



**North Pacific Fisheries Commission**

NPFC-2025-TCC08-IP05 Rev.1

**Information paper submitted by the Secretariat.**

## **2024 High Seas Boarding and Inspection Overview**

### **Abstract:**

This document provides a summary of the high seas boarding activities in the NPFC Convention Area in 2024 and provides statistics on the inspections and violations encountered and presents data on historic trends since 2018.

Amendment Rev1; Revised the number of Authorized vessels in Table3

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## HSBI Summary 2024

**Abstract:** This document provides a summary of the high seas boarding activities in the NPFC Convention Area in 2024 and provides some statistics on the number and types of violations highlighted in the HSBI reports since the inception of the program in 2018.

### 1. Introduction

The CMM for high seas boarding and inspection procedure was adopted at the third Commission Meeting in 2017 for the purpose of ensuring compliance with the provisions of the Convention and conservation and management measures. Implementation began in 2018 when NPFC adopted the [NPFC-2018-TCC03-WP09 Rev. 2 HSBI 2018-2019 Implementation Plan.pdf](#), which is currently under review by the SWG Operations.

Since 2018, a total of 162 HSBI events have been conducted. Fifty-three at-sea inspections were carried out in the NPFC Convention Area in 2024 by 4 Members, and at least one Member also conducted aerial surveillance to support the HSBI missions. Almost 8.6% of active vessels in the Convention Area were inspected in 2024.

### 2. NPFC Inspection Vessels

All authorized inspection vessels are listed and maintained on the Commission website. Six Members have indicated their intention to participate in the HSBI program and have collectively registered 79 inspection vessels. In 2024 (Table 1), the number of inspection vessels in the Register increased by 25 from 2024, and 5 patrol vessels conducted inspections in the Convention Area during the year.

Four Members signaled their intent to conduct patrols in the Convention Area in 2024 and requested access to VMS data for patrol planning purposes. Table 1 shows the numbers of inspection vessels registered by Member as of 6 January 2025.

Table 1: Registered Inspection Vessels as of 5 February 2025.

Canada	China	Japan	Russia	Chinese Taipei	United States	TOTAL
4	26	4	16	6	23	79

### 3. HSBI Events and Outcomes in 2024

#### 3.1 HSBI Event/Outcomes by Inspecting Member

In 2024, 53 high seas inspections were reported by the four Members with an inspection vessel presence. Thirteen violations (3 of them serious) were noted from eleven HSBI reports. Table 2 below shows the breakdown, by Member, of boardings conducted, and the outcomes of the inspections.

Table 2: 2024 Inspections/Outcomes by Inspecting Member.

Inspecting Member	Number of Inspections	INSPECTION OUTCOME		
		“No Violations” Noted	“Violations” Noted	“Serious Violations” Noted
Canada	9	7	0	2
China	9	9	0	0
Japan	18	13	4	1
US	17	13	4	0
<b>Total</b>	<b>53</b>	<b>42</b>	<b>8</b>	<b>3</b>

#### 3.2. Authorized /Active vs. Inspected Vessels in 2024

TCC07 (para 83 Final report [7th Technical and Compliance Committee Meeting | NPFC](#)) requested the addition of the numbers of authorized and active vessels in the HSBI report. These numbers are presented below in Table 3. The number of authorized/active vessels is based on information submitted in the annual reports.

Table 3: Authorized/Active vs. Inspected Vessels by Inspected Member in 2024

Member	Number of Authorized Vessels	Number of active Vessels	# of Inspected Vessels	% of Active Vessels inspected
China	741	259	38	14.7%
Japan	362	121	9	7.4%
Korea	41	5	2	40%
Russia	73	14	0	-
Chinese Taipei	101	70	4	5.7%
Vanuatu	6	4	0	-
<b>TOTAL</b>	<b>1,324</b>	<b>473</b>	<b>53</b>	<b>11.2%</b>

### 3.3. Inspections by Vessel Type

Most (>70%) of the inspected vessels were purse seiners, followed by jigger vessels and fish carriers and reefers. The remaining vessels were lift netters, hand liners, dip netters and stern trawlers.

Table 4: Inspected Vessels by Vessel Type.

Vessel Type	Number of Vessels	% of Vessel Types Inspected
Purse seiners	19	35.7 %
Jigger vessels	11	20.8 %
Fish carriers and reefers	8	15.2 %
Lift netters	6	11.3 %
Hand liner vessels	4	7.5 %
Dip net	3	5.7 %
Stern trawler freezer	2	3.8 %
<b>TOTAL</b>	<b>53</b>	<b>-</b>

### 3.4. 2024 Violations

Of the 13 “violations” identified during the 2024 HSBI season, most - about 69%, related to vessel registry and marking issues. Table 5 shows the breakdown of violations by type / measure. The violations identified and the responses from the inspected Members are shown in Annex 1 and Annex 2, as per paragraph 87 of TCC07 Final Report ([Technical and Compliance Committee \(TCC\) Meetings | NPFC](#)) .

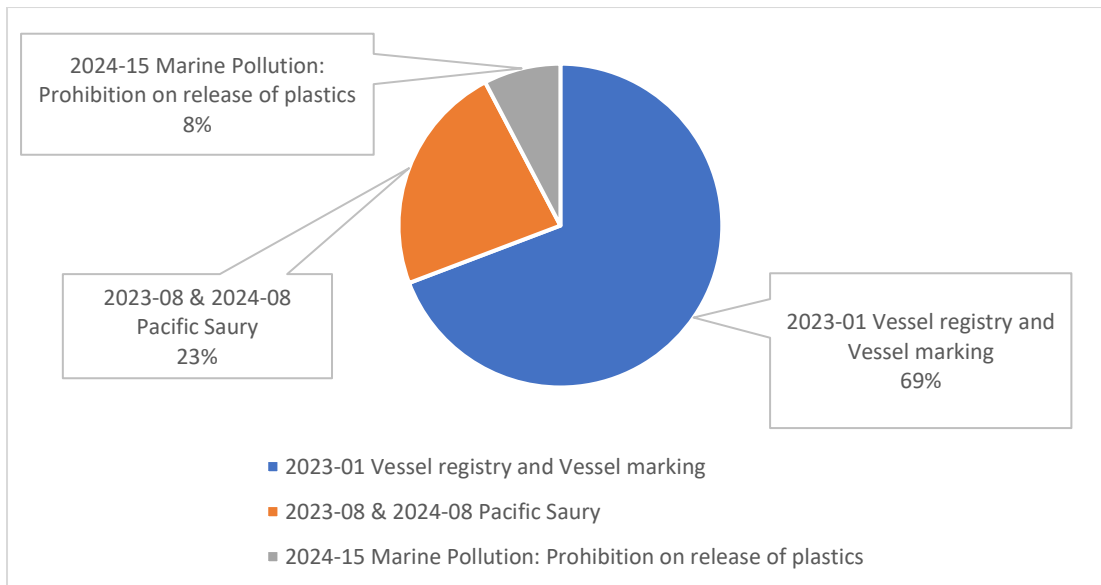
Table 5: Breakdown of “violations” identified through HSBI by CMM in 2024<sup>1</sup>.

CMM REFERENCE	# VIOLATIONS IDENTIFIED
01 (para 6) Vessel registry: Vessel registry	1
01 (para 5 Annex2) Vessel registry: Vessel marking	8
08 (Para12) Pacific Saury: Fishing after the date of the closure	2
08 (Para14) Pacific Saury: Retain all the catch on board	1
15 (Para 8) Marine Pollution: Prohibition on release of plastics	1
<b>TOTAL</b>	<b>13</b>

The graph below displays the percentage of violations associated with 3 CMMs in 2024.

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<sup>1</sup> Note that most (32/53) HSBI events occurred prior to 24 July when 2024 CMMs entered into force.



Graph 1: Percentage of Violations by CMM in 2024

### 3.5. Boarding Remarks/Notes

As inspection reports are uploaded to the HSBI Events page, ([HSBI Events | NPFC](#)) they record reflect one of the following three inspection outcomes:

1. No Violations
2. Violations
3. Serious Violations

Page 3 of the inspection form (below) contains a section for inspectors to record details of any observed non-compliance, and this is sometimes followed up with additional documentation to accompany the inspection form. The first section is typically used to record details, such as CMM and paragraph number, related to any “observed non-compliances”.

DETAILS OF OBSERVED NON-COMPLIANCES	
Remarks regarding boarding and vessel compliance with Commission Conservation and Management Measures:	
BOARDING REMARKS	
ENFORCEMENT VESSEL NAME	FLAG
BOARDING OFFICER'S NAME(S)	BOARDING OFFICER'S SIGNATURE

The space allocated for “Boarding Remarks” is being used for a variety of purposes- sometimes to record weather conditions or good cooperation from captain and crew. In some cases, however, this section reflects potential non-compliance, even in some cases where “No Violations” has been selected as an outcome.

Forty-three of the fifty-three inspection reports contained “Boarding Remarks”, the majority of which indicated generic comments about crew cooperation and the lack of compliance issues noted in the inspection report. However, even in cases where “No Violations” were reported, this section was sometimes used to reflect potential non-compliance. These situations are explained in some cases, however, in others there appear to be instances of potential non-compliance being reported, even though the “No Violations” option was selected as an inspection outcome.

The following examples are presented to illustrate situations where “No Violations” is selected as an inspection outcome, however, comments in the “Boarding Remarks” section of the inspection report reflect potential non-compliance.

#### Case # 1

*“Cooperative captain. \* Discrepancy on saury in logbook & what was said.”*

#### Case # 2

*“1. The ship's name logo "SG"?? astern is partly blocked by the garbage.*

*“2. The IRCS marking on upperdeck is blocked.”*

#### Case #3

*“The boarding ladder did not satisfy the standards recommended by NPFC. Hand holds were not provided from deck to the head of the ladder and vice versa (Annex A). CMM 2024-11 The vessel did not specify the species name of squid in its record, and just recorded as "squid" in the logbook. The species should be recorded precisely.”*

In one situation “No Violations” is the selected outcome of the inspection and the “Boarding Remarks” section (“Compliant master – currently offloading”) makes no reference to non-compliance, but the “Details of Observed Non-Compliances” section contains the following :

*“Potential violation - Garbage - None onboard, no record of offload, garbage on rail outside of ship- burn barrels not used. 2024-15 CMM- shall take all measures to ensure vessel does not release garbage, plastic at sea.”*

Additionally, the “Notes” section on the HSBI Events page for the same inspection records the following:

*“Inspectors were unable to confirm compliance with the Conservation and Management Measure on Pollution Prevention and Elimination. Although garbage management strategies were available, inspectors were not confident that waste had not been disposed of at sea.”*

These situations create challenges for the Secretariat to know if and how to reflect this information when reporting to Members.



## 4. HSBI Summary 2018-2024

### 4.1. HSBI Events and Inspection Outcomes 2018-2024

Since the program was launched in 2018, 162 inspection activities have been conducted in the NPFC Convention Area. Ninety-four (or 58%) of those inspections did NOT identify any violations but “violations” or “serious violations” were identified on the remaining sixty-eight events.

Table 6 below shows the annual number of HSBI events by inspected Member since 2018.

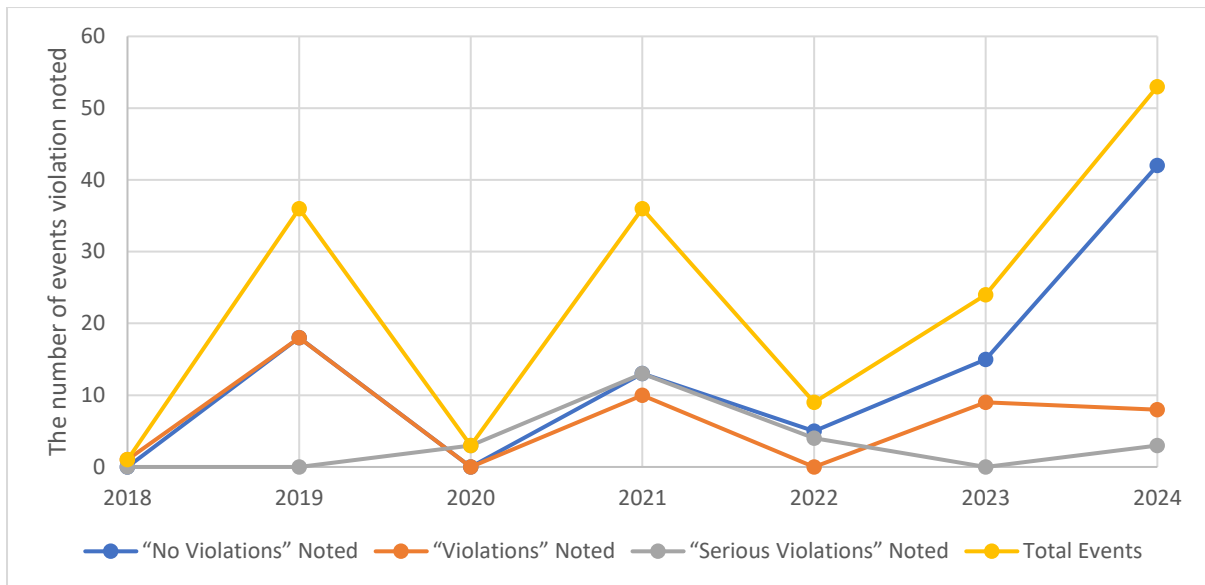
Table 6: HSBI Events by Inspected Member 2018-2024

YEAR	Total Events	China	Japan	Korea	Russia	Chinese Taipei	Vanuatu	Panama
2018	1	1	0	0	0	0	0	0
2019	36	26	1	1	1	5	0	2
2020	3	3	0	0	0	0	0	0
2021	36	19	1	4	2	8	1	1
2022	9	6	0	1	0	2	0	0
2023	24	11	4	3	0	2	1	3
2024	53	38	9	2	0	4	0	-
<b>Total</b>	<b>162</b>	<b>104</b>	<b>15</b>	<b>11</b>	<b>3</b>	<b>21</b>	<b>2</b>	<b>6</b>

Table 7 below shows the total events and outcomes for the period 2018-2024. Graph 2 illustrates the inspection outcomes over the same period. While the number of serious violations rose in 2024 compared to 2023, the increase was not significant compared to earlier years. The percentage of “No violation” events has been on an increasing trend over the last three years. While the number of serious violations rose in 2024 compared to 2023, the increase was not significant compared to earlier years. The percentage of “No violation” events has been on an increasing trend over the last three years.

Table 7: HSBI Events /Outcomes 2018-2024

Year	Total Events	Inspection Outcome		
		“No Violations” Noted	“Violations” Noted	“Serious Violations” Noted
2018	1	0	1	0
2019	36	18	18	0
2020	3	0	0	3
2021	36	13	10	13
2022	9	5	0	4
2023	24	15	9	0
2024	53	42	8	3
<b>Total</b>	<b>162</b>	<b>94</b>	<b>46</b>	<b>22</b>



Graph 2: HSBI Events with Outcomes 2018-2024

In some situations, multiple violations are detected during an inspection. In such cases, the number of violations may exceed the number of outcomes identified as “violations” or “serious violations”. For example, in 2024, there were eleven events noting violations, but thirteen violations were identified in these eleven reports. In Table 8 below, the number of violations identified each year is presented, along with a breakdown of how many were recorded as “violations” as opposed to “serious violations”.

Table 8: Number of Violations 2018-2024<sup>2</sup>

Year	#HSBI Events	“Violations”	“Serious Violations”	Total Violations
2018	1	1	0	1
2019	36	34	0	34
2020	3	0	9	9
2021	36	15	18	33
2022	9	0	10	10
2023	24	13	0	13
2024	53	10	3	13
<b>Total</b>	<b>162</b>	<b>73</b>	<b>40</b>	<b>113</b>

<sup>2</sup> The number and types of violations reflects the numbers reported on HSBI reports or updated following post-inspection investigations.

#### 4.2. Violations identified by CMM

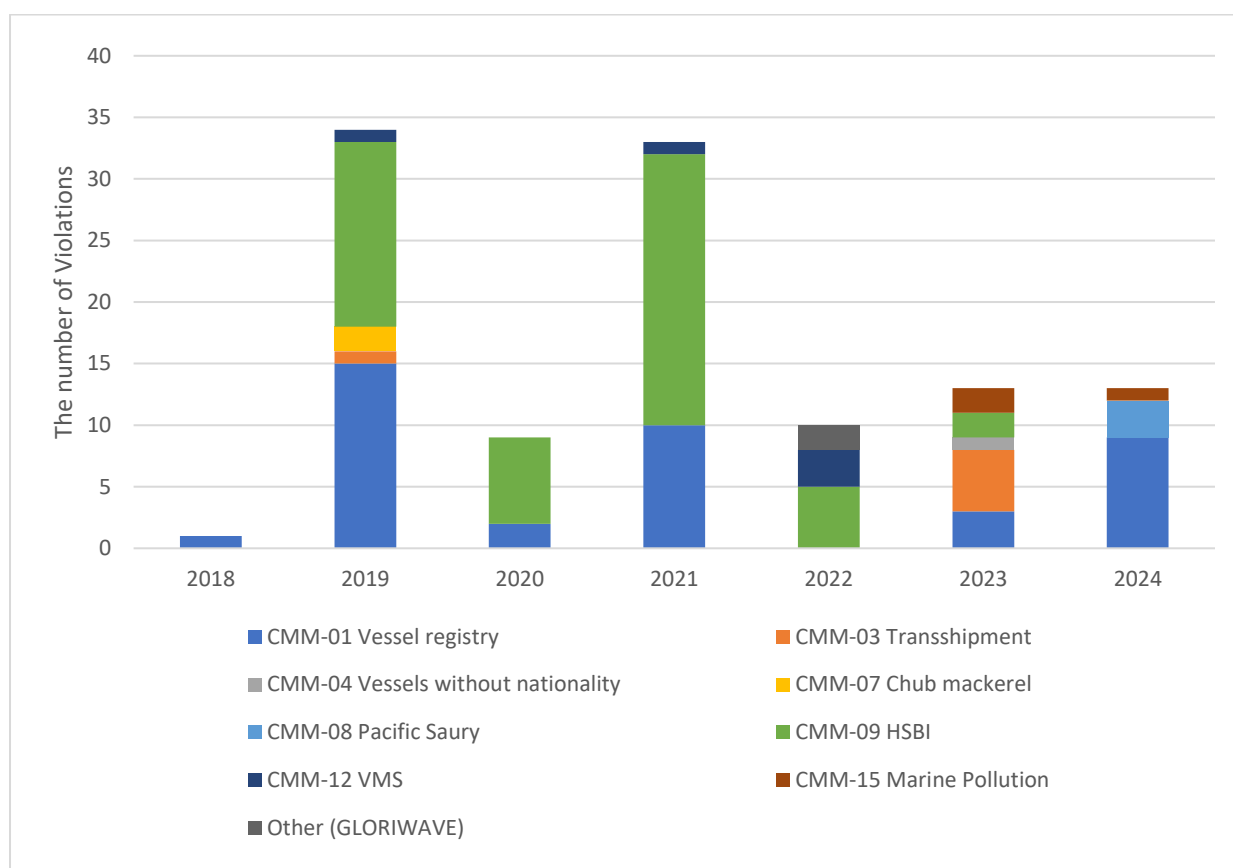
Of the 113 violations that have been identified since 2018, the majority were related to the vessel registry and markings(CMM-01) (36%) and failure to maintain records of catch as required in the HSBI measure (CMM-09) (17%).

Vessel marking violations continued to lead the numbers in 2024 with eight of the thirteen violations reported. The 2024 season saw a decline in violations recorded from the HSBI measure to zero, but it also marked the first time that violations were noted from a species - specific measure (CMM 08 Pacific saury).

Table 9: Violations by CMM 2018 to 2024

<b>VIOLATIONS IDENTIFIED IN HSBI REPORTS BY CMM 2018-2024</b>		
<b>CMM #</b>	<b>CMM REFERENCE</b>	<b># VIOLATIONS IDENTIFIED</b>
01	Vessel registry: Vessel registry	1
	Vessel registry: Vessel marking	39
03	Transshipment: Not allowed without registration	1
	Transshipment: Reporting of bycatch and unregulated species	1
	Transshipment: Record of transshipment declarations	2
	Transshipment: Without advance notification	1
	Transshipment: Stored separately and readily identifiable	1
04	Vessels without Nationality: Two flags	1
07	Mackerel: No VMS onboard while fishing for Chub Mackerel	2
08	Pacific Saury: Fishing after the date of the closure	2
	Pacific Saury: Retain all the catch on board	1
09	HSBI: Without license, permit or authorization	5
	HSBI: Failure to maintain records of catch	19
	HSBI: Intentional taking/retention of species in contravention of any CMM	6
	HSBI: Significant violation of catch limits or quotas	3
	HSBI: Using prohibited fishing gear	1
	HSBI: Falsifying or intentionally concealing the markings	1
	HSBI: Multiple violations	3
	HSBI: Vessel refused boarding and inspection	13
12	Vessel Monitoring System: Failure to transmit VMS data.	5
15	Marine Pollution: Prohibition on release of plastics	3
	Other	2
	<b>TOTAL</b>	<b>113</b>

The graph below shows the breakdown of violations identified over the 2018-2024 period, according to CMM, indicating a continuing trend for violations related to Vessel Registry (CMM-01) issues, but away from the use of provisions of the HSBI measure (CMM-09).



Graph 3: Violations identified by CMM 2018-2024

## 5. Next Steps for 2025

### 5.1 HSBI (Implementation) plan

Throughout the intersessional period, a need was identified to update the implementation plan [NPFC-2018-TCC03-WP09 Rev. 2 HSBI 2018-2019 Implementation Plan.pdf](#) to address outdated references and ensure HSBI inspectors have access to current information. The Co Leads of the SWG Operations have been working with the Secretariat to draft proposed upgrades to the HSBI page that could replace the plan with current information and contacts for use by MCS practitioners.

### 5.2 Mapping Application for Planned Transshipment Events

In 2025, the online application for transshipment has been updated to enable the mapping of transshipment events. This will allow inspectors to generate a map of planned transshipment events to facilitate patrol planning to target areas where activities are planned. Details may be found in the transshipment report (NPFC-2025-TCC08-IP08)

### 5.3. Incorporation of Aerial Surveillance Results on HSBI Events Page

One Member has reported on conducting aerial surveillance in the Convention Area, observing fishing activity and transshipment events in 2024. There is currently no reference to aerial surveillance process or procedures in the HSBI measure or Implementation plan, so it is not clear if and when Members conduct aerial surveillance, unless they request VMS access or voluntarily report to the Secretariat.

TCC 07 (paragraph 85 TCC07 Final report) requested *“that the Secretariat establish a mechanism for reporting aerial surveillance results on the HSBI page if the proposed amendment to CMM2023-12 On the VMS to clearly include aerial surveillance is adopted by the Commission.”*

Currently the Secretariat is aware that a member is undertaking aerial surveillance patrols only if a request is received to access VMS data into support such patrols and no aerial surveillance reports have been submitted to date. The Secretariat has been discussing options with the service provider for the generation of such a mechanism, however, more discussion is required with Members conducting these patrols to determine a format for reporting the patrol results.

### 5.4. Online Data Entry for HSBI/Aerial Surveillance Reports

The Secretariat is also reviewing with the service provider options to allow the online entry of HSBI (and eventually aerial surveillance) reports. Currently, HSBI reports are emailed to the Inspected Member and copied to the Secretariat, and then later uploaded to the HSBI Events page in pdf format.

The HSBI Events page was designed to facilitate the automated transmission of pre- and post-boarding notifications from the Inspection Party to the inspected Party. To date, however, this feature has not been used, and such notifications are emailed only.

While the Secretariat receives the inspection reports before they are uploaded, it can sometimes be challenging to understand whether the inspection outcome should be recorded as involving potential non-compliance due to some of the factors described in section 3.5 (Boarding remarks).

In addition, as the inspection data on the inspection forms is hand-written, it can be difficult sometimes to read/ transcribe the reports. A preferred option would be to have an online data entry portal into which inspectors could enter the data from inspection reports directly into the NPFC database. A costed proposal to establish such an online application is expected shortly and will include other enhancements to the HSBI Events page such as including aerial surveillance results.

## 6. Summary

In 2024, four Members conducted HSBI activities in the NPFC Convention Area, inspecting almost 11% of the active fishing vessels in the Convention Area. Fifty-three inspections were carried out over the May – October period, with no violations detected in forty-two of these. Of the remaining eleven events (identifying thirteen violations), three of these identified serious violations of fishing during a closed time and obscuring vessel markings.

As in previous years, most of the violations identified related to potential vessel registry offences, but in addition to fishing after a closure, potential violations were identified relating to discarding of fish and marine pollution.

While the number of serious violations rose in 2024, the overall number of inspections with no violations identified continued a 3 year upward trend. [OBJ]

# Annex 1 - Violations Identified in HSBI Reports 2024

Event #	Date	Issues & Response	
5	10 Jun	Issue 2023-01	IRCS on PORT/STBD hull are in reverse order. Vessel marking on pilot house(side) are correct.
		Response	This vessel did display IRCS in wrong order on both portside/starboard side. As a first approach, we've contacted the vessel owner and pointed out this mistake, and the vessel owner has realized his mistake and immediately repainted the IRCSs at sea as attached.
7	11 Jun	Issue 2023-01	Vessel horizontal markings not in compliance with CMM2023-01 due to last two digits not legible. See photos/photo log.
		Response	According to the photo taken in the boarding report, the IRCS on the horizontal surface is not clear, the last two digits is not legible. During the inspection, the vessel owner has already realized this mistake and repainted the IRCS immediately after the HSBI as attached.
8	12 Jun	Issue 2023-01	Attached skiff boat does not have IRCS/ITU markings
		Response	After thorough investigation and checking FAO FISHING VESSEL IDENTIFICATION AND MARKING guideline("FAO guideline"), we think these skiff boats mentioned in boarding reports don't need to have IRCS painted, thus would not be deemed as non-compliance issues. First, the word "vessel" in FAO guideline refers to any vessel intending to fish or engaged in fishing or ancillary activities, operating, or likely to operate, in all fishing waters and also includes a boat, skiff or craft (excluding aircraft) carried on board another vessel and required for fishing operations. We notice that this guideline focus on vessels have intention to conduct or support fishing activities. Second, the skiff boats in the boarding reports are actually rescue boats and these vessels won't engage in or support any fishing operations, they will only be used when human safety is in danger. Based on the above reasons, we believe these rescue boats don't have the necessity to paint IRCS on their surface, and the related fishing vessels have complied with the relevant NPFC CMM.
10	12 Jun	Issue 2023-01	Vessel's skiff boat does not have IRCS/ITU markings
		Response	After thorough investigation and checking FAO FISHING VESSEL IDENTIFICATION AND MARKING guideline("FAO guideline"), we think these skiff boats mentioned in boarding reports don't need to have IRCS painted, thus would not be

			deemed as non-compliance issues. First, the word "vessel" in FAO guideline refers to any vessel intending to fish or engaged in fishing or ancillary activities, operating, or likely to operate, in all fishing waters and also includes a boat, skiff or craft (excluding aircraft) carried on board another vessel and required for fishing operations. We notice that this guideline focus on vessels have intention to conduct or support fishing activities. Second, the skiff boats in the boarding reports are actually rescue boats and these vessels won't engage in or support any fishing operations, they will only be used when human safety is in danger. Based on the above reasons, we believe these rescue boats don't have the necessity to paint IRCS on their surface, and the related fishing vessels have complied with the relevant NPFC CMM.
20	28 Jun	Issue 2023 -01	The appearance of the vessel differs from the photo in the NPFC Vessel Registry.
		Response	There is one staff in our FMC responsible for NPFC registry, during the registration process of this vessel, the staff uploaded the wrong photo of another vessel which belong to the same owner and didn't recognize it. On June 29th, 2024, when inspectors pointed out this issue during the HSBI process, the owner contacted the staff immediately and the staff then changed the photo on NPFC registry right before the HSBI ended.
24	2 Jul	Issue 2023 -01	IRCS should be placed athwartships with the top of the numbers or letters towards the bow, but it is placed 90 degrees differently, from bow to stern (Annex 2).
		Response	According to our investigation, the IRCS board on the deck was in the correction direction when the vessel set sail for the fishing ground, however, due to the heavy wave in NPFC, the IRCS board became loose so the master asked crew members to tighten it. It was in the tighten process that the crew members mistakenly put the board in the wrong direction and they did not recognize this error. Right after the HSBI event, the crew members had put the IRCS board in the right direction, this potential non-compliance issue has been solved immediately
27	15 Jul	Issue 2023 -08	According to the remarks by the vessel master, this vessel released the smaller size of the catch of pacific saury. Therefore, this vessel did not retain all the catch of pacific saury on board.
		Response	To investigate the alleged potencial violations. We conducted the special port inspection. We confirms that the vessel retained smaller size of catch on board, which is also consistent with the master's statement and his comment in the boarding report. From our perspective, the master released the smaller size of fish alive under the consideration of fishery resources conservation, such action should not be considered as a breach of paragraph 16 of CMM 2024-08. We had instructed the vessel to retain all catch on board and continue to avoid catching smaller size of fish to conserve fishery resources.



		Issue 2023-15	According to the remarks by the vessel master, this vessel discharged incinerator ashes from plastic products into the sea.
		Response	The inspector's inquiry on the treatment of garbage on board, claiming that all plastic bottles were stored on board and incinerator ashes from garbage were discharged into the sea. When the inspector further inquired about the treatment of plastic garbage (excluding plastic bottles), the master stated that the plastic bags and plastic outer packaging of wet wipes were occasionally burned, raising the concerns that the incinerator ashes might be discharged into the sea as well. We did not find any concrete evidence of this potential violation during the inspection, also both the vessel's operator and master had denied burning and discharging plastic garbage into the sea in their statements. With such background, we issued an administrative guidance (warning) to the vessel, ordering the vessel to follow relevant marine pollution measures and shall take all reasonable precautions to prevent the release of garbage at sea. We will continue monitoring the improvement of the said matter.
43	14 Aug	Issue 2023-01	The spaces between letters of the vessel marking on the deck are less than h/6.
		Response	According to photos taken from the vessel, the IRCS seems to be not fully follow the specification in FAO Standard, the investigation regarding these issues are in process, according to the latest feedback from the owner of the vessel, he had remade the IRCS board on the deck and installed it as attachment 5, which we are convinced could reach the FAO Standard.
		Issue 2023-01	The width of the strokes for letters and numbers of the vessel marking on the deck are less than h/6.
		Response	According to photos taken from the vessel, the IRCS seems to be not fully follow the specification in FAO Standard, the investigation regarding these issues are in process, according to the latest feedback from the owner of the vessel, he had remade the IRCS board on the deck and installed it as attachment 5, which we are convinced could reach the FAO Standard.

## Annex 2- Serious Violations Identified in HSBI Reports 2024

<b>SERIOUS VIOLATIONS IDENTIFIED IN HSBI REPORTS 2024</b>				
#	DATE	CMM	<b>Issues &amp; Response</b>	
28	16 July	2023-01	Issue 2023-01	A lot of cardboard boxes and the cover were placed to completely obscure the vessel marking on the deck, but the cover was not marked.
			Response	As for the obscured IRCS marking identified on the deck of the vessel, the master had commented on the boarding report that he will remove the cardboard boxes placed on the marking immediately. The authority had ordered the vessel to rectify the matter and subsequently provided a photo as evidence of the improvement. The vessel had immediately improved the marking condition while operating at sea, the IRCS marking on the deck is now visible clearly.
53	16 Oct	2024-08	Issue 2024-08	Member's TAC for Pacific Saury was reached and closed. The captain stated he had caught saury after that day.
			Response	The authorities attach great importance to this issue and immediately required the vessel to return to port for investigation without delay last week. The vessel is already on its way back to port. At present, we are investigating and verifying the situation, and we will send you the investigation results after the investigation is completed.