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The Pew Charitable Trusts' Statement to the 100th Meeting of the Inter-American Tropical Tuna Commission August 2022

The Pew Charitable Trusts welcomes the opportunity to participate in the 100th Meeting of the Inter-American Tropical Tuna Commission. We appreciate the work of the Secretariat, Chair, and members to convene this meeting under the continuing difficult circumstances related to the COVID-19 pandemic.

With last year's adoption of a multi-year tropical tuna measure and this year's ability to have full working days, there will be time to address several pieces of important IATTC business, and this is evident in the number of proposals that have already been submitted by members. In particular, we encourage the Commission to adopt new management measures to increase oversight of transshipment activity in the IATTC Convention Area, adopt a full harvest strategy for north Pacific albacore, and continue to improve IATTC's compliance process, among other actions that would help to modernize the Commission's management and improve enforcement within these valuable fisheries.

1. Adopt the [proposal](#) from the European Union to update Resolution C-12-07 and reform transshipment management in the IATTC Convention Area.

We recognize the utility of transshipment to fleets fishing in the eastern Pacific Ocean, particularly for high seas longline vessels, but the remote nature of this activity makes it difficult for CPCs to monitor. Transshipment creates a transfer point, far from regulators, where IUU catch could be merged with legal catch. Recognizing these concerns, ICCAT and IOTC have acted at their recent Commission meetings to improve transshipment oversight, close reporting loopholes, and reduce the likelihood of noncompliance with their management measures. The EU proposal would extend these updates to the IATTC and the eastern Pacific Ocean, and importantly is in line with the newly adopted FAO transshipment guidelines. The proposal should be supported by all CPCs and adopted by the Commission. Extending best practices in transshipment management across RFMOs provides consistency for participating fleets and will reduce the likelihood of future attempts to suspend or ban at-sea transshipment.

2. Adopt a fully specified harvest strategy for north Pacific albacore based on the completed management strategy evaluation and including a well-defined harvest control rule.

IATTC has committed to shift more of its stock management to the harvest strategy approach, where management objectives help scientists and managers to define reference points and pre-agreed harvest control rules (HCRs) that set total allowable catch and/or effort for IATTC fisheries. Based on several years of dialogue, scientists have completed their testing of a range of candidate harvest strategies for north Pacific albacore, and IATTC should choose and adopt one this year. There is a [proposal](#) from Canada that goes a long way toward implementing a harvest strategy, but it unfortunately stops short of defining a pre-agreed HCR that will take effect when reference points are breached. With minimal effort, IATTC CPCs could add this remaining element to the proposal and complete the job this year, securing IATTC's first-ever comprehensive harvest strategy based on management strategy evaluation. That would simply require managers to define a minimum fishing intensity that is implemented if the limit

reference point is breached, which could then be combined with the reference points and figure in the proposal to add an equation that defines the HCR setting the fishing intensity between the threshold and limit reference points. With this addition, the Commission should support and adopt the proposal, and we are hopeful that steps taken here will shape the actions taken at WCPFC later this year.

3. Build on recent advances to improve IATTC's compliance process and ensure that CPCs are compliant with the resolutions that IATTC adopts.

IATTC has recently taken steps forward in its effort to improve compliance and implementation of its measures, with important discussions having taken place during the successful compliance workshop in June of this year. The [proposal](#) from the European Union to amend Resolution C-11-07 would codify some of these discussions into a formal resolution, and we urge CPCs to support and adopt it. As alluded to in Annex 2 of that proposal, we encourage IATTC to initiate a process to help grade the severity of different types of infractions, something that would align with efforts currently being undertaken in other tuna RFMOs, such as WCPFC and ICCAT. This would greatly help to ensure that limited time and resources are directed to the most pressing issues. We also urge CPCs to read and consider the newly drafted RFMO compliance recommendations submitted by Pew and ISSF. These recommendations, developed by recognized experts working directly in this area including RFMO compliance committee chairs, were drawn from the outcomes of a series of three Pew/ISSF-hosted expert workshops, held over 2020 – 2021. These workshops, conducted under Chatham House Rule, closely examined the major challenges experienced within RFMO compliance review mechanisms and raised potential solutions. These recommendations provide a rich menu of options to help guide the work needed to improve IATTCs compliance review procedures, and we offer our support in any such endeavors.

In addition to the above items, Pew encourages CPCs to adopt the proposals on [south Pacific albacore](#), [sharks](#), and the [vessel register](#), and to increase observer coverage on longline vessels to at least 20%. The Commission should also formally establish a working group to develop an electronic monitoring program for IATTC fisheries based on the recommendation of the EM workshops and the Scientific Advisory Committee and in line with recent actions at the other tuna RFMOs.

Finally, we are encouraged to see that some CPCs have already designated ports to opt-in to the minimum standards for port inspection measure, adopted last year. We recognize the special requirements for developing CPCs and hope that the outputs of the assessment questionnaire, on the capability of developing States to implement the measure will be used to target assistance, so all remaining CPCs can opt-in as soon as possible. This will help ensure that ports are not an avenue for illegal product to enter the seafood supply chain.