

A 2021 Review of the Transshipment Practices within the Inter-American Tropical Tuna Convention Area

The Pew Charitable Trusts

A Review of Transshipment Management and Reporting within the IATTC Convention Area

Transshipment, the transfer of fish or other marine wildlife between a fishing vessel and a carrier vessel at sea or in port, is an important part of the global commercial fishing industry. However, despite existing regulations to minimize illegal, unreported, and unregulated (IUU) fishing, there are loopholes that allow vessels to avoid proper catch reporting and launder illegally caught fish via at-sea transshipment operations. Consequently, the Inter-American Tropical Tuna Commission (IATTC) transshipment measure ([Resolution C-12-07](#)) preamble states that there is “grave concern that organized tuna-laundering operations have been conducted, and a significant amount of catches by IUU tuna longline fishing vessels have been transshipped under the names of duly licensed fishing vessels...”¹ At the 2021 IATTC meeting, members have an opportunity to strengthen this measure and close loopholes that may be avenues for laundering IUU fish.

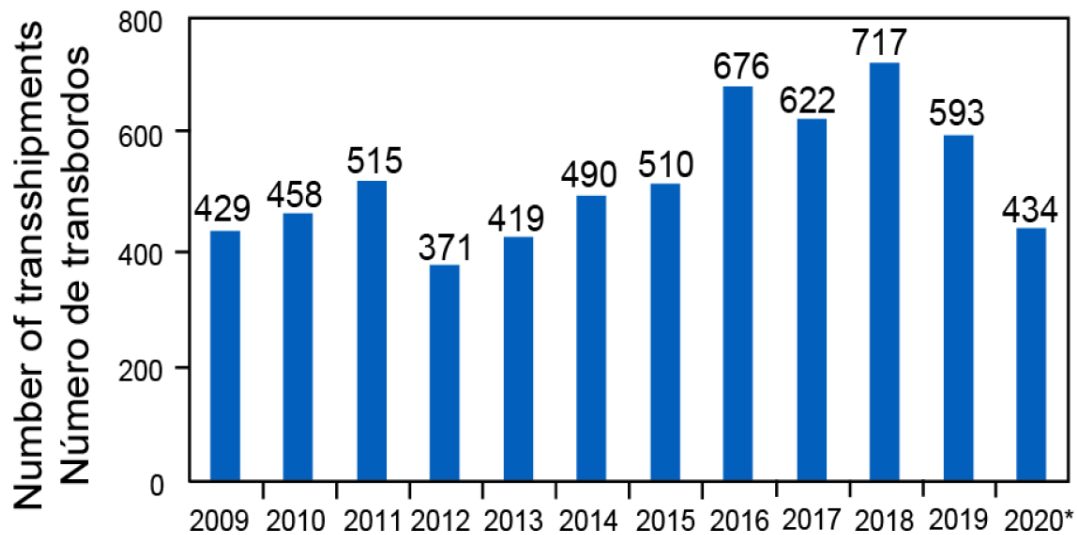
[Resolution C-12-07](#) bans at-sea transshipments with the exception of those between large-scale tuna longline fishing vessels (LSTLFVs) and authorized carrier vessels. However, as of July 7th, 2021, there were a total of 1,125 authorized LSTLFVs listed in the IATTC database that may be eligible to transship at sea.² The high number of vessels falling under the exception means that, without proper monitoring and enforcement, there is a high risk that illegally caught fish could be transferred without detection. Recognizing the need to improve monitoring and reporting of transshipment activities, multiple proposals have been put forth by IATTC members^{3,4}, but they have not been adopted by the Commission.

In recent years, discussions on the tropical tuna measure have dominated the annual Commission meetings, with very little time available to discuss other issues that are critical for effective management within the eastern Pacific Ocean, like strengthening the transshipment measure. This year, the Commission can take leadership on this issue and demonstrate its ability to make progress. This brief assesses the current IATTC transshipment resolution, highlights areas that undermine its effectiveness, and recommends practical changes that will establish a more comprehensive Resolution. It also includes a discussion of potential high seas transshipments in the IATTC and Western and Central Pacific Fisheries Commission (WCPFC) overlap area, which have been detected using automatic identification systems (AIS).

1. High Seas Transshipment Within the IATTC Convention Area

Since 2009, when the Regional Observer Program (ROP) was first implemented, the number of reported transshipments has fluctuated. Seven-hundred seventeen transshipments were recorded in 2018, the highest on record, followed by a drop to 593 in 2019 (Figure 1).⁵

Figure 1: Number of Transshipments at sea in the EPO.



*As of October 30th, 2020

In 2019, albacore tuna was the most transshipped species (43%), followed by bigeye tuna (24%).⁶ Longline caught bigeye tunas are often used for fresh or frozen sashimi and therefore command higher prices per metric ton. In 2018 alone, the end value of EPO bigeye tuna, or the total amount paid by the final consumer, was US\$790 million.⁷ While transshipments enable the efficient movement of these fish to maintain freshness and obtain higher market prices, this value can also create economic incentives for misreporting as another means to increase profits.

Given the high value of tunas transshipped within its Convention Area, the IATTC should evaluate the following loopholes and recommendations to increase monitoring and allow authorities to better track and audit data on transshipped catch.

2. Recommended Amendments to the IATTC transshipment Resolution: C-12-07

- The Resolution's notification obligations enable LSTLFVs to delay transmission of the IATTC transshipment declaration to its flag State by up to 15 days. Considering that the transshipment declaration form only requires basic information from an observed transshipment event and can be transmitted electronically, it is unclear why there is an extended period for submission. Transshipment declarations should be sent to all relevant authorities (flag, coastal, and port State authorities, and the IATTC Secretariat) upon completion of the transshipment. This will limit any opportunity to alter recorded information and allow for prompt verification of data. In addition, upon entry into the IATTC Convention Area, carriers should be required to notify IATTC of their intent to transship and confirm the presence of an observer and an operational vessel monitoring system (VMS) on board.
- Paragraph 20 states that *"[a]ll tuna and tuna-like species and sharks landed in, or imported into, the territory or area of a CPC, either unprocessed or after having been processed on board and which are transshipped, shall be accompanied by the IATTC transshipment declaration until the first sale has taken place."* This inadvertently allows for transshipping and/or importing IATTC-caught species in the port of a nonmember country without documentation. This language should be revised to require that all transshipped products sourced from IATTC waters be accompanied by transshipment declarations until the first point of sale, regardless of the territory or area of landing. Members should be encouraged to land at CPC ports and, in instances where that is not possible, information exchange practices should be implemented between IATTC CPCs and non-CPC port States.
- The current IATTC transshipment declaration form does not include a field for International Maritime Organization (IMO) numbers, which is inconsistent with international standards and could hamper cross-referencing between the record of fishing vessels and the authorized list of carrier vessels. Additionally, these forms only require observer signature if transshipment occurred at sea. To meet international standards and improve reporting consistency, IATTC should revise the transshipment declaration to require the inclusion of IMO numbers for all eligible vessels and to have data fields clearly outlining transshipment geocoordinates. This recommendation will also align transshipment reporting with Resolution [C-18-06](#), the vessel register measure that requires IMO numbers.
- The IATTC Secretariat's report and the ROP report document quantities of tuna species transshipped but do not include the quantities of shark species transshipped. This is despite paragraph 19 of the Resolution that requires each CPC to report annually *"[t]he quantities by species transshipped during*

the previous year....” Shark species data is needed for accurate estimates of species-specific catches and robust stock assessments. Taking heed of the Scientific Advisory Committee advice⁸, a column should be added to the declaration form to record species of transshipped sharks. Identification guides are available for most of the sharks caught within the Convention Area. The measure should also ensure that all bycatch is recorded in the transshipment declaration.

- IATTC only requires 5% observer coverage for longline vessels, a requirement that has poor compliance and is rarely reported on. Despite multiple proposals at previous annual meetings and recommendations from the scientific committee to increase observer coverage, there has been no movement. This low observer coverage presents an oversight challenge especially if at sea transshipments occur between longline vessels. The transshipment measure should be revised to explicitly prohibit fishing or longline vessels from acting as receiving vessels at sea. Additionally, these loopholes further highlight the need for IATTC to increase observer coverage on longline vessels and improve compliance to ensure that transshipped catch can be tracked to legal sources.
- The lack of onboard observers on longline vessels is compounded by the absence of catch location and time data on the transshipment declaration form; meaning there is no direct way to verify the link between transshipped products and logbooks. Without information from this initial point of the supply chain, vessels may be able to mix legal and illegally caught fish during transshipments. Additionally, IATTC has not adopted any port State measures, which is a concerning lack of progress when compared with the Food and Agricultural Organization of the United Nations (FAO) Agreement on Port State Measures (PSMA) and the measures of other tuna regional fishery management organizations (RFMOs), so vessels entering port with catch on board which has not yet been landed (but may have been transshipped), do not receive the necessary level of risk assessment or oversight.

IATTC should require catch location and time data along with the transshipment declaration form and provide a publicly available list of fishing vessels authorized to transship. In addition, IATTC should also consider employing a centralized VMS to improve technical capabilities and vessel verification processes. The centralized VMS employed by neighboring RFMOs such as WCPFC, has eliminated redundant satellite transmissions by providing the same data automatically, securely and in near real time to relevant CPCs and the Secretariat. Finally, IATTC should adopt port State measures in line with international best practices to ensure proper oversight and reporting of all catch arriving in port, including any that was transshipped.

3. Noncompliance with Reporting Requirements

The authorized carrier vessel list (Table 1) has increased 27% since 2019, largely due to Panama doubling its number of vessels, which now make up more than 53% of authorized carrier vessels in 2021.⁹

However, Panama did not submit annual transshipment reports for 2016, 2018, or 2019 to the Secretariat as required under paragraph 19 of Resolution C-12-07.⁵ These reports are critical to assess responses to observer reports and infractions. The growing trend of carrier vessels flagged to Panama is also concerning as recent reports have shown that some flags of convenience can be driven by opaque ownership structures, favorable tax arrangements, and minimal compliance requirements.¹⁰

Table 1: List of Carrier Vessels authorized to receive at-sea transshipments from LSTLFVs – June 2021¹¹

Flag	Panama	Liberia	China	Korea	Japan	Chinese Taipei	EU	Vanuatu	Total
Number	49	14	12	7	4	4	1	1	92

These missing reports create a blind spot for the Commission staff by inhibiting their ability to verify transshipment reporting. IATTC should regularly evaluate each CPC's compliance with the current transshipment Resolution and their ability to effectively monitor flagged vessels. Clear processes must be put in place to address noncompliance by countries that do not submit required annual transshipment reports.

4. Overlap Area – A Hub for Transshipment Activity

Figure 2 shows the overlap in Convention Area waters between IATTC and WCPFC – an area with notably high transshipment activity. The 2019 WCPFC Annual Report on Transshipment noted that *“high seas transshipment events were reported to have occurred more often in the tropical eastern Pacific, particularly within and around the overlap area with IATTC.”*¹² In 2019, IATTC reported that 55% of the transshipped tuna was caught in the EPO, including the overlap area, and 43% in the Western Pacific Ocean.¹³ The overlapping jurisdictions and separate measures in place in these dual-managed areas makes it difficult to determine if vessels are complying with all applicable regulations.

In recent years, AIS data has consistently found a high concentration of carrier vessel activity in the IATTC/WCPFC overlap area, yet it is unclear which RFMO regulations these carrier vessels were operating under. Based on [analysis of AIS data by Global Fishing Watch and The Pew Charitable Trusts](#), IATTC, along with many other tuna RFMOs, saw a decrease in observed activity by carrier vessels in 2019 compared to 2018. However, the IATTC-WCPFC overlap area continued to be a hub for transshipment

activity, suggesting the reduction in transshipment activity likely occurred almost entirely outside the overlap area.

Figure 2 - WCPFC and IATTC Convention Areas Overlap Across the Pacific¹⁴



In addition, MRAG, the current carrier observer provider for IATTC, does not have an agreement with WCPFC for an embarked IATTC observer to collect and report data on transshipments that occur in the Western Pacific; hence, if a carrier vessel transships west of the 150W line, the IATTC observer onboard is only able to observe transshipments “...at [the] carrier vessel captain’s discretion.”¹² Therefore, the captain has the authority to prevent an IATTC observer from recording/reporting a transshipment event in this area. IATTC observer reports also do not record whether carrier vessels that move from IATTC waters to WCPFC waters to conduct high-seas transshipments have a WCPFC observer onboard to record these transshipments. As such, these transshipments may go wholly unobserved and unreported. For the few carrier vessels who try to meet both RFMO requirements, this has meant having two observers on board, which not only increases operational costs but also causes logistical delays.

Recognizing the need for better information-sharing protocols between IATTC and WCPFC and a harmonized approach toward managing the overlap area, **The Pew Charitable Trusts proposes to convene a workshop between representatives of the WCPFC and IATTC and their observer program coordinators to explore ways to increase cooperation between the two carrier observer programs,** including the potential for cross-certification of carrier observers. The workshop will provide a platform to begin these discussions.

Conclusion

Transshipment continues to be an important activity for large scale fisheries and while many fleets follow the current control measures, there are still others who may exploit loopholes to introduce IUU caught fish into the supply chain. Pew urges IATTC members to adhere to the recommendations listed above to improve transshipment management within the eastern Pacific Ocean. These recommendations do not add major operational burdens to vessels and will address gaps in monitoring and management of this important activity. Pew also emphasizes its proposal to host a workshop between IATTC and WCPFC observer coordinators to begin discussions on potential avenues to harmonize management of the overlap area.

Endnotes

¹ Resolution C-12-07 Amendment to Resolution C-11-09 on Establishing a Program for Transshipments by Large-Scale Fishing Vessels.

https://www.iattc.org/PDFFiles/Resolutions/IATTC/_English/C-12-07-Active_Amends%20and%20replaces%20C-11-09%20Transshipments.pdf.

² IATTC Vessel Database. Authorized large longline. Accessed 6/30/2021.

<https://www.iattc.org/VesselRegister/VesselList.aspx?List=Longline&Lang=ENG>.

³ Proposal IATTC-94 G-1B. Submitted by the European Union: Amendments to Resolution C-11-09 to Strengthen Transshipments.

https://www.iattc.org/Meetings/Meetings2019/IATTC-94/Prop/_English/IATTC-94-PROP-G-1B_EUR%20Transshipments.pdf.

⁴ Proposal IATTC-95 D-1. Submitted by Ecuador: Resolution on Establishing a Mandatory Program for Transshipments in Authorized Ports by Large-Scale Fishing Vessels in Replacement of Resolution C-12-07 [https://www.iattc.org/Meetings/Meetings2020/IATTC-95/Proposals/ English/IATTC-95-PROP-D-1_ECU%20Transshipments%20\(changes\).pdf](https://www.iattc.org/Meetings/Meetings2020/IATTC-95/Proposals/ English/IATTC-95-PROP-D-1_ECU%20Transshipments%20(changes).pdf).

⁵ Implementation of the IATTC Regional Observer Program for transshipments at sea. Document IATTC 95-07 CORR., https://www.iattc.org/Meetings/Meetings2020/IATTC-95/Docs/ English/IATTC-95-07-CORR-02-Dec-20_Regional%20Observer%20Program%20for%20transshipments%20at%20sea.pdf.

⁶ IBID

⁷ R. McKinney et al., “Netting Billions 2020: A Global Tuna Valuation,” The Pew Charitable Trusts, (2020): 5-15, <https://www.pewtrusts.org/en/research-and-analysis/reports/2020/10/netting-billions-2020-a-global-tuna-valuation>.

⁸ Staff Recommendations for Management and Data Collection, 2019 and 2021. <https://www.iattc.org/Meetings/Meetings2019/SAC-10/10th-Meeting-Scientific-Advisory-CommitteeENG.htm>; <https://www.iattc.org/Meetings/Meetings2019/SAC-10/BYC-09/Docs/ English/BYC-09 %20Recommendations%20of%20the%209th%20Meeting%20of%20the%20Working%20Group%20on%20Bycatch.pdf>.

⁹ A Review of the Transshipment Practices within the Inter-American Tropical Tuna Convention Area https://www.iattc.org/Meetings/Meetings2019/IATTC-94/OtherDocs/ Spanish/IATTC-94-OTR_The%20PEW%20Charitable%20Trusts-Una%20revisi3n%20de%20las%20practicas%20de%20transbordo%20de%20la%20CIAT-ENO.pdf

¹⁰ ICCAT Transshipment Business Ecosystem Study. September 2020. <https://www.m2cms.com.au/uploaded/5/Pew%20ICCAT%20Transshipment%20Report%20-%20final.pdf>

¹¹ List of carrier vessels authorized to receive tuna and tuna-like species at sea from large-scale tuna longline fishing vessels (LSTFVs). June 2021. <https://www.iattc.org/PDFFiles/VesselDatabase/VesselList/ English/List-of-authorized-carrier-vessels.pdf>

¹² Annual Report on WCPFC transshipment reporting prepared by the WCPFC Secretariat. WCPFC-TCC15-2019-RP03. 2019. <https://www.wcpfc.int/doc/wcpfc-tcc15-2019-rp03/annual-report-wcpfc-transshipment-reporting-secretariat>.

¹³ Implementation of the IATTC Regional Observer Program for transshipments at sea. Document IATTC 95-07 CORR., https://www.iattc.org/Meetings/Meetings2020/IATTC-95/Docs/ English/IATTC-95-07-CORR-02-Dec-20_Regional%20Observer%20Program%20for%20transshipments%20at%20sea.pdf.

¹⁴ WCPFC and IATTC, via United Nations Food and Agriculture Organization (FAO) <http://www.fao.org/geonetwork/srv/en/main.home>; Land and Bathymetry from Natural Earth <https://www.naturalearthdata.com/about/terms-of-use/>.