vessel stopped overnight and had empty line drums, though the Captain claimed they only fished with nets. It was acting suspiciously and was presumed to be fishing in waters that are under the national jurisdiction of a coastal State without permission or authorisation.
- The vessel inspection observed found only shark and endangered IUCN protected species on board, there were no IOTC species.
- The vessel was in contravention of IOTC Conservation Management Measures (e.g. VMS not functional).
- The vessel was not detained for operational reasons and the Master was instructed to leave the FCMZ and return to Sri Lanka.
- DFAR provided details on 9 February 2026 of the actions it has taken. The BIOT Administration is grateful to Sri Lanka for the assistance and information provided towards combatting IUU. We note that the vessel has been detained and the fishing licence suspended; the Skipper and owner were summoned to DFAR and an enquiry initiated. However, specific details of the investigation have not been provided to BIOTA, including positional data up to any point that it stopped functioning, as requested, nor the species found on board. The investigation is ongoing with a court case set for 2 April 2026.

Noting that this vessel is authorised to fish in the IOTC area and it had no IOTC species on board during inspection, we submit this vessel to IOTC Compliance Committee with recommendation **a) ‘Notification to IOTC Secretariat only. No further action is recommended.’** and we call on Sri Lanka to take all necessary measures to strengthen its Flag State obligations to prevent IUU fishing

in the IOTC Area. Furthermore we request that Sri Lanka explain how a vessel on the IOTC Authorised List of Vessels had been issued a departure form when the VMS unit on board was nonfunctional.

I would be grateful if you could circulate this material for the information and consideration of the Compliance Committee. Thank you.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'J. Moir Clark', with a stylized flourish at the end.

Mr J. Moir Clark  
UK Delegation to IOTC

Supporting evidence: IOTC Reporting form for Illegal Activity and associated documentation for IMUL-A-0923-CHW (ISHANI 3 (departure form) / ISHANI DUWA (hull))

## 1. SUMMARY

Date and time of boarding	11/12/2025 07:40
Patrol type and number	FIPA 197
Vessel name	ISHANI 3 (departure form) / ISHANI DUWA (hull)
Vessel type	LL (Registered as longliner, presence of a net)
Vessel flag and port of reg.	LKA WENNAPPUWA
Vessel Registration No.	IMULA0923CHW
IOTC# (if registered)	17478
Vessel Captain's name	E. PIYANTHA
SFPO	Marion BOURASSEAU
BPV crew assisting	William FARQUHAR

### Action Taken:

The FV was found on the radar at 2:01, in the Great Chagos Bank, with a speed of 4.5 knots and headed north, inconsistent with a transit course. The FV stopped around 3:15 and drifted until 5:30. It then started steaming at a speed of 7 to 8 knots with a course eluding the BPV.

The RHIB was launched and the FV stopped when instructed with direct communication from the RHIB.

Despite being asked several times for the reason why the FV was stopped during the night, the captain denied it and stated that they were transiting back to Sri Lanka and didn't stop at night. He also stated that when the FV was eluding the BPV, it was to avoid a collision.

Two marks were visible on the FV's GPS tracker: one on the current position of the FV and one on the southwest edge of the GCB. The track had apparently just been removed and a waypoint had been set to the east, outside of BIOT.

The VMS was not working, for an issue with batteries and alternator, according to the captain.

The AIS was set in reception only at the beginning of the inspection. When instructed, the captain switched it to transmitting and the signal became visible from the BPV's bridge.

The inspection revealed a catch only composed by sharks, mainly reef blacktip (*Carcharhinus melanopterus*).

A Bowmouth guitarfish (*Rhina ancylostoma*), critically endangered species on the IUCN red list, was also present onboard. The captain stated that the whole catch present onboard came from Saya de Malha Bank, in International Waters.

The captain stated that they were using only the net, and targeting sharks only. The other fish would be discarded. The presence of fish scales in the net attested that some fish were caught, but none was found onboard during the inspection.

One drum of longline with about 100 hooks on wiretrace was observed onboard, along with one bag of nylon longline. Three empty drums and three empty bags were found, the captain stated that these fishing gears had already been packed away, as they were not using longline, but the net.

As no evidence or verbal admission of illegal fishing or gear in the water could be obtained, the captain was issued a verbal warning for possession of wire trace and for stopping in GCB. He was instructed to resume transit and leave BIOT, following the waypoint set on their GPS tracker to the east of BIOT. He was instructed to leave the AIS on transmitting and the FV was escorted out of GCB by the BPV.

At this stage, it is uncertain if a longline was actually set in the water, a possibility that would explain the empty drums and bags. A further patrol will be conducted in the area around the position of the mark in the southwest of the Great Chagos Bank that was visible on the FV's GPS tracker.

## 2. INITIAL SIGHTING DETAILS (from Initial Target Sighting Form)

Date and time of first sighting	11/12/2025 2:01						
Sighted by: <i>(insert name)</i>	Lukasz KISIELEWSKI	Radar	X	Visual			
Position of target	6°12.5' S 71°37.5' E						
Course	35	Speed	4.5	Range	4.3	Bearing	179
Time Fisheries Pennant and Sierra Quebec 3 raised	6:30			Time Vessel hailed on VHF CH16 and/or MF 2182 kHz		7:25	
Time target requested to stop and prepare for boarding.	7:38			Response to request for boarding.		Compliant	
<u>Comment:</u>							

## 3. LAUNCHING OF RHIB

Time RIB launched	7:20	RIB Crew (Names)	William FARQUHAR, Donald MACFARLANE, Marion BOURASSEAU, Steven BROWN
<u>Comment:</u>			

## 4. BOARDING DETAILS

Date and time vessel boarded	11/12/2025 7:46	Position boarded	6°20.044S 71°34.515E
BPV crew assisting	William FARQUHAR		
Language used by FV crew	English	Cards used (Y/N)	N
Language card numbers used			

## 5. CAPTAIN and CREW DETAILS

Captain's name	E. PIYANTHA	Nationality	LKA
Captain's address	19/18, Egodawatta, Beruwala		
Captain's D.o.B	15/02/1980	No. of crew inc. Captain	6
Nationality of Crew	LKA		
Are any crew under 18 or have health issues (Y/N), if 'Y' provide details.	N		

## 6. VESSEL DOCUMENTS and REGISTRATION

Vessel Name	ISHANI DUWA (Hull) / ISHANI 3 (Departure form)		
International Callsign	4SF5733		
Flag State	LKA		
Authorisation to Fish/Fishing Licence No.	25EEZIMUL17897CHW		
Valid from / to (dd/mm/yyyy)	03/02/2025 – 02/02/2026		
Port of Registration	WENNAPPUWA		
Registration Number	IMULA0923CHW		
FV owner name and details (as per licence)	B. L. SUSIL FERNANDO No 365 Bodhi H/W Madu Koswadaya Mahawewa		
Fishing logbook No.	LB LL-25 1818		
Issuing Authority	DFAR Sri Lanka		
Date of last logbook entry (dd/mm/yyyy)	New logbook		
Position of last entry	First page		
Boat Departure Form/Port Exit Documents (Y/N): if Y provide port and date of departure.	Y, Wennappuwa 11/11/2025		
Insurance documentation (Y/N)	Y		
Names and addresses of owners	BLS FERNANDO No 365 Bodhi H/W Madu Koswadaya Mahawewa		
Overall length (ft/m)	54'00"	Engine Power (KW/hp)	335hp
Other paperwork:			

## 7. INTERVIEW WITH CAPTAIN (informal – not under caution)

Time of interview	7:50	To or from fishing grounds	From fishing grounds	Port of departure	
Fish onboard?	Y	Where caught?	Saya de Malha Bank	When caught?	
Destination	Sri Lanka		ETA		
<u>Comments:</u>					
Captain declares that there are only sharks onboard, about 5 tons, caught in Malha Bank with the net only. All the catch in ice. He declares that there are a small amount of hooks and longline onboard but these are not used					

## 8. VESSEL INSPECTION

Fishing gear type	Longline and net
<u>Comments</u>	
Size of the net reported by the captain: 2km. Set in the water with 7 danbouys.	
Longline visible: 100 hooks on wire trace.	

Catch onboard (estimated/reported t)	Estimated 5 tons of sharks in ice		
IOTC species onboard (Y/N)	N	Endangered species onboard (Y/N)	Y
Description of catch	Reef blacktips visible in 3 compartments of the fish hold, in ice. 1 bowmouth guitarfish ( <i>Rhina ancylostoma</i> )		
<u>Comments:</u>			

## 9. BIOT ORDINANCE NON-COMPLIANCE (Y/N)

<b>Section 5 (1(c)):</b> Possession of sea cucumbers or molluscs	N
<b>Section 6 (1(a)):</b> Fishing using prohibited fishing gear	N
<b>Section 6 (2):</b> Possession of prohibited fishing gear	Y
<b>Section 7 (1):</b> Fishing without a license	N
<b>Section 9 (1):</b> Fishing gear not stowed and readily available for fishing	N
<b>Section 16:</b> Obstruction of a Fisheries Protection Officer	N
<b>Other:</b>	
<u>Comments:</u> Possession of wire trace.	

**10. IOTC IUU Activity (Resolution 24/03).** Applies to vessels, Owners, Operators and Masters that undertake fishing and fishing related activities, for IOTC species, or by IOTC Conservation and Management Measures (CMMs), within the IOTC Area. (Activities relevant to BIOT)

Para.	Definition of IUU Fishing Activities	Indicate (Y/N)
4) a.	Is the vessel engaged in fishing or fishing related activities and is neither registered on the IOTC Record of Authorised Vessels in accordance with Resolution 19/04, nor recorded in the Active list of vessels?	N
4) c.	Has the vessel failed to record or report its catches in accordance with IOTC CMMs or has made false reports?	N
4) d.	Has the vessel taken or landed undersized fish in contravention of IOTC CMMs?	N
4) f.	Has the vessel used prohibited fishing gear in contravention of IOTC CMMs?	N
4) g.	Has the vessel transhipped fish to, or otherwise participated in joint operations with, support or re-supply vessels that are not included on the IOTC Record of Authorised Vessels or not on the Record of Vessels Authorised to receive transshipments at-sea in the IOTC Area?	N
4) h.	Is the vessel engaged in fishing or fishing related activities in waters that are under the national jurisdiction of a coastal State without the permission or authorisation of that State or in contravention of the laws and regulations of that State?	N
4) j.	Is the vessel engaged in fishing or fishing related activities having intentionally falsified or concealed its markings, identity or registration?	N
4) k.	Is the vessel engaged in fishing or fishing related activities in contravention of any other binding IOTC CMMs ( <b>indicate non-compliance with CMMs in Section 1.1</b> )?	Y

**IOTC CMM Non-Compliance**

Resolution	Subject	Indicate (X)
19/04	IOTC Record of vessels (documents/logbook/markings)	X
15/03	Vessel VMS (operational, tamperproof)	X
17/07	Illegal gear (largescale driftnets >2.5km)	
12/04	Turtle de-hookers and line cutters	
19/03	Capture and retention of mobulid rays	
17/05	Shark fins	
12/09	Thresher sharks	

Comments:

19/04 19. b): floats not marked with the letters or numbers of the vessel

Resolution	Subject	Indicate (X)
15/03 7:	VMS not fully operational	

### 11. SFPO ACTIONS TAKEN (Y/N)

Vessel and Master detained and escorted to DG	
FPN issued and catch and gear seized	
Master given verbal warning and released	X
No further action, vessel released	
<u>Comments:</u> Verbal warning for possession of wire trace. Verbal warning for stopping in GCB. Instructed to resume transit and leave BIOT, to the east, with AIS transmitting. Escorted by BPV outside of GCB.	

### 12. DISEMBARKATION and RECOVERY

Time FV disembarked	8:38	Time RIB recovered to BPV	8:44
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### 13. VESSEL RECORDS and HISTORY

Vessel on IOTC register (Y/N)	Y	IOTC number	17478
Date authorised from	03/02/2025	Date authorised to	02/02/2026
Vessel currently authorised to fish in IOTC area of competence (Y/N)	Y	IOTC database reference:	RAV online version
Vessel previously boarded (Y/N)	N	Inspection report ID	
Master previously boarded (Y/N)	N	Inspection report ID	
Owner previously boarded (Y/N)	Y	Inspection report ID	DH014 and DH015
Crew previously boarded (Y/N)	Unk	Inspection report ID	
<u>Comments:</u>			

**Marion BOURASSEAU**  
BIOT Senior Fisheries Protection Officer

11/12//2025



[Fig.1] Portside



[Fig.2] Starboard side



[Fig.3] Stern



[Fig.4] Bow



[Fig.5] Holds lids on.



[Fig.6] Fore fish hold: three compartments filled with ice (including 1 with sharks) and bags of ice.



[Fig.7] Fore fish hold: one compartment filled with sharks (only blacktip reef sharks *Carcharhinus melanopterus* visible), estimated two to three tons.



[Fig.8] Aft fish hold: five compartments.



[Fig.9] Aft fish hold: two compartments filled with ice and sharks. Bags of ice.



[Fig.10] Aft fish hold: two compartments filled with sharks (blacktip reef sharks *Carcharhinus melanopterus* visible and possibly a grey reef shark *Carcharhinus amblyrhynchos*, fin visible on the front of the picture), estimated one ton in each compartment.



[Fig.11] Fish hold: Bowmouth guitarfish (*Rhina ancylostoma*) in ice.



[Fig.12] Catch: Bowmouth guitarfish brought on deck from fish hold.



[Fig.13] Fishing gear: 1 drum with approximately 100 hooks on wire trace.



[Fig.14] Fishing gear: 3 empty drums, secured on top of wheelhouse.



[Fig.15] Fishing gear: 1 bag of nylon longline.



[Fig.16] Fishing gear: 3 empty bags.



[Fig.17] Fishing gear: driftnet covered by a tarp, floats visible.



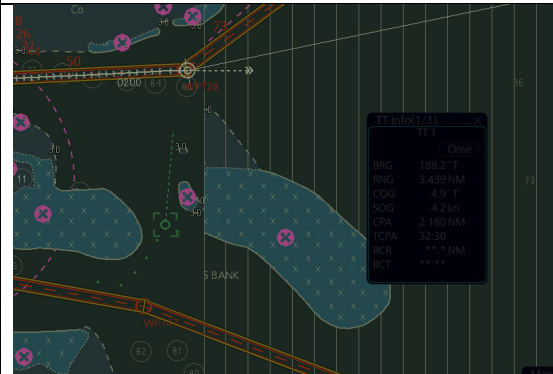
[Fig.18] Fishing gear: driftnet large mesh, colour orange and green, covered by a tarp. Fish scales in the net.



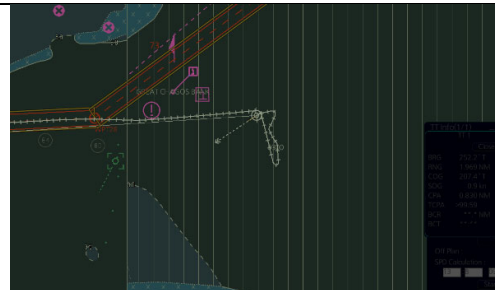
[Fig.19] Fishing gear on top of wheelhouse: danbuoys, floats, bags of nylon longline.



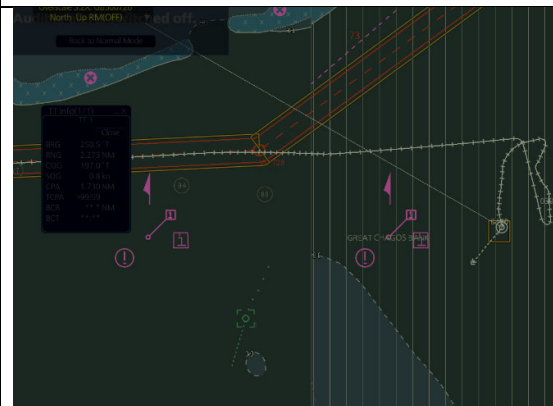
[Fig.20] AIS gear markers



[Fig.21] BPV's ECDIS screenshot taken at 2:17: FV heading North (green marker), speed 4.2knots.



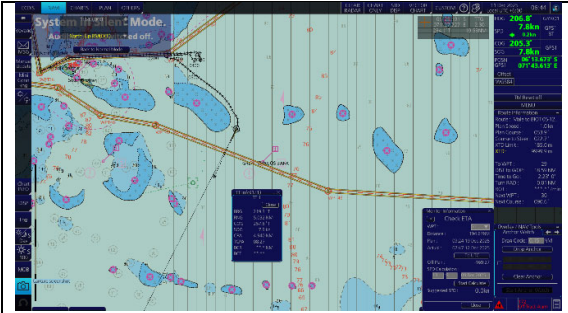
[Fig.22] BPV's ECDIS screenshot taken at 3:15: FV drifting (green marker), speed 0.9knots.



[Fig.23] BPV's ECDIS screenshot taken at 4:11: FV drifting (green marker), speed 0.7knots.



[Fig.24] BPV's ECDIS screenshot taken at 5:31: FV underway (green marker), speed 7.1knots.



[Fig.25] BPV's ECDIS screenshot taken at 5:31: FV headed southwest (green marker), speed 7.9knots, eluding BPV (black marker).



[Fig.26] FV's GPS tracker and SFPO's GPS.



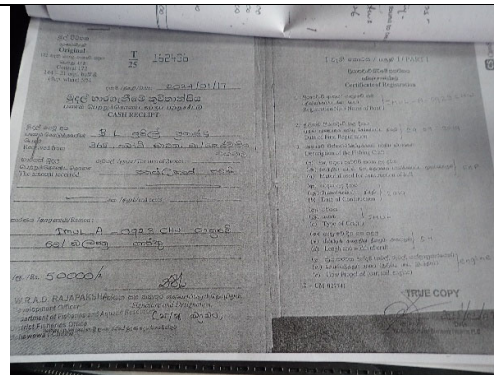
[Fig.27] Marks on FV's GPS tracker.



[Fig.28] VMS not working (vessel's batteries or alternator issue reported by captain).



[Fig.29] VMS numbers.



[Fig.30] Certificate of registration.

## ANNEX I

### IOTC REPORTING FORM FOR ILLEGAL ACTIVITY

Recalling IOTC Resolution 24/03 On establishing a list of vessels presumed to have carried out illegal, unreported and unregulated fishing in the IOTC Area, attached are details of illegal activity recorded by UK(OT) in British Indian Ocean Territory.

#### A. Details of Vessel

(Please detail the incidents(s) in the format below)

Item	Definition	Indicate
a	Current Name of Vessel (Previous name/s, if any)	ISHANI 3 (departure form) / ISHANI DUWA (hull) IMULA0923CHW
b	Current Flag (previous flag/s, if any)	Sri Lanka
c	Date first included on IOTC IUU Vessel List (if applicable)	N/A
d	Lloyds IMO Number, if available	N/A
e	Photo	Yes
f	Call Sign (previous call sign, if any)	4SF5733
g	Owner (previous Owner/s, if any)	B. L. SUSIL FERNANDO
h	Operator (previous Operator/s, if any) and Master/Fishing Master	B. L. SUSIL FERNANDO and E. PIYANTHA
i	Date of alleged IUU fishing activities	11/12/2025
j	Position of alleged IUU fishing activities	-6.33407 S 71.57525 E
k	Summary of alleged IUU activities (see section B for more detail)	(k). Contravention of IOTC CMMs (e.g. VMS not fully operational. Marker buoys/floats not correctly marked.)
l	Summary of any actions known to have been taken in respect of the alleged IUU fishing activities	Master given verbal warning and escorted from the area. Reported to flag State and investigation initiated.
m	Outcome of actions taken	Next court date set for 02.04.2026



## B. Details of IOTC Resolution Elements Contravened

*(Indicate with a "X" the individual elements of IOTC Resolution 24/03 contravened, and provide relevant details including date, location, source of information. Extra information can be provided in an attachment if necessary.)*

That a vessel has, within the IOTC Area and in relation to species covered by the IOTC Agreement or by IOTC Conservation and Management Measures:

Item	Definition	Indicate
a.	engaged in fishing or fishing related activities and is neither registered on the IOTC Record of Authorised Vessels in accordance with Resolution 15/04 [superseded by <a href="#">Resolution 19/04</a> ], nor recorded in the Active list of vessels; or	
b.	engaged in fishing or fishing related activities when its flag State is without quota, catch limit, or effort allocation under IOTC Conservation and Management Measures where applicable; or	
c.	failed to record or report its catches in accordance with IOTC Conservation and Management Measures or has made false reports; or	
d.	taken or landed undersized fish in contravention of IOTC Conservation and Management Measures; or	
e.	engaged in fishing or fishing related activities during closed fishing periods or in closed areas in contravention of IOTC Conservation and Management Measures; or	
f.	used prohibited fishing gear in contravention of IOTC Conservation and Management Measures; or	
g.	transhipped fish to, or otherwise participated in joint operations with, support or re-supply vessels that are not included on the IOTC Record of Authorised Vessels or not on the Record of Vessels Authorised to receive transhipments at-sea in the IOTC Area or	
h.	engaged in fishing or fishing related activities in waters that are under the national jurisdiction of a coastal State without the permission or authorisation of that State or in contravention of the laws and regulations of that State (without prejudice to the sovereign rights of the State concerned to undertake enforcement measures against such a vessel); or	
i.	engaged in fishing or fishing related activities whilst being without nationality; or	
j.	engaged in fishing or fishing related activities having intentionally falsified or concealed its markings, identity or registration; or	



---

Item	Definition	Indicate
k.	engaged in fishing or fishing related activities in contravention of any other binding IOTC Conservation and Management Measures;	X

### C. Associated Documents

Inspection Report titled: MB034\_ISHANI\_3\_20251211\_InspectionReport

Photographic Evidence titled: MB034\_ISHANI\_3\_20251211\_PhotographicEvidences

Notification of Vessel Inspection and Request for Assistance Letter, sent 25 November 2026. Titled: 20251125\_BIOT\_D FAR\_ISHANI 3\_IMULA0923CHW

### D. Recommended Actions

<b>Recommended Actions</b>		<b>Indicate</b>
a	Notification to IOTC Secretariat only. No further action is recommended.	
b	Notification of illegal activity to IOTC Secretariat. Recommend notification of activity to flag State.	X
c	Recommended for inclusion on IOTC IUU list	



British Indian Ocean Territory Administration  
Foreign, Commonwealth and Development Office  
London SW1A 2AH

Mr. Susantha Kahawatta  
Director General  
Department of Fisheries and Natural Resources  
No. 10 New Secretariat  
Maligawatta, Colombo 10

16 December 2025

E-Mail: [dgdgar@gmail.com](mailto:dgdgar@gmail.com); [sjksusantha@yahoo.com](mailto:sjksusantha@yahoo.com)  
cc. Kalyani Hewapathirana, Director Operations [hewakal2012@gmail.com](mailto:hewakal2012@gmail.com)  
Ms. Kumari Vithana (Legal Officer DFAR) [kumari.n.vithana@gmail.com](mailto:kumari.n.vithana@gmail.com)  
Mr. Jayakody (Director Investigation DFAR) [hsfuinvestigation@gmail.com](mailto:hsfuinvestigation@gmail.com)

Dear Mr Kahawatta,

**Notification of vessel inspection on Sri Lankan Flagged vessel in BIOT waters: IMUL-A-0923-CHW (ISHANI 3 (departure form) / ISHANI DUWA (hull)).**

On 11<sup>th</sup> December 2025, the Senior Fisheries Protection Officer inspected the vessel IMUL-A-0923-CHW (ISHANI 3 (departure form) / ISHANI DUWA (hull)). The vessel was found inside the BIOT MPA, and although no fishing gear was seen in the water there were shark on board that appeared to be recently caught, as well as a Bowmouth guitarfish (*Rhina ancylostoma*), a critically endangered species on the IUCN red list. The vessel was not on the usual transit route and was observed to be stationary on AIS during the early hours of 11<sup>th</sup> December 2025, within the BIOT MPA. The vessel had been issued a departure form however the VMS unit on board was confirmed to be nonfunctional by the captain and the vessel has since been escorted out of BIOT.

We would be grateful if you could investigate the activities of this vessel. Although the VMS onboard was nonfunctional, if any records do exist could you share these or any other positional data with us from them from 15<sup>th</sup> November 2025 up to today.

I attach the relevant boarding report for reference, if you have any questions or require assistance, please do not hesitate to contact us. We look forward to your continued cooperation in combatting IUU.

Yours Sincerely,

*Mike Vidler*

Michael Vidler  
BIOT Administrator, Director of Fisheries

James Moir Clark  
UK Delegation to IOTC

Attached 1) Boarding report for ISHANI 3 (IMUL-A-0923-CHW)



British Indian Ocean Territory Administration  
Foreign, Commonwealth and Development Office  
London SW1A 2AH

Dr Paul DeBruyn  
Executive Secretary  
Indian Ocean Tuna Commission  
Mahe  
Seychelles

19 February 2026

Dear Dr DeBruyn,

**Resolution 24/03 On establishing a list of vessels presumed to have carried out IUU fishing in the IOTC Area of Competence: Sri Lankan flagged IMUL-A-1578-MTR - MINIPURA 5 (IOTC No. 16673 – expired 15/12/25)**

As required in paragraphs 5 and 6 of Resolution 24/03 a completed IOTC Reporting form for Illegal Activity and accompanying evidence supporting: fishing contrary to IOTC Conservation Management Measures for the Sri Lankan flagged vessel IMUL-A-1578-MTR - MINIPURA 5 is submitted with this letter.

The attached evidence shows that:

- The Senior Fisheries Protection Officer boarded and inspected the vessel IMUL-A-1578-MTR - MINIPURA 5 on 8 January 2026 inside the BIOT MPA. There was no evidence of fishing in BIOT waters.
- The vessel was on the IOTC Record of Authorised Vessels, #16673 – but the authorisation to fish expired on 15/12/25. IOTC species, including yellowfin tuna, were in the catch. No logbook was presented when requested.
- On 21 January 2026, the BIOT Administration wrote to Sri Lanka with respect to potential breaches of IOTC CMMs 19/04 and 25/02.
- DFAR provided details on 9 February 2026 of the actions it has taken. The BIOT Administration is grateful to Sri Lanka for the assistance and information provided towards combatting IUU. We note that the vessel has been detained and the fishing licence suspended; the Skipper and owner were summoned to DFAR and an enquiry initiated. However specific details of the investigation have not been provided to BIOTA, including VMS positional data as requested. The investigation is ongoing.

Noting that there was no evidence of fishing in BIOT waters, but that the vessel was fishing in breach of IOTC CMMs including without valid authorisation, and, in the absence of a conclusion of the case to date, we submit this vessel to IOTC Compliance Committee with recommendation **b) ‘Notification of illegal activity to IOTC Secretariat. Recommend notification of activity to flag State.’**

I would be grateful if you could circulate this material for the information and consideration of the Compliance Committee. Thank you.

Yours sincerely

A handwritten signature in black ink, appearing to read 'J. Moir Clark', with a stylized flourish at the end.

Mr J. Moir Clark  
UK Delegation to IOTC

Supporting evidence: IOTC Reporting form for Illegal Activity and associated documentation for  
IMUL-A-1578-MTR - MINIPURA 5

## 1. SUMMARY

Date and time of boarding	08/01/2026 08:10
Patrol type and number	FIPA 199
Vessel name	Minipura 5 (as told by Captain), Ranil Marine RM 53.8 No.19 (as shown in hull)
Vessel type	LL
Vessel flag and port of reg.	LKA DICKOWITA
Vessel Registration No.	IMULA1578MTR
IOTC# (if registered)	16673
Vessel Captain's name	M.G.R.N. FERNANDO
SFPO	Daniel TEIXEIRA
BPV crew assisting	Colin MUIR, Oleksandr SHVETS, David STOCKTON, John WAREING

### Action Taken:

FV IMULA1578MTR was sighted at 23:10 of 07/01/2026, on the NE corner of GCB. It displayed a constant NE course and steady speed of 7.0 knots, consistent with transiting vessels, appearing to return to home port. The BPV changed course to follow the FV and inspect it at first light. FV made a stop at 06:35 and waited for instructions. Communication was attempted at 06:55 but there was no response. At 08:00 DC was launched followed by boarding at 08:10. No one aboard spoke English, language cards were used and information exchange was restricted to what was gathered from the replies after cards were shown.

FV had been fishing to the Southwest of BIOT, as pointed on the nav system, Captain noting their track on a straight line since leaving fishing grounds. Although operational, the UHF radio was turned off. VMS/AIS system experienced some sort of failure and was not working (connection between the transponder and ConBox not established).

The captain declared having approximately 5 tons of shark and 3 tons of tuna in the holds. Upon request inspection in the holds followed, this proving to be difficult as catch was on ice and hard to estimate. Bagged yellowfin tuna were observed on ice in the first hold and shark on the second hold, as stated.

All fishing gear was properly stowed, not ready for use and the deck was clean with no signs of recent fishing. A total of five drums with hooks, two with squid-shaped lures and three with hooks on wire trace.

Following the inspection, captain was issued the boarding receipt, given a verbal warning for possession of wire trace and no further action was taken. FV resumed its original course.

## 2. INITIAL SIGHTING DETAILS (from Initial Target Sighting Form)

Date and time of first sighting		07/01/2026 23:10					
Sighted by: <i>(insert name)</i>		Colin MUIR		Radar	X	Visual	
Position of target		04°02.4' S 72°50.9' E					
Course	61°	Speed	7.0	Range	7.5	Bearing	304°
Time Fisheries Pennant and Sierra Quebec 3 raised		07:00		Time Vessel hailed on VHF CH16 and/or MF 2182 kHz		00:54 06:55	
Time target requested to stop and prepare for boarding.		No reply (FV stopped at 06:35)		Response to request for boarding.		Compliant (when pre-boarding)	
<u>Comment:</u>							

## 3. LAUNCHING OF RHIB

Time RIB launched	08:00	RIB Crew (Names)	Paul DE GROOTE, Gerald HARVEY, Michael DOYLE, Daniel TEIXEIRA
<u>Comment:</u>			

## 4. BOARDING DETAILS

Date and time vessel boarded	08/01/2026 08:10	Position boarded	03°40.0'S 73°42.1'E
BPV crew assisting	Gerald HARVEY		
Language used by FV crew	Sinhalese	Cards used (Y/N)	Y
Language card numbers used	1 to 14		

## 5. CAPTAIN and CREW DETAILS

Captain's name	M.G.R.N. FERNANDO	Nationality	LKA
Captain's address	51, Iranawila East, Abakandawila		

Captain's D.o.B	03/01/1983	No. of crew inc. Captain	6
Nationality of Crew	LKA		
Are any crew under 18 or have health issues (Y/N), if 'Y' provide details.	N		

## 6. VESSEL DOCUMENTS and REGISTRATION

Vessel Name	Minipura 5 (reported by Captain and boat departure form) / Ranil Marine RM 53.8 No.19 (as shown in hull)
International Callsign	4SF4882
Flag State	LKA
Authorisation to Fish/Fishing Licence No.	23HSIMUL5021MTR
Valid from / to (dd/mm/yyyy)	30/11/2023 – 15/12/2024
Port of Registration	DICKOWITA
Registration Number	IMULA1578MTR
FV owner name and details (as per licence)	P. ABEYSOORIYA, id 580940935v, address Senagiri, Jayabodhoya Rd. Dondra, email Tharindukaushalya7gmail.com
Fishing logbook No.	Not presented
Issuing Authority	-
Date of last logbook entry (dd/mm/yyyy)	-
Position of last entry	-
Boat Departure Form/Port Exit Documents (Y/N): if Y provide port and date of departure.	Y, Dickowita 16/11/2025
Insurance documentation (Y/N)	Y (from 20/04/2024 to 20/04/2025)

Names and addresses of owners	Premalal L. ABEYSOORIYA, Senagiri, (Senasiri), Jayabodhoya (Jayabodiya) Rd. Dondra (Gandara), email Tharindukaushalya7gmail.com, contact 0776000045		
Overall length (ft/m)	16.38m	Engine Power (KW/hp)	485hp
Other paperwork:			

## 7. INTERVIEW WITH CAPTAIN (informal – not under caution)

Time of interview	08:12	To or from fishing grounds	From fishing grounds	Port of departure	Dickowita
Fish onboard?	Y	Where caught?	Position shown on GPS	When caught?	In December
Destination	Sri Lanka, home port		ETA	15/01/2026	
<u>Comments:</u> Poor communication, restricted to cards used.					
Captain stated catch onboard composed of 5 ton of shark and 3 ton of tuna.					

## 8. VESSEL INSPECTION

Fishing gear type	Longline / Net				
<u>Comments</u>					
11 bags of nylon line, 2 drums with 660 hooks with squid-shaped lures, 3 drums with 840 hooks on wire trace, 2 piles bundled on deck small-to-medium mesh pelagic drift gillnets. Gear markers not seen.					
Catch onboard (estimated/reported t)	Captain declared 5 tons of shark and 3 tons of tuna.				
IOTC species onboard (Y/N)	Y	Endangered species onboard (Y/N)	N		
Description of catch	Two holds, one with shark on ice and other with bagged YFT on ice.				
<u>Comments:</u> Confirmation of catch challenging to confirm as fish was on ice.					

## 9. BIOT ORDINANCE NON-COMPLIANCE (Y/N)

<b>Section 5 (1(c)):</b> Possession of sea cucumbers or molluscs	N
<b>Section 6 (1(a)):</b> Fishing using prohibited fishing gear	N
<b>Section 6 (2):</b> Possession of prohibited fishing gear	Y
<b>Section 7 (1):</b> Fishing without a license	N
<b>Section 9 (1):</b> Fishing gear not stowed and readily available for fishing	N
<b>Section 16:</b> Obstruction of a Fisheries Protection Officer	N
<b>Other:</b>	
<u>Comments:</u>  Possession of wire trace.	

**10. IOTC IUU Activity (Resolution 24/03).** Applies to vessels, Owners, Operators and Masters that undertake fishing and fishing related activities, for IOTC species, or by IOTC Conservation and Management Measures (CMMs), within the IOTC Area.(Activities relevant to BIOT)

Para.	Definition of IUU Fishing Activities	Indicate (Y/N)
4) a.	Is the vessel engaged in fishing or fishing related activities and is neither registered on the IOTC Record of Authorised Vessels in accordance with Resolution 19/04, nor recorded in the Active list of vessels?	Y
4) c.	Has the vessel failed to record or report its catches in accordance with IOTC CMMs or has made false reports?	Unk.
4) d.	Has the vessel taken or landed undersized fish in contravention of IOTC CMMs?	N
4) f.	Has the vessel used prohibited fishing gear in contravention of IOTC CMMs?	N
4) g.	Has the vessel transhipped fish to, or otherwise participated in joint operations with, support or re-supply vessels that are not included on the IOTC Record of Authorised Vessels or not on the Record of Vessels Authorised to receive transshipments at-sea in the IOTC Area?	N

4) h.	Is the vessel engaged in fishing or fishing related activities in waters that are under the national jurisdiction of a coastal State without the permission or authorisation of that State or in contravention of the laws and regulations of that State?	N
4) j.	Is the vessel engaged in fishing or fishing related activities having intentionally falsified or concealed its markings, identity or registration?	N
4) k.	Is the vessel engaged in fishing or fishing related activities in contravention of any other binding IOTC CMMs ( <b>indicate non-compliance with CMMs in Section 0</b> )?	Y

### 10.1 IOTC CMM Non-Compliance

Resolution	Subject	Indicate (X)
19/04	IOTC Record of vessels (documents/logbook/markings)	X
25/02	Vessel VMS (operational, tamperproof)	X
17/07	Illegal gear (largescale driftnets >2.5km)	
12/04	Turtle de-hookers and line cutters	
19/03	Capture and retention of mobulid rays	
25/08*	Sharks (finning, retention and wire trace)	
17/05**	Shark fins	
12/09**	Thresher sharks	
<u>Comments:</u> 19/04. IOTC eRAV authorisation expired 15/12/2025 (08/01/2026) 19/04. Logbook not presented. 24/02. VMS not working due to technical failure.		

\* Except India and Somalia

\*\* India and Somalia only.

### 11. SFPO ACTIONS TAKEN (Y/N)

Vessel and Master detained and escorted to DG	
FPN issued and catch and gear seized	
Master given verbal warning and released	X
No further action, vessel released	
<u>Comments:</u>  Verbal warning for possession of wire trace. No further action.	

### 12. DISEMBARKATION and RECOVERY

Time FV disembarked	08:47	Time RIB recovered to BPV	08:59
---------------------	-------	---------------------------	-------

### 13. VESSEL RECORDS and HISTORY

Vessel on IOTC register (Y/N)	Y	IOTC number	16673
Date authorised from	16/12/2024	Date authorised to	15/12/2025
Vessel currently authorised to fish in IOTC area of competence (Y/N)	N	IOTC database reference:	RAV online version (rav.iotc.org/fe/record)
Vessel previously boarded (Y/N)	N	Inspection report ID	--
Master previously boarded (Y/N)	N	Inspection report ID	
Owner previously boarded (Y/N)	N	Inspection report ID	-
Crew previously boarded (Y/N)	Unk	Inspection report ID	-
<u>Comments:</u>			

Daniel TEIXEIRA

08/01//2026

BIOT Senior Fisheries Protection Officer



**[Fig. 1]** Minipura 5 Starboard Side.



**[Fig. 2]** Minipura 5 Starboard Side.



**[Fig. 3]** Minipura 5 Portside.



**[Fig. 4]** Minipura 5 Portside.



[Fig. 5] Minipura 5 Portside. BPV in the back.



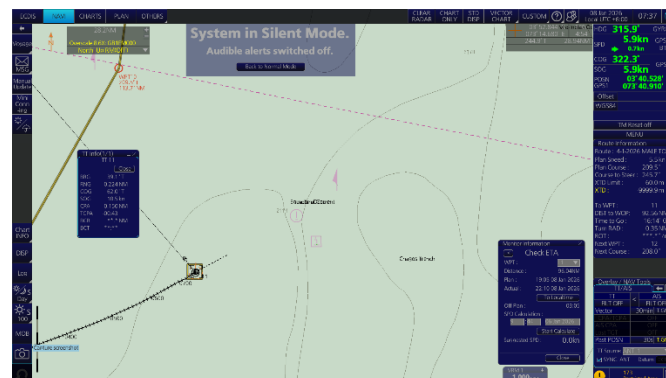
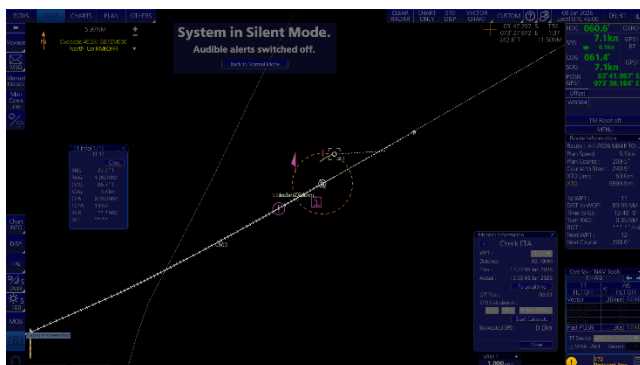
[Fig. 6] Minipura 5 Stern.



[Fig. 7] Minipura 5 Stern. BPV in the back.



[Fig. 8] Minipura 5 Bow.



**[Fig. 11]** ECDIS view - 06:31, BPV on route to meet FV Minipura 5.

**[Fig. 12]** ECDIS view – 07:37, BPV approach and pre-boarding position of FV Minipura 5.

Department of Fisheries and Aquatic Resources  
Colombo, Sri Lanka  
Boat Departure Form

(1). Departure Form No : 531689  
(2). Boat Registration Number : BKULA187MTR  
(3). Boat Name : Minipura 5  
(4). National License No : 24822MUL1992MTR  
(5). High Seas License No : 24822MUL1992MTR  
(6). Name of the Owner : P. L. Abeyaratne  
(7). Owner's Contact No : 0778000045  
(8). Owner's Email : Thatindukashahya7@gmail.com

(9). Skipper Name : M.G.R.N. Fernando  
(10). Skipper's National Identity Card No:83022485  
(11). Skipper License Number: LC221C19W  
(12). Departure Port : Dikwella  
(13). Area of Fishing Operation : High Seas  
(14). Detail of Crew Members :

Name	National Identity Card Number
GDOS Samarasingha	180712193632
SAJU Ranjan	187008110056
LKM Eymenage	204418503464
SM Kaluarathna	LC2336-04
PSC Fernando	189109802053

78/96/1/2

දුරකථන සන්නිවේදන කමිසන්  
Telecommunications Regulatory Commission of Sri Lanka

MARITIME LICENCE (MARITIME MOBILE)

License No: MM-0020139  
Period of Validity: From 12/07/2015 to 14/07/2021

1. The Telecommunications Regulatory Commission of Sri Lanka, hereafter referred to as "the Commission" is the holder of the licence issued under the provisions of the Telecommunications Act No. 11 of 2008, as amended, under the authority conferred on it by the Commission of Sri Lanka.

2. The Commission has issued this licence to the holder of the licence, who is authorized to use the radio frequency spectrum for the purpose of providing maritime mobile services in the maritime area of the country.

3. The Commission has issued this licence to the holder of the licence, who is authorized to use the radio frequency spectrum for the purpose of providing maritime mobile services in the maritime area of the country.

TABLE	
1. Name of the Licensee	M. G. R. N. Fernando
2. Name of the Vessel	MINIPURA 5
3. Name of the Operator	SAJU RANJAN
4. Name of the Vessel	MINIPURA 5
5. Name of the Vessel	MINIPURA 5

Fig. 1 of 1

**[Fig. 13]** Boat Departure Form no. 531689, page 1.

**[Fig. 14]** Radio Maritime Licence MM-0020139

Department of Fisheries and Aquatic Resources  
Colombo, Sri Lanka  
Fishing Licence (National Sea)

Boat Name: Minipura 5  
License No: 24822MUL1992MTR  
Skipper Name: M.G.R.N. Fernando  
Skipper's National Identity Card No: 83022485

Name	National Identity Card Number
GDOS Samarasingha	180712193632
SAJU Ranjan	187008110056
LKM Eymenage	204418503464
SM Kaluarathna	LC2336-04
PSC Fernando	189109802053

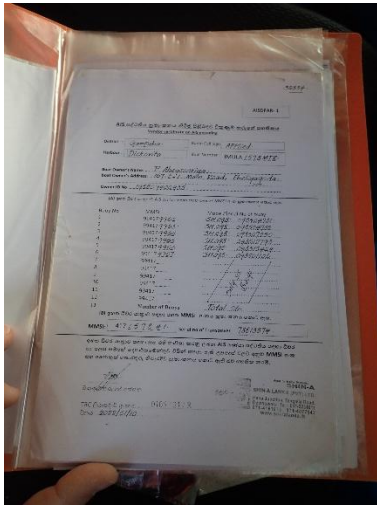
Department of Fisheries and Aquatic Resources  
Colombo, Sri Lanka  
Fishing Licence (High Seas)

Boat Name: Minipura 5  
License No: 24822MUL1992MTR  
Skipper Name: M.G.R.N. Fernando  
Skipper's National Identity Card No: 83022485

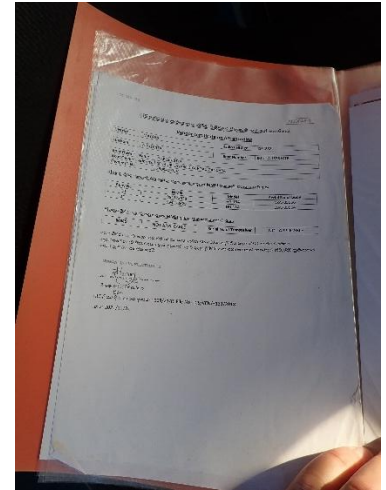
Name	National Identity Card Number
GDOS Samarasingha	180712193632
SAJU Ranjan	187008110056
LKM Eymenage	204418503464
SM Kaluarathna	LC2336-04
PSC Fernando	189109802053

**[Fig. 15]** FV Minipura 5 Fishing Licence (National Sea)

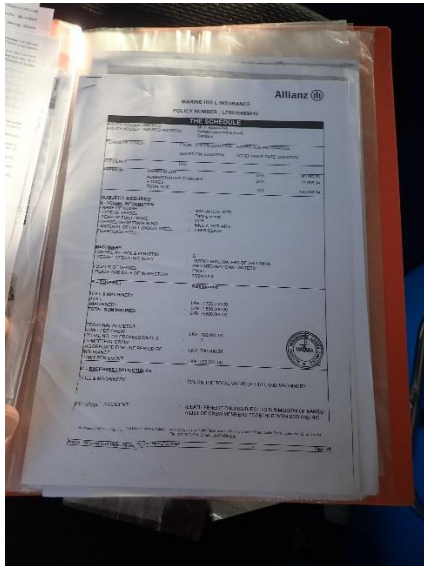
**[Fig. 16]** FV Minipura 5 Fishing Licence (High Seas)



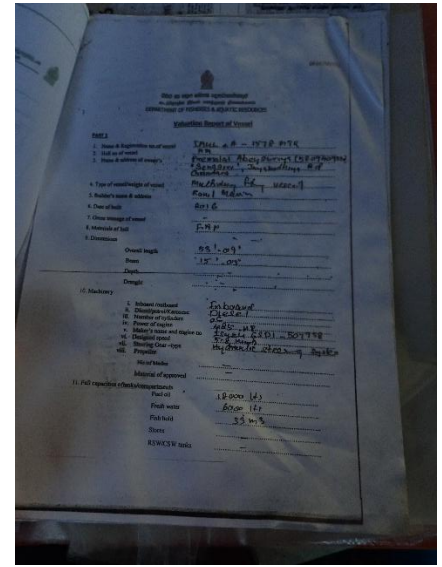
[Fig. 17] Certificate of AIS encoding



[Fig. 18] Certificate of AIS encoding, page 2



[Fig. 19] FV insurance, from 20/04/2024 to 20/04/2025



[Fig. 20] FV valuation report, page 1, stating engine power



**[Fig. 28]** Nav system, displaying boarding position, NE BIOT, 03°39.979'S 73°42.666'E.



**[Fig. 29]** Same as Fig. 28, showing starting points, SW of BIOT, previous fishing locations of FV Minipura 5.



**[Fig. 30]** VMS BlueTraker ConBox 2018, not operational. Red light blinking, connection between the transponder and ConBox not established.



**[Fig. 31]** Hold 1.



**[Fig. 33]** Hold 1, 3 tons of bagged tuna.



**[Fig. 35]** Hold 2, shark in ice.



**[Fig. 36]** Hold 2



**[Fig. 37]** Hold 3.



**[Fig. 38]** Fishing gear, bags of longline.



**[Fig. 39]** Fishing gear, one of three drums with hooks on wire trace.



**[Fig. 40]** Fishing gear, one of two drums with hooks with squid-shape lures.



**[Fig. 41]** Fishing gear, all five drums with hooks.



**[Fig. 42]** Fishing gear, gillnet, first bundled pile.



**[Fig. 43]** Fishing gear, gillnet, second bundled pile.

## ANNEX I

### IOTC REPORTING FORM FOR ILLEGAL ACTIVITY

Recalling IOTC Resolution 24/03 On establishing a list of vessels presumed to have carried out illegal, unreported and unregulated fishing in the IOTC Area, attached are details of illegal activity recorded by UK(OT) in British Indian Ocean Territory.

#### A. Details of Vessel

(Please detail the incidents(s) in the format below)

Item	Definition	Indicate
a	Current Name of Vessel (Previous name/s, if any)	MINIPURA 5 IMULA1578MTR
b	Current Flag (previous flag/s, if any)	Sri Lanka
c	Date first included on IOTC IUU Vessel List (if applicable)	N/A
d	Lloyds IMO Number, if available	N/A
e	Photo	Yes
f	Call Sign (previous call sign, if any)	Unknown
g	Owner (previous Owner/s, if any)	P. ABEYSOORIYA
h	Operator (previous Operator/s, if any) and Master/Fishing Master	P. ABEYSOORIYA and M.G.R.N. FERNANDO
i	Date of alleged IUU fishing activities	08/01/2025
j	Position of alleged IUU fishing activities	-3.666667 S 73.701667 E
k	Summary of alleged IUU activities (see section B for more detail)	(a).Not on RAV (expired 15/12/2025)  (k).Contravention of IOTC CMMs (e.g. Logbook not presented. VMS not fully operational.)
l	Summary of any actions known to have been taken in respect of the alleged IUU fishing activities	Master given verbal warning. CPC informed and an investigation initiated
m	Outcome of actions taken	Investigation ongoing

## B. Details of IOTC Resolution Elements Contravened

(Indicate with a "X" the individual elements of IOTC Resolution 24/03 contravened, and provide relevant details including date, location, source of information. Extra information can be provided in an attachment if necessary.)

That a vessel has, within the IOTC Area and in relation to species covered by the IOTC Agreement or by IOTC Conservation and Management Measures:

Item	Definition	Indicate
a.	engaged in fishing or fishing related activities and is neither registered on the IOTC Record of Authorised Vessels in accordance with Resolution 15/04 [superseded by <a href="#">Resolution 19/04</a> ], nor recorded in the Active list of vessels; or	X
b.	engaged in fishing or fishing related activities when its flag State is without quota, catch limit, or effort allocation under IOTC Conservation and Management Measures where applicable; or	
c.	failed to record or report its catches in accordance with IOTC Conservation and Management Measures or has made false reports; or	
d.	taken or landed undersized fish in contravention of IOTC Conservation and Management Measures; or	
e.	engaged in fishing or fishing related activities during closed fishing periods or in closed areas in contravention of IOTC Conservation and Management Measures; or	
f.	used prohibited fishing gear in contravention of IOTC Conservation and Management Measures; or	
g.	transhipped fish to, or otherwise participated in joint operations with, support or re-supply vessels that are not included on the IOTC Record of Authorised Vessels or not on the Record of Vessels Authorised to receive transshipments at-sea in the IOTC Area or	
h.	engaged in fishing or fishing related activities in waters that are under the national jurisdiction of a coastal State without the permission or authorisation of that State or in contravention of the laws and regulations of that State (without prejudice to the sovereign rights of the State concerned to undertake enforcement measures against such a vessel); or	
i.	engaged in fishing or fishing related activities whilst being without nationality; or	
j.	engaged in fishing or fishing related activities having intentionally falsified or concealed its markings, identity or registration; or	



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Item	Definition	Indicate
k.	engaged in fishing or fishing related activities in contravention of any other binding IOTC Conservation and Management Measures;	X



### C. Associated Documents

Inspection Report titled: MB034\_ISHANI\_3\_20251211\_InspectionReport

Photographic Evidence titled: MB034\_ISHANI\_3\_20251211\_PhotographicEvidences

### D. Recommended Actions

Recommended Actions		Indicate
a	Notification to IOTC Secretariat only. No further action is recommended.	
b	Notification of illegal activity to IOTC Secretariat. Recommend notification of activity to flag State.	X
c	Recommended for inclusion on IOTC IUU list	



British Indian Ocean Territory Administration  
Foreign, Commonwealth and Development Office  
London SW1A 2AH

Mr. Susantha Kahawatta  
Director General  
Department of Fisheries and Natural Resources  
No. 10 New Secretariat  
Maligawatta, Colombo 10

21 January 2026

E-Mail: [dgdgar@gmail.com](mailto:dgdgar@gmail.com); [sjksusantha@yahoo.com](mailto:sjksusantha@yahoo.com)  
cc. Kalyani Hewapathirana, Director Operations [hewakal2012@gmail.com](mailto:hewakal2012@gmail.com)  
Ms. Kumari Vithana (Legal Officer DFAR) [kumari.n.vithana@gmail.com](mailto:kumari.n.vithana@gmail.com)  
Mr. Jayakody (Director Investigation DFAR) [hsfuinvestigation@gmail.com](mailto:hsfuinvestigation@gmail.com)

Dear Mr Kahawatta,

**Notification of vessel inspection on Sri Lankan Flagged vessel in BIOT waters: IMUL-A-1578-MTR (MINIPURA 5).**

On 8<sup>th</sup> January 2026, the Senior Fisheries Protection Officer inspected the vessel IMUL-A-1578-MTR (MINIPURA 5). The vessel was transiting through BIOT, the captain and crew were all cooperative and there was no evidence of illegal fishing. However, for your reference, the VMS on board was not functional, its authorisation on the IOTC RAV had expired the previous month (15/12/2025) and no logbook was presented when requested. Tuna products were on board and the captain showed they had been fishing to the southwest of BIOT. The vessel was therefore potentially in breach of IOTC CMMs 19/04 and 25/02 respectively.

I attach the relevant boarding report for reference, if you have any questions or require assistance, please do not hesitate to contact us. We look forward to your continued cooperation in combatting IUU.

Yours Sincerely

*Mike Vidler*

Michael Vidler  
BIOT Administrator, Director of Fisheries

James Moir Clark  
UK Delegation to IOTC

Attached 1) Boarding report for MINIPURA 5 (IMUL-A-1578-MTR)



British Indian Ocean Territory Administration  
Foreign, Commonwealth and Development Office  
London SW1A 2AH

Dr Paul DeBruyn  
Executive Secretary  
Indian Ocean Tuna Commission  
Mahe  
Seychelles

19 February 2026

Dear Dr DeBruyn,

**Resolution 24/03 On establishing a list of vessels presumed to have carried out IUU fishing in the IOTC Area of Competence: Sri Lankan flagged Vessel IMUL-A-0627-NBO - MONTLIGEN (IOTC No. None)**

As required in paragraphs 5 and 6 of Resolution 24/03 a completed IOTC Reporting form for Illegal Activity and accompanying evidence supporting: Presumed IUU fishing activity in BIOT waters; for the Sri Lankan flagged vessel IMUL-A-0627-NBO - MONTLIGEN is submitted with this letter.

The attached evidence shows that:

- The Senior Fisheries Protection Officer boarded and inspected the vessel IMUL-A-0627-NBO - MONTLIGEN on 24 November 2025 inside the BIOT MPA.
- On 25 November 2025, the BIOT Administration wrote to Sri Lanka and requested that they conduct a regulatory investigation into the activities of the vessel, and share any positional details.
- The vessel was not on the IOTC Record of Authorised Vessels, and was only licensed to fish within the Sri Lankan EEZ.
- The vessel had not submitted a request to transit BIOT waters.
- The gear on the vessel was on deck ready to be deployed and the captain declared that it was the first time that he intended to fish in BIOT. The vessel is presumed to be IUU fishing in waters that are under the national jurisdiction of a coastal State without permission or authorisation.
- The vessel was not detained for operational reasons and the Master was instructed to leave the FCMZ and return to Sri Lanka.
- DFAR provided details on 9 February 2026 of the actions it has taken. The BIOT Administration is grateful to Sri Lanka for the assistance and information provided towards combatting IUU. We note that the vessel has been detained and the fishing licence suspended; the Skipper and owner were summoned to DFAR and an enquiry initiated. However, specific details of the investigation have not been provided to BIOTA, including positional data as requested, nor the species found on board. The investigation is ongoing with a court case set for 26 February 2026.

Noting that the vessel had no IOTC species on board during inspection; but also noting that vessel was fishing in the IOTC area without authorisation to fish, we submit this vessel to IOTC Compliance Committee with recommendation a) ***‘Notification to IOTC Secretariat only. No further action is recommended.’*** and we call on Sri Lanka to take all necessary measures to strengthen its Flag State obligations to prevent IUU fishing in the IOTC Area. Furthermore, should the investigation by DFAR indicate that IOTC species were in the hold, then we reserve the option to resubmit this vessel for inclusion on the draft IUU vessels list.

I would be grateful if you could circulate this material for the information and consideration of the Compliance Committee. Thank you.

Yours sincerely

A handwritten signature in black ink, appearing to read 'J. Moir Clark', with a stylized flourish at the end.

Mr J Moir Clark

UK Delegation to IOTC

Supporting evidence: IOTC Reporting form for Illegal Activity and associated documentation for  
IMUL-A-0627-NBO – MONTLIGEN

## 1. SUMMARY

Date and time of boarding	24/11/2025
Patrol type and number	BIOP Rat-eradication
Vessel name	MONTLIJEN
Vessel type	LL
Vessel flag and port of reg.	LKA NEGOMBO
Vessel Registration No.	IMULA0627NBO
IOTC# (if registered)	
Vessel Captain's name	A . NISANTHA SOSA
SFPO	Marion BOURASSEAU
BPV crew assisting	
<p>Action Taken:</p> <p>BPV was anchored in the NE corner of the Peros Banhos lagoon when the FV was visually spotted by a member of the rat-eradication expedition, and reported to the officer on watch. After being located on the radar, the FV appeared to be steaming southeast on a course towards the Great Chagos Bank, inconsistent with a transiting course.</p> <p>The inspection revealed that the gear was on deck and ready to deploy, along with a floating anchor prepared for deployment. No bait was visible during the inspection, the catch in the fish hold was composed of sharks only, the appearance of eyes and skin indicating that they were recently caught.</p> <p>The FV had been issued a departure form from Negombo Harbour but had no VMS onboard. The only fishing licence presented was valid for Sri Lanka EEZ and the FV is not IOTC registered.</p> <p>AIS was set to receive-only mode. When switched to transmit the AIS signal from the FV remained invisible to the BPV.</p> <p>The FV targets sharks using hooks on wire trace.</p> <p>The captain denied having any gear currently in the water. He was therefore instructed to secure the fishing gear on deck and leave BIOT.</p>	

## 2. INITIAL SIGHTING DETAILS (from Initial Target Sighting Form)

Date and time of first sighting	24/11/2025 6:49						
Sighted by: <i>(insert name)</i>	Pete Haverson, expedition member			Radar		Visual	X
Position of target	5°12.55S 71°57.0 E						
Course	147	Speed	5.0	Range	3.4	Bearing	010
Time Fisheries Pennant and Sierra Quebec 3 raised	7:00			Time Vessel hailed on VHF CH16 and/or MF 2182 kHz		7:11	
Time target requested to stop and prepare for boarding.	7:40			Response to request for boarding.		Compliant	

Comment:

### 3. LAUNCHING OF RHIB

Time RIB launched	7:30	RIB Crew (Names)	William FARQUHAR, Kevin DUTHIE, Marion BOURASSEAU, Steven BROWN
<u>Comment:</u>			

### 4. BOARDING DETAILS

Date and time vessel boarded	24/11/2025	Position boarded	5°12.16S 71°58.94E
BPV crew assisting			
Language used by FV crew	English	Cards used (Y/N)	N
Language card numbers used			

### 5. CAPTAIN and CREW DETAILS

Captain's name	A . NISANTHA SOSA	Nationality	LKA
Captain's address	116/B, Adankanthiya, Ethaiae		
Captain's D.o.B	04/10/1984	No. of crew inc. Captain	5
Nationality of Crew	LKA		
Are any crew under 18 or have health issues (Y/N), if 'Y' provide details.	N		

### 6. VESSEL DOCUMENTS and REGISTRATION

Vessel Name	MONTLIGEN (Hull) / MONTALIJAN (Logbook) / MONTILIJEN (Departure form)
International Callsign	
Flag State	LKA
Authorisation to Fish/Fishing Licence No.	25EEZIMUL20368NBO
Valid from / to (dd/mm/yyyy)	22/09/2025 – 21/09/2026
Port of Registration	NEGOMBO
Registration Number	IMULA0627NBO
FV owner name and details (as per licence)	Kurukulasuriya Mery Montalijan Swanjini Fernando (KMMS FERNANDO)
Fishing logbook No.	LB LL-24 0864
Issuing Authority	DFAR Sri Lanka
Date of last logbook entry (dd/mm/yyyy)	30/09/2025
Position of last entry	First page

Boat Departure Form/Port Exit Documents (Y/N): if Y provide port and date of departure.	Y, Negombo 07/11/2025		
Insurance documentation (Y/N)	Y		
Names and addresses of owners	KMMS Fernando, NO 50, Custom Road, Negombo		
Overall length (ft/m)	12.453 m / 40'10"	Engine Power (KW/hp)	52hp
Other paperwork:			

## 7. INTERVIEW WITH CAPTAIN (informal – not under caution)

Time of interview	7:51	To or from fishing grounds	1 <sup>st</sup> time fishing in BIOT	Port of departure	Negombo
Fish onboard?	Y	Where caught?	outside	When caught?	
Destination			ETA		
<u>Comments:</u> Captain declares that it is the first time that he intended to fish in BIOT, he refused to tell where the catch present onboard was caught. He stated that they left port two weeks ago and have only caught small fish, not good enough, before coming to BIOT. He said that there were only sharks onboard and that they were targeting sharks only.					

## 8. VESSEL INSPECTION

Fishing gear type	Longline and small net				
<u>Comments</u> Nylon longline, about 600 hooks visible in 4 drums, mounted on wire trace, and about 200 hooks with squid-shape lures. 9 danbuoys on deck, 5 AIS gear marker, 7 bags of nylon longline.					
Catch onboard (estimated/reported t)	Estimated 1 ton of shark in ice + 100kg of dried small sharks				
IOTC species onboard (Y/N)	N	Endangered species onboard (Y/N)	N		
Description of catch	20 silvertip sharks visible in ice in the fish hold + 1 tiger shark About 100kg of dried shark apparently silvertip sharks				
<u>Comments:</u>					

## 9. BIOT ORDINANCE NON-COMPLIANCE (Y/N)

<b>Section 5 (1(c)):</b> Possession of sea cucumbers or molluscs	N
<b>Section 6 (1(a)):</b> Fishing using prohibited fishing gear	N
<b>Section 6 (2):</b> Possession of prohibited fishing gear	Y
<b>Section 7 (1):</b> Fishing without a license	N
<b>Section 9 (1):</b> Fishing gear not stowed and readily available for fishing	Y
<b>Section 16:</b> Obstruction of a Fisheries Protection Officer	N

<b>Other:</b>	
<u>Comments:</u> Fishing gear ready to be set in the water. Possession of wire trace.	

**10. IOTC IUU Activity (Resolution 24/03).** Applies to vessels, Owners, Operators and Masters that undertake fishing and fishing related activities, for IOTC species, or by IOTC Conservation and Management Measures (CMMs), within the IOTC Area.(Activities relevant to BIOT)

Para.	Definition of IUU Fishing Activities	Indicate (Y/N)
4) a.	Is the vessel engaged in fishing or fishing related activities and is neither registered on the IOTC Record of Authorised Vessels in accordance with Resolution 19/04, nor recorded in the Active list of vessels?	Y
4) c.	Has the vessel failed to record or report its catches in accordance with IOTC CMMs or has made false reports?	Y
4) d.	Has the vessel taken or landed undersized fish in contravention of IOTC CMMs?	N
4) f.	Has the vessel used prohibited fishing gear in contravention of IOTC CMMs?	N
4) g.	Has the vessel transhipped fish to, or otherwise participated in joint operations with, support or re-supply vessels that are not included on the IOTC Record of Authorised Vessels or not on the Record of Vessels Authorised to receive transhipments at-sea in the IOTC Area?	N
4) h.	Is the vessel engaged in fishing or fishing related activities in waters that are under the national jurisdiction of a coastal State without the permission or authorisation of that State or in contravention of the laws and regulations of that State?	Y
4) j.	Is the vessel engaged in fishing or fishing related activities having intentionally falsified or concealed its markings, identity or registration?	N
4) k.	Is the vessel engaged in fishing or fishing related activities in contravention of any other binding IOTC CMMs ( <b>indicate non-compliance with CMMs in Section 1.1</b> )?	Y

#### IOTC CMM Non-Compliance

Resolution	Subject	Indicate (X)
19/04	IOTC Record of vessels (documents/logbook/markings)	X
15/03	Vessel VMS (operational, tamperproof)	X
17/07	Illegal gear (largescale driftnets >2.5km)	
12/04	Turtle de-hookers and line cutters	
19/03	Capture and retention of mobulid rays	
17/05	Shark fins	
12/09	Thresher sharks	

#### Comments:

19/04 19. b): floats not marked with the letters or numbers of the vessel

Resolution	Subject	Indicate (X)
19/04 2.:	The vessel isn't authorized to fish in the IOTC area of competence	
15/03 1:	No VMS onboard	

### 11. SFPO ACTIONS TAKEN (Y/N)

Vessel and Master detained and escorted to DG	
FPN issued and catch and gear seized	
Master given verbal warning and released	X
No further action, vessel released	
<u>Comments:</u>	
Instructed to secure the gear and leave BIOT.	

### 12. DISEMBARKATION and RECOVERY

Time FV disembarked	8:31	Time RIB recovered to BPV	8:49
---------------------	------	---------------------------	------

### 13. VESSEL RECORDS and HISTORY

Vessel on IOTC register (Y/N)	N	IOTC number	
Date authorised from		Date authorised to	
Vessel currently authorised to fish in IOTC area of competence (Y/N)	N	IOTC database reference:	RAV online version
Vessel previously boarded (Y/N)	N	Inspection report ID	
Master previously boarded (Y/N)	N	Inspection report ID	
Owner previously boarded (Y/N)	N	Inspection report ID	
Crew previously boarded (Y/N)	Unk	Inspection report ID	
<u>Comments:</u>			

Marion BOURASSEAU  
BIOT Senior Fisheries Protection Officer

24/11/2025



[Fig.1] Portside



[Fig.2] Starboard side



[Fig.3] Stern



[Fig.4] Bow



[Fig.5] FV GPS tracker showing a stop on Speakers Bank



[Fig.6]. FV GPS tracker showing a non-transiting behaviour, near Peros Banhos



[Fig.7] Hold lid off: 5 compartments full of ice



[Fig.8]. Catch in hold



[Fig.9] Catch: bag of drying sharks



[Fig.10] Fishing gear: danbuoys ready to be set in the water and floating anchor unstowed

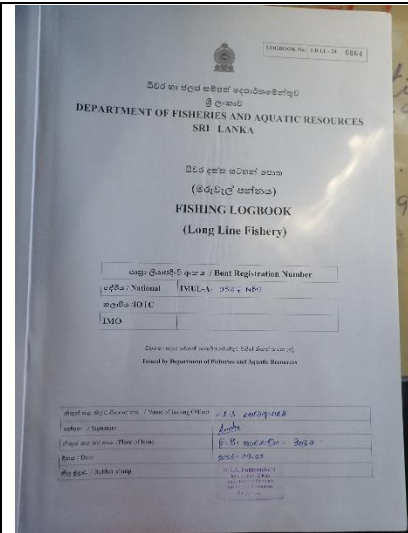


[Fig.11] Fishing gear: drum of hooks on wire trace

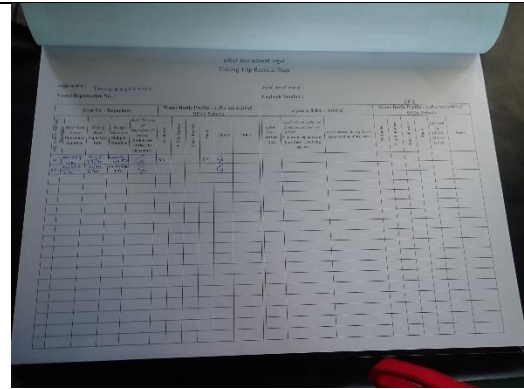


[Fig.12] Fishing gear: bags of longline

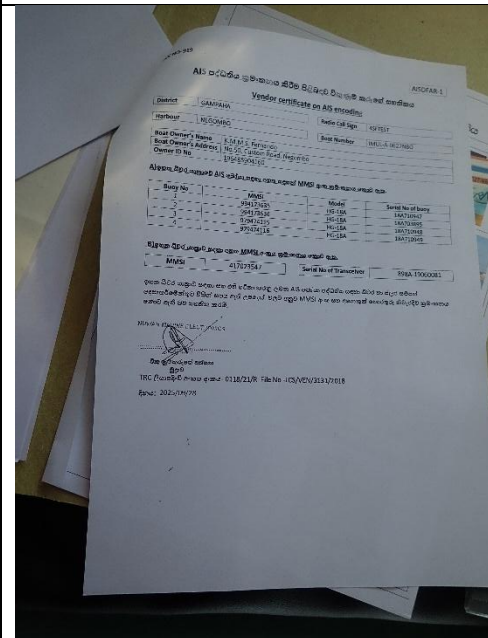




[Fig.17] Fishing logbook



[Fig.18] Fishing logbook last entry



[Fig.19] List of AIS gear markers



[Fig.20] AIS gear marker

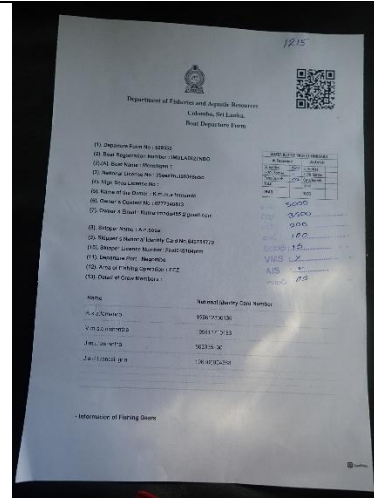


[Fig.22] AIS gear marker

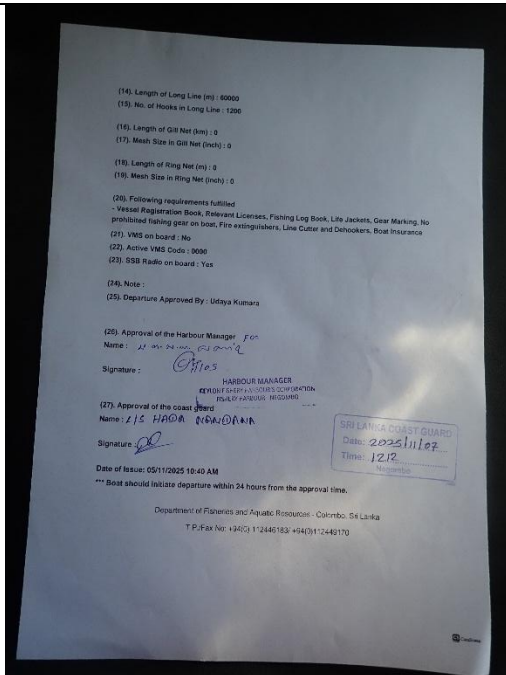
[Fig.21] AIS gear marker



[Fig.23] AIS gear marker



[Fig.24] Departure form



[Fig.25] Departure form, "VMS onboard: No"

## ANNEX I

### IOTC REPORTING FORM FOR ILLEGAL ACTIVITY

Recalling IOTC Resolution 24/03 On establishing a list of vessels presumed to have carried out illegal, unreported and unregulated fishing in the IOTC Area, attached are details of illegal activity recorded by UK(OT) in British Indian Ocean Territory.

#### A. Details of Vessel

(Please detail the incidents(s) in the format below)

Item	Definition	Indicate
a	Current Name of Vessel (Previous name/s, if any)	MONTLIJEN IMULA0627NBO
b	Current Flag (previous flag/s, if any)	Sri Lanka
c	Date first included on IOTC IUU Vessel List (if applicable)	N/A
d	Lloyds IMO Number, if available	N/A
e	Photo	Yes
f	Call Sign (previous call sign, if any)	Unknown
g	Owner (previous Owner/s, if any)	KMMS Fernando
h	Operator (previous Operator/s, if any) and Master/Fishing Master	KMMS Fernando and A . NISANTHA SOSA
i	Date of alleged IUU fishing activities	24/08/2025
j	Position of alleged IUU fishing activities	-5.2026667 S 71.9823 E
k	Summary of alleged IUU activities (see section B for more detail)	(a).Not on RAV (k).Contravention of IOTC CMMs (e.g. No VMS onboard. Marker buoys/floats not correctly marked.)
l	Summary of any actions known to have been taken in respect of the alleged IUU fishing activities	Reported to flag State. Master given verbal warning and instructed to leave the area
m	Outcome of actions taken	Court date set for 26.02.2026

## B. Details of IOTC Resolution Elements Contravened

*(Indicate with a "X" the individual elements of IOTC Resolution 24/03 contravened, and provide relevant details including date, location, source of information. Extra information can be provided in an attachment if necessary.)*

That a vessel has, within the IOTC Area and in relation to species covered by the IOTC Agreement or by IOTC Conservation and Management Measures:

Item	Definition	Indicate
a.	engaged in fishing or fishing related activities and is neither registered on the IOTC Record of Authorised Vessels in accordance with Resolution 15/04 [superseded by <a href="#">Resolution 19/04</a> ], nor recorded in the Active list of vessels; or	X
b.	engaged in fishing or fishing related activities when its flag State is without quota, catch limit, or effort allocation under IOTC Conservation and Management Measures where applicable; or	
c.	failed to record or report its catches in accordance with IOTC Conservation and Management Measures or has made false reports; or	
d.	taken or landed undersized fish in contravention of IOTC Conservation and Management Measures; or	
e.	engaged in fishing or fishing related activities during closed fishing periods or in closed areas in contravention of IOTC Conservation and Management Measures; or	
f.	used prohibited fishing gear in contravention of IOTC Conservation and Management Measures; or	
g.	transhipped fish to, or otherwise participated in joint operations with, support or re-supply vessels that are not included on the IOTC Record of Authorised Vessels or not on the Record of Vessels Authorised to receive transshipments at-sea in the IOTC Area or	
h.	engaged in fishing or fishing related activities in waters that are under the national jurisdiction of a coastal State without the permission or authorisation of that State or in contravention of the laws and regulations of that State (without prejudice to the sovereign rights of the State concerned to undertake enforcement measures against such a vessel); or	
i.	engaged in fishing or fishing related activities whilst being without nationality; or	
j.	engaged in fishing or fishing related activities having intentionally falsified or concealed its markings, identity or registration; or	



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Item	Definition	Indicate
k.	engaged in fishing or fishing related activities in contravention of any other binding IOTC Conservation and Management Measures;	X

### C. Associated Documents

Inspection Report titled: MB032\_MONTLIGEN\_20251124\_InspectionReport

Photographic Evidence titled: MB032\_MONTLIGEN\_20251124\_PhotographicEvidences

Notification of Vessel Inspection and Request for Assistance Letter, sent 25 November 2025. Titled: 20251125\_BIOT\_DFAR\_Montligen\_IMULA0627NBO

Cancellation of Vessel Departure Form titled: Sri\_Lanka\_Vessel Departure Form\_Cancellation

### D. Recommended Actions

Recommended Actions		Indicate
a	Notification to IOTC Secretariat only. No further action is recommended.	
b	Notification of illegal activity to IOTC Secretariat. Recommend notification of activity to flag State.	X
c	Recommended for inclusion on IOTC IUU list	



British Indian Ocean Territory Administration  
Foreign, Commonwealth and Development Office  
London SW1A 2AH

Mr. Susantha Kahawatta  
Director General  
Department of Fisheries and Natural Resources  
No. 10 New Secretariat  
Maligawatta, Colombo 10

25 November 2025

E-Mail: [dgdgar@gmail.com](mailto:dgdgar@gmail.com); [sjksusantha@yahoo.com](mailto:sjksusantha@yahoo.com)  
cc. Kalyani Hewapathirana, Director Operations [hewakal2012@gmail.com](mailto:hewakal2012@gmail.com)  
Ms. Kumari Vithana (Legal Officer DFAR) [kumari.n.vithana@gmail.com](mailto:kumari.n.vithana@gmail.com)  
Mr. Jayakody (Director Investigation DFAR) [hsfuinvestigation@gmail.com](mailto:hsfuinvestigation@gmail.com)

Dear Mr Kahawatta,

**Notification of vessel inspection on Sri Lankan Flagged vessel in BIOT waters: IMUL-A-0627-NBO (Montligen).**

On 24<sup>th</sup> November 2025 the Senior Fisheries Protection Officer inspected the vessel IMUL-A-0627-NBO (Montligen). The vessel was found inside the BIOT MPA, and although no fishing gear was seen in the water there were shark on board that appeared to be freshly caught. The vessel was not on the usual transit route and the captain declared that this was the first time he intended to fish in BIOT waters. The captain was instructed to leave BIOT. The vessel had been issued a departure form from Negombo harbour but did not have a VMS on board, it was only licensed to fish within the Sri Lankan EEZ and was not on the IOTV Record of Authorised Vessels.

We would be grateful if you could investigate the activities of this vessel. Although no VMS was recorded onboard, if any does exist could you share it or any other positional data with us from them from 1<sup>st</sup> November 2025 up to today.

I attach the relevant boarding report for reference, if you have any questions or require assistance, please do not hesitate to contact us. We look forward to your continued cooperation in combatting IUU.

Yours Sincerely

Michael Vidler  
BIOT Administrator, Director of Fisheries

James Moir Clark  
UK Delegation to IOTC

Attached 1) Boarding report for Montligen (IMUL-A-0627-NBO)

## **Vessel Activity Notification - Bandar Nelayan 16** **Allegations of IUU fishing conducted within the Indian Ocean region**

The [Environmental Justice Foundation](#) (EJF) exists to protect the natural world and defend our basic human right to a secure environment.

EJF works internationally to inform policy and drive systemic, durable reforms to protect our environment and defend human rights. We investigate and expose abuses and support environmental defenders, Indigenous peoples, communities and independent journalists on the frontlines of environmental injustice. Our campaigns aim to secure peaceful, equitable and sustainable futures.

EJF is committed to combating illegal, unreported and unregulated (IUU) fishing. To this end, EJF gathers information on fishing vessels' activities by conducting interviews with former crew from fishing vessels and through the use of Starboard and other online platforms that allow for the observation of vessels equipped with an Automatic Identification System (AIS).

### **Introduction:**

Through extensive field-based investigations and desk-based research, EJF has been made aware of allegations of illegal fishing carried out on board the BANDAR NELAYAN 16 (IMO - 8787911) - an Indonesian-flagged fishing vessel.<sup>1</sup> These activities include the capture of protected cetacean species, shark finning, and the disposal of bodies at sea.

EJF submitted a Vessel Activity Notification (VAN) concerning the BANDAR NELAYAN 16 and nine other vessels to the Indonesian Ministry of Maritime Affairs and Fisheries (MMAF) in January 2025, urging further investigation. This new VAN presents detailed and fresh allegations of nearly identical IUU fishing infractions. This VAN provides new crew testimonies, additional IUU fishing infractions, and updated footage from the latest fishing vessel trip in 2024.

EJF interviewed four crew members who worked on the vessel throughout 2024. The crew's testimony includes allegations of illegal fishing practices, including the killing of protected cetacean species. The crew describe intentionally harpooning a false killer whale for the purpose of taking its teeth as souvenirs. They also mentioned the catching and finning of sharks, disposing of their bodies at sea, and retaining protected species such as thresher sharks.

These behaviours contravene Indonesian regulations (MMAF Regulation No. 58 of 2020 concerning Capture Fisheries Business<sup>2</sup>) but also those for the Indian Ocean Tuna Commission (IOTC) and Commission for the Conservation of Southern Bluefin Tuna (CCSBT) - two overlapping regional fisheries management organisations (RFMOs) in the area in which the BANDAR NELAYAN 16 operated throughout 2024.

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<sup>1</sup> Ministry of Marine and Fisheries (2025) Vessel fishing license for Bandar Nelayan 16 <https://perizinan.kkp.go.id/grid.php?target=aktif&doc=6&q=>

<sup>2</sup> Article 111 paragraph (1) of the Minister of Marine Affairs and Fisheries Regulation No 58 of 2020 concerning Capture Fisheries Business

### Identification:

Name	Call sign/IMO	Current location	CCSBT record	IOTC record
BANDAR NELAYAN 16 <sup>3</sup>	YEA5242/8787911	Benoa port	Until 31/12/25 <sup>4</sup>	Until 31/12/25 <sup>5</sup>

It should be noted that the BANDAR NELAYAN 16 was authorised to conduct fishing operations within the IOTC area at the time of writing. AIS vessel tracking via Global Fishing Watch indicates the vessel left Benoa Port in June 2025, with its latest position recorded in October 2025 in FAO Major Fishing Area 57, Indian Ocean.<sup>67</sup>

According to the S&P Global Maritime portal, the fishing vessel is operated by PT. BANDAR NELAYAN (Address: Jalan Ikan Tuna IV 8, Kel Pedungan, Denpasar, 80223, Indonesia). This company is stated to operate 91 fishing vessels and 3 fish carrier vessels. All of these vessels are named BANDAR NELAYAN followed by a number. IOTC records for the BANDAR NELAYAN 16 indicate that the vessel is owned by the individual – Richi Richado – as is the case for several other vessels named BANDAR NELAYAN followed by numbers.<sup>8</sup>

According to available trade data, PT. BANDAR NELAYAN, since 2015, has actively sent their catches to the US, Vietnam, China and Taiwan.<sup>9</sup> The company's (now inactive) website also lists Vietnam, Thailand, China, Taiwan, Japan, the USA and the European Union as markets for yellowfin tuna, albacore tuna, swordfish, and other tuna-like species products.<sup>10</sup> The company is listed as authorised to export fishery products to the EU as of the time of writing (approval number: 564.14.B).<sup>11</sup>

### Potential IUU fishing violations:

Table 1. Summary of sharks and other species identified by the crew to have been caught by the vessel:

Species name	IUCN Red List Classification	CITES	IOTC CMM	Source
Blue shark ( <i>Prionace glauca</i> )	Near Threatened	-	-	Crew interview(s)
Shortfin mako shark ( <i>Isurus oxyrinchus</i> )	Endangered	Appendix II	-	Crew interview(s)

<sup>3</sup> IOTC (2025) Vessel record for Bandar Nelayan 16 <https://rav.iotc.org/fe/record/IOTC002394>

<sup>4</sup> CCSBT (2025) Vessel record for Bandar Nelayan 16 <https://www.ccsbt.org/en/content/bandar-nelayan-16-5>

<sup>5</sup> IOTC (2025) Vessel record for Bandar Nelayan 16 <https://rav.iotc.org/fe/record/IOTC002394>

<sup>6</sup> Global Fishing Watch (2025) Bandar Nelayan 16

<sup>7</sup> FAO (2023) FAO Major Fishing Areas: Indian Ocean, Eastern (Major Fishing Area 57), <https://www.fao.org/fishery/en/area/57/en>

<sup>8</sup> IOTC (2025) Vessel record for Bandar Nelayan 16 <https://rav.iotc.org/fe/record/IOTC002394>

<sup>9</sup> ImportYeti (2025) Bandar Nelayan customers, <https://www.importyeti.com/supplier/bandar-nelayan-jl-ikan-tuna-iv>

<sup>10</sup> <https://web.archive.org/web/20181104050821/http://www.bandarnelayan.com/index.html>

<sup>11</sup> [https://webgate.ec.europa.eu/tracesnt/directory/listing/establishment/publication/index#!/view/ID/FISHERY\\_PRODUCTS](https://webgate.ec.europa.eu/tracesnt/directory/listing/establishment/publication/index#!/view/ID/FISHERY_PRODUCTS)

<sup>27</sup> EJF (2024) Interview with fisher from Bandar Nelayan 16

Pelagic thresher ( <i>Alopias pelagicus</i> )	Endangered	Appendix II	Resolution 12/09	Crew interview(s) Social media
False killer whale ( <i>Pseudorca crassidens</i> )	Near Threatened	Appendix I	Resolution 23/06	Crew interview(s)

EJF interviewed four crew members from the BANDAR NELAYAN 16 who worked on the vessel between late 2023 and late 2024 (exact dates are not provided to protect crew identities). The vessel also appears to have engaged in the catching and finning of sharks. The crew described how they would remove the heads and innards of the shark, and then separate the fins from the bodies. The shark bodies would then be transhipped to a collecting vessel at sea, whilst the fins would be packed into sacks until they were unloaded at Benoa port at the end of the trip. These practices of processing protected shark species, such as thresher sharks, are prohibited under IOTC Resolution 12/09<sup>12</sup> and CCSBT bycatch mitigation measures.<sup>13</sup> For shortfin mako sharks, the crew would throw the shark bodies into the sea. This behaviour could be in violation of IOTC Resolution 25/08.<sup>14</sup>

*“It is like catching fish in a pond. It [sharks] is pulled and lifted...Only the body and the fins were taken...They were separated...There were six sacks of fins...It [fins] was taken to the shore.”*

Interview with a fisher from the BANDAR NELAYAN 16.

*“We often caught thresher sharks...For the thresher sharks, we took their fins and bodies...Their tails were thrown away.”*

Interview with a fisher from the BANDAR NELAYAN 16.

These acts are clear breaches of Article 109 of MMAF Regulation No. 58 of 2020, which stipulates that bycatch that is ecologically related to tuna fisheries (ecologically related species) in the form of sharks must be landed intact.<sup>15</sup> The catching and processing of both entire bodies and fins of thresher sharks (*family Alopiidae*) is also a breach of Article 112 of MMAF Regulation No. 58 of 2020, which states that bycatch in the form of thresher sharks must be released alive.<sup>16</sup>

*“Yes, that's the shortfin mako shark. I think we caught them five to ten times. So, we only took their fins and threw their bodies away.”*

Interview with a fisher from the BANDAR NELAYAN 16.

<sup>12</sup> <https://faolex.fao.org/docs/pdf/mul165290.pdf>

<sup>13</sup> CCSBT (2023) Bycatch Mitigation: Binding Measures, <https://www.ccsbt.org/en/content/bycatch-mitigation>

<sup>14</sup> CCSBT (2023) Bycatch Mitigation: Binding Measures, <https://www.ccsbt.org/en/content/bycatch-mitigation>

<sup>15</sup> Article 109, MMAF Regulation No. 58 of 2020

<sup>16</sup> Article 112, MMAF Regulation No. 58 of 2020

The vessel also caught false killer whales, with the crew ordered to take their teeth as souvenirs. Such catching and retention of false killer whales could be in contravention of IOTC Resolution 23/06<sup>17</sup> and CCSBT bycatch mitigation measures (See Appendix 2).<sup>18</sup>



Photos taken by two different crew members from the BANDAR NELAYAN 16: The teeth of a false killer whale, reportedly caught during the fishing trip, were shaped into a pendant and a ring.

*“We caught the false killer whale...one got on board, and the other one got loose...we only took their teeth..I made a necklace out of it”.*

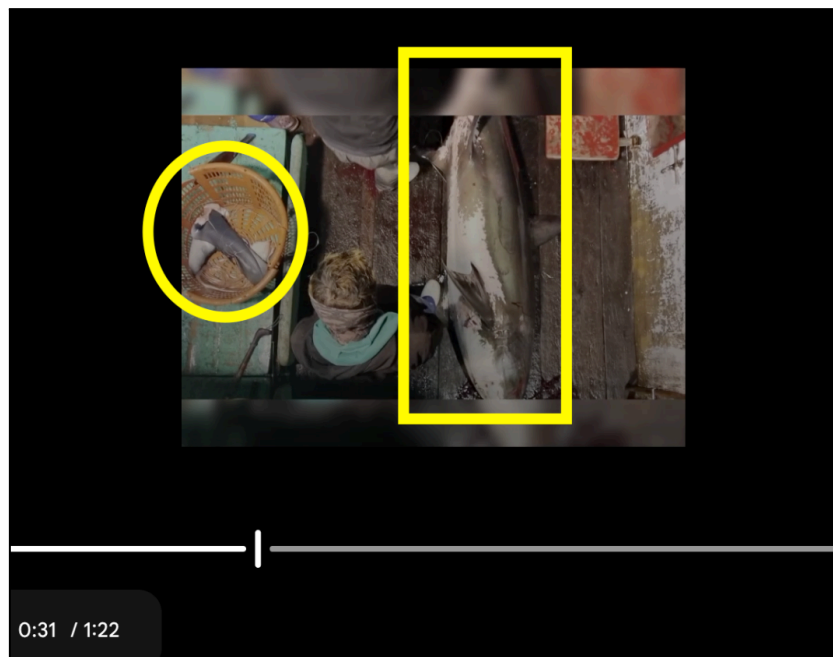
Interview with a fisher from the BANDAR NELAYAN 16.

<sup>17</sup> <https://faolex.fao.org/docs/pdf/mul221502.pdf>

<sup>18</sup> CCSBT (2023) Bycatch Mitigation: Binding Measures, <https://www.ccsbt.org/en/content/bycatch-mitigation>



Photo sent to EJF by a fisher from the BANDAR NELAYAN 16 showing crewmembers posing with a thresher shark with a hook embedded in its body. The orange broken bucket was described to EJF as a temporary place to hold shark fins. The photo timestamp indicates this photo was taken in late 2023 (exact dates are not provided to protect crew identities).

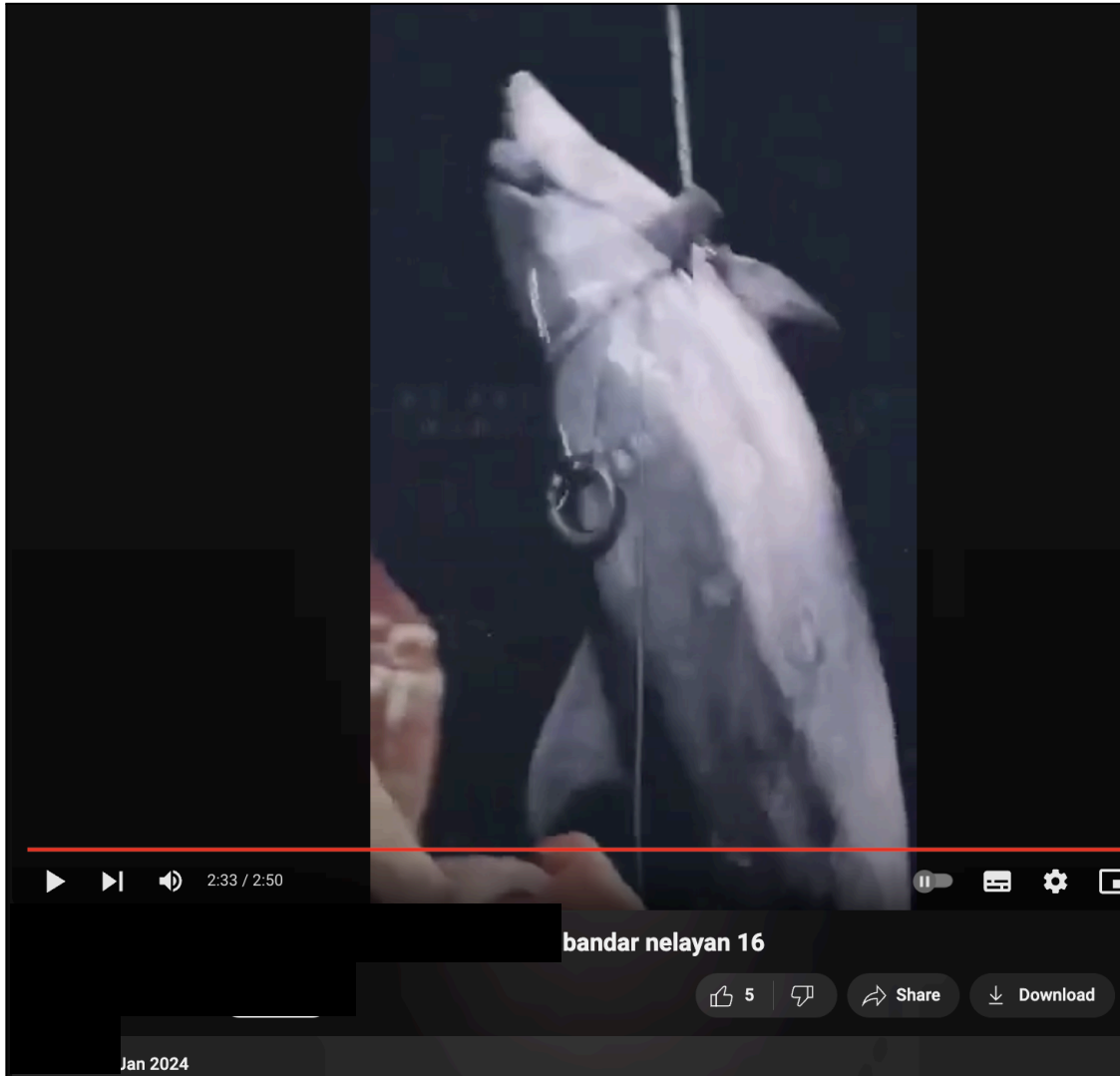


A screenshot taken from a video shared with EJF shows a shark being processed. The yellow box shows the body of a thresher shark. The yellow circle shows the broken orange bucket used as a temporary place to hold shark fins. This is the same bucket as indicated in the previous photo.



The photo shows crew members posing with a thresher shark. Again, the same coloured orange buckets are present. The timestamp indicates it was taken in early 2024 (the exact date is not provided to protect crew identities).

In addition, social media analysis has identified the BANDAR NELAYAN 16 as potentially having engaged in the catching of a dolphin (video uploaded to YouTube on January 7, 2024) and a thresher shark (video uploaded on January 26, 2024). It is not possible to determine when the videos were taken.



A screenshot taken from a YouTube video (posted in January 2024) showing a dolphin being lifted onto the deck of the BANDAR NELAYAN 16.



A screenshot taken from a YouTube video shows a thresher shark being lifted onto the deck of the BANDAR NELAYAN 16.

**Potential forced labour violations:**

The four crew members interviewed reported excessive working hours as the only major labour violation. The crew described having to work 16 to 18 hours a day. According to the International Labour Organization, being made to work more than 14 hours a day is an indicator of forced labour.

## **Supply chain linkages to the US**

EJF utilised Trade Data Pro, a subscription service that gathers import and export customs data from various global sources, to establish supply chain links between BANDAR NELAYAN, PT - the parent company of the BANDAR NELAYAN 16 - and international seafood markets.

According to Trade Data Pro, since 2023, BANDAR NELAYAN, PT has shipped 215 consignments to the U.S., totalling approximately 4,305 tons valued at \$15.61 million.<sup>19</sup> The primary commodities were frozen tuna, swordfish, and squid. These products are imported into the U.S. by leading companies such as Osama Corporation, Indo Merchandise, and Imaex.<sup>20</sup>

BANDAR NELAYAN, PT is registered to export to the US market under FDA No. 19212269512.<sup>21</sup>

## **Supply chain linkages to the EU**

Under the auspices of DG SANTE (the European Commission's Directorate-General for Health and Food Safety), the EU publishes a list of non-EU establishments that are authorised to export to the EU, which includes the names of processing plants from which seafood sold on the EU market can be sourced. While this list pertains to food hygiene, and an establishment's presence on the list does not necessarily confirm active supply, it can serve as a useful indicator that seafood from a given establishment may be entering the EU market.

PT. BANDAR NELAYAN is included on the list of Indonesian establishments that are authorised to export to the EU (Approval number 564.14.B).<sup>22</sup>

## **Supply chain linkages to Asia**

As reported by Trade Data Pro, since 2023, BANDAR NELAYAN, PT has been actively exporting products to Asian markets, including the Philippines.<sup>23</sup> Shipments to the Philippines primarily consisted of frozen tuna, with a total of 269 tons valued at \$508,000. Two import companies in the Philippines, King Belly Seafood and Dav Seatic, are leading these imports.<sup>24</sup>

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<sup>19</sup> Trade Data Pro (2025)

<sup>20</sup> Trade Data Pro (2025)

<sup>21</sup> Trade Data Pro (2025)

<sup>22</sup>The EU Commission (2025)

<https://webgate.ec.europa.eu/tracesnt/directory/listing/establishment/publication/index#!/search?classificationSectionChapter=food&countryCode=ID>

<sup>23</sup> Trade Data Pro (2025)

<sup>24</sup> Trade Data Pro (2025)

## **Recommendations:**

### *Immediate investigations:*

EJF recommends that the Indonesian MMAF, Directorate-General of Surveillance and Control of Marine and Fishery Resources (PSDKP) and Directorate General of Capture Fisheries (DJPT) review the allegations detailed in this alert and furthermore:

- Confirm whether the BANDAR NELAYAN 16 identifications and fishing authorisations provided in this notification are accurate and up to date.
- Conduct a full investigation into the fishing activities of the aforementioned vessel, including physical inspections of the vessel and interviews with the captain and crew to establish whether or not IUU fishing infractions in breach of MMAF Regulation No. 58 of 2020 and/or IOTC/CCSBT Resolutions occurred. Suspend the license of the vessel during the course of this investigation and prevent the vessel from leaving port.
- Use forensic photographic analysis to confirm whether the photos and video screenshots provided in this notification were taken onboard the BANDAR NELAYAN 16.
- Collect and verify logbook information and other available historical documentation related to the catch of this vessel to establish whether it caught and conducted the finning and separation of shark fins of any species of sharks (including thresher sharks) before landing on previous fishing trips within the IOTC and/or CCSBT areas.
- If the vessel is found to have operated without appropriate authorisations, caught and finned protected shark species and/or cetaceans, appropriate and deterrent enforcement action should be taken by the MMAF and PSDKP where possible.

### *Addressing capacity gaps in inspection regimes and compliance mechanisms:*

The IUU fishing infractions reported on board this vessel demonstrate an urgent need to address capacity gaps in port-side inspection protocols. EJF's own observations of port-side inspections at Benoa port in Bali have identified a number of issues which have the potential to facilitate IUU fishing. EJF provides the following recommendations to address these gaps and improve compliance with existing Indonesian and RFMO regulations:

- Continued non-compliance with both Indonesian fishing regulations and RFMO conservation and management measures demonstrates a lack of transparency, accountability and scrutiny in Indonesian distant water fishing operations. The MMAF should set about implementing the transparency mechanisms of the Global Charter for Fisheries Transparency as soon as possible.<sup>25</sup> Such adoption would help reassure global buyers of Indonesian seafood that these products are not tainted by IUU fishing or associated labour abuses.
- The MMAF should establish a risk-based approach to combating IUU fishing that takes into consideration a number of risk factors such as main target species, fishing area, days

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<sup>25</sup> Coalition for Fisheries Transparency (2023), Global Charter for Fisheries Transparency, <https://fisheriestransparency.net/wp-content/uploads/2023/03/ONEPAGER-FINAL.pdf>

at sea per fishing trip, propensity to engage in at-sea trans-shipment, history of IUU fishing or labour violations, etc. Vessels that receive a high-risk classification should be prioritised for inspections, subjected to at-sea inspections, and prioritised for the installation of monitoring systems such as onboard CCTV cameras and human observers.

- The PSDKP, DJPT, harbourmaster and other relevant agencies must urgently formulate and distribute new port-side inspection protocols to be applied nationwide. These must clearly designate which agencies are responsible for what aspect of vessel inspections and in what order. This will reduce confusion and overlapping jurisdictions whilst also improving the effectiveness of training programs provided to relevant agencies.
- Such a port-side inspection protocol should also follow a strictly risk-based approach to ensure that maximises the effectiveness of available inspection resources and facilitates higher quality, more in-depth inspections of high-risk vessels. For example, inspectors could be expected to inspect 100% of high-risk vessels, 60% of medium-risk vessels, and 30% of low-risk vessels. Low-risk vessels could be inspected according to a proportional inspection schedule depending on available inspection resources and the number of days per fishing trip.
- The Government of Indonesia should reinforce MMAF Regulation Number 33 of 2021 so that harbourmasters are no longer authorised to allow vessels to unload catch unless they have been inspected and given approval to unload from the PSDKP. Additionally, considering the powers of harbourmasters as outlined in Article 218 of the Shipping Law, which grants them authority to conduct seaworthiness and safety inspections of both Indonesian-flagged and foreign-flagged ships at Indonesian ports, incorporating amendments into this law could also be beneficial. This law empowers harbourmasters to inspect vessels and seek information to gather evidence about marine casualties. If vessels arrive during hours when PSDKP officials are not on duty, they must be required to wait.
- Relevant government agencies including the DJPT and PSDKP must urgently review and distribute a port-side inspection standard operating procedure (SOP) that clearly lists all relevant aspects of the fishing vessel that must be inspected. This should include aspects related to fisheries as well as to labour issues.
- To prevent further national inconsistencies in port-side inspection regimes it is vital that the DJPT and PSDKP follow this SOP and/or checklist for every inspection.
- Vessel inspectors should be required to sign off against each element of the vessel inspection checklist to confirm that each element has been completed to a satisfactory standard.

**Appendix 1: Faded paint pattern on the side of the ship where the processing of the thresher shark took place**

Video obtained by EJF staff from crew documentation. The off-white paint (orange line) near the window appears to have a unique shape, with a peak that aligns with the window lock next to it.



The left picture shows the crew cutting off the tail of the thresher shark - Not the presence of the faded paint in all of these images.

## **Appendix 2. Indonesian and RFMO regulations**

### **Indonesian laws and regulations:**

Under MMAF Regulation No. 58 of 2020, which covers Indonesian-flagged vessel operations in RFMO areas, the capture of juvenile and pregnant sharks, as well as the practice of shark finning, is prohibited.<sup>26,27</sup> Sharks are required to be landed whole.<sup>28</sup>

Certain species of sharks, such as thresher sharks, oceanic whitetip sharks, whale sharks, and silky sharks, must be released at sea if accidentally caught, and all such occurrences must be recorded in the logbook.<sup>29</sup> Furthermore, the landing, trans-shipment, retention, or sale of these shark species, whether in part or whole, is forbidden.<sup>30</sup> Violations of these requirements will lead to administrative sanctions. These sanctions include written warnings, Fishing Permit (SIPI) suspension, and SIPI licence revocation.<sup>31</sup>

Fishing vessels are also mandated to release any accidentally caught marine mammals, including cetaceans such as false killer whales.<sup>32</sup> If marine mammals are found dead, the vessel's captain is required to record these in the logbook.<sup>33</sup> The regulation, however, does not further specify the sanctions for such violations.

The regulation also prohibits the intentional capture of certain fish species subject to conservation measures established by the RFMOs.<sup>34</sup> Violations of this provision fall under the category of IUU fishing.<sup>35</sup> Fishing vessels found engaging in such activities are subject to administrative sanctions.<sup>36</sup>

### **IOTC Resolutions:**

**Resolution on catching and retaining of thresher sharks:** Under IOTC Resolution 12/09: *“Fishing Vessels flying the flag of an IOTC Member or Cooperating non-Contracting Party (CPCs) are prohibited from retaining on board, transshipping, landing, storing, selling or offering for sale any part or whole carcass of thresher sharks of all the species of the family Alopiidae...”*<sup>37</sup>

**Resolution on catching and retaining of cetaceans (false killer whales and dolphins):** Under IOTC Resolution 23/06: *“CPCs using other gear types fishing for tuna and tuna-like species associated with cetaceans shall report all interactions with cetaceans to the relevant authority of the flag State and include all the information outlined in paragraph 3b(i–vi).”*<sup>38</sup>

*The information outlined in paragraph 3b(i–vi) includes: (i) the species (if known); (ii) the number of individuals; (iii) a short description of the interaction...; (iv) the location of the encirclement; (v) the steps taken to ensure safe release; (vi) an assessment of the life status of the animal on release.”*

**Resolution on catching and retaining of oceanic whitetip sharks:** Under IOTC Resolution 13/06: *“CPCs shall require fishing vessels flying their flag and on the IOTC Record of Authorised Vessels or authorised*

<sup>26</sup> Article 109 paragraph (1) of the Minister of Marine Affairs and Fisheries Regulation No. 58 of 2020 concerning Capture Fisheries Business

<sup>27</sup> Article 109 paragraph (2) of the Minister of Marine Affairs and Fisheries Regulation No. 58 of 2020 concerning Capture Fisheries Business

<sup>28</sup> Article 109 paragraph (2) of the Minister of Marine Affairs and Fisheries Regulation No. 58 of 2020 concerning Capture Fisheries Business

<sup>29</sup> Article 112 paragraph (1) of the Minister of Marine Affairs and Fisheries Regulation No. 58 of 2020 concerning Capture Fisheries Business

<sup>30</sup> Article 112 paragraph (2) of the Minister of Marine Affairs and Fisheries Regulation No. 58 of 2020 concerning Capture Fisheries Business

<sup>31</sup> Article 113 of the Minister of Marine Affairs and Fisheries Regulation No. 58 of 2020 concerning Capture Fisheries Business

<sup>32</sup> Article 111 paragraph (1) of the Minister of Marine Affairs and Fisheries Regulation No. 58 of 2020 concerning Capture Fisheries Business

<sup>33</sup> Article 111 paragraph (2) of the Minister of Marine Affairs and Fisheries Regulation No. 58 of 2020 concerning Capture Fisheries Business

<sup>34</sup> Article 116 paragraph (1) of the Minister of Marine Affairs and Fisheries Regulation No. 58 of 2020 concerning Capture Fisheries Business

<sup>35</sup> Article 111 paragraph (2) of the Minister of Marine Affairs and Fisheries Regulation No. 58 of 2020 concerning Capture Fisheries Business

<sup>36</sup> Article 111 paragraph (3), (4), (5), (6) of the Minister of Marine Affairs and Fisheries Regulation No. 58 of 2020 concerning Capture Fisheries Business

<sup>37</sup> <https://faolex.fao.org/docs/pdf/mul165290.pdf>

<sup>38</sup> <https://faolex.fao.org/docs/pdf/mul221502.pdf>

to fish for tuna and tuna-like species managed by the IOTC on the high seas to promptly release unharmed, to the extent practicable, of oceanic whitetip sharks when brought alongside for taking onboard the vessel. However, CPCs should encourage their fishers to release this species if recognised on the line before bringing them onboard the vessels.”<sup>39</sup>

**Resolution on shark finning at sea:** Under IOTC Resolution 17/05: “Paragraph 3: a) Sharks landed fresh: CPCs shall prohibit the removal of shark fins on board vessels. CPCs shall prohibit the landing, retention on-board, transshipment and carrying of shark fins which are not naturally attached to the shark carcass until the first point of landing... b) Sharks landed frozen: CPCs that do not apply sub-paragraph 3 a) for all sharks shall require their vessels to not have on board fins that total more than 5% of the weight of sharks on board, up to the first point of landing. CPCs that currently do not require fins and carcasses to be offloaded together at the point of first landing shall take the necessary measures to ensure compliance with the 5 % ratio through certification, monitoring by an observer, or other appropriate measures.

Paragraph 5: Without prejudice to paragraph 3, in order to facilitate on-board storage, shark fins may be partially sliced through and folded against the shark carcass, but shall not be removed from the carcass until the first point of landing.”<sup>40</sup>

#### **CCSBT Resolutions:**

**Resolution to Align CCSBT’s Ecologically Related Species measures with those of other tuna RFMOs:** binds members of the CCSBT with the measures of other relevant RFMOs including the IOTC, WCPFC and ICCAT. This includes IOTC Resolutions 12/09, 13/06, 17/05 and 23/06.<sup>41</sup>

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<sup>39</sup> [https://iotc.org/sites/default/files/documents/compliance/cmm/iotc\\_cmm\\_13-06\\_en.pdf](https://iotc.org/sites/default/files/documents/compliance/cmm/iotc_cmm_13-06_en.pdf)

<sup>40</sup> [https://www.ccsbt.org/sites/default/files/userfiles/file/other\\_rfmo\\_measures/iotc/Resolution%2017\\_05.pdf](https://www.ccsbt.org/sites/default/files/userfiles/file/other_rfmo_measures/iotc/Resolution%2017_05.pdf)

<sup>41</sup> CCSBT (2023) Bycatch Mitigation: Binding Measures, <https://www.ccsbt.org/en/content/bycatch-mitigation>