

16 August 2023

Vessel Activity Notification

Allegations of potential illegal, unreported and unregulated (IUU) fishing and serious human rights abuses on vessels belonging to 'Qingdao YKS Ocean Fishery'

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 through conducting interviews with former crew from fishing vessels and through the use of softwares such as ExactEarth, Global Fishing Watch and Starboard, that allow for the observation of vessels equipped with an Automatic Identification System (AIS).

Introduction

EJF has been made aware of serious allegations of IUU fishing offences, human and labour rights abuses¹ across a number of vessels under the ownership of 'Qingdao YKS Ocean Fishery' (Qingdao YKS) operating predominantly in the Indian Ocean (FAO 51). It is alleged by former crew members who have worked on the vessels detailed in this alert (LU QING YUAN YU 115, 116, and 117), that they have witnessed or engaged in potential destructive and IUU fishing offences including shark finning, fishing in prohibited zones and the capture of charismatic species such as dolphins and rays. They also allege to have witnessed or experienced human and labour rights abuses including physical and verbal abuse, wage deduction, and document retention. It should be noted that all of the vessels in this alert are currently licensed to operate in the Indian Ocean Tuna Commission (IOTC) Convention Area, and were also licensed to do so when the alleged offences occurred.

This Vessel Activity Notification, based on crew member testimony, photographic and filmed evidence, AIS data and open source intelligence, provides detailed information regarding the reported potential IUU fishing offences and human rights abuses experienced across a number of vessels in the Qingdao YKS fleet. The fleet also has potential supply chain links with major markets including the EU, Korea, and Japan.

¹ This briefing will group human rights abuses and labour abuses under the heading 'Potential human rights abuses'

Vessel identities²

Name	IMO	MMSI	Beneficial Owner	Gear Type ³	IOTC No.	Flag
LU QING YUAN YU 115	8546268	412336875	Qingdao YKS Ocean Fishery	Longlines	17232	China ★**
LU QING YUAN YU 116	8546270	412336876	Qingdao YKS Ocean Fishery	Longlines	17233	China ★**
LU QING YUAN YU 117	8546282	412336877	Qingdao YKS Ocean Fishery	Longlines	17234	China ★**

<u>Table 1 - Summary of the number of crew members interviewed on each vessel, and the cumulative dates on board</u>

Vessel name	Number of fishers interviewed	Dates on board	
LU QING YUAN YU 115	1	12/2020 - 10/2021	
LU QING YUAN YU 116	4	09/2019 - 01/2022	
LU QING YUAN YU 117	7	12/2020 - 01/2022	

Vessel activities

The below section provides an overview of the alleged IUU fishing and human rights offences for each vessel (**Table 2**). Where possible, testimony received from crew members has been corroborated through visual evidence provided (e.g. photos of the crew on board, passports, contracts, etc.) and/or through vessel tracking software.

² Information sourced from IHS-Seaweb, unless specified otherwise. Accessed 17.07.2023, https://www.maritime.ihs.com (subscription required).

³ Information obtained from the record of currently authorized vessels, available at: https://iotc.org/vessels/current

<u>Table 2 - Summary of alleged potential IUU fishing offences and human rights abuses on board Qingdao YKS Ocean Fishery vessels</u>

Vessel name	Potential IUU fishing offences	Potential human rights abuses
LU QING YUAN YU 115	● Shark finning	 Verbal abuse Document retention Wage deduction Deception Excessive working hours
LU QING YUAN YU 116	 Shark finning Potential fishing in prohibited areas Charismatic catches (Manta Ray) 	 Physical abuse Verbal abuse Document retention Wage deduction Deception Excessive working hours
LU QING YUAN YU 117	 Shark finning Charismatic catches (Dolphins, Giant manta rays) 	 Physical abuse Verbal abuse Document retention Wage deduction Deception Excessive working hours

As part of the interview process, EJF investigators ask fishers to identify animal species caught by their vessel, presenting interviewees with animal identification guides in order to ensure the accuracy of claims, as well as conducting visual analysis of images received.

Several of the identified species are listed as endangered and critically endangered on the International Union for Conservation of Nature's (IUCN's) Red List of Threatened Species⁴. Several species are also included in Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)⁵, and are therefore subject to controls on international trade, as well as being included in both Appendix I and II of the Convention on the Conservation of Migratory Species of Wild Animals (CMS). **Table 3** summarises the species that EJF believe to have been captured by the vessels mentioned in this briefing.

⁴ https://www.iucnredlist.org

⁵ Trade in the species listed in CITES Appendix II must be controlled in order to avoid utilisation incompatible with their survival: https://cites.org/eng/app/index.php

Table 3 - Shark species identified by crew members⁶

Species name	IUCN Red List Classification ⁷	CITES ⁸	IOTC prohibitions	CMS	Allegedly identified on vessel
Blacktip Shark (Carcharhinus limbatus)	Vulnerable				LU QING YUAN YU 115 LU QING YUAN YU 117
Oceanic Whitetip Shark (Carcharhinus Iongimanus)	Critically Endangered	Appendix II	Resolution 13/06 ⁹	Appendix I	LU QING YUAN YU 115 LU QING YUAN YU 116 LU QING YUAN YU 117
Shortfin mako shark (Isurus oxyrinchus)	Endangered			Appendix II	LU QING YUAN YU 115 LU QING YUAN YU 117
Silky Shark (Carcharhinus falciformis)	Vulnerable	Appendix II		Appendix II	LU QING YUAN YU 117
Blue Shark (<i>Prionace</i> glauca)	Near Threatened			Appendix II	LU QING YUAN YU 115 LU QING YUAN YU 116 LU QING YUAN YU 117
Great Hammerhead Shark (<i>Sphyrna</i> <i>mokarran</i>)	Critically Endangered	Appendix II		Appendix II	LU QING YUAN YU 116
Pelagic Thresher Shark (Alopias pelagicus)	Endangered	Appendix II	Resolution 12/09 ¹⁰	Appendix II	LU QING YUAN YU 116

LU QING YUAN YU 115

EJF spoke to one crew member who worked on board the LU QING YUAN YU 115 between December 2020 and October 2021. During the period that the crew member was on board, the vessel operated in the Indian Ocean, FAO area 51 (see **Appendix 1**), and travelled to port in Singapore (Singapore), and Port Louis (Mauritius). At the time of writing, the vessel last transmitted AIS on 10.08.2023, locating it in the Indian Ocean, at 31.8865 S, 78.5938 E.

Potential IUU fishing

Shark finning reportedly took place on board the LU QING YUAN YU 115, with the crew member

(https://iotc.org/cmm/resolution-1903-conservation-mobulid-rays-caught-association-fisheries-iotc-area-competence).

⁶ EJF notes that IOTC has also adopted a resolution on the conservation of mobulid rays caught in association with fisheries in the IOTC area of competence

⁷ https://www.iucnredlist.org

⁸ https://cites.org/sites/default/files/eng/app/2023/E-Appendices-2023-02-23.pdf

⁹ https://iotc.org/sites/default/files/documents/compliance/cmm/iotc cmm 13-06 en.pdf

 $[\]frac{10}{\text{https://www.iotc.org/cmm/resolution-1209-conservation-thresher-sharks-family-alopiidae-caught-association-fisheries-iotc}$

stating how sharks would eat the bait, and then they would be electrocuted and pulled up onto the ship, where the crew would remove the fins. Oceanic Whitetip Sharks, Blacktip Sharks, Shortfin Mako Sharks, and Blue Sharks were noted to have been caught (images shared by crew of sharks on board the vessel can be seen in **Appendix 2**).

Potential human rights abuses

The crew member reportedly did not have access to a copy of his contract, and was prohibited by the agency to even take a picture when signing it. Moreover, when the crew member boarded the vessel, he was forced to sign a new contract, which stated his salary was US\$ 100¹¹, as opposed to the US\$ 310 agreed in the original contract. Only around US\$ 73¹² ended up being sent to his allotted family member during the ten months on board, and only US\$ 489 was deposited to his savings account, as opposed to the US\$ 1,812 that was agreed in the contract.

The crew were also reportedly working 15 to 18 hour days, with around three to five hours allocated for sleeping. When five crew decided to protest these harsh working conditions, they were forced to sleep at the top of the vessel, without a roof, and pay US\$ 10 for their daily meals. The captain and senior crew were often verbally abusive, "the captain is always shouting, angry, nagging, and using bad words".

The crew member interviewed got into a physical altercation with a colleague, whereby he was hit with a hammer and a knife. The interviewee was cut by the knife, and the wound was sewn up by the bosun without any anaesthesia. He requested help from his agency through the captain, but the captain never responded to this request.

LU QING YUAN YU 116

EJF spoke to four crew members who worked on board the LU QING YUAN YU 116 between September 2019 and January 2022. During the period that the crew members were on board, the vessel operated primarily in the Indian Ocean, FAO area 51 (see **Appendix 3**). During this time the vessel travelled to port in Weihai (China), Manila (the Philippines), Singapore (Singapore), and Port Louis (Mauritius). At the time of writing, the vessel last transmitted AIS on 10.08.23, locating it in the Indian Ocean, at 31.7467 S, 76.8352 E.

Potential IUU fishing

According to crew testimony, shark finning occurred on board. The crew members detailed how Oceanic Whitetip Sharks, Hammerhead Sharks, Pelagic Thresher Sharks, and Blue Sharks would be caught, electrified, and then be brought on board to have their fins removed. The fins were eaten on board the vessel, and hidden in the freezer "because it was forbidden". An image depicting a crew member with a shark on board the vessel can be seen in **Appendix 4**. One Manta ray was caught, which was slaughtered - possibly in contradiction with IOTC Resolution 19/03 on the conservation of mobulid rays caught in association with fisheries in the IOTC area of competence.

One of the crew members suggests that the vessel also fished in prohibited areas, "we were there for three days, and the coast guard chased us". He noted that they had no permit to enter the area, and escaped the coast guard, suggesting that they would have been imprisoned if they had been caught.

¹¹ All \$ in this alert refers to USD.

¹² The conversion rates throughout this alert are correct as of 02.08.2023. Conversion rates may differ from those at the time of the transfer. We do not provide the original payments to protect the security of crew members.

Throughout the three days, crew were ordered to guard the vessel, and alert if anything was approaching, in which case they would leave the area immediately.

Having reviewed the vessel's AIS transmissions for the period that the crew were on board, there are no obvious instances where it enters the EEZ of a coastal state, potentially without due authorisation. This does not rule out the possibility of the illegal incursion mentioned by the crew member taking place, given the propensity of fishing vessels to switch off their AIS whilst conducting illegal fishing (known as 'going dark').¹³ The possibility of this can be seen in the vessel's tracks - passing through the Seychellois EEZ on three occasions whilst the crew member was on board, and on all three occasions seemingly switching off its AIS transmitter for the vast majority of the journey (**Appendix 5**).

Potential human rights abuses

Multiple crew members requested to return home from the vessel throughout their contract, but this was not permitted as the captain told them the vessel was not able to dock. It was reported that they had all their documents retained by the captain, with only the passport being returned when they were on their way home.

Payment was also heavily deducted. One of the crew member's family was expected to receive US\$ 100 each month, with the rest of the money (US\$ 200 a month) to be given at the end of the contract. The amount sent to the crew member's allotted family member was subject to deductions, with the family only receiving US\$ 1,087 for a year's work. None of the monthly US\$ 200 payments were ever received. The crew member states that the name of the agency and all the staff have been changed, and therefore there is no way of receiving the money. Another crew member interviewed paid for all his own documents, was charged double by the agency for transportation costs, and never received any allowance or bonus from the agency. His mother did not receive any money for five months.

The crew would only get between three and four hours to rest and sleep and they had to work even when they got sick or injured - "because the official said we are being paid". Evidence of injuries reportedly received on board the vessel can be seen in **Appendix 6**. It was also stated that the crew's drinking water was "rusty" for the first six months of their contract, while the senior crew always had access to mineral water.

The senior crew were reportedly often verbally abusive, particularly towards the beginning of the contract - "the bosun and captain were always shouting at us". The Chinese crew members faced physical abuse on board, "they won't hurt us [Filipinos] because we will hurt them too. That's why they are hurting their fellow Chinese; the Chinese are also old people". One crew member alleged the bosun was particularly harsh with his [the bosun's] nephew, "he punched and kicked his nephew, and the bosun threw away his belongings because he fell asleep due to tiredness. The bosun hurts his nephew four times in a week". The other crew members gave him clothes when he was left with nothing. Images depicting the physical injuries of a crew member can be seen in **Appendix 7**. EJF have also seen images of facial injuries, but for confidentiality reasons have not included these.

When the crew decided not to work to protest their conditions, the senior crew turned off the air conditioning and sent them to the top of the vessel. For the two days of protest, they were also not fed, "if you don't work, you can't eat, that's their policy".

¹³ See for example: Oceana. (2018). Avoiding detection: global case studies of possible AIS avoidance. Available at: https://usa.oceana.org/reports/avoiding-detection-global-case-studies-possible-ais-avoidance/

LU QING YUAN YU 117

EJF spoke to seven crew members who worked on board the LU QING YUAN YU 117 between December 2020 and January 2022. During the period that the crew members were on board, the vessel operated in the Indian Ocean, FAO area 51 (see **Appendix 8**), and travelled to port in Manila (the Philippines), Singapore (Singapore), and Port Louis (Mauritius). At the time of writing, the vessel last transmitted AIS on 10.08.23, locating it in the Indian Ocean, at 32.9353, 79.1081 E.

Potential IUU fishing

Suspected IUU fishing was reported by all seven of the crew that EJF spoke to. The testimonies describe the occurrence of shark finning, with the crew separating the body from the fins, and then placing the fins in a sack. The fins were transferred at sea to carriers. Blacktip Sharks, Oceanic Whitetip Sharks, Shortfin Mako Sharks, Silky Sharks, and Blue Sharks were among those caught. The body of the Blue Shark was kept after it was finned, and was kept in the freezer, but the rest of the species' bodies were thrown back into the sea.

Dolphins were also caught, and ordered to be brought on board by the bosun - "we struggled to get the dolphin onto the ship, but the bosun really wanted to lift it. The dolphin was crying, and we felt sorry." An image depicting the catch of a dolphin can be seen in **Appendix 9**. EJF notes that IOTC Resolution 13/04 on the conservation of cetaceans includes reporting obligations on interactions with cetaceans¹⁴. Among the manta rays reportedly taken were Giant Manta Rays, which are listed as endangered on the IUCN Red List¹⁵. The Chinese Wild Animal Conservation Law prohibits catching and killing False killer whales and 11 species of dolphin. Those found guilty of these crimes can be sentenced to more than five years in prison, according to the Chinese Criminal Code¹⁶.

Potential human rights abuses

The crew on board the LU QING YUAN YU 117 also reported having witnessed, and experienced a number of human rights abuses, including physical and verbal abuse, document retention, and wage deduction. The contracts would have been signed right before boarding the vessel, and the crew were not permitted to obtain a copy or even take a picture. All their documents were retained by the captain, including their passport, seaman's book, and birth certificate, among others. According to some testimonies, on board salaries (US\$ 50) and bonuses were unpaid throughout their time on the vessel, and the allocation to family members took between two and three months to arrive each time. Multiple crew members attested to other salary deductions, with several receiving US\$ 100 less a month than agreed in the contract. One crew member's family only received three months of salary for the year worked, and another only received US\$ 453 for the year working on the vessel.

All seven crew members also reported that verbal abuse occurred on board the LU QING YUAN YU 117. The captain and senior crew were said to be "shouting always". One crew member was stung by a Manta Ray, and the bosun and captain laughed. This same crew member alleged that "many times I told them that I wanted to go home because I had an accident a few times but the captain said to me, that even if I die here, it's still cold in the freezer and I won't rot." The water was "rusty" (an image of the water available on board can be seen in **Appendix 10**), in comparison to the mineral water obtained for the senior crew, and the food was often left out for a week and infested with

¹⁴ https://iotc.org/cmm/resolution-1304-conservation-cetaceans

¹⁵ IUCN Red List. (2019). Oceanic Manta Ray. Accessed: https://www.iucnredlist.org/species/198921/214397182

¹⁶ The National People's Congress of the People's Republic of China, 14.3.1997, '中华人民共和国刑法', accessed 19.7.2023, http://www.npc.gov.cn/zgrdw/npc/lfzt/rlys/2008-08/21/content_1882895.htm

cockroaches. When they first boarded the vessel, the crew got their drinking water from the leaking air conditioner.

Several crew members working on the vessel went on strike, to protest their working hours. Crew members stated that work days usually consisted of anywhere between 18 to 24 hours, and sometimes reached up to 48 without relief. When protesting, they were fed once a day, reportedly only a bowl of rice at 2am, and they had to stay at the top of the vessel for one month and one week (their alleged living conditions during this time can be seen in **Appendix 11**).

When they returned home, the crew were unable to buy food or take transport home, as they were not paid their onboard allowance and therefore had no access to money. A workers welfare association paid for their tickets home.

Supply chain links

Through our investigations, EJF believes that seafood from all vessels included in this briefing has potentially entered, and continues to enter, key seafood market states.

Vessel tracking softwares Starboard and Global Fishing Watch, indicate that all vessels listed in this alert potentially undertook at-sea trans-shipment with a refrigerated cargo vessel (commonly known as a 'reefer'), 'FUTAGAMI', between the time the interviewed crew were on board and present. This reefer vessel then returned to ports in China, Korea, and Japan – indicating that they may have offloaded catch deriving from the vessels into major market state supply chains. Details of these trans-shipments are in **Table 4**, and screenshots can be found in **Appendix 13**.

Furthermore, under EU health legislation, food of animal origin intended for export to the EU (including fisheries products) must originate from establishments that appear on the appropriate list administered by the Directorate-General for Health and Food Safety (DG SANTE). This includes fishing vessels with freezing capacities. DG SANTE's published list of authorised establishments can provide an indication of fishing vessels that may potentially be actively supplying fisheries products to the EU market¹⁷.

At the time of writing, two of the vessels in this alert (LU QING YUAN YU 115 and 117) appear on China's list of establishments that are authorised to supply fisheries products to the EU. As seen in **Table 5**.

¹⁷ The non-EU establishments database can be found here: https://webgate.ec.europa.eu/tracesnt/directory/publication/establishment/index#!/search?sort=country.translation

Table 4 - Record of trans-shipments between FUTAGAMI and LU QING YUAN YU 115, 116 and 117

Name	IMO	Beneficial Owner (Owner Nationality)	Flag	Trans-shipment dates	Eventual destination for the carrier
FUTAGAMI	9105293	Bao Fortune Shipmanagement Co (China)	Panama	LU QING YUAN YU 115: Aug 30, 2021 LU QING YUAN YU 116: Sep 15, 2021 LU QING YUAN YU 117: Sep 14, 2021	Ningde, China: Oct 14, 2021 - Oct 17, 2021 Weihai, China: Oct 21, 2021 - Nov 23, 2021 Busan, Korea: Nov 24, 2021 - Nov 25, 2021 Shimizu, Japan: Nov 30, 2021 - Dec 7, 2021

<u>Table 5 - Vessels included in this alert that are on the DG SANTE list of approved non-EU</u> establishments¹⁸

Vessel name	Approval Number	Region	Activities
LU QING YUAN YU 115 (QING DAO YKS OCEAN FISHERY COMPANY LIMITED)	3700/02F73	QINGDAO	ZV (FREEZER VESSEL)
LU QING YUAN YU 117 (QING DAO YKS OCEAN FISHERY COMPANY LIMITED)	3700/02F74	QINGDAO	ZV (FREEZER VESSEL)

Recommendations

EJF recommends that the IOTC, together with its relevant member countries:

- Confirm whether or not the vessels contained within this alert are currently authorised to operate in the IOTC convention area, and whether or not they were authorised to conduct fishing operations during the periods of testimony.
- Confirm whether or not the trans-shipments outlined in this alert were conducted in accordance with IOTC Resolution 22/02 on establishing a programme for transhipment by large-scale fishing vessels and the relevant resolutions it superseded.
- Request and review the VMS transmissions of LU QING YUAN YU 116 to ascertain whether or not the vessel fished within prohibited areas.
- If it is determined that any or all of the vessels operations were conducted in breach of relevant IOTC Conservation and Management Measures, then the IOTC should seek to include the vessels on its list of IUU fishing vessels.
- Engage with all members and relevant governments to encourage the accelerated ratification of international conventions including, but not limited to, Cape Town Agreement, International Labour Organization Work in Fishing Convention and the

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¹⁸ Ibid.

- Port State Measures Agreement (PSMA) to ensure all seafood in the supply chain is free of human rights abuses and illegal activities.
- Implement near real time electronic reporting to observe the catch of all commercial species caught by IOTC's Contracting Parties and Cooperating non-Contracting Parties (CPCs) for all fisheries. Other RFMOs, such as the Convention for the Conservation of Antarctic Marine Living Resources (CCAMLR) and the International Commission for the Conservation of Atlantic Tunas (ICCAT), have already adopted electronic monitoring reporting practices.
- Better support the electronic monitoring process and pilot projects, and ensure the presence of compliance experts in the EM working group.
- Galvanise its CPCs to resolve the issues preventing adoption of a high seas boarding and inspection scheme, in order to better detect IUU fishing and human rights abuses within its Convention Area.

EJF recommends that Chinese government:

- Investigate the alleged illegal practices and trans-shipments and, if confirmed, sanction the vessels' owners/captains for the violations.
- Improve transparency in fisheries management. The Global Fisheries Transparency Coalition outlines ten transparency principles in the Global Charter for Fisheries Transparency¹⁹ that are suitable for every country and can be immediately adopted. The priority for the Chinese government should be focusing on publishing organised and up-to-date lists of authorised vessels and sanction lists.
- Ensure the information on Chinese distant water fishing vessels uploaded to the FAO Global Record of Fishing Vessels, Refrigerated Transport Vessels and Supply Vessels by China is comprehensive and up to date.
- Fully ratify and implement the International Labour Organisation Work in Fishing Convention C188 to address issues around labour abuses.
- Review EJF's report *Murky Waters*²⁰ and implement the recommendations it sets out.

EJF recommends that the authorities of the EU, Japan, Mauritius, South Korea, and the Philippines:

- Investigate whether seafood caught by the vessels detailed in this alert, or any other vessels belonging to Qingdao YKS Ocean Fishery, is being landed or imported into their respective countries.
- If seafood from the above sources is indeed entering supply chains, scrutinise any landings or imports to ensure that they have not derived from IUU fishing or from a vessel on which the human rights of crew are being violated. This should be done in full cooperation with the flag state and relevant regional bodies.
- Enhance port inspections in order to better identify where seafood entering their ports derives from IUU fishing, and if crew entering their ports are being subjected to human rights abuses.

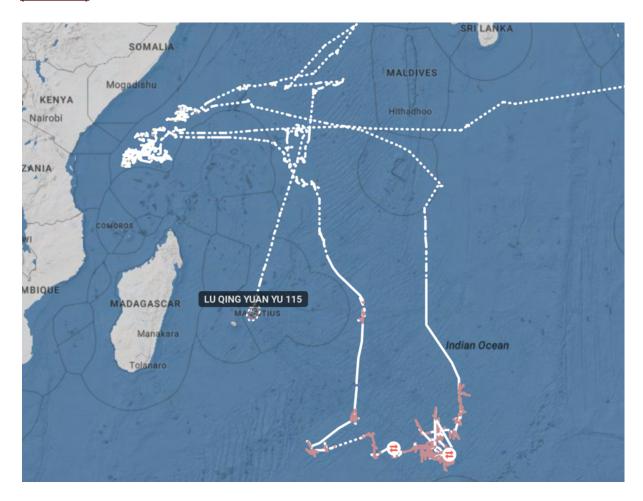
¹⁹ The Coalition for Fisheries Transparency. (2023). The Global Charter for Fisheries Transparency. Available at: https://fisheriestransparency.net/

²⁰ EJF. (2023). Murky waters: analysis of the regulatory framework governing the distant water fishing fleet of the People's Republic of China. Available at: https://ejfoundation.org/reports/murky-waters

•	Ensure that foreign-flagged vessels are subject alignment with their obligations under the PSMA.	to	robust	port	entry	protocols,	in
	angilinent with their obligations under the FSIMA.						

Appendices

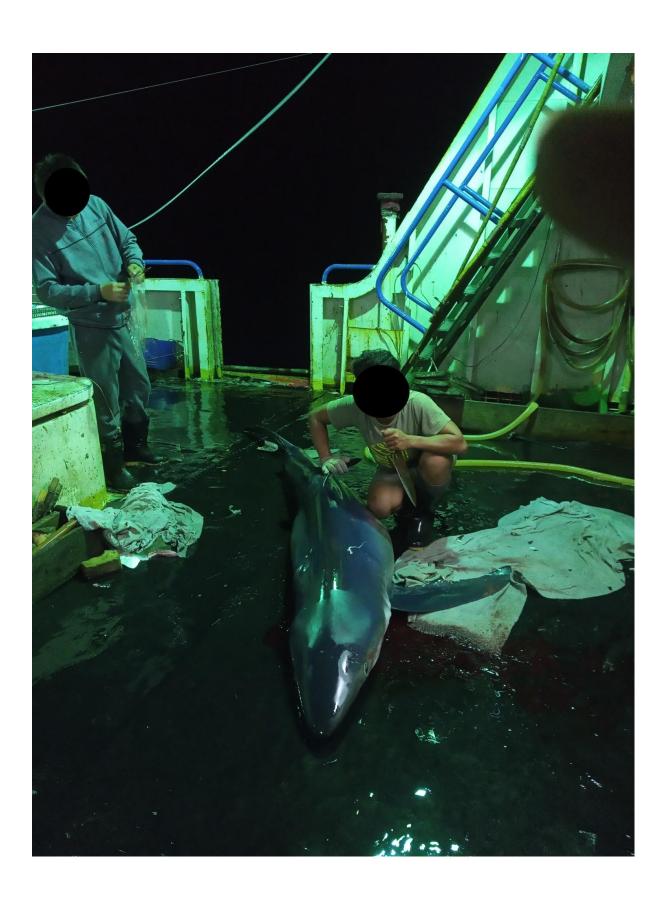
Appendix 1: AIS transmissions of LU QING YUAN YU 115 from December 2020 to October 2021 (Starboard)



Appendix 2: Images received from a crew member depicting catch of sharks whilst on board the LU QING YUAN YU 115







Appendix 3: AIS transmissions of LU QING YUAN YU 116 from September 2019 to January 2022 (Global Fishing Watch)



Appendix 4: Crew member poses with shark on board the LU QING YUAN YU 116 (identified as a possible Shortfin Mako Shark)



<u>Appendix 5: LU QING YUAN YU 116's AIS transmission gaps in Seychellois EEZ (Starboard)</u>



Red lines indicate suspected fishing activities, white lines indicate vessel in transmit, dotted lines indicate gaps in AIS transmissions

Appendix 6: Crew injuries on board the LU QING YUAN YU 116







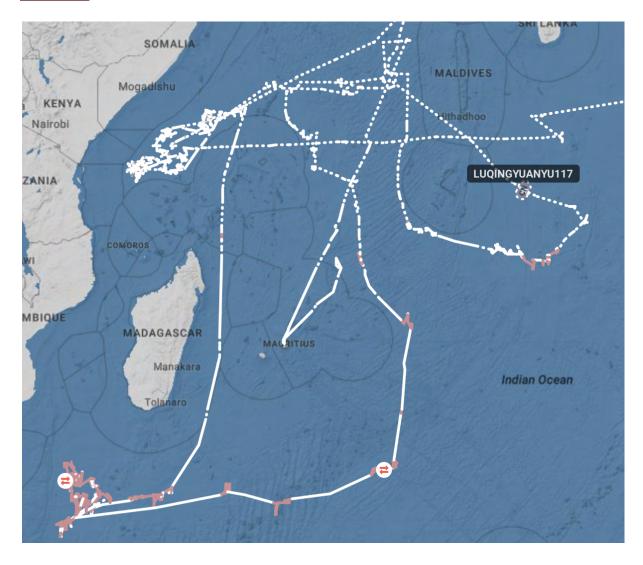


Appendix 7: Images received from crew members depicting physical injuries obtained whilst on board the LU QING YUAN YU 116





Appendix 8: AIS transmissions of LU QING YUAN YU 117 from December 2020 to January 2022 (Starboard)

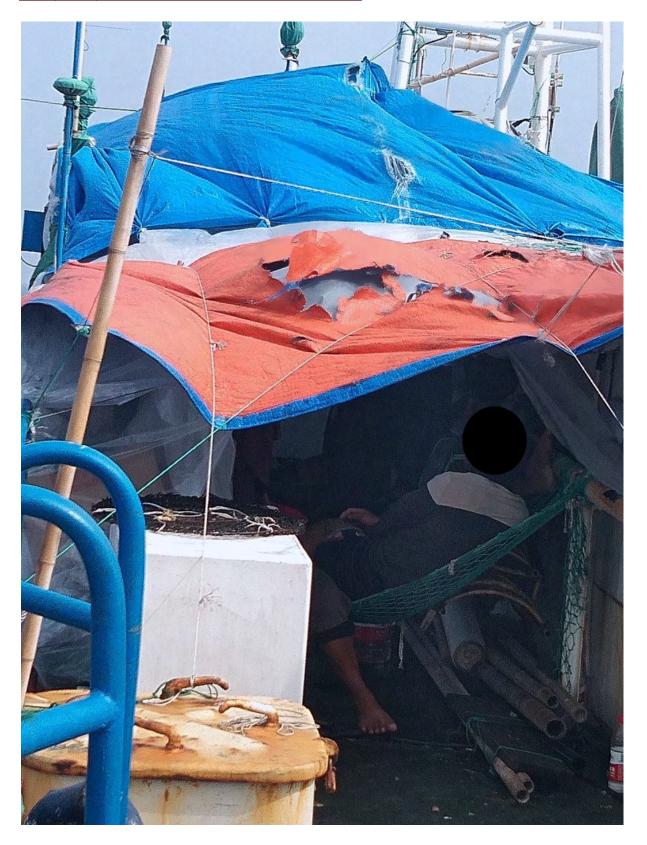


Appendix 9: A screenshot of a video received from crew members depicting the catch of a dolphin

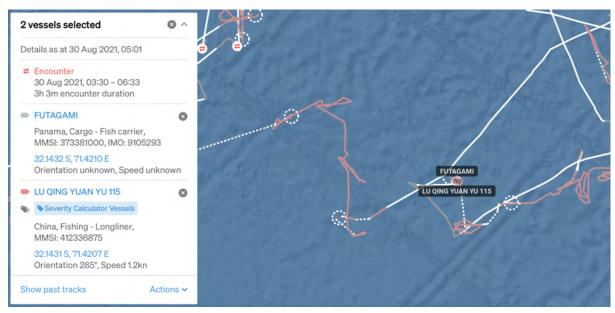




Appendix 11: A photo received from crew members depicting their living conditions when forced to stay on top of LU QING YUAN YU 117 due to the strike



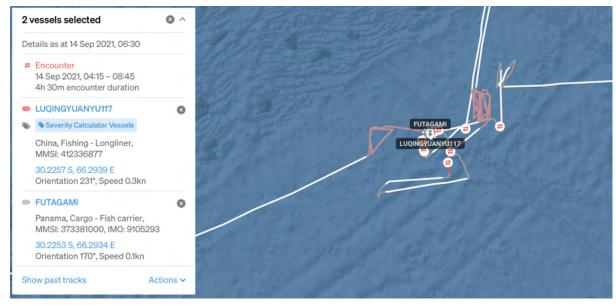
Appendix 12: Suspected trans-shipments between FUTAGAMI reefer and vessels in alert (Starboard)



Trans-shipment between LU QING YUAN YU 115 and FUTAGAMI on 30.08.2021



Trans-shipment between LU QING YUAN YU 116 and FUTAGAMI on 15.09.2021



Trans-shipment between LU QING YUAN YU 117 and FUTAGAMI on 14.09.2021