Enhancing vessel identification in GFCM: The need to strengthen IMO number standards









INTRODUCTION

Since 2013, when fishing vessels became eligible to apply for International Maritime Organisation (IMO) numbers, these seven-digit identifiers have gained global recognition as an invaluable tool for vessel identification. Unlike call signs, names, flags, or other registration numbers, IMO numbers remain consistent and permanent throughout a vessel's lifecycle, from construction to dismantling. They need to be displayed clearly on the vessel's hull or superstructure. Managed by S&P Global Market Intelligence at no cost, IMO numbers play a crucial role in monitoring and controlling efforts by the authorities of flag, coastal and port states, and Regional Fisheries Management Organizations (RFMOs).

IMO numbers are currently applicable to fishing vessels, refrigerated cargo vessels or supply vessels over 100 gross tonnage (GT). Other eligible vessels include motorised fishing vessels of 12 meters or more of length overall (LOA), which are authorised to operate outside the waters of national jurisdiction.²

Concerning the General Fisheries Commission for the Mediterranean (GFCM), Resolution GFCM/41/2017/6³ initially mandated IMO numbers for fishing vessels of 24 metres and above of LOA fishing in the GFCM area. Its scope has since been amended to 20 metres and avobe of LOA through Resolution GFCM/44/2021/6⁴. However, under the GFCM framework, resolutions are not legally binding. In addition, a 2017 IMO resolution⁵ called on governments to implement the IMO ship identification number scheme for vessels of 100 GT and above, and fishing vessels of 12 metres and above.

Therefore, we urge the GFCM to extend the IMO number requirement to vessels operating in the Convention Area with a length of 12 metres and above of LOA, and to make this requirement legally binding through the adoption of a Recommendation.

It is unacceptable that despite IMO numbers being accessible at no cost, the current IMO number requirement remains non-binding for the GFCM. Making the allocation of IMO numbers a requirement would bring the GFCM in line with most other RFMOs, which have already established IMO number requirements for vessels above 12 metres of LOA. We call on the GFCM to align with these established standards.

To highlight the need to extend IMO numbers standards in GFCM to include vessels above 12 metres of LOA, we conducted a screening of the GFCM Authorized Vessel List (AVL) to assess how many vessels that are eligible for IMO numbers currently lack them (or where no IMO number is provided in the GFCM AVL). Our analysis reveals significant variation among contracting parties (CPCs), underscoring the pressing need for a GFCM legally binding Recommendation to create a common harmonised framework for IMO number requirements.

This policy briefing provides an overview of the vessels with IMO numbers on the GFCM AVL per country, explores IMO number requirements in other RFMOs, and provides recommendations for the GFCM to strengthen its standards in line with best practice.

¹ International Maritime Organization. (2027). IMO ship identification number scheme. Available at: https://www.cdn.imo.org/localresources/en/OurWork/lllS/Documents/A%2030-Res.1117%20-%20Imo%20Ship%20Identification%20Number%20Scheme.pdf

² International Maritime Organization. (2027). IMO ship identification number scheme. Available at: https://www.cdn.imo.org/localresources/en/

 $[\]underline{\textbf{OurWork/IIIS/Documents/A}\%2030-Res.1117\%20-\%20Imo\%20Ship\%20Identification\%20Number\%20Scheme.pdf}$

 $^{3\,}GFCM.\,(2017).\,Resolution\,GFCM/41/2017/6\,on\,the\,application\,of\,an\,International\,Maritime\,Organization\,number.$

https://gfcm.sharepoint.com/CoC/Decisions%20Texts/Forms/AllItems.aspx?id=%2FCoC%2FDecisions%20

⁴ GFCM. (2021). Resolution GFCM/44/2021/6 on the application of an International Maritime Organization number, amending Resolution GFCM/41/2017/6. 5 IMO (2017). Resolution A.1117 (30).

HOW MANY VESSELS IN THE AVL HAVE IMO NUMBERS?

Of the 8694 vessels listed in the GFCM AVL ⁶ 19% (1627 vessels) have IMO numbers (see Appendix 1). Greece, Tunisia, and Spain have the highest proportion of vessels with IMO numbers relative to their fleet sizes, while Egypt, Türkiye, and Algeria have the lowest proportion of their fishing fleet with IMO numbers. There are significant variations in the number of vessels with IMO numbers among CPCs. It is important to note that the GFCM AVL includes vessels of more than 15 metres LOA; all of which are therefore eligible for a free IMO number.

DOES THE GFCM FOLLOW BEST PRACTICE ON IMO NUMBERS?

Appendix 2 provides the details of IMO number requirements across RFMOs. It clearly shows that the GFCM stands out as an exception in terms of having weaker IMO standards. Among the 13 RFMOs assessed, only three RFMOs (including GFCM) do not mandate IMO numbers for vessels above 12 metres length that fish within their convention areas. Moreover, this weaker IMO standard in GFCM is not legally binding.

RECOMMENDATIONS FOR THE GFCM TO IMPROVE STANDARDS ON IMO NUMBERS

In line with recommendations from the IMO, and with international best practice in IMO standards in RFMOs, we recommend that the GFCM extend its existing requirement for IMO numbers to all eligible fishing vessels over 12 metres LOA, through a binding GFCM Recommendation.

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APPENDIX 1

Vessels with IMO numbers in the GFCM Authorised Vessel List per country

Note that for vessels flagged to a Member State of the EU an IMO number requirement has also been introduced since January 2016, IMO numbers have been required for all EU vessels of more than 24 metres in LOA (or 100 GT and above) fishing in EU waters, and for all EU vessels of more than 15 metres of LOA fishing outside of European waters. This explains that for some Member States not all vessels have IMO numbers, as those vessels supposedly operate only in EU waters, where the requirement is for vessels above 24 meters of LOA.

GFCM COUNTRY	TOTAL NUMBER OF VESSELS IN GFCM AVL	NUMBER OF VESSELS WITH IMO NUMBERS	RANKING ⁷
Albania	185	0	20
Algeria	ria 871		22
Bulgaria	53	0	19
Croatia	292	110	5
Cyprus	23	20	9
Egypt	1631	0	24
France	94	89	6
Georgia	58	57	7
Greece	500	421	1
Israel	10	0	16
Italy	1422	229	4
Lebanon	1	0	13
Libya	479	45	8
Malta	49	0	18
Montenegro	14	1	12
Morocco 223		0	21
Palestine	alestine 28		17
Portugal	1	1	11
Romania	5	3	10
Slovenia	6	0	14
Spain	692	314	3
Tunisia	995	353	2
Türkiye	1050	0	23
Ukraine	9	0	15

⁷ The ranking is first based on the total number of vessels flagged to the country with IMO numbers and second on the fleet size (how many vessels flagged to the country are in the GFCM AVL)

APPENDIX 2

Compilation of IMO number requirements in the RFMOs⁸

RFMO	REQUIREMENT OF IMO NUMBER	FOLLOW 2017 IMO ASSEMBLY RESOLUTION A.1117(30)	LINK
CCAMLR	12 m	YES	Conservation Measure 10-02 (2022)
CCSBT	12 m	YES	Resolution on a CCSBT Record of Vessels of Authorised to Fish for Southern Bluefin Tuna
GFCM	20 m	NO	(non-binding) Resolution GFCM 44/2021/6 on the Application of an International Maritime Organisation number on the application of the International Maritime Organisation number, amending Resolution GFCM/41/2017/6
IATTC	12 m	YES	Resolution (amended) on a regional vessel register
ICCAT	20 m	NO	Recommendation by ICCAT amending recommendation 13-13 concerning the establishment of an ICCAT record of vessels 20 metres in length overall or greater authorised to operate in the convention area
IOTC	12 m	YES	Resolution 19/04 concerning the IOTC record of vessels authorised to operate in the IOTC area of competence
NAFO	12 m	YES	NAFO Conservation and Enforcement Measures 2023
NEAFC	12m	YES	NEAFC Scheme of Control and Enforcement

⁸ Oceana. (2023). Call for the GFCM to increase transparency and effectively tackle non-compliance cases and IUU fishing. https://europe.oceana.org/reports/call-for-the-gfcm-to-increase-transparency-and-effectively-tackle-non-compliance-cases-and-iuu-fishing/

RFM0	REQUIREMENT OF IMO NUMBER	FOLLOW 2017 IMO ASSEMBLY RESOLUTION A.1117(30)	LINK
NPFC	12 m	YES	Conservation and management measure on information requirements for vessel registration
SEAF0	> 100 GT	NO	System of observation, inspection NAFO Conservation and Enforcement Measures 2023, compliance and enforcement 2019
SIOFA	12 m	YES	Conservation and Management Measure for Vessel Authorisation and Notification to Fish (Vessel Authorisation)
SPRFM0	12 m	YES	CMM 05-2022 Conservation and Management Measure for the Establishment of the Commission Record of Vessels Authorised to Fish in the Convention Area
WCPFC	12 m	YES	CMM 2018-06 - Conservation and Management Measure on the Record of Fishing Vessels and Authorisation to Fish







