

Global Fishing Watch's Position Statement for the 29th Regular Meeting of the International Commission for the Conservation of Atlantic Tunas (ICCAT)

Global Fishing Watch is pleased to participate as an observer in the 29th Regular Meeting of the International Commission for the Conservation of Atlantic Tunas (ICCAT) in Seville, Spain. We commend the Secretariat, Chair and Members for their continued efforts to advance sustainable fisheries. Global Fishing Watch works to strengthen ocean governance by increasing transparency of human activity at sea, providing publicly available data and tools that support science, compliance and decision-making. To support ICCAT's mandate and combat illegal, unreported and unregulated (IUU) fishing, we highlight the following opportunities to strengthen fisheries management: improving transparency of fishing vessel operations, making vessel ownership information available and enabling contracting parties (CPCs) to improve access to tracking and ownership information through data-sharing tools.

Vessel tracking

Vessel tracking enables us to better understand what is happening on the ocean by providing information on a given vessel. It allows for the monitoring, control and surveillance (MCS) of fishing activity, both authorized and unauthorized, giving fisheries managers a comprehensive picture and the ability to better target inspections. Vessel tracking also supports wider ocean governance by providing crucial evidence and data to protect sensitive marine habitats and biodiversity, conduct marine spatial planning and enhance the safety of fishers at sea. Given these benefits, transparency in vessel tracking is important for organizations like ICCAT, which has a mandate to ensure the sustainable management of fisheries resources within its jurisdiction. Vessel tracking transparency is vital to ensuring the long-term conservation and sustainable use of fish stocks.

Current vessel tracking requirements in ICCAT

ICCAT requires Vessel Monitoring System (VMS) use under [Recommendation 18-10](#). VMS is required for all vessels over 20 meters between perpendiculars or over 24 meters in length, as well as any vessel over 15 meters authorized to fish beyond national jurisdiction. However, VMS data is only centrally collected for vessels fishing bluefin tuna under [Recommendation 22-08](#). For other species, there is no requirement to submit VMS data and no mechanism to share data between CPCs. The absence of centralized VMS data sharing and inconsistent implementation among members has limited the effectiveness of the system and compliance activities.

The role of Automatic Identification System (AIS)

AIS is a widely available technology that provides continuous tracking of vessels equipped with transponders. It was originally developed as a maritime safety communication protocol to enhance vessel tracking and prevent collisions and it remains an essential tool for protecting lives at sea (1). Over time, its growing use and the expansion of satellite reception have transformed it from an exclusively safety-focused tool into a more widely used system for tracking ocean-going vessels.

Many ICCAT CPCs - including the United States of America (U.S.), the European Union (EU), the United Kingdom (UK), Canada, Panama, the Republic of Korea and China - already mandate AIS under national regulations. For example, the EU's recent revision of its Fisheries Control Regulation (1224/2009) requires Member States to ensure AIS data is made available to competent authorities for control purposes.



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Additionally, some regional fisheries management organisations and arrangements (RFMO/As) such as the Convention on the Conservation of Antarctic Marine Living Resources (CCAMLR) and the Indian Ocean Tuna Commission (IOTC), already have regulations in place that integrate AIS data to strengthen monitoring and enforcement in the fight against IUU fishing. For instance, CCAMLR mandates the use of AIS for certain vessels under Conservation Measure 10-02 (2022) and IOTC includes AIS as a tool for monitoring in Resolution 24/03 (see Annex, points 1 and 2).

More recently, in May 2025, the EU proposed within the Northwest Atlantic Fisheries Organization (NAFO) Standing Committee on International Control (STACTIC) Intersessional Meeting that all vessels over 15 meters operating in the NAFO Regulatory Area be equipped with and maintain continuously operational AIS (2), recognizing its utility for inspection planning, monitoring and control.

Global Fishing Watch internal analysis suggests that **77 percent of ICCAT registered vessels greater than 24 meters and 60 percent of vessels greater than 15 meters are already broadcasting their location on AIS**. This demonstrates that AIS is a valuable tool that can be easily adopted into RFMO frameworks to strengthen monitoring and enforcement.

Benefits of AIS in fisheries management

While compliance with ICCAT Recommendation 18-10 on VMS is key to fisheries management, the consideration of use of **AIS as a complementary tool** is recommended for the following benefits:

1. **Safety** - AIS enhances maritime safety by helping to prevent collisions and aiding in search and rescue operations, which are crucial for the safety of fishers.
2. **Fisheries management** - AIS provides detailed and in most systems real-time data on vessel positions and movements, which can be used to understand fishing effort better and support the assessments of fish stock health and the implementation of sustainable fishing practices. It also supports monitoring and compliance efforts and complements other tracking systems such as VMS.
3. **Industry benefit** - AIS aids in the traceability of fishery products, which is increasingly important for market access and consumer confidence.
4. **Improved transparency of fishing activity** - This data supports better scientific research, helps in marine spatial planning and improves regulatory compliance by providing a transparent and enforceable system to monitor fishing activities.
5. **Cost** - AIS is a cost-effective solution for vessel operators due to lower installation costs compared to VMS. Additionally, it can enable the ICCAT Secretariat and the Standing Committee on Research and Statistics (SCRS) to access and process data more easily and improve research, monitoring and compliance efforts.

Using both systems in conjunction allows to cross-check information, enhance safety and detect unusual behavior more effectively than using either system independently. Global Fishing Watch's analysis shows that inconsistencies can occur in both VMS and AIS datasets, with occasional gaps in coverage for either system. By combining the two sources, a more complete picture of vessel activity emerges, improving safety at sea by ensuring vessels are continuously monitored even when one system experiences gaps. For example, in three anonymized case studies conducted by Global Fishing Watch (see Annex, point 3 example 1, 2 and 3), VMS provided coverage where AIS data were sparse, while AIS captured vessel movements when VMS data were unavailable. **This demonstrates that AIS and VMS complement each other, supporting both operational safety and effective monitoring.**

Key asks

Global Fishing Watch asks the Commission to introduce an AIS requirement by amending recommendation 18-10 to:

- Recognize AIS as a complementary tool to VMS to enhance monitoring, enforcement and safety.
- Require AIS installation for vessels of a size threshold to be determined by CPCs, in line with existing VMS requirements under recommendation 18-10.
- Use AIS as a backup where VMS fails or data are missing, improving coverage and reporting accuracy.
- Promote broader sharing of vessel tracking data to improve fisheries management, compliance and scientific use, while safeguarding sensitive information.
- Adopt recommendations for CPCs on the minimum standards for use of AIS for fishing vessels that in line with IMO Guidelines (3) on correct AIS information, disabling and general operation.



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Ultimate Beneficial Ownership (UBO)

Ultimate beneficial owners of IUU fishing linked vessels often seek to hide their identities in order to escape accountability for their vessels' behavior, allowing them to continue profiting from illegal activity. Research has found that 70 percent of the known vessels implicated in IUU fishing are, or have been, flagged to a tax haven jurisdiction, allowing owners to obscure their identities (4). UBO transparency enables authorities to sanction owners of IUU vessels and track them even when they operate through new vessels, companies or flags to inform risk-based assessments.

As IUU fishing is transboundary, UBO information can enable ICCAT and CPCs to identify patterns of misconduct linked to specific UBOs operating across jurisdictions. Several other RFMO/As, including IOTC and CCAMLR, also require UBO data to be reported (see Annex, points 4 and 5).

Key asks

Global Fishing Watch, Pew and Oceana submitted an [observer paper](#) to the 18th Meeting of the Working Group on integrated monitoring measures on beneficial ownership transparency, why it matters and options that CPCs could consider to address it. The recommendations include:

- **Reporting Requirements:** To strengthen the ICCAT Record of Vessels, CPCs should adopt a Recommendation to collect and report UBO information as part of vessel authorization procedures. ICCAT Recommendation 21-13 requires sharing the name and address of beneficial owners on the IUU list.
- **Strengthening Enforcement Capabilities:** ICCAT could integrate UBO data into its compliance and enforcement framework to support vessel analysis and investigations, particularly in cases involving vessels linked to owners sanctioned by other RFMOs.
- **Data Accessibility and Intergovernmental Sharing:** CPCs could share UBO data through the FAO Global Record of Fishing Vessels. ICCAT might consider facilitating intergovernmental data-sharing arrangements among CPCs, considering data privacy and confidentiality concerns.



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Vessel Information Sharing Tool (VIST)

Timely and up-to-date information exchange in databases like the ICCAT Record of Vessels is essential to prevent, deter and eliminate IUU fishing and enable effective fisheries governance. However, many countries face limited resources and capacity to maintain, update and share vessel databases, which can sometimes lead to outdated or incomplete information.

Global Fishing Watch is developing a tool to streamline procedures for sharing vessel data (including tracking and ownership) in an automated manner to regional databases including those of RFMOs and global databases such as the FAO Global Record of Vessels. The **Vessel Information Sharing Tool (VIST)** is aimed at pulling data from national registries, aggregating it and automatically filling in vessel registry forms for different databases, according to the user's needs. The tool will also detect and show where data is missing from specific fields, so users are able to complete them.

Subsequent to the Recommendation by ICCAT to continue the development of an integrated online reporting system ([Rec. 21-20](#)), Global Fishing Watch has closely followed the progress made by the Online Reporting Technology Working Group (WG-ORT) and the Secretariat to develop the Integrated Online Management System (IOMS) and has observed the utility of the system to enhance compliance with ICCAT reporting requirements.

Similar to IOMS, the VIST aims to reduce the burden associated with ICCAT reporting requirements for CPCs and increase access to vessel information, thus strengthening transparency within the organization. By supporting CPCs on the collection, collation and harmonization of data, the tool will facilitate the further process of inputting vessel information into IOMS specific modules, with enhanced completeness of fields and quality of data.

Key asks

Global Fishing Watch will continue to liaise with the ICCAT Secretariat and the WG-ORT to coordinate actions in support of IOMS and in favor of complete reporting requirements with a reduced burden on CPCs, while developing data sharing solutions. Global Fishing Watch encourages the commission to:

- Continue coordinated efforts to complete tasks envisioned for completion during phase 4 of the IOMS development.
- Support the release of the vessel manager and form manager modules and maintain support to CPCs on use of the system.
- Share any identified needs and concerns with regards to vessel data management and sharing, in order to identify possible solutions and recommendations.

References

1. Mandated by the International Maritime Organization (IMO) in 2002 under Regulation 19 of Chapter V of the International Convention for the Safety of Life at Sea (SOLAS).
2. See point 9 of the NAFO STACTIC Intersessional Meeting report:
<https://www.nafo.int/Portals/0/PDFs/COM/2025/comdoc25-03.pdf>
3. Resolution A.1106(29), Revised Guidelines For The Onboard Operational Use Of Shipborne Automatic Identification Systems (Ais)
4. Galaz, V., Crona, B., Dauriach, A. et al. Tax havens and global environmental degradation. Nat Ecol Evol 2, 1352–1357 (2018). <https://doi.org/10.1038/s41559-018-0497-3>

Annex

1. CCAMLR Conservation Measure 10-02 (2022), paragraph 2(vii):

- “A Contracting Party may only issue such a licence to fish in the Convention Area to a vessel flying its flag, if the vessel has an IMO number and if the Contracting Party is satisfied of the vessel’s ability to exercise its responsibilities under the Convention and its conservation measures, by requiring from the vessel, inter alia, the following:
 - (vii) from the 2023/24 fishing season, being **fitted with a fully functional Automatic Identification System (AIS) and keep it switched on at all times when in the Convention Area** for the prevention of collision between vessels, except for when the operation of AIS might compromise the safety or security of the vessel or where security incidents are imminent.”

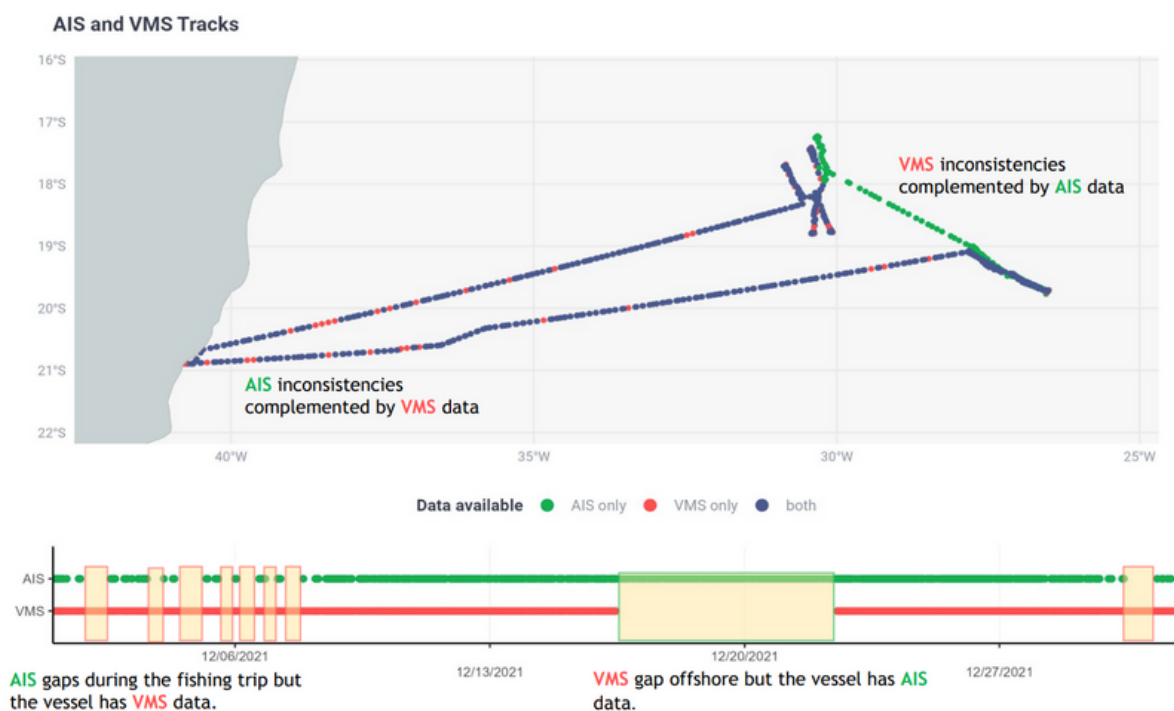
2. IOTC Resolution 24/03 on the Establishment of a List of Vessels Presumed to Have Carried Out Illegal, Unreported, and Unregulated Fishing in the IOTC Area of Competence, paragraph 6(c)(ii):

- “any other information obtained from other sources and/or gathered from the fishing grounds such as ii. information from coastal States including VMS transponder or **AIS data**, surveillance data from satellites or airborne or seaborne assets.”

3. Complementary use of AIS and VMS

Three anonymized examples of vessels tracked using both AIS and VMS within the ICCAT Convention area. Periods of missing data in one system are complemented by the other, illustrating how the two systems together provide a more complete understanding of vessel activity and enhance safety at sea.

Example 1



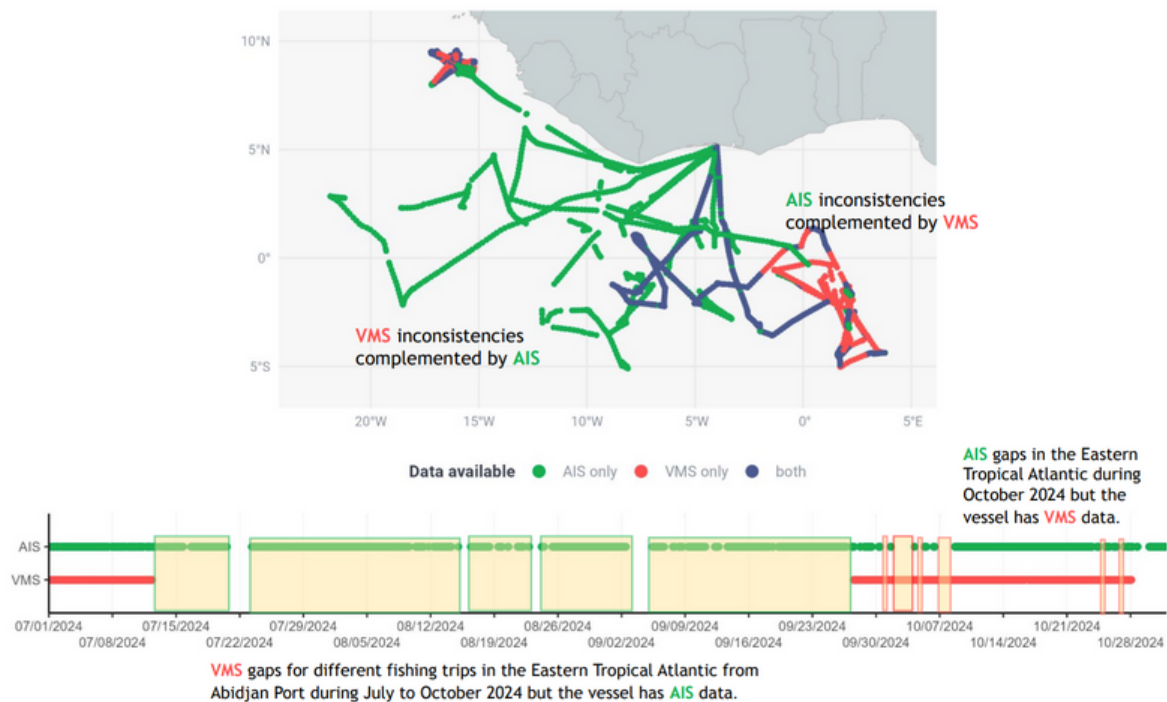
Example 2

AIS and VMS Tracks



Example 3

AIS and VMS Tracks



4. IOTC Resolution 19/04 Concerning the IOTC Record of Vessels Authorised to Operate in the IOTC Area of Competence, paragraph 3:

- ***“Each Contracting Party and Cooperating Non-Contracting Party (hereinafter referred to as “CPC”) shall submit electronically, to the IOTC Executive Secretary for those vessels referred to 1(a) and for those vessels referred to 1(b), the list of its AFVs that are authorised to operate in the IOTC area of competence. This list shall include the following information:***
 - ***1) Name and address of beneficial owner(s), if known and different from vessel owner/operator or indicate non-availability;”***

5. CCAMLR Conservation Measure 10-02 (2022). Licensing and inspection obligations of Contracting Parties with regard to their flag vessels operating in the Convention Area, paragraph 3:

- ***“Each Contracting Party shall provide to the Secretariat within seven days of the issuance of each licence and prior to the vessel fishing in the Convention Area, or when notifying the Secretariat of a replacement fishing vessel under Conservation Measure 21-02, paragraph 11 or Conservation Measure 21-03, paragraph 7, the following information about licences issued:***
 - ***(vi) name and address of vessel’s owner(s), and any beneficial owner(s) if known;”***

For more information

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Global Fishing Watch is an international nonprofit organization dedicated to advancing ocean governance through increased transparency of human activity at sea. By creating and publicly sharing map visualizations, data and analysis tools, we aim to enable scientific research and transform the way our ocean is managed. We believe human activity at sea should be public knowledge in order to safeguard the global ocean for the common good of all.



Global Fishing Watch