

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

October 2023

**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 2022 ICCAT annual meeting, several commendable recommendations were adopted. In particular, we applauded the adoption of *Recommendation 22-14 to promote compliance by nationals*. This expands CPCs duty to investigate IUU allegations and take appropriate action to any natural or legal person responsible for, benefiting from or supporting these activities.

In recent months, important discussions on topics such as catch documentation schemes, labour standards, electronic monitoring systems, labour conditions 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.

Resolution 21-21 laid the foundation of the *ad hoc* CDS Working Group. We express disappointment, however, for the limited participation in the *ad hoc* Working Group, notably with regards to the CDS questionnaire. The latter is of the essence in identifying the risks, practical and technical difficulties, and capacity concerns with the creation of an ICCAT CDS and in addressing them from the outset. The Working Group should also make use of 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 our reports.<sup>3</sup>

**We call on all CPCs to support the "Recommendation on the establishment of a formal Catch Document Scheme Working Group (CDS WG)", as per the conclusions of the ad hoc working group and the IMM of June 2023. We further urge CPCs to actively participate in the CDS Working Group and to provide an actionable way forward in expanding eCDS to additional, and ultimately all, ICCAT stocks/species by 2026.**

### 2. Adopt minimum standards for an ICCAT Electronic Monitoring programme

We welcome the progress achieved by the Electronic Monitoring Working Groups in developing minimum standards for an ICCAT Electronic Monitoring Programme. This work is critical considering ICCAT's direction to develop standards by 2021 and raise observer coverage for most longliners to 10%. While the standards would not mandate that any CPC or vessel use electronic monitoring, it will provide CPCs with the option to use it to meet the observer coverage requirements.

**We call on CPCs to support the adoption of a Recommendation by ICCAT to Establish Minimum Standards and Program Requirements for the use of Electronic Monitoring Systems on ICCAT Fisheries, in line with the established work plan, to ensure consistency and uniform use of electronic monitoring.**

<sup>1</sup> [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/)

<sup>2</sup> [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)

<sup>3</sup> 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. 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.

These initiatives help detect and deter IUU fishing and enhance transparency and accountability by highlighting infractions to flag States of regulations and standards, preventing overfishing, and supporting sustainable fishing practices. By safeguarding the high seas, these schemes ensure the long-term health of our oceans and the well-being of communities reliant on fisheries. More importantly, they achieve this through the pooling of precious and often very costly resources, contributing to the democratisation of oversight of the high seas.

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 support the adoption of a high seas boarding and inspection scheme as per the IMM-endorsed proposal as well as the resolution on the creation of a dedicated working group to oversee the design and deployment of such a scheme, including the development of capacity building initiatives.**

### 4. Endorse core principles and continue work on labour standards

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.

**We commend the work of the ad hoc Working Group on Labour Standards and calls on CPCs to adopt the resolution. We further call on CPCs to continue their work on this topic, consider further strengthening the resolution by including access to internet services as**

**part of core decent working and living elements and to report on the implementation of this resolution following its adoption, particularly when it comes to incidents taking place at sea. Finally, we look forward to having this upgraded into a binding recommendation in the near future.**

### 5. Revise Recommendation 18-09 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. ICCAT's Resolution on Port State Measures must be better aligned with the Port State Measures Agreement. It must decrease any implementation gaps, improve national coordination with other port controls or counter-IUU fishing measures, and better exchange information, both among national agencies involved in the application of the Resolution and with other relevant States and bodies.

**We recommend the development of an ICCAT-managed electronic information exchange system that includes information on denials of port access and inspection results. This would facilitate risk assessment in port.**

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

The recently adopted 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. As acknowledged by the ICCAT's Compliance Committee in its 2018 annual report,<sup>4</sup> the International Maritime Organization Assembly Resolution A.1117(30) from December 2017,<sup>5</sup> request to expand the IMO number eligibility criteria to 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 welcome the progress achieved through the adoption of Recommendation 21-14, but call on ICCAT CPCs to fully implement the IMO requirements for vessels targeting swordfish, albacore and bluefin tuna and explore further expanding the application of IMO numbers to all eligible fishing vessels above 12 metres, in line with IMO Resolution A.1117(30).**

<sup>4</sup> International Committee for the Conservation of Atlantic Tunas, Report for biennial period, 2018-2019, Part I (2018) - Vol. 1, [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)  
<sup>5</sup> [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)