

Tuna Transshipment in the WCPFC Area: Recommendations to Immediately Improve High Seas Transshipment Monitoring and Reporting

SUMMARY

High seas transshipments continue to be a major component of the tuna fisheries that the WCPFC oversees, but robust independent monitoring of these activities is still limited because the Commission has yet to adopt minimum data standards for observers on carrier vessels. This has led to the observer reports not being submitted to the Secretariat, leaving the Commission and the SPC without access to independent records of transshipment activity. This paper details steps that the Commission could consider this year to formally adopt the existing transshipment forms and mandate their use and submission to the Secretariat. This work will not infringe but should complement the work of the transshipment intersessional working group.

Introduction

In 2019, an estimated 2,961,059 metric tons of tuna was caught in the waters of the Western and Central Pacific Fisheries Commission (WCPFC), accounting for 55% of global tuna catch, and worth about US\$5.8 billion (Williams and Ruaia, 2020). To ensure that fishing on this scale is sustainable, WCPFC needs robust information and effective tools to accurately track catch and vessel activities within its Convention area. Observers have been described as fisheries managers' "eyes at sea" because they submit independent information on catch, bycatch, and other vessel operations. However, this does not extend to transshipments on the high seas in the Western and Central Pacific Ocean (WCPO), where observer reports usually do not reach the WCPFC Secretariat, leaving the Commission and its science provider – the Secretariat of the Pacific Community (SPC) without access to independent records of transshipment activity.

A study on the quantification of illegal, unreported, and unregulated (IUU) fishing in the Pacific Islands region concluded that illegal transshipment is a significant element of IUU activity, accounting for around 26% of overall estimated ex-vessel value of the tuna catches (MRAG 2016). Because of the issues associated with poorly managed and monitored transshipment, in 2018 the 15th Regular Session of the Commission (WCPFC15) recognized the need to review the effectiveness of the current WCPFC transshipment measure (CMM 2009-06). Although the work of the Transshipment Intersessional Working Group (IWG) continues to be delayed due to various reasons, including COVID-19, advancements outside the measure can, and should, be made at the annual Commission meeting. **At the 2021 Annual Meetings, WCPFC members should agree to require that all transshipment observer reports be submitted directly to the WCPFC Secretariat by adopting standardized observer forms and modifying the Regional Observer Program (ROP) Standards and Guidelines, in line with our recommendations below.**

Observer reports are not being submitted to the Secretariat

CMM 2009-06 establishes the terms and conditions for transshipments in areas beyond national jurisdiction, including reporting protocols and the requirement for an observer from the regional observer programme (ROP) to monitor and verify high seas transshipments (CMM 2009-06, para 14 – 17 and 35). CMM 2009-06 only mentions “observer reports” once: “CCMs shall take all reasonable steps to validate and where possible, correct information received from vessels undertaking transshipment using all available information such as catch and effort data, position data, observer reports and port monitoring data.” And nowhere does the measure require observer reports be submitted to the WCPFC Secretariat.

Nevertheless, WCPFC’s Agreed Minimum Standards and Guidelines for its ROP does state that when observer providers “place observers on fish carrier vessels that transship on the high seas [they] should send the completed data forms, workbooks, reports and journals of the observer to the Commission Secretariat where possible within 120 days of the disembarkation of the observer from the carrier.” While some argue that the use of the word “should” does not mandate that this information reaches the Secretariat (Wold and Cook 2019), it is important to note that similar language is used in the same document in relation to reports from observers aboard purse seine and longline vessels and these submission deadlines are currently being treated as mandatory by the Commission; Specifically, it states that “ROP data should be submitted to the Secretariat or SPC where possible within 100 days of the observer disembarking purse seine vessels and within 120 days of the observer disembarking longline vessels.”

According to WCPFC Secretariat staff, because the Commission has not specified the minimum data that ROP observers should collect when monitoring high seas transshipment activities on carrier vessels, no data is actually required to be provided to the Secretariat.” However, as stated on the Commission website “*The Secretariat has developed a set of forms for ROP Observers carrying out observations on carriers transshipping fish from long liners on the high seas. These three forms [FC-1](#), [FC-2](#) and [FC-3](#) are developed as a guide and can be used as they are presented, or can be changed to suit your particular observer programme needs.*”

The current value of high seas transshipment observers

Transshipment observers are not only a means for independent verification, but also key to greater oversight and transparency of transshipment operations. For example, observer report data can increase accuracy of catch reporting and provide information for stock assessments. But while most of the transshipments on the high seas appear to be monitored by observers (Wold and Cook 2019), there is questionable value to placing observers without requiring that the Secretariat receive their full reports. A recent review of WCPO transshipment (MRAG 2019) concluded that:

“While there appears little doubt that carrier companies are complying with the requirement in CMM 09-06 to have observers on board for all high seas transshipments, the usefulness of the information collected to independently verify transshipment reporting appears limited.”

Other tuna RFMOs require observer reports to be sent to the Secretariats

Other tuna RFMOs recognize the importance of independent oversight of transshipments and in most cases, Secretariats have access to transshipment observer reports.

- In the eastern Pacific Ocean, the Inter-American Tropical Tuna Commission (IATTC) has much stronger transshipment observer requirements. The IATTC transshipment measure (Resolution C-12-07) ensures the IATTC Director has access to transshipment observer reports, and also requires fishing vessels to provide a “comprehensive report assessing the content and conclusions of the reports of the observers assigned to carrier vessels which have received transshipment from its [fishing vessels]”.
- In the Indian Ocean, the Indian Ocean Tuna Commission mirrors IATTC transshipment observer reporting and CPC requirements through Resolution 19-06.
- In the Atlantic, the International Commission for the Conservation of Atlantic Tunas (ICCAT) not only requires that observer reports be submitted to the Secretariat, but also makes each transshipment observer report publicly available.

The way forward at WCPFC - Recommendations

As long as there are no transshipment observer reporting requirements to the WCPFC Secretariat, the Commission has no ability to fully monitor and verify transshipment activities in its Convention area. But, transshipment oversight can be significantly improved by adopting available forms and assigning minimum data fields this year:

1. At TCC17, **members should recommend that carrier observer forms be required for submission directly to the Secretariat and that the Commission adopt the currently available set of forms for ROP observers on carriers transshipping fish from long liners on the high seas.** These three forms [FC-1](#), [FC-2](#) and [FC-3](#) on the Commission website can be used provisionally as the IWG continues its work.
2. At WCPFC 17, **the Commission should adopt these prescribed minimum data fields (forms FC-1, FC2, and FC-3) to ensure consistency in data collection.** In addition, **the Commission should agree to modify the ROP Standards and Guidelines document to require observers submit all transshipment observer reports directly to the Secretariat.**
3. In parallel, the Secretariat should continue work with members, the FFA, and SPC to develop standardized carrier observer data collection protocols and training programs.

Conclusion

The above recommendations will secure improved transshipment oversight while not infringing on the work of the WCPFC Transshipment Intersessional Working Group. On the contrary, these new rules will provide valuable information and assist the current CMM review process by the Transshipment IWG.

References

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