**Transhipment**

  10th February 2020

Introduction

Transhipment is a relatively straightforward activity, comprising the exchange of goods from one vessel to another that is being used solely for transporting cargo.[1](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-1-66) Transhipment has become an important component of in the fishing industry particularly.[2](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-2-66). Refrigerated transhipment vessels act as hubs, allowing smaller and less well-equipped vessels to fish at greater distances from ports and landing areas. Transhipment vessels may also act as bunkering or resupply hubs.

A group of boats in a harbor

Description automatically generated[Transhipment vessel by Joe Goa Uk](https://www.flickr.com/photos/joegoauk73/21611341999/), Attribution-ShareAlike 2.0 Generic (CC BY-SA 2.0)

Characteristics

Not all transhipment activity is illegal, and transhipment practices are often essential for fishing in remote areas. However, IUU fishers can also engage in transhipment in order to fish in areas they may usually find difficult to reach, conserve fuel, and to stay out at sea longer to avoid detection from ports and landing monitoring.[3](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-3-66) By transferring fish into transhipment vessels, IUU fishers can launder illegal catches with legal catches by obscuring the source of the catch.[4](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-4-66)

The UN Food and Agriculture Organization identifies five types of transhipment: catching vessel to refrigerated cargo vessel; catching vessel to containers; catching vessel to small transport vessel; catching vessel to other fishing vessel; and, catching vessel to floating storage vessel.[5](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-5-66) Of these, the first – catching vessel to refrigerated cargo vessel – is characterised by the highest risk of illegal activity because it can go unnoticed on the high seas.[6](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-6-66)

Examples of transhipment include squid fishing in the West Indian Ocean, where unregulated Chinese vessels have used transhipment to facilitated their IUU fishing.[7](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-7-66) A second example provided by Miller et al. is the loitering of transhipment vessels just beyond Argentina’s EEZ, suggesting IUU fishers are illegally entering restricted waters to fish and transhipping to avoid landing the catches illegally.[8](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-8-66) There have also been reported cases of transhipment between large industrial vessels and small boats from developing countries, such as Ghana, where food is traded for illegal by-catches from the industrial vessels which are then locally marketed.[9](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-9-66)

Transhipment is often carried out in areas of unclear jurisdiction, where enforcement agencies find it more difficult to monitor and act upon suspicious activities.[10](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-10-66) Many transhipment vessels also operate under so called flags of convenience,[11](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-11-66) or ‘flag hop’.[12](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-12-66)This has led to a growing concern about the sustainability of transhipment.[13](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-13-66) As an indication of its importance, transhipment has been recognised by the FAO’s International Plan of Action as a key target for intervention to reduce IUU fishing.[14](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-14-66)

Scope

The scope of illicit transhipment is largely unknown, though there have been some attempts to measure it.[15](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-15-66) and Miller et al.[16](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-16-66) These studies analysed vessel tracking data, such as that from Automatic Identification System technologies, to trace suspicious vessel movements over a five-year period.

While imperfect, because ships can turn off AIS and broadcast incorrect information,[17](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-17-66) Miller et al. discovered 46,570 instances of transhipment vessel loitering (where they would have had time enough to receive a transhipment), and 10,233 instances of fishing vessels loitering near transhipment vessels.[18](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-18-66)

Kroodsma et al. identified 71,468 loitering incidents, with 5783 where fishing vessels were loitering nearby. While much of this activity was likely not illegal, Miller et al. observe that 47 per cent of these incidents occurred on high seas, and 42 per cent involved vessels flying flags of convenience – both indicators often associated with facilitating IUU fishing and other crimes.[19](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-19-66) Areas with high levels of fishery management such as Europe and North America see little transhipment behaviour.[20](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-20-66)

Other data is difficult to access and analyse. Many areas do not survey transhipment activities, and even those that do are not transparent as data is viewed as sensitive business information.[21](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-21-66)

Impact

Transhipment can facilitate IUU fishing, and is therefore is linked to the negative impacts of these practices. It allows IUU fishers to stay out at sea for longer and launder their fish in a more efficient manner.[22](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-22-66). It can also be associated with other fisheries crime such as forced labour because IUU fishing vessels do not need to go to port as often, minimising the risk of discovery and keeping crews at sea potentially indefinitely.[23](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-23-66) Transhipment vessels may also use forced labour themselves.[24](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-24-66)

Linkages & Synergies

Transhipment has been linked primarily with IUU fishing and other fisheries crimes such as forced labour. It has also been linked to other crimes such as drug and weapons trafficking.[25](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-25-66)

Responses

*International*

Transhipment is increasingly recognised as a significant issue that requires a response.[26](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-26-66) The UN Fish Stocks Agreement requested that ‘to the maximum extent possible transhipment occur in ports’,[27](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-27-66) and many Regional Fisheries Management Organisations (RFMOs) also prioritise the issue. The FAO have recommended minimum standards or guidelines on specific measures to effectively monitor and control transhipping.[28](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-28-66)

Despite these measures, responses to illegal transhipment have been ad hoc because it typically occurs far from port in areas of little surveillance.[29](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-29-66) Cooperation between stakeholders is also often lacking. [30](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-30-66) This partly results from the fact that policies towards transhipment vary across different states and regions which creates barriers to enforcement and cooperation.[32](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-32-66) However, even where regulations exist, enforcement is difficult and there are questions as to the success of transhipment bans when they do occur. Bans are not always seen as the best course of action, given that some licit fisheries depend on transhipment activities for logistical reasons. Some RFMOs therefore offer ‘impracticability’ exemptions, allowing transhipment to avoid economic hardship.[33](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-33-66)

This has led to a focus on monitoring transhipments in many RFMOs. The FAO Global Study on transhipments indicates that of seven out of ten RFMOs evaluated, four already require reefers to either be equipped with Vessel Monitoring Systems (VMS) or have observers on board.[34](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-34-66) They also argue that there are sufficient RFMO regulations in place to control ‘legal’ transhipments.

These ranged from:

* ‘*a complete ban such as those imposed by SEAFO, Chile and the EU*
* *a complete ban with derogations for specific sectors of the fishing fleet and target species adopted by New Zealand, WCPFC and others.*
* *transhipments at sea are permitted but with conditions attached or certain types of transhipment are banned as adopted by for example NAFO and Ghana.’*

The Forum Fisheries Agency and Convention for the Conservation of Antarctic Marine Living Resources also monitor transhipment activities.[35](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-35-66).

Observers can play a significant role in preventing prevent illegal transhipment activities, as can the independent verification of catch and transhipment.[36](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-36-66) However, the FAO suggests that there can be inconsistencies in observer duties and responsibilities. Most RFMO regulations ‘require only a minimum of five percent observer coverage’.[37](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-37-66)

*National*

The monitoring and surveillance of transhipment activities presents a significant challenge for many states, and even those with strong regulations in place may struggle to enforce these. There is evidence to suggest that issues are similar in even in cases where transhipment has been banned outright.[38](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-38-66) Indonesia for example instituted a ban on transhipment in response to IUU fishing in its waters.[39](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-39-66) Enforcing the ban has proved to be challenging however. In part this is due to the difficulties in detecting and monitoring transhipment activities at-sea, [40](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-40-66) but also because of opposition from domestic fishing stakeholders.

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*Regional*

Some regions, such as West Africa, are perceived to have particularly weak regulation on transhipment.[31](https://www.safeseas.net/evidence/2020/02/10/transshipment/#easy-footnote-bottom-31-66)[Daniels et al. 2016](https://www.odi.org/sites/odi.org.uk/files/resource-documents/10665.pdf)[;](https://fish-i-network.org/wp-content/uploads/2017/06/Squid_capture_in_the_NWIO_FINAL_LR.pdf) [Stop Illegal Fishing et al. 2017](https://fish-i-network.org/wp-content/uploads/2017/06/Squid_capture_in_the_NWIO_FINAL_LR.pdf); [Stop illegal fishing et al. 2021;](https://stopillegalfishing.com/publications/transhipment-and-the-fcwc-region-case-studies/)[Stop Illegal Fishing et al. 2022](https://stopillegalfishing.com/news-articles/new-report-transhipment-issues-and-responses-in-the-fcwc-region/)

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