

Ascension Island Fisheries Compliance & Enforcement Strategy

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1.0 Introduction

The Ascension Island Government (AIG) has established a management plan for the Ascension Island Marine Protected Area (MPA).

Enforcement of the MPA is of vital importance to MPA effectiveness, and will be implemented through the MPA management plan operational objective management action:

“Establishment of an effective Monitoring Control and Surveillance (MCS) and enforcement regime to prevent IUU¹ fishing within the MPA”

Further details of the management plan underpinning this strategy can be found in Annex 1.

This compliance and enforcement strategy also reflects AIG's:

- Broader responsibilities under the AIG Environment Charter [2001](#),
- General responsibility to enforce its own domestic legislation relevant to IUU fishing, and;
- Obligations as a coastal State signatory to the International Commission for the Conservation of Atlantic Tunas ([ICCAT](#))².

¹ IUU fishing [FAO Definition](#)

2.0 Scope and Timeframe

This compliance and enforcement strategy covers the period March 2020- March 2021, and will be reviewed by AIG at the end of that period. The personnel and legislative scope is as follows:

| Personnel | Relevant Legislation |
|--|---|
| <ul style="list-style-type: none"> • Fishery Protection Officers (FPO)³ – those who have the powers to enforce legislation relevant to this strategy. Specifically when: <ul style="list-style-type: none"> ○ Enforcing a criminal offence under that legislation ○ Implementing any voluntary code of conduct associated with the IUU threat • Blue Belt Surveillance and Intelligence Hub (BBSIH) personnel providing support and advice to AIG as part of the engagement agreement in place | <p>The legislation relevant to enforcement and prevention of IUU within the MPA – given in full at Annex 2</p> <p>AIG will update Annex 2 as legislation is amended, or as new legislation comes into force</p> |

3.0 Aims and Objectives

The overarching aim of this compliance and enforcement strategy, and the six objectives supporting delivery of that aim, are as follows;

Aim: “To achieve full compliance with relevant legislation within the Ascension MPA”.

1. All instances of suspected non-compliance will be recorded as intelligence. Where possible that intelligence will be developed by verification with additional information from relevant sources.
2. When a confirmed non-compliance event occurs, it will result in a proportionate sanction or outcome being applied.
3. AIG will endeavour to bring illegal activity under control if detected.
4. AIG will meet its international obligations as a coastal State member of ICCAT.
5. AIG will ensure that its FPOs are adequately briefed on the surveillance methodologies, and associated follow up procedures required for instances of non-compliance.
6. AIG will maintain an awareness of new surveillance technologies applicable to this strategy, and, if opportunities arise, look to use them.

departure from the EU

³ Fisheries Protection Officers are designated under primary legislation - Includes police officers, customs officers, Harbour Master and officers of the armed forces exercising FPO powers

4.0 Achieving Strategy Objectives

Annex 3 details the actions (with outcomes, outputs and targets) that AIG will undertake and where BBSIH will provide advice and support to ensure effective implementation of this strategy.

AIG recognises that effective enforcement of the MPA poses a significant challenge; the table below breaks those challenges down into key themes with mitigation approaches.

As an initial step to mitigate these challenges AIG will also use the assistance and support of the BBSIH.

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| Challenge | Approach |
|---|---|
| Surveillance and enforcement capacity and resource available to AIG is low, particularly in terms of capacity to monitor the “offshore” environment | AIG will target its resources to where they are most needed: <ul style="list-style-type: none"> • It will do this, with BBSIH support, by using an Intelligence-Led Risk-Based Enforcement Approach (ILRBE) when choosing where to carry out surveillance or conduct patrols • The ILRBE is an operating model that looks at threats to compliance within a regulatory framework (relevant legislation) and ensures decisions are based on intelligence, knowledge and experience |
| The MPA is very large, and ensuring surveillance covers a required area and detects IUU is important: <ul style="list-style-type: none"> • The MPA is 441,658km • Encroachment within the 200nm limit or fishing over the seamounts represent the highest risk areas | <ul style="list-style-type: none"> • AIG will focus surveillance efforts on “remote detection”, including those provided by BBSIH support • This will be predominantly satellite based and selected to maximise the capability of detecting IUU threats over a large area |
| The type of illegal activity that poses a threat to the MPA: <ul style="list-style-type: none"> • The most likely illegal activity is by foreign flagged vessels (possibly “dark”)⁴ fishing within the MPA, which have entered from surrounding high seas and are typically targeting tuna species • Dark vessels specifically targeting the seamounts within the MPA; typically targeting shark species | AIG, assisted by the BBSIH, will focus efforts to follow up on illegal activity administratively by using “flag State” responsibility ⁵ as a primary mechanism and: <ul style="list-style-type: none"> ○ Attempt to secure data only the flag State will hold to enable AIG to verify a suspect vessels activity ○ Attempt to secure prosecutions, if required, through flag State domestic legislation⁶, as opposed to pursuit within the Ascension Island court system ○ AIG may also use other options with an international focus if they are required – including port States, Regional Fisheries Management Organisations (RFMOs) and INTERPOL |
| Reliance on remote methods of surveillance: | Use all possible methods post-after detection to identify a vessel, |

⁴ Dark refers to a vessel not broadcasting, or manipulating or interfering with its Automatic Information System (AIS) device

⁵ Flag States are required to control their own vessels and prevent them conducting illegal activity.

⁶ Flag States to date have binding domestic legislation on their vessels that prohibit illegal fishing within the maritime area of another states jurisdiction.

| | |
|--|--|
| <ul style="list-style-type: none"> Remote vessel identification is more challenging than from surface or aerial-sightings | <p>and pursue through the flag State routes listed above.</p> <ul style="list-style-type: none"> Create redundancy in the remote sensing data available by: <ul style="list-style-type: none"> Using all possible sources in coordination to increase their effectiveness Ensuring AIG, with BBSIH support, are aware of any new sources/capabilities that may increase effectiveness – see Technology section Ensure when engaged with flag States that sensitive or tactically advantageous capability is not divulged Ensure, where cost effective and logistically feasible, options for maritime support are pursued to complement remote detection – such as sightings from local or transiting vessel traffic |
| <p>Creating the right political dynamic to enable international mechanisms are effective</p> | <ul style="list-style-type: none"> Develop dialogue with key flag States and maintain these relationships AIG may, if proportionate, pursue an IUU listing of a vessel at ICCAT⁷, and such a process could “embarrass” the flag State into action AIG will need to be compliant with its own ICCAT obligations (see objective 4) to secure the political leverage it needs to (see Objective 4) pursue the above approach |

⁷ IUU listing is a process by which a vessel is “listed” for illegal activity. The consequences of such a listing are the vessel cannot be authorised to fish for tuna in the Atlantic, restrictions on support activities available to the vessel and entry to ports.

The BBSIH has five functions, which are detailed in full at Annex 4. The table below summarises the support and advice AIG has requested from the BBSIH.

| BBSIH Function | BBSIH Advise and Support |
|---|---|
| Function 1 Surveillance Function 2 Intelligence Management | <ul style="list-style-type: none"> • Carry out a risk assessment of IUU threats to attempt to predict where and when the IUU risk is highest - this in turn will be used to target resources in accordance with the ILRBE approach • Provide proportionate, year-round, baseline surveillance to assure AIG and MPA stakeholders that vigilance is maintained, and any new or emerging threats are identified • Use the most applicable surveillance methodology to counter/ identify the IUU threat (see Surveillance section) • Increase surveillance activity beyond baseline, including the use of commercial surveillance, to detect IUU if the risk assessment deems it necessary (ILRBE approach) • AIG will undertake operational decision making, with BBSIH advice |
| Function 3 International Enforcement Liaison | <ul style="list-style-type: none"> • Provide advice and support to AIG before any international dialogue is opened, undertake that dialogue on their behalf |
| Function 4 Enforcement Capacity Building | <ul style="list-style-type: none"> • Provide briefing material on surveillance activities for use by AIG's Fisheries Protection Officers (FPOs) |
| Function 5 Assistance with International Obligations | <ul style="list-style-type: none"> • Assist AIG in complying with its ICCAT compliance and enforcement data reporting obligations • Provide updates to AIG on changes to measures or data reporting requirements at ICCAT • Provide advice on the implementation of ICCAT compliance and enforcement measures |

4.1 Compliance and Enforcement Principles

In exercising its prosecution and enforcement powers, AIG will act with proportionality, consistency and accountability as outlined in its sanctions policy in Annex 5.

| | |
|-----------------|--|
| Proportionality | AIG aims to make those subject to relevant legislation comply through: <ul style="list-style-type: none"> • Changing behaviour • Deterrence • Limitation of financial gain from non-compliance • Reassurance to those who are compliant • Proportionality to the nature of any offence and or the harm caused |
|-----------------|--|

| | |
|----------------|--|
| | AIG will publish a sanctions policy statement under this compliance and enforcement strategy explaining how it will apply these sanctions in a fair and proportionate way (Annex 5) |
| Accountability | AIG is accountable for its regulatory activity and must be able to justify enforcement activities and decisions. |
| Consistency | All enforcement and compliance activities of AIG will be consistent with the legislation in place, and the powers conferred under it. The compliance and enforcement outcomes that AIG pursue will be consistent with other similar circumstances, and will be recorded in auditable format. FPOs will be trained to exercise powers they have under relevant legislation appropriately and in accordance with this compliance and enforcement strategy. |
| Transparency | AIG will publish summary compliance and enforcement statistics to ensure transparency. |

4.2 Surveillance

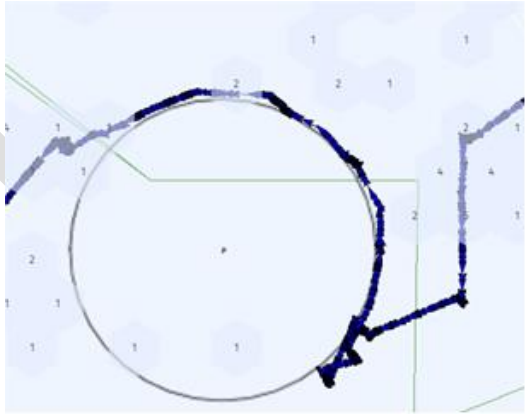
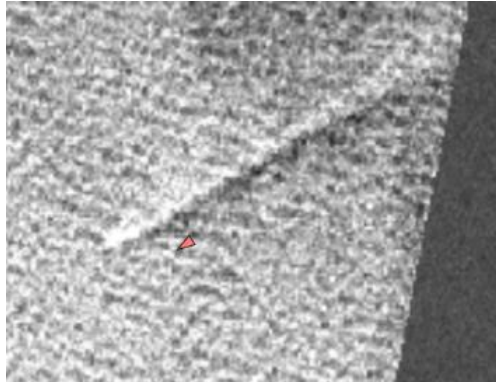
Baseline surveillance is intended to maintain a minimum level of surveillance activity, all year round and involve:

- Routine monitoring of AIS using automated techniques such as Automatic Behaviour Monitoring (ABM) and expert manual analysts
- Requesting or checking other remote sensing data (typically satellite imagery) when intelligence indicates it is necessary
- Use of free-to-use satellite imagery where possible and feasible


The intensity of surveillance will be increased above baseline if required due to:

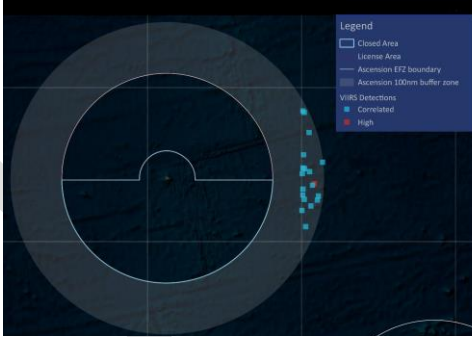
- Identification of the need in the risk profile, or
- In response to graded intelligence

Surveillance above the baseline will be primarily through the use of commercial satellite imagery. A summary of the “remote detection” capabilities and methods currently available to AIG, directly or through the support of the BBSIH, is provided below.

| Surveillance Methodology | Capability/Purpose | Examples |
|---|--|--|
| <p>Automatic Information System (AIS)</p> | <p>Original purpose is as a collision avoidance system, transmitted on VHF (Very High Frequency) radio. Transmissions are received terrestrially or by satellite:</p> <ul style="list-style-type: none"> • Forms a key part of baseline surveillance • Used for general situational awareness but does not give a “complete picture” due to possible manipulation, ranging from deliberate misrepresentation of data (position, identity etc.) to turning the equipment off – termed a “dark vessel”. Not universally required by the flag State • AIS provides vessel identity, position, course and speed • Mandated by the International Maritime Organization (IMO) and legally required on cargo vessels above 330 Gross Registered Tonnage (GRT) and passenger vessels • Commonly used by fishing vessels but not generally mandatory⁸ • Multiple sources and systems available for its analysis, both manually and automatically |  |
| <p>Synthetic Aperture Radar (SAR)</p> | <p>Satellite based radar system that can detect vessels at sea that are not on AIS (dark vessels):</p> <ul style="list-style-type: none"> • Provides a more complete picture when used in conjunction with AIS to detect “dark vessels” • Primary remote surveillance methodology used to detect dark vessels • It can be tasked: <ul style="list-style-type: none"> ○ Commercially during periods of high IUU risk – through the BBSIH ○ Reactively on an intelligence led basis through EMSA (European Maritime Safety Agency) • High coverage available (swath sizes up to 250km wide) • Not affected by cloud cover or time of day, but sea state can |  |

⁸ [EU Legislation](#) – requires mandatory use of AIS on fishing vessels over 15m. Other State application is low.

| Surveillance Methodology | Capability/Purpose | Examples |
|---|--|---|
| | <p>impact confidence of detections</p> <ul style="list-style-type: none"> • Vessel size can be inferred from detection and location or other verifying detections can inform interpretation, but other than this, provides no information on dark vessel identity • In addition to commercial/EMSA sources, open source, free-to-user SAR data is available through Sentinel-1 supplied by ESA (European Space Agency) however the resolution of the Sentinel-1 data is low. | |
| <p>Electro-Optical Satellite Imagery (EO)</p> | <p>Optical imagery can be thought of as acting like a camera:</p> <ul style="list-style-type: none"> • Current use is intelligence-led and coordinated with sources of possible detection – i.e. attempts to visually verify a SAR detection <p>Open source Sentinel-2 imagery is freely available through ESA but the resolution of the Sentinel 2 imagery is relatively low</p> <ul style="list-style-type: none"> • Resolution is not adequate for vessel type or identity verification • Even with the highest resolution commercial optical imagery, it is not possible to verify vessel identity • Very weather and sea state dependent • The footprint (swath) of the imagery is very small |  |

| Surveillance Methodology | Capability/Purpose | Examples |
|---|--|---|
| Visible Infrared Imaging Radiometer (VIIRS) | <p>Satellite with capability to detect light emissions from the Earth's surface. It is used for vessel detection through development of a VIIRS Boat Detection (VBD) tool</p> <ul style="list-style-type: none"> • Used as a verification of SAR detections • Original purpose was metrological • VBD developed by NOAA⁹ and UK-OTs included through BBSIH collaboration with National Oceanographic and Atmospheric Agency (NOAA) in the US • An atmospheric phenomenon called the South Atlantic Anomaly interferes significantly with the VIIRS sensor over Ascension Island, significantly compromising its effectiveness in this area |  |

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⁹ National Oceanographic and Atmospheric Administration in the US

4.3 Compliance and Surveillance Statistics

The FAO¹⁰ defines the surveillance component of Monitoring Control and Surveillance (MCS) as:

“The degree and types of observation required to maintain compliance with the regulatory controls imposed on fishing activities”

The BBSIH and AIG have developed metrics to measure the following:

- The amount of surveillance conducted over the MPA and the area immediately adjacent to it
- Surveillance results expressed in terms of relative levels of compliance with relevant legislation
- Surveillance results expressed in terms of suspected and confirmed non-compliant activity
- The actions taken and their outcomes with respect to all confirmed non-compliant activity

AIG understand and accept that some offences will inevitably go unsolved and it is therefore important when developing statistics to distinguish between confirmed and suspected non-compliance.

| Confirmed non-compliance | Suspected non-compliance |
|---|---|
| <p>Cases where:</p> <ul style="list-style-type: none"> • Sufficient evidence against an identifiable entity (vessel, owners etc.) has been obtained to allow AIG to apply an option under its sanctions policy • That sanction has been applied in accordance with Objective 2 of this strategy | <p>Cases where:</p> <ul style="list-style-type: none"> • An objective assessment of evidence and/or intelligence indicates that an offence has been committed but: <ul style="list-style-type: none"> ○ The evidence is insufficient to apply a sanctions option, in so much as it does not pass the public interest and/or evidence tests with the Code for Crown Prosecutors ○ The offending entity cannot be identified, so a sanctions option is not possible |

In line with Objective 1, AIG will take all possible investigatory steps in cases of suspected non-compliance to establish the facts of the matter. Any investigation will be undertaken in a manner proportionate to the relative severity of the suspected alleged offence.

In accordance with its compliance and enforcement principles, AIG will publish annual¹¹ high level summary statistics. These will be adapted from the four metrics

¹⁰ Food and Agriculture Organisation of the UN

¹¹ First published March 2021

listed above and made appropriate for the public domain. BBSIH will provide AIG with a monthly activity report for internal use only that will inform this public facing report.

These metrics are intended to provide assurances to MPA stakeholders of the effectiveness of surveillance and the follow up actions undertaken by both AIG and BBSIH. Full details of the metrics are provided in Annex 6.

4.4 Technology

AIG understands:

- That new technology has the potential to transform compliance and enforcement in large-scale, remote MPAs, but it is essential that any technology used is fit for purpose
- That the technology landscape is constantly evolving as new technologies are developed and become more affordable
- The bespoke Blue Belt Compliance and Enforcement Technology Roadmap for Ascension Island sets out the new technologies that may be available to support compliance and enforcement in the short, medium and longer term
- AIG will look for opportunities to trial the use of new technologies identified within the Roadmap as and where appropriate, and will welcome the opportunity to work in collaboration with partners on this
- The BBSIH will assist AIG will engagement with other organisations working on feasible technology trials or new surveillance methodologies on an *ad hoc* basis

4.5 Reviewing the Strategy

AIG consider it essential that this strategy is adequately reviewed and evaluated in March 2021, with the intention to adopt a longer-term strategy which sits within the five-year time frame of the MPA Management Plan.

When assessing the effectiveness of the strategy, the review will consider the following:

- Compliance and surveillance statistics
- Requirements and impact of investigatory steps taken
- The sanctions options which were required or applied, and whether these were both proportionate to the offence (s) committed and sufficient enough to deter further offences
- In the context of both the above and Objective 3 – are there additional or new approaches that could be considered
- Whether, through implementation, legislative gaps or omissions have emerged
- Opportunities to improve evidence gathering/handling
- A detailed review of the aims and actions set out in Annex 3
- A full review of risk assessments

Annex 1 MPA Management Plan underpinning the Compliance and Enforcement Strategy

The MPA Management Plan sets out AIG’s vision for the MPA:

“The Ascension Island Marine Protected Area will safeguard a unique natural ecosystem at the heart of the Atlantic Ocean. It will be a beacon of marine conservation, research and sustainable management that is a source of pride for the people of Ascension and a valuable resource for future generations, both locally and globally”

The Management Plan has a set of strategic and supporting objectives:

| Strategic Objectives – 20-25 year timeframe | Supporting Objective – 5 year timeframe |
|--|--|
| <ol style="list-style-type: none"> 1. <i>To Conserve Ascension Island’s marine biodiversity, habitats and ecological functions for long-term ecosystem health</i> 2. <i>To promote the sustainable development of socio-economic activities that are compatible with protection of the marine environment</i> 3. <i>To promote scientific research and share knowledge about Ascension Island’s marine biodiversity in order to encourage support for marine conservation locally and internationally</i> | <p><i>To achieve effective governance and management of the MPA that is transparent and underpinned by sustainable financial and human resources</i></p> |

A series of operational objectives, in the form of actions, sit below these strategic and supporting objectives, which in turn have management actions. Operational objective 1b is of relevance to the compliance and enforcement strategy:

| | |
|---|---|
| Operational objective 1b – Surveillance, compliance and enforcement regime effectively tackles all known threats to offshore ecosystems | |
| Action | <i>Establish an effective MCS and enforcement regime to prevent IUU fishing within the MPA</i> |
| Outcomes | <ul style="list-style-type: none"> • Effective detection of suspect vessels and enforcement via ICCAT deters IUU fishing in EEZ and prevents the unsustainable harvest of target and bycatch species • Procedures for dealing with MCS intelligence are clear to the MPA management authority and strictly followed • Evidence is collected to the required standard to achieve effective enforcement • <i>International collaboration is utilised to pursue possible IUU should it occur</i> |
| Targets | Year 1: Surveillance system in operation based on risk assessment, staff trained, system for monitoring effectiveness |

| | |
|--|--|
| | <p>established</p> <p>Year 5: All cases of suspect vessels in the MPA investigated and appropriate enforcement action taken. Evidence collection is always of the standard required for prosecution. Failures in investigations and enforcement are analysed and used to refine procedures and capture lessons learnt</p> |
|--|--|

The management plan also presents a threat analysis which identifies IUU fishing as a threat posed to the MPA.

Annex 2 Relevant Legislation

Legislation relevant¹² to the enforcement of or prevention of IUU within the MPA is as follows:

- St Helena and Dependencies (Territorial Sea) Order 1989 – *established Ascension’s territorial sea (12nm from baselines)*
- Fishery Limits Order 1978 – *Established Ascension’s Exclusive Fishery Zone (EFZ)*
- National Protected Areas Ordinance 2003 (as amended 2019) – *Provides Governor with authority to designate MPAs through an order. 2019 amendment extended these powers to the 200nm limit*
- National Protected Areas Ordinance 2003 – *Provides powers to permit establishment of national parks, nature reserves, sanctuaries and area of historic interest*
- The Fisheries (Conservation and Management) Ordinance 2015 – *Director of Fisheries and FPOs are designated under this legislation and enforcement powers are granted in Part VI. Contains IUU offences. Grants powers to issue Orders providing for restrictions of other activities, including transshipment. Also includes historic powers to grant commercial fishing licenses*
- Fishery Limits (Licensing of fishing) (Offshore Zone) Order 2015 - *Issued under the Fisheries (Conservation and Management) Ordinance 2015. Prohibits fishing beyond Ascension’s territorial waters without a license. Enforceable by FPOs.*
- Fishery Limits (Licensing of Transshipment) Order 2015 – *Issued under the Fisheries (Conservation and Management) Ordinance 2015. Prohibits transshipment without authorisation. Enforceable by FPOs.*
- Wildlife Protection Ordinance 2013 (as amended 2016) – *Prohibits the taking of certain wildlife species or products within fishing limits. Includes a number of relevant pelagic shark and other species. 2016 amendment extended the species list*
- Ascension Island declared its EEZ in 1978 (Check legislative reference with Dee) Ascension had an Exclusive Fisheries Zone (EFZ) by Proclamation dated 30 June 1977 (LN 16/1977), but this became an Exclusive Economic Zone (EEZ) by Proclamation dated 13 July 2017 (LN 2/2017) when the

¹² Note – AIG will update this annex as new or amended legislation comes into force

documents were filed with the UN by the FCO Maritime Policy Unit on 27/8/2019.

- ICCAT Conservation Management Measures (CMM) where relevant to IUU threat

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Annex 3 – Strategy Objectives – Actions, Outputs and Outcomes

| Strategy Aim and Objectives | Actions (A) | Owner | Output | Outcome | Targets (if applicable) |
|---|--|----------------------------------|--|--|---|
| <p>Aim : To achieve full compliance with relevant legislation within the Ascension MPA</p> | <p>Implement ILRBE approach</p> | <p>BBSIH (functions 1 and 2)</p> | <p>Ascension strategic risk assessment – March (1.1)</p> | <p>Improved understanding of level and nature of IUU risk across the year, which is used to inform tasking</p> | <p>May 2020, Quarterly, ad hoc and annual review</p> |
| | | | <p>Ascension vessel threat profiles (1.2)</p> | <p>Detailed understanding of different threats to the MPA, best detection methodology, tactical information and background information</p> | <p>Oct 2020, Quarterly, ad hoc and annual review</p> |
| | | | <p>2020 surveillance plan (1.3)</p> | <p>BBSIH and AIG surveillance is tasked in a timely fashion and targeted at IUU risk</p> | <p>May 2020 and Quarterly review</p> |
| | | | <p>Baseline surveillance year round (1.4)</p> | <p>Ongoing surveillance at sustainable level is conducted by BBSIH</p> | <p>100% annual coverage from baseline surveillance</p> |
| | | | <p>Commercial surveillance or other assets deployed due to high IUU risk (1.5)</p> | <p>Key risk periods are covered by additional/more intense surveillance if required ILBRE approach ensures appropriate use of resources</p> | <p>Compliance statistics – public and AIG version Monthly reporting</p> |
| | | | <p>Monthly reporting (1.6)</p> | <p>Summary surveillance statistics and narrative is provided across BB UK-OTs</p> | <p>Monthly report to each UK-OT</p> |
| | | | <p>Compliance statistics (1.7) – four categories above</p> | <p>Accountability and assurances to AIG and MPA stakeholders</p> | <p>Reported to AIG May – published report</p> |
| <p>Objective 1: All instances of suspected non-compliance will be recorded as intelligence. Where, where possible,</p> | <p>All incoming intelligence is received, researched and disseminated by</p> | <p>BBSIH (functions 2 and 3)</p> | <p>Generate IRs for all relevant instances Captured in compliance statistics</p> | <p>AIG are fully aware of the on-going intelligence picture in the territory</p> | <p>100% of all instances generate an IR Monthly reporting</p> |

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| that intelligence will be developed by verification with additional information from relevant sources | BBSIH analysts | | (1.8) | | and compliance statistics |
| | | | IRs include research and additional information “added value” | All opportunities to improve the intelligence picture are taken | Where applicable IR researched (target 100%) |
| Objective 2: When a confirmed non-compliance event occurs, it will result in a proportionate sanction or outcome being applied | | AIG | AIG utilises its sanctions options as appropriate (1.9) (captured in 1.7) | Sanctions ensure IUU is dealt with and creates a deterrent against further offences | 100% of instances of confirmed non-compliance result in a sanction |
| | | BBSIH (function 3) | Flag State data is requested (2.0) (captured by 1.7) | Dialogue is established and flag States are aware of their vessels activities Data is secured | Where appropriate flag States requests are made (target 100%) Note data release not with control |
| | | | If cases require, possible prosecutions are requested of flag State (2.1) (captured by 1.7) | IUU is prosecuted and deterrence occurs | No target – not within control |
| Objective 3: AIG will endeavour to bring illegal activity under control if detected | | AIG and BBSIH (function 3) | Actions 1.9, 2.0 and 2.1 Captured by 1.7 and 1.8 | Case specific IUU if occurring is reduced through sanctions | No target |
| Objective 4: AIG will meet its international obligations as a coastal state member of ICCAT | | AIG and BBSIH (function 5) | Data reporting obligations incorporated into surveillance plan (see 1.3) | AIG have clarity of what is required | All requirements are captured May 2020 |
| | | | AIG are notified by BBSIH in advance of a reporting obligation (2.2 – implemented by 1.3) | AIG fulfil its ICCAT reporting obligations | 100% compliance with measures within the surveillance plan On-going through |

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|--|--|--|---|---|---|
| | | | | | the year |
| | | | AIG are made aware of changes to ICCAT requirements by BBSIH (2.3) | Compliance is sustained through regulatory change | May – 2020 – consult and report prior to ICCAT IMM meeting Nov 2020 consult and report prior to ICCAT Commission meeting |
| Objective 5: AIG will ensure that its FPOs are adequately briefed on the surveillance methodologies, and associated follow up procedures required for instances of non-compliance | | BBSIH (function 4) | Briefing materials are developed on surveillance and intel functions (2.4) | AIG have improved understanding of the compliance picture relevant to IUU within the MPA | July 2020 |
| | | | AIG FPOs utilise the material during or pre-deployment (2.5) | AIG have improved understanding of the compliance picture relevant to IUU within the MPA | AIG Conservation Department FPOs briefed (target 100%) – AIG control Other FPOs as required |
| Objective 6: AIG will maintain an awareness of new surveillance technologies applicable to this strategy, and, if opportunities arise, look to use them | | BBSIH (function 1) and strategy specific | BBSIH provide “watching brief” to AIG on new surveillance methodologies (2.6) | Surveillance effectiveness and coverage and detection is constantly improved | On-going through the year Report in March 2021 |
| | | | BBSIH and AIG conduct technology trial if feasible (2.7) | Possibilities to improve surveillance effectiveness and coverage and detection is constantly improved | <i>Ad hoc</i> |

Annex 4 BBSIH Functions

1. **Surveillance** - Provision of surveillance capability for counter IUU or UK-OT domestic enforcement purposes. Surveillance, maritime domain awareness and intelligence analysis capacity and capability – focused on the wider EEZ IUU threat – inclusive of centrally held commercial surveillance contract
2. **Intelligence management** – Provision of centralised intelligence management including analysis, “added value” and dissemination to the UK-OTs to inform the tasking of their assets
3. **International enforcement liaison** – coordination of international liaison related to any follow on investigations or actions related to possible/confirmed instances of IUU
4. **Enforcement capacity building** – provision of enforcement training and advice/guidance linked to IUU threats or domestic enforcement
5. **Assistance with international obligations** – Provision of assistance to UK-OTs on MCS reporting obligations under international treaties and obligations – focused on RMFO requirements
6. **Compliance data management** – collation and reporting of surveillance metrics and measurements of non-compliance across all the Blue Belt UK-OTs

Annex 5 – AIG Sanctions Policy

Ascension Island Government (AIG) - Sanctions Policy

AIG aims to make sure those regulated that vessels and all people and businesses associated with them take appropriate action to comply with relevant legislation. It will pursue prosecutions by either AIG or relevant flag State in order to:

- Punish and deter offenders.
- Reassure those complying with the regulations
- Reassure MPA stakeholders that effective enforcement is being undertaken

Objectives of AIG Enforcement

AIG sanctions are (where possible) aimed at:

- i. Changing behaviour
- ii. Deterrence
- iii. Limitation or financial gain gained from non-compliance
- iv. Reassurance of those who are compliant
- v. Proportionality to the nature of any offence and or the harm caused
- vi. In cases of serious at the first instance, deliberate or repeated non-compliance AIG will pursue prosecution and other serious sanctions

Principles of Regulation

All the enforcement and compliance activities of AIG will be consistent with legislation and the powers conferred under it. The compliance and enforcement outcomes that AIG will pursue will be consistent with other similar circumstances.

The training of FPOs will include sections developing the skills to apply their enforcement powers in this manner.

Enforcement Options

AIG has the following enforcement options:

- No further action (NFA) – in cases of inadequate evidence (including no identity of the offender) or the level of offending is very low and it is not proportionate to pursue it any further
- Verbal warning - FPOs will inform regulated persons what needs to be done or changed to comply with legislation of a code of conduct
- Advisory letters – advisory letter may be sent to the regulated persons where there is evidence of a breach of the legislation or a code of conduct to remind them of the need to obey the legislation
- Official written warning letters – where on completion of an investigation there is evidence that an offence has been committed, an official warning letter may be sent to the regulated person, outlining the alleged offending, when it

occurred and what regulation (s) were breached. It will also set out that it is a matter which could be subject to prosecution should the same behaviours occur in the future.

- Prosecution within AIG jurisdiction – where appropriate, and following application of the tests in the Code for Crown Prosecutors, AIG may initiate prosecution proceedings. When instituting criminal proceedings, AIG will select the most appropriate charges, which may include those under general criminal law
- Prosecution by relevant flag State – where appropriate, AIG may request a prosecution is undertaken by the flag State of a vessel under its domestic legislation for an alleged offence committed within the Ascension EEZ
- IUU listing at ICCAT – where appropriate AIG, as part of the UK-OT delegation, may pursue an IUU listing of a vessel for an offence committed within the Ascension EEZ at ICCAT

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Annex 6 Compliance Metrics

| Surveillance methodology | Quantification of surveillance methodology | Measure of compliant activity | Measure of suspected non-compliance | Actions taken due to confirmed non-compliance |
|--|---|--|--|--|
| AIS analysis | Analyst daily check ¹³ | Check demonstrates that all activity is compliant– separated into: <ul style="list-style-type: none"> Fishing activity Transhipment Bunkering¹⁴ <i>Reportable - Number of days of compliant activity</i> | Cases of insufficient evidence or offender identification to apply sanctions <i>Reportable - Number of IRs¹⁵</i> | <i>Reportable – Sanctions statistics</i> <i>Reportable – number of flag States requests and responses</i> |
| Satellite Imagery (all types) | <ul style="list-style-type: none"> No. of days imagery was taken No. of frames Imagery coverage (km²) | Imagery yielded no detections of possible fishing vessels <i>Reportable – No. of “clear” images</i> | “High risk” ¹⁶ detection identified within the imagery <i>Reportable – No. of high risk detections and mapping</i> | |
| A written narrative giving context on the metrics will be provided for the public audience | | | | |

¹³ Defined as a check undertaken by BBSIH analyst of an individual UKOT in a 24hr review period (weekdays and weekends if urgently required)

¹⁴ Transhipment (transferring of fish from fishing vessel to cargo vessel) and bunkering (supplying fishing vessels with fuel) are key support activities of fishing activity and are also within the relevant legislation of this strategy

¹⁵ Intelligence Reports – all non-compliance is recorded in this format as standard procedure

¹⁶ Means a detection where the vessel size, derived from the detection itself, equates to that of a fishing vessel and other factors such as location increase the risk narrative of the detection

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