
ZHEJIANG OCEAN FAMILY CO. LTD AND ITS FISHY BUSINESS

**Illegal, unreported and unregulated (IUU) fishing
and serious human rights abuses on vessels belonging to
or associated with The Zhejiang Ocean Family Co. Ltd**



Tuna trans-shipment on one XIN SHI JI vessel.

Introduction

The Zhejiang Ocean Family Co., Ltd. (大洋世家(浙江)股份公司 / ZOF) is a leading fishery company in Chinese and global seafood supply chains. In 2020, it accounted for 14.63% of all Chinese tuna production.¹ This investigation found that 12 vessels owned or chartered by ZOF or a ZOF subsidiary, which share the same name, XIN SHI JI, in different number sequences, were systematically engaged in different forms of IUU fishing such as shark finning, intentionally killing cetaceans. Vessels were also implicated in a number of human rights abuses including physical abuse, salary deductions, human trafficking and forced labour.

Of the 12 investigated vessels, 11 of them frequently used at-sea trans-shipment with refrigerated cargo vessels (carriers) flagged to Panama, Korea and China to access ports and markets including China, Korea, Japan and French Polynesia. Through trans-shipments, these vessels were able to receive fuel and supplies, enabling them to stay at sea for extended periods of up to two years without returning to port. Those that went back to ports visited Busan (Korea), Papeete, French Polynesia (France) and Singapore.

In 2021, ZOF unsuccessfully attempted to be publicly listed on the Shanghai Stock Exchange, and the second attempt was also cancelled.² Through publicly available trade data and the company's Initial Public Offering (IPO) prospectus, EJF found that ZOF supplied tuna to some major international seafood distributors, including FCF, Mitsubishi, Maruha Nichiro Corporation and Tri Marine Group. These companies in turn supply many household brands including Amazon, Bumble Bee Foods, Rakuten and Walmart.

Japan has been ZOF's most important market for ultra-low temperature tuna, but it appears to be diversifying in order to reduce the risk of over-dependency on this market. Between 2018 and 2021, revenue from the Japanese market accounted for 11.22%, 11.9%, 10.49% and 8.23% of the company's total revenue respectively.^{3,4} The fleet was also supported by generous subsidies from the Chinese government - US\$10.9 million in 2019, US\$12.1 million in 2020 and US\$11.3 million in 2021.⁵

This briefing, based on crewmembers' testimony, photographic and filmed evidence, AIS data and open-source intelligence, provides detailed information regarding IUU fishing offences and human rights abuses committed across a number of XIN SHI JI vessels. Detailed recommendations are provided at the end of this briefing to the flag states, port states, market states and relevant Regional Fisheries Management Organizations (RFMOs).

There is no suggestion that the buyers of ZOF seafood had any knowledge of the allegations of IUU fishing or other issues documented in this briefing. The inclusion of the names of ZOF's main customers in this briefing – using information made public by ZOF itself – is to highlight the widespread, international footprint of ZOF seafood in global seafood supply chains.

To protect the identity and safety of our sources, the case studies of the individual vessels are not published but can be provided upon request.

Methodology

The information used in this report is based on three main sources - publicly disclosed information, testimony and images from crew, and satellite data. Public information was gathered from websites including maritime database Sea-web, shipment record database Panjiva, and the two IPO prospectuses published by ZOF. The Chinese government stopped publishing customs records in 2018, however, records are published by many of the importing countries ZOF trades with, including the USA, Japan, Mexico, Ecuador and Indonesia.⁶ ZOF's prospectuses cover a reporting period between 2018 and the first half of 2022,⁷ which helps to provide an overview of the company's ownership and its connections with several overseas subsidiaries and significant trade partners. EJF uses the rate of 1 CNY = 0.14 USD for all financial information originally disclosed in CNY for this briefing.

The testimony of crewmembers was gathered by EJF's investigators in Indonesia, the most common home country of migrant workers on many key distant water fishing (DWF) fleets. EJF investigators have worked alongside Indonesian and international NGOs, local authorities, and fishers' associations to identify and meet fishers who recently worked on DWF vessels and have since returned home. Upon receiving informed and written consent from fishers, EJF investigators conducted audio-recorded and/or filmed interviews to gather testimony, using a standardised open-ended interview format, which included questions regarding the crew's basic personal information, their recruitment process, fishing practices on board the vessel and living and working conditions. EJF follows ILO Indicators of Forced Labour in identifying human and worker rights violations.

EJF collected and analysed other evidence to further corroborate interviewee testimonies. These sources included copies of employment contracts, passports and visa information, as well as verified vessel identifications from official vessel databases. EJF also collects relevant photos and videos from crewmembers (with their consent).

In total, EJF interviewed 20 crewmembers in Indonesia who worked on 12 XIN SHI JI vessels between January 2018 and September 2022. Of the 20 interviewees, 13 started working between 2018 and 2019 and returned home in 2020, six worked on the fleet between 2019 and 2021, and one joined the vessel in 2022. EJF interviewed 16 fishers within six months of them returning from sea. In this briefing, 'investigated period' refers to the period between January 2018 and September 2022, and 'investigated vessels' refers to the 11 XIN SHI JI vessels owned by ZOF and operated by ZOF or a ZOF subsidiary, and one vessel chartered by a ZOF subsidiary from Zhoushan Pacific Tuna Pelagic Fishery. Although one vessel on the list is not owned by ZOF, it was under the operational control of a ZOF subsidiary within the framework of a chartering contract. The vessel list is provided in the section 'Reports of IUU fishing and human and workers' rights violations.'

In order to corroborate information provided by crewmembers, identify suspected instances of trans-shipment at sea and to track vessel movements including visits to port, EJF used satellite-based tracking systems (Global Fishing Watch and Starboard) which allow for the observation of vessels equipped with AIS transponders. While such data have limitations (e.g., AIS transponders can be switched off or manipulated, or accuracy can vary depending on location), the analysis of satellite data through such platforms remains an effective and widely used tool in fisheries management. If a vessel appears to have trans-shipped (identified through inbuilt 'encounter' algorithms available on both of the above named platforms⁸), ports at which the 'receiver' vessel visited following a suspected trans-shipment were considered potential market links (see **Table 4**). Likewise, if a vessel was listed on either the EU's DG SANTE list of non-EU establishments authorised to export to the EU, and/or Japan's OPRT list, it was likewise considered to potentially be linked to one of these markets.

A combination of the above methods and information led to the identification of 39 apparent at-sea encounters between 12 investigated XIN SHI JI vessels and 11 refrigerated cargo vessels (carriers) that later travelled to French Polynesia, Japan, Korea and Taiwan between 2018 and 2022, indicating possible market access into these countries by XIN SHI JI vessels.

Vessels and ownership structure

ZOF is not owned by the Chinese government, but it has a close relationship with the government because of its beneficial owner and shareholding structure. Its ultimate beneficial owner is a member of China's National People's Congress, and state-owned companies still control 20% of ZOF's shares. According to its IPO prospectus, ZOF owns 22 tuna longliners that fly the Chinese or Kiribati flags, seven tuna purse seiners that fly the Chinese or Kiribati flags and 13 squid jiggers that fly the Argentinian flag.

ZOF is privately owned by a Chinese conglomerate, Wanxiang Sannong Group (万向三农集团有限公司), whose ultimate beneficiary is Lu Weiding (鲁伟鼎).⁹ Mr Lu Weiding is a member of the 14th National People's Congress of the People's Republic of China,¹⁰ vice chairman of the China Enterprise Confederation / China Enterprise Directors Association¹¹ and vice chairman of the All-China Federation of Industry and Commerce.¹²

According to the prospectus, ZOF was first established as a state-owned company in 2009, and at the time, Zhejiang Ocean Fisheries Group (浙江省远洋渔业集团有限公司), a fishing enterprise established by several Zhejiang governmental entities controlled 70% of ZOF's shares, while privately-owned Wanxiang Sannong Group controlled 30%. Over the years, however, Wanxiang Sannong Group increased its shares until ZOF became entirely controlled by Wanxiang Sannong Group, with Lu Weiding named as the ultimate beneficial owner.¹³ Lu Weiding holds 74.57% of Wanxiang Holdings (中国万向控股有限公司), which itself controls 76.5% of Wanxiang Trust (万向信托股份公司).¹⁴ Wanxiang Trust in turn controls 100% of Wanxiang Sannong Group, which owns 90% of ZOF's shares.¹⁵

Chinese state-owned companies still maintain a partial and indirect interest in ZOF, as 23.5% of the shares of Wanxiang Trust remain held by state-owned companies such as the Zhejiang Tobacco Investment Management Co., Ltd. (浙江烟草投资管理有限责任公司), according to Wanxiang Trust's annual report.¹⁶

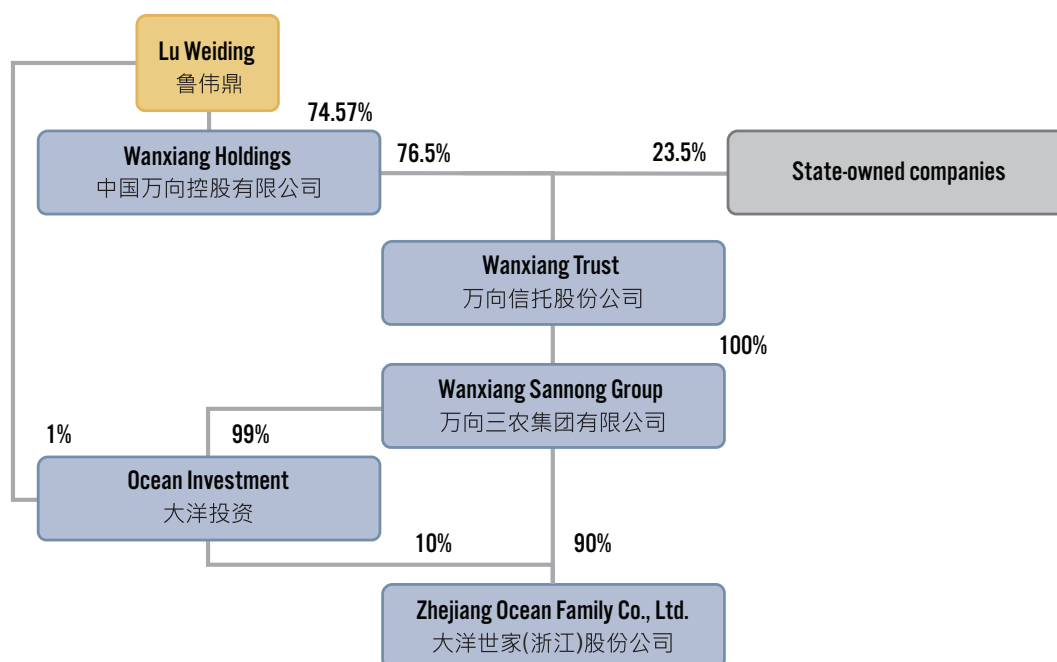


Figure 1: The shareholding structure of ZOF.

Chartering (the temporary placing of a vessel under the control of another company through a charter agreement) is a common and legal practice for fishing vessels. EJF found that ZOF's subsidiary, the Kiritimati Island Fish Co. Ltd., has chartered ten vessels from Zhoushan Pacific Tuna Pelagic Fishery Co., Ltd. (舟山太平洋金枪鱼远洋渔业有限公司), a subsidiary of Ningbo Fengqun Foods, to fish in Kiribati's EEZ along with 13 of ZOF's own vessels.¹⁷ The chartering relationship and the trading relationships indicate connections between these companies.

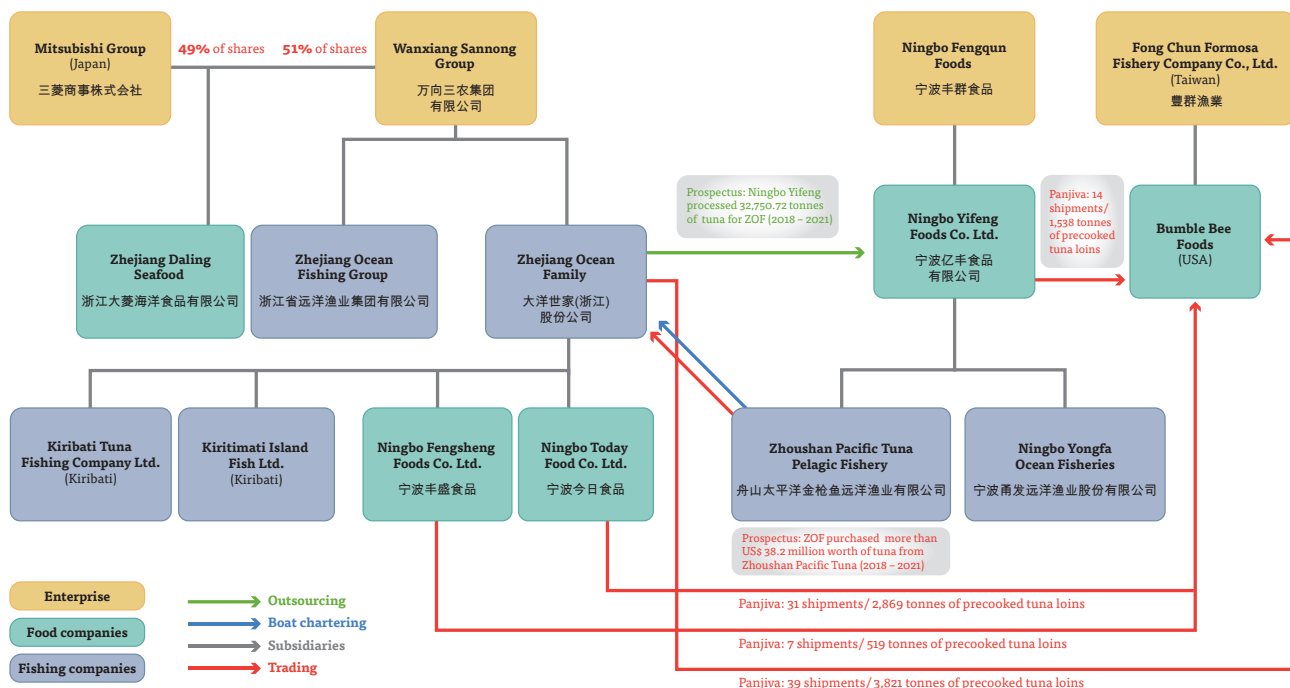


Figure 2: The ownership, chartering, outsourcing and trading relationships between ZOF and other companies.

Subsidies provided by the Chinese government

ZOF's total government subsidies were US\$41.7 million between 2018 and 2021, according to its IPO prospectuses.¹⁸ Across all categories, the single largest subsidy source provided by the Chinese government is the subsidy for the "Utilisation of International Fishery Resources" (国际渔业资源开发利用). Between 2018 and 2021, ZOF received more than US\$22.3 million in such subsidies, exceeding half the total amount. Two policy notification letters published in 2016 by the Chinese government suggest that fuel subsidies, one of the largest sources of harmful subsidies, are merged into this "Utilisation of International Fishery Resources" category.^{19,20}

Table 1: Subsidies received by ZOF from the Chinese government

Subsidies category by year (USD thousand)	2018	2019	2020	2021	Sum
Utilisation of International Fishery Resources	2,543.7	6,547.1	5,658.3	7,576.5	22,325.6
Amount of total subsidies	7,310.1	10,937.2	12,192.1	11,342.7	41,782.1

According to the requirements of the Chinese Ministry of Agriculture and Rural Affairs (MARA), vessels should not conduct prohibited activities - including "fishing fish species or other marine organisms prohibited by China, coastal state for fishing access (入渔国) or international organisations",²¹ if they are in receipt of the "Utilisation of International Fishery Resources" subsidies. If recipients are found to have conducted prohibited activities, these subsidies would be recouped.²² EJF's investigations found that many of the vessels observed in this investigation were reportedly involved in activities which would be deemed "prohibited" under this policy but there is no published information indicating that the subsidies were retrieved.

Reports of IUU fishing and human and worker rights violations

IUU fishing and human rights abuses were widely reported by crewmembers who had worked on a number of the investigated vessels. The activities reportedly conducted by the vessels violated RFMOs' regulations on live releases of sharks, shark finning and the Chinese Wild Animal Conservation Law prohibiting catches of dolphins.²³ A wide range of ILO Indicators of Forced Labour were also observed across the fleet.

Table 2: Statistics of reported IUU fishing and human and worker rights violations by investigated XIN SHI JI vessels

Reported abuses		% (Number of interviewees, n=20)	% (Number of vessels, n=12)
IUU fishing	Shark finning	60% (12)	67% (8)
	Catching and killing cetaceans	50% (10)	67% (8)
Human and worker rights violations	Requirements to pay guarantee money	40% (8)	50% (6)
	Confiscation of ID documents	80% (16)	75% (9)
	Excessive overtime	80% (16)	83% (10)
	Physical abuse	35% (7)	50% (6)
	Verbal abuse	40% (8)	42% (5)
	Abusive working and living conditions (for example, a lack of medicine, food or water)	50% (10)	67% (8)

According to crewmember testimonies, shark finning is a common practice on the investigated XIN SHI JI vessels. Several species of sharks were caught and slaughtered at an industrial scale across the fleet, including Hammerhead Sharks, Thresher Sharks, Oceanic Whitetip Sharks, Shortfin Mako Sharks, Blacktip Sharks, Blue Sharks, Great White Sharks and Tiger Sharks²⁴. Some of these species are protected, with prohibitions on catching them from the RFMOs the fleet is registered to (see Table 3 below).

Unregulated and destructive fishing was also commonly reported. Photos provided by fishers show at least one Megamouth Shark, a species which is not scientifically not well-researched²⁵ but is increasingly threatened by fisheries in Asia,²⁶ was caught and killed. Fishers also told EJP investigators that pregnant sharks were caught and finned.

“In terms of sharks, only the fins were taken. The bodies were discarded. Then the fins were dried up. There was a specific person who did it, usually the engineer. The fins were put in the engine room, since it was hot so they dried quickly. There were a lot of fins. In terms of the number of sharks, it could be thousands of sharks... Because in each fishing operation, we could get 10 sharks, sometimes more... In one shift, we could catch 20 sharks. If there were a lot of them, it could be 50 sharks caught in a day.”

“(Have you ever caught pregnant sharks?) Yes, oftentimes. The process was the same, their fins were cut off. After they were dead, they were discarded. The babies were left to die.”

- EJP's source from XIN SHI JI A



A megamouth shark caught a XIN SHI JI vessel.



A ray caught on a XIN SHI JI vessel.



A False Killer Whale caught on a XIN SHI JI vessel.

When dolphins and False Killer Whales (*Pseudorca crassidens*, classified as near threatened by the IUCN)²⁷ were caught and killed, their teeth were kept as souvenirs, with the rest of the body being discarded back to sea. The Chinese Wild Animal Conservation Law prohibits catching and killing False Killer Whales and other 16 species of cetaceans.²⁸ Those found guilty of these crimes can be sentenced to more than five years in prison, according to the Chinese Criminal Code.²⁹ The two RFMOs, IATTC and WCPFC, these XIN SHI JI vessels are registered to, have adopted frameworks on the safe handling and release of cetaceans.³⁰ The other RFMO the fleet registered to, the IOTC, includes reporting obligations on interactions with cetaceans in its Resolution 13/04 on the conservation of cetaceans.³¹

Table 3: Shark species protected by RFMOs the investigated XIN SHI JI vessels are registered to.

IOTC	IATTC	WCPFC
<ul style="list-style-type: none"> Common Thresher Shark³² (<i>Alopias vulpinus</i>) - vulnerable³³ Pelagic Thresher Shark³⁴ (<i>Alopias pelagicus</i>) - endangered³⁵ Bigeye Thresher Shark³⁶ (<i>Alopias superciliosus</i>) - vulnerable³⁷ Oceanic Whitetip Shark³⁸ (<i>Carcharhinus longimanus</i>) - critically endangered³⁹ 	<ul style="list-style-type: none"> Oceanic Whitetip Shark⁴⁰ (<i>Carcharhinus longimanus</i>) - critically endangered 	<ul style="list-style-type: none"> Oceanic Whitetip Shark⁴¹ (<i>Carcharhinus longimanus</i>) - critically endangered Silky Shark⁴² (<i>Carcharhinus falciformis</i>) - vulnerable⁴³

Of all the interviewees, 80% reported experiencing excessive overtime, often more than 14 hours and sometimes even up to two days without any appropriate rest. Guarantee money, also known as a security deposit, is an upfront payment charged to the fishers to guarantee that they will fulfil the contract. This practice, which can trap fishers from leaving the job even when experiencing abuses, was also reported, and it was often deducted from their monthly salary. Interviewees reported that they had to pay around US\$1,000 for the guarantee money, equivalent to around three or four months of salary. Of the 12 investigated vessels, four stayed at sea for longer than 22 months. One fisher complained of depression after 15 months of working onboard, but the captain refused to send him home. The depression worsened after three more months at sea and resulted in his suicide. According to another crewmember's testimonies, one fisher died onboard due to illness.

“We came home with the dead body of a crew mate. Our crew mate had been dead on board the vessel for three months. He was stored in the freezer. I asked the captain to dock, but he did not want to due to the COVID pandemic. So the captain kept fishing. Then, later we were able to dock in Fiji. There, the police picked us up. They checked every crewmember and asked us the cause of death of our crew mate. The captain told us to tell the police that his cause of death was due to a fishing hook injury. However, we did not want to lie, so we told them that he died due to an illness - his foot was swollen. At that time, I could not hold back my tears.”

- EJF's source from XIN SHI JI L



Table 4: IUU fishing and human rights violation incidents on the ZOF fleet, and one vessel under the operational control of a ZOF subsidiary; within the framework of a chartering contract, between January 2018 and September 2022 (all vessels are Chinese-flagged)

Vessel name	Time frame	Authorised RFMOs	Operating areas according to AIS	Owner	Charterer	IUU fishing	ILO Indicators of Forced Labour ⁴⁴	Potential market links
XIN SHI JI A	2018 - 2020	WCPFC (High Seas of Pacific Ocean), IATTC	Kiribati, Pacific Oceans (WCPFC, IATTC)	Zhejiang Ocean Family	Kiritimati Island Fish Ltd	Shark finning; killing protected sharks; killing False Killer Whales	Retention of identity documents; deception (forced to work after the contract ends); debt bondage; isolation (stayed at sea for 2 years); physical and sexual violence; abusive working and living conditions; excessive overtime (18 hours to up to 2 days)	EU, Japan, Korea, Taiwan
XIN SHI JI B	2018 - 2020	WCPFC (High Seas of Pacific Ocean), IATTC	Kiribati, Pacific Ocean (WCPFC)	Zhejiang Ocean Family	Kiritimati Island Fish Ltd	Shark finning; killing False Killer Whales	Retention of identity documents; deception (deduction of wages); debt bondage; isolation (stayed at sea for 26 months); excessive overtime (18 hours)	EU, Korea, Taiwan
XIN SHI JI C	2019 - 2022	WCPFC (High Seas of Pacific Ocean), IATTC	Kiribati, Pacific Oceans (WCPFC, IATTC)	Zhejiang Ocean Family	Kiritimati Island Fish Ltd	N/A	Retention of identity documents; deception (not able to read the contract, not returning security deposit as promised); withholding of wages; debt bondage; physical and sexual violence; abusive working and living conditions; excessive overtime (15-18 hours)	EU, France, Japan, Korea, Taiwan
XIN SHI JI D	2019 - 2021	WCPFC (Pacific Ocean), IOTC, IATTC	Somalia, Indian Ocean (IOTC)	Zhejiang Ocean Family	N/A	Shark finning; killing protected sharks; killing False Killer Whales and dolphins	Retention of identity documents; deception (worked on a different vessel to the one specified in the contract); debt bondage; isolation (stayed at sea for 2 years); intimidation and threats; abusive working and living conditions; excessive overtime (18-30 hours)	EU, Japan, Korea, Taiwan, Singapore
XIN SHI JI E	2018 - 2020	WCPFC, IATTC	Pacific Oceans (WCPFC, IATTC)	Zhejiang Ocean Family	Kiritimati Island Fish Ltd	Shark finning; killing False Killer Whales	Deception (deduction of wages); physical and sexual violence; abusive working and living conditions	EU, France, Japan, Korea, Taiwan
XIN SHI JI F	2019 - 2021	WCPFC, IOTC, IATTC	Somalia, Indian Ocean (IOTC)	Zhejiang Ocean Family	N/A	Shark finning; killing False Killer Whales and dolphins	Retention of identity documents; deception (deduction of wages; sent to a Chinese-flagged vessel despite promises to the contrary); withholding of wages(not paid for a year); debt bondage; isolation (stayed at sea for 22 months; another crewmember was believed to commit suicide due to isolation, despite concerns having been raised with the captain); abusive working and living conditions; excessive overtime (19-20 hours)	Japan, Korea, Taiwan, Singapore
XIN SHI JI G	2019 - 2021	WCPFC (High Seas of Pacific Ocean), IATTC	Kiribati, Pacific Ocean (WCPFC)	Zhejiang Ocean Family	Kiritimati Island Fish Ltd	Killing False Killer Whales	Retention of identity documents; debt bondage; isolation (stayed at sea for 16 months); abusive working and living conditions; excessive overtime (18 hours to 2 days)	EU, France, Japan, Korea, Taiwan
XIN SHI JI H	2019 - 2020	WCPFC, IOTC, IATTC	Somalia, Indian Ocean (IOTC)	Zhejiang Ocean Family	N/A	Shark finning	Deception (deduction of wages); debt bondage; isolation (stayed at sea for 11 months)	EU, Japan, Singapore
XIN SHI JI I	2018 - 2020	WCPFC, IOTC, IATTC	Somalia, Indian Ocean (IOTC)	Zhejiang Ocean Family	N/A	Shark finning; killing False Killer Whales and dolphins	Deception (sent to a Chinese-flagged vessel despite promises to the contrary); physical and sexual violence; abusive working and living conditions; excessive overtime (19-20 hours)	EU, Japan, Korea, Taiwan, Singapore
XIN SHI JI J	2018 - 2020	WCPFC (Pacific Ocean), IOTC, IATTC	Somalia, Indian Ocean (IOTC)	Zhejiang Ocean Family	N/A	N/A	Retention of identity documents; excessive overtime (15-16 hours)	Japan, Korea, Singapore
XIN SHI JI K	2018 - 2020	WCPFC, IOTC, IATTC	Somalia, Indian Ocean (IOTC)	Zhejiang Ocean Family	N/A	Shark finning; killing False Killer Whales	Retention of identity documents; debt bondage; physical and sexual violence; excessive overtime (18 hours)	EU, Japan, Korea, Taiwan, Singapore
XIN SHI JI L	2019 - 2021	WCPFC (Pacific Ocean), IATTC	Kiribati, Pacific Ocean (WCPFC, IATTC)	Zhoushan Pacific Tuna Pelagic Fishery	Kiritimati Island Fish Ltd	N/A	Retention of identity documents; debt bondage; isolation (never docked after a new captain arrived); physical and sexual violence; intimidation and threats; abusive working and living conditions; excessive overtime (17-19 hours)	France, Japan, Korea, Taiwan

Note 1: Potential market links in the above table are countries with ports that the fishing vessels visited during the time interviewed fishers were onboard, countries visited after a carrier encountered one of the vessels, or countries that admit their imports (EU's DG SANTE list and Japan's OPRT list). **Note 2:** French Polynesia is mentioned as France in the above table

Links with market states through ports and carriers

All 12 XIN SHI JI vessels EJJ investigated could have links to major seafood markets, including the EU, Japan, Korea, Taiwan and Singapore. AIS data gathered by EJJ indicates that the investigated vessels have visited ports located in French Polynesia, Korea and Singapore, suggesting that these vessels may have been supplying illegally caught fish products to major seafood markets through these ports. The vessels EJJ investigated could also be linked to these countries through at-sea trans-shipment with carriers which visited ports in French Polynesia, Korea, Japan and Taiwan after at-sea encounters with the fishing vessels.

Of all 12 vessels, 9 are on the DG SANTE list,⁴⁵ and 11 are on the Japan OPRT list.⁴⁶ The EU requires all imported animals, animal products, certain food and feed of non-animal origin and the majority of plants must comply with applicable requirements, and only those certified and listed on the DG SANTE list are allowed to enter its market.⁴⁷ The OPRT list contains vessels recognised by their flag states and authorised and registered with relevant RFMOs. Vessels that export frozen Bluefin Tuna, Bigeye Tuna and Swordfish should be on such a list to export to Japan.⁴⁸

Across the 12 vessels, six mainly operated in the Pacific Ocean and Kiribati EEZ; the other six the Indian Ocean and Somali EEZ, according to AIS data. Busan in Korea was the most frequently used port for the fleet through direct port visits by those vessels operated in the Pacific and by carriers which the vessels trans-shipped with in the Indian Ocean. The fleet seldom visited ports through the investigated period, corresponding with crewmembers' testimonies of being isolated at sea for months.

Possible market access through port visits by XIN SHI JI fishing vessels

According to available AIS data and crewmembers' testimonies, four investigated XIN SHI JI vessels operating in the Pacific Ocean called at Busan port, Korea, to pick up crew, access port services and unload. The other six investigated XIN SHI JI vessels operating in the Indian Ocean, porting at Singapore as a middle stop and to pick up crew (see Table 5 below).

Table 5: Ports visited by the investigated XIN SHI JI vessels according to AIS

	Busan, Korea	Papeete, French Polynesia (France)	Suva, Fiji	Betio, Kiribati	Singapore	Victoria, Seychelles	Port Louis, Mauritius
XIN SHI JI B	Sep 2018 - Oct 2018 Nov 2020						
XIN SHI JI C	Mar 2019 Apr 2021	Sep 2019 Sep 2019 - Oct 2019		Jun 2019			
XIN SHI JI E	Jan 2018	Sep 2018					
XIN SHI JI G	Jan 2019 Jan 2021	Sep 2019					
XIN SHI JI L		Aug 2019 Feb 2020 - Mar 2020	Feb 2021				
XIN SHI JI D					Oct 2019 Jul 2021 - Aug 2021		
XIN SHI JI F					Oct 2019		
XIN SHI JI H					Aug 2020		
XIN SHI JI I					Aug 2020	May 2019	Sep 2019
XIN SHI JI J					Nov 2018	Nov 2019	
XIN SHI JI K					Nov 2018 Jun 2020 - Jul 2020		

Source: Global Fishing Watch (<https://globalfishingwatch.org/map>).

Note: XIN SHI JI A, XIN SHI JI B, XIN SHI JI C, XIN SHI JI E, XIN SHI JI G, XIN SHI JI L operated in the Pacific Oceans during the investigated period, while XIN SHI JI D, XIN SHI JI F, XIN SHI JI H, XIN SHI JI I, XIN SHI JI J, XIN SHI JI K operated in Somalia's EEZ and the Indian Ocean during the investigated period.

Possible market access through at-sea trans-shipment

Trans-shipment

New fishing and freezing technologies have allowed fishing fleets to conduct more efficient fishing operations and their network of supporting carrier vessels to operate at sea for longer periods of time without spoiling their catch. A consequence of this rapid growth in the sector is alarming declines in fish populations across the globe. As populations have become exhausted or species have become harder to find, fishing vessels have had to travel further from home in search of fish populations to target. As trips have become longer, trans-shipment – the mechanism of transferring catch to refrigerated cargo ships – has become an attractive means of reducing costs and allowing vessels to remain at sea.⁴⁹

As the practice of at-sea trans-shipment has become more enticing for industrial fleets, especially those targeting high-value species such as tuna, there have been growing concerns that these transfers are enabling both IUU fishing as well as labour and human rights abuses.⁵⁰ This is because transfers often take place hundreds or even thousands of kilometres from shore and far from appropriate oversight or control by authorities who might have otherwise detected illegal activity.

Although trans-shipment is often a legal practice, the opaque nature of at-sea transfers can enable illegally caught or undeclared seafood products from fishing vessels to be loaded onto carrier vessels already carrying legitimately caught seafood. This can allow vessel operators engaged in illegal activities to gain access to markets, as well as facilitate the continued abuse of crew through prolonged periods of time at sea. This is in contrast to in-port trans-shipment, which can generally be better regulated and monitored.⁵¹

An analysis of AIS data yielded suspected encounter events involving the vessels included in this alert and 11 carriers flagged to Panama, Korea and China during the investigated period. Among these, some events were corroborated by crew testimony, providing strong evidence that investigated vessels were involved in trans-shipments. However, there were some events reported by the crew with supporting photographic and video evidence that could not be detected by algorithms on satellite AIS platforms designed to identify vessel encounters due to a lack of AIS data at the relevant point in time - which may be as a result of one or both of the vessels involved having their AIS transponders switched off or signal issues. As explained in the Methodology section, due to such limitations, the analysis provided in the following sections might not present the full history or activities conducted by the identified vessels. Further investigation by the competent authorities and information recorded by the official vessel monitoring system are needed to verify these encounters. ZOF's prospectus includes a list of carriers trans-shipped with ZOF-owned vessels, which matches carriers identified in Table 6 below. It is worth noting that AIS data shows potential encounters between two XIN SHI JI vessels with FENG LU in 2020 but this is not included in the prospectus.⁵²

After encountering XIN SHI JI vessels, some carriers visited ports in Japan, Korea and Taiwan, indicating potential imports into these countries. The carrier list presented in Table 6 is provided as an indication of the potential scale of trans-shipment operations involving the XIN SHI JI fleet and does not imply that the carriers in question knowingly participated in or supported IUU fishing activities or human rights abuses.

Table 6: Details of potential trans-shipment events involving XIN SHI JI vessels, with carrier identification and destinations.

Carrier Name (IMO number)	Carrier flag (Current flag)	Owner/ operator of carrier (Owner Nationality) ⁵³	Encounters based on crew testimony and corroborated by AIS data	Encounters based on photographic evidence	Encounters only based on AIS data	Eventual destinations for the carrier				
						Shimizu, Japan	Busan, Korea	Kaohsiung, Taiwan	Chinese ports	Other Ports
SEIYU (9172909)	Korea	Green World Co Ltd (Korea)		XIN SHI JI K	XIN SHI JI D, XIN SHI JI F, XIN SHI JI I	Jan 27, 2020 - Feb 7 2020 May 8, 2020 - May 27, 2020	Jan 5, 2020 - Jan 8, 2020 Apr 4, 2020 - Apr 8, 2020 May 30, 2020 - Jun 2, 2020 Sep 8, 2020 - Sep 10, 2020	Sep 13, 2020 - Sep 15, 2020	Qingdao Jan 10, 2020 - Jan 14, 2020 Jan 15, 2020 - Jan 25, 2020 Feb 9, 2020 - Feb 11, 2020 Apr 9, 2020 - May 4, 2020 Aug 8, 2020 - Aug 21, 2020 Zhoushan Jun 4, 2020 - Jun 7, 2020 Tianjin Aug 22, 2020 - Aug 24, 2020 Dalian Aug 25, 2020 - Sep 2, 2020	
SEIBU (9684067)	Korea	Green World Co Ltd (Korea)	XIN SHI JI I	XIN SHI JI I, XIN SHI JI J			Sep 15, 2019 - Nov 9, 2019		Qingdao Nov 10, 2019 - Nov 13, 2019 Zhoushan Nov 15, 2019 - Nov 19, 2019	
SEIWA (9021277)	Korea (Russia) ⁵⁴	Green World Co Ltd (Korea)			XIN SHI JI I, XIN SHI JI J, XIN SHI JI K		Sep 19, 2019 - Oct 3, 2019		Zhoushan Aug 30, 2019 - Sep 4, 2019 Qingdao Sep 5, 2019 - Sep 12, 2019 Dalian Sep 13, 2019 - Sep 17, 2019	
SEI SHIN (8808161)	Korea	Green World Co Ltd (Korea)			XIN SHI JI F		Feb 8, 2021 - Feb 11, 2021		Zhoushan Jan 19, 2021 - Jan 28, 2021 Shidao Pt Jan 30, 2021 - Feb 7, 2021	
FUTAGAMI (9105293)	Panama	Wuhan Yidong Shipping Mgmt (China)			XIN SHI JI D, XIN SHI JI F	Jun 10, 2021 - Jun 17, 2021	Nov 24, 2021 - Nov 25, 2021	Jun 22, 2021 - Jun 24, 2021	Ningbo May 17, 2021 - May 22, 2021 Zhoushan May 21, 2021 - May 26, 2021 Weihai May 30, 2021 - Jun 7, 2021	Singapore Jun 30, 2021 - Jul 1, 2021

Carrier Name (IMO number)	Carrier flag (Current flag)	Owner/ operator of carrier (Owner Nationality) ⁵³	Encounters based on crew testimony and corroborated by AIS data	Encounters based on photographic evidence	Encounters only based on AIS data	Eventual destinations for the carrier				
						Shimizu, Japan	Busan, Korea	Kaohsiung, Taiwan	Chinese ports	Other Ports
YUN RUN 3 (9161613)	Panama (Nauru)	Fengrun Shipping Co Ltd (China)	XIN SHI JI A, XIN SHI JI B, XIN SHI JI G		XIN SHI JI C, XIN SHI JI E, XIN SHI JI L		Mar 22, 2019 - Mar 23, 2019 Aug 27, 2019 - Aug 28, 2019 Jul 8, 2020 - Jul 10, 2020 Oct 5, 2020 - Oct 6, 2020 Feb 5, 2021 - Feb 7, 2021	Jul 18, 2018 - Jul 21, 2018 Dec 19, 2018 - Dec 21, 2018 Feb 10, 2021 - Feb 11, 2021	Zhoushan Jun 30, 2018 - Jul 15, 2018 Nov 12, 2018 - Dec 10, 2018 Mar 26, 2019 - Apr 25, 2019 Jul 24, 2019 - Aug 26, 2019 May 29, 2020 - Jul 6, 2020 Oct 8, 2020 - Oct 10, 2020 Jan 9, 2021 - Feb 3, 2021 Ningbo May 3, 2020 - May 15, 2020 Sep 23, 2020 - Oct 2, 2020 Qingdao May 18, 2020 - May 25, 2020	Papeete, French Polynesia Oct 6, 2018 - Oct 7, 2018 Jun 13, 2019 - Jun 14, 2019 Nov 2, 2019 - Nov 6, 2019 Nov 25, 2019 - Nov 26, 2019
FENG LU (9003158)	Panama	Owned by Runze L (China) and operated by Tillage Sea Pte Ltd			XIN SHI JI D, XIN SHI JI F					Port Louis, Mauritius Oct 20, 2020 - Oct 29, 2020 Cape Town, South Africa Nov 5, 2020 - Nov 7, 2020
PING TAI RONG LENG 2 (9839363)	China	Pingtairong Ocean Fishery (China)			XIN SHI JI C, XIN SHI JI L		Dec 6, 2019 - Dec 7, 2019		Zhoushan Nov 3, 2019 - Dec 4, 2019 Mar 19, 2020 - Apr 25, 2020	Puapuaotu Tapere, Cook Island Aug 16, 2019 - Aug 17, 2019
HENG HONG 5 (9946283)	China	Zhejiang Henghong Shipping (China)			XIN SHI JI C		Jul 3, 2022 - Jul 4, 2022 Sep 22, 2022 - Sep 22, 2022 Oct 20, 2022 - Oct 20, 2022		Zhoushan 30 May, 2022 - 1 Jul, 2022 Sep 24, 2022 - Oct 16, 2022	
ANGARA (9136890)	Panama	Owned by Yustat Group Ltd (Malta) and operated by Alpha Reefer Transport GmbH			XIN SHI JI G, XIN SHI JI L		Dec 26, 2020 - Dec 28, 2020		Zhoushan Dec 14, 2020 - Dec 24, 2020	
SHIN HO CHUN NO.101 (9220653)	Panama	Tunago Shipping Co Ltd (Taiwan)			XIN SHI JI L					Levuka, Fiji Aug 12, 2020 - Sep 9, 2020 Suva, Fiji Sep 9, 2020 - Sep 12, 2020

Table 7: Details of encounter events involving XIN SHI JI vessels at sea between January 2018 and September 2022, according to available AIS data.

Vessel name	Carrier name and encounter time
XIN SHI JI A	YUN RUN 3 – Jul 2019
XIN SHI JI B	YUN RUN 3 – Jul 2019, Sep 2019
XIN SHI JI C	YUN RUN 3 – May 2019, Sep 2019, Feb 2020, Aug 2020, Nov 2020 PING TAI RONG LENG 2 – Jul 2019 HENG HONG 5 – Mar 2022, May 2022, Aug 2022
XIN SHI JI D	SEIYU – Jul 2020 FENG LU – Sep 2020 FUTAGAMI* – Mar 2021
XIN SHI JI E	YUN RUN 3 – May 2018, Aug 2018, Jan 2019, May 2019, Sep 2019
XIN SHI JI F	SEIYU – Jul 2020 FENG LU* – Sep 2020 SEISHIN* – Dec 2020 FUTAGAMI* – Mar 2021
XIN SHI JI G	YUN RUN 3 – May 2019, Sep 2019, Aug 2020 ANGARA – Sep 2020
XIN SHI JI I	SEIWA – Jul 2019 SEIYU – Mar 2020
XIN SHI JI J	SEIWA – Jul 2019
XIN SHI JI K	SEIWA – Jul 2019
XIN SHI JI L	YUN RUN 3 – Jun 2019, Oct 2019, Aug 2020*, Aug 2020 PING TAI RONG LENG 2 – Feb 2020 SHIN HO CHUN NO.101 – Jun 2020 ANGARA – Oct 2020

Source: Encounter information labelled with a '*' is provided by Starboard (<https://app.starboard.nz/>), and all other information is provided by Global Fishing Watch (<https://globalfishingwatch.org/map>). For two or more encounters happening close to one another, we consider that these could be counted as one encounter and potentially a trans-shipment.



The photo provided by EJF's source from XIN SHI JI I, shows the vessel trans-shipping with the carrier SEIBU (9684067). The encounter is not found on the AIS data platforms (Global Fishing Watch and Starboard) - potentially because one or both vessels did not have their AIS transponders switched on.



The photo provided by EJF's source from XIN SHI JI J, shows the vessel trans-shipping with the carrier SEIBU (9684067). The encounter is not found on the AIS data platforms (Global Fishing Watch and Starboard) - potentially because one or both vessels did not have their AIS transponders switched on.



This is a screenshot of the video provided by EJJ's source from XIN SHI JI K. The video shows the vessel trans-shipped with the carrier SEIYU (9172909, Callsign: D8DK), but this encounter is not found on the AIS data platforms (Global Fishing Watch and Starboard) - potentially because one or both vessels did not have their AIS transponders switched on.

Links with market states through trade

ZOF's prospectus listed some of their top buyers between 2018 and 2021, as well as the major partners both buying from and supplying to ZOF.⁵⁵ EJJ discovered additional ZOF trade partners on Panjiva, a shipment record database. It should be noted that due to the opacity of the fishing industry and the global trade in seafood, it is currently not possible to trace the origin of the products purchased by ZOF's business partners back to particular vessels that were reported to be involved in IUU fishing and/or human rights abuses. The purpose of this analysis is to present the scale of exploitation and the risks posed to the global seafood supply chain.

According to ZOF's prospectus, frozen tuna was sold to Fong Chun Formosa Fishery Company (FCF) Co, Ltd and Tri Marine International (PTE), LTD for the canning process, and tuna destined for the Japanese market was mostly purchased by the Mitsubishi Corporation. Between 2018 and 2021, ZOF sold approximately US\$305.7 million worth of fresh and processed tuna products to FCF, the Taiwanese seafood conglomerate.⁵⁶ These sales account for around 5% of all FCF's annual purchases in these four years.⁵⁷ The Japanese multinational, the Mitsubishi Corporation, purchased approximately US\$179.7 million worth of tuna from ZOF in the same period.⁵⁸ The two companies were the top two trading partners of the 'sales through traders' model with ZOF across these years.

Table 8: ZOF's sales to FCF Co, Ltd (Taiwan) and Mitsubishi Corporation (Japan).

Sale to major clients (USD Thousand) and percentage of ZOF's revenue	2018	2019	2020	2021	SUM
FCF Co, Ltd (Taiwan)	109,005.1 (23.92%)	76,079.2 (17.21%)	78,464.9 (17.09%)	42,138.4 (7.64%)	305,687.5
Mitsubishi Corporation (Japan)	45,994.4 (10.09%)	49,862.9 (11.28%)	43,031.4 (9.37%)	40,839.9 (7.41%)	179,728.7

FCF is not only the largest buyer of ZOF's tuna but also the largest fuelling service supplier for ZOF. From 2018 to 2021, FCF supplied ZOF with more than 72% of its fuel every year. ZOF purchased approximately US\$52.5 million worth of fuel from FCF in this period.⁵⁹

Apart from being one of the largest tuna traders in the world, FCF also owns the US-registered company Bumble Bee Foods. From January 2018 to September 2022, ZOF shipped an estimated 3,821 tonnes of frozen precooked Skipjack and Albacore tuna to Bumble Bee Foods, according to US customs data.⁶⁰ Bumble Bee Foods is a major canned tuna supplier to retailers such as Walmart,⁶¹ Amazon⁶² and Target.⁶³ ZOF also supplied over 4,563 tonnes of tuna to a leading⁶⁴ Mexican food processing company, Pescados Industrializados SA Cv, in the same period.⁶⁵ In that period, Pescados Industrializados supplied Nestlé Purina Petcare in the US with 'tuna waste' (desperdicios de atún, tuna that is left over from human consumption).⁶⁶ Nestlé Purina Petcare is the pet food production subsidiary of multinational food giant Nestlé.⁶⁷

ZOF also exports precooked tuna loins through its subsidiary food entities – Ningbo Today Food Co. Ltd. (宁波今日食品有限公司) and Ningbo Fengsheng Foods Co. Ltd. (宁波丰盛食品有限公司), and its processing partner Ningbo Yifeng Foods Co. Ltd. (宁波亿丰食品有限公司). The former two companies are also major suppliers of Pescados Industrializados.⁶⁸

Ningbo Today Food, majorly owned by ZOF (55%) until November 2021 before ZOF sold the shares,⁶⁹ supplied tuna to Bumble Bee Foods.⁷⁰ The tuna processor, exporter and ZOF subsidiary Ningbo Fengsheng Foods Co. Ltd supplies markets in North and South America, and South and Southeast Asia,⁷¹ according to customs data. Ningbo Yifeng Foods Co., Ltd., a long-time outsourcing tuna processor of ZOF, processed 6,865.29 tonnes of tuna for ZOF in 2018.⁷² ZOF stated in its prospectus that the company shipped its tuna to the USA after processing.⁷³ Ningbo Yifeng Foods Co., Ltd. shipped 1,538 tonnes of tuna to Bumble Bee in 2018.⁷⁴



A XIN SHI JI vessel in operation.

ZOF's other major international clients disclosed in the prospectus include Maruha Nichiro Corporation and UOICHI Co., Ltd., Hiroichi Co. (Japanese trading companies), SNB International Co., Ltd. (a Korean tuna processor), Tri Marine International (PTE), LTD (part of the Tri Marine Group, a subsidiary of the Italian group, Bolton, based in Singapore) and Kibu Pte. Ltd. (part of the Spanish company Grupo Frinsa, based in Singapore), Jealsa Rianxeira S.A.U. and Hijos de Carlos Albo S.L.U (Spanish cannery manufacturers) and SMU S.A. (a Chilean food retailer).

Since ZOF only discloses the revenues of the top five buyers in sales each year, the exact trading value and quantities for each year are not completely revealed. The buyers mentioned are therefore not an exhaustive list but rather simply those with the largest volume of purchases. However, this limited information still reveals the scale of ZOF's trade internationally.

Maruha Nichiro Corporation, the world's largest seafood company by revenue⁷⁵ with a global network of processing and trading in 70 countries,⁷⁶ purchased approximately US\$2.1 million worth of squid and frozen processed tuna between 2018 and 2021 from ZOF.⁷⁷ The company has a strong presence in the Japanese market,⁷⁸ with its products sold in major Japanese retailers, including Rakuten⁷⁹ and Amazon.⁸⁰ Another Japanese seafood trader, UOICHI Co., Ltd., bought US\$1.35 million worth of frozen processed tuna from 2020 to 2021. ZOF also bought frozen fresh fish from both companies.⁸¹ Hiroichi Co., Ltd., a Japanese tuna importer and trader located in Shimizu,⁸² purchased approximately US\$3.4 million worth of frozen tuna from ZOF from 2019 to 2021.⁸³ The company is owned by the Taiwanese fishery company, OCEAN TREASURE Co., Ltd.⁸⁴

From 2018 to 2021, SNB International Co., Ltd., a Korean tuna processor, bought approximately US\$11 million worth of frozen tuna from ZOF.

Tri Marine Group is a US-based subsidiary⁸⁵ of the global conglomerate, the Bolton Group, which is headquartered in Italy.⁸⁶ Tri Marine is the owner of brands including Ocean Naturals,⁸⁷ which can be purchased through major retailers in the US, including Walmart⁸⁸ and Amazon.⁸⁹ The ZOF prospectus lists a subsidiary of Tri Marine in Singapore, Tri Marine International (PTE), LTD, as a recipient of tuna, purchasing approximately US\$54 million worth of tuna in total from 2018 to 2021.

Kibu Pte. Ltd. bought approximately US\$26.1 million worth of tuna in total in 2020 and 2021 from ZOF. Kibu is part of the Spanish-headquartered Grupo Frinsa,⁹⁰ which describes itself as ‘one of the largest European manufacturers of canned tuna and shellfish.’⁹¹ Kibu is established as the group’s foothold in Asia for better access to fishing grounds and processing facilities.⁹² However, trade records show that it has a global trade footprint, having, for example, exported tuna to Mexico in 2023.⁹³ However, no information exists on whether its products are distributed to the broader Frinsa group. The group owns brands including Frinsa La Conservera, Frinsa Proteína Natural, Ribeira, Seaside and The Nice Fisherman. These brands have appeared on UK supermarket shelves, including Iceland⁹⁴ and Marks and Spencer.⁹⁵ It also produces canned fish and seafood for major European retailers Carrefour, Alcampo, Lidl and El Corte Inglés.⁹⁶

In 2019, Jealsa Rianxeira S.A.U., a Spanish fishing and cannery company, purchased approximately US\$4.6 million worth of tuna from ZOF. The company owns brands selling across many different countries: Rianxeira and Escurís in Spain,⁹⁷ Mare Aperto in Italy,⁹⁸ Robinson Crusoe in 22 Central, North and South American countries, including Chile and Brazil,⁹⁹ and Soluco la Mer¹⁰⁰ and Chancerelle Frères¹⁰¹ in France.

Another Spanish cannery producer, Hijos de Carlos Albo S.L.U, bought approximately US\$12.1 million worth of frozen and processed tuna from ZOF between 2018 to 2021.¹⁰² The company owns the brand ALBO,¹⁰³ which supplies its products to large retailers, including Spanish supermarket Eroski¹⁰⁴ and Carrefour (Spain).¹⁰⁵ Hijos de Carlos Albo S.L.U has been wholly owned by Shanghai Kaichuang Deep Sea Fisheries Co., Ltd. (上海开创国际海洋资源股份有限公司) since June 2016,¹⁰⁶ and ultimately owned by Bright Food (Group) Co., Ltd. (光明食品(集团)有限公司).¹⁰⁷ Bright Food (Group) Co., Ltd. is wholly controlled by the Shanghai Municipal Government via State-owned Assets Supervision and Administration Commission Of Shanghai Municipal Government, Shanghai Municipal Investment Group and Shanghai Guosheng Group Co., Ltd..¹⁰⁸

SMU S.A. is the third-largest supermarket chain in Chile.¹⁰⁹ It started buying canned tuna made by Ningbo Today Food Co. Ltd. in 2019. After ZOF sold its shares in Ningbo Today Food Co. Ltd. in November 2021, these sales are no longer disclosed in the prospectus. The total amount of tuna sold to SMU S.A. before November 2021 is approximately US\$1.3 million.

Table 9: Summary of companies linked to ZOF through trade

Companies bought from ZOF	The company’s/group’s brands (if applicable)	Retailers selling these brands (if applicable)
Maruha Nichiro Corporation	Maruha Nichiro	Rakuten, Amazon
UOICHI Co.		
Hiroichi Co.		
SNB International Co., Ltd.		
Tri Marine International (PTE), LTD (Tri Marine Group)	Ocean Naturals	Walmart, Amazon
Kibu Pte. Ltd. (Grupo Frinsa)	The Nice Fisherman	Iceland
	Frinsa La Conservera	Marks and Spencer
	Frinsa Proteína Natural, Ribeira, Seaside	
	Canned fish and seafood with retailers’ brands	Carrefour, Alcampo, Lidl, El Corte Inglés
Jealsa Rianxeira S.A.U.	Rianxeira, Escurís, Mare Aperto, Robinson, Soluco la Mer, Chancerelle Frères	
Hijos de Carlos Albo S.L.U	ALBO	Eroski, Carrefour
SMU S.A.		

Failures to detect and deter trade of illegal and unethical seafood

The reported IUU fishing and human rights abuses, and the scale of ZOF's presence in the global seafood market, show the pressing need for the world's seafood supply chain to improve monitoring, transparency and traceability. Without knowing the true origin and catch methods of their seafood, consumers around the world are at risk of unknowingly purchasing products linked to environmentally destructive practices and human rights abuses. Often, consumers rely on labels, certificates or accreditations to tell if a product has been produced ethically and sustainably. ZOF and Ningbo Today Food are both “dolphin safe companies”, approved by the International Marine Mammal Project (IMMP),^{110,111} and were granted the right to use its “dolphin safe” label on their products. The label can only be used for tuna caught without any dolphin mortality.¹¹² However, EJJ's investigations strongly suggest that some XIN SHI JI vessels engage in the intentional killing of dolphins. Moreover, the above-mentioned food companies that process ZOF's tuna catch – Ningbo Fengsheng Food,¹¹³ Ningbo Today Food¹¹⁴ and Ningbo Yifeng Foods¹¹⁵ – are all certified by the Marine Stewardship Council (MSC) for the sale of albacore, bigeye, skipjack and yellowfin tuna. EJJ's evidence has shown that ZOF and its fleet could have violated the requirements of these approvals and certifications on multiple occasions. There is no suggestion that the MSC or the IMMP are aware of these incidents.



Figure 3: A ZOF own-branded can of tuna with IMMP's dolphin safe icon (red circle at bottom left)¹¹⁶

Conclusion and Recommendations

This briefing presented the potentially systematic scale of exploitation, human rights abuses and intentional wildlife killing conducted by the ZOF fleet, and the fleet's links to the global market. The findings also show a worrying lack of monitoring from state governments and insufficient traceability of the global seafood supply chain to avoid trading and consuming products associated with such abuses. While at-sea monitoring by the Chinese government is the first step to ensure vessels comply with national and international regulations, port inspections and import controls from port states and market states are also critical to deter and detain seafood associated with illegal and unethical activities.

Transparency is an immediately available and economically feasible tool to facilitate law enforcement and enable meaningful due diligence throughout the entire seafood supply chain from flag state to end buyers. EJF urges all state governments to support the Global Charter for Fisheries Transparency and to strive to align domestic policy with the 10 principles listed in the Charter.¹¹⁷ To achieve this, EJF recommends that:

The Government of the People's Republic of China:

- Investigate the alleged illegal practices and trans-shipments conducted by ZOF and Zhoushan Pacific Tuna Pelagic Fishery, and if confirmed, sanction the vessels' beneficial owners, captains and any relevant personnel for the violations.
- Publish real-time, well-organised and up-to-date lists of authorised vessels in detail include the authorised period, area, target species, charter information sanction history (if any), and beneficial owners.
- 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, implement and enforce the International Labour Organisation Work in Fishing Convention C188 to address issues around human rights abuses onboard the Chinese fleet.

The Governments of Taiwan, Korea, Japan and France:

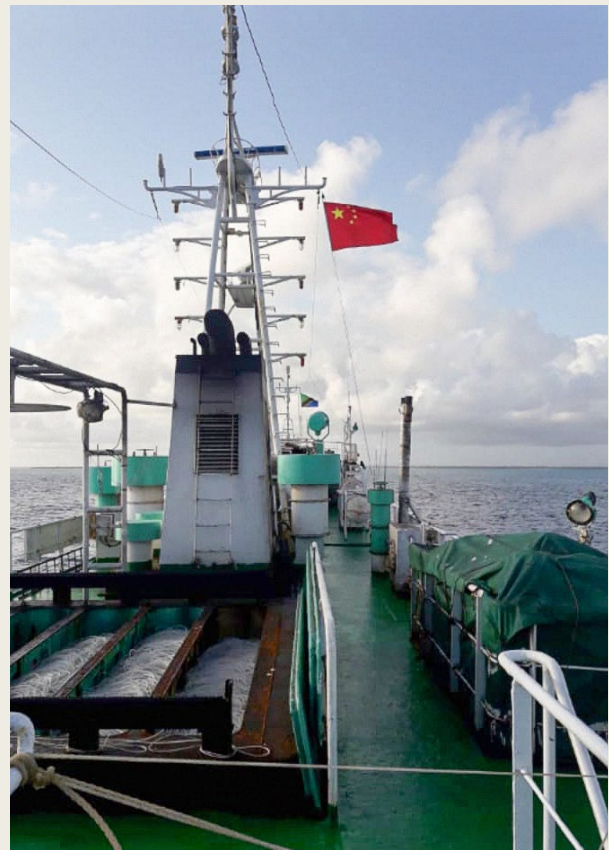
- Effectively implement the FAO Agreement on Port State Measures.
- List the vessels identified in this report and all the sister vessels belonging to the same fishing companies as high risk vessels and subject to careful port inspection for their fishing practices and human rights abuses when the vessels enter their ports. (Please find the full list in the section 'Reports of IUU fishing and human and workers' rights violations.')
- Where a port state has reasonable grounds to believe that a vessel named in this report or any vessel seeking entry into one of its ports has engaged in IUU fishing, that state should deny that vessel port entry or allow entry exclusively for the purpose of inspecting it. Port states should also alert others about the request of such vessels for port access.
- Should such a vessel be found in a port, deny it the use of the port for landing, trans-shipping, packaging, and processing of fish and for other port services including but not limited to refuelling, resupplying, maintenance and drydocking.
- When conducting port inspections on human rights abuses, ensure a victim-centred approach and provide all necessary protections for the victims of human trafficking and/or forced labour.

Policymakers and Governments of the EU, USA, Japan and Korea:

- Investigate all imports from the fishing vessels identified in this report. Should illegal activities be found in associated supply chains, request the sellers to remove the products from their supply chains.
- Reinforce import control mechanisms and strive to align them to remove loopholes, provide clarity, and enable information exchange, legal trade facilitation and interoperability.
- Increase scrutiny over imports of fisheries products originating from vessels suspected of IUU fishing or human rights abuses through standardised checks, verifications and inspection procedures in accordance with risk criteria.
- Consider the information contained in this notification in the context of the various cooperation forums it has established with the relevant other countries mentioned and other relevant mechanisms (such as those under Council Regulation (EC) No. 1005/2008 and relevant bilateral dialogues on fisheries, human rights and labour for the European Union).

Global seafood buyers:

- Review any trade with the companies and vessels identified in this briefing and collaborate with the relevant authorities to confirm the legality of these products. If any are confirmed to be illegally sourced, immediately call back all the products and stop trade with the company and these vessels.
- Improve traceability of seafood products and request that suppliers provide all necessary information that can help to trace back to the origin of the fish. Make such information publicly available to consumers.
- Develop meaningful due diligence that can effectively identify seafood products associated with illegal fishing and human rights abuses. Once identified, immediately stop sourcing from the suppliers and call back all the products.
- Join civil society and support the Global Charter for Fisheries Transparency. Request the relevant authorities improve import control regulations so seafood products associated with high risk activities can be stopped at the border without entering the supply chain.



A XIN SHI JI vessel.

- 1 Zhejiang Ocean Family Co., Ltd. (2023) The initial public offering (IPO) and listing on the main board prospectus of Zhejiang Ocean Family Co., Ltd. (大洋世家(浙江)股份公司首次公开发行股票并在主板上市招股说明书), https://pdf.dcfw.com/pdf/H2_AN202303031584027760_1.pdf?1677884026000.pdf
- 2 Seafood Source, Ocean Family Cancels IPO As Chinese Market Continues to Sink Under Gloomy Outlook, accessed 7.9.2023. Available at: <https://www.seafoodsource.com/news/premium/business-finance/ocean-family-cancels-ipo-as-chinese-market-continues-to-sink-under-gloomy-outlook>
- 3 Zhejiang Ocean Family Co., Ltd. (2023) op cit.
- 4 Zhejiang Ocean Family Co., Ltd. (2021) The prospectus for initial public offerings (IPO) of Zhejiang Ocean Family Co., Ltd. (浙江大洋世家股份有限公司首次公开发行股票招股说明书), https://pdf.dcfw.com/pdf/H2_AN202112171535113467_1.pdf?1648334018000.pdf
- 5 Zhejiang Ocean Family Co., Ltd. (2023) op cit.
- 6 Panjiva, accessed 2022, <https://panjiva.com/>
- 7 Zhejiang Ocean Family Co., Ltd. op cit.
- 8 An 'encounter' is detected via algorithm when two vessels who are transmitting AIS signals are in close proximity for a sustained period of time, over 10km from a coastal anchorage and travelling at speeds low enough that the transfer of goods, people or cargo between the vessels would be possible. It should be noted that where an encounter is detected between vessels it is not necessarily proof of a trans-shipment of fish between them, and can only be considered as behaviour indicative of trans-shipment pending verification through additional evidence. For the specific encounter parameters for each platform, see: GFW (<https://globalfishingwatch.org/faqs/what-is-a-vessel-encounter/>) and Starboard (<https://help.starboard.nz/en/articles/5587275-how-are-vessel-encounters-identified>) definitions.
- 9 Zhejiang Ocean Family Co., Ltd. op cit.
- 10 新华网, 24.2.2023, '中华人民共和国第十四届全国人民代表大会代表名单', accessed 9.5.2023, http://www.news.cn/politics/2023-02/25/c_1129395721.htm
- 11 China Enterprise Confederation/ China Enterprise Directors Association, '副会长名单', accessed 9.5.2023, http://www.ceci979.org.cn/view_nbqyis.php?sid=27
- 12 All-China Federation of Industry and Commerce, '工商联领导', accessed 9.5.2023, <http://www.acfic.org.cn/bhjj/ldzc/zxfzx/>
- 13 Zhejiang Ocean Family Co., Ltd. (2023) op cit.
- 14 *ibid.*
- 15 According to the prospectus, the other 10% are owned by an investment company, Ocean Investment (大洋投资), with Wanxiang Sannong Group owning 99% of its shares and Lu Weiding holding the remaining 1%.
- 16 万向信托股份公司 2022 年度报告 (2022 Wanxiang Trust Annual Report) (2023) <https://www.wxtrust.com/upload/2023/04/28/16826763265882tq7e6.pdf>
- 17 WCPFC, 'WCPFC Record of Fishing Vessels', accessed 14.6.2023, <https://vessels.wcpfc.int/browse-rfv>
- 18 Zhejiang Ocean Family Co., Ltd. op cit.
- 19 Ministry of Finance, Ministry of Communications, Ministry of Agriculture and Rural Affairs and State Forestry Administration of the People's Republic of China (2016) 关于调整农村客运、出租车、远洋渔业、林业等行业 油价补贴政策的通知, <https://web.archive.org/web/20230823073741/http://app.www.gov.cn/govdata/gov/201605/11/380310/article.html>
- 20 Ministry of Agriculture and Rural Affairs of the People's Republic of China (2016) 农业部办公厅关于印发远洋渔业油价补贴政策调整实施方案的通知, <https://web.archive.org/web/20230823073959/http://www.weiha.gov.cn/module/download/downloadfile.jsp?classid=0&filename=0c2793187c384f4eb93db5d7dd320oof.pdf>
- 21 *ibid.*
- 22 *ibid.*
- 23 The law was introduced in 1988 and amended in 2004, 2009, 2016, 2018 and 2022. It prohibits catching and killing of 'National key protected wild animals (国家重点保护野生动物)' including False Killer Whales and 16 species of cetaceans.
- 24 EJF investigators are equipped with an animal identification guide, which is provided to each interviewee. This identification guide provides photos of common shark species and charismatic species alongside the species name in Bahasa, thus allowing fishers to point out species that they may have encountered during their time on board the fishing vessel.
- 25 Environment & Animal Society Taiwan (2020) Mega-Threat: Saving the Megamouth Shark, <https://www.east.org.tw/sites/east/files/content/file/2020-ISSUES/20200707-1.pdf>
- 26 IUCN (2019) Megamouth Shark, <https://www.iucnredlist.org/species/39338/124402302>
- 27 IUCN (2018) False Killer Whale, <https://www.iucnredlist.org/species/18596/145357488>
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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 software such as Global Fishing Watch and Starboard, which allow the observation of vessels equipped with an Automatic Identification System (AIS).

Environmental Justice Foundation (EJF)

Gensurco House, 3-5 Spafield Street, London, EC1R 4QB, UK

Tel: +44(0) 207 239 3310, info@ejfoundation.org, www.ejfoundation.org

