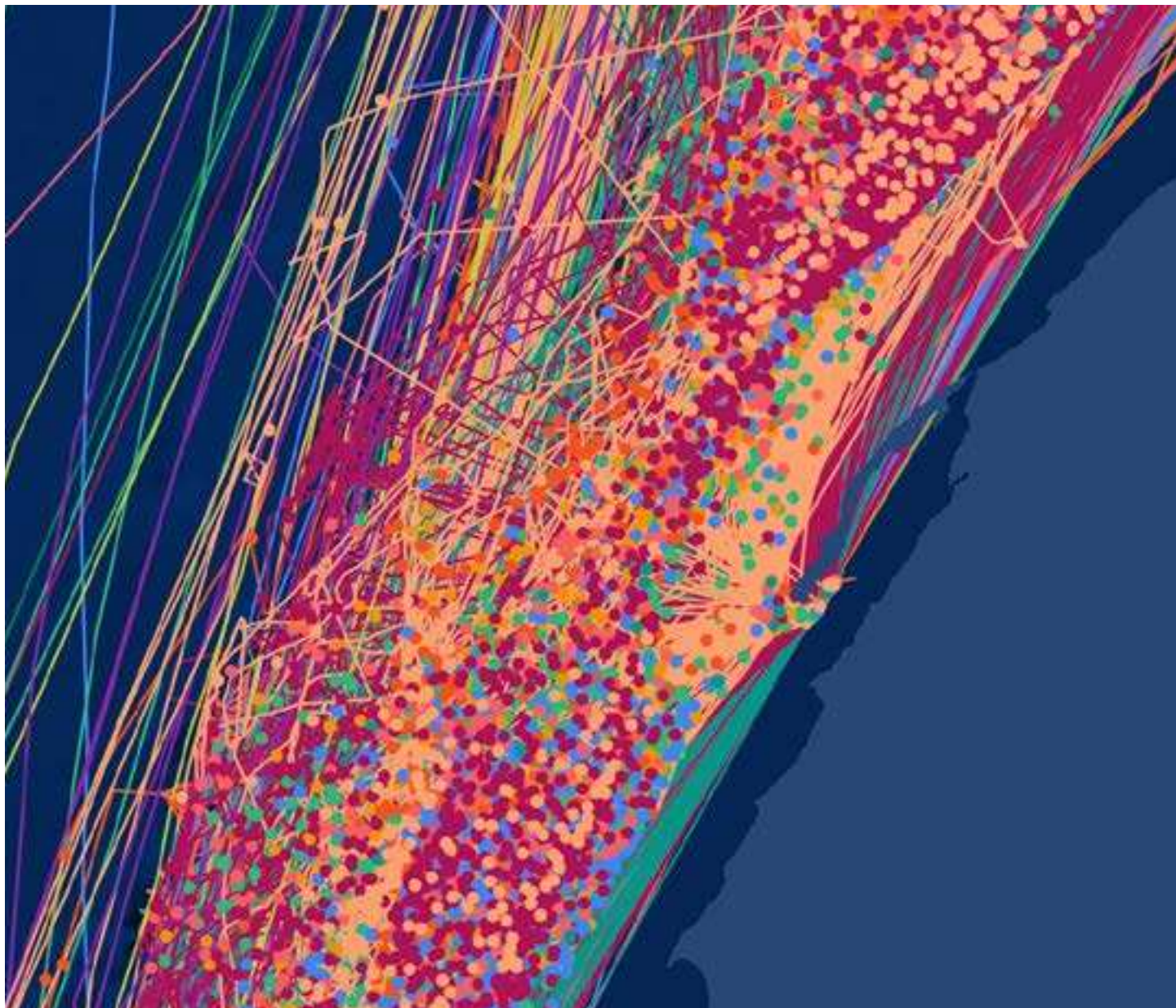




They never stopped fishing

How old Norwegian fishing boats end up in questionable fisheries along the African west coast.

The fishing boat Bømmelbas was sold to Morocco in 2013, where the name was changed to Adrar. The customer – a Moroccan general – put the ship into operation outside occupied Western Sahara. According to Western Sahara Resource Watch, the fishing boat dumped up to 1000 metric tons of dead fish into the sea every year.

Publishing date: April 26, 2023

The report was written with the support of Norad - the Norwegian Agency for Development Cooperation.

ISBN [digital]: 978-82-93941-07-1

Author: Per-Erik Schulze
Design: Marika Andersen
Translation from Norwegian: Benedicte Gyllensten
Published by: The Norwegian Support Committee for Western Sahara, The Norwegian Council for Africa, The Norwegian Society for the Conservation of Nature

Photo: WSRW.org [p.2], Victor radio74/Shipspotting.com [p.4, p.10 -4/5], Ralfszn/Wikimedia Creative Commons [p.7], Elli Lorz [p.8, p.29], Rick Vince/Shipspotting.com [p.10 -1/2/3/9, p. 22], Dirk Septer [p.10 -10/13], David Asprey/Shipspotting.com [p.10 -8/11], Gerolf Drebes/Shipspotting.com [p.10 -6], Clément Tardif/Greenpeace [p.19], Haugesunds Avis [p. 20, facsimile]

Front page: From the fisheries in occupied Western Sahara. Screenshot from Global Fishing Watch.

All tracker maps in the report are screenshots from Global Fishing Watch. www.globalfishing-watch.org/map, accessed 19th of April 2023

www.vest-sahara.no
www.instagram.com/vest_sahara
www.facebook.com/vestsahara
www.twitter.com/vestsahara

www.naturvernforbundet.no
www.instagram.com/naturvern/
www.facebook.com/naturvernforbundet
www.twitter.com/naturvern

www.afrika.no
www.instagram.com/fellesradet_for_afrika/
www.facebook.com/fellesradet/
www.twitter.com/fellesradet



Table of contents

Summary	3
Introduction	4
Risks related to the export of fishing vessels	5
Sustainability status for the fisheries offshore the African west coast	6
Our methods: How we tracked down the vessels	9
Results	12
Which countries are used Norwegian fishing vessels exported to?	12
Where do the former Norwegian fishing vessels go fishing?	12
Norwegian fishing boats outside West Africa	14
Sustainability in fishing with old Norwegian fishing boats outside West Africa	23
Norwegian fisheries policy leads to a large surplus of fishing vessels	24
Are there criteria for the export of discarded Norwegian fishing vessels?	25
How do the fishing boat owners, banks, and insurers for fisheries take responsibility?	27
Recommendations	28
For the government and public support schemes	28
For shipping companies, banks, and insurers	28

Summary

This report reveals that 47 fishing vessels sold from Norway in the last decades have ended up fishing in vulnerable waters along the west coast of Africa.

The extent of this phenomenon has been uncovered by analysing data from obtained from The Norwegian Ship Register. By sorting the thousands of vessels that have been deleted from the registry since 2000, our research narrowed down the material to a pool of 280 of the most interesting, larger fishing boats. These vessels were systematised and verified against tracking logs from the websites of MarineTraffic and Global Fishing Watch, concluding that 47 old Norwegian vessels have found their way to African waters. Our investigation shows

that the export of fishing capacity from Norway to Africa has increased in the last few years.

The fisheries in these waters are often not considered to be sustainably managed, and fishing with large vessels has few benefits for the local population. On top of that, the fisheries in the waters offshore occupied Western Sahara are particularly controversial. Many of the former Norwegian boats go fishing here.



Trønderhav, a boat from Trondheim, was sold to Cameroon in 2015. The photo was taken five years later, in the village of Marin in Spain, while the boat was in dry dock for repairs. Today, the ship is called Wafa 4 and goes fishing outside the coast of Mauritania. Cameroon is considered a red-carded flag of convenience state by the EU [see page 26].

Introduction

«The celebration became a huge party and an impressive number of people showed up to see the bottle of champagne smash on the hull», wrote the daily *Haugesunds Avis*.¹ «A local fairy-tale», the newspaper called the ceremony. A fishing company at Karmøy had received their new and modern fishing vessel, called «Cetus». Cetus wasn't just the name of the new ship; it was also the name of the 30-year-old boat the fishing company sold two years earlier. Old Cetus is now fishing in occupied Western Sahara under Moroccan licences. The sale of the old vessel didn't receive any attention in the local newspapers in Western Norway.

This report tracks down the old, often discarded, Norwegian fishing vessels that have ended up on the west coast of the African continent.

Which ethical and environmental dilemmas arise when we «dump» superfluous fishing vessels in Africa? Previous studies have shown that overcapacity in the Nordic and European industrial fishing fleet creates a risk of ships being moved to other parts of the world where they participate in severe overfishing, for example unregulated, unreported, or illegal fishing (IUU fishing), or extensive fishing of stocks that are already clearly overfished. As a large fishing nation, Norway is a part of this picture. In 2013, a Greenpeace report showed how former Nordic fishing vessels contribute to depleting West African fishing stocks and destroying business opportunities for locals. Six former Norwegian fishing vessels were among the 21 vessels that were mentioned, flagged out to Belize and Morocco. At the same time, Norwegian-owned vessels, companies, and interests participate in some of the same fisheries. In 2010,

The Norwegian Society for the Conservation of Nature revealed how for example fish oil was imported for use in feed manufacturing for Norwegian fish farming. This was done with the help of false application of customs codes obfuscating fact that the oil came from occupied Western Sahara.² In addition to that, ownership and flag changes on fishing vessels can happen so fast that it's hard to know who is fishing what and where.

This report documents that the number of Norwegian vessels sold to fisheries and flag states at risk is much higher than six.

The report shows which Norwegian fishing vessels have been deleted from Norwegian ship registers and transferred to other flags in the last decades. We sum up where the exported fishing vessels are currently active and focus particularly on the coast of West Africa: from Morocco to South Africa, through Western Sahara, Angola, and Namibia, among other countries. West Africa has some of the world's richest fishing grounds and the countries in the region cooperate to strengthen their fisheries management, fisheries control, and the industry itself. This work is supported by Norway, among others. We hope this report will start a discussion about whether fishing is performed ethically and environmentally responsible, and what demands Norwegian fishing boat owners make when they sell their old ships.

The Norwegian Support Committee for Western Sahara, The Norwegian Society for the Conservation of Nature, and The Norwegian Council for Africa collaborated on this report.

Risks related to the export of fishing vessels

All Norwegian fishing vessels of a specific minimum size are registered in the Norwegian ship register and are sailing under a Norwegian flag. Simply put, the flag tells us which country's laws and regulations the vessel adheres to. A ship registered in the Norwegian register has Norwegian rights, access to Norwegian quota rights, and Norwegian maritime responsibilities. Spare fishing boats in Norway are either dismantled at a ship-breaker, transferred to use in other industries, or sold or transferred to another country. When this happens, they must be deleted from the Norwegian ship register. Fishing vessels that will continue to be used must be transferred to another country's ship register. The new flag state controls the fishing boats' rights and responsibilities on the world ocean, no matter where the boat is located.

Many people know the term «flag of convenience» from the cargo ship fleet on the world's oceans. Flag states like these are also found in the fishing fleet, and some have a worse reputation than others, harbouring pirate fishing vessels. This includes several African and Pacific Ocean states, among others, with so-called «open» ship registers. In these countries, it's easy to both register and deregister a vessel quickly. It has been documented that these countries house a series of vessels connected to IUU fishing.

Switching to a flag of convenience or making frequent changes in ownership or flag on fishing vessels is considered suspicious activity among those investigating poaching. A well-managed fishing

vessel should have a clear owner, flag, and identity. It should also have a position transmitter on board so that it's possible to follow the vessel's movement via satellite or the automatic identification system AIS. The fishery inspectors can use these data for cross-check with information about quota rights, fishing regulations, and catch reporting to ensure everything is ok. If anything illegal happens on board, the coastal and ship's flag states can sanction it. Fish pirates frequently make flag and ownership changes, which make the controllers' work harder. Some ships also deliberately go «underground»: sail under a false identity, have fake doubles with the same identity marker, or operate in ghost mode by turning off the signal transmitters. Serious coastal states don't accept this type of behaviour.

In this report, we deliberately avoid discussing the legality of the fishing activity of the vessels we mention, and we don't publish ownership information about the vessels. We do not have information that indicates whether or not the vessels are directly involved in illegal practices. We summarise and share publicly available information about the fishing vessels' movements and flags. Transparency around vessel movements and flags is vital to counteract IUU and predatory overfishing.

Our analysis is based on available tracking information and port logs. We don't know what the vessels have done in periods where they haven't reported their positions via AIS or satellite.

Sustainability status for the fisheries offshore the African west coast

The coast of West Africa is one of the places in the world’s oceans that naturally has huge fishery resources. This is because cold and nutritious sea water flows up and feeds the food chain, from plankton and small types of fish to all larger sea creatures and sea birds. Large schools of mackerel, sardine, and anchovy are readily available and important for local coastal fisheries, business development, jobs, trade, and food. But the same fishery resources have also gained attention from industrial fishing boats and fish pirates who can use trawls and purse seines to harvest more than

a sustainable stock management allows. This fleet profits from the fact that until now, few African states have had the resources to efficiently monitor their economic zones in the coastal waters and perform an efficient fisheries control.³

«They fish everything, large and small, and turn it into fishmeal. It’s going to end, as they are emptying the ocean.»

Norwegian fishing boat owner Odd Karsten Østervold about his industrial fishing colleagues in West Africa.⁴

Fishing stock status in Northwest Africa

The Food and Agriculture Organization of the United Nations (FAO) has a scientific working group that follows the development of large fishing stocks outside Northwest Africa (Senegal-Morocco, including the Canary Islands). In their report from 2022⁵ they state that the fishing is not sustainable:

Species	Stock status
Sardine <i>(Sardina pilchardus)</i>	Uncertainty around whether or not the fishing is sustainable. The average fish size is smaller than before.
Sardinella <i>(Sardinella aurita and S. maderensis)</i>	Overfished. The fishing should be reduced greatly as soon as possible. Sustainable fishing is probably at a level of around 50% of the amount fished today.
Cunene horse mackerel <i>(Trachurus trecae)</i>	Fished at the limit of what is responsible, should not increase.
Atlantic horse mackerel <i>(Trachurus trachurus)</i>	Fished at the limit of what is responsible, should not increase.
Atlantic chub mackerel <i>(Scomber colias)</i>	Currently fished too much; stocks can collapse if this continues.
Anchovy <i>(Engraulis encrasicolus)</i>	Today fishing is opportunistic, probably with too big catches in years with a lot of fish, when more should be kept for spawning.
Bonga <i>(Ethmalosa fimbriata)</i>	Overfished. Fishing pressure must be reduced to keep stocks.

Poaching happens on a large scale, with West Africa being the region in the world where the largest amount of fishery resources is lost to illegal, unregulated, or unreported fishing.⁶ West Africa is also a hot spot for fishing vessels in ghost mode: vessels that go fishing without stating their position.⁷

The goal of the authorities along the west coast of Africa is to tighten its hold on the fishery resources to primarily benefit the African nations themselves. For example, the West Africa Regional Fisheries Program (WARFP, which consists of Cape Verde, Guinea, Guinea-Bissau, Mauritania, Senegal, Sierra Leone, Ghana, and Liberia) says that the fishery sector plays a decisive role in creating and securing a living for their populations and national economies. However, the potential for economic growth and poverty reduction based on fisheries depends on good fisheries management.⁸ They point to overfishing and international actors as problems.

«This situation is on one hand largely due to overexploitation and subsequent depletion of the resources by both legal and illegal operators as a result of low capacity of the countries to sustainably manage the marine fish resources and prevent their overexploitation, particularly by illegal fishing vessels; and on the other hand, the bulk of the legally harvested resources by foreign and offshore vessels yields only a fraction of their value to local economies.»

FAO, 2023⁹

On the other hand, FAO points out that many of the fishery resources harvested are used in fish flour and fish oil production. This is often used in feed for fish farming and animal husbandry globally and does not help strengthen local food security. FAO and many other actors warn that the catch capacity outside West Africa is generally too high and has even increased in the last few years. A report from The Norwegian Support Committee for Western Sahara shows how the Norwegian farming and aquaculture sector uncritically imports raw materials from the region. The committee recommends discontinuing the use of feed that contains marine ingredients from both Western Sahara and Mauritania.¹⁰

Access to fish is important for the people who live along the coast. Coastal fish market in Bakau, Gambia, West Africa.





The fishing industry in occupied Western Sahara is mainly run by Moroccan settlers. The photo is from the capital El Aaiún.

The fisheries in occupied Western Sahara

The Northwest region of Africa, south of the Canary Islands, is considered one of the waters with the most fish in the world. This is also where the territory of Western Sahara, which is occupied by Morocco, is located.

Contrary to international law and the right to self-determination of the Sahrawi people, the Spanish government made an agreement with Mauritania and Morocco in 1975 that the two countries should take over their previous colony. As the right to self-determination of the Sahrawi people was ignored, the UN still considers Western Sahara an unresolved colonial issue.

The southern waters were occupied by Mauritania from 1975 until 1979. When Mauritania left and Morocco occupied the waters, the UN general assembly

requested that Morocco «end the occupation of Western Saharan territory».

The occupation still lasts today.

Part of Spain’s agreement with Morocco/Mauritania was that Spain allowed the invasion on the condition that Spanish fishermen could continue their many hundred-year-old tradition of fishing outside the territory. When Spain was democratized and joined the EU, the Spanish agreement became part of the EU. In 1988, the EU therefore started paying the Moroccan government so that Spanish fishermen could contradict international law and go fishing in the occupied waters. In 2018, the Court of Justice of the EU decided that the

EU fishing in Western Sahara is contrary to EU law and international law and needs to stop, as it has not taken into account the fact that this type of trade agreement can only be entered into with the representative of Western Sahara, the liberation movement Polisario.¹¹ The EU’s political institutions have in practice ignored the court’s conclusions, so a new ruling is expected in 2024.

Parallel to Morocco’s fisheries agreements with the EU and Russia, Morocco has their own private fleet. It’s this fleet that to a large extent uses old Norwegian fishing vessels. On top of this, fishing at times takes place all the way South in Western Sahara, on the border with Mauritania, and with licences issued by the Mauritanian government.

Our methods: How we tracked down the vessels

The starting point of our analysis is the Norwegian Maritime Authority’s dataset which shows ships deleted from the Norwegian ship register. This has been combined with open information about vessel movements. We have now determined the current location of discarded Norwegian fishing vessels by combining data from the following sources:

Norwegian Ordinary Ship Register (NOR):

We requested and received data files from the Norwegian Maritime Authority with insight into selected information about all the fishing vessels deleted from the Norwegian ship register between 2000 and 2023. Registration in NOR is compulsory for all Norwegian vessels over 15 meters and voluntary for smaller fishing and commercial vessels. When a ship is sold for scrap, transferred to a different registry in another nation, dismantled, destroyed, or subject to similar circumstances, it is removed from the NOR database. Documentation is required. The full data set contains about 5600 vessels discarded from the Norwegian fisheries during this period.

MarineTraffic, Professional:

Here, we have gathered details on the ships, including their current position and location history, with a particular emphasis on «Service areas», which provide a summary of the ports, countries, and oceans the ships have visited in the last five years. This is the world’s leading supplier of ship tracking and maritime intelligence, which monitors ship movements through AIS base stations combined with satellite tracking, among other things.

Global Fishing Watch:

We have collected fishing information from here. The GFW has since 2018 offered the first high-resolution maps in the world with information about where commercial fishing activities occur. The service is open to everyone. By combining AIS and satellite tracking with computer learning, the map gives us an easily understandable overview of where, when, and how a vessel is fishing. The map contains tracking data from the last ten years. The GFW aims to support fisheries management and create a culture of obedience to the law.

Press releases and grey literature:

Some vessels have previously been mentioned in the media or reports, on websites, etc.

This is how we have conducted our step-by-step vessel check:

1. The ship overview from NOR has been filtered to remove scrapped and shipwrecked vessels. Vessels under 100 gross tonnage have been left out.
2. The ship’s current or last known name, flag, and active position have been noted down to consider whether it has been active during the period.
3. For every active fishing vessel deleted from the Norwegian ship register since 2000, no matter which country it was flagged out to, we have checked Global Fishing Watch and noted down areas with fishing activity in the last ten years. Where vessel tracking is missing, we have checked port calls and activity areas in the last five years in MarineTraffic.
4. For vessels that seem to have been actively fishing in West Africa – from Morocco in the North to Namibia in the South – we have collected supplementary information by cross-checking all the sources listed above.
5. Extra check: Vessels that were flagged out before 2000 as well as other formerly Norwegian-owned fishing vessels with a Norwegian history which have been discovered as actively fishing outside West Africa through the media or an area search in GFW, without qualifying for criteria 1-4, are included in the overview. This includes for example vessels flagged out as cargo vessels that now seem to be actively fishing.

All the analysis steps have been documented with notes in a data file and a map.¹² Vessel details have been put in an open data attachment for the report which can be found online here: <http://bit.ly/40MEGAI>



Picture 1 Taziazet 1 (ex-Sjannøy), taken in Las Palmas on December 17 2013, shortly after the ship was in dry dock.
Picture 2 Taziazet 2 (ex-Midøy Viking), taken in Las Palmas on November 7 2017.
Picture 3 Akchar 2 (ex-Arnøystein), taken by the inlet to Las Palmas on November 27 2018.

Picture 4 Baobab (ex-Kaagtind), taken on September 12 2019 in Marin, Spain.
Picture 5 Wafa 4 (ex-Trønderhav), taken on July 7 2021 in Marin, Spain, before going into dry dock for reparation.
Picture 6 Helldoden, taken in Las Palmas on December 25 2016.

Picture 7 Senior, taken in Las Palmas on December 18 2016.
Picture 8 Vikingbank, taken in Las Palmas on October 23 2013.
Picture 9 Buland, taken in Las Palmas on March 5 2013.

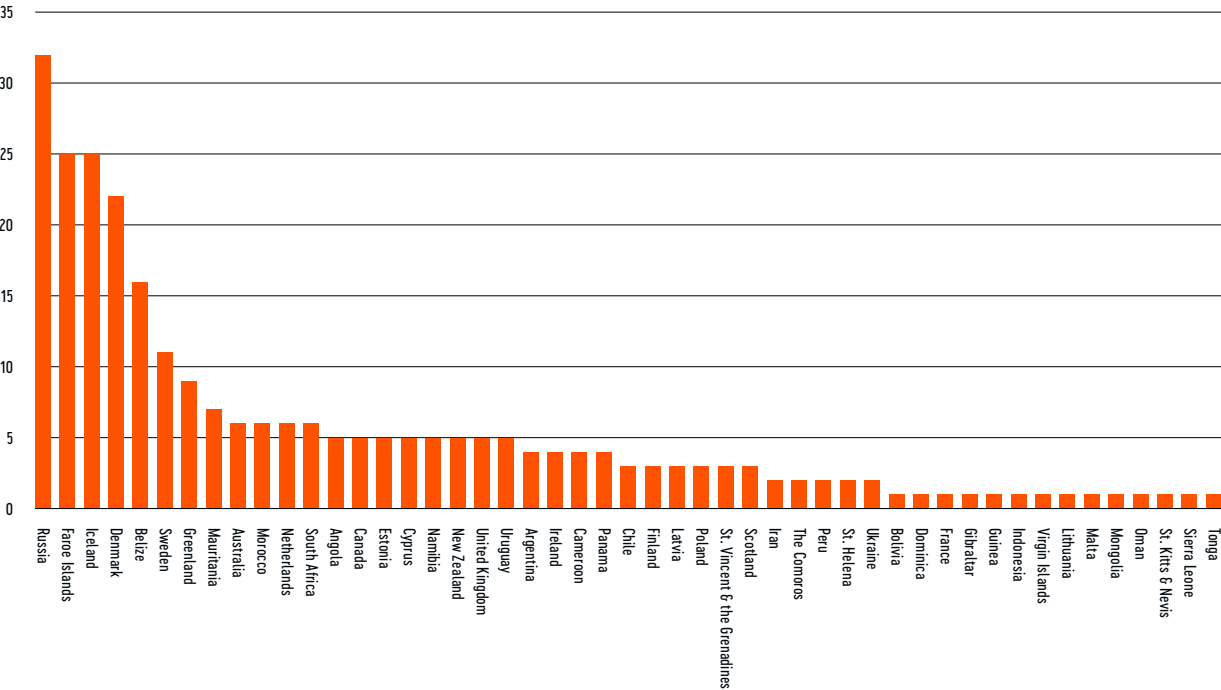
Picture 10 Ocean Maria (ex-Herøyværing), taken in Las Palmas on April 20 2016.
Picture 11 Sunugaal (ex-Solnes/ex-Trifon), taken in Las Palmas on October 23 2013.
Picture 12 Wafa 5 (ex-Radek Senior), taken in Santa Uxía De Ribeira, Spain on September 6, 2022.
Picture 13 Afco 3 (ex-Sea Pearl/ex-Sulehav), taken in Las Palmas on April 20 2018.

Results

Which countries are used Norwegian fishing vessels exported to?

Our mapping shows that in between 2000-2023, over 260 Norwegian fishing vessels over 100 gross tonnage have been reported as exported to different registers/flags in other countries. The majority are sold to a foreign owner. Russia, the Faroe Islands, and Iceland receive most of the exported Norwegian vessels, but a significant amount also ends up in countries like Belize, Angola, Cameroon, Comoros, Morocco, and Namibia. It's worth noting that two of these flag states, Cameroon, and Comoros, have received a so-called «red card» under the EU IUU legislation, with carries sanctions.¹³

Number of fishing vessels flagged out from Norway to different countries from 2000 to 2023.



Where do the former Norwegian fishing vessels go fishing?

When we examine more closely the current fishing grounds of the used vessels exported from Norway to other nations, we notice some clear patterns. For example, the vessels with a Russian flag (see map under), typically go fishing in the Barents Sea and around Svalbard, or in the North Pacific Ocean near Russian waters. Vessels with a flag from Iceland, Greenland, the Faroe Islands, other European countries, and Canada all go fishing in their home areas or European waters. Most have an evident and continuous tracking history and stable home ports. When we look closer at common flags of convenience, Belize in Central America, different African countries, some small island states, and Pacific nations, the picture becomes a lot less clear. Many of these vessels have moved up and down the West and East Africa coast and, at times, to the Southern Ocean. The vessel tracking often contains periods of interruption, and a few of them have disappeared from AIS and satellite tracking after a while. However, we can see from port call statistics that they have remained active after that.



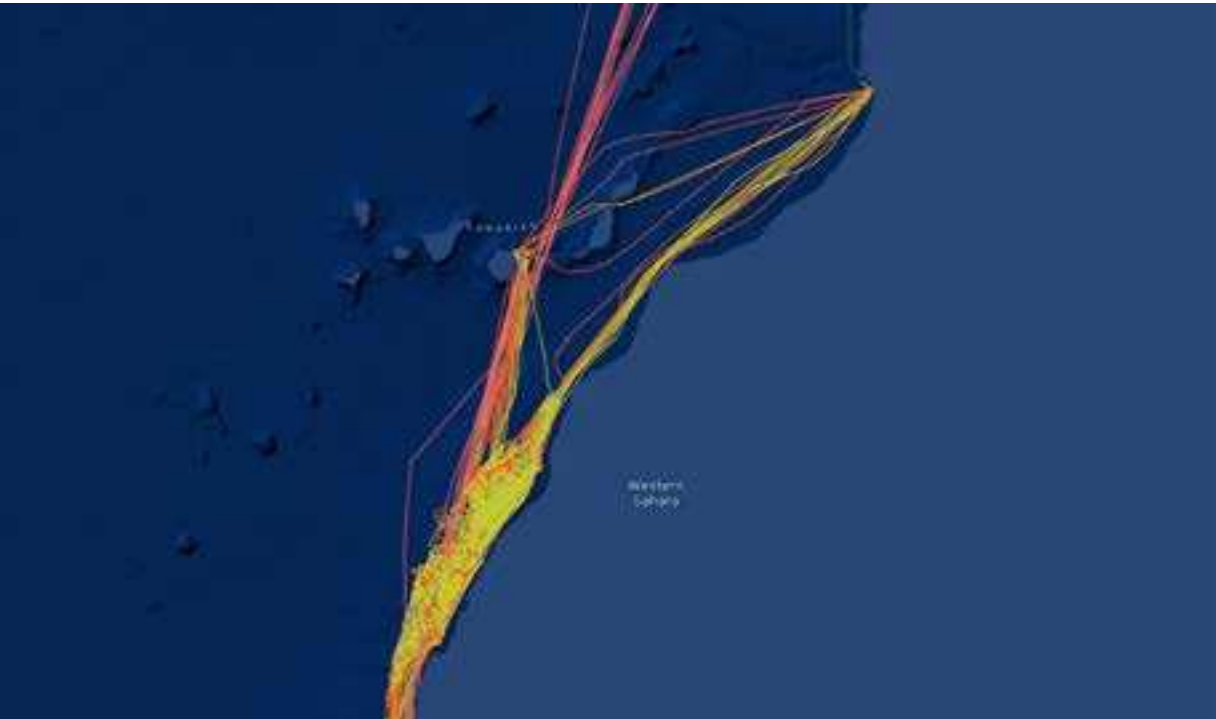
«The Russian fleet»

Tracking of fishing activity over the last ten years for former Norwegian vessels flagged out to Russia. They have gone fishing in the areas of Canada/Greenland/Svalbard/The Norwegian Sea/The Barents Sea, as well as the Northwestern Pacific.



«The Belize fleet»

Tracking of fishing activity over the last ten years for former Norwegian vessels that are now registered under the flag of convenience of Belize in Central America. Most of these ships have gone fishing outside Northwest Africa. See the map zoomed in on West Africa for the same vessels below.

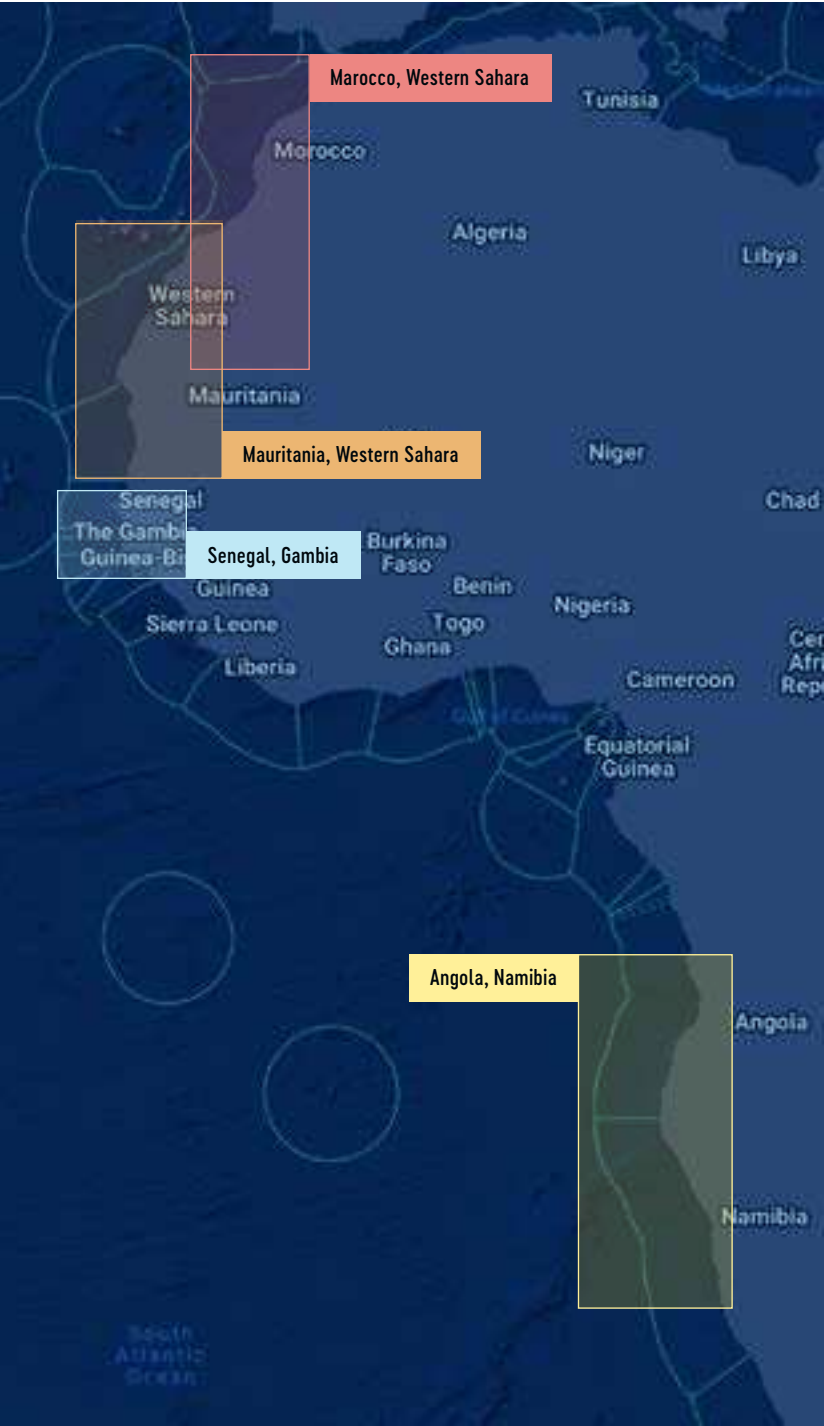


«The Belize fleet» has mostly gone fishing near the coast in West Africa: outside occupied Western Sahara, as well as outside the economic zones of Mauritania and Guinea.

Norwegian fishing boats outside West Africa

Among the over 260 larger fishing vessels that have been flagged out of or exported from Norway in the last 25 years, we have identified 47 vessels that have been fishing outside West Africa or have had port calls in this region in the last decade. A full list with supplementary data for each vessel is available here: <http://bit.ly/40MEGAI>.

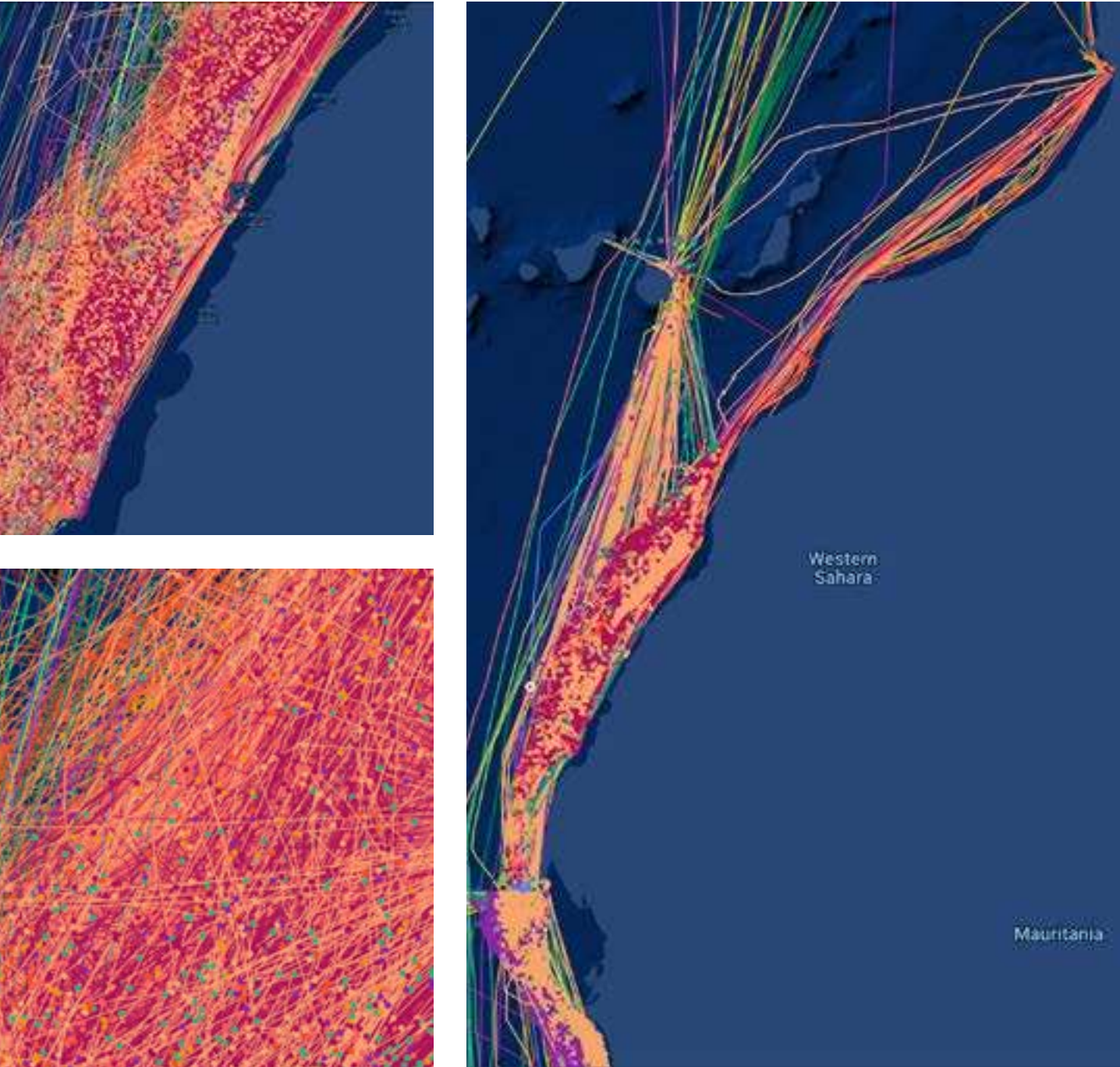
Old ship name	Home port when Norwegian	New ship name
Magnarson	Bergen	Meya
Buland	Bergen	Buland
Ligrunn 2	Bergen	Mayor
Senior	Bodø	Senior
Sævikson	Fosnavåg	Polar
Lønnøy	Haugesund	Lønnoy
Bømmelbas	Haugesund	Assaadi
Vikingbank	Kopervik	Vikingbank
Cetus	Kopervik	Cetus
Skipsholmen	Bergen	Dewas 1
Sjannøy	Bergen	Taziazet 1
Radek Senior	Bergen	Wafa 5
Fruholmen	Bergen	Ozlem
Notbas	Bergen	Akchar 1
Hardhaus II	Bergen	Ernir
Magnarson	Bergen	Cap Blanc
Svanavvag	Egersund	Svanavag (ex Dicada)
Hargo	Florø	Akchar
Sulehav	Florø	Afco 3
Buefjord 1	Florø	Hansome Brothers
Hovden Senior	Florø	Ridaga
Herøyværing	Fosnavåg	Ocean Maria
Midøy Viking	Molde	Taziazet 2
Arneystein	Rørvik	Akchar 2
Trønderhav	Trondheim	Wafa 4
Korsnesfisk	Vardø	Chang Xing1
Midøy Viking	Ålesund	Amelia (ex-Midøy Dakhla)
Kathrin G/Vikingbank	Ålesund	Ayse
Kverven	Ålesund	Afco 2
Inda Explorer	Haugesund	Vardberg (ex-African Viking)
Hellodden/Tofteysund	Svolvær	Hellodden
Antarctic Navigator	Svolvær	Komandor
Kaagtind	Tromsø	Baobab
Fjelldur	Bergen	Ocean Fresh
Kamøyfisk	Bergen	Kamøyfisk
Siglar/Havbas	Bergen	Yahweh
Morten Einar 1	Bergen	Morten Einar
Nordervon	Bergen	Nordervon
Steinsund	Bergen	Steinsund
Edna Synnøve	Brønnøysund	Edna Synnøve
Hasting	Florø	Hasting
Dyrnesvåg	Kristiansund	Dyrnesvag
Straumbas II	Haugesund	Bon Voyage
Solnes	Tromsø	Sunugaal
Ståltor	Tromsø	Harvest Krotoa
Ramoen	Ålesund	Umlobi
Argos Helena	Måløy	Antarctic Discovery



In addition, a handful of vessels either go fishing in other African countries or have left few clear tracks but have a port call history that clearly indicates fishing in the region. We also found some vessels still with Norwegian flags in the same areas. These are not mentioned here.

Tracker maps in Global Fishing Watch show intense fishing activity for the former Norwegian boats. We will present some examples below. You can visit the map for this report in Global Fishing Watch bit.ly/3Z9rqF9 and look closely at the movements of the individual vessels mentioned.

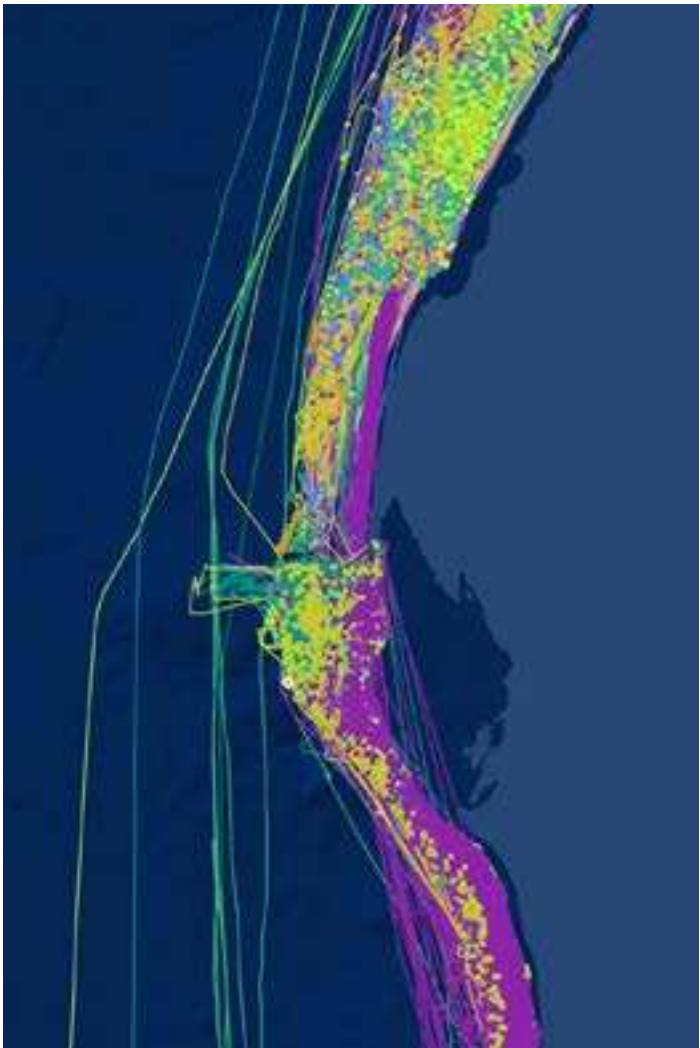
Fishing focused mainly on occupied Western Sahara with some port calls in Morocco, at least eight vessels, in the last ten years.



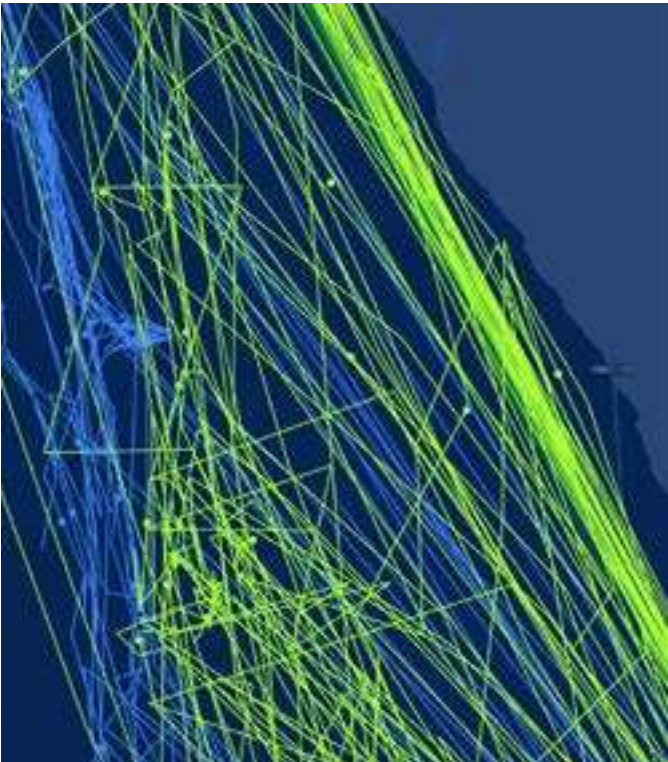
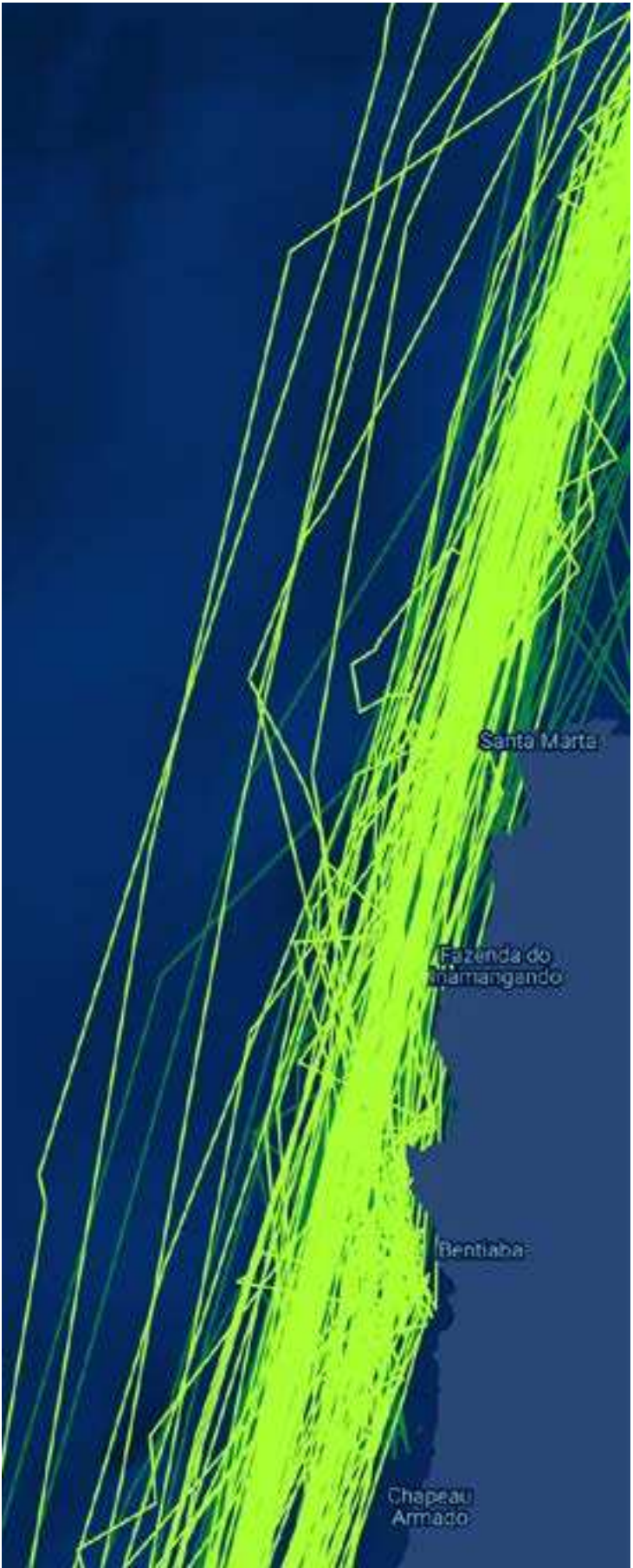
The former Norwegian vessels outside West Africa can easily be sorted into three main groups:

- Fishing focused mainly on occupied Western Sahara with some port calls in Morocco, with at least eight vessels.
- Fishing fleet based in Mauritania, which also takes trips into occupied Western Sahara, at least 23 vessels.
- Fishing in Namibia and Angola, at least seven vessels.

Fishing fleet based in Mauritania, which also takes trips into the waters outside occupied Western Sahara, at least 23 vessels, here represented by ten of them.



Fishing in Namibia and Angola, at least seven vessels, last ten years.



On the tracker maps, we can also see how a dozen vessels that go fishing with Mauritanian licences take trips into seas that without a doubt belong to Western Sahara. Western Sahara is under Moroccan occupation, so the exact maritime boundary between Mauritania and Western Sahara has not been negotiated. Different interpretations of the Law of the sea could theoretically suggest different directions in which this border would go west from the Ras Nouadhibou peninsula. No matter where maritime boundaries are drawn in the future, the former Norwegian fishing vessels are far within the limit of Western Saharan waters.



The phenomenon of taking trips into Western Saharan waters on Mauritanian licences especially applied to the vessels Afco 2, Akchar 2, Akchar, Ayse, Chang Xing 1, Hellodden, Ocean Maria, Ozlem, Sea Pearl, Svanavåg, Taziazet 1 and Trønderhav. The graphics above show the vessels Ozlem (blue) and Akchar (yellow).

Local small boat fishermen outside the coast of Senegal.

Bergen, Florø, Haugesund, and Ålesund are the places in Norway that have flagged out the most fishing vessels to fishing outside the West African coast, along with 12 other Norwegian ports.



Original Norwegian home port for the vessels that have gone fishing in West Africa.



Example 2: “It’s not how things are supposed to be” in Mauritania



The vessels Tazazet 1 and Akchar, both originally from Bergen, seen in the port of Las Palmas on January 7 2022. Usually, they sail outside the coast of Mauritania.

In 2016 and 2017 in *Fiskeribladet*, a Norwegian news outlet for fishing news, readers learned about the part Norwegian-owned company Ocean Fresh Food, which was in the process of building a fishing fleet in Mauritania.¹⁷ Four fishing vessels, called *Tazazet 1*, *Tazazet 2*, *Akchar 1*, and *Akchar 2*, and the factory ship *Ocean Fresh*, which receives and freezes pelagic catch from the fishing vessels, were already in place. All the fishing vessels show up in our research, and all are formerly Norwegian boats. The freezer ship is listed in the Norwegian International Ship Register (NIS).¹⁸ In the media, fishing boat owner Odd Karsten Østervold eagerly points out that it’s unfortunate that fisheries outside West Africa are not sustainable. «*The others ravage wildly and deliver all the fish to make flour that is used for animal feed. This is not sustainable fishing and it’s not how things are supposed to be*», he says. At the same time, he admits potential for improvement in his fishing, to avoid waste and discarding among other things. He also confirms that he is worried that the population in these African countries is not benefiting much from the fishing resources outside their own coasts. Østervold points to Chinese and Turkish companies as the main drivers behind unethical, predatory overfishing.

In 2021, the responsible image of these Norwegian fisheries actors in Africa was ruined.¹⁹ It turns out that the Norwegian-registered freezer vessel *Ocean Fresh* has not even come close to fulfilling its duty of reporting its catch. The Directorate of Fisheries in Norway reported the former Austevoll company *Ocean Fresh Food* for incomplete catch reporting in Mauritania in 2017. *Ocean Fresh Food* supposedly avoided reporting their catch of mainly sardinella, mackerel and horse mackerel from outside Mauritania for around three years. According to the indictment, *Ocean Fresh Food* has received between 28,000 and 30,000 metric tons of fish yearly from other vessels in Mauritania. This was mainly sardinella caught in and outside of Mauritania’s economic zone and territorial waters. In the fall of 2022, the company was found guilty by the Norwegian district court.²⁰ The district attorney appealed the verdict and asked for a larger fine and confiscation of the catch.²¹ The case will appear in the court of appeals in June 2023.²²

Two – or possibly three – of the *Ocean Fresh* ships have also clearly made trips into the waters outside occupied Western Sahara during the period in which they have been fishing under licences from the authorities in neighbouring Mauritania.

Sustainability in fishing with old Norwegian fishing boats outside West Africa

As we have seen, since the turn of the century and until today, 47 Norwegian fishing vessels have been removed from fishing in our own Norwegian waters and ended up in fisheries outside West Africa. The majority of this transfer of fishing capacity has happened in the last ten years, which is after both The Norwegian Society for the Conservation of Nature, Greenpeace and The Norwegian Support Committee for Western Sahara started shining the spotlight on Norwegian interests in these fisheries. All the exported vessels on our list are relatively large, 21-28 meters or larger. By comparison, Norway, which is one of the world’s ten largest fishing nations, with a larger fishing capacity than any African country, currently has about 350 fishing vessels of this size registered in its fisheries. 192 of these have been newly built since 2000.²³ In other words, the fishing capacity transfer from Norway to West African waters is not insignificant. Overfishing has also been reported in the same waters in the same period, and African fisheries management tells stories about extensive poaching and stealing of resources.

Our study has not examined the legality of the fishing activity that these formerly Norwegian vessels take part in outside West Africa. However, new analysis’ by anti-poaching investigators reveals that fishing vessels flagged to countries in Africa or fishing there run the risk of becoming involved in unsustainable fisheries in numerous ways.²⁴ This is the same whether they «flag in» and get local owners to secure fishing rights or go fishing with other countries’ flags of convenience in African or international waters. Trawlers under flags of convenience are generally known to be a group of vessels with a history of illegal fishing.

It’s paradoxical that at the same time as Norway spends a lot of money on the Nansen Ocean Research Programme, which supports African states in their work of ensuring sustainable fishery management, Norwegian companies export fishing capacity and contribute to the opposite of sustainability by introducing an overcapacity with risk of overfishing and poaching in these same

“...bottom trawlers flagged to several African States, with beneficial ownership in a variety of external countries [...], have been documented [...] engaging in high-risk fishing activities in the majority of sub-Saharan African coastal States”

The Norwegian fishing intelligence foundation Trygg Mat Tracking (TMT).²⁵

countries. The Nansen Programme started in 1975 and is the largest and longest-lasting single project in Norwegian fisheries aid. Today, the program covers 32 countries – 27 in Africa and five in Asia. The budget for the five-year-long program period (2017-2022) was 637 million Norwegian kroner.²⁶

It’s also paradoxical that the Nansen Programme conducts ocean research in occupied Western Sahara in cooperation with Moroccan authorities. The Moroccan authorities use the data to enter into fisheries agreements with other nations that are contrary to international law and to move their own fishing population into the area.²⁷ There are no signs of the actors behind the Nansen Programme trying to stimulate cooperation or skills development with the organisation that both the UN and the Court of Justice of the EU consider the political and legal representative of the Sahrawi people. A comprehensive evaluation of the Nansen Programme published in March 2023 neglects to mention the issue.²⁸

A significant part of the Moroccan fleet consists of old Norwegian ships. Our material shows that at least eight vessels flagged out of Norway in the last 20 years have gone fishing in occupied Western Sahara under Moroccan flags. Several other former Norwegian ships under flags like Belize and Mauritania sometimes go fishing in Western Sahara as well.

Norwegian fisheries policy leads to a large surplus of fishing vessels

Are there criteria for the export of discarded Norwegian fishing vessels?

Norwegian governments have regulated fishing in Norway with quotas through many white papers and administrative measures before they opened up the opportunity to combine quotas from several small boats and transfer them to the «most efficient», and usually larger, boats. On paper, this leads to less overcapacity and a more profitable industry, meaning as much fish and income as possible per Norwegian kroner invested and used on equipment and crew. This restructuring of the Norwegian fishing fleet has proceeded with great force in the last decades.²⁹ At one point, it also became possible to trade quotas freely. Large companies could then collect even more quotas on very large vessels.

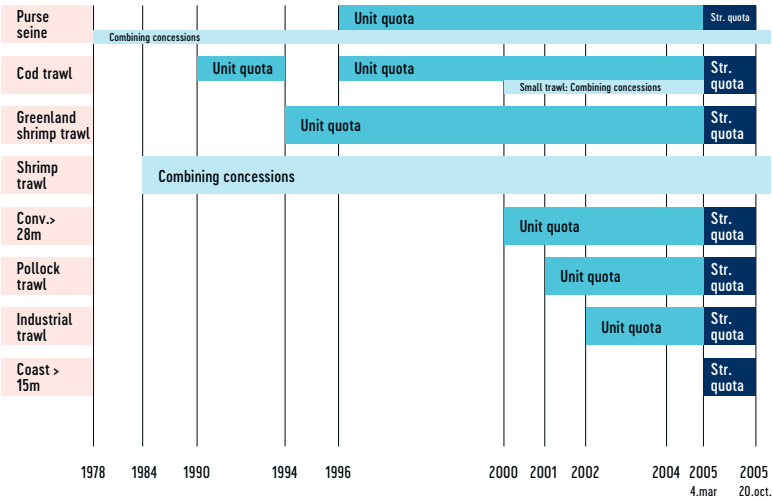
«In Norway, generally speaking, we had open access to our fishery resources until after the herring collapse at the start of the 1970s. In the cod sector the largest paradigm shift, from open access to closed fishing, came when vessel quotas were introduced in the coastal fleet in 1990 [...]

History since then is well known to us now. Vessel quotas and participant regulation created tradeable quotas, and over time also structuring in the form of schemes financed by both the industry and the market.»

NOFIMA³⁰

One condition for combining quotas in Norway, the so-called structural quotas, is that the old boats are entirely removed from the fishery. This means they need to be condemned or exported out of the country.

«The condemnation requirement has been an important instrument for counteracting the export of discarded Norwegian vessels to flags of convenience and illegal, unregulated or unregistered international fishing during a period of large national overcapacity», the Ministry of Trade, Industry and Fisheries writes in a report.³¹



The structural quotas are assigned according to the Marine Resources Act. It does not seem to matter that fishing capacity removed from the fishery in Norway later ends up in other countries. Today, there are very few medium-sized trawlers left in Norway. For example, in the period from 2003 to 2015, the sea-going Norwegian cod trawl fleet was reduced from 76 to 34 vessels.³² Some were condemned and chopped up. Quite a few were sold to Iceland, Russia, and Denmark and are still fishing in the North Atlantic and the Barents Seas. Many are fishing in Africa.

The structural quotas schemes, the way we know them today (with time limits), were implemented in mid-2007, after a few years starting in 2005 with so-called «perpetual quotas»,³³ which were halted by the Supreme Court. It's conspicuous that most of the vessels we found exported to fishing in West Africa after 2000 were registered in 2011 and after, while the export of fishing vessels has been at about the same level the whole period. In other words, the current structural schemes and regulations and/or support schemes and/or other relations within the fishing industry must have made it more attractive to sell old Norwegian vessels for fishing in Africa in the last decade than it was before.

A variety of schemes for combining the Norwegian fishing fleet have been in place from the late 1970s until today, but the development has grown exponentially in the 2000s. Figure from White paper 21 (2006-2007) Structural policy for the fishing fleet.

Building a fishing fleet tailored for capacity and sustainable resource extraction is reported to have been the goal of Norway's condemnation plan and subsequent structural changes. The requirement of scrapping or annihilating fishing vessels has also been an important instrument for counteracting the export of discarded Norwegian vessels to flags of convenience and illegal, unregulated, or unregistered international fishing. In the no longer applicable Norwegian regulation from 2002 about condemnation grants for fishing vessels, it says that «sales to abroad can only be permitted in special cases, and only where this is compatible with Norwegian interests».³⁴ To get permission to export old vessels, the following requirements were to be fulfilled:

«The vessel can only be sold to states that have signed the Agreement of December 4, 1995, about the fulfilment of the provisions in the United Nations Convention on the Law of the Sea of December 10, 1982, about conservation and management of migratory fish stocks and long-distance migratory fish stocks, or Agreement of November 24, 1993 about promoting fishing vessels' compliance of the international conservation and management measures in the open seas. The fisheries authorities can demand further documentation or conduct their own investigations to ensure that the vessel is not used contrary to the aforementioned agreements.»³⁵

Today, there are no such criteria.

The average age of ships exported from Norway to Africa is high. At the time of export, the average age and median for the 47 boats was 27 years old. The average age for the fleet today is 36.8 years old. The oldest ship sold to Africa was the coastal seine boat *Hasting* from Florø, which was exported to Angola this year. The ship was an impressive 61 years old. When ships get older, it naturally takes a shorter amount of time before their age affects the safety at sea. Looking at the age of the ships, we can say that it's unlikely that Norway has a standard for which ships should be scrapped rather than being sent to the African continent.

For this report, we have talked to some European and international fishery experts who also points out that the uncritical Norwegian export of discarded fishing vessels can be both formally and ethically problematic in several ways.

Norway and many other countries have some sort of subsidies and support schemes for fisheries. Among other things, they can receive public subsidies for the co-financing of modern, environmental,³⁶ or innovative fishing vessels³⁷, many municipalities and county municipalities have favourable loans and support schemes for quota purchases and vessels, and the Norwegian structural scheme can in itself be seen as subsidisation of newer and bigger vessels, as long as they get rid of the old ones. Fuel subsidies are also currently arranged to give the vessels with a higher fuel consumption more support, both in total and when divided by the amount of catch delivered.

The EU has strict rules for public subsidies to limit their usage for illegal business or other types of misuse. One of our experts³⁸ says the following about the fact that we can find former Norwegian vessels under flags of convenience fishing in West Africa:

“This might be a clear case of subsidies related to flag of convenience. It will be interesting to know if there are export regulations in that respect, my wild guess is not.”

Suppose publicly subsidised Norwegian fishing vessels are transferred to flags of convenience and participate in unsustainable fisheries. This can be seen as illegal or unwanted according to both former Norwegian export practices and international agreements.

Norway has a connection to the EU as we are part of the EEA agreement. This means that Norway must adhere to EU legislation on various topics, and fisheries is one of these. Regarding the export of fishing vessels, the EU has IUU regulations, IUU lists, and a so-called «red-card scheme». When a country has received a red card or a vessel is added to the EU IUU list (including all the IUU lists of the regional fishery bodies on the world seas, the RFMOs), a long list of sanctions is applied.³⁹

The EU sanctions against pirate fishing vessels and red-carded flags of convenience are:

- Prohibition against buying, equipping, or cooperating with these vessels.
- Outflagging to red-card countries and cooperation with vessels there are prohibited.
- Export of fishing vessels to red-card countries is explicitly prohibited. Among the flag countries on the EU red-card list at the moment are Cambodia, Cameroon, Comoros, and St. Vincent and the Grenadines. The following have a «yellow card» and should be followed up closely: Ecuador, Ghana, Liberia, Panama, Sierra Leone, Saint Kitts and Nevis, Trinidad and Tobago, and Vietnam.

The question then is what considerations are made by the Norwegian authorities. The Ministry of Trade, Industry and Fisheries has not replied to our inquiries related to this report.

On October 27 and 31 2022 and February 13 2023 we sent these questions to the Ministry of Trade, Industry and Fisheries, both to the postal reception and to the information and press section of the ministry. We never received a reply.

To the Ministry of Trade, Industry and Fisheries

The Norwegian Support Committee for Western Sahara and The Norwegian Council for Africa are in the process of writing a report about the export of old Norwegian fishing vessels to be used in the waters outside West African countries, from Namibia in the South to Morocco in the North. The information that our organisations in cooperation with The Norwegian Society for the Conservation of Nature has collected from The Norwegian Maritime Authority ship register shows a comprehensive export of former Norwegian ships.

The report will talk about dilemmas related to the environment and fisheries management connected to this trend. In the process of working on the report, we would like to ask you some clarifying questions.

1) What requirements, if any, do Norwegian authorities have for the export of used fishing vessels to other countries? Do these include a requirement for environmental sustainability?

2) Norwegian new builds are usually allowed to enter the Norwegian fishing fleet as long as capacity is removed at the same time. That means a shipping company must remove a certain amount of capacity to be able to include a new ship. Do Norwegian authorities have requirements for the exporter to ensure that the buyers of the ships don't end up increasing the capacity in the economic zones of other countries?

3) Do Norwegian authorities require vessels over a certain age to be scrapped when new vessels are added?

4) Is financing given to Norwegian companies for replacing or building new ships based on ecological/climatic/environmental sustainability – and is it connected to requirements about what will happen to the vessels that are at the same time expected to be taken out of operation?

5) Are there any requirements for Norwegian exporters of fishing vessels to the states in West Africa? If yes, what are they?

6) Have the Norwegian authorities controlled what exported vessels are used for?

7) If controls take place (see question 7), are there examples of exporters that the Norwegian authorities think have violated some conditions? If yes, what violations are they?

8) Do Norwegian authorities have any opportunities to sanction possible violations of export conditions?

We look forward to hearing from you. You are welcome to contact the undersigned if you have any questions.

Best regards.
Erik Hagen, Norwegian Support Committee for Western Sahara

How do the fishing boat owners, banks, and insurers for fisheries take responsibility?

Fishing stocks don't adhere to borders between countries; the ocean is endless to them. That seems to apply to many companies and investors investing in fishing vessels too. By following well-known shipping companies in countries like Norway, Iceland, the Faroe Islands, and the Netherlands, one will notice the same fishing vessels sold and bought between these countries. For the largest actors, it doesn't seem to be a problem to get a trawler that costs several hundred million Norwegian kroner to fish mackerel for a short period, before selling it on to a buyer in another country. The trade of fishing vessels has increased in the last decades, and today several shipbrokers offer to sell the fishing vessels on the world market. Some examples show that the ownership in part follows the re-flagging. The most active shipping companies are often in good standing with ship owners in other countries.

Corporate Social Responsibility (CSR) is a term companies both in Norway and internationally like to use in their business. In Norway, the companies, their leadership, and the company boards are responsible for keeping things in order regarding issues like health, the environment, working conditions, and the general societal impact. Internationally, the UN and the OECD among others have established standards for sustainable business.⁴⁰ In the same way, The Confederation of Norwegian Enterprise (NHO) offers companies guidance and advice about ethical guidelines. The primary understanding is that companies should create good standards and routines for social and environmental responsibility at their initiative and bring them into their operations internationally in many different countries. In the last few years, several large Norwegian banks and insurance companies

have created their own sustainability strategies, with clear guidelines for what types of environmentally damaging activities they *do not* want to help finance or insure, among other things.

Based on our findings in this report, which show that a significant amount of all the large Norwegian fishing vessels exported out of Norway in the last decades now have flags of convenience and/or go fishing in areas outside West Africa known for a lot of overfishing and IUU fishing, the authorities and the different actors involved in the outflagging and export of large Norwegian fishing vessels must be vigilant. Precautions should be considered to ensure that these fishing vessels don't contribute to undermining Norwegian and international interests and the goal of managing fishing stocks and ocean areas sustainably and in line with national laws and international maritime agreements.

Based on our list of 47 large Norwegian fishing vessels exported to fisheries in West Africa, it's possible to take a closer look at many issues, like ownership before and after sales to other countries, the role of banks and insurance companies, what requirements the authorities have for export, how much these boats have fished outside Africa, what permissions they have to do this, how they have gained the permissions, and so on.

This has been outside of the report's scope, but it would of course be very interesting to follow up. The authors of the report would be happy to contribute to further investigations.

A fisherman in the port city of Nouadhibou in Mauritania looks out over the small boat harbour. The small boats compete with the large industrial ships exported from Norway.

Recommendations

For the government and public support schemes

- The government should be able to answer inquiries about what precautions are taken to ensure sustainability, ethics, and legality when used fishing vessels are exported.
- Norwegian companies should not be allowed to export fishing vessels to red-card shipping companies or flag states.
- Norway should exercise more caution when approving the export of vessels to countries with a «yellow card» on different lists for risks around IUU fishing.
- Innovation Norway should demand that both the new boat *and the old boats* be used only for documented sustainable fishing if environmental innovation support is given.
- The Nansen Programme – which Norway and Norad finance – for fishery research outside West Africa – should continue to conduct research in occupied Western Sahara. However, it should not promote fishing in occupied territories, and necessary consent should be requested from the organisation that the UN and the Court of Justice of the EU recognise as the political and legal representative of the Sahrawi people.

For shipping companies, banks, and insurers

- Fishing boat owners should adhere to the EU list over red and yellow cards.
- Due diligence should be taken to ensure that vessels are not used for illegal activity or exported to interests in occupied Western Sahara.
- Social responsibility criteria should be set for sellers and distributors of used vessels.
- Environmental risk from fishing activity should become part of the ethical guidelines that banks, owners, and insurers use when fishing vessels are bought and sold.
- Banks should convey environmental expectations when financing new builds, and request information about what will happen to the ships that are taken out of the fishery.
- Fishing companies involved in unsustainable fisheries or IUU fishing should be considered removed from the portfolio.
- Vessels that are sold to IUU risk fisheries should not receive insurance⁴¹ or financing.



Sources

¹ Haugesunds Avis, Rørt og stolt gudmor, 09.09.2019.

² Aftenposten, 23.04.2010, Riebers omdøm-metap, <https://www.aftenposten.no/meninger/leder/i/kRLw9/riebers-omdoemmetap>.

³ TMT, 28.04.2022, Spotlight on: The use of African flag registries by high risk fishing operators, <https://www.tm-tracking.org/post/spotlight-on-the-use-of-african-flag-registries-by-high-risk-fishing-operators>.

⁴ Fiskeribladet, 27.10.2017, Østervold med fabrikkskip og fire fiskebåter.

⁵ FAO Fishery Committee for the Eastern Central Atlantic, Summary Report, Working Group on the Assessment of Small Pelagic Fish off Northwest Africa 2021.

⁶ Statista, 07.06.2021, The Oceans Suffering Most From Illegal Fishing, <https://www.statista.com/chart/25021/illegal-fishing-revenue-losses-by-ocean/> Stop Illegal Fishing, 14.06.2016, West Africa Loses 1.3 billion dollars to Illegal Fishing – Report, <https://stopillegalfishing.com/press-links/west-africa-loses-1-3-billion-dollars-illegal-fishing-report/>.

⁷ Science, 02.11.2022, Hot spots of unseen fishing vessels, <https://www.science.org/doi/10.1126/sciadv.abq2109>.

⁸ Court of Justice of the European Union, 27.02.2018, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62016CJ0266> An overview of the EU Court of Justice rulings relating to EU-Morocco fisheries, trade and aviation agreements applied to Western Sahara can be found here: <https://www.wsrw.org/en/news/the-eu-court-cases>.

⁹ Sub-Regional Fisheries Commission, 11.3.2023 <http://spcsrp.org/en/west-africa-regional-fisheries-program-warfp>.

¹⁰ Ibid.

¹¹ The Norwegian Support Committee for Western Sahara, Rent mel i posen?, 24.05.2022, <https://www.vest-sahara.no/nb/nyheter/rapport-op-pdrettsnaeringen-ma-satse-mer-pa-baerekraft>.

¹² bit.ly/379rqF9.

¹³ https://ec.europa.eu/commission/presscorner/detail/en/qanda_21_2747.

¹⁴ Haugesunds Avis, Investerer over 400 millioner: - Det er blitt en god og sikker arbeidsplass, 17.06.2019.

¹⁵ Karmøynytt, 26.20.2018, Sjøuhyret i Veavågen fisker for 100 millioner kroner i året, <https://karmoynytt.no/sjohuhyret-i-veavagen-fisker-for-100-millioner-kroner-i-aret/30.10-10:35>.

¹⁶ Letter from Norwegian Support Committee to Cetus AS, 24.06.2020, https://vest-sahara.s3.amazonaws.com/skvs/feature-images/File/434/61c831c7384c2_SKVS-Cetus_24.06.2020.pdf.

¹⁷ FiskeribladetFiskaren, 11.03.2016, Østervold tjener på sardinella i Mauritania, <https://www.nb.no/items/45ee4e21f940d8529cb550f7a9c-2423d?page=11>, Fiskeribladet, 26.10.2017, Østervold med fabrikkskip og fire fiskebåter, <https://www.fiskeribladet.no/nyheter/ostervold-med-fabrikkskip-og-fire-fiskebater/8-1-56314>.

¹⁸ <https://www.sdir.no/skipssok/#/shipde-tails/57310/1>.

¹⁹ Bergens Tidende, 16.12.2021, Aus-tevold-rederiet fikk historisk bot. Nå kreves de for 73 millioner, <https://www.bt.no/nyheter/okonomi/i/34XMAq/politiet-krever-73-millioner-kroner-for-mulig-lovbrudd-utenfor-afrikas-kyst>.

²⁰ Fiskeribladet, 01.11.2022, Aktors påstand: 75 millioner i bot og inndragning – dømt til 3,2 millioner, <https://www.fiskeribladet.no/okonomi/aktors-pastand-75-millioner-i-bot-og-inndragning-domt-til-3-2-millioner/2-1-1344864>.

²¹ Fiskeribladet 14.11. 2022 <https://www.fiskeribladet.no/okonomi/statsadvokaten-ank-er-dom-mot-austevoll-selskap-vil-ha-storreb-ot-og-inndragning/2-1-1353488>.

²² Fiskeribladet 7.3.2023 <https://www.fiskeribladet.no/okonomi/omkamp-i-straffesak-mot-fiskeriselskap-i-lagmannsretten/2-1-1414281>.

²³ Fiskeridirektoratet, 02.01.2023, Fiskeflåten, <https://www.fiskeridir.no/Yrkesfiske/Tall-og-analyse/Fiskere-fartoe-og-tillatelser/Fartoe-i-merkeregisteret/fiskeflaaten>.

²⁴ TMT, 28.04.2022, Spotlight on: The use of African flag registries by high risk fishing operators, <https://www.tm-tracking.org/post/spotlight-on-the-use-of-african-flag-registries-by-high-risk-fishing-operators>.

²⁵ Ibid.

²⁶ Norad, 07.06.2021, Nansenprogrammet, <https://www.norad.no/tema/klima-miljo-og-naturressurser/fiskeribistand/eaf-nansen-programmet/>.

²⁷ WSRW.org, 25.02.2021, Morocco spends most of EU's fish support in occupied land, <https://www.wsrw.org/en/news/morocco-spends-most-eus-fish-support-in-occupied-land>.

²⁸ Norad, 23.03.2023, Mellom mål og middel: Fiskeribistand under Nansen-samarbeidet, https://www.norad.no/globalassets/publikasjoner/publikasjoner-2023/evalueringer/8.2022_evaluation-of-norwegian-support-under-the-nansen-cooperation-in-the-fisheries-sector.pdf.

²⁹ Norwegian Government, 06.07.2022, Høringsnotat, Fordeling av strukturgevinst fra utløpt tidsbegrensning i strukturvoteordningen, <https://www.regjeringen.no/contentassets/a75672e7d17f45ba92053c0fe1fca684/struktur-gevinst-til-horingsnotat.pdf>.

³⁰ Nofima, mars 2018, Strukturering i fiskeflåten, <https://nofima.brage.unit.no/nofima-xmlui/bitstream/handle/11250/2494411/Rapport%2B08-2018.pdf?sequence=2&isAllowed=y>.

³¹ Norwegian Ministry of Trade, Industry and Fisheries, NOU 2016: 26, Et fremtidsrettet kvotesystem, <https://www.regjeringen.no/no/dokumenter/nou-2016-26/id2523539/>.

³² Nofima, mars 2018, Strukturering i fiskeflåten, <https://nofima.brage.unit.no/nofima-xmlui/bitstream/handle/11250/2494411/Rapport%2B08-2018.pdf?sequence=2&isAllowed=y>.

³³ Norwegian Government, 06.07.2022, Høringsnotat, Fordeling av strukturgevinst fra utløpt tidsbegrensning i strukturvoteordningen, <https://www.regjeringen.no/contentassets/a75672e7d17f45ba92053c0fe1fca684/struktur-gevinst-til-horingsnotat.pdf>.

³⁴ Forskrift for tildeling av tilskudd til kondemnering for fiskefartøy i 2002. <https://lovdata.no/dokument/SFO/forskrift/2002-05-16-472?q=kondemnering>.

³⁵ The Ministry of Trade, Industry and Fisheries, 13/10/2021, UN Fish Stock Agreement <https://www.regjeringen.no/no/tema/mat-fiske-og-landbruk/fiskeri-og-havbruk/1/fiskeri/internasjonalt-fiskerisamarbeid/internasjonalt-fn-avtalen-om-fiske-pa-det-apne-hav/id445764/>.

³⁶ Innovation Norway, 20.08.2020, Risikolå-neordning for rederier innen nærskipfart og fiskeri, <https://www.innovasjonnorge.no/no/tjenester/skipsfart-og-fiske/risikolaneordning-for-rederier-innen-narskipsfart-og-fiskeri/>.

³⁷ Innovation Norway, 28.03.2023, Fiskefartøy og fiskerettigheter, <https://www.innovasjonnorge.no/no/tjenester/skipsfart-og-fiske/fiskefartoy-og-fiskerettigheter/>.

³⁸ Ernesto Fernandez Monge in an email on January 11 2023. Monge is a lawyer and expert in international trade law with a background from WTO and the World Bank, among other places. Today, he works for Project Ending Harmful Fisheries Subsidies in Pew Charitable Trust.

³⁹ Pointed out by lawyer Nikolas Evangelides in an email on January 13, 2023. Evagelides has a background from the Ministry of Foreign Affairs in Cyprus and as an EU envoy. He now works in an NGO to stop illegal fishing.

⁴⁰ For instance, UN Guiding Principles for Business and Human Rights.

⁴¹ Trygg Mat Tracking, 20.09.2022, Net closing on illegal fishers through launch of new insurance tool, <https://www.tm-tracking.org/post/net-closing-on-illegal-fishers-through-launch-of-new-insurance-tool>.

