THE TUNA'S BLACK BOX

Knowns, Unknowns
and Discrepancies in
the Tuna Trade.



BLOOM AFRICA

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THREE PAGES SUMMARY

Tuna is France's favorite fish.[1] It is also the source of the world's largest fishing industry, with sales of over 40 billion dollars a year.[2] Yet, tuna fishing and the canned tuna industry is a real black hole, the eye of which is the Seychelles' archipelago, a notorious tax haven. Despite substantial public funding for European vessels, which dominate the Indian Ocean tuna fishery, no traceability is required for fishing vessels, from catch to export. As a result, a staggering volume of fish — the real figure of which is unknown to anyone other than the industry — disappears down a statistical hole, and is trafficked beyond the control of the Seychellois and European authorities. Behind every can of tuna lies a potential abyss of tax avoidance, regulatory circumvention, illegal fishing, overfishing, fraud and destructive practices, both for the ocean and for human beings. A closer look at the European tuna industry, which has broken free from common rules and customs duties in particular (which amount to 0% towards Europe!) is staggering. In the first quarter of the 21st century, at a time when the ocean is on its last legs, one of the world's largest fisheries can still operate on such opaque terms and yet be allowed to reach our markets.

The 'Tuna's Black Box' report invites us to look through the mirror of canned tuna marketing that saturates our supermarket shelves, to discover the unacceptable systems devised by, and for, industrial fishing companies and supermarkets.

1 FranceAgriMer (2022) Chiffres-clés des filières pêche et aquaculture en France en 2022.

2 The Pew Charitable Trusts (2020) Netting billions 2020: a global tuna valuation.

The European Union is the undisputed leader of this lucrative industry, with 39 of the world's 50 largest registered tuna vessels belonging to European companies (including the eight largest vessels).

Since 2020, this European tuna fleet has comprised around fifty vessels registered in France and Spain, mainly active in the western Indian Ocean,[3] and to a lesser extent in the Atlantic Ocean. Exploitation of the latter began as early as 1964 with the arrival of the first Spanish tuna seiners in the Gulf of Guinea, before gradually extending to the Indian Ocean in the early 1980s,[4] notably through a solid presence in the Seychelles, facilitated by abundant public funding.

The Seychelles soon became the nerve center of tropical tuna fishing for the European Union: most of its fleet is based there full-time and supplies the world's second largest tuna canning plant almost exclusively (the IOT plant in Victoria, now owned by Thai giant Thai Union). In return, this plant supplies a large part of the European market, thanks particularly to an agreement setting customs duties at 0%.

But where exactly does the tuna consumed on the European market come from? In an attempt to answer this (largely unanswered) question, we set out to understand the precise path from catch to plate and delved into the intricacies of the sector. We can now reveal the extent to which this fishery and the ensuing exchanges — landing, transshipment, processing, export, etc. — are completely uncontrolled, leaving room for all manner of data manipulation, thereby generating a vast quantity of unreported statistics. The main findings of this report are summarized below:

→ Almost all European catches in the Indian Ocean pass through the Seychelles. Some are processed on site, but most is then transshipped[5] to destinations around the world;

→ Local authorities have no control over this transshipped tuna: statistics are purely declaratory and are not monitored in any way;

→ An overwhelming proportion of the tuna traded in the Seychelles is not included in international trade statistics;

→ European manufacturers themselves admit they do not know exactly what they are catching, and are guilty of misreporting;

→ The situation of Indian Ocean tuna, seriously threatened by overfishing, is a direct consequence of the opacity and lack of traceability of the European industry.

3 A handful of Spanish vessels are also present in the Pacific Ocean, but their fishing is minimal. The companies owning all these European-registered vessels also own 46 other purse seiners registered in non-European countries: European shipowners own 100% of the large purse seiners listed in Curacao (3), El Salvador (6), Guatemala (2), Mauritius (4), the Seychelles (12) and Tanzania (1), as well as part of the fleet in Oman (1, or 50%), Belize (3, or 30%), Ecuador (8, or 9%) and Panama (7, or 29%). They operate worldwide, both on the high seas and in the exclusive economic zones (EEZs) of a number of countries, thanks to a network of fishing agreements, including the heavily subsidized ones negotiated by the European Commission for its fleet. There are also a number of 'support vessels', which do not fish, but whose role is to transport and deploy FADs to increase the fishing capacity of fishing vessels.

4 Carmona (2022) Changes in the Spanish fish-canning industry since Spain's entry to the European Union.

5 The cargo is loaded onto a container ship and sent to another destination (Mauritius, Ecuador, etc.).

In the coming weeks or months, the European Union could allow the European tuna industry to benefit from a spectacular weakening of the measures that are required to report catches, by considering the port of the Seychelles as able to guarantee a solid statistical monitoring of catches. Our revelations call into question the unconditional support of the European Commission and the French and Spanish States for their tuna industry.

THAILAND, A POWERFUL PLAYER IN THE TUNA SECTOR, SEEKS THE FAVOR OF THE EUROPEAN UNION

On a global scale, the number one player in tuna canning is Thailand: in 2021, almost 35% of global imports of frozen skipjack and yellowfin tuna were destined for Thailand for local canning. Despite this important position, Thai canned products are not yet really present on the European market, as customs duties currently stand at 24%, making them highly uncompetitive compared with cans from the Seychelles (manufactured in a factory owned by...the Thai giant Thai Union!), which benefit from a 0% customs agreement.

Yet, this trade disadvantage could very soon disappear, as a similar agreement to the one with the Seychelles is currently being negotiated, and industry players seem very confident about its future.[6] This gift from the European Union to Thailand would certainly not be isolated from Thailand's support for Europe's destructive policy in the Indian Ocean, with Thailand having solidly backed the European industry by objecting to the Indian Ocean Tuna Commission Resolution 23/02, which aimed to ban fish aggregating devices (FADs) — used primarily by Europeans — for 72 days a year.[7]

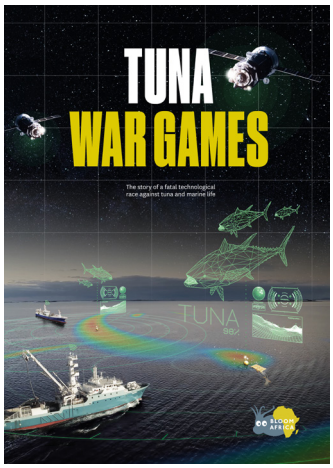
6 UndercurrentNews (2023) Thailand's tuna industry brimming with cautious optimism as EU FTA talks resume.

7 IOTC (2023) IOTC circular 2023-48 — Objection from Thailand to IOTC resolution 23/02.

THE EUROPEAN TUNA FLEET: A MAJOR FISHING POWER IN THE INDIAN OCEAN

The European Union is a major player in tropical tuna fishing, which supplies the market for cans of tuna from Saupiquet, Petit Navire and other brands.

This fishery mainly targets two species, skipjack tuna (*Katsuwonus pelamis*) and yellowfin tuna (*Thunnus albacares*),[8] using huge fishing vessels known as 'purse seiners'. These species are the most widely consumed fish in Europe, including[9] in France, where their annual consumption reaches 4 kg per capita.[10]



→ Read the report at https://bloomassociation.org/wp-content/uploads/2023/04/tuna-war-games.pdf

A **'seiner'** is a vessel that uses a fishing gear known as a 'purse seine', i.e. a vertical net over 1 km long and up to 300 m high, deployed around schools of tuna previously detected by sonar[11] with the help of a small support vessel. At the end of the encirclement, the net is closed at the bottom with a sliding cable to prevent the fish escaping through the bottom. The animals are then trapped and have no chance of escaping. The closed net is then progressively reduced to allow the fish to be transferred to the fishing vessel using a large landing net known as a 'brail' or 'dip net' ('salabarde' in French). As well as being highly efficient — up to 100 tonnes of fish can be hauled up during each operation —[12] this fishing method has even more harmful consequences when combined with the use of fish aggregating devices (FADs), which now account for almost all European catches in the Indian Ocean.

These vessels are monsters of steel and technology, with an average length of 83 meters and up to 116 meters for the largest, the ALBATUN DOS, which is owned by Spanish shipowner Albacora (the biggest player in European tuna fishing). They catch 200,000-300,000 tonnes of tuna each year in the Indian Ocean alone.

8 A third species, bigeye tuna, also known as 'patudo' (*Thunnus obesus*), is caught by the same vessels, but accounts for only a small proportion of catches, around 5%.
9 Eumofa (2022) Le marché européen du poisson — Edition 2022.
10 FranceAgriMer (2022) Chiffres-clés des filières pêche et aquaculture en France en 2022.
11 Ifremer (2024) Les sennes tournantes et coulissantes.
12 IOTC (2023) A recent overview of the large-scale purse seine fishery operating in the Indian ocean with drifting fish aggregating devices.

Officially, according to statistics produced by the Food and Agriculture Organization of the United Nations (FAO),[13] Spain was the world's fifth-largest fishing power in terms of catches of these tuna species in 2021, with France in sixteenth place. But these figures are misleading, as European tuna fishing companies are masters in the art of 're-flagging', i.e. registering a French- or Spanish-owned vessel in another country, usually a tax haven with far less stringent control rules, such as the Seychelles.

We will now focus on the Indian Ocean, where two out of every three European tropical tuna catches are made. The real weight of industrial interests here is much greater than official figures would have us believe. According to data from the Indian Ocean Tuna Commission (IOTC), France and Spain operate 28 vessels, but all the purse seiners registered in the Seychelles, Mauritius, Tanzania and Oman — a further 20 vessels — are in fact also owned by the same Spanish and French fishing companies. The combined catches of these 48 vessels represent more than half of the catches made by industrial vessels.[14] This undeniably gives the EU a dominant status in Indian Ocean tuna fisheries, and in the way they are (very poorly) managed: of the three tuna species targeted there, two are currently considered overfished (yellowfin tuna[15] and bigeye tuna[16]); the third (skipjack) being fished at unprecedented levels, and well beyond scientific advisory limits.[17]

AN INDUSTRY THAT WOULD NOT EXIST WITHOUT PUBLIC SUBSIDIES

The European Union has encouraged the creation of joint ventures and fishing agreements in African waters to reduce excess capacity in its own waters.[18] These agreements are particularly important for the tropical tuna fleet, especially in the Indian Ocean, where they can operate freely thanks to access rights paid for by European taxpayers. Thus, if a large proportion of their catches come from the High Seas (85% in 2021),[19] for example between the Seychelles and Somalia, it is because the European Union pays for their access to the waters of the Seychelles, Madagascar and elsewhere; if they had to pay for access to these waters themselves, their business model would collapse.

In addition to access to these waters, these agreements have also enabled the development of Victoria's industrial port,[20] thanks to European subsidies intended as 'sectoral support' for local fishers. These large-scale works are of no benefit to local fishers, who are unable to maneuver in such a gigantic facility. The European catches are then canned in a factory where the workforce is underpaid and mainly made up immigrants (Kenyan, Malagasy or Filipino). Ultimately, the tuna is re-exported to European markets, escaping the lowest customs duty thanks to the economic partnership between the European Community and the States of Eastern and Southern Africa.[21] All these mechanisms of capitalist exploitation are at work to spoil European consumers with fish at reduced prices.

Following on from the French 'development aid' policy of the late 1980s, the European Union continues to develop its own industrial fishing industry, with no regard for local aspirations as local fishers take a dim view of this industrial fishing industry.[22] Industrial companies are the winners along the entire production chain, from the point of catch to the market sale.

13 FAO data (FishStatJ; 2021).
14 FAO data (FishStatJ; 2021).
15 IOTC (2021) Executive summary: Yellowfin tuna (2021).
16 Fu *et al.* (2022) Preliminary Indian Ocean bigeye tuna stock assessment 1950-2021 (stock synthesis) — IOTC– 2022-WPTT24-10.
17 IOTC (2022) Review of Indian Ocean skipjack tuna statistical data.
18 European Commission (1980) Proposals relating to structural policy in the fisheries sector.
19 SFA (2021) Fisheries statistical report - Year 2021.
20 Banque européenne d'investissement (2018) Soutien européen à la modernisation et à l'agrandissement du principal port des Seychelles.
21 Conseil de l'UE (2009) Décision du Conseil du 13 juillet 2009 relative à la signature et à l'application provisoire de l'accord intérimaire établissant le cadre d'un accord de partenariat économique entre les États d'Afrique orientale et australe, d'une part, et la Communauté européenne et ses États membres, d'autre part.
22 Andriamahefazafy *et al.* (2020) The paradox of sustainable tuna fisheries in the Western Indian Ocean: between visions of blue economy and realities of accumulation.

The European domination of industrial fishing in the Indian Ocean is evident in all decision-making processes relating to the tuna sector. It operates from a neo-colonial perspective, promoting destructive fishing practices with the sole aim of defending its private interests.[23]

Since the start of our '**TunaGate**' series in November 2022, we have demonstrated:

- The overwhelming presence of a very large number of European industrial lobbyists in the ranks of delegations from the European Union, but also from Mauritius and the Seychelles,[24] within the framework of the Indian Ocean Tuna Commission (IOTC), an organization under the umbrella of the FAO that is responsible for managing tuna fisheries in the Indian Ocean;
- The unconditional support of the European Commission and the French and Spanish governments for the tuna industry in promoting the highly destructive 'fish aggregating devices' (FADs);[25]
- The total absence of controls on French vessels;[26]
- The toxic proximity between this very industry and the institutions that are supposed to control it. In November 2022, we revealed an incredible case of conflict of interest, when the key person in charge of tuna fisheries within the French administration was seconded by the latter to the industrial fishing lobby Europêche, a very active and nefarious force on tuna issues, to work on the same files.[27]

With this latest report in the '**TunaGate**' series, we make the link with another crucial file for the European tuna industry: the 'margin of tolerance', a much-weakened version of which has just been adopted by the European Parliament, greatly favoring the industry. With its implementation imminent, the European Commission will shortly publish a list of ports where the European tuna industry will be able to benefit from this weakened margin of tolerance. As the Seychelles is the strategic home of Europe's tropical tuna fishery, we take a closer look here to demonstrate the extent to which listing the port of Seychelles would be an environmental madness for the marine ecosystems in the Indian Ocean and the coastal economies that depend on them.

WHAT IS THE 'MARGIN OF TOLERANCE'?

A margin of tolerance weakened by a derogation from which the Seychelles could benefit.

For all European fishers, the rule is supposed to be the same: a 'margin of tolerance' (of error) of 10% per species. For example, a company fishing 100,000 kilos of species X and 100,000 kilos of species Y can legally truncate its declaration and declare only 90,000 kilos of each species.

The new derogation for tuna vessels — a 10% margin of tolerance per species, but in relation to the total volume of catches, up to a limit of 10% of total catches — would allow for a massive under-declaration of certain species.

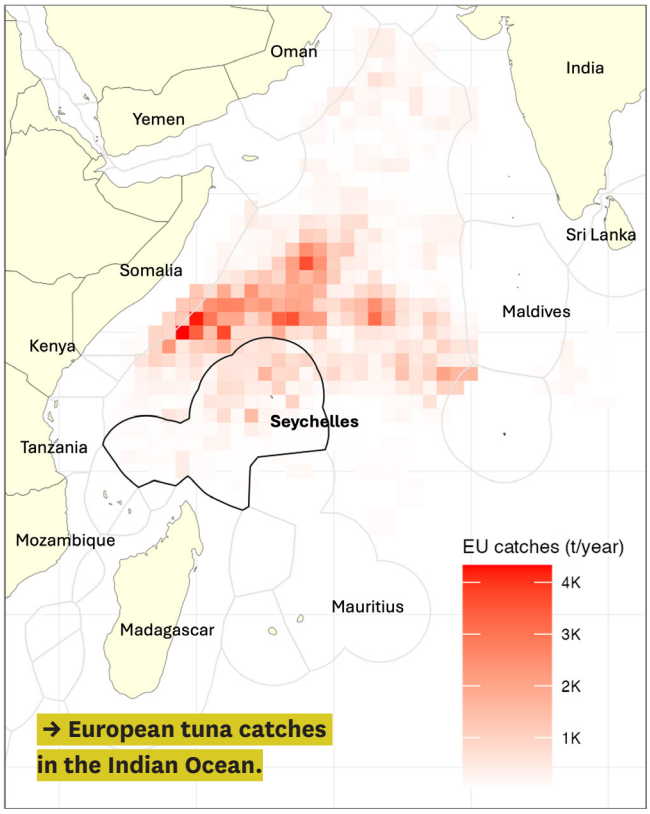
In concrete terms, a species that accounts for less than 10% of the global catche, as is the case for bigeye tuna (which has been overfished since 2022), could very well legally disappear from the official statistics.

23 See our report '[The EU Under the Rule of Tuna Lobbies]'.
24 See our report '[The EU Under the Rule of Tuna Lobbies]'.
25 See our report '[Lining up the ducks]'.
26 See our report '[Eyes Wide Shut]'.
27 See our report '[The Wild West of Tuna Fisheries in Africa]'.

THE SEYCHELLES: THE NERVE CENTER OF THE EUROPEAN TUNA INDUSTRY

The Seychelles occupies a central position in the European tuna industry: all purse seiners are based here (even when they are not registered in the Seychelles), and most of their catches are landed and transshipped[28] here. In 2021, 93% of the tuna caught by European purse seiners passed through this port.[29]

However, there is no credible traceability system in place and industrial companies and administrations seem to have created a system of opacity tailored to the needs of the industry.



28 The cargo is loaded onto a container ship and sent to another destination (Mauritius, Ecuador, etc.).

29 SFA (2021) Fisheries statistical report - Year 2021.

AN INDUSTRY WITHOUT ANY REAL TRACEABILITY

When European purse seiners arrive at the port of Victoria in the Seychelles, the procedure is to submit their catch documents to the *Seychelles Fishing Authority* (SFA), which is theoretically responsible for checking them. However, according to the many testimonies and information we gathered on site from journalists, artisanal fishers, environmental NGOs, and others, these controls are, at best, very rare, and at worst, completely non-existent.

In other words, once the cargo has been unloaded, there are two ways to dispose of the tuna:

- ➔ Some of it is kept on the island to be processed at the IOT plant owned by Thai giant 'Thai Union';
- ➔ The significant quantity that is left is transshipped to other foreign processing plants via refrigerated cargo or container carriers.

In 2021, only 62,000 tonnes of tuna were landed in port by European vessels, while a further 325,000 tonnes from the same vessels — 84% of the total — were transshipped onto other vessels[30] bound for Mauritius and Madagascar, where other processing plants are located,[31] or Thailand and Ecuador where the journey continues.

For these transshipped catches, there is a complete lack of traceability, as the SFA has no authority over these transshipments. It is the shipowners themselves, with the help of opaque, offshore trading companies, that handle the transfer of their cargoes, according to market prices. In other words, it is the industry who leads the declaratory process, without any independent checks whatsoever. In the SFA's own words, "*Landing and transhipment information can be obtained from either the local representative (agent) of the vessel or the vessel owner*",[32] which means that only the industy has access to this valuable data. As a result, French and Spanish shipowners are free to make whatever arrangements they wish with their catches, with no consistent monitoring.

30 SFA (2021) Fisheries statistical report - Year 2021.
31 Two in Mauritius, owned by another tuna canning giant, Princes, and one in Madagascar, owned by 'Pêche et Froid Océan Indien, now owned by Dutch industrial fishing giant Parlevliet & van der Plas, which also owns France's largest tuna fishing company, CFTO.
32 SFA (2021) Fisheries statistical report - Year 2021.

As far back as 2010, when *Oceanic Developpement* and *Megapeca Ltda* carried out an assessment of the fisheries agreement between the European Union and the Seychelles, it emerged that there was widespread fraud committed by European shipowners on their catch figures. 'For several years, **the SFA has expressed doubts about the reliability of European shipowners' declarations.** They were suspected of not declaring all their catches in the Seychelles' EEZ in order to underestimate the amounts they would have to pay if the reference threshold set by the license were exceeded. These statistical discrepancies have led to strained relations between the European Union and the Seychelles'.[33] These fraudulent practices led the Seychelles to renegotiate the fishing agreement, with payment independent of the tonnage caught.

This total lack of transparency has very clear repercussions on the statistical data available and means that no credit can be given once the various data sources have been compared and cross-referenced. We will now explore three very concrete examples: France, the Seychelles, and Spain.

Example 1: France

According to SFA data for the year 2021, France transshipped just over 68,000 tonnes of tuna through the port of Victoria: nearly 24,000 tonnes were landed at the port for local processing and 44,000 were transshipped and redistributed to other countries. However, according to the FAO's *FishStatJ database*, which is a reference in this field, the Seychelles declared that they imported 38,000 tonnes of tuna from France, i.e. 14,000 tonnes more than France's official landings... What explanation can be given for this difference of almost 60% between these two figures, which are supposed to represent the same trading operation? The explanation will certainly not come from an analysis of the French data. In fact, again for the year 2021, French customs only record an export from France to the Seychelles of around 6,800 tonnes of frozen tropical tuna, with an **astonishing identical allocation of 50%-50%, to the nearest tonne**,[34] between skipjack and yellowfin tuna (given that the official catches declared within the framework of the IOTC are more in the order of 60% and 35%, respectively). These declarations — in addition to the unusual allocation between species — are therefore 10 times less than the total quantity transiting the Seychelles, and 3.5 times less than what was landed according to the Seychellois authorities.

Ultimately, therefore, it is impossible to understand and accurately track the trade flows of tuna caught by French vessels in the Indian Ocean, as the data is so inconsistent and opaque.

FRENCH LANDINGS AT PORT VICTORIA: WHAT DATA SHOULD WE BELIEVE?

Source	Operation	Tonnes
SFA	French landings at the Port of Victoria	23,853
FAO	Seychelles imports tuna caught by French vessels	37,804
French Customs	Export of tuna caught by French vessels to the Seychelles (= exact mirror of the line above)	6,793

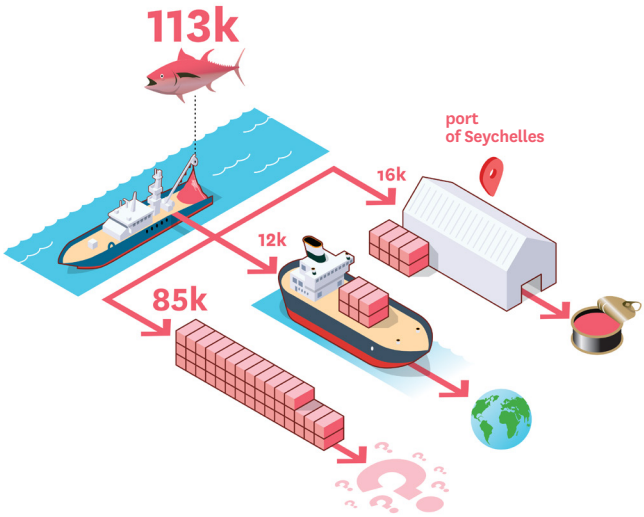
33 Convention Spécifique n°25 Ex-post evaluation of the current protocol to the fisheries partnership agreement (FPA) between the European Union and Seychelles, and analysis of the impact of the future protocol on sustainability https://transparentsea.files.wordpress.com/2012/03/seychelles-final-report-2010.pdf

34 French customs data, available at https://www.douane.gouv.fr/la-douane/opendata

Example 2: the Seychelles

According to the fishing vessel register available on the IOTC website,[35] all 13 purse seiners registered in the Seychelles are in fact Spanish-owned. These purse seiners make the Seychelles a major force in industrial fishing in the Indian Ocean, catching around 110,000-120,000 tonnes of tuna each year. The messy situation identified above for French vessels also applies: according to SFA data, 113,000 tonnes of 'Seychellois' tuna transited through Port Victoria in 2021, of which only 16,000 tonnes were landed for local processing. The remainder, 97,000 tonnes, were transshipped, but it is impossible to verify the accuracy of this declarative data, or to know its destination. For example, the Seychelles' government states in its highly aggregated international trade data[36] that 11,180 tonnes of 'fresh and frozen fish' (i.e. not canned locally) were exported in 2021,

leaving over 85,000 tonnes of tuna transshipped with no trace of declaration by the Seychelles government...



Example 3: Spain

The situation is very similar for our Spanish neighbors, who were even caught out by one of the IOTC working groups in 2019 for inconsistent catch declarations.[37] To date, these inconsistencies have still not been corrected, and it would appear that the consultancy *Cofrepêche* has been commissioned to produce a report on the problems with Spanish declarations (report not yet published). As the Spanish have also developed a large fleet of vessels registered in non-EU countries — led by the Seychelles (see above), but also Mauritius, Tanzania and Oman — this statistical and complicated situation is not about to be resolved, as the monitoring and control systems are deliberately deficient. It would appear that the figures declared by Spanish companies in no way correspond to the reality of each vessel. In fact, the trading companies working for the Spanish, Seychelles and Tanzanian fleets ultimately provide catch data that fit (more or less) what is required at the regional level. This data manipulation ensures that shipowners do not exceed the limits imposed by the IOTC, to the detriment of satisfactory statistical monitoring of the population of various tuna species.

This discrediting of statistical monitoring is directly reflected in the discourse of Spain's leading tuna lobby, OPAGAC. In an advocacy document available on their website, the lobbyists call on the authorities to stop bothering about catch reporting, but to rather focus on counting the fishing vessels active in the region.[38] However, how can we trust an industry in which one of the main stakeholders has been convicted of illegal fishing on several occasions? A recent study by the *Financial Transparency Coalition* singles out **Albacora SA** as the main European company responsible for illegal fishing, with no fewer than seven offences in the early 2010s.[39]

35 IOTC (2024) Register of authorized vessels.
36 Government of Seychelles (2021). Available at: https://www.nbs.gov.sc/downloads/1198-merchandise-trade-2021-q4/viewdocument/1198.
37 Blue Marine Foundation (2020) Tropical tuna catch calculations and reporting by Spain.
38 Opagac (2019) La flota atunera española cree que ICCAT debe cambiar su modelo de gestión para el atún tropical atlántico.
39 Financial tranparency coalition (2022) Fishy networks: Uncovering the companies and individuals behind illegal fishing globally.

SEYCHELLES-EU TRADE: A LUCRATIVE BUSINESS ABOVE THE LAW?

The European Commission carries out audits to monitor the implementation and enforcement of EU legislation on food and feed safety, animal health and welfare, plant health and certain areas of human health protection. It is during one of these audits[40] that the truth about the tuna industry becomes most striking.

Products destined for the European market must comply with very precise specifications. In the case of Indian Ocean tuna, products must come from fishing vessels and processing plants approved in advance following precise controls.

The audit revealed that a number of vessels and factories did not comply with a number of regulations, yet continued to export their products to the European market. In addition, there is also mention of situations where vessels not authorized by the Union were used to supply tuna to certain processing plants. This is another example of the total lack of traceability to which manufacturers have become so accustomed as they evade consumer protection laws and regulations. The audit also revealed a lack of control over most of the fishing vessels supplying the European market. In some cases, trade data and certificates were backdated, with evidence revealing:"*In a few cases, EU export certificates were issued manually after the products had left the control of the competent authority (products on board the transport vessel already en route to the EU). In addition, these EU export certificates were issued with an earlier date.*
The audit team saw evidence that an EU export certificate had been issued on a Monday (day 0) (backdated from the previous Friday (day -3)), for products that had been placed in containers from Tuesday to Thursday (days -6 to -4) and had left the Seychelles on Friday (day -3). The agent contacted the competent authority on Friday (day -3) and submitted the application for certification on the following Monday (the day the EU export certificate was issued - day 0). This does not comply with the certification rules contained in Directive 96/93, in particular Article 3."

The overall conclusion of the audit is unequivocal: "*As a result of the above, the competent authority is not in a position to confidently provide the guarantees relating to official controls of the production chain required by the EU export certificate when exporting tuna fishery products to the EU*".

The tuna industry, even after being exposed by such an audit, was not worried by the slightest sanction and/or questioning of its harmful practices.

40 European Commission (2017) Final report of an audit carried out in the Seychelles from 24 January 2017 to 02 February 2017 in order to evaluate the control systems in place governing the production of fishery products derived from tuna species intended for export to the European Union.

INCREASED RISK OF ILLEGAL ACTIVITY

The analysis of trade data is an essential tool for monitoring the health of tuna populations. As we have just seen, there are many discrepancies between catch and trade declarations for fleets operating in the Indian Ocean.

These differences can be explained by a number of factors:

- First of all, there is a TOTAL absence of control and monitoring for European fisheries. The Seychelles Fishing Authority's 2022 annual report shows only 8% of fishing days observed for the French fleet and less than one in two for the Spanish fleet.[41] But again, as per the above, a 'control' does not even mean anything;

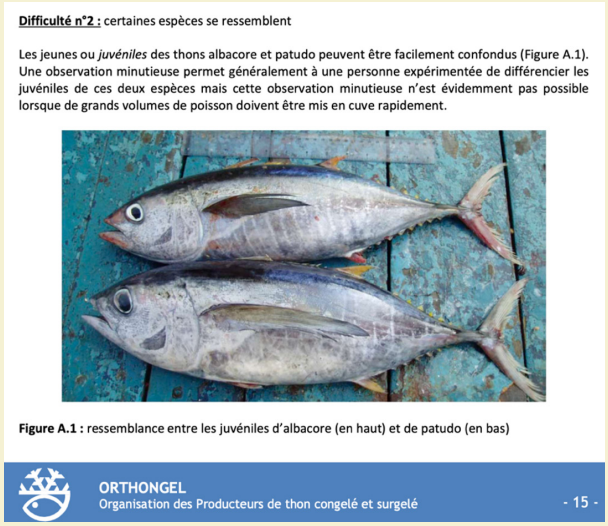
- Secondly, the non-selectivity of the fishing methods used by European vessels prevents any meaningful statistical monitoring, as FAD fishing renders it impossible to distinguish species, due to juveniles of several species looking alike. These difficulties are best explained by representatives of the French fishing industry themselves (see 'We can't respect the law. Let's change it!' on the next page).

41 2022 annual report of the Seychelles Fishing Authority.

WE CAN'T RESPECT THE LAW. LET'S CHANGE IT!

It is with this uncompromising logic that the European tuna industry has obtained a weakened 'margin of tolerance' at the European level. A lobbying document produced by Orthongel indeed reveals the underbelly of their deadly industry. Both yellowfin and bigeye tuna species in the Indian Ocean are currently overfished and have been for several years. The French industrial fishing industry explains that: "*Based on data collected on landings for 2019 and 2020, Orthongel estimates that, on average, the margin of tolerance is respected for one in two trips for yellowfin tuna, and one in five trips for bigeye tuna*".[42] In fact, there is a significant discrepancy between the declarations made on board and those recorded on landing.

According to the industry, there are two problems. Firstly, that baby bigeye and yellowfin tuna are too similar to be accurately reported (see screenshot below). This targeted capture of babies is a direct consequence of the use of FADs, but rather than changing their destructive fishing methods, their strategy was to weaken regulations and to continue to allow the catch of baby tuna from species that are currently in a critical state.



Difficulté n°2 : certaines espèces se ressemblent

Les jeunes ou *juvéniles* des thons albacore et patudo peuvent être facilement confondus (Figure A.1). Une observation minutieuse permet généralement à une personne expérimentée de différencier les juvéniles de ces deux espèces mais cette observation minutieuse n'est évidemment pas possible lorsque de grands volumes de poisson doivent être mis en cuve rapidement.

Figure A.1 : ressemblance entre les juvéniles d'albacore (en haut) et de patudo (en bas)

ORTHONGEL
Organisation des Producteurs de thon congelé et surgelé - 15 -

Another argument is that the main European tuna landing ports are not sufficiently-well equipped to weigh incoming tuna. For Orthongel, this explains the uselessness of the margin of tolerance. However, this argument also points to the unreliability of catch data from the European fleet. It highlights the shortcomings identified by the analysis of catch and trade data described above. In the Seychelles —and probably elswhere, be it in Mauritius, Madagascar, or Ecuador — nothing is accurate. Tuna are caught at a very young age, with all species unsorted, and they are therefore not counted correctly for convenience. Nowadays, two out of three species are overfished, and industrial stakeholders themselves admit that they have no way of knowing what they are catching.

European tuna management in the Indian Ocean lacks any real traceability and is leading to a significant risk of illegal fishing, with catch declarations below what is actually caught. This management opens the door to a multitude of cases of fraud and is **completely and utterly unacceptable**.

It is a serious threat not only to the survival of tropical tuna species, but also to the local populations and economies that depend directly on them for their survival.[43]

42 Orthongel (2024) La problématique de la marge de tolérance.

43 A WWF report in 2023 estimated that illegal tuna fishing was worth almost $100 million to the countries of the southern Indian Ocean, undermining poor economies such as those of Tanzania and Mozambique.

A TUNA HUB CREATED BY AND FOR THE EUROPEAN INDUSTRY

In the late 1970s, when Seychelles' waters was overfished and stocks were beginning to decline, the Seychelles entered into partnerships with foreign powers to assess the quantity of resources available on the high seas. Thus began the French adventure in the waters of the Indian Ocean. Following a meeting between representatives of the Seychellois and French governments and the Orthongel organization (representing French tropical tuna vessels), an agreement was reached to send a small French seiner in the early 1980s. To support this initiative, the FIOM (for *Fonds d'intervention et d'organisation des marchés des produits de la pêche maritime et de la conchyliculture*, i.e. the Intervention and market organization fund for fisheries and shellfish products, which later merged with other bodies to become FranceAgriMer) agreed to cover two-thirds of the campaign's financial risks, while the remaining third was covered by *Armement Coopératif Finistérien*, which offered the use of one of its purse seiners. A seiner was therefore sent out for at least 75 days at a cost of 3 million francs (equivalent to 1.5 million current euros).[44]

The results of this exploratory phase demonstrated the productivity of certain areas, prompting industrial stakeholders and governments to continue exploration. The second French campaign was led by the seiner *Yves de Kerguelen* with a larger-scale cooperation. It benefited from the support of Cofrepêche (initially a French consortium for the development of fishing, now a consultancy firm, which leads the analysis of Spanish data mentionned above…), which provided the management, Orthongel provided the funding and FIOM risk insurance, and involved more scientists with a six-month expedition. The campaign was successful thanks to the use of advanced technology such as helicopters and infrared radiometry. This led to a third and final French expedition, involving a flotilla of four purse seiners in partnership with Cobrecaf (a historic French shipowner, whose successive mergers have resulted in today's CFTO, France's largest tuna shipping company), CMP (a shipowner based in Brittany) and ACF. These latest surveys confirmed the importance of the Seychelles as the region's fishing hub, and the expansion of the French fishery began in earnest in 1984, coinciding with the substantial collapse of catches in the Atlantic Ocean and leading to a mass exodus of French (and later Spanish) purse seiners to the Seychelles.[45]

The development of tuna fishing in the Seychelles is therefore closely linked to the interests of French industrial players. This expansion of fishing in the Seychelles has led to the modernization of port infrastructures, where the Seychelles Fishing Authority (SFA), in charge of catch monitoring and control, and the IOTC, are now also located.

DEVELOPMENT OF TUNA PROCESSING ACTIVITIES

However, the development of the port's tuna business was not linked to fishing campaigns and the development of port infrastructures alone. European interests were also involved in the development of the canning business.[46] Investment in canning initially took the form of a joint venture between the Seychellois government, *Pêcheurs de France* — one of the three major French canning producers at the time (along with Saupiquet and Pêche et Froid) — and the ACF.[47] The joint venture was called *Conserveries de l'Océan Indien* (COI), and the Seychellois government was the majority shareholder. *Pêcheurs de France* contributed its foreign marketing expertise, ACF provided two specialized seiners, and the government provided the land and built the plant. The plant was 50% financed by a loan from the *Caisse centrale de coopération économique* (now the *Agence française de développement*, AFD).[48]

Today, the cannery is called 'Indian Ocean Tuna' (IOT), and after being partly owned by the American giant Heinz, it is now Thai Union that owns 60% of it, with the remainder still held by the Seychelles' government. Thai Union is the world's largest supplier of canned tuna and, in the wake of the Paradise papers, acquired the French company Petit Navire thanks to a clever financial package that enabled it to bypass the French tax authorities.[49]

44 In euro equivalent for the year 2023 (i.e. inflation of around 220% between 1980 and 2023).
45 Marsac *et al.* (2014) L'or Bleu des Seychelles.
46 Campling (2012) The EU centred commodity chain in canned tuna and upgrading in Seychelles. PhD Thesis.
47 Nageon de Lestang and Lablache (1989) The S. W. Indian Ocean Tuna Fishery, unpublished mimeo, Victoria: Seychelles Fishing Authority
48 Marsac *et al.* (2014) L'or Bleu des Seychelles.
49 France Télévision (2019) Pêche industrielle : gros poissons en eaux troubles.

PLAYERS WITH DIFFERENT PRACTICES

Unlike France, which has its tuna caught in the Indian Ocean processed directly on site in the factory in the Seychelles, Spain (over 50% of the European tuna trade) seems to have opted for a different strategy: Spain mainly imports frozen tuna from all over the world, with no real traceability, partly from its own fisheries, for canning directly in Europe for the European market.

The Netherlands — which accounts for almost 20% of Europe's tuna trade — is playing an increasingly important role in this sector, assuming the role of one of Europe's most important transit points. Between 2012 and 2021, the volume transiting through the Netherlands tripled,[50] and the Netherlands has also invested throughout the industry, for example by acquiring the largest French fishing fleet — Compagnie française du thon océanique (CFTO) — and the 'Pêche et Froid' cannery in Madagascar. At the recent *XI ANFACO World Tuna Conference* in Vigo, Spain, Jose Bernas, General Manager of Atunlo (a Spanish tuna canning company), pointed to discrepancies in regulations between European countries, which have led to a worrying increase in unregulated imports. He criticized the lack of control over tuna freezing conditions, particularly in Dutch ports.[51]

50 FAO (2023). FishStatJ database

51 UndercurrentNews (2023) Atunlo exec claims lack of controls on frozen tuna at some EU border points.

OUR TOP PRIORITIES

The landing and trade of European tuna catches in the Indian Ocean are clearly subject to a deplorable lack of monitoring and control, rendering any statistics quite unreliable. The Seychelles — due to its strategic interest for the European industry — lies at the heart of this opaque system, serving as a hub for the laundering of hundreds of thousands of tonnes of tuna catches, with dramatic impacts on the region's marine ecosystems.

So, in answer to our initial question,"Where does the tuna we eat in Europe come from?", we can offer no answer, and the evidence we have been able to gather in the course of our work leads us to the following conclusion: when a can of tuna is labelled with an origin or a species, it is likely wrong, given that it is impossible to track commercial movements from the boat to the plate.

These conclusions beg two demans on our part:

REQUEST NO. 1: EXCLUSION OF THE SEYCHELLES FROM THE LIST OF PORTS IDENTIFIED BY THE EUROPEAN COMMISSION

In the context of the revision of the Control Regulation and the dramatic weakening of its margin of tolerance for tuna fisheries, the Seychelles must not be included among the ports listed by the European Commission so as to benefit from this new margin of tolerance. This margin must remain as strict as possible and go hand in hand with our second request. Beyond the case of the Seychelles, the European Commission needs to carry out a rigorous assessment to exclude all ports that do not have sufficient control resources to ensure a robust quality of landing statistics.

REQUEST NO. 2: REAL MONITORING OF LANDINGS AND TRANSSHIPMENTS

The Seychelles Fishing Authority must provide full transparency regarding transshipment and landing data. It is unacceptable that data concerning almost all tuna transiting through the Seychelles are based solely on the willingness of the industry to transmit data. The European Union must force the tropical tuna industry to comply with their reporting obligations for the various species of tuna caught.



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