Unique Vessel Identifiers: Application to vessels less than 24 metres, 100GT or 100GRT

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1. Introduction

1. Rapid and accurate identification and verification of a vessel's identity are paramount for successful fisheries monitoring, control and surveillance (MCS) and is critical in the fight against illegal, unreported and unregulated fishing activities. Unique vessel identifiers (UVIs) are assigned to a vessel for the life of the vessel irrespective of changes to ownership, flag or name, thereby enabling the vessel's activities to be traced and verified through time. Given the global nature of the tuna fleet, UVIs play an important role in the management of fishing activities, including determining those vessels that are engaged in IUU activities.

2. UVIs in the Global Context

2. There are two key global initiatives that recognise the need to improve transparency and traceability of the global fisheries sector through the issuing of UVIs: the *Global Record of Fishing Vessels, Refrigerated Transport Vessels and Supply Vessels* (the Global Record) and the Consolidated List of Authorised Vessels (CLAV).

3. The Global Record is a voluntary global initiative of the Food and Agriculture Organization of the United Nations (FAO). It seeks to provide a uniform approach to vessel identification irrespective of where the vessel is operating. It plans to eventually include all fishing vessels greater than or equal to 10GT, 10GRT or 12 meters length overall. The three-phased approach based on vessel size has commenced on vessels greater than 24 meters. This first phase includes working with the International Maritime Organisation (IMO) Ship Identification Number Scheme or Lloyds Number administrator, IHS Fairplay, to issue UVIs (in this case IMO numbers) for vessels at least 24 meters, 100GT or 100GRT. At this stage, the Global Record has not developed a clear plan for vessels less than 24 meters, 100GT or 100GRT; that is phase two and three of the program.

4. During the Kobe Process[1], members of tuna regional fisheries management organisations (RFMOs) agreed to coordinate and cooperate to establish a harmonised list of authorised tuna fishing vessels (positive list) whose details are as comprehensive as possible and include the use of a permanent UVI for each tuna vessel and resulting in a tuna UVI (TUVI). The result is the Consolidated List of Authorised Vessels, or CLAV. Not only does that CLAV provide a single consolidated list of tuna fishing vessels, it also enables the identification of duplicate records and the issuing of UVIs to vessels ineligible to obtain an IMO number.

[1] The Kobe Process, so called as the first meeting was held in Kobe, Japan, is a joint meeting of Tuna RFMOs that aims to harmonise the work of the tuna RFMOs. Information about the Kobe Process can be found at: www.tuna-tuna.org

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2.1. Tuna Regional Fisheries Management Organisations

5. Following on from the deliberations of the Kobe Process and utilising the decision of the 28th Regular Session of the IMO Assembly[2], all tuna RFMOs have implemented a mandatory requirement for all eligible vessels to obtain and report as a part of its record of authorised fishing vessels (or equivalent) its UVI, issued as an IMO number (Table 1). Consistent with the IMO Assembly decision, the RFMO decisions come into effect from 1 January 2016. But despite the decisions from the Kobe Process, only one RFMO, the Western and Central Pacific Fisheries Commission (WCPFC), recognised the need to issue UVI for authorised tuna fishing vessels that are ineligible to be issued an IMO number. To address this the Commission adopted Conservation and Management Measure (CMM) 2013-04 that highlights that further work is needed to determine how to accomplish UVIs for small vessels. In particular, paragraph 4 binds WCPFC members to *'continue to explore how to ensure that all vessels on the WCPFC Record of Fishing Vessels have UVIs'*.

Table 1: Binding measures adopted by RFMOs requiring IMO numbers on eligible vessels.

	CCSBT	IATTC	ICCAT	IOTC	WCPFC
IMO numbers	"Resolution on a CCSBT Record of Authorised Vessels to Fish for Southern Bluefin Tuna" (adopted 15 Oct 2015) "Resolution Establishing a Program for Transhipment y Large-scale Fishing Vessels" (adopted 16 Oct 2014)	CMM 2014-01, para 2(p)	Rec 2013-13, para 2	Res 2015-04, para 2(b)	CMM 2013-04 CMM 2013-10, para 6(s)
UVIs for other vessels	nil	nil	nil	nil	CMM 2013-04, para 4

6. The other four RFMOs need to recognise the need, then develop and implement a system for issuing UVIs for vessels that are currently ineligible to obtain an IMO number, including small-scale vessels authorised by the tuna RFMO.

3. Objective

7. This paper is prepared with the purpose of facilitating RFMO dialogue on the development of unique vessel identifiers for vessels that are unable to obtain an IMO number, including those less than 100 GT. This paper also highlights issues and considerations that individual RFMOs may wish to take into account in developing a global approach to the issuing of UVIs.

8. To assist in these deliberations, this paper focuses on describing the approach taken by the International Seafood Sustainability Foundation (ISSF) in issuing UVIs for registration on its ProActive Vessel Register (see Issuing UVIs: the ISSF Approach for the ProActive Vessel Register) and the issues that ISSF has encountered in undertaking

[2] The IMO Assembly adopted Resolution A.600(15) in 1987 as a measure to enhance maritime safety and pollution prevention while reducing maritime fraud by assigning a permanent number of each ship for identification purposes. The result was the IMO Ship Identification Number that is mandatory as of 1 January 2016. At its 28th Session, the Assembly amended Resolution A.600(15) through the adoption of A.1978(28) that now allows for the voluntary application of the IMO Ship Identification Number to fishing vessels of 100 GT or above (http://www.imo.org/en/OurWork/MSAS/Pages/IMO-identification-number-scheme.aspx).

this work (see Issues and Considerations for the Development of a UVI Issuing Approach for vessels ineligible for an IMO number by RFMOs). It is hoped that our learning will provide useful lessons and ideas for RFMO deliberations and help inform the adoption of a global system of issuing UVIs to vessels ineligible for IMO numbers to support efforts to combat IUU fishing and increase supply chain traceability.

9. In undertaking this work, it will be important for RFMOs to implement a uniform approach that takes into account the activities and lessons from other global initiatives, such as those highlighted above. Furthermore, RFMO discussions will need to take into account the specific issues regarding vessel authorisations in developing countries, including the registration of thousands of small-scale and artisanal fishing vessels. However, further details on these elements are outside the scope of this paper.

4. Issuing UVIs: the ISSF Approach for the ProActive Vessel Register

10. The IMO ship identification number is a unique seven digit number that is assigned to propelled, sea-going merchant ships of 100 GT and above upon keel laying with the exception of the following (http://www.imo.org/):

    - Ships without mechanical means of propulsion
    - Pleasure yachts
    - Ships engaged on special service (e.g. lightships, SAR vessels)
    - Hopper barges
    - Hydrofoils, air cushion vehicles
    - Floating docks and structures classified in a similar manner
    - Ships of war and troopships
    - Wooden ships

11. As part of its fight against IUU fishing, and given that large numbers of wooden vessels and vessels under 100 GT supply tuna worldwide, ISSF envisaged the possibility of issuing its own UVIs for vessels not eligible to apply for an IMO number.

12. To enable a vessel to obtain a globally distinct ISSF-issued UVI, vessel owners are requested to fill an application form (Appendix 1) where the vessels' details are recorded. Consistent with the IMO data requirements[3], an application for an ISSF UVI requires data for the following fields:

[3] Two data fields, RFMO identification and registration, are not required or collected by IHS Fairplay to issue an IMO number. However, IHS Fairplay does ask for information about the 'parallel flag' (e.g., charterer) where this is applicable (http://www.fao.org/fishery/topic/18021/en).

- Flag State
- Port of Registry
- Name of Fishing Vessel
- National Registration Number
- Previous Vessel Names (if any)
- Previous Flag or Flags (if any)
- International Radio Call Sign
- Ship Builder name
- Nationality of Shipbuilder
- Ship builder city, country
- Year Built
- Type of Vessel (purse seiner, longliner, pole and line, etc.)
- Length (LOA, meters)
- Moulded Depth (m)
- Beam (m)
- GT (tons)
- Power of Main Engine (hp)
- Fish well volume (cubic meters)
- Fish carrying capacity (tons)
- Registered Owner
- Address of Owner
- Commercial Operator
- RFMO where vessel is registered (if any)
- RFMO Vessel ID (if any)

13. As part of the guidelines to complete the application form, users are advised to not leave any empty fields, and instead use either "none" or "unknown" to clarify whether the information for a specific field does not exist or if it is otherwise unavailable or unknown.

14. All application forms submitted must be accompanied by supporting documentation that proves the existence of the vessel and the validity of the information provided in the application form. A scanned copy of the vessel's fishing license is accepted for this purpose.

15. For exceptional circumstances, for example ISSF's experience in Indonesia, where no documentation exists, ISSF relies on third-party verification of the vessel's data. In the case of Indonesia, the collection of this data has formed an integral part of a pilot program involving the International Pole and Line Foundation, Asosiasi Perikanan Pole & Line dan Handline Indonesia (AP2HI) and a local organisation Yayasan Masyarakat dan Perikanan Indonesia (MDPI) with the support of the Gordon and Betty Moore Foundation. In this pilot program, field agents have been employed to verify and collect vessel attribute data from ports in Indonesia.

16. After receipt of an application form by ISSF, there are a series of steps in the protocol for issuing ISSF-UVIs:

    a. Cross-check vessels in the application form with those already in the internal ISSF-UVI database, to avoid duplications.
    b. Confirm that at least one supporting document for each vessel has been submitted (or in exceptional circumstances, third-party verified vessel attribute data).
    c. Cross-check data in the application form with data in the supporting documents and other sources of information available (National Fisheries Agency registries, CLAV, RFMO vessel records, etc.)
    d. Confirm that applicant vessels are not eligible for an IMO number. If they are, notify the user and provide the necessary guidelines to apply for an IMO ship identification number.
    e. Assign unique vessel identifiers.
    The format adopted by ISSF consists of the prefix *i7* followed by 6 digits in sequential order. Following this format, the first ISSF-UVI assigned was *i7000001*, the second was *i7000002*, etc. However, if any of the vessels in the application form are already registered in a tuna RFMO and therefore listed on the CLAV, ISSF uses the CLAV record details and does not issue a new UVI. For example, if a vessel's TUVI was *TUVI#0099999*, the ISSF-UVI number assigned would be *i7099999*. This way, the ISSF-UVI and the CLAV-TUVI would be equivalent and the

vessel would avoid having several different UVIs which would be counterproductive.[4]

f. The new ISSF-UVIs assigned are included in the internal ISSF-UVI global database, where all information from the application forms is registered.
g. The user is notified of the ISSF-UVI assigned to each vessel by sending a registration sheet (**Appendix 2**).

[4] The approach used by ISSF was adopted prior to the recent reinvigoration of the CLAV including the subsequent revision period. ISSF recognises that in the future it will be important to determine the best way to incorporate existing TUVIs and ISSF-UVIs and whether there is a need in issuing ISSF-UVIs. ISSF will also need to consider the implications of TUVIs and ISSF-UVIs in relation to the PVR application following the launch of the Global Record.

5. Issues and Considerations for the Development of a UVI Issuing Approach for vessels ineligible for an IMO number by RFMOs

5.1. Accounting for the Global Context

17. UVIs can only prove useful if they are indeed unique. At a global scale, having different entities (RFMOs, national governments) issuing different UVIs for the same vessels would be confusing and counterproductive. Ideally, all vessels would obtain an IMO number; if the vessels are unable to obtain an IMO number then the next best option would be to obtain a TUVI through the CLAV. In instances where a vessel is not able to obtain either an IMO or a TUVI, then the ISSF's UVI is available to fill this gap.

18. Currently, IMO numbers are available for large-scale vessels that are greater than 100 GT. A TUVI is assigned when a vessel is included in the CLAV, however this option is only for vessels that are required to be authorized by a tuna RFMO in accordance with the specific rules of each RFMO. Small scale vessels or vessels not required to be included in the RFMOs list of authorised vessels are therefore unlikely to be eligible for either an IMO number or a TUVI as they will not be included on the RFMOs list; this is where UVI issued by ISSF are used.

19. If tuna RFMOs were to develop a system to issue UVIs for vessels not eligible for IMO numbers, it is advisable that this be a collaborative effort among RFMOs and national governments rather than parallel systems developed independently by different actors. The CLAV has proven to be a successful example of collaborative work among RFMOs. A similar database for small-scale vessels would be ideal, while another option would be including small-scale vessels directly in the CLAV.

20. It is important to recall that the vessels in the CLAV are taken directly from each of the tuna RFMO's Record of Authorised Vessel Lists (or equivalent). As alluded to above, each of the RFMOs have adopted and implemented their own specific rules pertaining to what class of vessel is required to be listed on its Record of Authorised Vessels[5] (Table 2). As such, reliance on the CLAV would benefit from the development of consistent rules regarding the size of vessels included on the record and the information collected on each of the vessels through their respective measures creating their Record of Authorised Vessels.

Table 2: A comparison of the primary measure creating the authorised vessel list for the four t-RFMO's.

IATTC	General application: **All vessels** authorised by a **contracting party or cooperating non-contracting party** who are authorised to fish for tuna and tuna like species (as identified in Annex I of UNCLOS) in the IATTC Area of Competence (Eastern Pacific Ocean). Restrictions: The authorised vessel list **applies to all vessels authorised to fish in both EEZs and high seas**. That is, there are no vessel size or spatial restrictions. Other Measures: Other IATTC measures create specific lists of vessels, e.g. a list of longline vessels greater than 24 metres. However the creation of these specific lists does not alter the requirements in the authorised vessel list measure itself. **CMM 12-07** outlines the requirements for the listing of all authorised carrier vessels.

[5] For a comprehensive review of the different requirements of the tuna RFMO Record of Authorised Vessel Lists measures please refer to ISSF Technical Report 2015-09

ICCAT	General application: All vessels **20m LOA or greater** authorised to fish for tuna and tuna like species (as defined in Annex I of UNCLOS) in the ICCAT Area of Competence (HS and EEZ). Restrictions: The authorised vessel list **does not apply to vessels less than 20 meters.** That is, there are vessel size restrictions – only applicable to vessels 20m LOA or greater. **Flagged to a member or cooperating non-member** – there is no explicit reference to a requirement to be flagged to a contracting and/or cooperating non-contracting party, however this is implied. Other Measures: The general application applies *mutatis mutandis*, except for vessel sizes for: **Rec 2014-04** on **Eastern Atlantic and Mediterranean Bluefin** tuna requires that the Commission maintain a record of all catching and non-catching vessels (irrespective of size) authorised to fish actively or operate respectively for bluefin tuna in the eastern Atlantic and Mediterranean Sea. **Rec 2013-04** on **Mediterranean Swordfish** requires that a record of all fishing vessels (irrespective of size) authorized to catch swordfish be maintained.
IOTC	General application: All vessels **24 meters and greater** irrespective of the area of fishing activity **and** vessels **less than 24 meters if fishing outside their own flag State waters**, flagged to a contracting party or cooperating non-contracting party, authorised to fish for tuna and tuna-like species (as defined by Annex I of UNCLOS) in the IOTC Area of Competence (HS and EEZ). Restrictions: The authorised vessel list **does not apply to vessels less than 24 meters operating inside their flag EEZ**. That is, there are restrictions based on vessel size and spatially related to the area of operation – vessels less than 24 meters operating inside their own flags EEZ are not required to be included on the authorised vessel list, however some states include these vessels anyway. Other Measures: **CMM 14-05** on a **record of foreign flagged vessels and access agreements** requires the maintenance of a list of all foreign flagged vessels authorised by coastal States or those permitted under access arrangements. **CMM 14-06** on **transhipment by large-scale longline vessels** requires the establishment and maintenance of list of authorised carrier vessels authorised to receive tuna, tuna-like species and sharks in the IOTC Convention Area.
WCPFC	General application: **All vessels** flagged to a contracting party or cooperating non-contracting party and authorised to fish for WCPFC species (as per Annex I UNCLOS and other associated species as determined by the Commission) in the WCPFC Area of Competence **in the high seas or in another coastal States EEZ**. Restrictions: The WCPFC record of vessels **only requires that vessels authorised to fish outside of their flag EEZ be included on the record**. That is, an EEZ spatial restriction applies – vessels fishing for highly migratory species (tuna and tuna-like species) solely within their own flags EEZ do not have to be listed on the WCPFC AFV. However there is **a requirement for the flag State to retain a record of all their flag vessels authorised to fish for highly migratory species within the Convention Area** (Part A, paragraph 1(a)). Other Measures: **CMM 12-05** Charter notification Scheme requires that States entering into charter agreements register all vessels to be identified as chartered.

5.2. Vessel information requested

21. Information collected to enable a UVI (or IMO number) to be issued are required to verify the vessel's identity and in turn support the ability of monitoring, control and surveillance assets to confirm the legitimacy of the vessels activities.

22. ISSF collects the same vessel information as is required by IHS Fairplay to issue an IMO number. However, through collaborative partnerships to register small scale handline and pole and line vessels in Indonesia, it was brought to ISSF's attention that some of the fields requested in the application form, although commonly requested from large-scale vessels, may not exist or may not be reasonably collected for small-scale vessels. ISSF has maintained these fields in the application form for cases when they are applicable, but highlights that the data fields most problematic to date have been the:

    - *Ship builder's name*, *Nationality of shipbuilder* and *Ship builder's city, country*: small-scale vessels are often built by owners themselves, rather than an official registered ship builder.
    - *Moulded depth (m)*, *Beam (m)* and *Fish well volume (cubic meters)*: these data fields are not readily available for small scale vessels and ISSF has been informed that even if there are estimates they may or may not be accurate.
    - *Commercial Operator*: as for the ship builder fields.

23. In addition, ISSF has found that there may also be other fields that have specific issues or may need special attention for applicant vessels from particular flag States. For example, in the case of Indonesia (the flag State from which the majority of ISSF-UVI applications have been received so far), the International Radio Call Sign (IRCS) and National Registration number fields have been problematic due to the domestic legislative and policy framework. In Indonesia, vessels under 60 GT are not required to have radio equipment, which results in many records not including that information in ISSF-UVI application forms. A different issue arises when recording Indonesian Registration Numbers; different levels of the Indonesian Government are responsible for the registration of different classes of vessels and a vessel can be registered in multiple Indonesian provinces. Moreover, applicants do not always report the same registration number when applying for ISSF-UVIs, which interferes with cross-checking for duplicated vessels in the database.

5.3. Verifying vessel information and updating a vessel's information

24. Details of some vessels are not easily verified, for example the year when the vessel was built or its gross tonnage and particularly if no fishing licenses or any other official documents exist. Like vessel registration databases maintained by national governments, ISSF's UVI database relies on vessel owners to report truthful information, as well as any changes the vessel may undertake over time (i.e., changes in vessel name, vessel flag, etc.). Verification of the ISSF PVR database is subject to periodic audit; the PVR audit team only undergoes independent in-port audits on a fraction of the vessels registered in the PVR. Although all PVR listed vessels are subject to third party audits, not all vessels applying for ISSF-UVIs are registered on the PVR.

25. Consistent with the United Nations Fish Stocks Agreement, flag States are responsible for vessels flying their flag on the high seas, and under the 1982 Convention coastal States should implement compatible measures for waters under their national jurisdiction. As such, ideally, a flag State would undertake periodic verification of its flagged vessels and provide this updated information to the relevant RFMO. In turn the RFMO Secretariat would provide this updated database to the CLAV thereby ensuring the validity of the information held in that global database. In this manner, each flag State would be responsible for providing up-to-date vessel data. Even in this scenario some complications may appear if the CPC's national fisheries agency does

not have direct control over vessels licensing (e.g., because they are licensed by a province or municipality level government).

5.4. Exceptions

26. It may be necessary to establish a cut-off point for issuing UVIs. Again using ISSFs experience in Indonesia, vessels under 5 GT are rarely registered or expected to have a fishing license in order to develop their activities by authorities (e.g., national, provincial or municipal governments). These vessels rarely fish on the high seas or more than one exclusive economic zone and so would not likely be required to be listed on the RFMOs record of authorised vessels. Furthermore, their fishing is most likely to be artisanal or small scale commercial, supporting household or community food security. As such they have limited fishing capacity and very little ability to monitor, and in some instances control, their fishing activities would not be crucial at a global scale.

6. Conclusions and Recommendations

27. IUU fishing continues to have major impacts on fisheries resources including tuna. To counter this requires improvement to supply chain traceability from the vessel to the consumer. At the catching end, UVIs issued to all vessels enable tuna to be traced to a specific vessel and its crew, to the ocean/region in which it was caught and including its transhipment to another vessel. It is the first critical step in both combatting IUU fishing and providing surety to consumers regarding the legal legitimacy of the product they are purchasing.

28. This report highlights that each RFMO has different rules governing the requirements of what size vessels and the data being collected by the RFMOs through its Record of Authorised Fishing vessels (or equivalent). This has direct implications for the CLAV and therefore has implications for ISSF's issuing of UVIs. The report recognises the legitimate and critical role of flag States in developing and maintaining vessel information and that of RFMOs in maintaining these records in accordance with the specific rules. But the report also acknowledges that there can be other programs, such as ISSF PVR program, that support issuing of UVIs to these ineligible vessels.

29. The report also highlights the approach being taken by ISSF in issuing UVIs to vessels that are currently ineligible to obtain an IMO number and the issues that have been encountered to date in undertaking this endeavour. To progress the development of UVIs for smaller vessels, ISSF recommends that RFMOs collectively consider the following issues and recommendations:

    a. Development of a global system of UVIs for small-scale vessels that is implemented through collaborative work among all tuna RFMOs such that it is truly a unique global vessel identification number. This would translate into a more effective traceability system than separate systems designed by each RFMO or national governments. An alternative could consist of appending small-scale vessel records to the already existing CLAV.

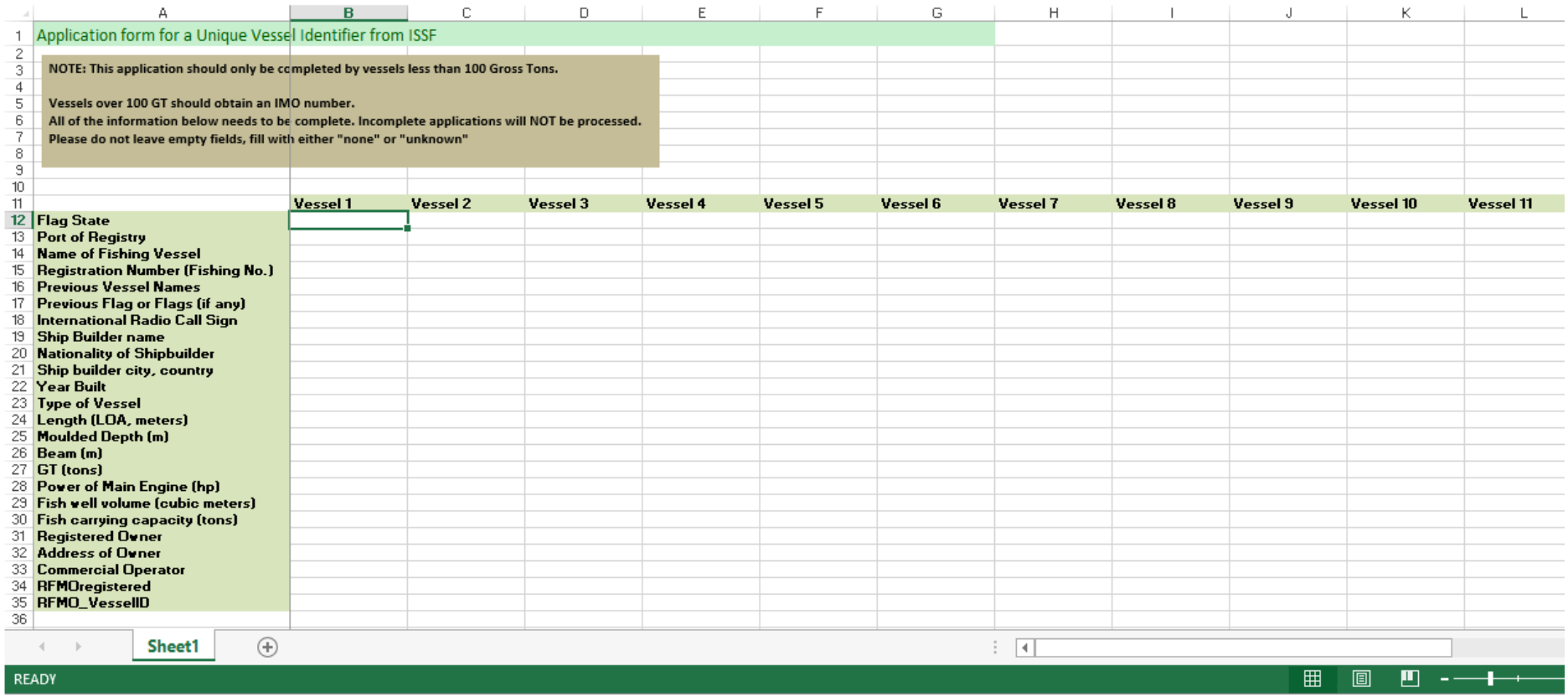
    b. The following should be considered minimum requirements for creating a system of UVIs for small-scale vessels:

        - defining minimum mandatory data fields that can be reasonably requested from small-scale vessels. As highlighted through ISSF collaborative work in Indonesia, there may be a need to recognize and make allowance for non-mandatory fields: e.g., (i) ship builder information fields, (ii) vessel dimension fields other than length, gross tonnage and fish carrying capacity (moulded depth, beam, fish well volume), and (iii) commercial operator.

- defining which entities are responsible for verifying vessels information and which are responsible for reporting changes over time to that information such as a change of flag, change of name, change of owner, etc.
- define limits of what constitutes a small-scale vessel that would be eligible and required to apply for a small-scale UVI (i.e., vessels over 5 GT).

c. Recognition of the ISSF-UVIs as a legitimate UVI, in the same way as an IMO number is, such that those vessels that have already been issued an ISSF-UVI can simply be added to the RFMOs record of vessels.

Appendix 1 – ISSF-UVI Application Form



Application form for a Unique Vessel Identifier from ISSF

NOTE: This application should only be completed by vessels less than 100 Gross Tons.

Vessels over 100 GT should obtain an IMO number.
All of the information below needs to be complete. Incomplete applications will NOT be processed.
Please do not leave empty fields, fill with either "none" or "unknown"

	Vessel 1	Vessel 2	Vessel 3	Vessel 4	Vessel 5	Vessel 6	Vessel 7	Vessel 8	Vessel 9	Vessel 10	Vessel 11
Flag State											
Port of Registry											
Name of Fishing Vessel											
Registration Number (Fishing No.)											
Previous Vessel Names											
Previous Flag or Flags (if any)											
International Radio Call Sign											
Ship Builder name											
Nationality of Shipbuilder											
Ship builder city, country											
Year Built											
Type of Vessel											
Length (LOA, meters)											
Moulded Depth (m)											
Beam (m)											
GT (tons)											
Power of Main Engine (hp)											
Fish well volume (cubic meters)											
Fish carrying capacity (tons)											
Registered Owner											
Address of Owner											
Commercial Operator											
RFMOregistered											
RFMO_VesselID											

Sheet1

READY

Appendix 2 – ISSF-UVI Registration Sheet

yyyy.mm.dd

Dear Mr. / Ms. _____,

I am pleased to inform you that the following vessels were assigned an UVI-ISSF number:

UVI-ISSF	FlagState	PortOfRegistry	VesselName	RegistrationNumber(FishingNo.)
i7000001				
i7000002				
i7000003				
i7000004				
i7000005				
i7000006				
i7000007				

Thank you for your application.

Best regards,