

Towards a more equitable allocation of eastern Atlantic and Mediterranean bluefin tuna - continued

(Discussion paper submitted by the United Kingdom)

Introduction

Since the last TAC for BFT-E was established, which saw 89.8% of the 4,570 t increase distributed to only seven parties, the UK has consistently made the case for a fairer approach to determining quotas in this stock which properly takes into account the plans and aspirations of coastal State small harvesters while continuing to accommodate the expectations of the large harvesters.

At the Intersessional Meeting of Panel 2 held in March 2024, the UK presented paper [PA2_24_REV/i2024](#) which described two possible approaches to reallocating the TAC in TAC increase and stable TAC scenarios to divide it more equitably between interested CPCs. Other approaches were also tabled by Egypt and Korea (Rep.). We are grateful for the extended time made available for those discussions, which were productive, and which confirmed that several Panel 2 members continue to find the current quota allocations unsatisfactory and inequitable.

Ahead of the next TAC decision in 2025, the UK wishes to maintain momentum on these discussions and tables this paper to the 2024 Commission meeting for that purpose. We include a request that the March 2025 intersessional meeting be similarly extended by two days to allow for further in-person discussions, with the aim of enabling positive and constructive negotiations at the 2025 Commission meeting.

Explanation of work since the March intersessional meeting

Since the March intersessional meeting we have been working on two things: refining the approach we presented for distributing a TAC increase and developing a mechanism to avoid 'quota under-utilisation'. In doing this we have reflected carefully on the feedback received from Panel 2 members in March, including concerns about taking quota away from CPCs who have capacity to fish it and allocating it to others who do not; the ongoing concern to recognise coastal and developing States; the suggestion to consider a criterion around CPCs' contribution to BFT science, and the difficulty applying the existing 27 allocation criteria and conditions set out in Res. 15-13.

Changes to the approach presented in March

In the first instance, we have been working to refine the approach we presented for distributing a TAC increase and make it as objective as possible. Whereas previously we had allowed for a stage of manual adjustments to address particular impacts or imbalances, we have replaced that with a modelling solution based on objective, easily identifiable criteria.

Our modified approach would see roughly half of any uplift distributed between major harvesters, linked to current shares (as set out in Rec. 22-08) in a reflection of, and proxy for, historic catch.

The remainder of any uplift would then be shared between all relevant CPCs, prioritising CPCs who are coastal States and/or developing States, and CPCs with smaller shares (<1,500 t). This works by scoring CPCs based on the attributes above and ranking them in reverse order based on size of current quota: so, for example, if CPC A and CPC B are both developing coastal States then the CPC with the lowest quota will be ranked higher, and receive a higher percentage of this part of the uplift than CPCs with higher quotas. See **Figure 1**, which illustrates this approach.

We acknowledge that some CPCs raised the prospect of using other criteria to determine quota allocations, but also note the generally-shared conclusion that weighting and applying lots of different criteria – especially where these are not easily quantifiable or indeed widely agreed as important – is very complicated. We have therefore opted to keep things as simple as possible and focus on a small number of criteria which are broadly easily understood and generally accepted as important:

- Coastal State status – CPCs with bluefin present in their waters.
- Current quota allocations – as a reflection of and proxy for historic catch.
- Developing State status as defined by UN/OECD.
- Small quota holders – CPCs with less than 1,500 t.

We considered including a criterion based on contribution to BFT science but concluded that it would potentially be discriminatory in nature, i.e., because it requires significant resources or indeed substantial quota to meet. We remain open to discussion on this and other points and look forward to tabling further details of our revised approach at the March 2025 intersessional meeting.

To conclude this section, we recognise that other CPCs have previously tabled alternative proposals for distributing the TAC and may wish to do so again, and that Panel 2 has not yet decided on the most appropriate approach. The point we wish to stress once again is that Panel 2 will need to adopt a fairer approach to distributing any TAC increase agreed in 2025 if it wishes to reach consensus, as well as agreeing how to approach a possible stable TAC scenario, given that the status quo does not meet the needs of several Panel 2 CPCs.

Quota under-utilisation mechanism

In the second instance, we have worked to respond to the concern that CPCs that may receive quota increases in 2025 might not immediately have the capacity to use it all, whereas others may have capacity that exceeds their quota, by developing an additional mechanism to manage ‘quota under-utilisation’.

This additional idea starts from the premise that Panel 2 will agree new quotas in 2025 based on a methodology to be agreed – whether that is one of the options proposed by the UK or something different – to achieve greater equity and increased fishing opportunities for small harvesters who need more quota.

These new quotas will be reflected in the quota table in the BFT-E measure which will replace the current Rec. 22-08 (25-XX). All CPCs will therefore have certainty on their quotas for the next three-year TAC cycle (2026-2028).

As a reminder, under the UK's proposed approach for determining new quotas using the TAC increase agreed in 2022 as an illustration, all Panel 2 CPCs currently on the BFT-E quota table would benefit from a quota increase compared to their quotas in Rec. 21-08 and the reserve to deal with expected new entrants would also be increased – what varies is the % increase each CPC receives.

We then propose to use the existing intersessional process in each year of the next TAC cycle to review available capacity of each CPC, creating a ‘surplus pot’ of any additional BFT-E quota that a CPC has been allocated but is not immediately able to fish. Other CPCs that do have capacity can then request a quota ‘top-up’ from that surplus pot for that particular year. In this way:

- Smaller harvesters that need more quota have the assurance that they have an increased quota for the duration of the TAC cycle and can plan/build their capacity on that basis.
- Larger harvesters that have made sacrifices to accommodate the new quotas have assurance that if smaller harvesters do not immediately have the capacity available to fish their new quotas, there is an annual mechanism for them to make use of it.
- Panel 2 uses its existing intersessional processes to provide appropriate checks and balances and keep this new approach under review.

To establish the mechanism for creating and administering this new surplus pot, textual amendments to the current Rec. 22-08 would be required at the same time as agreeing new quotas, at the 2025 annual meeting.

The intersessional process would run as usual in years 2026, 2027 and 2028. Thereafter Panel 2 could decide whether to continue with this approach or confirm alternative quotas and arrangements.

A step-by-step explanation of this proposal, including the draft textual changes that would be needed to Recommendation 22-08, is attached in **Annexes 1** and **2**, respectively, and summarised in the **Figure 2** below.

Request to Panel 2 for agreement at the 2024 Annual Meeting and next steps

We look forward to discussing these and any other ideas at the Panel 2 sessions at the upcoming Annual Meeting, and beyond that at the March 2025 intersessional meeting, with a view to agreeing a more equitable distribution of the next BFT-E TAC at the 2025 Annual Meeting, to be applied from the start of the next management cycle in 2026.

The UK hereby requests that, as was the case in 2024, an additional two days are added to the dates for the March 2025 intersessional meeting for this purpose.

We strongly urge all Panel 2 members to engage in these discussions and to openly state whether their current BFT-E quota meets their needs, or whether they will be seeking an increase in quota at the 2025 negotiations.

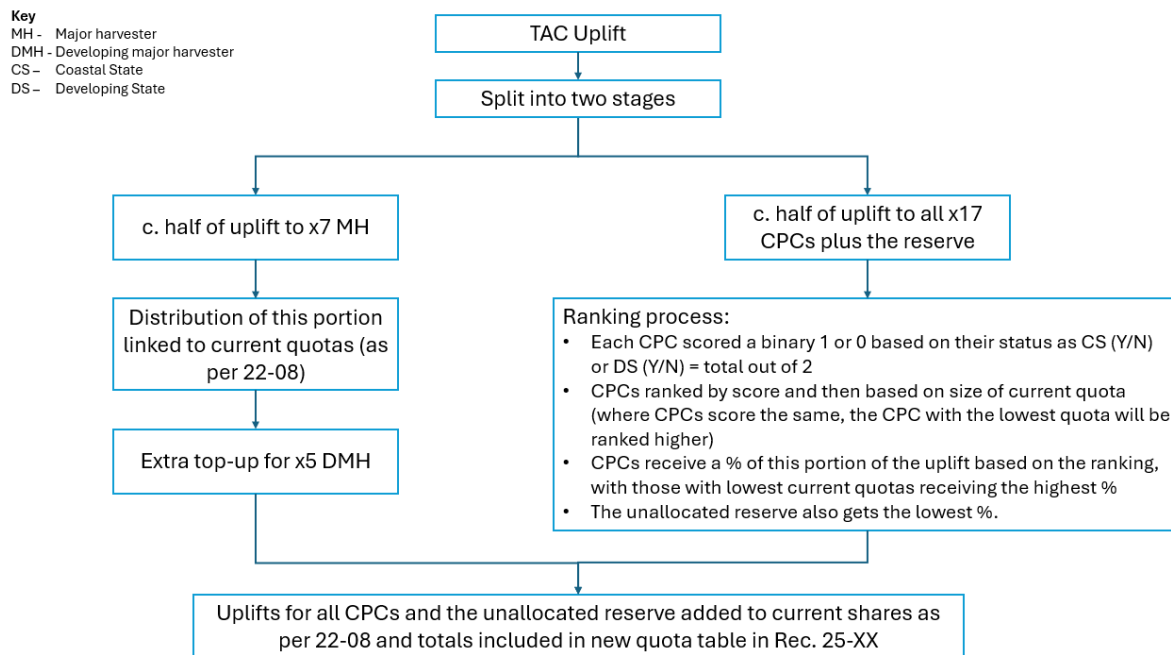


Figure 1. Modified approach for distributing a TAC increase.

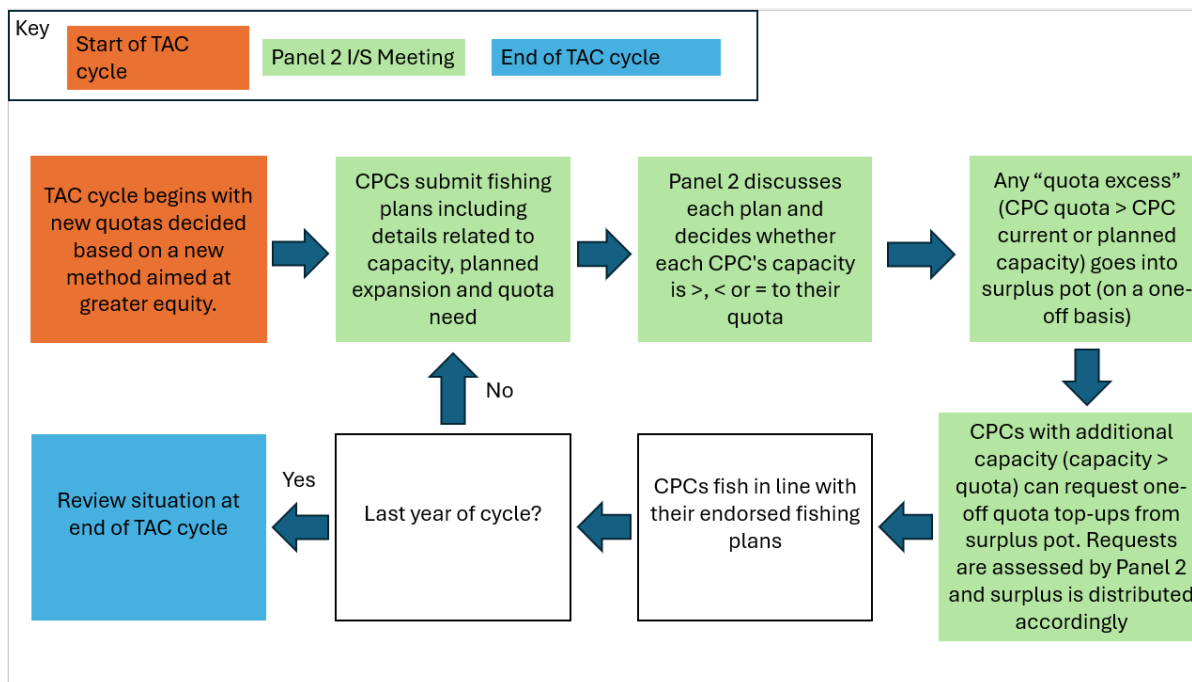


Figure 2. Flowchart summarising the proposed quota under-utilisation mechanism.

Step-by-step explanation of proposed quota under-utilisation mechanism

2025

Step 1: Amendments to Rec. 22-08 agreed/adopted (November 2025 Commission Meeting)

Amendments to two elements of Rec. 22-08 are required to implement the new mechanism:

1. Rec. 22-08 Paragraph 4 quota table to be amended. Changes to quotas will be aimed at increased equity and increased fishing opportunities for small harvesters. The methodology for establishing the new quotas is to be agreed by Panel 2 but could, for example, be one of those presented at the March 2024 Panel 2 Intersessional Meeting, a modified version of one of those, or an alternative approach agreed by the Panel.
2. Additional text to be added to Rec. 22-08 (see **Annex 2**) to create a mechanism for transferring any quota uplift (i.e. increase compared to Rec. 22-08) to a 'surplus pot', from which other CPCs can request a quota top-up. This would be managed as part of the intersessional BFT-E management process. Such transfers and top-ups would be on an annual basis only and would not affect the quotas set out in the Paragraph 4 quota table.

These amendments to be agreed by Panel 2 and then adopted by the Commission as Recommendation 25XX.

2026

Step 2: 2026 BFT-E fishing and capacity management plans submitted (Feb 2026)

Panel 2 members submit their BFT-E fishing and capacity management plans, providing additional details on current fleet capacity and planned in-year capacity expansion, as required by Rec. 25-XX (again see **Annex 2**).

Step 3: Panel 2 determines over- or under-capacity to fish BFT-E, agrees any redistribution of 'surplus' quotas and endorses fishing plans (Panel 2 Intersessional Meeting March 2026)

CPCs' BFT-E plans are presented, and endorsed, via the usual intersessional process.

As part of that process, the Panel will determine whether each CPC's fishing capacity is less than, equal to, or greater than its available quota (quota as per Rec. 25-XX, plus any carryover) for the quota period. This determination will be based on information on capacity provided in the CPC's plans, alongside catch rates provided by the SCRS or, if catch rates are not available, historic catches.

If the Panel concludes that any CPC will not have capacity to fish its quota within the quota period (i.e., quota > capacity), any of the quota uplift (i.e., increase compared to Rec. 22-08) that it has received and that it does not have capacity to fish is transferred into a 'surplus pot'. Two examples of how surplus quota is determined are provided below.

If the Panel concludes that any CPC that could potentially fish more than its annual quota (capacity > quota), the CPC can request a quota top-up from the surplus pot. The Panel will decide how to allocate top-ups but an example approach is provided below.

Such transfers and top-ups would be on an annual basis, i.e., for one year only: CPCs' quotas as set out in Rec. 25-XX will not change and each CPC's 'capacity vs. quota' will be examined again the following March. This gives assurance that the same minimum amount of quota will be available to each CPC for each year of the three-year TAC cycle, while providing flexibility so that any quota a CPC cannot use can instead be used by another CPC.

2027 and 2028

Steps 2 and 3 are repeated in 2027 and 2028 (the second and third years of the 2026-28 TAC cycle). Each year, CPCs' plans are to be based on quotas set out Rec. 25-XX (plus any carryover).

Annual reviews of capacity in 2027 and 2028 will take into account fishing activity by the CPC in the preceding years of the TAC cycle, but this shall not give rise to any automatic or preferential access to quota top-ups in either of those years.

Two examples of how quota surpluses are determined

CPC A receives a 100 t quota uplift under Rec. 25-XX. Based on SCRS catch rates, Panel 2 concludes that CPC A can fish 50 t in its directed BFT-E fishery. CPC A has a further vessel that does not target BFT-E but could bycatch it. The CPC estimates bycatches to be 2 t; this is then agreed by the Panel and is added to the CPC's total capacity figure, which equals 52 t. 48 t is moved to the excess pot for 2026 only.

CPC B receives a 100 t quota uplift. The SCRS has not provided catch rates for the gear type CPC B uses. Historic catch data are therefore used to determine capacity. The Panel concludes that CPC B can fish 75 t of its quota. 25 t is moved to the excess pot for 2026 only.

Example of how excess quota is allocated to CPCs requesting top-ups

The excess pot contains 320 t quota. CPC A, CPC B and CPC C respectively request 90 t, 100 t and 150 t. Sum of requests equals 360 t, which is greater than total quota in the pot. Quota from the pot is distributed equally until the smallest request is met, and process is then repeated until all quota is reallocated:

1. CPC A, CPC B and CPC C each receive 90 t (total of 270 t reallocated; 80 t left). CPC A's request is fully met at this point.
2. CPC B and CPC C then each receive a further 10 t (total of 290 t allocated, 30 t left). CPC B's request is fully met at this point.
3. CPC C then receives 30 t (total of 320 t allocated; 0 t left). CPC C's request is not fully met but quota available from the pot is exhausted.

Draft amendments to Rec. 22-08 to establish the proposed quota under-utilisation mechanism**14. (bis)**

Each CPC shall, in its annual capacity management plan, provide details of any recent or planned expansion in fishing capacity which demonstrate its ability to utilise its allocated quota of BFT-E (quota as per paragraph 4 quota table plus any carryover authorised in accordance with paragraph 6) within the quota period. Such details shall include, but are not limited to, number of fishing vessels, vessel size, fishing method, gear, and an indication of how much quota vessels are expected to fish.

14. (ter)

At its intersessional meeting in March of each year, Panel 2 shall assess each CPC's capacity to fish its quota during the quota period. This assessment shall be based on, but not limited to, consideration of the following factors:

- information provided in the CPC's capacity management plan.
- SCRS catch rates for the gear types to be used.
- if SCRS catch rates are not available for those gear types, historic catch.
- the need to account for bycatch by vessels that do not target BFT-E.
- additional considerations e.g. natural disasters, conflict, etc.

14. (quarter)

Where, on the basis of these considerations, Panel 2 concludes that a CPC has insufficient capacity to fish its quota during the quota period, any of that quota that constitutes an uplift (i.e. is an increase compared to quotas set out in Recommendation 22-08, paragraph 4) shall be transferred to a surplus quota pot.

14. (quinquies)

This surplus quota will be made available to other CPCs that Panel 2 concludes have capacity to utilise it, and which are either already quota holders for BFT-E in accordance with paragraph 4 of this Recommendation, or that Panel 2 concludes are coastal States for BFT-E based on information provided by the CPC. Surplus quota will be allocated to such CPCs upon request and shared via a process to be determined by Panel 2.

14. (sexies)

Any transfers of quota to the surplus pot and any top-ups provided to other CPCs from that pot will be on a one-off basis, i.e. for one year only, and will not change CPCs' quotas as established by paragraph 4 of this Recommendation. Each year CPCs shall prepare their BFT plans on the basis of the quota table in this measure plus any carryover from the previous year.