The Environmental Justice Foundation (EJF) is an international not for profit organisation working globally to combat illegal, unreported and unregulated (IUU) fishing. EJF promotes and encourages international information-sharing to enhance transparency in the fisheries sector.

To this end, EJF gathers information on fishing vessels’ identities and activities through a combination of field investigations, satellite monitoring, open-source intelligence, community surveillance projects and the gathering of human intelligence.
In 2022, EJF started a project in Cameroon. This project, funded by Oceans 5, associates our organisation with the Ministry of Livestock, Fisheries and Animal Industries (MINEPIA) and the African Marine Mammal Conservation Organization (AMMCO), a non-governmental organisation based in Cameroon. It aims to strengthen Cameroon's capacity to fight against IUU fishing through improved governance and legal frameworks, transparency and strengthened monitoring, control and surveillance systems. This will contribute to the sustainable management of the country's marine resources and fleet.

In this context, EJF is supporting the Government of Cameroon in its efforts to adopt transparency measures and improve the country's performance as a flag state.

This briefing provides a detailed analysis of Cameroon's fishing and fishing-related fleet. It includes recommendations for how the Government of Cameroon could take steps to address the challenge posed by the country's flag state policy and the Cameroonian distant-water fishing and fishing-related fleet.

Methodology

This briefing maps the size and scope of Cameroon's fishing and fishing-related fleet. To that end, EJF analysed relevant databases and datasets as well as other sources. A list of databases, datasets and sources considered during the analysis can be found below:

- Global Integrated Shipping Information System, International Maritime Organization;
- Sea-web™, IHS Markit, S&P Global;
- Spire ShipView™, Spire Global, Inc;
- Starboard Maritime Intelligence, Xerra Earth Observation Institute Limited; and
- Other sources (e.g., classification societies, EJF's investigations, governmental authorities, regional fisheries management organisations, Trygg Mat Tracking, open sources).

It is of note that Cameroon has not yet uploaded information in the FAO Global record of fishing vessels, refrigerated transport vessels and supply vessels.

As is the case with many countries, Cameroon's fishing and fishing-related fleet is characterised in some aspects by a lack of transparency. This opacity can make certain strands of research in fisheries, such as in this briefing, challenging. Considering this, data limitations must be acknowledged.

A diverse array of data sources were considered which may not be comparable in terms of confidence level/data quality, and it is possible that some data is outdated. As such, EJF notes that it is important that appropriate verifications by the competent authorities are undertaken to validate the findings made. EJF provided all relevant data and information to the Government of Cameroon. EJF stands ready to contribute to the verifications that this briefing may trigger.
Results and analysis

Finding 1: The size of Cameroon’s fishing and fishing-related fleet is significant

Based on data available from the sources previously mentioned, EJF identified 206 fishing and fishing-related vessels reportedly flying the flag of Cameroon. The total tonnage of the fleet is estimated to amount to 165,409 GT with an average reported length of 43.5 meters.

185 of the identified vessels were categorised as fishing vessels (i.e., “catching vessels”) and 21 either as refrigerated transport (“reefers”; 15), research (three) or support (three) vessels.

Cameroon’s fleet structure

EJF notes that 20 of the fishing and fishing-related vessels identified may have been deregistered by the Cameroonian authorities, have seen their registration expiring or have been broken up / listed as “total loss” (e.g., MARSHAL NOVIKOV, IMO: 8036108). 18 additional vessels were identified as having their existence in doubt (e.g., ANNE DE BRETAGNE, IMO: 5071810), having potentially changed flag (e.g., B MARU 4 or ETERNAL 1, IMO: 7116896) or possibly not engaging in fishing or fishing-related activities (though reported as “fishing vessels”; e.g., LK VICTORIA, MMSI: 613012020). Nonetheless, all these vessels were considered for the purpose of this analysis considering their relevance for possible follow-up verifications and to elucidate (re)flagging patterns around Cameroon’s flag.
Finding 2: The expansion of Cameroon’s fishing and fishing-related fleet is recent

A date or period of registration in Cameroon could be identified with varying degrees of certainty for 127 fishing and fishing-related vessels. 66 vessels (approx. 52%) were identified as having registered in Cameroon during the past five years.

These 66 vessels would account for 87% of the total tonnage of the fleet. This later finding is corroborated by the type of vessels having recently registered in Cameroon which include 23 large-scale (pelagic) trawlers / fish factory vessels (between 3,174 and 6,144 GT and above 90 meters in reported length), 14 of which could still be active.

The average age of the vessels having recently registered in Cameroon is 36 years, significantly more than that of the world’s fleet which was estimated at 21.9 years in 2022. EJF notes that this finding is consistent with some of the reflagging patterns under Cameroon’s flag by which some vessels were granted the country’s flag shortly before being dismantled, possibly for their last voyage (e.g., STAR SKN-151 (IMO: 8136300) built in 1983, reportedly reflagged to Cameroon in October 2021 presumably in the port of Las Palmas, Spain, and broken up in December 2021 in Alang, India).

It is of note that 26 vessels (approx. 39% of the vessels having registered during the past five years) would have registered in Cameroon after the country was notified by the European Commission of the possibility of being identified as non-cooperating third countries in accordance with the criteria laid down in Article 31 of Council Regulation (EC) No 1005/2008 of 29 September 2008 (i.e., “pre-identification” or “yellow card”; February 2021).

Cameroon’s pre-identification decision emphasised on the country’s performance as a flag State noting, inter alia, that “Cameroon has also registered many fishing vessels under its flag in the past months (including IUU listed vessels), which raises serious concerns on the ability of Cameroon to efficiently control and monitor the activities of its fleet, particularly its segment operating outside waters of Cameroon and those that have already engaged in illegal fishing activities”. In January 2023, the European Commission identified Cameroon as a non-cooperating third country in the fight against IUU fishing (“red card”). This decision implies sanctions. The European Commission outlined that post-“yellow card” registrations in Cameroon played as an important factor in its decision.

In addition, EJF could identify 8 vessels having reflagged to Cameroon from countries that were either subject to a “pre-identification” decision / “yellow card” or an “identification” decision / “red card” by the European Commission at the time of the reflagging operation (i.e., Cambodia, Comoros, Panama, Saint Kitts and Nevis, Saint Vincent and The Grenadines, Sierra Leone).
Finding 3: The recent expansion of the Cameroonian fishing and fishing-related fleet mainly includes foreign-owned vessels and vessels listed on IUU lists

As part of this analysis, EJF researched – based on data available from the sources previously mentioned – into the reported structure of ownership of Cameroon’s fishing and fishing-related fleet. To do so, EJF collected information on the reported owners of Cameroon’s fishing and fishing-related vessels. This includes information on the identities of group owners, beneficial owners or registered owners (legal and/or natural persons). When available, EJF listed the information available for the highest degree of ownership (i.e., group owners/beneficial owners). To identify whether these owners are based in Cameroon or offshore, EJF also collected information on the jurisdiction where they are based.

EJF notes that ownership information could be retrieved for 171 vessels, non-Cameroonian (or “offshore”) ownership was identified for 107 of these vessels (approx. 63%). These ownership structures are connected to 32 different jurisdictions. Out of the 66 vessels identified as having registered in Cameroon during the past five years, 58 (approx. 88%) were identified as being connected to an offshore ownership entity. This is indicative of a recent massive influx in foreign fishing and fishing-related vessels.

Ownership origin of Cameroon’s fleet

Ownership origin of new vessels

In addition, four vessels having been listed as having carried out IUU fishing activities (“IUU vessels”) by various regional fisheries management organisations (RFMOs) were identified as having reportedly registered in Cameroon during the past five years. These vessels are identified as follows: FREEDOM 7 (IMO: 7302548), PROGRESO [IRCS: TJMC30], SEA VIEW [IMO: 8692342] and SEA WIND [IMO: 8692354]. The Cameroonian authorities reported having deregistered the PROGRESO, SEA VIEW and SEA WIND respectively in May 2021 (PROGRESO) and October 2019 (SEA VIEW and SEA WIND). However, these three vessels are still listed under the flag of Cameroon by the RFMO that initially listed them (Indian Ocean Tuna Commission (IOTC)). Similarly, the SEA VIEW and SEA WIND are still reported as flying the flag of Cameroon by the authorities of the port State where they are currently located (Bangladesh). More information on the FREEDOM 7 can be found in Case Study 1. EJF notes that other presumed Cameroonian vessels were recently found to be associated with illegal fishing activities although not listed as IUU vessels by any RFMO (e.g., KONYUI [IMO: 7607613, see Case Study 2] and OLUTORSKY [IMO: 8826151]).
Based on data available from the sources previously mentioned, EJF also endeavoured to map the areas of operation of Cameroon’s fishing and fishing-related fleet. Areas of operation or locations could be identified for 120 vessels. EJF found that the area of operation of 45 vessels relates to Cameroon (approx. 38%). All other vessels for which an area of operation could be identified were connected to distant-water operations (i.e., outside Cameroon’s exclusive economic zone (EEZ)). This includes significant operations in distant-fishing grounds in Angola and Mauritania, but vessels of Cameroon’s fleet were also found operating in more distant geographies such as in the Mediterranean Sea, East Asia and, possibly, the Southern Ocean.

When considered under the lens of fishing authorisations, information collected from the competent authorities of Cameroon indicates that up to 41 vessels could have been authorised by the MINEPIA in 2022. That represents only 20% of the 206 fishing and fishing-related vessels identified and considered in the context of this briefing (all of which reportedly were flagged to Cameroon before or in 2022). The 41 authorisations that could have been granted exclusively covered Cameroon’s EEZ and fishing vessels. This is consistent with the scope of Cameroon’s current fisheries legal framework which does not encompass activities outside the country’s waters and fishing-related activities. 56% of the fishing vessels authorised in 2022 for which ownership information could be retrieved have non-Cameroonian (or “offshore”) ownership. 83% of these vessels have been found to be connected to offshore ownership entities in China.
Case Study 1: FREEDOM 7

The vessel FREEDOM 7 (IMO: 7302548) was first listed as an IUU vessel by the International Commission for the Conservation of Atlantic Tunas (ICCAT) in 2006 under the name “NO. 101 GLORIA” / “GOLDEN LAKE” with its flag unknown. The vessel had been sighted fishing in the Mediterranean Sea during a closed season. At the time of writing this briefing, it is listed as an IUU vessel in six RFMOs (i.e., Commission for the Conservation of Southern Bluefin Tuna (CCSBT), General Fisheries Commission for the Mediterranean (GFCM), ICCAT, IOTC, North East Atlantic Fisheries Commission (NEAFC), Southern Indian Ocean Fisheries Agreement (SIOFA))23. As such, it is subject to a wide range of sanctions.

The vessel reportedly entered service on 25 February 1973 (date keel laid: 16 November 1972) as a fishing vessel and was converted as a fish carrier (2006) and reefer (2010). Since it entered service, the vessel has been known under 16 different names (nine since 2010) and eight different flags (six since 2010). This is indicative of “flag hopping”; the practice of repeated and rapid changes of a vessel’s flag often for the purposes of circumventing conservation and management measures or provisions adopted at a national, regional or global level or of facilitating non-compliance with such measures or provisions24.

Cameroon is its most recent reported flag. The vessel reportedly registered in the country in April 2021 under the identity of FREEDOM 7. Maritime databases indicate that it could be linked to “LONG-TENG INT’L TRADING CO., LTD.”, a legal person based in Hong Kong, China.

The list of IUU vessels maintained by the ICCAT indicates that the vessel was observed near the port of Shidao, China, in October 202225. The presence of the vessel in the port of Shidao, China, is consistent with data available from the port State control database of the Memorandum of Understanding on Port State Control in the Asia-Pacific Region, known as the Tokyo MOU, which indicates that the vessel has regularly been using East Asian ports in the past decade. It is of note that over this period the vessel was detained on several occasions and identified as a “high risk ship” under the Tokyo MOU26.

Although Cameroon is not a member of any of the RFMOs mentioned above, the possible registration of the vessel FREEDOM 7 under the country’s flag highlights flaws in Cameroon’s registration procedures to prevent fishing and fishing-related vessels engaged in IUU fishing activities from being granted the country’s nationality. In addition, it should be assessed whether such registration would be in line with the provisions of the Code Communautaire de la marine marchande (e.g., nationality).
Case Study 2: KONYUI

Using satellite data, EJF identified that in February 2021, the fishing vessel KONYUI (IMO: 7607613) was operating in closed areas and areas not covered by its fishing licence in Guinea (Conakry). EJF's investigation found that the vessel was actively fishing when detected in these areas. Based on information published by the Guinean authorities, EJF found that the KONYUI was flying the flag of Cameroon and owned by a legal person based in Guinea (“SOCIETE MS 5 MARINE COMPANY GUINEA SARL”). EJF alerted the Guinean authorities who initiated an investigation into the vessel's activities which led to them to impose sanctions on the vessel (including, reportedly, a fine of €100,000).

The KONYUI was last located by EJF in November 2022 in the port of Dakar, Senegal, together with the YANCHUI, a vessel owned by the same legal person. The KONYUI is listed in the database on reported incidents of abandonment of seafarers of the International Labour Organization (ILO). This database contains a regularly updated list of vessels that have been reported to the ILO as abandoned. According to the information stored in that database, 9 seafarers of the KONYUI would have been abandoned, unpaid for at least 7 months, in Dakar on 1 January 2022.
Observations

EJF’s analysis evidences that:

1. The size of Cameroon’s fishing and fishing-related fleet is significant.
2. The expansion of Cameroon’s fishing and fisheries-related fleet is recent.
3. The recent expansion of the Cameroonian fishing and fishing-related fleet mainly includes foreign-owned vessels and vessels listed on IUU lists.
4. Cameroon’s fishing and fishing-related fleet engages in distant-water fishing activities.

Our research found that 52% of the vessels in Cameroon’s fleet were added in the past five years. Even more strikingly, these vessels make up 87% of the total tonnage of the fleet, and 88% of the new vessels would be owned by foreign interests. Almost all operate outside Cameroon’s waters. This means there has been a surge in the number of large foreign-owned vessels, some of which appear on illegal fishing registers, flying the flag of Cameroon around the world.

Contrary to the 41 industrial fishing vessels authorised to operate in the country’s EEZ in 2022, the Cameroonian distant-water fishing and fishing-related vessels have little to no Cameroonian ownership, do not fish in the country’s waters, do not land fish at the country’s ports, and do not appear to employ Cameroonian fishers. Several of them have been found to have a record of poor compliance.

The Public Treasury’s special allocation fund for the production of secured transport documents epitomises how little these vessels bring to the country: in 2021, just FCFA 17,000,000 (approx. €26,000) were reportedly generated from certificates of registry and less than FCFA 120,000,000 (approx. €200,000) from all maritime-related operations covered by the fund.

As early as 2020, EJF raised concerns about Cameroon’s flag state performance and the expansion of its international fishing and fishing-related fleet; particularly in a context where the revision of the country’s fisheries legal and regulatory framework is still ongoing, the efforts to establish a structured and formal cooperation mechanism around vessel registration still to materialise and the country’s monitoring, control and surveillance system to be built. This situation echoes the reasons that led the European Commission to issue a “red card” against Cameroon.

Recommendations

While, in the short term, this situation damages Cameroon’s reputation as a responsible fishing nation, the experience of other countries has shown that this situation can be reversed in a couple of months to the benefit of the country, its people and of the socio-economic development of the fisheries sector. Cameroon can become a regional champion in the fight against IUU fishing and ocean governance.

Against this background, and to preserve the efforts made so far by Cameroon at increasing its capacity to fight against IUU fishing and at strengthening its fisheries governance framework, EJF advocates strong and immediate decisions – underpinned by transparency and consistent with international law and standards – to be taken at the highest levels of the State to address the country’s performance as a flag state.
EJF recommends the Government of Cameroon to:

**Immediate actions:**

1. Effectively **enforce a moratorium on the registration of distant-water fishing and fishing-related vessels** under the flag of Cameroon.

2. **Deregister Cameroonian distant-water fishing and fishing-related vessels** and inform all relevant authorities and bodies of the decision taken to deregister such vessels and close Cameroon’s international fishing and fishing-related registry.

3. **Investigate any suspected IUU fishing and associated illegal activities** involving Cameroonian fishing and fishing-related vessels and **impose sanctions adequate in severity** in respect of any confirmed violations and proactively share relevant information.

4. **Complete the consolidation of the national registry of fishing and fishing-related vessels** and upload relevant information on the FAO Global Record of Fishing Vessels, Refrigerated Transport Vessels and Supply Vessels and / or on the website of the MINEPIA.

**Short term actions:**

5. **Complete the revision of Cameroon’s fisheries legal and regulatory framework**, ensuring it meets regional and international standards.

6. In line with international law and best practices, **establish a structured and formal cooperation mechanism between the MINEPIA and the Ministry of Transport** that makes the granting of the Cameroonian nationality to fishing and fishing-related vessels conditional on the approval of the MINEPIA.

7. Such system should ultimately aim at:

- **Avoiding flagging vessels with a history of non-compliance** and vessels upon which Cameroon cannot exercise its responsibility to ensure that they do not engage in IUU fishing and associated illegal activities, and which do not maintain a “genuine link” with Cameroon such as “flag of convenience” fishing and fishing-related vessels;

- **Ensuring a balance** between the size of Cameroon’s fishing and fishing-related fleet, the country’s monitoring, control and surveillance capacity and the status of fish populations; and

- **Preventing any future development of a “flag of convenience”** for fishing and fishing-related vessels and the economic and reputational damages associated to it.
**Mid-term actions:**

8. **Ratify and effectively implement relevant international and regional fisheries-related instruments** such as the 2009 Agreement on Port State Measures, the 2007 Work in Fishing Convention and 2012 Cape Town Agreement.

9. **Build a robust monitoring, control and surveillance system** to minimize risk of IUU fishing activities in the country’s EEZ or by the country’s fishing and fishing-related fleet.

**Horizontal considerations:**

10. **Achieve improved cooperation and dialogue** between Cameroon and the relevant authorities, bodies and organizations.

It is of note that while the project jointly implemented by the MINEPIA, AMMCO and EJF contributes to realisation of several of the recommended measures, these can be successful only if ambitious and lasting reforms are undertaken to address the country’s flag state performance and ensure that only legal, ethical and sustainable fishing takes place under Cameroon’s flag.

EJF is committed to continuing accompanying the efforts deployed by the Cameroonian authorities.
This briefing does not include information from a draft registry of Cameroonian industrial fishing vessels dated from 2014 which the authorities shared with EJF. EJF chose not to include this data as the registry remained a draft, included only partial data and pertains to vessels that weren’t listed in more recent governmental lists and about which it exists information that they fly the flag of foreign countries (e.g., STAR SHRIMPER fleet which is reportedly flagged to Nigeria). EJF stands ready to further analyse this situation with the Government of Cameroon and to amend this briefing if necessary.


7 Based on the sum of the tonnage of individual vessels when available (data not available for 20 vessels).

8 Data not available for 12 vessels.

9 Confidence in the accuracy of dates and periods of registration of, for example, older vessels having presumably registered in Cameroon in the 1990’s is relatively low. Conversely, confidence is relatively high for large vessels having recently registered in Cameroon and for which, often, several sources can be cross-checked.


16 Anguilla, Belize, British Virgin Islands, Chile, China (and Hong Kong), Cyprus, Djibouti, France, Greece, Guinea, Latvia, Lithuania, Malta, Marshall Islands, Mauritania, Monaco, Norway, Panama, Russia, Saint Vincent and The Grenadines, Senegal, Seychelles, Singapore, Spain, Sri Lanka, Thailand, Togo, Turkey, United Arab Emirates, United Kingdom and USA.


20 Ver Angola, Angolan authorities seize Russian vessel with more than 1200 tonnes of fish, dated 03.07.2020, accessed 20.01.2023, https://www.verangola.net/oa/en/072020/Defense/20733 (Angolan authorities seize Russian vessel with more than 1200 tonnes of fish.htm


30 This may include the relevant services of the European Union, regional fisheries management organisations and regional fisheries bodies, the International Maritime Organization, the FAO, INTERPOL and relevant states. EJF stands ready to facilitate contacts where needed.

31 This briefing and information may be used to cross-check data collected by the Cameroonian competent authorities.