

**The Pew Charitable Trusts**  
**Recommendations to the Inter-American Tropical Tuna Commission**  
**94<sup>th</sup> Meeting of the IATTC**  
**22-26 July, 2019**  
**Bilbao, Spain**

The Inter-American Tropical Tuna Commission (IATTC) is mandated to sustainably manage tunas, sharks, and other highly migratory species in the eastern Pacific Ocean, while avoiding the catch of non-target species important to the health of the ecosystem. When the Commission holds its annual meeting July 22-26, 2019 in Bilbao, Spain, members should take the following actions, in order to uphold its mandate:

- Improve the oversight and accountability of transshipment operations;
- Increase longline observer coverage and develop an electronic monitoring program;
- Modernize fisheries management by developing precautionary harvest strategies;
- Adopt strong controls at port to deter illegal, unregulated and unreported fishing; and
- Request cost-benefit study on options to enhance vessel monitoring system (VMS) data.

**Improve the oversight and accountability of transshipment operations**

IATTC should amend the transshipment resolution (C-12-07) to increase the verification and transparency of transshipment in the Convention area and strengthen monitoring and control of this activity. The number of transshipments reported to the IATTC Secretariat has grown 65 percent since the adoption of the transshipment resolution in 2012. A recent analysis using automatic identification system data, or AIS, found discrepancies between detected carrier vessel activity and what was reported to IATTC, indicating the possibility that unauthorized transshipments may have occurred in the IATTC Convention Area in 2017.

As transshipment continues to increase, IATTC should update its resolution with the following requirements to ensure proper oversight of this practice:

- Require that vessels involved in transshipments be flagged to a member government or cooperating non-member government and that transshipment authorizations and declarations be sent to all relevant authorities, including the Secretariat in near real time;
- Mandate that carrier vessels notify the Secretariat of their intent to transship IATTC-managed species when entering the Convention Area and confirm the presence of an observer and an operational vessel monitoring system, or VMS; and
- Ensure that observer reports are sent directly to the Secretariat and that all transhipped catch, including sharks, be reported by species on the transshipment declaration form.

In addition, IATTC should provide public access to historical carrier and fishing vessel transshipment authorization lists; and enhance the MOU with the Western and Central Pacific Fisheries Commission (WCPFC) as well as its Regional Observer Program to improve oversight of transshipment occurring in WCPFC waters by carriers on IATTC trips.

### **Increase longline observer coverage and develop an electronic monitoring program**

IATTC should require 100 percent observer coverage of all longline operations to ensure that catches are verifiable and legal, and to increase the quality and availability of scientific data. As a step toward that goal, IATTC this year should commit to building the infrastructure necessary to successfully implement an EM program by directing the scientific staff to develop minimum standards and requirements for data collection and reporting. Increased longline observer coverage can be achieved by complementing onboard human observers with electronic monitoring (EM) technology. In addition, the Commission should provide additional funding to continue the EM initiatives for small purse seiners and expand the trials to longline vessels.

Increasing longline observer coverage should be undertaken urgently. Most IATTC members have failed to achieve the minimal level of scientific observer coverage on their large longline vessels that has been required since 2013 under Resolution C-11-08. Even if the required 5 percent of longline fishing activity is overseen by onboard observers, the IATTC scientific staff has indicated the required level of coverage is too low to provide sufficient data on all types of catch.

### **Adopt strong controls at port to deter illegal, unreported and unregulated fishing**

Illegal, unreported, and unregulated (IUU) fishing is a global threat that also affects the eastern Pacific Ocean. To prevent IUU-caught fish from reaching the market, members should adopt strong controls at port. The IATTC does not have a port inspection scheme, despite seven years of discussions. This represents a serious gap in regional efforts to stop IUU fishing, and leaves IATTC an outlier when most RFMOs have adopted and are implementing port State measures.

The Commission should adopt the proposal to establish an IATTC scheme to:

- ensure that States designate ports for use by foreign fishing vessels;
- require prior notification from vessels wishing to use ports;
- allow for denial of entry into port;
- set minimum standards for inspection in port; and
- provide guidelines for effective port inspections so action can be taken against vessels having engaged in IUU fishing.

In addition, the Commission should consider how the Special Sustainable Development Fund (Resolution C-14-035) may be used to help implement port controls.

### **Modernize fisheries management by developing precautionary harvest strategies**

To advance the harvest strategy process, IATTC members should provide the necessary funding required for management strategy evaluation (MSE) and create a Scientist-Manager Dialogue Working Group, as the IATTC Scientific Advisory Committee recommended last year. All five tuna RFMOs have developed or are developing harvest strategies using MSE to increase the efficiency,

effectiveness, and predictability of management. IATTC is earlier in the process compared to the other tRFMOs, but the staff scientists have drafted a workplan to advance MSE, starting with bigeye tuna. As part of this process, IATTC's interim harvest control rule (HCR) and reference points for tropical tunas should be: a) more thoroughly evaluated using MSE and b) fully specified to become a comprehensive harvest strategy, detailing the HCR as well as its data inputs and assessment method. The performance of additional candidate harvest strategies would be evaluated alongside the interim HCR to determine which approach would best achieve the management objectives for the stock or fishery, irrespective of the uncertainty in the system.

Creation of a Scientist-Manager Dialogue Working Group is critical to the success of the harvest strategy approach because the approach relies on an iterative, communicative process among scientists, managers and stakeholders. The regional MSE workshops planned for 2019 are excellent for capacity building but do not take the place of a formally established body with the authority to make recommendations to the Commission on harvest strategy-related issues ranging from management objectives to the final harvest strategy. Several other RFMOs have already established such dialogue groups.

In the meantime, until harvest strategies are in place, members of the IATTC have a responsibility to act this year to end overfishing of valuable yellowfin, bigeye and Pacific bluefin stocks. That will require agreeing to appropriate reductions in tuna catches and fishing effort.

### **Request cost-benefit study on options to enhance vessel monitoring system (VMS) data**

IATTC should request a formal cost-benefit analysis (CBA) on options to enhance VMS in the Convention area. VMS provides a high degree of detailed and verifiable information critical in the fight against IUU fishing. In addition, IATTC should consider the need for a VMS Steering Committee to guide the study and recommend a preferred option to next year's annual session.

In 2004 the Commission approved Resolution C-04-06 on the establishment of a vessel monitoring system (VMS). This Resolution states: *"...each Party with tuna-fishing vessels 24 meters or more in length operating in the Eastern Pacific Ocean and harvesting species for which the Commission has established conservation and management measures shall, by January 1 2005, or as soon as possible thereafter, establish a satellite-based vessel monitoring system (VMS); except that a Party that already has such a program in effect shall be deemed to have satisfied this requirement..."*

The Resolution was amended in 2014, leading to Resolution C-14-02. The primary reason was to make mandatory by January 1st, 2016 the use of VMS in all commercial fishing vessels 24 meters or more in length operating in the eastern Pacific Ocean (EPO) and harvesting tuna or tuna-like species. This Resolution also states: *"...each CPC shall provide to the Director, by 31 May 2017, a progress report on its VMS consistent with this resolution. The Commission will discuss how best to proceed with future consideration of VMS to support its conservation and management*

*program at its annual meeting in 2017, including the possible development of a stand-alone IATTC VMS scheme...”*

Momentum on enhancement of VMS within IATTC has been slow. At the last session, the Secretariat presented the paper, “Some Considerations Related to Use of VMS in the EPO and the Possible Development of a Stand-Alone IATTC VMS Scheme,” (IATTC Document 93-05). The paper made a case for a stand-alone VMS system for IATTC but was not widely accepted. Other Members asked for more details and a more concrete proposal.

In an effort to continue to move the issue forward in the spirit of wording in Resolution C-14-02, members should consider requesting the CBA on options to enhance VMS, which would build upon the considerations in the Secretariat’s paper.

### **Improve management of Fish Aggregating Devices (FADs)**

IATTC should improve the management of FADs to mitigate the impact on tuna populations and the ecosystem. To do that, IATTC should limit the number of sets that can be made on FADs, as part of measures to reduce fishing mortality on bigeye tuna, and reduce the individual per vessel limit on the number of FADs that can be deployed in the water at any one time; very few vessels made more than 400 FAD deployments in 2016, meaning the current limitation is not restrictive at a time when the total number of FADs deployed in the Convention area is increasing. In addition, IATTC should heed the recommendations of the [2<sup>nd</sup> Joint tRFMO FAD Working Group](#) to improve data collection on FADs, prohibit the use of mesh netting on FADs, accelerate use of biodegradable materials in FADs and explore comprehensive recovery and retrieval options.