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**The Pew Charitable Trusts’
Statement to the Compliance Committee of the 26 Regular Meeting of ICCAT
18 November 2019**

Ahead of this year’s meeting, Pew submitted two informational papers to the Compliance Committee, both covering issues related to transshipment (COC-312 Annex 1 & 2). These papers provide an analysis of the information in ICCAT’s publicly available transshipment records and potentially available via Automatic Identification System (AIS). They identify a difference between the data submitted by CPCs and the data provided by the regional observer program and highlight differences between AIS-detected carrier vessel activity and what has been reported to ICCAT. Improved monitoring, data reporting, and compliance review of transshipment – as proposed by the USA in PWG-420 – would advance ICCAT’s understanding of this activity and mitigate potential non-compliance by CPCs. We urge the COC to spend adequate time on this topic and to forward conclusions to the PWG for its consideration. Additionally, we are encouraged that at least three CPCs (Japan, China, and Chinese Taipei) have responded to our analyses by conducting investigations into the transshipment activity of their individual fleets.

Pew also urges the COC to address non-compliance with operational requirements mandated by ICCAT Recommendations. For example, some CPCs continue to submit incomplete FAD management plans, while others fail to reach the minimum of 5% observer coverage for their fleets. Regarding the latter, the SCRS has repeatedly called on ICCAT to adopt higher observer coverage for scientific purposes. The COC should consider the value of further increases in coverage to assess individual vessels’ compliance. The observer programs of some other RFMOs have the dual mandate of assessing compliance and collecting scientific information, and ICCAT should move in this direction. As such, a recommendation by this group to PWG to expand the role of observers to both assess compliance and collect scientific information would help advance the review of the ICCAT observer program (Rec 16-14) which is slated for review this year. One way to improve the observer program, while applying a new compliance mandate, involves the use of electronic monitoring systems in place of human observers.

Pew recognizes that the COC agenda is always full and that the Committee rarely has sufficient time to complete its work. But it is important that the COC address issues related to non-compliance with operational requirements, in addition to quota management. It is also important to develop and implement a system of consequences for persistent non-compliance. These advances are not only important to protect the health of ICCAT-managed stocks but to ensure a level playing field for those that comply with the rules.