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The Pew Charitable Trusts'
Statement to the Permanent Working Group of the 21st Special Meeting of ICCAT
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Pew encourages the Permanent Working Group (PWG) to agree upon concrete actions at this year's Commission meeting to increase transparency in the activities of all ICCAT Parties, strengthen port State measures, improve vessel monitoring systems and implement strong vessel identification rules.

We would like to highlight the importance of the proposals from IMM to (1) bring ICCAT's Port State Measures into line with the FAO Port State Measures Agreement and (2) strengthen VMS requirements including reduction of polling time and strengthening the anti-tampering provisions embodied in the proposal from IMM. Additionally, we encourage CPCs to consider expanding VMS requirements to all fisheries managed under ICCAT's jurisdiction. We also encourage Parties to take action to require IMO numbers on all vessels fishing in ICCAT fisheries who are eligible for IMO numbers under the broadened eligibility criteria that were issued by IHSM in December 2017.

Also, this year, we encourage the PWG to review and strengthen ICCAT's regulation of transshipment. A brief analysis (available for review in document COC-320) of the publicly available information on transshipment operations occurring within ICCAT fisheries highlighted the following key issues and presented several recommendations for consideration:

1. Transshipment events are increasing on the high seas: The number of reported high seas transshipment events have increased by 28 percent over a recent four-year period - from 403 reported events between September 2012 and August 2013 to 519 reported events between September 2016 and August 2017. The quantities of fish and fish products transshipped as reported by CPCs have also increased by 57 percent over the four-year period between calendar year 2012 (31,923.8 tons) and calendar year 2016 (50,163 tons). *As high seas transshipment events continue to increase, proper vessel monitoring is essential to prevent illegally caught and transshipped catch from entering the seafood supply chain.*
2. Insufficient Monitoring of Transshipment Activities and Compliance with Regulations: The 2017 Compliance Summary report highlights potential illegal activities related to transshipments and the lack of required reporting by some CPCs. *CPCs should commit to holding discussions regarding transshipment compliance issues annually in the Compliance Committee meeting*
3. Significant Discrepancies in Transshipment Reporting Between the ROP and CPCs: ICCAT reports for 2016-17 reveal significant discrepancies in the number and tonnage of high seas transshipment events reported by flag CPCs and the high seas transshipment events reported by ROP observers. *To allow the Secretariat to have a clear overall picture of all transshipping events occurring within the Convention Area, all transshipment events should be reported by both carrier vessels and LSVLPs to the relevant flag State, coastal State, and/or port State, including the ICCAT Secretariat, regardless of the transshipment event location or origin of catch being transshipped.*
4. Standardized Data Submission Forms Are Needed to Effectively Report Transshipment Operations Consistently Between CPCs: The report on the implementation of the ROP provides a summary of transshipment events is at least two years old. Additionally, transshipment reports from past years tend to cover different time periods, making it especially difficult to effectively compare reports and review compliance. *ICCAT should develop a template that includes data fields clearly outlining the*

number of offloading and receiving vessels involved in transshipping per calendar year in the Convention Area as well as the number and quantities of fish transshipped for each event by location.

5. Loopholes in Recommendation 16-15 Reduce the Effectiveness of Monitoring and Tracking of Transshipped Products Sourced from ICCAT Waters: The current language of Recommendation 16-15 leaves a critical loophole that could allow illegally caught fish to be transshipped and then landed in ports of non-CPCs without documentation. Additionally, the Recommendation does not include any requirements for observers to record transshipments occurring in port and as of 13 October 2017, only 11 CPCs (out of the 56 ICCAT CPCs) had submitted to ICCAT an in-port transshipment report for 2016. Note that 41 countries reported no in-port transshipments had taken place in 2016 and that “...other reports indicate possible transshipment activity in port...” for those same 41 countries. Additionally, the reports do not clearly illustrate any transshipment data collected from neighboring RFMOs. *Recommendation 16-15 language should be revised to require:*
 - a. *Transshipped products sourced from ICCAT waters but landed outside the Convention Area be accompanied by transshipment declarations until the first point of sale.*
 - b. *All transshipment authorizations and declarations be sent to all relevant authorities in near-real time.*
 - c. *100 percent of all in-port transshipments must be observed, and all transshipment reports and declarations be sent to the Secretariat, to include ‘nil’ reports if no transshipments occurred.*
 - d. *To ensure sharing of data by relevant authorities, ICCAT should establish and harmonize transshipping data-sharing procedures among relevant flag State, coastal State, port State authorities, and RFMO Secretariats.*

In addition to this review, Pew conducted a preliminary analysis of commercially available historical Automatic Identification System (AIS) data. The data suggests that 22 of the 24 non-CPC flagged carrier vessels on the ICCAT authorized carrier vessel list were active in the Convention Area in 2016. These 22 carriers conducted many port calls in multiple west African CPCs. Recommendation 16-15 currently does not require non-CPCs to submit transshipment reports on the activities of their flagged vessels, as is required for CPC-flagged vessels. Additionally, there are no other ICCAT reports which provide data on the activities of non-CPC authorized carrier vessels nor have either of the two non-CPCs, the Bahamas and Singapore, provided their own information on the activities of these carrier vessels. Only two of the nine CPCs where non-CPC carrier vessels made port calls reported in-port transshipments. This management loophole may allow catch sourced from ICCAT waters to go unreported and enter the seafood supply chain within the holds of carrier vessels flagged to countries that are not even members of ICCAT.

The current data and trends on transshipment clearly illustrate the need for additional ICCAT management regulations on transshipment and transshipment reporting. Pew urges the PWG to consider the specific recommendations within document COC-320 in order to secure more effective management of transshipments occurring within its waters. We strongly urge ICCAT CPCs to revise its measures to fill these serious gaps.

Finally, in our capacity as the Chair of the Global Ghost Gear Initiative’s Working Group to Define Best Practice and Inform Policy, Pew acknowledges and supports the proposal submitted by Norway (PWG-13) to address lost, abandoned, or otherwise discarded fishing gear in the ICCAT Convention Area. Many of the points included in the proposal align with the best practices identified by our working group and adopted by the Global Ghost Gear Initiative, after extensive stakeholder consultation, and its nearly 100 member organizations. The proposal is also consistent with this year’s COFI action to advance efforts to reduce the impacts of abandoned, lost, or otherwise discarded fishing gear. We urge PWG members to support this draft.