

### **Questions Ian asked:**

1. Do you have a list of what fishing ships are allowed to operate in Mauritania waters?
2. Do you have a list of which ships are tied to which FMFO plants?
3. Is there a government website of any sort that lists which FMFO plants have ever been fined or cited for air or water pollution violations?
4. Can you tell me of any worker deaths at any FMFO plants in Mauritania?

### **Highlights**

- Turkish fishing operations in Mauritania are driven by the growing demand for fishmeal from major companies like **KILIÇ** and **Gümüşdoğa**. A newly surfaced video tracks the **ILHAN YILMAZ-1** vessel's activities over the past seven years ([here](#) and [here](#)), highlighting sustained Turkish presence. **KILIÇ** relies on Mauritania for 42,000 tons of fishmeal annually, contracting multiple Turkish vessels to secure supply, while **Gümüşdoğa** has ramped up its fishmeal production from 200 to 550 tons per day. In 2023, 28 Mauritanian fishmeal factories received export approval to China despite a Fisheries Ministry ban on key fish species, with Turkish vessels playing a central role in the supply chain.
- The ship **ILHAN YILMAZ** (IMO number 8685765), the second in the **YELMAZ** family, is chartered by the Turkish company **ZAK FISHING FOOD**, which operates in the fishmeal industry. The ship is owned by **YELMAZ KARDESLER BALICILIK**. The ship has made 550 fishing trips, 447 port dockings, and 1 docking with another ship. Ship tracking [here](#). Ownership info [here](#).
- **MAH EL TURK - SARL**, which produces fishmeal, has admitted to using species of fish that the government has banned for fishmeal production, including **Sardinella** (Yaboy). Scientists say that *Sardinella* is being overfished and the government has banned its use in fishmeal, however the laws are poorly enforced and often disregarded by FMFO companies. Mr. Zakia states there is corruption in the government allowing these foreign companies to skirt the law.

### **Full Conversation - Attachments: [here](#) - Chat [here](#)**

[1/3/25, 11:24:53 AM] Ian Urbina

<attached: [00000007-VIDEO-2025-01-03-11-24-53.mp4](#)>

[1/3/25, 11:25:21 AM] ~ Mansour Boidaha

<attached: [00000008-VIDEO-2025-01-03-11-25-21.mp4](#)>

[1/3/25, 11:25:22 AM] ~ Mansour Boidaha

في المياه الموريتانية حيث قامت ب 745 رحلة صيد و ILHAN YILMAZ -1 460 فيديو يظهر نشاط السفينة التركية رسو في الميناء طيلة 7 سنوات ونيف بمعدل 94 رحلة صيد بحمولتها البالغة 455 طن مع العلم انها قد تدخل أحيانا بأقل من حمولتها.

Translation: A video shows the activity of the Turkish ship \*ILHAN YILMAZ-1\* in Mauritanian waters, where it conducted 745 fishing trips and 460 port dockings over more than seven years, averaging 94 fishing trips with a cargo capacity of 455 tons. It is worth noting that sometimes it enters with less than its full capacity.

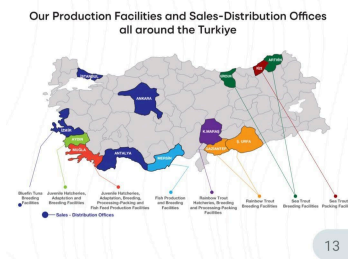
[1/3/25, 11:25:22 AM] ~ Mansour Boidaha

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[1/3/25, 11:25:23 AM] ~ Mansour Boidaha

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[1/3/25, 11:25:23 AM] ~ Mansour Boidaha

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[1/3/25, 11:25:23 AM] ~ Mansour Boidaha

التركية لديها 13 مصنع ومزرعة سمك في تركيا و 5 فروع في العالم تنتج حوالي 40.000 طن من اجود انواع KILIÇ شركة السمك واغلاها لكن هذه الشركة تقوم على أساس واحد إذا توقف يتوقف كل شيء ألا وهو دقيق السمك الموريتاني الذي يعد الركيزة الأساسية لهذه الشركة وهي تتفاخر بمرافقها لانتاج هذه المادة في موريتانيا وهذا يفسر سر وجود اسطول صيد تركي دائم في بلادنا ينهب ثرواتنا السمكية ويعرض مستقبل أجيالنا القادمة الى الخطر.

Translation: The Turkish company \*KILIÇ\* operates 13 fish farms and factories in Turkey and has five branches worldwide, producing around 40,000 tons of high-quality and expensive fish. However, this company relies on a single foundation—Mauritanian fishmeal—which is its essential pillar. The company even prides itself on its facilities for producing this material in Mauritania. This explains the constant presence of a Turkish fishing fleet in our country, depleting our marine resources and endangering the future of coming generations.

[1/3/25, 11:26:16 AM] ~ Mansour Boidaha

<attached: [00000014-PHOTO-2025-01-03-11-26-16.jpg](#)>

Investments in Mauritania to secure fishmeal and fish oil supplies

September 1, 2015



Dr Hayri Deniz, projects and foreign investments manager in Kiliç Holding

[1/3/25, 11:26:16 AM] ~ Mansour Boidaha

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[1/3/25, 11:26:17 AM] ~ Mansour Boidaha

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الولايات المتحدة وألبانيا وجهتان جذابتان للاستثمار

وتجده شركة كيليچ للمأكولات البحرية إلى إنتاج منتجات جديدة استجابة لتوجهات المجتمعات المستهدفة، الأمر الذي منحها حضوراً أقوى في السوق المحلية، ولكنها في السنوات القليلة الماضية كانت تسعى أيضاً إلى اتباع استراتيجية خارجية أكثر عدوانية، وهي تنظر بالاعتماد إلى ألبانيا والمغرب، واستكشاف الإمكانيات في الولايات المتحدة، ومؤخراً، أصدرت الشركة في موريتانيا شركة لإنتاج دقيق السمك وزيت السمك. وهذا من شأنه أن يؤمن إمدادات دقيق السمك وزيت السمك التي تحتاجها الشركة لإنتاج 120 ألف طن من أعلاف الأسماك من مصنعها لأعلاف الأسماك، ويقول الدكتور دينيز إن التكامل الرأسي الكامل له العديد من المزايا، فمن الآن تنتج أصابعها وأعلاف الأسماك والمواد الخام اللازمة لأعلاف الأسماك والمنتجات النهائية التي يبيعها وللأفكار البحرية، وفوارب الأعلاف، EPS، بأنفسها، بل إننا نصنع صناديق بأنفسنا، والميزة تكمن في الأسعار، فالشراء من داخل المجموعة أرخص من الشراء من الخارج، وخاصة لأننا كيان للغاية لدرجة أن تكاليف الوحدة من ما تنتجه هي نفسها أو حتى أقل من تكاليف الشركة المصنعة

Translation:

The United States and Albania are attractive investment destinations.

\*KILIÇ\* Seafood is responding to changing social trends by producing new products, which has strengthened its presence in the local market.

However, in recent years, the company has also pursued a more aggressive foreign strategy. It is closely eyeing Albania and Morocco, while exploring opportunities in the United States. Recently, the company acquired a fishmeal and fish oil production facility in Mauritania. This

move secures the fishmeal and fish oil supplies needed to produce 120,000 tons of fish feed at its factories.

Dr. Deniz explains that vertical integration offers numerous advantages. "We now produce our fish feed, raw materials for feed, fish, and final products, along with sea cages, feed boats, and even EPS ourselves. We even make our boxes. The advantage lies in the prices. Purchasing within the group is cheaper than buying externally, especially since we are so large that the unit costs of what we produce are the same or even lower than those of external manufacturers."

[1/3/25, 11:26:39 AM] ~ Mansour Boidaha

شركة في موريتانيا لإنتاج دقيق وزيت السمك الذي تحتاجه لإنتاج 120.000 طن من KILIÇ في عام 2015 اشترت شركة الأعلاف لتغذية مزارع السمك ومن المعروف أن أعلاف السمك تتكون من نسبة 35% دقيق سمك و الباقي مخلفات زراعية

وقد ترتفع هذه النسبة مع بعض الأنواع اللاحمة أي ان الشركة تحتاج الى 42.000 طن دقيق سمك سنويا من موريتانيا المصدر الوحيد لها ولانتاج هذه الكمية ستحتاج إلى طحن من 168.000 الى 210.000 طن من الاسماك الطازجة (باعتبار أنه لانتاج 1 طن دقيق سمك يجب طحن من 4 الى 5 طن سمك طازج) وهذا سيحتاج منها التعاقد مع 4 الى 5 سفن صيد تركية عاملة في موريتانيا تشتري حملتها بالكامل.

Translation: In 2015, \*KILIÇ\* purchased a company in Mauritania to produce the fishmeal and fish oil needed to manufacture 120,000 tons of feed for its fish farms. Fish feed typically consists of 35% fishmeal, with the rest being agricultural byproducts, though this percentage can be higher for carnivorous species. This means the company requires 42,000 tons of fishmeal annually from Mauritania—its sole source. To produce this amount, it must process between 168,000 and 210,000 tons of fresh fish, given that producing one ton of fishmeal requires four to five tons of fresh fish. As a result, the company needs to contract four to five Turkish fishing vessels operating in Mauritania, purchasing their entire catch.

[1/3/25, 11:27:20 AM] ~ Mansour Boidaha

التركية وهي إحدى الشركات الرائدة في مجال تربية الأحياء المائية و الاستزراع السمكي قامت هذه Gümüşdoğa شركة الشركة بشراء مصنع لانتاج دقيق وزيت السمك في موريتانيا بقدرة معالجة 200 طن من الأسماك يوميا ثم عملت على رفع الكمية الى 550 طن يوميا ولا يزال المواطن الموريتاني يبحث عن سمكة يسد بها جوعه.

Translation: The Turkish company \*Gümüşdoğa\*, a leading firm in aquaculture and fish farming, purchased a fishmeal and fish oil production plant in Mauritania with an initial processing capacity of 200 tons of fish per day. It later increased this capacity to 550 tons per day, while the Mauritanian people continue to struggle to find fish to feed themselves.

[1/3/25, 11:28:44 AM] ~ Mansour Boidaha



مصنع لدقيق وزيت السمك في موريتانيا حصلت على شهادات تصدير الى الصين 2023 لكن ضمن شروط وهي ان يتم 28 وان تطحن السمكة كاملة رغم ان وزارة الصيد (OBO يابوي) و Sardine و Sardine إنتاج دقيق السمك من اسماء Sardine pilchardus حرمت هذه الأنواع وسمحت فقط بنسبة من وبالتالي ان شاء الله سوف نقدم أسماء هذه الشركات وارتباطها بسفن الصيد التركية المغذي الرئيسي لمصانع دقيق السمك.

Translation: **\*\*Important\*\***

In 2023, 28 fishmeal and fish oil factories in Mauritania received export certificates to China under specific conditions: the fishmeal must be produced from Sardine, Sardinella (Yaboy), and OBO, with whole fish being processed. However, the Ministry of Fisheries had banned the use of these species, allowing only a limited percentage of Sardine pilchardus.

We will soon reveal the names of these companies and their connections to Turkish fishing vessels, which are the primary suppliers for these fishmeal factories.

[1/3/25, 11:28:57 AM] ~ Mansour Boidaha

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Toujours concernant les solutions, le ministre a évoqué l'interdiction de l'usage d'espèces consommées en Mauritanie, telles que le chinchard, sardinelle ronde ou encore le maquereau, pour en faire de la farine de poisson. En plus obligation est faite aux navires de pêche côtière d'avoir un dispositif de conservation du pélagique capturé. La mesure limite la production de la farine aux déchets, rebus et poissons entier impropres à la consommation humaine.

Translation:

**Chinchard, sardinelle ronde, or mackerel** are used to produce fishmeal. These species are often processed into fishmeal due to their abundance and nutritional value, making them key raw materials in the production of fishmeal and fish oil for the aquaculture industry.

[1/3/25, 11:28:57 AM] ~ Mansour Boidaha

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| 产品信息        | Description        | 产品用途  | 原料                          |
|-------------|--------------------|-------|-----------------------------|
| commodities |                    | Usage | Species/ Raw material       |
| 4           | Fish meal/Fish oil | Feed  | Whole fish, sardinella, Obo |
| 5           | Fish meal          | Feed  | Whole fish, sardinella, Obo |
| 6           | Fish meal          | Feed  | Whole fish, sardinella, Obo |
| 7           | Fish meal          | Feed  | Whole fish, sardinella, Obo |
| 8           | Fish meal/Fish oil | Feed  | Whole fish, sardinella, Obo |
| 9           | Fish meal          | Feed  | Whole fish, sardinella, Obo |
| 10          | Fish meal/Fish oil | Feed  | Whole fish, sardinella, Obo |
| 11          | Fish meal/Fish oil | Feed  | Whole fish, sardinella, Obo |

[1/3/25, 11:28:57 AM] ~ Mansour Boidaha

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[1/3/25, 11:29:46 AM] Ian Urbina

Thanks for all these. Rapha is going to gather them all up, machine translate, and see what they say and whether we can use their information in the encyclopedia that I sent to you, Monsour (Is that correct for your first name?) And then once she has gone thru the material, we will come back at you with a memo where we will likely want you to check that we have translated and understood these items correctly and accurately

[1/3/25, 11:32:51 AM] ~ Mansour Boidaha

Ok, my name is Mansour Boidaha

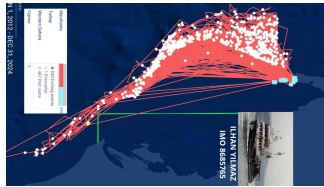
[1/3/25, 11:36:35 AM] ~ Mansour Boidaha

الطول 42 متر العرض 12 متر YELMAZ الثانية ضمن عائلة IMO الرمز 8685765 ILHAN YILMAZ السفينة التركية تعمل في مجال صناعة ZAK FISHING FOOD سعة الحمولة 401 طن قوة المحرك 2572 حصان المساجر YELMAZ (الصورة) مالك السفينة Zeynel Abidin KAYMAK دقيق السمك ورئيس مجلس اداراتها KARDESLER BALICILIK IMROP تشغل ايضا زوارق صيد تقليدي سنغالية كما يظهر تحقيق اعده معهد KARDESLER BALICILIK السفينة قامت بعدد 550 رحلة صيد و 447 رسو في الميناء و 1 مسافنة مع سفينة اخري

Translation: The ship *ILHAN YILMAZ* (IMO number 8685765), the second in the *YELMAZ* family, is 42 meters long, 12 meters wide, with a cargo capacity of 401 tons and an engine power of 2,572 horsepower. It is chartered by the Turkish company **ZAK FISHING FOOD**, which operates in the fishmeal industry. The chairman of the board is **Zeynel Abidin KAYMAK**(pictured), and the ship is owned by **YELMAZ KARDESLER BALICILIK**. It also operates traditional Senegalese fishing boats, as shown in an investigation conducted by the **IMROP** Institute. The ship has made 550 fishing trips, 447 port dockings, and 1 docking with another ship.

[1/3/25, 11:36:48 AM] ~ Mansour Boidaha

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[1/3/25, 11:36:48 AM] ~ Mansour Boidaha

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[1/3/25, 11:36:48 AM] ~ Mansour Boidaha

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|    |               |     |       |     |       |                  |
|----|---------------|-----|-------|-----|-------|------------------|
| 1  | IRKAD 6       | Tun | 37.87 | 395 | phago | IRKAD 6          |
| 2  | MARCO GARIBAY | Tun | 44.0  | 514 | phago | IRKAD 6          |
| 3  | ILHAN YILMAZ  | Tun | 41.0  | 401 | phago | ZAK FISHING FOOD |
| 4  | ILHAN YILMAZ  | Tun | 41.0  | 401 | phago | ZAK FISHING FOOD |
| 5  | TURKEYLMAZ    | Tun | 41.0  | 502 | phago | IRKAD 6          |
| 6  | IRKAD 6       | Tun | 41.0  | 514 | phago | IRKAD 6          |
| 7  | IRKAD 6       | Tun | 41.0  | 514 | phago | IRKAD 6          |
| 8  | IRKAD 6       | Tun | 41.0  | 514 | phago | IRKAD 6          |
| 9  | IRKAD 6       | Tun | 41.0  | 514 | phago | IRKAD 6          |
| 10 | IRKAD 6       | Tun | 41.0  | 514 | phago | IRKAD 6          |
| 11 | IRKAD 6       | Tun | 41.0  | 514 | phago | IRKAD 6          |

[1/3/25, 11:38:43 AM] ~ Mansour Boidaha

لصناعة دقيق السمك تقر بإستعمالها لانواع من السمك منعت الحكومة إستعمالها في MAH EL TURK - SARL شركة او (يابوي) هذا الاستهتار بالقانون الموريتاني لم يكن ليحدث لولا فساد القائمين على هذا Sardinella إنتاج دقيق السمك ومنها وحددت حالة المخزون منها ( Sardinella ) القطاع لقد دقت الجهات العلمية ناقوس الخطر على بعض انواع السمك ومنها بأنها تتعرض لصيد مفرط و بعد ان اصدرت الوزارة المكلفة تعليماتها بمنع توجيه هذه الأنواع الى مصانع دقيق السمك وحددت عقوبات للمخالفين الا اننا نري تراخي كبير في تطبيق هذه الاجراءات مما سمح للاحتيبي بالدوس على القانون.

Translation: The company MAH EL TURK - SARL, which produces fishmeal, has admitted to using species of fish that the government has banned for fishmeal production, including Sardinella (Yaboy). This disregard for Mauritanian law would not have occurred if it weren't for the corruption within the sector. Scientific bodies have raised alarms about certain fish species, including Sardinella, highlighting that they are being overfished. Despite the Ministry's instructions to prohibit these species from being sent to fishmeal factories and the penalties set for violators, there has been significant laxity in enforcing these measures, allowing foreign entities to disregard the law.

[1/3/25, 11:38:55 AM] ~ Mansour Boidaha

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[1/3/25, 11:38:55 AM] ~ Mansour Boidaha

<attached: [00000032-PHOTO-2025-01-03-11-38-55.jpg](#)>

c. Sardinelle ronde :  
Les débarquements de cette espèce ont connu une rupture de quelques mois notamment durant les mois d'avril et mai. Ce n'est qu'en juin que cette espèce est réapparue dans les captures sachant que les mois de juillet et août représentent toujours la période de son abondance en Mauritanie. L'absence de cette espèce dans les captures durant les mois cités ci-dessus est due à la baisse de l'activité de pêche pélagique durant la période mais aussi la faible abondance observée depuis quelque temps.  
L'équipe de FIP a échantillonné plus de 3200 tonnes de cette espèce pêchée majoritairement par les bateaux. Plus de 1900 individus ont été mesurés. Il est important de rappeler que la transformation de cette espèce en farine est interdite par le gouvernement mauritanien, elle est réservée à la consommation humaine ou à l'exportation. Néanmoins, des quantités de cette espèce ont été observées au niveau des usines pour la transformation provenant essentiellement de déchets.  
Le poids moyen de cette espèce varie selon les mois entre 408 et 196 g, il est de 261 g. De même les tailles capturées ont varié entre 17 et 39 cm avec un mode de 28 cm comme dans la figure ci-dessous :

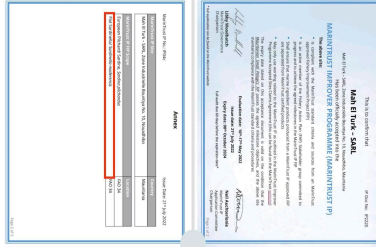
Translation:

The FIP team sampled over 3,200 tons of this species, mostly caught by fishing vessels. More than 1,900 individuals were measured. It is important to note that the transformation of this species into fishmeal is prohibited by the Mauritanian government, as it is reserved for human consumption or export. However,

quantities of this species have been observed at factories for processing, mostly coming from waste. The average weight of this species varies between 408 and 196 grams depending on the month, with an average weight of 261 grams.

[1/3/25, 11:38:55 AM] ~ Mansour Boidaha

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[1/3/25, 11:38:55 AM] ~ Mansour Boidaha

<attached: [00000034-PHOTO-2025-01-03-11-38-55.jpg](#)>

| 生产加工企业名称<br>TradeName<br>TradeName                        | 产品信息<br>Description<br>commodities | 产品用途<br>Usage of | 原料<br>Species/ Raw material |
|-----------------------------------------------------------|------------------------------------|------------------|-----------------------------|
| GMARCO SA                                                 | Fish meal/Fish oil                 | Feed             | Whole fish, sardinella, Obo |
| RIM FISH MEAL                                             | Fish meal                          | Feed             | Whole fish, sardinella, Obo |
| MAH EL TURK-SAKA                                          | Fish meal                          | Feed             | Whole fish, sardinella, Obo |
| ATYFEN                                                    | Fish meal/Fish oil                 | Feed             | Whole fish, sardinella, Obo |
| AFRICA PROTENE                                            | Fish meal                          | Feed             | Whole fish, sardinella, Obo |
| SNG International(Mauritania)/Cherry Street<br>Mauritania | Fish meal/Fish oil                 | Feed             | Whole fish, sardinella, Obo |

[1/3/25, 2:49:15 PM] ~ Mansour Boidaha

نحن عندما نركز على اسطول الصيد التركي فهذا بسبب الاستنزاف الرهيب لهذه السفن لثروتنا السمكية منذ وصولها فقد بلغت الصادر في شهر مايو 2021 حيث FITI Mauritanie حصيلة صيدها السنوية حسب المعطيات الواردة في هذا التقرير ل بلغت حصيلة صيد السفن التركية 477.815 طن معظمها موجه لصناعة زيت ودقيق السمك واذا ما قارناها بحصيلة السفن الصينية البالغة 28.308 طن فما علينا إلا ان نقول رحم الله الحجاج ما اعدله.

Translation: When we focus on the Turkish fishing fleet, it is due to the immense depletion of our marine resources since their arrival. According to the data from the **FITI Mauritanie** report issued in May 2021, the annual catch of Turkish ships reached 477,815 tons, most of which is directed toward the production of fish oil and fishmeal. In comparison, the Chinese fleet's catch amounted to only 28,308 tons. We can only say, "May God have mercy on Al-Hajj, how just he was."

[1/3/25, 2:49:25 PM] ~ Mansour Boidaha

<attached: [00000036-PHOTO-2025-01-03-14-49-25.jpg](#)>



[1/3/25, 2:55:42 PM] ~ Mansour Boidaha

<https://www.facebook.com/share/p/1BJ7GszJnS/>

(Facebook post: An open letter to H.E. Mr. President about the damage of Mocha companies to fish resources and the marine environment)

[1/3/25, 2:56:46 PM] ~ Mansour Boidaha

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<attached: [00000039-PHOTO-2025-01-03-14-56-47.jpg](#)>



Summary: Text of the open letter to the Mauritanian president asking him to shut down fishmeal factories due to “destruction to the public health environment.” FMFO factories take food from the hungry, drive up prices of available fish not used in fishmeal, and the pollution they cause damages the environment and leads to health issues among the local population.

[1/3/25, 2:56:48 PM] ~ Mansour Boidaha

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Summary: The study examines the environmental impact of untreated fishmeal factory discharges in Levrier Bay, Mauritania. Wastewater from these factories significantly alters marine water quality, affecting salinity, oxygen levels, and nutrient concentrations. Key findings include high turbidity and suspended solids, with levels varying by site and factory activity. Chemical and biological oxygen demand (COD/BOD) indicate significant organic pollution, mainly from proteins and oils. Most effluents are biodegradable, except for one site with a high COD/BOD ratio, suggesting non-biodegradable pollutants.

High COD and BOD levels indicate significant organic pollution, primarily from oils and fats in fish processing. Conductivity and turbidity measurements confirm untreated discharge, with suspended solids reaching up to 13,980 mg/L. Compared to other fish processing effluents, Mauritanian wastewater shows high pollutant loads, though some factories reduce BOD by recycling effluents. Effective treatment could lower COD and BOD by over 94%, emphasizing the need for improved wastewater management. High pollution levels contribute to oxygen depletion, ecosystem disruption, and algal proliferation. Without rigorous treatment, these discharges pose a serious threat to marine life. The findings underscore the urgent need for stricter environmental policies and serve as a reference for future research and regulatory decisions on fishmeal production.

~ Mansour Boidaha

Hello, Mr. Ian asked me yesterday for the list of factories in Moka, here is the list of factories in Nouadhibou.

I inform you that the majority of factories in Moka are in Nouadhibou

[Spreadsheet here.](#)

Ian Urbina

Thanks. Do look at the document I sent you. It has every plant in all of Mauritania listed already in it. What we need now are what ships deliver to what plants. We now have a list of all ships licensed to fish in Mauritanian waters. The challenge is figuring out which ships target species that goes toward fishmeal and which ships tie to which plants.

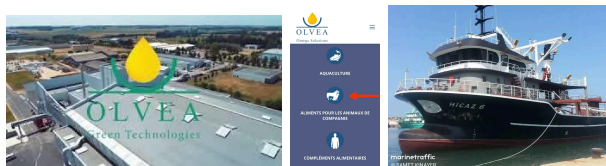
[1/6/25, 1:05:10 PM] ~ Mansour Boidaha:

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En 2021, le sennear turc **HICAZ-6** effectué plus de 100 sorties en mer. Sur les 1000 tonnes de petits pelagiques, il peut capturer plus de 400 tonnes de petits pelagiques. Photo : Capture d'écran du documentaire d'ARTÉ.

Si la farine de poisson de Mauritanie est surtout exportée vers l'Asie, la Chine en tête, l'huile vient en grande partie en Europe. Au premier rang, la compagnie française **OLVEA**, qui a importé de Mauritanie plus de 15.000 tonnes d'huile en 2020. Basée à Fécamp, en Normandie, **OLVEA** dispose également d'une usine à Nouadhibou. L'entreprise affiche 162 millions d'euros de chiffres d'affaires, compte 12 filiales et un effectif de près de 300 personnes dans le monde. **OLVEA** commercialise chaque année 49.000 tonnes d'huile, un tiers provenant de Mauritanie.

Translation: In 2021, the Turkish purse seiner \*HICAZ-6\* carried out more than 100 trips at sea. In a single trip, it could catch over 400 tons of small pelagic fish.

While Mauritanian fish meal is mainly exported to Asia, with China as the leading destination, fish oil is largely shipped to Europe. At the forefront is the French company \*OLVEA\*, which imported over 15,000 tons of oil from Mauritania in 2020. Based in Fécamp, Normandy, \*OLVEA\* also operates a factory in Nouadhibou. The company reports a turnover of €162 million, has 12 subsidiaries, and employs nearly 300 people worldwide. Each year, \*OLVEA\* markets 49,000 tons of oil, with a third sourced from Mauritania.

[1/6/25, 1:05:38 PM] ~ Mansour Boidaha

سفن الصيد التركية هي المزود الأساس لمصانع دقيق وزيت السمك والتي بدورها تزود شركات اجنبية بهذه المواد الفرنسية لصناعة اعلاف الحيوانات (الكلاب والقطط و الخنازير) و اعلاف الاسماك والمكملات الغذائية OLVEA شركة هذه الشركة استوردت سنة 2020 ما حجه 15.000 طن من زيت السمك من موريتانيا اي انها احتاجت إلى (OMEGA 3) طحن 45.000 ألف طن من السمك اي بمعدل 123 طن يوميا وهذه الكمية لا يستطيع توفيرها الا السفن التركية مثل بحمولتها البالغة 400 طن وكما جاء في اللائحة الصادرة عن السلطات الصينية التي تتضمن شروط حصول (HICAZ-6) الشركات الموريتانية على شهادة تصدير للصين فإن هذه الزيوت مصنوعة من اسماك بعضها حظرت الدولة الموريتانية وهذه الأنواع (Sardinella maditernus) و (Sardinella aurita) توجيهه الى مصانع دقيق وزيت السمك ومنها يستهلكها المواطنون لكننا نراها هنا توجه لتغذية الحيوانات و مزارع السمك كما هو مبين على موقع الشركة

Translation:

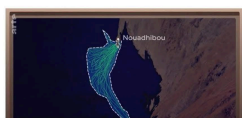
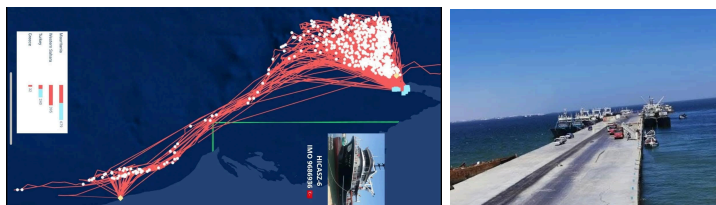
Turkish fishing vessels are the primary suppliers for fish meal and fish oil factories, which in turn provide these materials to foreign companies. The French company OLVEA, which produces animal feed (for dogs, cats, and pigs), fish feed, and dietary supplements (OMEGA-3), imported 15,000 tons of fish oil from Mauritania in 2020. This required processing 45,000 tons of fish, averaging 123 tons per day—a quantity that only Turkish vessels like \*HICAZ-6\*, with its 400-ton capacity, can supply. According to a list issued by Chinese authorities outlining the requirements for Mauritanian companies to obtain an export certificate to China, these oils are made from fish species, some of which Mauritania has banned from being used for fish meal and fish oil production, including \*Sardinella aurita\* and \*Sardinella maditernus\*. These species are consumed by the local population, yet they are being diverted to feed animals and fish farms, as shown on the company's website.

[1/6/25, 1:06:41 PM] ~ Mansour Boidaha:

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En 2021, le sennear turc HICAZ 6 a effectué plus de 100 sorties en mer. En une seule sortie, il peut capturer plus de 400 tonnes de petits pélagiques. Photo : Capture d'écran du documentaire d'ARTE.

Translation: In 2021, the Turkish purse seiner \*HICAZ-6\* carried out more than 100 trips at sea. On a single trip, it could catch over 400 tons of small pelagic fish.

[1/6/25, 1:06:57 PM] ~ Mansour Boidaha

الطول 40 متر العرض 14 متر قوة المحرك 3467 حصان سعة الحمولة 400 IMO 9686936 الرمز HICAZ-6 السفينة Baiyang التابعة بدورها لعملاق الاستزراع السمكي الصيني SUNRISE طن هي سفينة صيد تركية المستأجر شركة للصحيفة ليندا حيث قامت السفينة RTE هذه السفينة تم ذكرها في الوثائقي الفرنسي على قناة Investment Group في سنة 2021 بعدد 102 رحلة صيد بحمولة تصل الى 400 طن اي بمعدل رحلتين في الاسبوع الشركة الصينية HICAZ-6 ميناء خاصا في نواذيبو وتشغل SUNRISE المشغلة لديها مصنع دقيق سمك يبلغ انتاج الشركة من السمك 50.000 طن تمتلك صودرت من 5 Bis 20 سفينة صيد بطول 40 متر تم بناء مصنع الشركة وملحقاته ومينائها على قطع ارضية في منطقة مواطنين في عهد الرئيس السابق والوالى ولد الديس وكنت احد المتضررين حيث صودرت قطعتنا الارضية بمساحة 400 متر مربع

Translation: The fishing vessel \*HICAZ-6\* (IMO 9686936) is a Turkish fishing vessel measuring 40 meters in length and 14 meters in width, with an engine power of 3,467 horsepower and a cargo capacity of 400 tons. It is leased by \*SUNRISE\*, a company owned by the Chinese aquaculture giant \*Baiyang Investment Group\*. The vessel was mentioned in a French documentary on \*RTE\* by journalist \*Linda\*. In 2021, \*HICAZ-6\* carried out 102 fishing trips, each with a 400-ton capacity, averaging two trips per week. The Chinese operating company runs a fish meal factory with an annual fish production of 50,000 tons. \*SUNRISE\* also owns a private port in Nouadhibou and operates 20 fishing vessels, each 40 meters long. The company's factory, its facilities, and its port were built on plots of land in the \*Bis 5\* area, which were confiscated from citizens during the tenure of former President \*Ould Abdel Aziz\* and Governor \*Ould El Dih\*. I was among those affected, as our 400-square-meter plot was seized.

وهي اختصار لاسم شركة SOREC ملاحظة: وردت في الوثائق تسمية Sunrise Oceanic Ressources Exploitation Compagny

#### Questions for Zakia org:

- Can you tell me of any worker deaths at any FMFO plants in Mauritania?
- Can you share the spreadsheets in their entirety, not just screenshots?
- You mentioned factories receiving export certificates for exporting banned species – can you share any proof of this? Are you able to prove which specific vessels have violated the ban?
- You mentioned that Mah El Turk-Sarl has admitted to using species of fish that the government has banned for fishmeal production – can you share proof? You mention corruption within the government allowing Mah El Turk-Sarl and other companies to catch banned fish – do you have any evidence?
- You shared an excerpt from a report on banned fish being processed in factories. Can you share the full report?
- You mentioned Baiyang Investment Group's facilities being built on land seized from citizens by the government. Can you share any proof?

Ian Urbina:

Hi there. Thanks for this. Please hold off on sending any new information as we are still going over your original batch. We do not see much in the way of plant specific information in the first wave of materials you sent. There is a lot of useful work and material but it is not what we need in terms of specificity. Let me try to ask you some specific questions about some of those items.

Can you answer these questions specifically:

Can you tell me of any worker deaths at any FMFO plants in Mauritania?

Can you share the spreadsheets in their entirety, not just screenshots?

You mentioned factories receiving export certificates for exporting banned species – can you share any proof of this? Are you able to prove which specific vessels have violated the ban?

You mentioned that Mah El Turk-Sarl has admitted to using species of fish that the government has banned for fishmeal production – can you share proof? You mention corruption within the government allowing Mah El Turk-Sarl and other companies to catch banned fish – do you have any evidence?

You shared an excerpt from a report on banned fish being processed in factories. Can you share the full report?

You mentioned Baiyang Investment Group's facilities being built on land seized from citizens by the government. Can you share any proof?

~ Mansour Boidaha

Thank you very much for the clarification. According to my humble understanding, conducting an investigative work requires collecting all the information related to any search for the truth. From this point of view, I sent you and I still have a lot to send you. Since you have raised specific questions, I will try to answer them, even though I am on vacation outside the country. I will return to work early next week. My sincere regards.

Ian Urbina:

Thanks for help you are providing. And agreed. At the same time we have to be surgical about the use of time and labor and as such we need to focus very specifically on information that we can use and not translate or read through information that we cannot likely use. We want to respect everyone's time. Therefore we are trying to ask very pinpointed questions based on what we know we can use in terms of types of information. Thanks for tackling these questions when you have time (and if need be it can wait until after you are back at your desk and done with vacation)

~ Mansour Boidaha:

Thank you very much for the clarification. I will answer each specific point. On the other hand, I am collecting the largest amount of information from many sources, some of which are governmental and some of which are private sources from members of our organization and

others who sympathize with us. However, obtaining information is very difficult due to a great blackout because the corrupt lobby behind Moka has large financial means and uses influence.

~ Mansour Boidaha:

Report: [Rapport Echantillonnage et suivi des usines de farine\\_Mai\\_décembre 2021](#)

Report [Translated](#).

c. Sardinelle ronde :

Les débarquements de cette espèce ont connu une rupture de quelques mois notamment durant les mois d'avril et mai. Ce n'est qu'en juin que cette espèce est réapparue dans les captures sachant que les mois de juillet et août représentent toujours la période de son abondance en Mauritanie. L'absence de cette espèce dans les captures durant les mois cités ci-dessus est due à la baisse de l'activité de pêche pélagique durant la période mais aussi la faible abondance observée depuis quelque temps.

L'équipe de FIP a échantillonné plus de 3200 tonnes de cette espèce pêchée majoritairement par les bateaux. Plus de 1900 individus ont été mesurés. Il est important de rappeler que la transformation de cette espèce en farine est interdite par le gouvernement mauritanien, elle est réservée à la consommation humaine ou à l'exportation. Néanmoins, des quantités de cette espèce ont été observées au niveau des usines pour la transformation provenant essentiellement de déchets.

Le poids moyen de cette espèce varie selon les mois entre 408 et 196 g, il est de 261 g. De même les tailles capturées ont varié entre 17 et 39 cm avec un mode de 28 cm comme dans la figure ci-dessous :

### Photo Translation: **Round Sardinella:**

Landings of this species experienced a disruption for a few months, particularly in April and May. It only reappeared in catches in June, with July and August traditionally being its peak abundance period in Mauritania. The absence of this species during the aforementioned months is due to the decline in pelagic fishing activity during that period, as well as a recent trend of lower abundance.

The FIP team sampled over 3,200 tons of this species, mostly caught by boats, and measured more than 1,900 individuals. It is important to note that the Mauritanian government prohibits processing this species into fishmeal; it is reserved for human consumption or export. However, some quantities have been observed in processing plants, mainly originating from waste.

The average weight of this species fluctuated between 408 g and 196 g, with an overall average of 261 g. Similarly, captured sizes ranged from 17 to 39 cm, with a mode of 28 cm, as shown in the figure below.

~ Mansour Boidaha:

That paper is from IMROP (Mauritanian Institute for Oceanographic and Fisheries Research) on Fish meal factories and they found the species I was telling you about and the types of fish that is able to be sold in markets for humans and it can be treated in facilities for consumption. In the research paper they found very specific information. IMROP studies and researched 10 thousand tons of different varieties and species of fish in the ocean. They concluded that the fish would be fished by Turkish boats and then taken to the coast to be given to fish meal factories to produce fishmeal.