
Cetacean slaughter, shark finning and human rights abuse in Taiwan's fishing fleet

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The Environmental Justice Foundation (EJF) is an environmental organisation working internationally to combat illegal, unreported and unregulated ('IUU') fishing and promote sustainable management of fisheries. EJF uses remote monitoring technology and conducts interviews with former crew from fishing vessels to document instances of IUU fishing, as well as related crimes such as human trafficking and forced labour.

Vessel names have been omitted from this briefing to allow Taiwanese authorities to conduct investigations into the allegations made by former crewmembers.

Summary

Over the past year, EJF investigators interviewed fishers in Indonesia who returned after working on Taiwanese fishing vessels. The interviews uncovered destructive fishing methods targeting marine mammals including cetaceans. These charismatic species are reportedly killed, chopped up and used as bait to catch sharks or for trophies, according to the crew's testimony.

Such illegal fishing practices are deeply damaging to the marine environment, where marine mammals play critical ecological roles. Over the past three years, EJF has submitted briefings and IUU fishing notifications on 20 vessels allegedly catching cetaceans to the Taiwanese Fisheries Agency. These documents are based on detailed interviews conducted with former crew as well as photos taken on board. Alongside these interviews, EJF collects and analyses other evidence to corroborate interviewee testimony. These sources include copies of employment contracts, passports, visa information as well as verified vessel identification from official vessel databases and Automatic Identification System (AIS) satellite tracking of fishing vessel movements (where available).

In no instances so far have any sanctions been brought against vessel owners by the Fisheries Agency for cases that we have submitted alleging the intentional catch of marine mammals. EJF is concerned that the current capacity of authorities to monitor these vessels at sea and investigate such crimes is insufficient to detect and deter such operations.

This document provides a further seven case studies of vessels allegedly involved in the killing of cetaceans and other marine mammals. The continued prevalence of alleged IUU fishing and human rights abuses despite changes in Taiwanese legislation points to serious shortcomings in monitoring and enforcement. These shortcomings risk undermining the progress carried out by Taiwan to remove its 'yellow card' warning from the European Union and also could have implications for the assessment of Taiwan under the USA's Marine Mammal Protection Act and Magnuson-Stevens Fishery Conservation and Management Reauthorization Act. Recommendations are therefore provided at the conclusion of the briefing for the Taiwanese government to address the issues raised—in particular the rapid introduction of electronic monitoring, including cameras, on distant water fishing vessels and further reforms to increase transparency in the Taiwanese fishing sector.

Catch of cetaceans and other marine mammals

Both intentional and accidental (as by-catch) capture of marine mammals are common on fishing vessels, and EJF's previous investigations into the distant water fleets of both Taiwan¹ and South Korea² have demonstrated the scale of this problem. Cetaceans including false killer whales (*Pseudorca crassidens*) and other dolphin species such as bottlenose (*Tursiops truncatus*) and common dolphins (*Delphinus delphis* and *D. capensis*) are widely reported to interact with pelagic longline fisheries around the world.^{3/4/5} They are attracted to longline fishing vessels by both their distinctive noise and the smell of bait or the caught tuna.⁶ These marine mammals can become hooked or entangled on longlines when they attempt to eat the bait or tuna. This often results in the death of the animal due to asphyxiation or exhaustion. They may also be injured by the hook resulting in impaired foraging or other injuries.⁷ The perceived economic damage caused by toothed whales to longline catches may even result in fishing crews being ordered to kill these animals in order to minimise future losses.⁸

In several cases, crew working on board vessels targeting sharks reported to EJF that dolphins were also deliberately hunted, and their meat used as bait. This practice has been previously reported in shark fisheries around the world. A recent study found, for example, that using aquatic mammals for bait has been observed in at least 33 countries since 1970.⁹ For instance, harpooning practices similar to those described by the crew of Vessel B in this briefing were observed on board fishing vessels targeting sharks in Peru.^{10/11}

When EJF investigators asked why dolphin meat was used as longline bait, several crew explained that dolphin blood is perceived to be especially attractive to sharks. This is consistent with reports from other shark fisheries where fishers reported that the "high blood and fat content makes dolphin meat an efficient attractant, while the meat's hardy nature allows it to remain attached to hooks after extended periods of soaking (unlike other baits, fish in particular)".¹²

Elsewhere, some distant water squid jigger vessels operating in the South Atlantic have reportedly been catching seals. Instead of releasing them immediately, crew allege that the animals were killed in order to harvest their teeth, according to the crewmember EJF interviewed. This practice was recently documented by EJF interviews with former fishers who had worked on Korean squid jiggers³³. An example of a Taiwanese squid jigger catching seals can be found in case study E below. In this case, their teeth were allegedly kept by captains or crew as trophies or sold as souvenirs.

Official Catch Statistics and the USA’s Marine Mammal Protection Act

The Act for Distant Water Fisheries (Article 10) has required electronic logbooks for all Taiwanese distant water vessels since the beginning of 2018.¹⁴ Captains must use them to record their catch for review by government officials. It is illegal to misreport catch, including by-catch.

According to official government records for the by-catch of dolphins and sea turtles by purse seiners and longliners, Taiwanese distant water fishing vessels caught 64 cetaceans and 224 sea turtles in 2018 and 212 cetaceans and 118 sea turtles in 2019¹⁵ (as some trips of 2019 extended to 2020, the data is not entirely complete yet).

Within this, the Fisheries Agency reports the catch of only six cetaceans in 2018 and seven in 2019 by longliners.¹⁶ EJF is concerned that these reported numbers grossly underestimate the actual catch of cetaceans. Crew from Vessel A, for example, allege that it caught more than 110 dolphins in a year. Although this high level of catch is well above average, it is clear that the catch of cetaceans across the over 900 longliners in Taiwan’s distant water fleet is likely many times greater than those reported in Fisheries Agency data. Without cameras on board, it is very difficult for authorities to find any evidence or impose any sanctions for false reporting after the vessels have returned to port.

Table 1: Official by-catch data

Year	2018		2019	
	Purse Seiner (Captain’s record)	Longliner (Observer’s record)	Purse Seiner (Captain’s record)	Longliner (Observer’s record)
Cetaceans	58	6	205	7
Sea turtles	25	199	32	86

Source: Fisheries Agency

Since January 2017, the USA’s Marine Mammal Protection Act (MMPA) Import Provision requires countries that export fish to the USA to reduce marine mammal by-catch levels to the same standards as US commercial fishing operations.¹⁷ The findings of this briefing and previous EJF investigations suggest there are a large number of marine mammals both deliberately targeted and incidentally caught by Taiwanese vessels. There is a strong risk that by providing incomplete data regarding cetacean catches, Taiwanese authorities will not enable the USA’s National Oceanic and Atmospheric Administration (NOAA) to properly assess Taiwan’s compliance with the MMPA.

Shark Finning

Shark finning has been banned in Taiwan since 2013, but EJF and other NGOs such as Greenpeace continue to find evidence of vessels carrying out this practice whilst at sea.^{18/19} Fins are either transferred to other vessels to unload in other countries or simply hidden under the legitimate catch or the crew’s food and brought back to Taiwan.²⁰ Without electronic monitoring of fishing activities and trans-shipments as well improved inspections in Taiwanese ports, these destructive practices will continue. During interviews in which former crewmembers alleged the catch and finning of sharks, EJF’s investigators ask them to identify the species. Several of the species identified appear on the International Union for Conservation of Nature’s (IUCN’s) Red List of Threatened Species.²¹ Several species are also included in Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), which means that the ‘trade of these animals must be controlled in order to avoid utilisation incompatible with their survival’.²²

Case Studies

Vessel A

ID number	IMO	Flag	Operating area	Landing site	Group
		Taiwan	Near Japanese and Western Pacific	Donggang (according to the crew)	Seasonal shark

IUU fishing and wildlife exploitation

All interviewed crewmembers reported that the vessel intentionally killed dolphins to use them as bait for sharks – the main targeted catch of the vessel. Crewmember D reported that in a trip between August to December 2019, the vessel caught around 70 dolphins and in another trip, between February to June 2020, the vessel caught about 40 dolphins. The interviewees described catching various species of sharks including Shortfin Mako shark (Endangered), Thresher shark (Vulnerable), Hammerhead shark (Critically Endangered and Vulnerable), Oceanic Whitetip shark (Vulnerable), Blacktip shark (Near Threatened) and Blue shark (Near Threatened)²³. Thresher sharks were usually finned and the bodies were used as bait. Oceanic Whitetip and Black tips sharks were often finned too.

“Fin is kept in sacks, body kept in the freezer. If the freezer is too full, we only take the fin and the body is thrown away except for shortfin mako shark in which the body is kept because of its high value.”

Crewmember B

Crewmembers also reported that when they began their return journey to port, they would dump any remaining unused dolphin meat into the sea to avoid government inspections.

“When we were going back in end of November, many sacks filled with the remaining dolphins were thrown from the boat. That is about 6 sacks with each containing about 500 pieces of dolphin meat.”

Crewmember A

“About 6 sacks full of dolphin meat left. Captain order us to throw it and captain also order us to recheck and make sure that there is no dolphin left on board. Captain said “Make sure, no single pieces of dolphin meat left!”. Captain seems worried at that time.”

Crewmember C

Crewmember D told EJJ that fish and Blue sharks were unloaded in Donggong whereas all the fins were unloaded in Xiao Liu-Qiu.

Due to the lack of DNA information, it is difficult to confirm the species of the dolphin. However, according to several marine mammal experts, the filleted dolphins in the photo provided by the crew appear to be Short-beaked Common Dolphins.



Photo 1: filleted dolphins on the deck. Source: Crewmember A



Picture 2 and 3 and source: Pictures comparisons that confirm the identity of Vessel A provided by the interviewee and by Apple Daily Taiwan Branch.

Crew living and working conditions

Crewmembers A, B and C were sent back to Indonesia before their contract finished and they received their guarantee money, which is an upfront payment or deduction taken on a monthly basis from the crew's salary to the manning agency or employer to guarantee the worker will fulfill their contract (this practice often enables debt bondage and forced labour). These payments ranged from US \$500 to US \$ 600. In addition crewmembers experienced deductions from their salary of US \$ 300.

All interviewed crewmembers reported insufficient food and long working hours (more than 20 hours) with very limited time to rest.

Vessel B

ID number	Callsign/IMO	Flag	Operating area	Landing site
		Taiwan	Near Japanese waters	Donggang (according to the crew)

IUU fishing and wildlife exploitation

EJF interviewed three crewmembers from Vessel B in 2018 in which they alleged the illegal practice of hunting dolphins to use as baits to catch sharks. A subsequent EJF briefing was submitted to the Fisheries Agency in November 2018 for investigation.

The Fisheries Agency replied to EJF with their investigation report in April 2019 stating that the captain denied hunting dolphins. The Fisheries Agency also informed EJF that the vessel was now classified as high-risk and allocated a human observer to the vessel.

However, in January 2020, EJF interviewed a further crewmember from this vessel who reported that the same dolphin hunting practices had resumed on board the vessel during his employment between January to November 2019. The crewmember reported that in October and November 2019 the vessel harpooned dolphins and cut them into small pieces to use as bait. In one of the photos that the crew provided, an unborn baby dolphin - judging by the size - is being held by one of the crew.



Photo 4: A crewmember holding an unborn dolphin. Source: Crewmember

In the first interview with a crewmember (2018), it was reported that crew were made to catch dolphins as they surfed the bow waves of the vessel, using a harpoon with a rope attached. Fishers would stab dolphins one-by-one, and then drag them by the side of the boat while they waited for the dolphin to tire. After about 10 minutes, the dolphin would be exhausted and they would be able to haul them onto the boat. If they were still alive they would use a car battery to electrocute and stun the dolphin. Crew also reported using juvenile sharks as bait rather than returning them to the sea. EJF submitted this statement to the Fisheries Agency in 2018 for investigation.

“Dolphins have a lot of blood and the smell is strong. This attracts the sharks very easily.”

Previous interview with crewmember on Vessel B

“We get about 1 to 2 dolphins each time they spear fish. It is often cut into small pieces and used as bait.”

Crew A

The crew also reported that shark and tuna species were their main catch. Sharks fins and bodies were mostly kept but when the freezer was full, they would fin Oceanic Whitetip Sharks and throw away the bodies. The crew also reported that when they caught Thresher Sharks and Oceanic Whitetip Sharks, they would use the flesh as bait or for the crew's food.

The crew also told EJF that when they returned to port, they were inspected by a Taiwanese official who interviewed all the crew about what kind of fish they caught. However, according to the interviewee, nobody told the official the truth because they were afraid.

“At the first trip and the second trip, there was a police (observer) on board. About 3 months the observer on board. When there was an observer, we would not fin the oceanic whitetip sharks. In the third trip we started finning again.”

Crew A

Crew living and working conditions

The crewmember interviewed most recently reported long working hours, especially when catching dolphins. He also reported a total deduction of US\$ 1350 for guarantee money (US\$ 800) and document processing fees (US\$ 550). The interviewee had to terminate the contract early and thus had to pay for his own return ticket. As of the date of the EJF interview in January 2020, he had not received the guarantee money and the agency was not contactable. Charging of guarantee money and requiring crew to pay for return tickets are against the principles of the International Labour Organization Work in Fishing Convention (ILO C188).

Vessel C

ID number	Callsign/IMO	Flag	Operating area	Landing site
		Taiwan	Around Japan (According to the crew)	Donggong

IUU fishing and wildlife exploitation

The crewmember reported that sharks were among the main targets of the vessel and that they could catch 20 to 50 sharks per day. They would fin all types of sharks except Blue sharks. After collecting fins, they would store them under the other catch or hide them under piles of food. He also reported that fins were unloaded at port at 5 am when there was no inspection.

According to the crewmember, the vessel also hunted dolphins to use as bait for sharks. In his last trip, they caught about 12 dolphins and sometimes the vessel would share dolphin bait with other vessels.

Crew living and working conditions

The crewmember reported insufficient working equipment and had to request further protective equipment including gloves. Working hours could be between 20 to 28 hours in a row with only four hours of sleep in between. The captain's son would reportedly verbally abuse most of the crew and reportedly physically abused at least two crewmembers.

One of the crewmembers died on the vessel. The interviewee was told that the crewmember had died due to a heart-related issue. However, the deceased fisher had allegedly experienced verbal abuse and threats by the captain's son while serving on the vessel. Following the death, the vessel returned to port earlier than planned. According to the interviewee, most of the crew requested to end their contracts due to the abusive behaviour of the captain's son.

The interviewee had to pay US\$ 300 for a passport, seaman book and medical check and a further US\$ 900 for guarantee money.

Vessel D

ID number	Callsign/IMO	Flag	Operating area	Landing site
		Taiwan	Near Japan and Argentina	Not provided

IUU fishing and wildlife exploitation

The interviewee reported that around the waters off of Argentina, they sometimes would catch seals. The captain would give some of the seal teeth to the crew as souvenirs.

“The bottom teeth is about 5 cm in length. The upper teeth can go up to 8 cm in length. Not every crew gets it from the captain. How often this is done, is unclear but probably once a month and usually just one seal at a time. Normally when someone is fishing, if seals get stuck, people would start yelling and then they would spearfish it.”

Crew living and working conditions

The interviewee reported boarding the vessel in Argentina, and was transported by a small boat from port to meet the vessel at sea.

The crewmember reported long working hours with limited time to rest (six hours including sleep, shower and meals) and verbal abuse exclusively toward Indonesian fishers (other crews on board from Vietnam, Taiwan or the Philippines did not experience any abuse). Some Indonesian crew were also physically abused by the foreman, who was Taiwanese. The crewmember also reported that the vessel ran out of food within seven months of sailing and they were forced to eat only plain rice. He had to pay extra for drinking water.

The interviewee also reported having to pay US\$ 900 guarantee money and US\$ 300 for other deductions.

Vessel E

ID number	Callsign/IMO	Flag	Operating area	Landing site
		Taiwan	Near Japanese waters	Donggong

IUU fishing and wildlife exploitation

The interviewee reported sharks as their main catch with 150 or more being caught in one day. All types of sharks would be finned but when the freezer was full, they would sometimes use Thresher shark flesh for bait. The crewmember also reported that they would usually receive dolphin meat from at least two vessels to use as bait for sharks.

Crew living and working conditions

The interviewee reported a lack of food and water on the vessel and long working hours of up to 18 or 20 hours. He was dismissed from the vessel by the manning agency due to illness that resulting in him paying for hospital treatment, dormitory accommodation and flight ticket from a US\$ 700 guarantee. He received part of this back. His Indonesian broker also deducted US\$ 600 from his salary.

Vessel F

ID number	Callsign/IMO	Flag	Operating area	Landing site
		Taiwan	Near Japanese waters	Donggong

IUU fishing and wildlife exploitation

The crewmember reported catching three false killer whales in 11 months of service. They killed one of them and took the teeth.



Photo 5: Crewmembers holding a false killer whale's head. Source: Crewmember

Crew living and working conditions

The crew reported a US\$ 700 deduction from his salary and often had to work up to 20 hours. No other issues were reported.

Vessel G

ID number	Callsign/IMO	Flag	Operating area	Landing site
		Taiwan	Near Japanese waters	Donggong

IUU fishing and wildlife exploitation

The crewmember reported that the vessel would target sharks in September and October and sometimes they could catch up to 200 sharks per day including small sharks under 50 kg which they would fin. According to the crew, the vessel would always fin Blacktip, Whitetip and Tiger sharks. When they caught Hammerhead sharks – prohibited species under Western and Central Pacific Fisheries Commission’s regulations - they would keep the fins and the bodies but discard the heads.

According to the interviewee, the vessel also caught dolphins to use as bait to catch sharks. They caught about 70 dolphins within a period of three months and shared the dolphin meat with other vessels. The interviewee said that when the vessel was inspected by foreign authorities at sea, they would throw away all the dolphin meat and clean away all the evidence. They would still keep the fins. The crewmember speculated that the inspectors were only interested in discovering dolphins but not shark fins.

“Yes, we caught dolphins to be used as sharks baits. The captain will ask us to catch around 15 dolphins. But sometimes we would get more than that, even 20 dolphins. He would give the extras to his friends who also did shark operations.”

Crew A

The crewmember tried to take photos of the dolphins but was stopped by the captain.

Crew living and working conditions

The crewmember reported that he had US\$ 400 deducted from his salary by the Taiwanese agency and had to pay US\$ 1,000 for guarantee money, which has been paid back to him by the Taiwanese agency.

He reported some work equipment was not provided to new crew, and sometimes they had to work very long hours with only two hours of sleep.

Conclusions and Recommendations

Over the past four years, Taiwan has made progressive improvements in the development of laws designed to prevent IUU fishing and protect human rights, including the commitment to bring domestic regulations in line with ILO C188. However, implementation and enforcement of these regulations are still insufficient. EJF's investigations continue to uncover a wide range of IUU fishing and human rights related abuse committed on board Taiwanese distant water fishing vessels. Acute capacity gaps in enforcement by the competent authorities are central to these concerns. With a fleet of over 1,000 vessels operating across three major world oceans and unloading into 32 ports both in Taiwan and overseas, it is necessary for the Taiwanese government to enforce regulations and adopt technologies that can prevent these crimes going unnoticed.

EJF recommends that the Taiwanese government urgently:

1. Publicly commit to implementing Electronic Monitoring Systems (EMS) including remote sensors and cameras on the distant water fleet. Priority in the roll-out of this technology should be given to high-risk vessels. According to testimonies, some vessels use cetacean meat to lure sharks. As such, many of the vessels in this report that were alleged to have hunted cetaceans for this purpose belong to the seasonal shark fleet. These vessels are also reported to be associated with shark finning. Hence, due to the high value of shark fins and continuous allegations of illegal finning practices from this group of vessels, it is recommended to classify all seasonal shark vessels as high-risk and be subject to urgent EMS monitoring.
2. Adopt and implement the measures contained in EJJ's Charter for Transparency in their entirety²⁴. This should include providing sufficient resources to bring Taiwanese domestic law in line with ILO C188 and restricting the use of flags of convenience.
3. Establish a cross-governmental inspection unit to investigate IUU fishing and human rights abuses. IUU fishing and human rights abuses are closely linked issues and require cross-departmental collaboration that includes expertise across a variety of different fields to effectively investigate and prosecute. This should also include input from civil society.
4. Increase inspector coverage to include all authorised overseas ports (or reduce the number of such ports if more practical in some instances) and provide inspectors with extensive training in identifying human rights abuses and IUU fishing crimes. Conduct comprehensive, victim-centered interviews with a sample of crewmembers during vessel inspections in order to identify potential human right abuses and cases of illegal fishing.
5. Crew should have the ability to raise any concerns that they encounter on board directly with authorities and civil society groups. This should include concerns over human rights and illegal fishing. The Fisheries Agency has plans to install WIFI on all Taiwanese DWF vessels. EJJ strongly encourages this plan, which, if properly implemented, could empower migrant crew on vessels at sea.

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- 13 EJF (2020) Illegal fishing and human rights abuses in the Korean fishing fleet <https://ejfoundation.org/reports/illegal-fishing-and-human-rights-abuses-in-the-korean-fishing-fleet>
- 14 Act for Distant Water Fisheries <https://law.moj.gov.tw/ENG/LawClass/LawAll.aspx?pcode=M0050051>
- 15 According to the official recorded provided by the Fisheries Agency on 3rd August 2020.
- 16 The Fishery Agency's data from purse seiners is based on the records made by captains and that from longliners is based reports of on-board observers. When asked why the government does not have data from both captains and observers of both fleets, the Fisheries Agency responded that the observers' data from purse seiners is held by Regional Fisheries Management Organisations (RFMOs) and that the government does not have access to it. As for the data of longliners, the Fisheries Agency claimed it was only willing to provide observers' records due to inconsistent reporting by captains.
- 17 NOAA (last update April 2020) NOAA Fisheries Establishes International Marine Mammal Bycatch Criteria for U.S. Imports <https://www.fisheries.noaa.gov/foreign/marine-mammal-protection/noaa-fisheries-establishes-international-marine-mammal-bycatch-criteria-us-imports>
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