

# Call for the ICCAT to support stronger transparency and anti-IUU measures

November 2024

Oceana, The Pew Charitable Trusts and WWF are working together to ensure that the EU's engagement with Regional Fisheries Management Organisations (RFMOs) and key partners leads to strong transparency and measures against illegal, unreported and unregulated (IUU) fishing worldwide.

In our comprehensive report titled "[Achieving transparency and combating IUU fishing in RFMOs](#)"<sup>1</sup>, we outline the minimum transparency and anti-IUU fishing measures that we consider essential for RFMO and fishing entities to adopt and implement in order to end IUU fishing.

During the 2023 ICCAT annual meeting, several commendable recommendations were adopted. In particular, we applaud the adoption of Recommendations 23-19 and 23-22 to establish minimum electronic monitoring standards and for a standing catch documentation scheme working group, as well as Resolution 23-20 on labour standards.

In recent months, important discussions on topics such as catch documentation schemes, labour standards, electronic monitoring systems, and climate change have been taking place in working groups. We urge all ICCAT CPCs to continue to actively participate in these discussions towards their prompt conclusions.

**To promote transparency and tackle IUU fishing, we ask ICCAT CPCs to prioritise the following actions:**

## 1. Expand the coverage of electronic Catch Documentation Schemes (eCDS) to cover all ICCAT stocks/species

Well-designed CDS play a pivotal role in enhancing seafood traceability and verifying the legality of fish catches through complex international supply chains. Aligning CDS across all RFMOs is key to combat IUU fishing effectively and, as highlighted by the *ad hoc* CDS Working Group, ensuring interoperability and similar data standards. Clear guidance on the format, use, and key data elements to be included in e-CDS are detailed in a report titled "[Aligning RFMO Catch Documentation Schemes](#)"<sup>2</sup>, and should inform the work of the CDS Working Group.

We are pleased to note the progress made intersessionally which includes the submission of a draft work plan outlining

the recommendation for an expanded ICCAT CDS by the 2026 Commission meeting and the prioritisation of bigeye tuna and swordfish.

**We call on all CPCs to endorse what has been achieved intersessionally, including the basic design characteristics, the proposed work plan and the two identified priority species, Bigeye and Swordfish. Furthermore, we call CPCs to consider including yellowfin tuna in the priority species and to continue to actively participate in the CDS WG with a goal of implementing the proposed work plan ahead of schedule by drafting the recommendation on an expanded CDS ahead of the 2025 Commission meeting.**

The Working Group should follow existing guiding documents such as FAO's [Voluntary Guidelines](#) for Catch Documentation Schemes, FAO's Guide on [Understanding and Implementing Catch Documentation Schemes](#), FAO's Guidance document on [Advancing End-To-End Traceability](#) and the EU IUU Fishing Coalition reports.<sup>3</sup>

## 2. Adopt an ICCAT-wide Electronic Monitoring implementation plan

We welcome the progress achieved by the Electronic Monitoring Working Groups in developing and adopting minimum standards for an ICCAT Electronic Monitoring Programme through Recommendation 23-18. This work is critical considering ICCAT's commendable goal to increase overall observer coverage.

**We call on CPCs to facilitate the implementation of the electronic monitoring standards by updating the EM working group workplan to include developing infrastructure to incorporate domestic programmes. We also encourage CPCs who are trialling electronic monitoring programmes on their vessels to use the adopted ICCAT standards and provide feedback of their use to the 2025 IMM meeting.**

1. [www.iuuwatch.eu/2019/06/new-report-achieving-transparency-and-combating-iuu-fishing-in-rfmos](http://www.iuuwatch.eu/2019/06/new-report-achieving-transparency-and-combating-iuu-fishing-in-rfmos)

2. [www.iuuwatch.eu/wp-content/uploads/2021/12/EU-IUU-Fishing-Coalition\\_Seafood-Traceability-Report\\_Dec-2021-1.pdf](http://www.iuuwatch.eu/wp-content/uploads/2021/12/EU-IUU-Fishing-Coalition_Seafood-Traceability-Report_Dec-2021-1.pdf)

3. EU IUU Coalition. "Seafood Traceability: Aligning RFMO catch documentation schemes to combat IUU fishing" (2021). [www.iuuwatch.eu/wp-content/uploads/2021/12/EU-IUU-Fishing-Coalition\\_Seafood-Traceability-Report\\_Dec-2021-1.pdf](http://www.iuuwatch.eu/wp-content/uploads/2021/12/EU-IUU-Fishing-Coalition_Seafood-Traceability-Report_Dec-2021-1.pdf)

### 3. Revise Recommendation 21-15 to enhance monitoring of at-sea transhipment

Transhipment, the transfer of fish from fishing vessels to carrier vessels, is a major part of the global tuna fishing industry. At sea transhipment often takes place out of sight and far out of the reach of authorities, making it a potential blind spot for effective fisheries management. As such it is considered a high risk activity that should be properly regulated and monitored or otherwise banned.

Strong oversight and port inspections are integral to keep illegal seafood out of global supply chains, particularly because nearly a third of high-value tuna is transhipped<sup>4</sup>. It promotes transparency, improves enforcement of conservation measures, and helps ICCAT member states meet their international commitments to sustainable fisheries. As such, any permitted transhipment activities should only take place between CPCs to ensure that ICCAT conservation and management measures are consistently applied and to achieve a level playing field.

**We call on CPCs to adopt the proposed updates in PWG 422 to align the current transhipment measure to improve alignment with the FAO Voluntary [Guidelines for Transshipment](#). Recommendation 21-15 should explicitly forbid transhipment operations with any vessel included in an RFMO IUU Vessel List and explicitly require that only vessels with an IMO number and subject to ICCAT rules (e.g. by being flagged to an ICCAT CPC or by being required to adhere to ICCAT's reporting requirements) can tranship in the Convention Area.**

### 4. Agree on a High Seas Boarding Inspections Scheme

High seas boarding and inspection schemes within RFMOs are crucial for assessing compliance, combating illegal fishing and promoting responsible marine resource management. We support the creation of a dedicated Working Group to oversee the design and deployment for such a scheme. Such schemes already exist in various RFMOs including CCAMLR, NAFO, SIOFA and WCPFC.

The success of these schemes depends on participation of qualified inspectors onboard vessels capable of sailing into the high seas. Each member of the Commission should have the right to participate in the scheme by training and fielding qualified inspectors and by conducting patrols. In order

to promote consistency, transparency and high equitable participation within the scheme, teams of inspectors should, as a rule, be multinational in makeup and for capacity building initiatives (including training and the development of common operational procedures) to be offered as needed.

**We urge CPCs to continue their deliberations with the goal of adopting a high seas boarding and inspection scheme through a structured and inclusive dialogue. This could be achieved, for example, by forming a dedicated working group to oversee the design and deployment of such a scheme, including the development of capacity building initiatives, by expanding the mandate of the Port Inspection Expert Group for Capacity Building and Assistance (PIEG) to include HSBI or by including HSBI as a standing agenda item in the IMM WG.**

**To support the HSBI discussion at ICCAT, we have published a white paper on high seas boarding and inspection schemes which also includes an indicative step by step guide on how HSBI schemes work.**

### 5. Revise Recommendation 23-17 on port State measures to prevent, deter and eliminate IUU fishing

Adopting effective port State measures minimises the risk of illegally caught fish entering international markets. The FAO Agreement on Port State Measures (PSMA) is the first and only legally-binding, international agreement specifically designed to prevent, deter and eliminate IUU fishing. As such, closer alignment of ICCAT's port State measures with the PSMA will minimise the risk of IUU-caught ICCAT-managed species from reaching the market and will help harmonise PSMs across all regional fisheries management bodies.

**We welcome UK's discussion paper on Strengthening ICCAT's Port State Measures and call on CPCs to amend Recommendation 23-17 to better align it with the FAO PSMA.**

**Furthermore, to improve the collection and exchange of information among the national agencies involved and the implementation of port State measures, we recommend the development of an ICCAT-managed electronic information exchange system that can be connected to the FAO's Global Information Exchange System to guarantee real time data that facilitate risk assessments in port.**

4. The Pew Charitable Trusts. "Transshipment Plays a Major Role in the Global Tuna Industry - Transfer of RFMO-managed species is a billion-dollar business" (2024). <https://www.pewtrusts.org/en/research-and-analysis/issue-briefs/2024/09/transshipment-plays-a-major-role-in-the-global-tuna-industry>

## 6. Improve labour standards and observer safety

Labour standards in ICCAT fisheries are essential for safeguarding the rights and well-being of the often vulnerable workers. Many fisheries are characterised by challenging working conditions, extended periods at sea, and exposure to dangerous elements. Ensuring humane working conditions, fair wages, and safe working practices are not only ethical imperatives but also essential for retaining a skilled and motivated workforce.

Incorporating core labour standards into ICCAT's framework and reporting requirements can also enhance transparency and value to ICCAT's fisheries. Ensuring that fish products are sourced from vessels adhering to high labour practices enables consumers and seafood markets to make more informed and sustainable choices.

As such, we commend the work of the ad hoc Working Group on Labour Standards that culminated in the adoption of Resolution 23-20 on Core Principles on Labour Standards in ICCAT Fisheries.

**We call on more CPCs to report on the core principles as laid out in the Resolution, particularly when it comes to incidents taking place at sea, including those involving observers. Furthermore, we call on CPCs to consider further strengthening the Resolution by including access to internet services as part of the core working and living elements and upgrading Resolution 23-20 into a binding recommendation in the near future.**

## 7. Further expand IMO number requirements to include all eligible vessels

Recommendation 21-14, replacing Recommendation 13-13, introduced the obligation to include the IMO or LR number in the ICCAT record of fishing vessels, for all fishing vessels of 20 metres in length overall or greater authorised to fish in the Convention area, unless justified under paragraph 7.

In addition, the mutatis mutandis clauses in Recommendations 16-05 and 18-02 extended the IMO number requirements established in the former Recommendation 13-13 (replaced by Recommendation 21-14) to the vessel lists for swordfish, albacore and bluefin tuna operations. Thus, in addition to all fishing vessels of 20 metres or greater, vessels down to 12 metres that target bluefin tuna, albacore and swordfish and that are authorised to operate outside waters under national jurisdiction of the flag State, are required to obtain an IMO number.

Although Recommendation 21-14 was a step in the right direction, ICCAT is still not aligned with the IMO criteria<sup>5</sup> and remains the only tuna RFMO that does not require IMO numbers for all motorised inboard fishing vessels, including wooden ones, down to a size limit of 12 metres authorised to operate outside waters under the national jurisdiction of the flag State.

**We call on ICCAT CPCs to fully implement the IMO requirements for vessels targeting swordfish, albacore and bluefin tuna. We urge CPCs to begin deliberations in expanding the application of IMO numbers to all eligible fishing vessels above 12 metres, in line with IMO Resolution A.1117(30) by adopting a work plan or timeline to this effect that includes specific milestones, for example, an interim expansion to 15 metres.**

5. International Maritime Organization Assembly Resolution A.1117(30) of December 2017, [wwwcdn.imo.org/localresources/en/KnowledgeCentre/IndexofIMOResolutions/AssemblyDocuments/A.1117\(30\).pdf](http://wwwcdn.imo.org/localresources/en/KnowledgeCentre/IndexofIMOResolutions/AssemblyDocuments/A.1117(30).pdf), also acknowledged by ICCAT's Compliance Committee in its 2018 annual report [www.iccat.int/Documents/BienRep/REP\\_EN\\_18-19\\_I-1.pdf](http://www.iccat.int/Documents/BienRep/REP_EN_18-19_I-1.pdf).