

A Review of Management and Reporting Trends Related to Transshipment Occurring within the ICCAT Convention Area

With the next Commission meeting for The International Commission for the Conservation of Atlantic Tunas (ICCAT) scheduled for November, this paper provides a brief outline and analysis of the publicly available information on transshipment operations within the ICCAT Convention Area and is meant to stimulate discussion regarding how transshipment is managed and reported by ICCAT. Outlined are six key findings and recommendations.

ICCAT adopted its current measure on transshipment, Recommendation 16-15, in 2016. The recommendation notes that *“...organized tuna laundering operations have been conducted and a significant amount of catches by IUU fishing vessels have been transshipped under the names of duly licensed fishing vessels...”*. In addition, data from the most recent ICCAT Secretariat Biennial Report indicates that the number of reported high seas transshipments increased between 2012 and 2017 (the most recent year for which data is available). The information in the Secretariat’s report, coupled with the discrepancies and non-compliance documented within ICCAT reports, raise concerns about whether ICCAT is effectively regulating and reporting transshipment.

Moreover, information regarding transshipment in the ICCAT Convention Area is spread out amongst multiple reports, and inconsistencies exist between ICCAT reporting sources, making overall robust analyses of the data extremely challenging.

This initial analysis illustrates the need for better regulation and reporting of ICCAT transshipment activities to ensure full and effective monitoring and reduce opportunities for illegal fishing and the introduction of illegally caught fish into the seafood supply chain. The Pew Charitable Trusts urges ICCAT to consider the recommendations included in this paper -- and summarized on page 15 -- to secure more effective management of transshipment within ICCATs waters.

Key Finding	Recommendation
<p>1. There is an increasing number of at-sea transshipment events occurring within the ICCAT Convention Area.</p>	<p>ICCAT should update the current transshipment Recommendation 16-15 to ensure that all transshipments occurring within the Convention Area are reported to all relevant authorities (flag, coastal, and port State authorities, and the RFMO Secretariat) in near-real time.</p>
<p>2. Monitoring of transshipment activities is inadequate and compliance with ICCAT regulations is insufficient.</p>	<p>ICCAT should evaluate how the current transshipment resolution is implemented and ICCAT should only allow vessels flagged to Contracting Parties or Cooperating Non-Contracting Parties, Entity, or Fishing Entities (CPCs) to be included in the list of carrier vessels authorized to transship in ICCAT waters.</p>
<p>3. Significant discrepancies in reporting exist between the ICCAT Regional Observer Program (ROP) and CPCs.</p>	<p>ICCAT should collect, review, and reconcile all transshipment data to address any potential inconsistencies that may be due to misreporting.</p>
<p>4. Non-standardized data submission forms lead to inconsistency in reported transshipment operations between CPCs.</p>	<p>ICCAT should develop a reporting template that includes data fields clearly outlining the number of offloading and receiving vessels involved in transshipment in the Convention Area as well as the number of events and quantities of fish transhipped for each event by location.</p>
<p>5. Discrepancies exist between carrier vessel activity reported by ICCAT and what was identified through AIS analysis.</p>	<p>ICCAT should consider using AIS data to supplement existing information in order to gain a better understanding of carrier vessel movements within the Convention Area.</p>
<p>6. Potential loopholes exist in the current Recommendation 16-15 on transshipment.</p>	<p>Key updates to Recommendation 16-15 should include clarifying transshipment report recipients and data sharing among RFMOs. Further recommendations are detailed in the last section of the paper.</p>

1. There is an increasing number of at-sea transshipment events occurring within the ICCAT Convention Area

The number of reported high seas transshipment events has increased by 44 percent over the most recent four-year period for which data is publicly available -- from 403¹ reported events between September 2012 and August 2013 to 584² reported events between September 2017 and August 2018. During that same timeframe, the Regional Observer Program (ROP) reported that there was a 61 percent increase in observer days at sea, from 727 days to 1,176 days at sea and a 17 percent increase in tons of fish transshipped.

Bigeye tuna, a species currently overfished and experiencing overfishing³, accounted for more than 67 percent (19,544.83t) of the fish transshipped in 2017.⁴ Bigeye tuna caught by longline vessels are often used for fresh or frozen sashimi and therefore command higher prices per metric ton. In 2014, bigeye tuna had a global end value - the total amount paid by the final consumer – of \$5.17 billion USD.⁵ While transshipment of this species maintains freshness to obtain high market prices, the practice can also create economic incentives for misreporting as another means to increase profits.

Recommendation: Recognizing the relatively high value of tuna transshipped and the increasing trend of high seas transshipments of severely depleted stocks occurring within its Convention Area, ICCAT should update the current Recommendation to increase monitoring and allow authorities to better track and audit data on transshipped catch.

2. Monitoring of transshipment activities is inadequate and compliance with regulations is insufficient

A. Transshipments by non-CPC vessels

As of 26 June 2019, there were 141 carrier vessels listed on the ICCAT Authorized Carrier Vessels list (Table 1)⁶. Of these, 25 carrier vessels were flagged to non-CPCs, accounting for more than 17 percent of the carriers listed. Recommendation 16-15 currently provides no explicit requirement for non-CPCs to submit transshipment reports on the activities of their flagged carrier vessels, as is required of CPCs. ICCAT has limited ability to hold non-CPCs accountable for non-compliance by their flagged vessels and there is very little transparency or reporting on transshipment events conducted by non-CPC flagged

carrier vessels in the ICCAT Convention Area. ICCAT reports documenting 2016 and 2017 transshipment activities of carrier vessels also appear to provide no information relevant to the carrier vessels flagged to two non-CPCs which could be used to verify the activities of these vessels.

Table 1: Number of Carrier Vessels by Flag Country⁶

Flag Country	Panama	Liberia	EU	Korea	Chinese Taipei	Curacao	Japan	Ghana	Belize	Non-CPCs	Bahamas	Singapore	Total
# carrier vessels	60	26	4	8	5	5	5	2	1		24	1	141

Recommendation: To ensure proper oversight of all transshipments occurring in the ICCAT Convention Area, only carrier vessels flagged to CPCs should be authorized to transship in ICCAT waters.

B. Non-compliance with VMS requirements

Recommendation 16-15 requires that carrier vessels operate Vessel Monitoring Systems (VMS) to transship in the Convention Area.⁷ Yet, nine of the vessels on the ICCAT list of active carrier vessels do not list having an installed VMS onboard (Table 2). The lack of VMS onboard hinders fisheries managers' ability to track vessel activities. Additionally, the ICCAT 2018 IUU vessel list includes two vessels, Bigeye and Maria, which did not have VMS on board. Both vessels were suspected of having no tuna license, and possibly transhipped at-sea.⁸ This is a clear example of how vessels not using VMS can be linked to other suspicious activity.

Recommendation: Upon entering the Convention Area, carrier vessels should be required to notify the ICCAT Secretariat of their intent to transship and confirm that an assigned ICCAT observer is on board and that their VMS is operational.

Table 2: Authorized Carrier Vessels without VMS listed⁶

ICCAT Serial Number (AT000)	CUW00006	CUW00007	CUW00014	CUW00009	PAN00244	PAN00229	PAN00214	PAN00241	PAN00172
Flag CPC	Curacao	Curacao	Curacao	Curacao	Panama	Panama	Panama	Panama	Panama

C. CPC noncompliance with transshipment reporting requirements

The 2017 Compliance summary tables (COC – 308C) noted that the Commission was uncertain of one CPC’s “...ability to effectively control its carrier vessels to ensure respect of ICCAT requirements, including ability to impose sanctions for violations of ICCAT requirements that are adequate in severity to be effective in securing compliance and to discourage violations wherever they occur...”. A review of the 2017 Compliance Summary tables (Table 3) highlights that some CPCs submit their transshipment reports late or incomplete, while others did not submit their transshipment reports at all.⁹

Table 3: Summary of Transshipment Compliance for 2017/18⁹

CPC	Potential Issues of Non-Compliance
Panama (pg. 35)	No in-port transshipment reports submitted
Vanuatu (pg. 50)	2015 carrier vessels transshipment report not submitted
Chinese Taipei (pg. 53)	Incomplete list of fishing vessels authorized to transship was submitted
St. Vincent and the Grenadines (pg. 42)	Transshipment report submitted late
Liberia (pg. 26)	Transshipment report submitted late

Recommendation: The ICCAT Compliance Committee should regularly evaluate each CPC’s ability to effectively monitor and control its own flagged carrier vessels and comply with transshipment reporting requirements.

D. Non-action on reported compliance issues

Specific compliance issues involving transshipment have been reported by CPCs with no apparent follow-up action considered by ICCAT. In June 2016, Senegal notified the ICCAT Secretariat that 11 Chinese Taipei-flagged fishing vessels allegedly conducted unauthorized transshipment with the Liberian-flagged carrier vessel “New Bai I No. 168” in the ICCAT Convention Area.⁹ The COC – 308C report also included an EU account of Tunisian vessels, not included in the ICCAT record of vessels, transshipping substantial quantities of bluefin tuna at sea, which is banned by ICCAT Recommendation 14-04. Despite these very specific issues, the report of the meeting of the Permanent Working Group (PWG) indicated that these potential transshipment non-compliance issues reported by CPCs were not discussed due to lack of time. It appears very little investigation or discussion on these potential cases of illegal activity have been considered by either the Secretariat or the relevant CPCs.

Recommendation: CPCs should commit to holding discussions regarding reported transshipment issues during the annual ICCAT Compliance Committee and PWG meetings and consider developing penalties

for serious and/or persistent non-compliance.

3. Significant discrepancies in reporting between the ICCAT Regional Observer Program (ROP) and Cooperating Non-Contracting Parties, Entity, or Fishing Entity (CPCs)

A. Number of transshipments, vessels and total tonnage transshipped in 2016

ICCAT Recommendation 16-15 states that “...Each CPC shall ensure that all carrier vessels transshipping at sea have on board an ICCAT observer in accordance with the ICCAT regional observer program...”.

Hence, it is reasonable to expect that every high-sea transshipment event is recorded by an authorized ROP observer. As such, data on high seas transshipment submitted by CPCs and ICCAT observers should be consistent with one another. However, the ICCAT reports for 2016-17 revealed significant discrepancies in the number and tonnage of high seas transshipment events reported by flag CPCs¹⁰ and the high seas transshipment events reported by ROP observers.¹¹ Table 4 provides examples of these discrepancies. The report on the implementation of the ROP states that 854 high seas transshipment events occurred in calendar year 2016 by 247 large-scale pelagic longline vessels (LSPLVs), yet CPCs reported only 387 high seas transshipment events, with only 160 vessels conducting high seas transshipments in calendar year 2016. The CPC reports do not clearly delineate between carrier vessel or LVSLP transshipments.¹⁰ As such, in analyzing the data provided, it was assumed that each line item in the reporting table referred to one specific transshipment event. While the ROP report¹¹ does note that “Some discrepancies in breakdowns and/or totals exist between the CPC annual transshipment reports and the data base provided by the Consortium”, analysis of the reported quantities transshipped revealed a difference of over 20,000 tons (Table 4). This is a significant discrepancy that requires further inquiry and clarification of data reported.

Table 4: Summary of 2016 Transshipment Data Reported by CPCs and ROP in the Secretariat’s Report

Country	2016 At-Sea Transshipments					
	Reported by CPCs ¹⁰			Report on the implementation of the ROP ¹¹		
	Quantities transshipped (t)	Transshipments events	Vessels that transshipped	Quantities transshipped (t)	Transshipments events	Vessels that transshipped
Belize	646	14	2	554	12	2

China	4764	132	32	6088	177	97
Chinese Taipei	14047	52	52	12811	384	58
Cote d'Ivoire	300	2	2	452	10	2
Japan	10783	60	60	9729	238	72
Senegal	184	3	1	52	3	1
Korea	1247	55	6	998	19	12
Liberia	18191	69	5	N/A	N/A	N/A
St. Vincent and Grenadines	N/A	N/A	N/A	374	11	3
Total	50,163	387	160	30,159	854	247

Recommendation: These discrepancies clearly demonstrate the need for additional oversight and verification of transshipment related information. ICCAT should collect, review, and reconcile all transshipment data to address any potential inconsistencies.

B. Carrier Vessel trip reports

There was one example found of a carrier vessel trip that was recorded in the summary of deployments in the report on the implementation of the ROP¹¹ but absent from the summary of the ROP.¹² A trip report for 1,613.21 tons was received on March 8, 2017 for a trip that ended in February 27, 2017 after 59 days at sea. Given that the annual contractors report summary of deployments covers the period of September 2016 to August 2017, it is unclear why this carrier vessel trip was not recorded in the annual contractor's report. The summary of deployments between reports also show inconsistencies in other carrier vessel trip details such as dates and ports of observer boarding and disembarking. In addition, the Summary of the ROP indicates that 519 transshipments were observed, however only 517 were recorded in the summary of deployments.¹² There were also notable differences in the trip reports provided by observers deployed on carrier vessels¹³ and data reported by CPCs¹⁰, however a full evaluation of this data was beyond the scope of this brief.

Recommendation: ICCAT should work closely with the ROP to verify carrier vessel trip details and ensure that all transshipments are correctly reported.

C. Transshipment of bluefin tuna

Bluefin tuna caught by longlines are usually transshipped to expedite market delivery, retain freshness, and command higher prices -The catch of Atlantic bluefin tuna is worth nearly US\$1 billion per year.⁵ Illegal and unreported transshipments could undermine even the most precautionary management approach and jeopardize the sustainability of the fishery. To that end, ICCAT has implemented specific control measures for transshipment of bluefin, yet, it is unclear how or if these measures are being implemented.

At-sea

ICCAT Recommendation 14-04 (replaced by Rec. 18-02) notes that *“Transshipment at sea operations of bluefin tuna in the eastern Atlantic and Mediterranean Sea shall be prohibited”*.¹⁴ Recommendation 14-05 (replaced by Rec. 17-06) also notes that *“Transshipment at-sea shall be prohibited”* for Western Atlantic bluefin tuna.¹⁵ However, CPCs reports¹⁰ show that a total of 2,375.5 tons of bluefin tuna were transshipped at sea in 2016 -- of which only 1,199 tons were specified as southern bluefin tuna.

In port

Recommendation 14-04 also states that *“Fishing vessels shall only transship bluefin tuna catches in designated ports of CPCs. To this end, each CPC shall designate ports in which transshipping of bluefin tuna is authorized and communicate a list of these ports to the ICCAT Secretariat by 1 March each year.”* A CPC did not submit a list of designated ports, yet the 2016 in port transshipment records¹⁰ show that it transshipped bluefin tuna in port. At last year’s Commission meeting *“all CPCs agreed that absence of a designated port list means landing or transshipment of BFT is not permitted under ICCAT rules.”* The same CPC *“indicated that it has not submitted a list of designated ports. In the case a vessel lands in one of its ports, the CPC would report that port as designated.”*¹⁶

Recommendations: ICCAT should implement clear transshipment rules for bluefin tuna in Recommendation 16-15. ICCAT should also address vessels violating at-sea transshipment prohibitions of bluefin tuna. Additionally, CPCs who do not provide a list of authorized ports for bluefin tuna landing and/or transshipment should not be allowed to transship this species in port.

D. Annual reports of Contracting Parties

The ICCAT Report for the Biennial Period 2016-17 notes that in 2016 *“two events of transshipment were reported”* for a CPC.¹⁷ However, no details on transshipments conducted by said CPC are included in any transshipment reports prepared by ICCAT or the ROP. The report goes on to note that another CPC had not submitted transshipment reports for 2016. Finally, a third CPC stated that it authorized 52 vessels to

transshipment at-sea in 2016, yet the report on the implementation of the ROP¹¹ states that 58 LSPLVs flagged to this CPC conducted transshipments during that period. It is unclear how these additional six vessels were able to transship at sea if they were not authorized by their CPC.

Recommendation: ICCAT should carefully evaluate each CPC's annual report to identify areas where misreporting may have occurred. It is critical that data collected is then used to verify reports and improve overall monitoring of transshipment activities.

E. CPC reports assessing the content and conclusion of observer reports

In 2017, only five out of the eight countries that participated in the transshipment ROP in 2016 submitted annual transshipment reports required by Recommendation 16-15. Of the five, only two CPCs included their total number of high seas transshipments¹⁸ - the first CPC stated their vessels conducted only 128 high seas transshipment events in 2016, while the ROP reported 238¹¹ at-sea transshipment events for that CPC over the same period. Likewise, the second CPC reported 251 high seas transshipment events in 2016, while the ROP reported 384 high seas transshipments for that CPC.

Similarly, in 2018, only seven of the nine countries that participated in the transshipment ROP in 2017 submitted their annual transshipment reports. Of those seven, two countries did not include all of the required information and only four CPCs reported their total number of high seas transshipments. There were slight differences in numbers of transshipments and LSPLVs reported by two CPCs. Only Senegal, St. Vincent and the Grenadines, Chinese Taipei, and Liberia provided detailed responses when assessing contents of the observer reports.¹⁹

Recommendation: To enable 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, coastal, and port State authorities and the ICCAT Secretariat, regardless of the transshipment event location or origin of catch being transshipped. These reports should clearly delineate between CPC carrier vessel and LSVLP reporting and the Secretariat should consistently verify CPC and observer report data to adequately address significant reporting inconsistencies.

4. Non-standardized data submission forms lead to inconsistency in reported transshipment operations between CPCs

The 2018 Secretariat's report to the PWG on the ROP includes multiple transshipment reports covering various time periods. For instance, the summary of the ROP during 2017 covers ICCAT deployments between September 2016 and August 2017, while the Report on the Implementation of the ROP 2016/2017 shows calendar year 2016 transshipment data and deployments from October 2016-October 2017. These reporting periods make it especially difficult to effectively review compliance with regulations and reporting obligations. The reports also provide very limited information regarding carrier vessels that transshipped in the Convention Area during that period.

The Annual Reports submitted by each CPC varies in specificity regarding transshipment related information.²⁰ Under the column "Transshipment declarations (at sea)" some CPCs provide a date, some provide the total number of transshipment declarations submitted, while others simply responded "yes" or "ditto". There are also no distinct cross-references made for each transshipment declaration and the total number of transshipments reported. Differing reporting periods for information provided by CPC's, the Consortium managing the ROP, and the Secretariat also make it especially difficult to cross-reference the data provided in these reports. A clear template documenting the key information required would help improve the standardization and effectiveness of these reports.

Recommendation: ICCAT should develop a template that includes data fields clearly outlining the number of offloading and receiving vessels involved in transshipping in the Convention Area as well as the number and quantities of fish transshipped for each event by location. To verify the information received by the Secretariat, this template should also include a column to document the number and date of transshipment declarations submitted. To enable cross verification of all these reports, each CPC and the ROP Consortium should report all transshipment data and information summaries by calendar year. A draft template is provided below for consideration by ICCAT.

Transshipment information to be provided annually to ICCAT by CPCs

As required by paragraph 22 of Recommendation 16-15: The flag CPCs of LSPLVs which have transshipped during the previous year and the flag CPCs of carrier vessels accepting transshipments shall submit annually before 15 September to the Executive Secretary the following reports. These reports

shall be made available to the Commission and relevant subsidiary bodies for review and consideration. The Secretariat shall publicly post these reports to the ICCAT website.

Submission Date: 9/10/2020

A. Transshipments Events by Species and Location for Calendar Year 2019

Species	Received or offloaded	Quantities transshipped in Port in metric tonnes (t)	Quantities transshipped within EEZs	Quantities transshipped at the High seas
BET	Offloaded	5,123	0	4,321

B. List of Vessels that Transshipped Within the Calendar Year 2019

Vessel Name and IMO number	Received or offloaded	Number of transshipments	Total quantities transshipped in metric tonnes (t)	Number of transshipment declarations submitted to ICCAT
Tuna Jack/ 987654	Received	184	11,325	184

5. Discrepancies exist between carrier vessel activity reported by ICCAT and what was identified through AIS analysis

Large carrier vessels such as those involved in transshipments are mandated by the International Maritime Organization (IMO) to carry and use AIS transponders. Based on analysis of AIS data by Global Fishing Watch and The Pew Charitable Trusts [\(link\)](#), 77 more carrier vessels were active in the ICCAT Convention Area than were reported by the ROP. These carrier vessels displayed activities consistent with transshipments, but it does not appear that observers were on board, hence there is no reporting on these carrier vessels activities. This study also highlighted many port visits made by non-CPC flagged

carrier vessels to CPC port States. Since CPCs are not required to report non-CPC flagged vessels transshipping within ports, it is unknown what in-port activity was conducted by these non-CPC flagged carrier vessels, though it is certainly possible that they were engaged in in-port transshipments of ICCAT-managed catch.

Recommendation: AIS has a critical role to play in verifying transshipments and carrier trips within the ICCAT Convention Area. ICCAT should consider using AIS data to supplement existing information in order to gain a better understanding of carrier vessel movements within the Convention Area.

6. Potential Loopholes Exist in Recommendation 16-15

- Paragraph 8 states that: “...In order for its carrier vessels to be included on the ICCAT Record List of Carrier Vessels, a flag CPC or flag non-Contracting Party (NCP) shall submit each calendar year, electronically, and in the format specified by the ICCAT Executive Secretary, a list of the carrier vessels that are authorized to receive transshipments in the Convention Area...”. The

Recommendation does not include any requirements for these non-CPCs to report on the transshipment activities of their carrier vessels. This is a critical loophole that creates opportunities for illicit activities, such as misreporting or non-reporting of catches.

Recommendation: Until clear and consistent monitoring schemes are put in place, Recommendation 16-15 should be updated to exclude non-CPC flagged carrier from the ICCAT authorized carrier vessel list. Only CPC flagged vessel should be allowed to transship within the Convention Area.

- The current transshipment reporting obligations enable LSPLVs to delay transmission of the ICCAT transshipment declaration to its flag State by up to 15 days. Considering that the transshipment declaration form only requires basic information observed during the transshipment event, it is unclear why there is an extended period for submission.

Recommendation: Declarations should be required to be transmitted to all relevant authorities within 24 hours of completing the transshipment. This will limit any opportunity to alter recorded information and allow for prompt verification of data.

- Paragraph 18 of the recommendation and paragraph of 4.1 of Appendix 3 notes that transshipment declarations must be sent to “*competent authorities*,” but these authorities are not clearly defined.

Recommendation: To avoid incorrect interpretations, ICCAT should clarify who the “competent

authorities” are. The competent authorities should include flag, coastal, and port State authorities, and the ICCAT Secretariat.

- Paragraph 23 states that transshipments landed in or **imported into the area or territory of CPCs** shall be accompanied by the transshipment declaration until the first point of sale. This leaves a critical loophole where illegally caught fish can be transshipped and then landed in ports of non-CPCs without documentation, thereby creating the opportunity to launder catches sourced from the ICCAT Convention Area.

Recommendation: This language should be revised to require that transshipped products sourced from ICCAT waters but landed outside the Convention Area be accompanied by transshipment declarations until the first point of sale.

- The Recommendation does not include any requirement for observers to record transshipments occurring in port and does not require that the Secretariat receive in-port transshipment notifications or reports. The Secretariat is only privy to in-port transshipment information provided annually and even then, Recommendation 16-15 does not include any specific reporting detail requirements.

As of 12 October 2018, only 12 CPCs (out of the 57 ICCAT CPCs) had submitted to ICCAT an in-port transshipment report for 2017. A different 12 CPCs did not submit a report, and the Secretariat does not know whether or not the CPC flagged vessels transshipped in port. The report also noted that while 32 countries reported no in-port transshipments had taken place in 2017, “...other reports indicate possible transshipment activity in port” occurred for those same 32 countries.⁴

Recommendation: Considering the importance of maintaining the scope and integrity of transshipment control measures, and reinforcing traceability of the catches, ICCAT should adopt stringent reporting requirements for in-port transshipments, such as notifications and reports sent directly to the Secretariat, in-port observer reporting when present, and the requirements that CPCs provide ‘nil’ reports if no transshipment took place in port during the reporting period. In addition, in-port annual transshipment reports should include the same level of detail required for at-sea transshipment annual reports.

- A 2017 summary of the ICCAT ROP¹² states “...With prior agreement from ICCAT, IOTC and CCSBT, observers trained under any of the programmes will be available as observers for all three and will remain on the vessel if it crosses between RFMO areas...” However, there are no reports that clearly illustrate transshipment data collected from neighboring RFMOs, including nil reports. Additionally, there is no reference to this agreement in Recommendation 16-15.

Recommendation: Transshipments that occur with IOTC or CCSBT observers onboard should be included in the ROP annual reports with a clear delineation of the additional number and flag of offloading and receiving vessels involved in transshipments occurring within the ICCAT Convention Area, and the amount of product transshipped. The ROP annual report should also clarify when transshipments occurred involving non-ICCAT observers.

Summary of Recommendations:

This brief clearly demonstrates the need for reform of transshipment management and monitoring in the ICCAT Convention Area. The Pew Charitable Trusts has developed recommendations related to transshipment management aimed towards maximizing transparency and minimizing the potential for illegally caught fish to be laundered into the market. Oversight of transshipment can be improved in ICCAT by implementing the following best practices in three main areas:

Reporting

- Require all transshipment events to be reported to the relevant flag, coastal, and port State authorities and the ICCAT Secretariat, regardless of the transshipment event location or origin of catch being transshipped. The Secretariat should then evaluate the CPC and observer reports to detect any inconsistencies.
- All transshipment authorizations and declarations should be sent to all relevant authorities in near-real time.
- Templates for CPC annual reports should be developed by the Secretariat to ensure standardized data submission per calendar year and enable cross-verification of vessel transshipment reporting.
- Upon entering the Convention Area, carrier vessels should notify the Secretariat of their intent to transship, confirm that an assigned ICCAT observer is on board, and that their VMS is operational.

Monitoring

- Only carrier vessels flagged to CPCs should be allowed to transship within the ICCAT Convention Area and ICCAT should regularly evaluate each CPC's ability to effectively monitor and control its carrier vessels.
- 100 percent observer coverage of in-port transshipments should be required, and all transshipment reports and declarations be sent to the Secretariat including a 'nil' report if no transshipments took place in port during the reporting period.
- The language in Recommendation 16-15 should be revised to require that transshipped products sourced from ICCAT waters but landed outside the Convention Area be accompanied by transshipment declarations until the first point of sale.

Data Sharing

- To ensure sharing of data by relevant authorities, ICCAT should establish and harmonize transshipment data-sharing procedures among relevant flag, coastal, and port State authorities, and RFMO Secretariats.
- Transshipments that occur with IOTC or CCSBT observers onboard should be included in the ROP annual reports with a clear delineation of the additional number and flag of offloading and receiving vessels involved in transshipments within the ICCAT Convention Area, and the amount of product transshipped.
- Members should commit to holding discussions regarding transshipment compliance issues annually in the Compliance Committee and consider developing penalties for serious and/or persistent non-compliance.

References:

¹ Review of the ICCAT Regional Observer Programme; Covering the period September 2012 to August 2013. ICCAT Report for biennial period, 2012-13 PART II (2013) – Vol. 4 Secretariat Reports – Pg. 1215.

https://www.iccat.int/Documents/BienRep/REP_TRILINGUAL_12-13_II_4.pdf

² A summary of the ICCAT Regional Observer Programme during 2017/18. Annual contractors report. Doc. No. PWG – 402/2018: 2018 COM. 08 November 2018 – Pg. 8.

https://www.iccat.int/com2018/ENG/PWG_402_ENG.pdf

³ Report of the 2018 ICCAT bigeye tuna stock assessment meeting: BET Stock assessment meeting – Pasaia, 2018. Pg. 10.

https://www.iccat.int/Documents/SCRS/DetRep/BET_SA_ENG.pdf

⁴ Report on the Implementation of the ICCAT Regional Observer Programme (ROP) for Transshipment 2017/2018. Doc. No. PWG – 402/2018: 2018 COM. 08 November 2018 – Pg. 2.

https://www.iccat.int/com2018/ENG/PWG_402_ENG.pdf

⁵ Netting Billions: A Global Valuation of Tuna. Pg. 11.

<https://www.pewtrusts.org/en/research-and-analysis/reports/2016/05/netting-billions-a-global-valuation-of-tuna>

⁶ ICCAT record of vessels as of June 26, 2019

<https://www.iccat.int/en/vesselsrecord.asp>

⁷ 16-15 Gen Recommendation by ICCAT on Transshipment.

<https://www.iccat.int/Documents/Recs/compendiopdf-e/2016-15-e.pdf>

⁸ Current List of Vessels Presumed to Have Carried out IUU Fishing Activities in the ICCAT Convention Area and other areas

<https://www.iccat.int/en/IUUlist.html>

⁹ Compliance Summary Tables COC_308C on 29/9/2017

http://www.iccat.int/com2017/DocENG/COC_308C_%20ENG.pdf

¹⁰ 2016 Transshipments at sea reported by CPCs. Addendum 3 to Appendix 2. ICCAT Report for biennial period, 2016-17 PART II (2017) – Vol. 4 Secretariat Reports. Pg. 1240.

https://www.iccat.int/Documents/BienRep/REP_TRILINGUAL_16-17_II_4.pdf

¹¹ Report on the implementation of the ICCAT Regional Observer Programme (ROP) for transshipment 2016/2017. ICCAT Report for biennial period, 2016-17 PART II (2017) – Vol. 4 Secretariat Reports. Pg.

1217. https://www.iccat.int/Documents/BienRep/REP_TRILINGUAL_16-17_II_4.pdf

¹² A summary of the ICCAT Regional Observer Programme during 2017. Annual contractors report. ICCAT Report for biennial period, 2016-17 PART II (2017) – Vol. 4 Secretariat Reports. Pg. 1223.

https://www.iccat.int/Documents/BienRep/REP_TRILINGUAL_16-17_II_4.pdf

¹³ ICCAT Regional Observer Program Observer Report (commencing with 188-16) and ICCAT Regional Observer Program Observer Report (commencing with 203-17)

http://www.iccat.int/Documents/Comply/transshipmentreports_current.pdf

¹⁴ Recommendation by ICCAT Amending the Recommendation 13-07 by ICCAT to Establish a Multiannual Recovery Plan for Bluefin Tuna in the Eastern Atlantic and Mediterranean

<https://www.iccat.int/Documents/Recs/compendiopdf-e/2014-04-e.pdf>

¹⁵ Recommendation by ICCAT Amending the Supplemental Recommendation by ICCAT Concerning the Western Atlantic Bluefin Tuna Rebuilding Program

<https://www.iccat.int/Documents/Recs/compendiopdf-e/2014-05-e.pdf>

¹⁶ Report for biennial period, 2018-19 PART I (2018) - Vol. 1 - English version COM

https://www.iccat.int/en/pubs_biennial.html

¹⁷ ICCAT Report for biennial period, 2016-17 PART II (2017) – Vol. 3 Annual Reports

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¹⁸ Comprehensive Reports Assessing the Content and Conclusions of Observer Reports. ICCAT Report for biennial period, 2016-17 PART II (2017) – Vol. 4 Secretariat Reports. Pg. 1235.

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¹⁹ Comprehensive reports. Assessing the content and conclusions of observer reports. Appendix 2. Doc. No. PWG – 402/2018: 2018 COM. 08 November 2018 – Pg. 19.

https://www.iccat.int/com2018/ENG/PWG_402_ENG.pdf

²⁰ ICCAT Report for biennial period, 2016-17 PART II (2017) – Vol. 3 Annual Reports.

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