



The Pew Charitable Trusts
Statement to the 104th Meeting of the Inter-American Tropical Tuna Commission
August 31-September 4, Lisbon, Portugal

The Pew Charitable Trusts welcomes the opportunity to participate in the 104th meeting of the Inter-American Tropical Tuna Commission (IATTC) as an observer. We urge Members to hasten the adoption of new approaches that will provide greater resiliency and stability for the region's fisheries. As such, we urge Members to make the following decisions:

Adopt management procedures for IATTC stocks

Members, industry and non-governmental organizations agree that the development of management procedures (MP), also called harvest strategies, using management strategy evaluation (MSE), is key to the future sustainability and profitability of the region's fish stocks. Two MSE-tested management procedures should be adopted this year, recognizing that the scientific analysis is complete and that viable candidates are on the table that would meet Members' objectives:

- **Adopt an interim, multi-species MP for tropical tunas based on concepts in [Proposal A-2](#), [Proposal T-1](#) and [Proposal T-2](#)**, which would move IATTC toward proactive management that makes use of the latest analytical tools and capitalizes on the improved status of tunas in the eastern Pacific. The adopted MP should manage both the purse seine and longline fishery starting in 2027 and clearly outline an exceptional circumstances protocol as well as the additional MSE development work to be conducted during the initial six years of application.
- **Adopt a MP and implementing measure for Pacific bluefin tuna that reflect the agreement recently reached by managers across the Pacific** and would ensure long-term sustainability for this formerly depleted species. Adoption would represent the culmination of international efforts to restore and sustainably manage this valuable and ecologically important fishery.
- **Establish a process for MP development for dorado and swordfish** by adding MSE initiatives to the respective proposals ([J-1](#) and [J-2](#) for dorado and [U-1](#) for swordfish), which call for development of harvest control rules for those valuable but often overlooked stocks.

- **Advance management of south Pacific albacore** by agreeing to the provision of fishing data needed to assess the stock in 2027 and develop an eventual MP that is consistent with the one adopted by the Western and Central Pacific Fisheries Commission.

Strengthen the effectiveness and transparency of the compliance review process

A robust, efficient, and transparent compliance review process is essential in ensuring members are held accountable for meeting their obligations, identifying members' capacity needs, and supporting sustainable fisheries. As such, members should:

- **Adopt a table of categories of non-compliance and specific follow-up actions**, which would establish clear, automated and transparent responses.
- **Agree on a workplan, with timelines, to update Resolution C-22-02** to incorporate the use of those categories of non-compliance and assignment of mandatory follow-up actions, that includes:
 - A clear process to review potential cases of non-compliance and agree on a status and follow-up action;
 - A three-month deadline for submission of missing information;
 - A standardized template for CPC Compliance Action Plans; and
 - An annual review of CPC Compliance Actions plans.
- As recommended by COR16 and adopted by the Commission, **publicly publish a final compliance report**, that includes:
 - A summary of the key issues identified during the review;
 - An update on previous years' compliance assessment status;
 - The current status of each member for each Resolution; and
 - Any corrective/follow up actions recommended by the COR.

Reduce the ecosystem impacts of fishing

Members have agreed to consider the impact of fishing on the wider ecosystem. But more is needed to translate the obligation in the Antigua Convention into operational practices. **Members should adopt [Proposal P-1](#), which articulates how the Commission should incorporate ecosystem considerations into the development and adoption of conservation and management measures, whenever possible.** However, Members should strengthen the proposal by agreeing to develop operational objectives, as part of the implementation plan it anticipates. These operational objectives can be more comprehensive and dynamic than objectives used in traditional fisheries management by, for example, seeking to maintain or enhance ecosystem structure and function (or food web functioning). These actions would support the commitments of many Members in several international agreements, including the Reykjavik Declaration on Responsible Fisheries in the Marine Ecosystem.

Take immediate steps to improve shark science and management

We are concerned that action needs to be taken urgently to improve the status of key shark species in the eastern Pacific Ocean, including hammerheads and silky sharks, and we are concerned by the inability of the IATTC to assess several shark provisions for their effectiveness. **Several proposals to deter shark captures and improve data collection and research are before the Commission and should be adopted.** Specifically, we urge the Commission to remove the options to avoid landing sharks with their fins naturally attached ([Proposal C-1](#)), endorse the shark research plan and accelerate its implementation ([Proposal C-2](#)), and adopt improvements to data collection and safe handling and release practices ([Proposal C-3](#) and [Proposal N-1](#)). While these steps would be meaningful, more should be done in the absence of greater information. It would be precautionary to reduce the impact on hammerhead and silky sharks by amending Resolution C-25-09 to eliminate the remaining use of wire (steel) leaders in longline fisheries and require longline-caught sharks to be freed with as little trailing gear as possible.

Improve the independent monitoring of fisheries in the Convention Area

It has been a long-standing recommendation by the Scientific Staff that the current observer coverage requirements for longliners should be increased, as the current levels do not provide adequate data to accurately measure the impact of the Commission's fisheries on either target or bycatch species. Additionally, both the Staff and the Scientific Advisory Committee have recommended that an observer program be developed for small purse seiners (Class 1-5), which currently rarely carry any observers and therefore face the same independent data challenges. To address these pressing issues, Members should:

- Immediately increase the required independent monitoring requirement to 20% for longliners and small purse seiners and allow the requirement to be met using a combination of human observers and electronic monitoring.
- Agree to a phased approach to increase the independent monitoring requirement to 100% within five years for longliners and small purse seiners

Advance the development of a Commission electronic monitoring program

In 2024, the Commission adopted interim electronic monitoring (EM) minimum standards, which was a significant step towards implementing EM for vessels fishing in the Convention Area. To continue to advance the work and to allow for the operationalization of the adopted standards, the EM Working Group (EMWG) should begin development of a draft institutional structure for an IATTC EM program. As part of that structure, the EMWG should recommend that the IATTC EM program include:

- A clear understanding of the roles and responsibilities of the Secretariat, CPCs, and any third party, if applicable;
- An accreditation process that ensures that CPC EM programs are meeting the adopted standards; and
- An assurance process that provides independent review of data submitted by CPC programs, including an audit of a portion of the EM footage to ensure data quality.

We also urge the members of the EMWG to work intersessionally to develop a workplan and timelines to develop recommendations (including a draft Resolution) for the IATTC EM Program, as well as to review and update the interim EM standards, including incorporating recommendations from the [FAO EM Harmonization workshop](#).

Reduce opportunities for illegal, unreported, and unregulated (IUU) fishing

Effective port State measures minimize the risk of illegally caught fish entering international markets. Since IATTC adopted Resolution C-21-07, more CPCs have opted into the measure (20 out of the 26). However, the IATTC scheme still remains voluntary. Plus, several aspects of the resolution do not fully align with the effective practices of the FAO Agreement on Port State Measures (PSMA). **Members should update IATTC's port State measures resolution to ensure that all CPCs are required to implement effective port State controls that are in line with other RFMOs and support effective international best practice.** This update should:

- Strengthen provisions, especially in relation to national coordination and information exchange, which are critical to ensure real time data exchange and inform effective decision making at port; and
- Mandate the use of a regional port State electronic exchange system, either one developed by IATTC, another RFMO system or application of the PSMA Global Information Exchange System (GIES), which in consultation with the FAO could be enhanced to meet the region's specific needs.

Further, the IATTC should promote greater transparency over who engages in and profits from fishing operations. **Members should adopt a new measure to prevent their nationals from deriving benefits from or supporting IUU fishing and discuss amending the IATTC vessel registry (Resolution C-24-07) to collect the beneficial owner's name and country of residence.** The beneficial owner is the person or entity who profits most from the vessel's activities. Collecting this data would help ensure that fishery managers know exactly who is fishing within the Convention Area and empower them to take appropriate and prompt action.

Finally, we welcome the progress in developing a catch documentation scheme (CDS) for bluefin tuna and call on members to continue deliberations to adopt a CDS at the 2027 Commission meeting.

Assess the impact of other relevant international agreements

The IATTC should strengthen cooperation and coordination with the World Trade Organization's Agreement on Fisheries Subsidies and the United Nation's Biodiversity Beyond National Jurisdiction (BBNJ) Agreement. **The IATTC should proactively consider how the WTO subsidies and BBNJ agreements may influence its future work.** With respect to the WTO Agreement, RFMOs can help ensure Members are providing up to date information on IUU fishing and the status of stocks under the RFMO's purview, helping to ensure transparency and accountability under the Agreement. With respect to the BBNJ Agreement, IATTC should establish regular opportunities for Member discussion on BBNJ-related topics, including through a standing agenda item and an ad hoc working group ([Proposal S-1](#)). These mechanisms support a clear two-way flow of information between IATTC and the BBNJ institutions ensuring that relevant developments under the BBNJ Agreement can be communicated to the Commission and that IATTC can provide input, expertise, and direction where appropriate. They would also provide a forum for Members to guide the Secretariat and Scientific Staff; consider whether updates to existing practices, procedures, or institutional arrangements may be needed; and discuss opportunities to strengthen scientific cooperation, information exchange, and appropriate data-sharing as BBNJ implementation evolves. This will be particularly important for developing practical approaches to future engagement on area-based management tool proposals, environmental impact assessments, and requests for scientific or technical input.