



Call for the IATTC to support stronger transparency and anti-IUU measures

August 2025

The Environmental Justice Foundation (EJF), Oceana, The Pew Charitable Trusts and WWF are working together in a coalition of non-governmental organisations to ensure that the EU's engagement with Regional Fisheries Management Organisations (RFMOs) and key partners leads to strong transparency and anti-illegal, unreported and unregulated (IUU) fishing measures worldwide.

In a coalition report titled "[Achieving transparency and combating IUU fishing in RFMOs](#)"¹, we outline the minimum transparency and anti-IUU fishing measures that we consider essential for RFMO Contracting Parties, Cooperating non-Contracting Parties (CPCs) and fishing entities to adopt and implement in order to end IUU fishing. The report's annexes are updated annually to reflect the progress achieved in RFMOs in adopting these key measures.

This document details vital measures for discussion and adoption at the 102nd meeting of the Inter-American Tropical Tuna Commission (IATTC).

To promote transparency and tackle IUU fishing, we ask IATTC Parties to prioritise the following actions:

- 1. Adopt a new measure to improve traceability through an electronic Catch Documentation Scheme**
Regional fisheries bodies need to deliver effective enforcement mechanisms and create a culture of compliance with fishing regulations among their CPCs. One of the most effective mechanisms for monitoring catches, verifying their legality and preventing IUU fishing, is the adoption of electronic Catch Documentation Schemes (CDS). Although a CDS may not prevent all forms of IUU fishing, it can complement other monitoring, control and enforcement efforts, and significantly improve traceability along the value chain. The key role of CDS has been highlighted in the FAO Committee on Fisheries, including in the most recent one in September 2022.²
Other regional fisheries bodies, such as CCAMLR, CCSBT and ICCAT, have successfully deployed such schemes for years.

The EU IUU Fishing Coalition welcomes the ongoing inter-sessional work, including the work at the IATTC-WCPFC Joint Working Group on CDS for Pacific bluefin, and is particularly encouraged by Resolution C-24-03 on establishing a CDS for Pacific bluefin tuna compatible with other CDSs for Pacific bluefin tuna by 31 December 2026. We encourage CPCs to accelerate deliberations with the aim of introducing a draft proposal in line with the FAO Voluntary Guidelines for Catch Documentation Schemes and established best practice in other RFMOs, by the 2026 annual meeting. A phased approach should have the proposed scheme covering the most at-risk stocks from the outset (i.e.

¹ <http://www.iuuwatch.eu/2019/06/new-report-achieving-transparency-and-combating-iuu-fishing-in-rfmos/>

² <https://www.fao.org/3/nk497en/nk497en.pdf>

bigeye, pacific bluefin, swordfish and north Pacific striped marlin). The Coalition stands ready to contribute and support the discussions.

This year there is a clear opportunity to advance CDS in bluefin tuna fisheries in the Eastern Pacific Ocean to ensure the increase in bluefin catches are properly monitored. The EU IUU Coalition urges CPCs to support the EU's recommendations for increased MCS measures, beginning with CDS.

2. Adopt measure to improve transparency over who engages and benefits from IUU fishing

RFMOs must adopt measures that require their contracting parties to verify and take appropriate measures if any of their nationals, whether a natural or legal person subject to their jurisdiction, are responsible for, benefiting from, supporting or engaging in IUU fishing activities. Other regional fisheries bodies, including CCAMLR, GFCM, ICCAT, SIOFA, SPRFMO, and most recently IOTC, have adopted or strengthened measures that promote compliance by nationals. Furthermore, more transparency is needed on beneficial ownership, that is the person or entity who profits most from the vessel's activities. Collecting this data would help ensure that fishery managers know who is fishing within the Convention Area and benefits from its resources, and empower them to take appropriate and prompt action, particularly in cases of IUU fishing.

The EU IUU Fishing Coalition urges IATTC to amend its vessel registry (C-24-07) in order to collect the beneficial owner's name and adopt a Resolution that explicitly requires the CPCs to verify and take appropriate action when nationals are found to be engaged in and responsible for IUU activities or otherwise benefiting from or supporting such activities and/or vessels (e.g. as operators, effective beneficiaries, owners, logistics and service providers, including insurance providers and other financial service providers).

3. Amend Resolution C-14-02 to further strengthen vessel monitoring

Vessel monitoring systems (VMS) are crucial for RFMOs and a vital requirement with respect to monitoring, control and surveillance of fishing and fishing-related activities. Current RFMO practices vary with different levels of accuracy, reporting and polling requirements and frequencies, sharing protocols and implementation rates. These diverging modalities can create gaps, inefficiencies and difficulties for cross-jurisdiction operators, allowing IUU vessels to slip through the net.

The EU IUU Fishing Coalition calls on IATTC to align its vessel monitoring requirements with the best practice of other RFMOs, including ICCAT, NAFO, NEAFC and NPFC, by increasing polling rate to hourly, introducing provisions on manual reporting in case of malfunction and sharing positioning and vessel id data with coastal state or the Secretariat when deemed necessary, including for enforcement or inspection purposes.

4. Adopt a high seas boarding and inspection scheme

Duly established high seas boarding and inspection (HSBI) procedures, as called for in articles 21 and 23 of the UN Fish Stocks Agreement and in FAOs International Plan Of Action to Prevent, Deter and Eliminate IUU Fishing (IPOA-IUU), are crucial to ensure compliance with conservation and management measures. CCAMLR and other RFMOs, for example NAFO, WCPFC, SIOFA, SPRFMO and more recently SIOFA, have adopted such schemes to ensure effective, transparent, and consistent high

seas boardings and inspections in their respective convention areas. Others, like ICCAT, have initiated discussions on introducing one.

The EU IUU Fishing Coalition calls on all CPCs to engage in the discussions over the establishment of an HSBI scheme, and agree and adopt a resolution that takes into account best practices by other RFMOs. To support these efforts, we have published a white paper on high seas boarding and inspection schemes which also includes an indicative step by step guide on how HSBI schemes work.

5. Improve labour standards for crew on fishing vessels in line with international conventions

As acknowledged by the member States of the International Maritime Organization (IMO), the International Labour Organization (ILO), and the FAO during the 4th FAO/ILO/IMO Joint Working Group meeting on IUU Fishing and other related matters in Torremolinos, Spain, on 23-25 October 2019, vessels with substandard safety and working conditions for fishers and observers are frequently linked to IUU fishing activities.

A recent study by the FISH Safety Foundation has found that more than 100.000 fishing-related deaths occur each year.³ Widespread implementation of relevant minimum international standards and full reporting of safety and labour-related incidents will allow for the identification and potential mitigation of dangerous situations and indirectly help to reduce IUU fishing activity. Other RFMOs have work streams on labour and safety standards and have also established working groups, including ICCAT in 2021, “acknowledging that unfair and abusive labour practices and unsafe working conditions are dire problems in international fisheries.”

The EU IUU Fishing Coalition calls on IATTC parties to adopt a resolution on crew safety, wellbeing and labour standards in the 2024 annual meeting and to establish a working group charged with establishing relevant recommendations based on relevant international labour conventions, including the ILO Work in Fishing Convention (C188) and the 2012 IMO Cape Town Agreement on fishing vessel safety. Safe and decent working and living conditions for all fishers and fisheries observers on board vessels flying their flag and operating within the Convention Area must be ensured.

6. Strengthen the compliance process and improve transparency

Transparency is a particularly important but often overlooked aspect of RFMOs’ compliance review processes. Granting public access to information about those who violate rules and jeopardize the health of fisheries is vitally important in ensuring that RFMOs are accountable to all stakeholders with interests in the shared public resources under their management. The more accountable and transparent an RFMO, the more likely it is to make decisions that favour the long-term sustainability of fish stocks.

The EU IUU Fishing Coalition acknowledges the recent positive development with the adoption of Resolution C-22-02 and the introduction of status categories and suggested actions in response to non-compliance (Annex 2) – additions that will improve compliance reporting within the RFMO. The Coalition calls on IATTC to further continue efforts to strengthen the compliance process by publishing the compliance reports annually as per best practice by most RFMOs, addressing the significant existing backlog and introducing a ranking system to assess the severity of non-compliance cases.

³ S. Willis and E. Holliday, “Triggering Death: Quantifying the True Human Cost of Global Fishing” (FISH Safety Foundation, 2022), <https://the-human-cost-of-fishing.org>

Compliance mechanisms must be strengthened to ensure processes are transparent and robust so that members are held accountable for the implementation of all conservation management measures and data reporting requirements and there are clear consequences for non-compliance. In this context, it has been agreed in section 2b of the Resolution C-22-02 to convene an intersessional committee meeting, biennially, specifically to improve the compliance review process.

The EU IUU Coalition calls upon the IATTC to use the biennial compliance meeting scheduled this year to develop a workplan to improve the IATTC compliance process based on the above made recommendations.

7. Further strengthen the Resolution C-21-07 on Port State Measures

Adopting effective port State measures minimises the risk of illegally caught fish entering international markets. The United Nations Food and Agriculture Organization's Agreement on Port State Measures (PSMA) is the only binding international agreement that specifically targets illegal, unreported and unregulated (IUU) fishing and is the most cost-effective means to ensure the sustainability of fisheries through the enforcement of rules and regulations at port.

While acknowledging the progress made with the adoption of the Resolution C-21-07 (PSMs), more needs to be done to better align it with the PSMA and bridge several gaps in its effective implementation.

The EU IUU Fishing Coalition calls for all IATTC parties to opt-in to the minimum standards for port inspection as per Resolution C-21-07 by designating ports. We recognise the special requirements for developing CPCs and urge parties to ensure the assistance fund is sufficiently resourced and ready to disperse to support implementation from 2024. We encourage developing States to submit an action plan as required to identify areas for targeted assistance to ensure all remaining CPCs can opt into the measure as soon as possible.

Furthermore, the EU IUU Fishing Coalition calls for IATTC to align the Resolution with the PSMA, introduce more detailed provisions on national coordination, information exchange (including through the use of a dedicated platform of FAO's Global Information Exchange System), use of ports, training and recourse of information to maximise the effectiveness of the Resolution.

Finally, we call for IATTC Parties to work together in making the PSMs binding in the near future. This will ensure that ports are not an avenue for illegal products to enter the seafood supply chain.

High Seas Boarding and Inspection Schemes



© Juan Cuetos | Oceana

Introduction

Regional fisheries management organisations (RFMOs) are responsible for overseeing many commercial fisheries in more than 95% of the world's ocean. Managers must be able to track data on catch and vessel activity to ensure that fishing is sustainable and compliant with applicable rules. But such monitoring is difficult when vessels operate far from shore, beyond the jurisdiction of national authorities. High Seas Boarding and Inspection (HSBI) schemes play a critical role in ensuring effective enforcement of RFMO measures, promoting a level playing field for all those operating on the high seas, and reducing threats to sustainability.

Because of the nature of boarding on the high seas, there is a risk that only certain countries may have the platforms to deliver these inspections, and it is thus important that such schemes are collectively discussed, designed, agreed, and deployed through a formalised procedure rather than on an ad hoc basis.

The first section of this brief provides an introduction to HSBI schemes also in relation to international law and summarises key benefits of such schemes. The second section, building upon the precedents and best practices set by other RFMOs, presents an indicative step-by-step guide on how HSBI schemes work.

Benefits of RFMO HSBI schemes

1. Enhanced compliance: Enabling and facilitating the deployment of authorised inspectors to board and inspect vessels on the high seas, these schemes enhance monitoring and enforcement, helping to ensure that fishing activities adhere to agreed-upon rules. They provide an effective mechanism and platform for real-time monitoring of fishing activities. This deters IUU fishing, promotes accountability, encourages transparency, and fosters cooperation among CPCs, decisively contributing to the long-term goals of the RFMO.

2. Inclusively designed tailored framework: By jointly setting the rules, operational guidelines and capacity-building opportunities, RFMO HSBI schemes can be specifically designed for the Convention Area and the RFMO's needs. This way, they can focus on addressing the unique challenges and requirements of the region and the specific relevant measures agreed to at the RFMOs.

3. Pooling of resources: This enhances the optimal use of what are often scarce and expensive resources, enabling more effective enforcement and deployments, particularly for States who currently lack the technical means to undertake such operations in the high seas. This leads to a broader coverage of the Convention area, accurate data collection, and increased compliance with conservation and management measures.

4. Strengthened cooperation: RFMO HSBI schemes can build cooperative procedures among members, including the placement of authorised inspectors on vessels from other member States through shiprider¹ agreements. This brings a precious added value to States who might currently have more limited means by allowing them to project their enforcement jurisdiction much further and in a cost-effective manner.

5. Comprehensive training: The scheme can include detailed provisions for the training and designation of authorised inspectors, ensuring that inspections are conducted by well-trained personnel and in accordance with jointly agreed standards. These trainings should be inclusive by design, ensuring that they are made available to and facilitate the participation of interested CPCs, particularly those of need of capacity development.

6. Clearer guidelines: RFMO HSBI measures can provide more specific, detailed and jointly agreed guidelines for boarding and inspection activities, reducing ambiguities and ensuring consistent application across the Convention Area.

7. Regular updates: RFMO HSBI schemes can be subject to regular review and updates, allowing them to adapt to emerging challenges and incorporate best practices. This ensures that the boarding and inspection regime remains effective, relevant and tailored to the evolving needs of the CPCs.

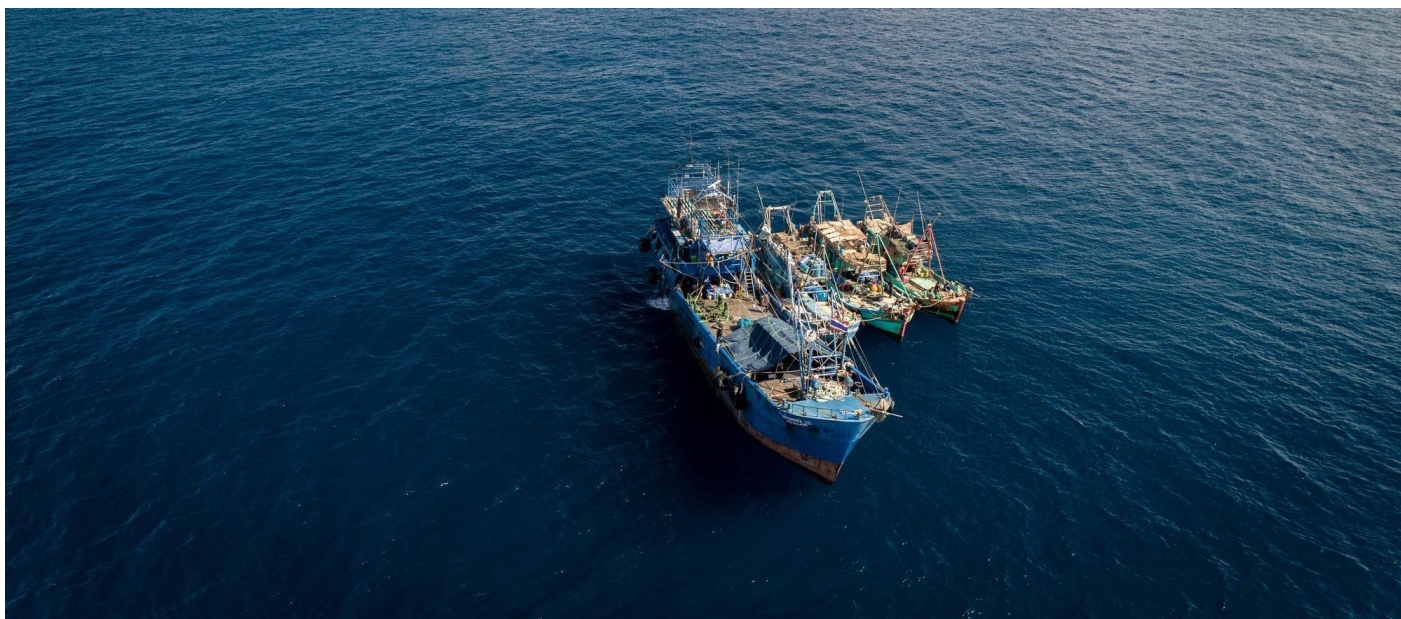
Compatibility with international law and other instruments

1. HSBI is codified in international law including within the UN Convention on the Law of the Sea (UNCLOS) and the UN Fish Stocks Agreement (FSA). The latter explicitly directs in Article 21 that “*States shall establish, through RFMOs, procedures for boarding and inspection*” in any high seas area covered by an RFMO.

2. Notably, in the absence of a regional boarding and inspection scheme, Parties to the UN Fish Stocks Agreement are authorised under Article 21 to conduct boarding and inspection operations in the high seas on vessels whether or not such State Party is also a member of the RFMO in question or a participant in the HSBI arrangement, provided the State Party is a signatory to the UNFSA. In other words, in RFMOs without an established HSBI scheme, CPCs are allowed by international law to conduct such operations on their own, as a last resort after all efforts to establish a scheme have been exhausted. But such actions shall be limited to other Parties to the UNFSA.

3. More recent instruments, such as the FAO International Plan of Action to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing (IPOA-IUU), provide that States should cooperate in monitoring, control and surveillance, including through international agreements and calls on CPCs to develop boarding and inspection regimes to apply in RFMO convention areas.

1. An agreement where a maritime law enforcement official of one Party is authorised to embark (“ride”) on a law enforcement vessel of another Party in order to facilitate the first Party to enforce its laws within its waters and/or onboard its flagged vessels.



4. Similarly, the FAO Compliance Agreement calls for Parties to enter into cooperative agreements or arrangements, including at regional level, to promote the objectives of the Agreement.

5. Restrictions on the use of force

- The within-strict-limitations use of force is a standard operating procedure in boarding and inspection schemes and a legal obligation for the protection of inspectors, when needed. As such, most RFMOs include relevant provisions in their HSBI schemes.
- The UN FSA in Article 22 on the Basic Procedure for Boarding and Inspection specifies in paragraph (f) that [The inspecting State shall ensure that its duly authorised inspectors] “avoid the use of force except when and to the degree necessary to ensure the safety of the inspectors and where the inspectors are obstructed in the execution of their duties. The degree of force used shall not exceed that reasonably required in the circumstances.”
- The language in the proposed HSBI

resolution is taken directly from the FAO FSA. Identical text is also found in WCPFC, SIOFA and NPFC.

- In practice, these clauses are rarely invoked and, when they are, it is usually post-boarding and defensive in nature, to ensure the health and safety of already-boarded inspectors when facing highly aggressive situations. Some RFMOs mandate immediate reporting of such instances, when they occur.
- The above is highlighted in the HSBI measures of several RFMOs. As an example, SPRFMO mandates that “Only when the personal safety of the Authorised Inspectors whose authorisation has been duly verified is endangered or their normal inspecting activities are obstructed by the threat of violence by masters or crew members of the fishing vessel under inspection, may the inspectors take appropriate compulsory measures necessary to stop such threat of violence. Any force by the Authorised Inspectors will be only the force necessary to stop the threat of violence that was raised.”

Existing HSBI schemes in other RFMOs

HSBI schemes are not new in the RFMO context, and, in many cases, there is a clear overlap between the membership of RFMOs with such schemes and of IATTC’s membership.

- **1987** - CCAMLR adopted a [System of Inspection](#) in accordance with the Convention Chapter [XXIV](#)
 - **1998** - NAFO adopted [Chapter VI](#) on joint international inspection schemes with Article 34 since 2012 including Boarding and Inspection Procedures
 - **2006** - WCPFC adopted [CMM 2006-08](#) on boarding and inspection procedures
 - NPFC has had a High Seas Boarding and Inspection Implementation [Plan](#) since 2017 (latest [CMM 2024-09](#))
 - **2019** - SIOFA established a high seas scheme (latest version is [CMM 2021/14](#))
 - **2019** - NEAFC adopted a Scheme of Control and Enforcement ([Chapter IV](#), Inspections at Sea)
 - **2023** - SPRFMO adopted High Seas Boarding and Inspection Procedures in 2023 ([CMM 11-2023](#))
- Prior to this, the procedures were explicitly based on articles 21 and 22 of the UN FSA (CMM 11-2015)

Indicative step by step guide on how HSBI schemes work

Preliminary tasks to be completed at the RFMO level:

1. Develop a prioritisation list of high seas boarding and inspection operations. These should include as minimum:

- Vessels not in the authorised vessels list but which are flagged to a CPC
- Vessels reasonably believed to have engaged in activity in contravention to CMMs
- Vessels without observers
- Vessels with a history of non-compliance
- Vessels on an IUU vessel list
- Stateless vessels
- Specific fleet segments/gears based on a risk analysis

2. CPC Cooperation Agreements: CPCs to identify opportunities to place authorised inspectors on inspection vessels of another CPC. Where appropriate, bilateral or multilateral arrangements to this effect should be prioritised. Increased collaboration helps build enforcement capacity through information sharing, workshops, field exercises, training, joint patrols and cooperation at operational level. These procedures are implemented in a transparent, inclusive, uniform and non-discriminatory manner, taking into account observers onboard vessels, results of past inspections and inspection activities carried out by CPCs to their own flag vessels.

3. Establish a register of all authorised inspection vessels and authorities or inspectors which is kept up to date and made available to CPCs at all times.

4. Secretariat tasked to receive pre-boarding notifications and post-inspection reporting.

5. Annual reporting of implementation of the high seas boarding and inspection schemes, including cases that may be forwarded to compliance committee reviews.

Step by step approach to an HSBI event

Step 1: CPCs provide advance notification to the Commission of their intent to conduct boarding and inspection operations in the Convention area and submit a list of authorised inspection vessels and agencies to the Commission. The Commission will maintain a registry of authorised inspection vessels and authorities provided by CPCs. Boarding and inspection operations can begin after the Commission

circulates the updated registry to CPCs. The registry will include the following information:

- Vessel: details (name, description, photograph, registration number, port of registry and, if different from the port of registry, port marked on the vessel hull), international radio call sign and communication capability), vessel status with clear marking that the vessel is in government service.
- Crew: confirmation that the crew has received relevant training in accordance with adopted standards and procedures.
- Inspecting authority: the authorised agency/ authority responsible for boarding and inspection, and confirmation by said authority that the deployed inspectors have received proper training and are familiar with applicable active CMMs.
- In case of military vessels: boarding and inspection is carried out by inspectors fully trained in fisheries enforcement procedures, and duly authorised for this purpose under national laws, and that such inspectors meet the requirements established in these procedures.

Step 2: Vessels and inspectors carry clear identifications on them, including inspection flag, pennant, badges, vests etc.

Step 3: Inspecting party to make best effort to establish contact with vessel to be inspected, fully identify themselves, communicate with vessel's master its intentions and issue a notice through the national authority of inspection vessel to the authorities of the fishing vessel.

Step 4: Communicate during the inspection in a language the vessel master understands. Otherwise, use the relevant part of the RFMO-endorsed standardised multi-language questionnaire.

Step 5: Inspection of vessel, its license, gear, equipment, records, facilities, fish and fish products and any relevant documents necessary to verify compliance.

Step 6: Inspectors prepare and submit a full report on each boarding and inspection carried out and submit it to both the authorities of inspected vessel and to the Secretariat within the agreed period. These reports can then be discussed at preparatory bodies, ahead of the Compliance Committee meeting, to enable CPCs to express their views on the findings. A vessel refusing to accept an authorised inspection is usually considered a serious infringement with potential consequences. These vary depending on the RFMO and may include suspension of the vessel's authorisation to fish, the immediate return to port and/or other sanctions.