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The Pew Charitable Trusts’ Statement to the Permanent Working Group October 2020

The Covid-19 pandemic has highlighted the importance of having mechanisms in place that help RFMOs to ensure legal and sustainable management of fish stocks, including when management needs to happen remotely or absent human observers onboard vessels. The cancellation of this year’s IMM meeting is particularly problematic, as this meeting serves as the starting point for discussion among ICCAT members on the operational issues under the PWG’s charge, including the development and adoption of tools to improve ICCAT’s oversight of its fisheries. During ICCAT proceedings over the next six weeks, it is imperative that ICCAT set a date for the 2021 IMM intersessional, and the agenda should prioritize the following objectives:

- **Improve reporting and monitoring of transshipment activity to minimize opportunities that facilitate the laundering of illegally caught fish through the supply chain.** More specifically, ICCAT should update Recommendation 16-15 to require all vessels involved in transshipments be flagged to a Contracting Party, Cooperating non-Contracting Party, or Fishing Entity (CPC) and that transshipment authorizations, declarations, and observer reports be sent to all relevant authorities in near-real time.
- **Develop an Electronic Monitoring (EM) program to complement human observer coverage.** Recognizing that Recommendation 19-02 directs the SCRS and IMM to recommend EM standards at the 2021 annual meeting, PWG should support the development and implementation of a comprehensive EM program to improve oversight of ICCAT fisheries.
- **Increase the use of IMO numbers to uniquely identify ICCAT fishing vessels and reduce the ability for illegal operators to fish in the ICCAT Convention Area.** In December 2017, the International Maritime Organization (IMO) Assembly adopted Resolution A.1117(30) expanding the IMO Number eligibility criteria to all motorized inboard fishing vessels, including those made of wood, down to a size limit of 12 meters. ICCAT should expand its IMO number requirements as per international best practice to all vessels that are eligible to obtain a number and wish to register to participate in ICCAT fisheries.
- **Ensure CPCs comply with ICCAT’s port State measures and related information exchange requirements.** Port inspectors are on the front lines, preventing illegally caught products from entering the seafood trade. Now that ICCAT’s port State measures Recommendation has entered into force, it is important to ensure the measures are being implemented and information is being shared among the relevant authorities.
- **Effectively deter nationals (both physical and legal persons) from any activities related to illegal, unreported, or unregulated (IUU) fishing.** Recommendation 06-14 should be strengthened to cover nationals not only engaged in, but also those who are responsible for, benefiting from, or supporting, IUU fishing activities (e.g. as operators, effective beneficiaries, owners, logistics and service providers, insurance providers, and other financial service

providers). The ability to change a vessel's flag should no longer protect individuals from consequences of illegal activity.

In addition to our request to forward these items to a 2021 intersessional meeting of IMM, Pew acknowledges that some action regarding the electronic bluefin catch document (eBCD) system will need to be taken this year. We maintain our position that intra-EU trade of bluefin should be tracked by the eBCD with the same oversight required for trade between CPCs to ensure that it does not present a loophole for trade in IUU-caught bluefin. As such, we urge members of PWG to allow the original derogations for intra-EU trade to expire this year, as scheduled.