

From: Nygård, Kristina Kvamme
Sent: Thursday, 5 November 2020, 8:17
To: Bjørnar Myrseth <Bjornar.Myrseth@fiskeridir.no>
Cc: Myklebust, Olav <olav.myklebust@mfa.no>; Havn, Anne <Anne.Havn@mfa.no>; Vikanes Ingrid <Ingrid.Vikanes@nfd.dep.no>
Subject: FW: Report on methodology and terminology - draft proposal

In addition to the proposals that were sent by e-mail on 2 November, see three good comments from Ingrid Vikanes in the attached version.

The comments are included in Sections 4.2, 4.3 and 7.5. The first two remarks concern the text "no tracks in zone" which is proposed to be changed to "no tracks" or "no tracks in area". The latest remark concerns the text "in the Fisheries Protection Zone" in a supplement from the Ministry of Foreign Affairs. The text is changed to "on the Norwegian continental shelf in the Fisheries Protection Zone".

In addition, an adjustment has been made in Section 4.6 of the Ministry of Foreign Affairs' text, and in/on/over the continental shelf and of/in the Loop Hole (*Translators note: the area is also known as Smutthullet. Smutthullet = Loop hole in Norwegian*) has been corrected where the Ministry of Foreign Affairs has overlooked it.

Best regards,
Kristina Nygård
senior adviser, Legal Department, Ministry of Foreign Affairs

From: Nygård, Kristina Kvamme

Sent: torsdag 5. november 2020 08:17

To: Bjørnar Myrseth <Bjornar.Myrseth@fiskeridir.no>

Cc: Myklebust, Olav <olav.myklebust@mfa.no>; Havn, Anne <Anne.Havn@mfa.no>; Vikanes Ingrid <Ingrid.Vikaner@nfd.dep.no>

Subject: FW: Rapport om metode og terminologi - utkast med forslag

I tillegg til forslagene som ble sendt over ved e-post 2. november, se tre gode merknader fra Ingrid Vikanes i vedlagte versjon.

Merknadene er lagt inn til pkt 4.2, 4.3 og 7.5. De to første merknadene gjelder teksten «no tracks in zone» som foreslås endret til «no tracks» eller «no tracks in area». Den siste merknaden gjelder teksten «in the Fisheries Protection Zone» i et tillegg fra UD. Teksten endres til «on the Norwegian continental shelf in the Fisheries Protection Zone».

I tillegg er det lagt inn en justering i pkt. 4.6 i UD's tekst, og in/on/over the continental shelf og of/in the Loop Hole er rettet opp der UD har oversett det.

Hilsen

Kristina Nygård

seniorrådgiver, Rettsavdelingen, UD

Commented [UDI]: Is it possible to enter a description of what the Analysis Unit is, for example, as a footnote on the first page?

Commented [UD2]: It can be educational with the summary first, instead of last. As it stands, it may appear that the main purpose of this sub-report is to clarify concepts.

Commented [HESS]: The regulations on landing and closing slips operate with these two notes. Landing slip is where the landing takes place at a reception, and this is signed by the place of reception and the skipper. The closing slip is issued by the buyer of the fish. It is issued immediately, and without a landing slip, if the fish is already sold at the landing. If the sale takes place later, a landing slip is issued first and then a closing slip.

So, there is always a closing slip, but not always a separate landing slip. It is important that it is clear in the report what the information is taken from.

Commented [UD4]: Should be a bit more detailed: Eg. "Issued by ... based on? and describes the time and date, amount and type of catch,

Commented [UD5]: Only talking about landing slips or also closing slips?

Commented [UD6]: Is the text "Fisheries protection zone around Svalbard" automatically generated, or is it possible to change to "Fisheries Protection Zone around Svalbard" and move, so that it is in the sea area, not above the archipelago?

Commented [UD7]: Is it possible to be clearer on who issued these bank notes? This has an impact on the probative value of the information provided.

Commented [UD8]: Is it appropriate to use this particular trip, which according to the description above is the only one to the fisheries protection zone, to illustrate a journey that starts in one port and ends in another? Can this part be removed, or replaced with a mention of another trip?

Commented [UD9]: As it stands, it may appear that there were several cruises to the fish protection zone. Can this be reworded so that it is quite clear that this implies an exception, but at the same time makes it clear that it would have been captured if there had been more than one. An attempt of rewording has been submitted.

Commented [UD10]: Here it says "most of", but since the picture shows that all fishing activity took place in Smutthullet on the Russian shelf, it should say this.

Commented [UD11]: Can this be understood as there has been fishing activity at higher speeds? Can it be possibly written that speeds above 6 knots are assumed to be transit between the areas? See suggestions.

Commented [UD12]: Is there a need for clarification? For example, to point out that there was no snow crab there, that the landing document says another area e.L?

Commented [UD13]: Can we say something about the meaning? Here it's yellow all the way, so we can say something a la: "Here, however, the data show that the speed of the vessel has been too high to allow for any snow crab harvesting activities / Possibly also" Also elsewhere in the report, such inaccuracies will not have affected the calculations regarding on which continental shelf crabbing operations have taken place "

Commented [V114]: Is it unfortunate to use "zone" here? Could one instead use "area"? Alternatively, just "No tracks"?

Commented [V115]: See note above.

Commented [UD16]: Here or elsewhere it will be useful to include an even more accurate explanation of what a landing slip is. Below, clarify whether it is only information from the landing slip or even the closing slip and whether the date used is for the landing.

Commented [UD17]: Here it will be useful to specify the date for this fishing activity on the Norwegian shelf and compare with what the relevant closing slip says about where they had caught on this particular trip.

Commented [UD18]: This is very useful information. It clearly shows that these vessels can be used, and have been/are used, for other than snow crab fishing on the Norwegian shelf.

It might also have been useful to specify under each vessel that they have not caught in the fishery protection zone off Svalbard - except for one trip to the Senator.

Commented [UD19]: Do we have any information about what the vessel did?

Commented [UD20]: Can a mention be made of this vessel in the same way as for the other vessels? That is, emphasize that the catch was on the Russian shelf and feel free to write what the vessel is doing now.

Commented [UD21]: What is the flag state and shipping company for these vessels?

Commented [UD22]: Are the proceeds in 2016 related to this cruise?

Commented [UD23]: Is this the catch for which the vessel was arrested in 2016?

Commented [UD25]: How does this go up with the numbers given for Senator and Saldus above (2,520 + 1,535 = 4,555)

What will be the percentage caught on the Russian side?

When it says "live weight", this also includes what has been delivered for transshipment, if a) Reefer delivers to Norway, and b) Reefer delivers directly abroad?

Commented [UD26]: Can anything be said about the relationship between "live weight" versus "frozen" as mentioned above?

Commented [UD27]: It should be stated here how many of these inspections are out in the field, and how many are at the port state control

Commented [VI28]: Here it might say "on the Norwegian continental shelf in the Fisheries Protection Zone"?



FISKERIDIREKTORATET

The Norwegian Directorate of Fisheries



KYSTVERKET

The Norwegian Coastal Administration

GUIDANCE AND SUMMARY

~~Attachment to~~

REPORTS CONCERNING

**VESSELS BELONGING TO THE LATVIAN
COMPANY SIA NORTH STAR**

~~from~~by

THE SECTION OF ANALYSIS IN VARDØ

This report has been prepared by the Section of Analysis in Vardø, which is a joint unit of The Norwegian Directorate of Fisheries and the Norwegian Coastal Administration aimed at analyzing available information on movement and activities of vessels and at revealing illegal fisheries and transport of goods.

Further publication and use of this report is decided by the recipient.

Our reference: 2020 06 06 – **Method, sources, terms and abbreviations**

Date of issue: 25 July 2020

Recipient:

This report was requested by the Ministry of Foreign Affairs, [the Section for Section for Treaty Law, Environmental Law and Law of the Sea](#)

The order was received on 19 June 2020.

Executive officer(s): 2001, 2002 and 2007

Phone: + 47 789 89 898

Commented [UD1]: Er det mulig å legge inn en beskrivelse av hva Analyseheten er, eksempelvis som en fotnot epå første side?

Table of contents:

Table of contents:.....	1
Pictures and tables	32
1. Terms and abbreviations	43
1.1 Abbreviations	43
1.2 Terms.....	43
1.3 Sources	54
2. The content of the request.....	54
3. Method used in the reports	54
3.1 The vessels.....	65
3.2 Geographical areas for the reports	87
3.3 Shades of blue in the map	98
3.4 Voyages	98
3.5 Tracking of the voyages.....	119
3.6 Pop up in the screen shots	1413
3.7 Speed less than 6 knots	1544
3.7.1 Speed less than 6 knots during transit	1745
3.8 Enter and exit	1846
4. Explaining the tables used	1917
4.1 The start and end of the voyage.....	1917
4.2 Information about the Norwegian shelf, northbound	1917
4.3 Information about the Russian shelf, northbound.....	2048
4.4 Information about the Norwegian shelf, southbound	2048
4.5 Periods <6 knots in the areas	2149
4.6 Landing information	2149
5. Automatic Identification System (AIS).....	2220
5.1 AIS requirements for vessels.....	2220
5.2 AIS coverage	2220
7. Summary all vessels.....	2324
7.1 "Saldus"	2324
7.2 "Solveiga"	2422
7.3 "Solvita"	2523
7.4 "Senator"	2624
7.5 Summary all vessels	2725

Final comment.....	2825
Attachments	2826

Pictures and tables

Figure 1 "Saldus"	65
Figure 2 "Solveiga"	76
Figure 3 "Solvita"	76
Figure 4 "Senator"	87
Figure 5 The geographical areas for the reports.....	87
Figure 6 The Loop Hole.....	98
Figure 7 Example of a voyage to the Loop Hole.....	109
Figure 8 The voyage to the Fisheries Protection Zone around Svalbard.....	109
Figure 9 Example of an over-viewing screen shot for one voyage.....	1140
Figure 10 Over-viewing screen shot as shown in the reports	1241
Figure 11 Example of vessel movements in the Russian shelf of the Loop Hole	1342
Figure 12 Example of vessel movements in the Norwegian shelf of the Loop Hole.....	1342
Figure 13 Example of a pop up	14
Figure 14 Catching operation speed <6 knots and > 6 knots	1645
Figure 15 Transit speed< 6 knots	1746
Figure 16 Enter and exit area	1847
Figure 17 Start and end of the voyage	1948
Figure 18 Norwegian Continental Shelf, northbound	1948
Figure 19 Russian Continental Shelf, northbound.....	2049
Figure 20 Norwegian Continental Shelf, southbound	2049
Figure 21 Periods <6 knots in the areas	2120
Figure 22 Landing information	2120
Figure 23 Base stations for receiving AIS signals in Northern Norway and the Bear Island	2224
Figure 24 "Saldus"	2322
Figure 25 "Solveiga"	2423
Figure 26 "Solvita"	2524
Figure 27 "Senator"	2625

1. Terms and abbreviations

This report's ~~main purpose is to clarify~~ ~~ies for~~ the terms and abbreviations used in the reports concerning snow crab activities of SIA North Star's vessels «Saldus» YL2888, «Solveiga» YL2982, «Solvita» YL2843 and «Senator» YLAC.

This report also includes a short summary of the findings for ~~each of~~ the vessels separately and jointly. ~~and a summary of the four vessels in comparison.~~

1.1 Abbreviations

- **AIS** – *Automatic Identification System* – ~~anti-collision~~ anti-collision system within shipping. Vessels equipped with AIS are sending out and exchanging information about their identity, position, speed and course through radio signals.
- **CS** – *Call Sign* – number identifying the sender of a radio message.
- **EEZ** – *Exclusive Economic Zone* – Sea zone over which a state has special rights regarding the exploration and use of marine resources. The zone extends no more than 200 nautical miles out from its coastal baseline.
- **IMO** – *International Maritime Organization* – is the United Nations specialized agency with responsibility for the safety and security of shipping and the prevention of marine and atmospheric pollution by ships.
- **IMO NUMBER** – *International Maritime Organization number* – this number is a part of the International Maritime Organization's identification system for vessels and it consist of seven numbers unique for the vessel.
- **KNOTS** – 1 knot is 1,852 kilometers per hour.
- **MMSI** – *Maritime Mobility Service Identity* – Code of nine numbers identifying the vessel whereas the first three numbers indicates which country the vessel is registered.
- **NEAFC** – *North East Atlantic Fisheries Commission* – the Regional Fisheries Management Organisation (RFMO) for the North East Atlantic. The area covered by the NEAFC Convention stretches from the southern tip of Greenland, east to the Barents Sea, and south to Portugal.
- **NM** – *Nautical Mile* – Maritime measuring for distance. One nautical mile equals to 1852 meters.
- **UTC** – *Universal time* – Specification of time zone. One hour before Norwegian time during winter and two hours before Norwegian time during summer.

1.2 Terms

- **Geometry** – defined geographical area either officially recognized or created by us especially for the case.
- **Landingnotes** – a landingnote is issued by the Norwegian Fishermen's Sales Organization. Landingnotes are issued in cases when sale of the catch do not ~~occur~~ occur after landing, in this case catch of snow crab.
- **Map** – in these reports ~~we have used a~~ polar maps are used. The polar projection is an azimuthal projection drawn to show Arctic and Antarctic areas. It is based on a plane perpendicular to the earth's axis in contact with the North or South Pole.
- **Reefer** – refrigerated cargo ship used for transport of frozen products.
- **Time** – all AIS trackings are done in Central European time (Norwegian local time).

Commented [UD2]: Det kan være pedagogisk med sammendraget først i stedet for til sist. Slik det nå står, kan det se ut til at hovedformålet med denne delrapporten er å klargjøre begrep.

Commented [HES3]: Forskriften om landings- og sluttsedler opererer med disse to sedlene. Landingsseidel er der hvor det landes ved et mottak, og denne skrives under av mottaksstedet og skipperen. Sluttseddel utstedes av kjøperen av fisken. Den utstedes umiddelbart, og uten at det foreligger landingsseidel, dersom fisken allerede omsettes ved landingen. Dersom omsetningen skjer senere utferdiges det først en landingsseidel og så senere en sluttseddel.

Det finnes altså alltid en sluttseddel, men ikke alltid en separat landingsseidel. Det er viktig at det er klart i rapporten hva det er som informasjonen er hentet fra.

Commented [UD4]: Bør presiseres litt: F.eks. «issued by ... based on ? and describes time and date, amount and type of catch,»

- **Transshipment** – when cargo (crab in this case) is moved from one vessel to another before transit to its final destination.
- **Voyage** – a voyage starts when the vessels leaves port, sails up to the Loop Hole or to the Fisheries Protection Zone around Svalbard and ends when the vessels returns to port.

1.3 Sources

- AIS data from the Norwegian Coastal Administration
- Landingnotes (in excel) received from the Norwegian Fishermen's Sales Organization
- Inspections of the vessels received from the Norwegian Coast Guard.
- Norwegian Directorate of Fisheries, databases
- Lloyd's List Intelligence
- Marine Traffic (vessel photos)
- NEAFC port state control scheme

Commented [UD5]: Kun tale om landingssedler eller også sluttsedler?

2. The content of the ~~order~~request

The Latvian company SIA North Star has filed for an arbitration case against Norway ~~forat~~ the ~~ICSID International Centre of Settlement of Investment Disputes~~ (ICSID ~~International Centre of Settlement of Investment Disputes~~) based on a bilateral investment agreement between Latvia and Norway.

In this regard, the Ministry of Foreign Affairs ~~have ordered~~requested an analysis ~~of snow crab harvesting activities in the Barents Sea~~ based on AIS tracking data for SIA North Star ~~the~~ vessels: «Saldus» YL2888, «Solveiga» YL2982, «Solvita» YL2843 and «Senator» YLAC ~~and their activity concerning snow crab catching in the Loop Hole in the Barents Sea.~~

The analysis ~~shall~~ also includes the quantity of snow crab the vessels have caught and the time the vessels have spent respectively ~~tover~~ the Norwegian and ~~tover~~ the Russian Continental Shelves ~~of in~~ the Loop Hole with speed less than 6 knots.

The request was addressed to the Section of Analysis in Vardø, Norway, which is a joint unit of The Norwegian Directorate of Fisheries and the Norwegian Coastal Administration aimed at analyzing available information on movement and activities of vessels and at revealing illegal fisheries and transport of goods.

3. Method used in the reports

~~The section of analysis in Vardø were asked to do an analysis based on AIS tracking for the four vessels «Saldus» YL2888, «Solveiga» YL2982, «Solvita» YL2843 and «Senator» YLAC, belonging to the Latvian company SIA North Star.~~

Methodically, the Section of Analysis ~~we~~ decided to make one report for each of the four vessels listed above. Three of the executive officers ~~at in~~ the ~~s~~Section of ~~a~~A Analysis have been ~~writing~~working ~~on making~~ the reports regarding~~for~~ the vessels.

Executive officer 2002 has had the leading responsibility for the reports concerning the vessels «Saldus» YL2888, «Solveiga» YL2982 and «Senator» YLAC.

Executive officer 2007 has had the leading responsibility for the report concerning the vessel «Solvita» YL2843.

Executive officer 2001 has been helping out wherever needed.

3.1 The vessels

The vessels «Saldus» YL2888, «Solveiga» YL2982, «Solvita» YL2843 and «Senator» YLAC are the objects ~~for~~^{of} the reports.

Figure 1 "Saldus"



"Saldus", IMO 8423155, MMSI 275460000 and ~~call sign~~^{call sign} YL2888.

Figure 2 "Solveiga"



"Solveiga", IMO 8520173, MMSI 273377520 and ~~callsign~~call sign YL2982

Figure 3 "Solvita"



"Solvita", IMO 8721765, MMSI 275444000 and ~~callsign~~call sign YL2843.

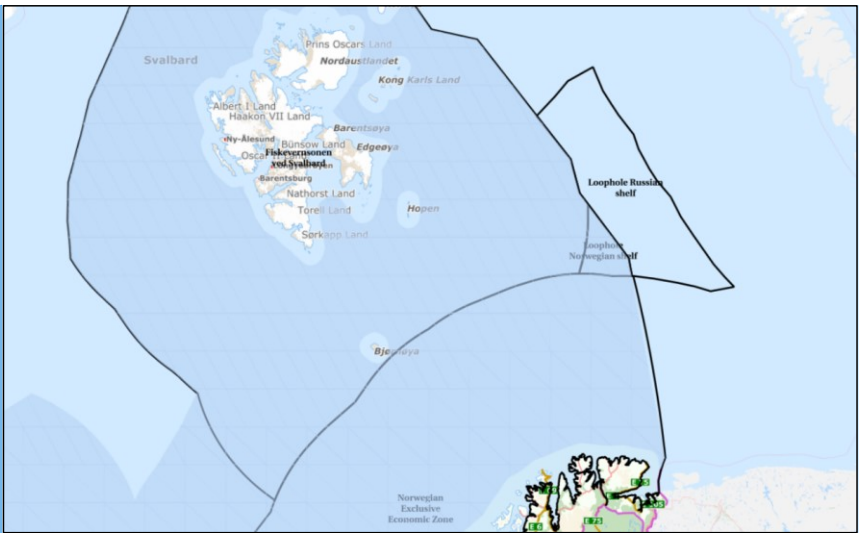
Figure 4 "Senator"



"Senator", IMO 6812986, MMSI 275171000 and ~~callsign~~call sign YLAC.

3.2 Geographical areas for the reports

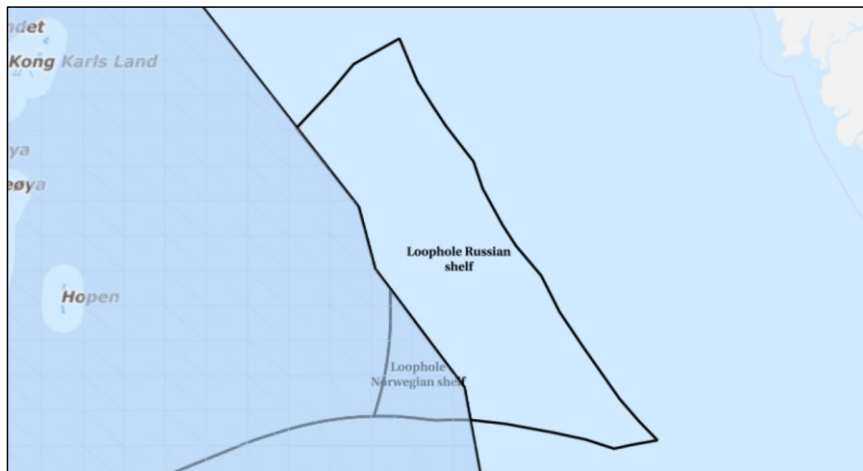
Figure 5 The geographical areas for the reports



Commented [UD6]: Er teksten «fiskevernsonen ved Svalbard» automatisk generert, eller er det mulig å endre til «Fisheries Protection Zone around Svalbard» og flytte slik at den står i havområdet, ikke over øygruppa?

The geometries (areas of jurisdiction) covered in the reports are: the Norwegian Exclusive Economic Zone, the Fisheries Protection Zone around Svalbard and the Loop Hole in the Barents Sea.

Figure 6 The Loop Hole



The Loop Hole in the Barents Sea. This area is the area of the Barents Sea that lies beyond the 200 nautical miles from the baselines of Norway and the Russian Federation respectively. The water column is thus beyond national jurisdiction. The sea floor, however, is continental shelf under the national jurisdiction of Norway and the Russian Federation respectively. Norway and the Russian Federation agreed the delimitation of the continental shelf in a treaty of 2010 and the Norwegian and the Russian EEZs. The Loop Hole is delimited into the Norwegian Continental Shelf and the Russian Continental Shelf. Around Approximately 90 % of the Continental Shelf in the Loop Hole is under Russian jurisdiction.

3.3 Shades of blue in the map

There are two different shades of blue color in the polar map used. The slightly darker blue color on the left side of the map covers the Norwegian Exclusive Economic Zone, the Fisheries Protection Zone around Svalbard and the part of the Loop Hole consisting of the Norwegian Continental Shelf.

The slightly lighter blue color on the right side of the map covers the Russian Exclusive Economic Zone and the part of the Loop Hole consisting of the Russian Continental Shelf.

The two different shades of blue divides the Norwegian Continental Shelf and the Russian Continental Shelf. The shade of blue on the left side of the map illustrates the Norwegian Continental Shelf and the shade of blue to the right in the map illustrates the Russian Continental Shelf.

3.4 Voyages

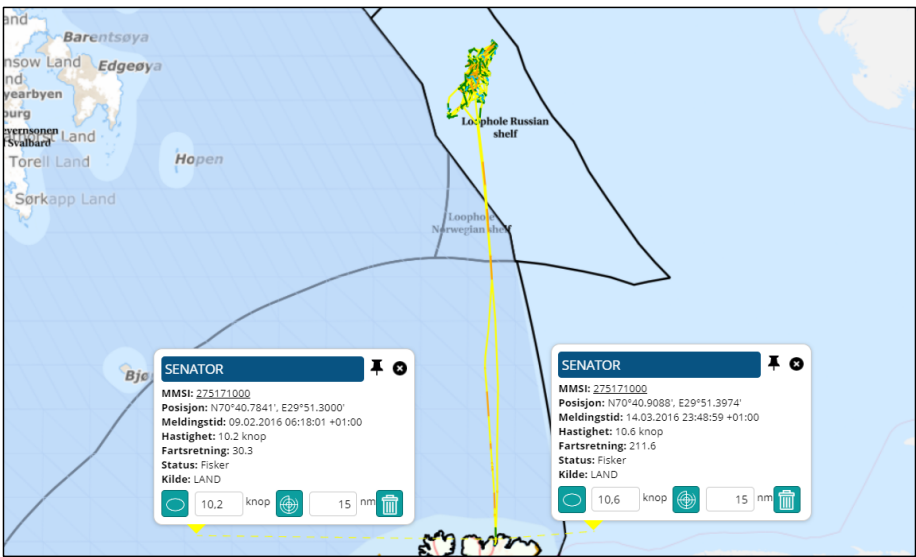
The vessels' landing notes received from the Norwegian Fishermen's Sales Organization were used as starting points in order to establish guidelines for us to find out when and from which port the

Commented [UD7]: Er det mulig å være tydeligere på hvem som har uestedt disse sedlene? Det har betydning for bevisverdien av informasjonen som er oppgitt.

voyages started, ~~from which port the voyages started, as well as~~ when ~~and in which port~~ the voyages ended ~~and in which port~~.

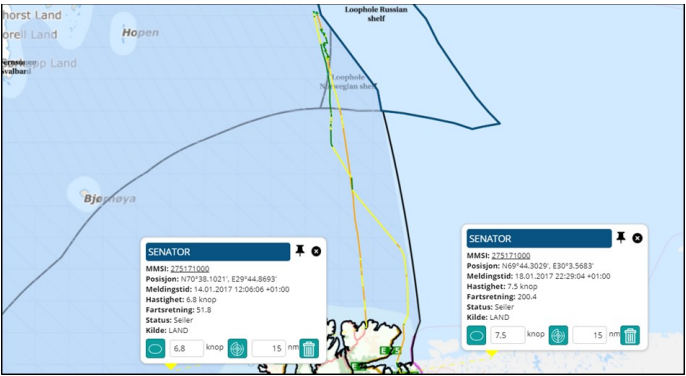
~~Most~~All of the voyages, with the exception ~~from of~~ one, ~~all~~ went to the Loop Hole in the Barents Sea. The one voyage that did not go to the Loop Hole was “Senator’s”-s voyage to the Fisheries Protection Zone around Svalbard in January 2017.

Figure 7 Example of a voyage to the Loop Hole



The screen shot in the map above gives an example of one of the voyages to the Loop Hole. On this voyage “Senator” left Båtsfjord port on 9 February 2016 for the Loop Hole and returned to Båtsfjord Port on 3 March 2016. This is also an example of a voyage starting and ending in the same port.

Figure 8 The voyage to the Fisheries Protection Zone around Svalbard



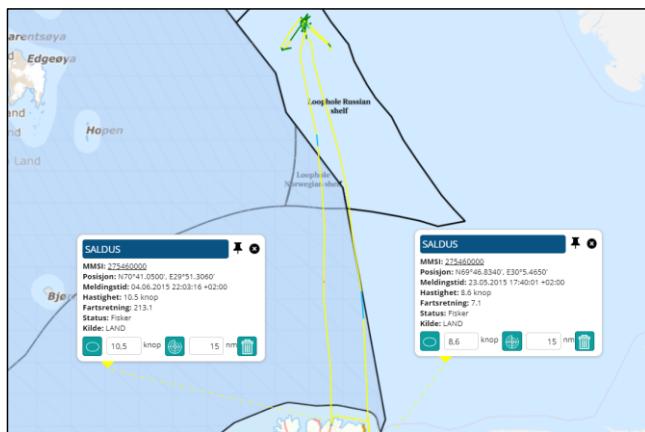
The screen shot in the map above shows “Senator”-s voyage to the Fisheries Protection Zone around Svalbard. “Senator” left Båtsfjord port on 14 January 2017 for the Fisheries Protection Zone around

Svalbard and returned to Kirkenes Port on 18 January 2017. This voyage is an example of a voyage starting from one port and ending in another port. As mentioned above, this is the only voyage with the Fisheries Protections Zone around Svalbard as its destination.

3.5 Tracking of the voyages

Each voyage the vessels have had to the Loop Hole or the Fisheries Protection Zone around Svalbard are documented by screen shots in the reports. Each voyage is normally shown in two screen shots. The first screen shot is an overviewing shot of the entire voyage, from the vessel left port to the vessel was back in port. The screen shot is shown in a polar map.

Figure 9 Example of an overviewing screen shot for one voyage

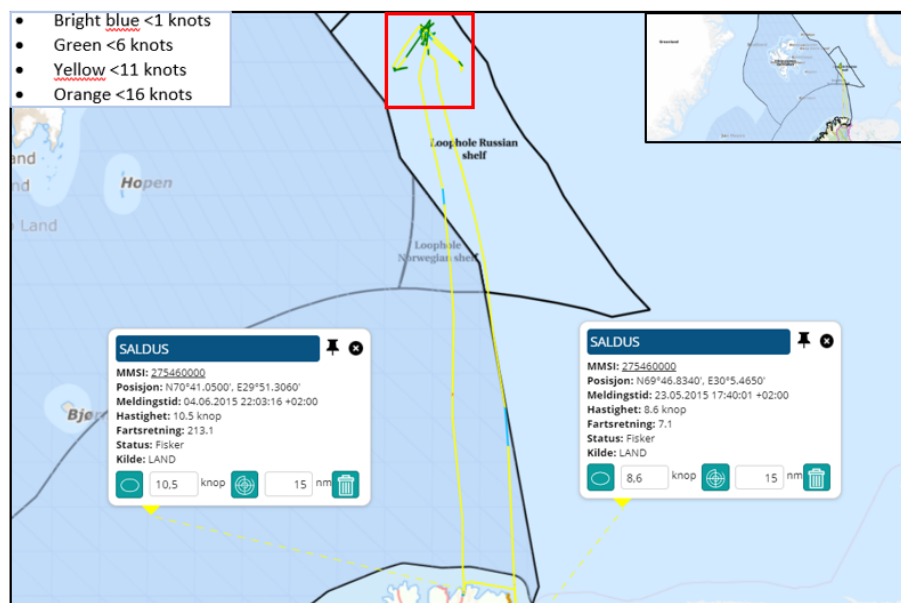


The screen shot in the map above is an example of an overviewing shot for one of the voyages. The example shows «Saldus»-s voyage leaving Kirkenes port 23 May 2015 and returning to Båtsfjord port 4 June 2015. The departure and arrival information is given in the pop ups included. As seen, the AIS tracking is given in different colors. The meaning of the different colors will be explained in the text below.

Commented [UD8]: Er det hensiktsmessig å benytte akkurat denne turen, som ifølge beskrivelsen ovenfor er den eneste til fiskerivernsonen, for å illustrere en reise som starter i en havn og ender i en annen? Kan denne delen tas ut, eventuelt erstattes med omtale av en annen tur?

Commented [UD9]: Slik det når står kan det se ut til at det var flere tokt til fiskevernsonen. Kan dette omformuleres slik at det er helt tydelig at dette innebærer et unntak, men samtidig synliggjør at det ville blitt fanget opp om det hadde vært mer enn en. Et forsøk på omformulering er lagt inn.

Figure 10 Overviewing screen shot as shown in the reports



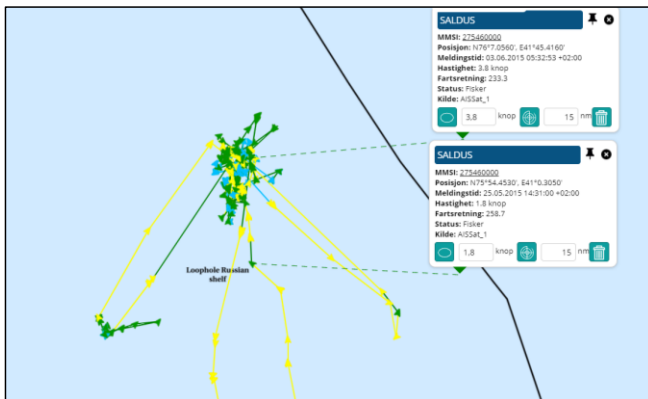
The screen shot above is what the overviewing screen shot *actually* looks like in the reports. In this shot we have included a small map of the reference area in the box in the upper right corner. The reference area stretches from Greenland to the Kara Sea.

The box included in the upper left corner gives the color coding of the AIS tracking. These colors indicate the speed the vessel has had and where.

The red square in the upper middle gives the reference area for the next screen shot included in the report. This red square focuses on the catching activity the vessel has had, or the possible catching activity the vessel might have had in the area marked.

The second screen shot for the voyage shows the vessel movements in the catching operation, or the possible catching operation the vessel has had. This screen shot is also shown in a polar map.

Figure 11 Example of vessel movements in the Russian shelf of the Loop Hole

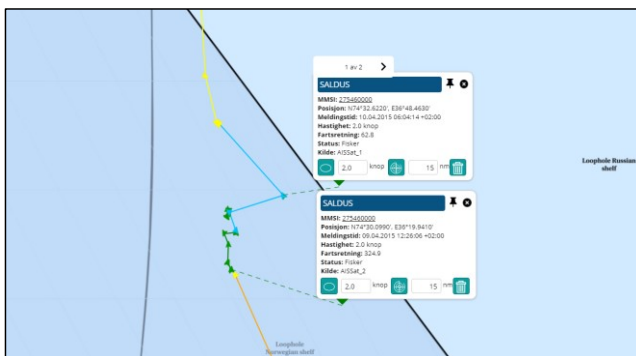


The screen shot in the map above is an example of one of “Saldus”’s catching operations on the Russian shelf in the Loop Hole. Information about the times and dates for when “Saldus” was speeding 6 knots and less in the area is given in the pop ups. Since most of the catching activity for the vessels found took place in the Russian shelf of the Loop Hole, it was considered we found it sufficient to show the voyage in two screen shots for most of the voyages.

Commented [UD10]: Her står det «most of», men siden bildet viser at all fiskeriaktivitet foregikk i Smutthullet på russisk sokkel bør det stå dette.

On some voyages the speed and maneuvers of the vessel could indicate also had catching operations, or possible catching operations, on the Norwegian shelf in the Loop Hole. For these voyages the reports also include a screen shot of the vessel’s movements over the Norwegian shelf in the Loop Hole. On voyages where the vessel had fishing operations, or possible fishing operations on both the Russian Shelf of the Loop Hole and in the Norwegian Shelf of the Loop Hole, the report will contain three screen shots of the voyage.

Figure 12 Example of vessel movements in the Norwegian shelf of the Loop Hole



The screen shot in the map above is an example of one of “Saldus”’s catching operations, or possible catching operations in the Norwegian shelf in the Loop Hole. Also in this screen shot, pop

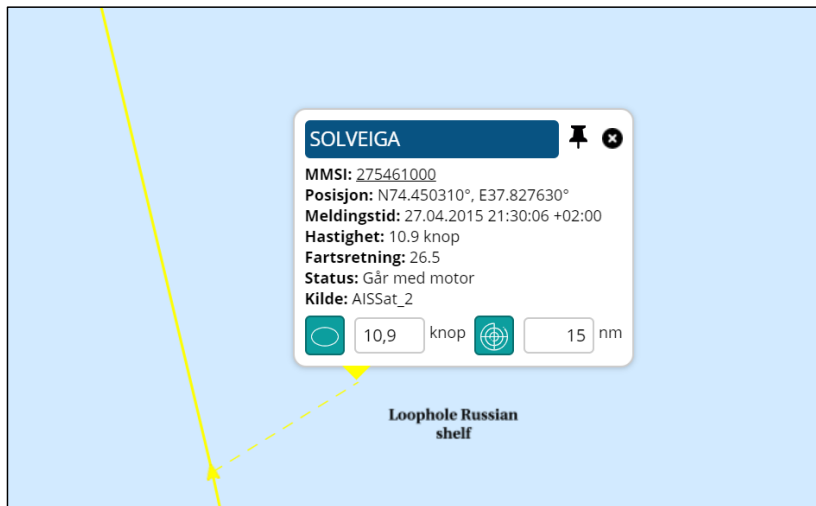
ups are included to give information about the times and dates for when “Saldus” was speeding 6 knots and less in the area.

3.6 Pop up in the screen shots

There is certain information available for each AIS-position registered for the vessel. ~~Certain~~The information for the AIS-positions ~~are singled out and information on speed etc is given~~we want to know more about can be visible by showing it in separate highlighted pop ups in the tracking image.

A pop up with information for one of “Solveiga”-’s AIS-position is included in the tracking image below. This AIS-position is registered ~~in over~~ the Russian Shelf ~~of in~~ the Loop Hole.

Figure 13 Example of a pop up



The information in this pop tells us that this AIS position belongs to the vessel “Solveiga”. “Solveiga” has MMSI number 275461000. The ~~information concerning the vessel’s name and MMSI number is information in which identifies~~ the vessel.

The ~~following next~~ information in the pop up ~~establishes says something about~~ the ~~position for of~~ the vessel at the time of the registration ~~for the AIS position~~. In this case, the position is given in decimal degrees.

~~“Meldingstid”_or~~ the time for the registration of the AIS position, ~~establishes says something about~~ when the AIS position was registered, the date and time. In this specific case, the AIS position was registered 27 April 2015 ~~at time~~ 21:30:06 +02:00. The ~~time~~ “+02:00” indicates that the time is given in Central European time (Norwegian time), 2 hours before UTC time.

~~“Hastighet”_or~~ the speed “Solveiga” had at the time ~~for of~~ the registration of the AIS-position was 10,9 knots.

"Fartsretning" ~~or the direction of speed,~~ provides the direction of ~~gives information about~~ the vessels ~~heading~~ at the time when the AIS position was registered. In this case, "Solveiga" sailed northeast.

Status as described above gives information of that ~~shows that~~ "Solveiga" was underway using engine at the time of the registration of the AIS-position.

"Kilde" ~~or source,~~ shows which AIS satellite (AISSat_2) received ~~gives information of that this AIS-position was registered by an AIS satellite receiver~~ the information.

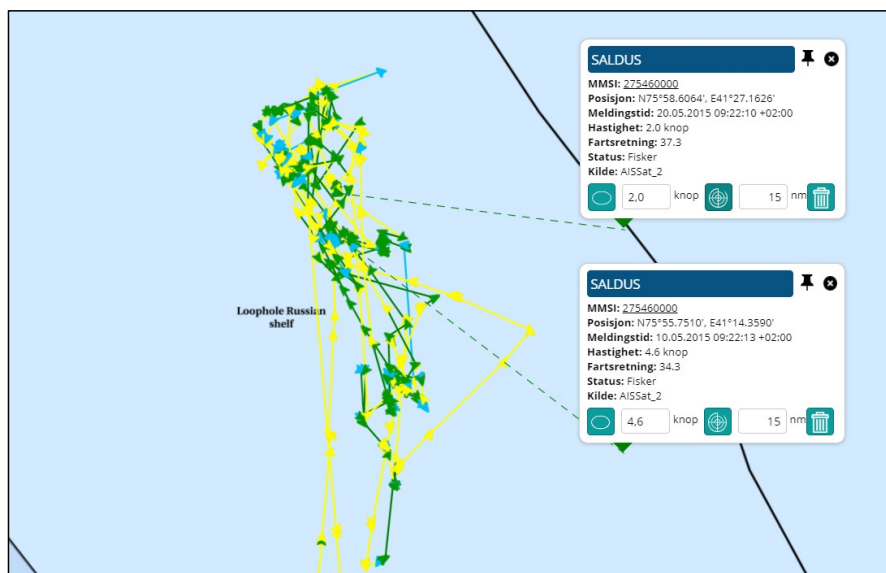
3.7 Speed less than 6 knots

Vessels [usually] cannot conduct snow crab catching activities at speeds higher than 6 knots. Based on the time the vessels have had speed of 6 knots and less in the Loop Hole, we have estimated the time the vessels have been doing catching operations, or possible catching operations in the area. ~~Speed of 6 knots and higher does not allow any kind of fishing operations to have taken place. The speed is simply too high.~~

The vessel can on the same voyage have been ~~over both the Norwegian and Russian~~ on both sides of the shelves in the Loop Hole, as well as over the Russian and the Norwegian Shelf outside the Loop Hole. In those cases ~~we have estimated~~ the times the vessel has had ~~over~~ each shelf with speed 6 knots and less have been calculated.

The times the vessel have had speed 6 knots and less is calculated from the first AIS position the vessel has had in the area with speed 6 knots and less to the last AIS position the vessel has had in the same area with speed 6 knots and less. If the vessel has moved with speed higher than 6 knots in the area in between sessions of catching operation (speed less than 6 knots) the entire period is calculated as the total time of catching operations. The total time of catching operations will therefore in some cases also include some speed higher than 6 knots.

Figure 14 Catching operation speed <6 knots and > 6 knots.



The screen shot above shows “Saldus” ~~is~~ catching operation ~~on~~ the Russian Shelf ~~in~~ the Loop Hole in the period from 10 May 2015 time 09:22 until 20 May 2015 time 09:22. The pop ups include information about the first AIS position “Saldus” had in the area with speed 6 knots and less and information about the last AIS position “Saldus” had in the same area with speed 6 knots and less.

The color of the track indicates that “Saldus” also has had speed higher than 6 knots during this catching operation. During the catching operation “Saldus” had movements with speed both <6 knots and > 6 knots. [This is likely to be transit between locations.](#)

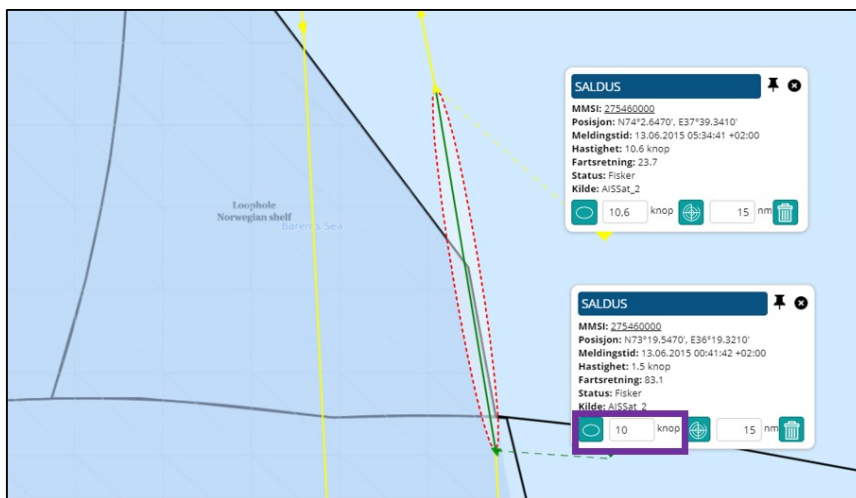
Commented [UD11]: Kan dette forstås som at det har vært fangstaktivitet i høyere fart? Kan en eventuelt skrive at hastighet over 6 knop antas å være transit mellom områdene? Se forslag.

3.7.1 Speed less than 6 knots during transit

On some voyages the tracking of the vessel shows that the vessel has moved with speed < 6 knots during transit to or from catching areas. This may be due to weather conditions, technical conditions or other conditions on board the vessel.

In cases where the vessel's tracking shows speed < 6 knots ~~in~~ over the Norwegian continental shelf ~~of~~ in the Loop Hole, these positions will be shown in separate screen shots in the report. In the cases where the vessel has been moving at low speed in the Norwegian EEZ, this will not be shown in the reports as no catching of snow crab in this zone has been reported.

Figure 15 Transit speed < 6 knots



The example in the screen shot in the map above shows that "Saldus" had one AIS- position < 6 knots in the Norwegian EEZ. "Saldus" ~~is~~ next AIS-position was registered ~~over~~ in the Russian continental shelf ~~in~~ of the Loop Hole. The green color of the tracking may seem to indicate also show that "Saldus" was having a transit through the Norwegian shelf of the Loop Hole with speed less than 6 knots, but the reason for this is that it is the speed at the registration time which decides the color of the line (here green) until the next - AIS registration.

The time and distance between the two AIS positionregistrations in the Norwegian EEZ and ~~the AIS position in over~~ the Russian continental shelf shown above of the Loop Hole indicate that "Saldus" had an average speed of 10 knots between those points. on this voyage must have moved with a speed of 10 knots between the two AIS positions. The speed of 10 knots is shown in the purple rectangle in the lowermost pop up and the red dotted circle round the green tracking shows the theoretical area "Saldus" may have moved in during this period.

~~If "Saldus" should have moved with speed less than 6 knots, as the color of the tracking indicates, the vessel would not have made it to the next AIS in time for registration of that position. In this case, the color of the track is misleading regarding its color. The color of the tracking is green just because of the time and distance in between the two AIS position and because the AIS position before entering the Norwegian shelf of the Loop Hole was registered with speed less than 6 knots.~~

Commented [UD12]: Er det behov for en forklaring? Eksempelvis få frem at det ikke var snøkrabbe der, at landingsdokumentet sier annet område e.l.?

3.8 Enter and exit

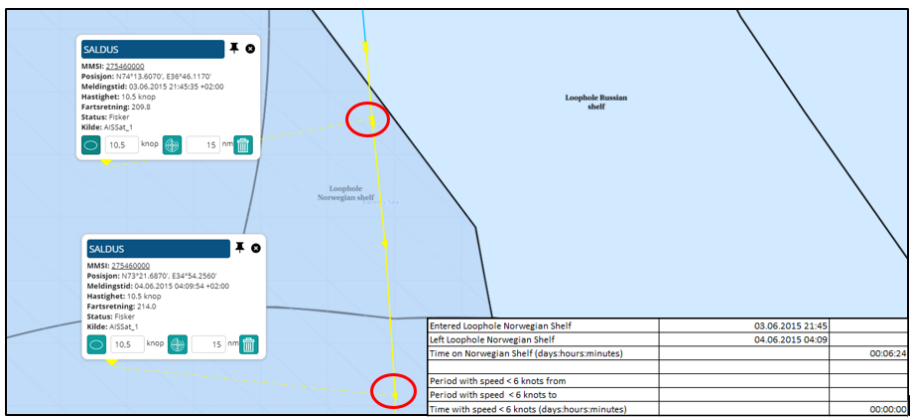
In the reports we use the terms “enter” and “leave” the area for vessels going in or out of the given area. The term leave is used instead of the term exit.

The time for the vessel’s entrance in the area is based on the first registered AIS position for the vessel in the specific area. The time for the vessel’s exit of the area is based on the first registered AIS position the vessel has outside of the specific area.

On some voyages, there can be some time in between the registered AIS-positions for the vessel. The result of that can be that the first AIS position the vessel has in the specific area might be registered while the vessel is quite far into the area. The first AIS position for the vessel after its departure from the area might also not be registered until quite long after the vessel has left the area. The registration of the vessels AIS positions can therefore cause the time the vessel has had in the area to be calculated not so correctly as preferred.

The issue with AIS position registered far apart in time is especially visible for voyages where the vessel has had a transit through the area, as shown in the example below:

Figure 16 Enter and exit area



The screen shot in the map above shows the first AIS- position for “Saldus” on 3 June 2015 time 21:45 ~~in~~over the Norwegian Continental Shelf in the Loop Hole, southbound. This AIS position is registered some time after “Saldus” entered the area. The first AIS-position for “Saldus” after the vessel left the Norwegian shelf of the Loop Hole is registered on 4 June 2015 time 04:09 in the Norwegian EEZ. This AIS position is registered some time after the vessel left the area. For this voyage, the time “Saldus” has been ~~in~~over the Norwegian Continental Shelf in the Loop Hole will not be entirely correct due to the registration apart in time for the AIS positions.

Commented [UD13]: Kan vi si noe om betydningen? Her er det gult hele veien, så kan vi si noe a la: “Here, however the data show that the speed of the vessel has been too high to allow for any snow crab harvesting activities.” Evt også “Also elsewhere in the report, such inaccuracies will not have affected the calculations regarding on which continental shelf crabbing operations have taken place”? Det må selvsagt absolutt ikke skrives om det ikke stemmer, men stemmer det, kan det være nyttig.

4. Explaining the tables used

In the reports we have used tables to sum up the voyage information at the end of each voyage. There is one table for each of the vessel's voyages. The tables used are all the same, the sections of the vessel's presence in the Loop Hole will however vary as the vessels have had different numbers of entrances and exits to the shelves in the Russian and Norwegian part of the Loop Hole.

4.1 The start and end of the voyage

Figure 17 Start and end of the voyage

Voyage started from Båtsfjord port	Voyage ended in Svartnes port
08.04.2015	13.04.2015

The first section of the table gives information about the port of departure and the date of departure, as well as the port of arrival and the date of arrival.

[The format is DD-MM-YYYY.](#)

4.2 Information about the Norwegian shelf, northbound

Figure 18 Norwegian Continental Shelf, northbound

Entered Loophole Norwegian Shelf	09.04.2015 07:38	
Left Loophole Norwegian Shelf	10.04.2015 11:08	
Time on Norwegian Shelf (days:hours:minutes)		01:03:30
Period with speed < 6 knots from	09.04.2015 12:26	
Period with speed < 6 knots to	10.04.2015 06:05	
Time with speed < 6 knots (days:hours:minutes)		00:17:38

The second section of the table gives information about the date and time for when the vessel entered the Norwegian shelf ~~in~~ the Loop Hole, northbound. It also gives information about the date and time for the vessel's exit. Then, the time given in days, hours and minutes the vessel has had ~~in~~ the Norwegian Continental Shelf in the Loop Hole is shown. On this voyage the vessel has been ~~in~~ the Russian shelf ~~in~~ the Loop Hole for 1 day, 3 hours and 30 minutes.

This section also gives information about the date and time the vessel had speed < 6 knots ~~in~~ the Norwegian Continental Shelf ~~in~~ the Loop Hole. The period the vessel has had with speed less than 6 knots also appears in days, hours and minutes. On this voyage the vessel has had speed less than 6 knots in the area for a total of 17 hours and 38 minutes.

If the vessel has no AIS tracking ~~in~~ the Norwegian shelf ~~in~~ the Loop Hole northbound, the text **NO TRACKS IN ZONE** will appear in this section. If the vessel has tracks ~~in~~ the ~~zone~~area, but no registered AIS positions here, the text NO AIS-POSITIONS will appear.

Commented [V114]: Er det uheldig å bruke "zone" her? Kunne ein i staden brukt "area"? Alternativt berre "No tracks"?

4.3 Information about the Russian shelf, northbound

Figure 19 Russian Continental Shelf, northbound

Entered Loophole Russian Shelf	10.04.2015 11:08	
Left Loophole Russian Shelf	12.04.2015 09:48	
Time on Russian Shelf (days:hours:minutes)		01:22:40
Period with speed < 6 knots from	10.04.2015 19:04	
Period with speed < 6 knots to	11.04.2015 22:31	
Time with speed < 6 knots (days:hours:minutes)		01:03:27

The third section of the table gives information about the date and time for when the vessel entered the Russian shelf ~~in~~ the Loop Hole, northbound. It also gives information about the date and time for the vessel's exit. Then, the time given in days, hours and minutes the vessel has had ~~in~~ over the Russian Continental Shelf in the Loop Hole is shown. On this voyage the vessel has been ~~over~~ in the Russian shelf ~~in~~ the Loop Hole for 1 day, 22 hours and 40 minutes.

This section also gives information about the date and time the vessel had speed < 6 knots ~~in~~ over the Russian continental shelf ~~in~~ the Loop Hole. The period the vessel has had with speed less than 6 knots also appears in days, hours and minutes. On this voyage the vessel has had speed less than 6 knots in the area for a total of 1 day, 3 hours and 27 minutes.

If the vessel has no AIS tracking ~~in~~ over the Russian shelf ~~in~~ the Loop Hole northbound, the text **NO TRACKS IN ZONE** will appear in this section. If the vessel has tracks in the ~~area~~ zone, but no registered AIS positions here, the text NO AIS-POSITIONS will appear.

Commented [VI15]: Sjø merknad over.

4.4 Information about the Norwegian shelf, southbound

Figure 20 Norwegian Continental Shelf, southbound

Entered Loophole Norwegian Shelf	12.04.2015 09:48	
Left Loophole Norwegian Shelf	12.04.2015 18:19	
Time on Norwegian Shelf (days:hours:minutes)		00:08:31
Period with speed < 6 knots from		
Period with speed < 6 knots to		
Time with speed < 6 knots (days:hours:minutes)		00:00:00

The fourth section of the table gives information about the date and time for when the vessel entered the Norwegian shelf ~~in~~ the Loop Hole, southbound. This is normally when the vessel returns from catching operations ~~in~~ on the Russian shelf ~~in~~ the Loop Hole, going back to port.

This section has the same kind of information as section 2 and section 3. See these sections for further information and explanation.

4.5 Periods <6 knots in the areas

Figure 21 Periods <6 knots in the areas

Hours on Norwegian Shelf < 6 knots	17,38
Hours on Russian Shelf < 6 knots	27,27
Total hours < 6 knots	44,65
Percent time on Russian Shelf < 6 knots	61,08 %
Percent time on Norwegian Shelf < 6 knots	38,92 %

The fifth section of the table gives information about the number of hours the vessel has had speed < 6 knots ~~in~~over the Norwegian Continental Shelf ~~of~~in the Loop Hole and ~~in~~over the Russian Continental Shelf ~~of~~in the Loop Hole. The periods of speed < 6 knots are also compatible with catching operations the vessel has had, or possible catching operations the vessel has had in the area.

The last two rows give information about the percentage of the total time the vessel has had ~~in~~over the Russian Continental Shelf ~~of~~in the Loop Hole and ~~in~~over the Norwegian Continental Shelf ~~of~~in the Loop Hole.

4.6 Landing information

The owner or user of a harvesting or transport vessel and the one that receives the catch shall complete a landing note with information on the catch. This applies regardless of whether the catch is transferred to a land-based facility, and to another vessel or to storage in the sea.

Figure 22 Landing information

Snow crab landed live in kg	50 000	
Factory (crab receiver)	Seagourmet Norway AS, Båtsfjord	
Landingnote number and date	10428779	11.06.2015

The sixth section of the table gives information about how many kilos of snow crab in live weight the vessel landed on this voyage. It also gives information about the receiver of the crab. The landing-note is identified with a unique number and the date is given for when the landingnote from the Norwegian Fishermen's Sales Organization was issued.

Commented [UD16]: Her eller et annet sted vil det være nyttig med en enda mer presis forklaring av hva en landingnote er. Herunder klargjøre om det kun er tale om informasjon fra landingsedel eller også sluttседel, og om dato som benyttes er for landingen.

5. Automatic Identification System (AIS)

5.1 AIS requirements for vessels

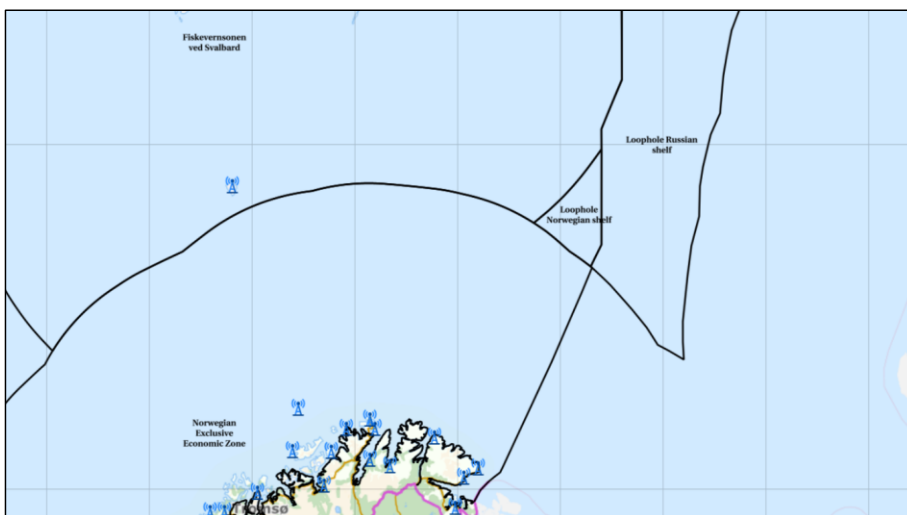
AIS is required for all vessels gross tonnage 300 and more. This requirement comes from IMO and is given regardless of the classification or the nationality of the vessel or where the vessel is sailing.

«Saldus» YL2888, «Solveiga» YL2982, «Solvita» YL2843 and «Senator» YLAC all have gross tonnages over more than 300, ~~in~~ which requires them to have an AIS antenna installed and turned on at all times while the vessel is underway and while it is doing fishing operations.

5.2 AIS coverage

To be able to download the AIS signals vessels are sending out, a receiver of the AIS-signals is needed. The Norwegian Coastal Administration has established several base stations along the Norwegian coastline in order to receive AIS signals. The coverage area for the land based AIS receivers are limited to reach 40 to 50 nautical miles off the coastline.

Figure 23 Base stations for receiving AIS signals in Northern Norway and the Bear Island



The screen shot in the map above shows the landbased AIS- receivers in Northern Norway and on the Bear Island. The landbased base stations do not have long enough reach to collect AIS signals from the Loop Hole.

The Norwegian Coastal Administration has since 2010 had access to AIS signals received by satellites. AIS signals beyond 40 to 50 nautical miles off the coast are being picked up by AIS satellites. This means that all AIS positions the vessels «Saldus» YL2888, «Solveiga» YL2982, «Solvita» YL2843 and «Senator» YLAC have in the Loop Hole or in the Fisheries Protection Zone around Svalbard have been downloaded from AIS satellites.

7. Summary all vessels

7.1 "Saldus"

Figure 24 "Saldus"



"Saldus" arrived in Norway and Båtsfjord port on 27 March 2015. From 8 April 2015 until 3 September 2016 "Saldus" was catching snow crab (*Chionoecetes opilio*) in the Loop Hole in the Barents Sea. All together "Saldus" is listed with 22 landing notes for snow crab. We have tracked "Saldus" to have 22 voyages where the vessel was catching snow crab. For one of the voyages the AIS tracking shows possible catching activity for "Saldus" ~~on~~ⁱⁿ the Norwegian Shelf ~~of~~ⁱⁿ the Loop Hole. For the rest of the voyages the tracking shows that the catching of snow crab ~~took place~~^{has found place} ~~in~~^{on} the Russian Shelf ~~in~~^{of} the Loop Hole.

A total of 653 897 kilos snow crab was landed live in the ports of Båtsfjord and Vardø. 1 535 kilos of the total amount of live snow crab ~~may~~^{can relate to the} ~~come from~~^{possible catching activity} ~~on~~ⁱⁿ the Norwegian Shelf ~~in~~^{of} the Loop Hole.

After ending snow crab catching in the Loop Hole "Saldus" was in the period from August 2018 to March 2019 catching prawns (*Pandalus borealis*) in the Loop Hole ~~and in the Norwegian Shelf~~. The catches of prawns were delivered live in Båtsfjord port.

"Saldus" has also had a voyage to Archangelsk in Russia lasting from September 2019 until January 2020. The rest of the time has "Saldus" been laid up in Båtsfjord Port, where the vessel is still laid up.

"Saldus" has been inspected by Norwegian authorities four times.

Commented [UD17]: Her vil det være nyttig å få presisert datoen for denne fangstaktiviteten på norsk sokkel, og sammenholde med hva den relevante sluttseddelen sier om hvor de hadde fangstet på akkurat denne turen.

Commented [UD18]: Dette er veldig nyttig informasjon. Det viser tydelig at disse fartøyene kan benyttes, og har vært/blir benyttet, til annet enn snøkrabbefangst på norsk sokkel.

Det hadde kanskje også vært nyttig å presisere under hvert fartøy at de ikke har fangstet i firskevernsonen ved Svalbard - bortsett fra for den ene turen til Senator.

7.2 "Solveiga"

Figure 25 "Solveiga"



"Solveiga" arrived in Norway and Båtsfjord port on 20 March 2015. From 31 March 2015 until 5 September 2016 "Solveiga" was catching snow crab (*Chionoecetes opilio*) in the Loop Hole in the Barents Sea. All together "Solveiga" is listed with 34 landingnotes for snow crab. We have tracked "Solveiga" to have 31 voyages where the vessel was catching snow crab. «Solveiga» had no voyages with possible catching activity on the Norwegian Shelf in the Loop Hole.

«Solveiga» was catching a total of 1 388 075 kilo live snow crab in the Loop Hole and the crab was landed live in the ports of Båtsfjord, Vardø and Kjøllefjord. All the snow crab was caught in the Russian shelf of the Loop Hole.

"Solveiga" had two more voyages to the Loop Hole after ending snow crab catching on September 5th 2016. "Solveiga" had no catch on these two voyages. The rest of the time until December 5th 2017, "Solveiga" was laid up in Båtsfjord port. Under Russian flag, «Solveiga» sailed to South Korea with arrival at the end of January 2018. Since February 2018 "Solveiga" has been operating in the Bering Sea and the Okhotsk Sea.

"Solveiga" has not been inspected by Norwegian authorities.

Commented [UD19]: Har vi noen informasjon om hva fartøyet gjorde?

7.3 "Solvita"

Figure 26 "Solvita"



"Solvita" arrived in Norway and Båtsfjord port on 17 January 2014. From 26 July 2014 until 9 September 2016 "Solvita" was catching snow crab (*Chionoecetes opilio*) in the Loop Hole in the Barents Sea. All together "Solvita" is listed with 39 landingnotes for snow crab. We have tracked "Solvita" to have 39 voyages where the vessel was catching snow crab. «Solvita» had no voyages with possible catching activity ~~in~~on the Norwegian Shelf ~~of~~in the Loop Hole.

Commented [UD20]: Kan det legges inn omtale av dette fartøyet på samme mot som for øvrige fartøyene? Dvs få frem at fangsten var på russisk sokkel og gjerne skrive hva fartøyet gjør nå.

7.4 "Senator"

Figure 27 "Senator"



"Senator" arrived in Norway and Båtsfjord port on 19 May 2015. From 20 May 2015 until 8 September 2016 "Senator" was catching snow crab (*Chionoecetes opilio*) in the Loop Hole in the Barents Sea. All together "Senator" had ten landings and five transshipments of snow crab. The transshipments were to the reefers «Nikolay Kasatkin» UEFY and «Nadir» UEVR. The landings found place in Båtsfjord port. We have tracked "Senator" to have 10 voyages where the vessel was catching snow crab. "Senator" had one voyage with possible catching activity oin the Norwegian Shelf efin the Loop Hole.

«Senator» was catching a total of 1 956 214 kilos snow crab in the Loop Hole. The crab was landed or transshipped frozen in clusters. 2 520 kilos of the total amount of the snow crab can relate to possible catching activity ion the Norwegian Shelf efin the Loop Hole. The rest of the snow crab was caught ion the Russian shelf efin the Loop Hole.

After ending snow crab catching in September 2016, "Senator" had one voyage to the Loop Hole in October 2016. No catch of any kind on was landed after that voyage. Between 14 January and 18 January «Senator» had one voyage to the Fisheries Protection Zone around Svalbard. During this voyage «Senator» was arrested by «KV Svalbard» and escorted to Kirkenes port. «Senator» was laid up in Kirkenes port until 24 March 2017.

With the exception of the voyage to the Loop Hole in October 2016 and the voyage to the Fisheries Protection Zone around Svalbard in January in 2017 with the following lay up in Kirkenes port, "Senator" has since the ending of the catching of snow crab in the Loop Hole been laid up in Båtsfjord port. "Senator" is still laid up in Båtsfjord port.

"Senator" has been inspected by Norwegian authorities five times.

Commented [UD21]: Hva er flaggstat og rederi for disse fartøyene?

Commented [UD22]: Er oppbringelsen i 2016 knyttet til dette toktet?

Commented [UD23]: Er dette den fangsten som fartøyet ble arrestert for i 2016?

7.5 Summary all vessels in comparison

Catch of snow crab:

“Saldus”: A total of 653 897 kilos snow crab was landed live in the ports of Båtsfjord and Vardø.

1 535 kilos of the total amount of live snow crab can relate to the possible catching activity in the Norwegian Shelf of the Loop Hole. The rest of the catch was caught ~~in~~ on the Russian shelf ~~of~~ in the Loop Hole.

«Solveiga»: A total of 1 388 075 kilos live snow crab was landed live in the ports of Båtsfjord, Vardø and Kjøllefjord. All the snow crab was caught ~~in~~ on the Russian shelf ~~of~~ in the Loop Hole.

“Solvita”:

“Senator”: A total of 1 956 214 kilos snow crab was landed in Båtsfjord port or transshipped to the reefers «Nikolay Kasatkin» UEFY and «Nadir» UEVR. All catch of snow crab was landed or transshipped frozen in clusters. 2 520 kilos of the total amount of snow crab can relate to the possible catching activity in the Norwegian Shelf of the Loop Hole. The rest of the catch (1 953 694 kilos) was caught ~~in~~ on the Russian Continental Shelf shelf of in the Loop Hole.

All four vessels: The four vessels have in total caught 5 355 982 kilos snow crab in live weight in the Loop Hole. Of this amount we have estimated that 3 870 kilos of the snow crab in live weight can have been caught ~~on~~ in the Norwegian Shelf ~~in~~ of the Loop Hole.

Snow crab condition:

“Senator” was the only vessel landing and transshipping frozen snow crab. The other three vessels landed live snow crab in ports in Finnmark.

“Senator” is the only vessel with a voyage to the Fisheries Protection Zone around Svalbard. The rest of the voyages for all the vessels went to the Loop Hole.

Inspections:

Of the four vessels, “Saldus” and “Senator” have been inspected by Norwegian authorities. “Saldus” has been inspected four times, while “Senator” has been inspected five times. There were no remarks to the inspections of “Saldus” ~~while “Senator” has been sentenced in court.~~

“Senator” was arrested twice for illegally catching snow crab on the Norwegian’s continental shelf. The first time, on 17 January 2016 after inspection in the port of Båtsfjord, due to illegally catching snow crab on the Norwegian’s continental shelf in the Loop Hole. The fines were accepted and paid by the captain and by SIA North Star. The second time, on 16 September 2017, for illegally catching snow crab in the Fisheries Protection Zone. The captain and SIA North Star was later sentenced.

Commented [UD24]: Hvis vi tar totalsummen angitt under og trekker fra angitte landinger for de tre andre, kommer vi til totalt 1.357.796 for Solvita.

Commented [UD25]: Hvordan går dette opp med tallene oppgitt for Senator og Saldus over (2 520+1 535= 4 055)

Hva blir prosentandelen som er fangstet på russisk side?

Når det står «live weight» omfatter dette da også det som er levert til omlasting, dersom a) Reefer leverer til Norge, og b) Reefer leverer direkte til utlandet?

Commented [UD26]: Kan det sies noe om forholdet mellom «live weight» opp mot «frozen» som nevnt over?

Commented [UD27]: Det bør her fremgå hvor mange av disse inspeksjonene som er ute på feltet, og hvor mange som er havnestatskontroller.

Commented [VI28]: Her bør det kanskje stå “on the Norwegian continental shelf in the Fisheries Protection Zone”?

Report from the Section of Analysis in Vardø

[Final comment](#)

[Attachments](#)

[PSC 1 and PSC 2](#)

[All AIS-positions](#)