



# Best Practices for At-Sea Transshipment Regulation

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**GTA Webinar**

**Holly Koehler**  
Vice President for Policy and Outreach  
[hkoehler@iss-foundation.org](mailto:hkoehler@iss-foundation.org)

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# Transshipment At Sea



**Widely used** in distant water longline tuna fishing fleets



**Reduces operational costs**



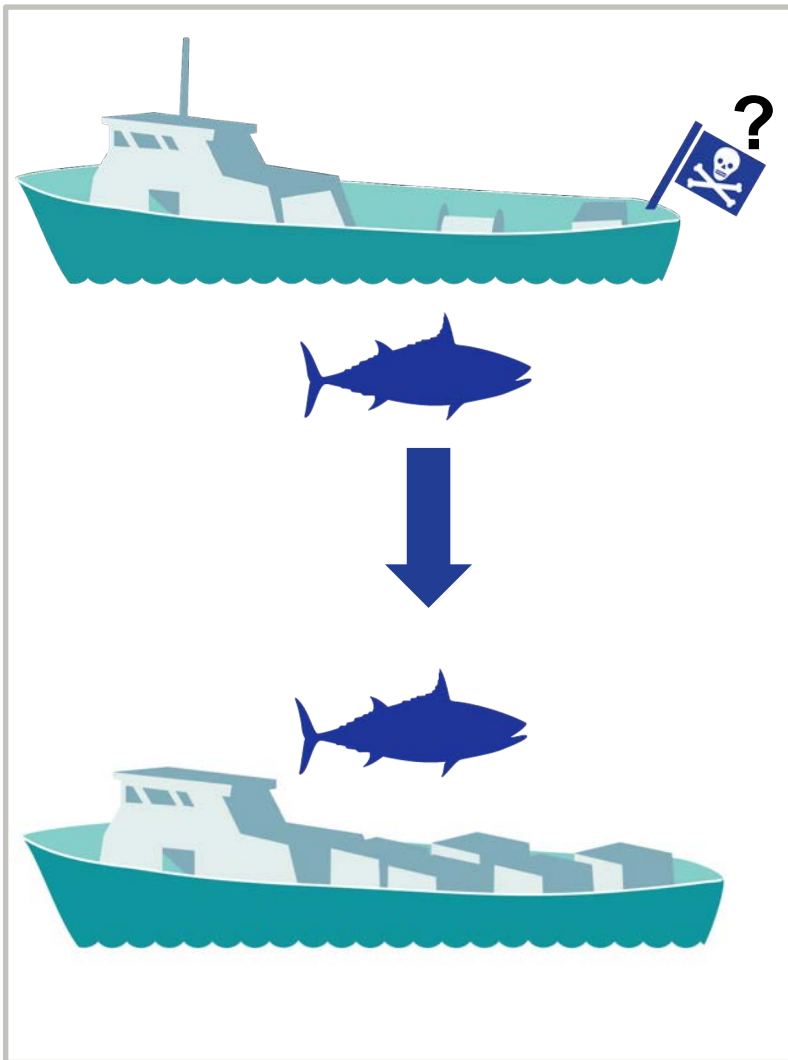
**Maximizes time** on fishing grounds

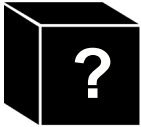
- **No RFMO has a complete prohibition of at-sea transshipment**
- **Tropical tuna RFMOs** (IATTC, ICCAT, WCPFC, IOTC)

**General prohibition of at-sea transshipment**  
for certain gear types (PS)

**Rules to permit at-sea transshipment**  
by other specific gear types/vessel types  
(LSLL mostly) under certain conditions/rules

# Issues with At-Sea Transshipment



- Takes place far from land or ports
- There is a lack of effective monitoring, control, verification & management of at sea-transshipment
- The result is that transshipment at sea can occur in a black box   
➔ **increasing risks of IUU activities**

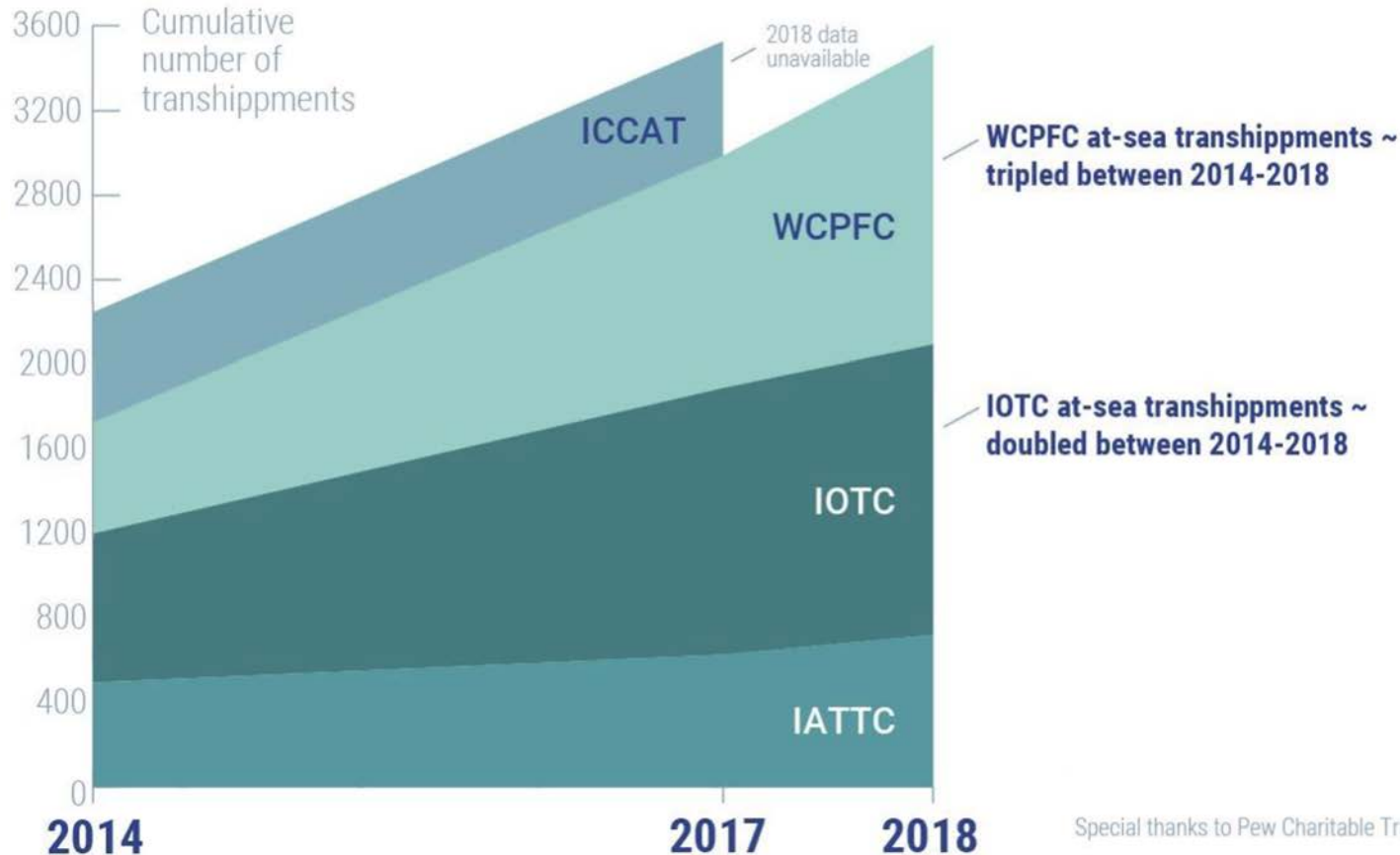
Misreporting of catch  
Non-reporting of data  
Overfishing quotas or catch limits  
Fishing in closed or restricted areas  
Non-compliance with bycatch measures  
Labor and human rights issues

# Issues with Transshipment At Sea

## INCREASING GLOBAL USE

2014-2018 Tuna RFMO:

### Number of Transhippments by Year



Special thanks to Pew Charitable Trusts for compiling these data

# Issues with Transshipment At Sea

## WEAK COMPLIANCE

- **EXAMPLE: In IOTC, in 2018:**
  - Out of 1300+ t/ship events there were ~250 reported infractions
  - 62% level of compliance with IOTC rules
  - 6 out of 7 fleets that transshipped (86%) had vessels with one or more repeated infringements

## INSUFFICIENT RFMOs REGULATIONS

- **EXAMPLE: In IATTC, at-sea transshipment increased significantly (67% jump between 2012–2017)... but its transshipment measure does not require:**
  - Carrier vessels to be flagged to a Contracting Party or Cooperating Non-Member
  - Reports to be submitted in near-real time
  - Carrier and observer report to be shared with all appropriate authorities

# Issues with Transshipment At Sea

## LACK OF EFFECTIVE MONITORING OF ACTIVITIES

- Observers are usually **deployed on the carrier**
- Current **observer coverage of non-purse seine fishing vessels is ~5%** & so RFMOs are unable to verify where tuna transshipped at sea are harvested
- **EM not yet required by tRFMOs**; development of standards progressing
- **Requirements for T/ship observers to monitor activities or verify records** of the fishing vessel varies
- **Observer reports are not shared** among all the needed authorities  
For example in WCPFC, observers on a fishing vessel are **not required to submit a transshipment report** to the Sect or observer program

**RESULT** = In WCPFC between 2016 – 2017, the Sect only received 1 observer transshipment report despite more than 2000 reported at sea transshipments during that period

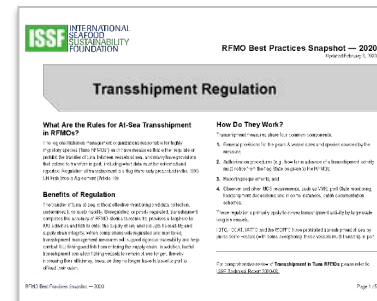


**Key LL nations are RFMO Members**

**tRFMOs unlikely to agree by consensus to ban t/ship at sea**

**Strengthening regulation and closing loopholes is essential**

## Advocate for adoption of best practices at RFMOs



# Need for Stronger Regulation

## Advocate for adoption of best practices at RFMOs

### What are these Best Practices?

- ISSF and Pew Charitable Trusts both developed best practices to reform transshipment.
- ISSF and Pew then collaborated with others in the NGO Tuna Forum to develop a set of Best Practices for Well-Managed Transshipment.

**NGO Tuna Forum Best Practices for Transshipment endorsed by 13 NGOs in 2020.**  
**The GTA also supports the Best Practices.**



Partnership for  
nature and people



**Earthworm**



**GREENPEACE**

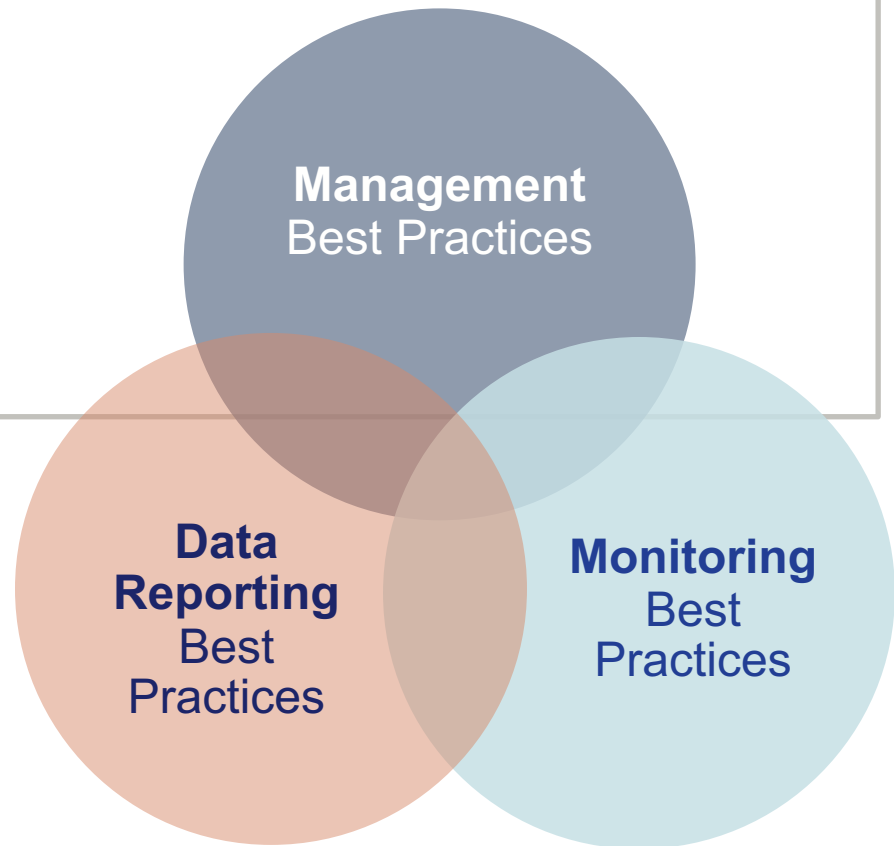




# Need for Stronger Regulation

## NGO Tuna Forum Best Practices

- Includes 14 specific Best Practices and other recommendations
- Reviewed annually
- Cover three core areas →



# NGO Tuna Forum Best Practices

## IMPROVE MANAGEMENT



- **Prohibit vessels from acting as both** a fishing vessel and carrier vessel on the same trip.
- **Require all carrier vessels to be flagged** to an RFMO member or at minimum a Cooperating Non-Member.
- **Ensure that all RFMOs establish a publicly available record** of all vessels authorized to engage in at-sea transshipment activities.
- **Require that vessels have an IMO number** in order to be authorized to transship.
- **Establish and implement guidelines** for how vessels receive authorization to transship at sea, including criteria defining under which circumstances a flag state can authorize its flag vessels to transship at sea, the MCS measures that must be in place, data collection and reporting requirements, and process for the RFMO to review issued flag state authorizations to ensure compliance.

# NGO Tuna Forum Best Practices

## IMPROVE DATA & REPORTING

- **Require information on all at-sea transshipment events** (notifications, declarations, observer reports) to be reported to the relevant RFMO Secretariats, flag states of both vessels, port state and coastal state, with summarized information reported publicly by the RFMO.
- **Require advanced notification** be provided to all relevant authorities at least 48 hours before the at-sea transshipment activity.
- **Mandate that all post activity declarations and observer reports** be provided to all relevant authorities, ideally immediately, but in every instance, no greater than 24 hours after the event.
- **Establish procedures to share data** (transshipment declarations, reported catch, position reports, observer reports) among relevant flag state, coastal state, port state authorities and RFMO Secretariats.



# NGO Tuna Forum Best Practices

## IMPROVE MONITORING

- **Require that all vessels authorized to conduct at-sea transshipment have an operational VMS system** onboard and that VMS position data are provided to the relevant RFMO Secretariat in near-real time.
- **Require the use of AIS** in case of VMS unit malfunction.
- **Require 100% observer coverage** (human, electronic or combination) on board both the fishing vessel and the carrier vessel for all at-sea transshipping events.
- **Require binding measures and specific training** to ensure human observer safety, such as those highlighted in Policies and Recommendations to Improve the Safety of Fisheries Observers Deployed in Tuna Fisheries.
- **Ensure there is a mandate for binding data collection protocols** for transshipment observers, including data for both scientific and compliance purposes.



# Tuna RFMO Implementation

IOTC & WCPFC as of Feb. 2020

RFMO	Application				MCS, Data Reporting & Sharing						Authorisation & Notifications		
	Includes all vessels operating outside their EEZ and/or in one or more EEZs	Includes all RFMO spp, and non-target spp caught in association with regulated fisheries, that are or could be trans-shipped	Covers all spatial areas under the remit of the RFMO, including reporting in archi-pelagic and territorial waters <sup>7</sup>	Receiving vessels must be flagged to CPs or CNMs	100% observer coverage by independent observers or e-monitoring on both the fishing vessel and the carrier vessel for all at-sea transshipping events + Binding measure on observer safety	Require VMS and AIS on all authorised t'shipment vessels, polling to the RFMO in near real-time	Mandatory IMO number for all vessels permitted to undertake at-sea transshipment, public display and on the transshipment declaration	Prohibit from acting as both fishing and receiving vessel on the same trip	Standardise all t'shipment declaration data and formats <sup>8</sup> + Data Sharing among RFMOs <sup>9</sup>	Provide a public list of all vessel authorised to transship	Infractions reported to flag States and RFMO; if insufficient action taken vessel automatically included on Draft IUU Vessel list	Guidelines, incl. criteria, for authorizing transshipment by flag State, and a review process of authorisations	Fishing vessel: advanced notification at least 48 hrs prior. + Near real-time for all other elements
IOTC													
	✗	✗	✗	✗	100% observer coverage on carriers (except Indonesia)  ✗ Safety	Not required to report to RFMO	✗	✗	✓ Forms ✗ Data sharing	✗	✓ Infractions ✗ Draft IUU Listing	✗	✗
WCPFC													
	✓	✓	✗	Except when non-member flagged vessel is under charter, lease or other arrangement	100% observer coverage on carriers or offloading vessel <sup>10</sup>  ✓ Safety	✓	IMO numbers are included on the transshipment declaration	✗	✗	✓	✗	✗ In 2017, mandated to develop guidelines for "impracticability" of not transshipping at sea	Requires 36 hour advance notice

# Tuna RFMO Implementation

IATTC & ICCAT as of Feb. 2020

RFMO	Application				MCS, Data Reporting & Sharing						Authorisation & Notifications		
	<i>Includes all vessels operating outside their EEZ and/or in one or more EEZs</i>	<i>Includes all RFMO spp, and non-target spp caught in association with regulated fisheries, that are or could be trans-shipped</i>	<i>Covers all spatial areas under the remit of the RFMO, including reporting in archipelagic and territorial waters<sup>4</sup></i>	<i>Receiving vessels must be flagged to CPs or CNMs</i>	<i>100% observer coverage by independent observers or e-monitoring on both the fishing vessel and the carrier vessel for all at-sea transshipping events + Binding measure on observer safety</i>	<i>Require VMS and AIS on all authorised t'shipment vessels, polling to the RFMO in near real-time</i>	<i>Mandatory IMO number for all vessels permitted to undertake at-sea transshipment, public display and on the transshipment declaration</i>	<i>Prohibit from acting as both fishing and receiving vessel on the same trip</i>	<i>Standardise all t'shipment declaration data and formats<sup>5</sup> + Data Sharing among RFMOs<sup>6</sup></i>	<i>Provide a public list of all vessel authorised to transship</i>	<i>Infractions reported to flag States and RFMO; if insufficient action taken vessel automatically included on Draft IUU Vessel list</i>	<i>Guidelines, incl. criteria, for authorizing transshipment by flag State, and a review process of authorisations</i>	<i>Fishing vessel: advanced notification at least 48 hrs prior. + Near real-time for all other elements</i>
IATTC													
	✗	✓	Covers only HS and EEZs	✗	100% observer coverage on carriers ✓ Safety	Does not require reporting to RFMO	✗	✗	✓ Forms ✗ Data sharing	✗	✗	✗	✗
ICCAT													
	✓	✓	Covers only HS and EEZs	✗	100% observer coverage on carriers ✗ Safety	Does not require reporting to RFMO	IMO numbers are included on the transshipment declaration	✗	✓	List is not public	✗	✗	✗



## Making Progress in Meeting the Commitments of the Tuna 2020 Traceability Declaration & Goals of the GTA

- **Traceability is a fundamental building block** in the fight to eliminate IUU fishing and achieve sustainable tuna fisheries.
- **The Tuna 2020 Traceability Declaration (TTD)** commits signatories to ensure all tuna products in their supply chains will be fully traceable to the vessel and trip dates.
- **The TTD Government Partnership commitment also commits signatories to work with governments** to establish systems to identify and restrict illegal seafood and through government-led measures on traceability and transparency

Supporting and advocating for reform of transshipment at sea will assist TTD signatories in meeting your commitments by **strengthening the transparency, traceability and accountability** of your tuna supply chain.

# Strengthening Transshipment At Sea

## What YOU can do:

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### *Use the NGO Forum Best Practices to:*

- **Advocate to governments** where you have business interest or sourcing tuna products.
- **Participate in national RFMO advisory bodies** or send letters/comments.
- **Talk to your suppliers/FIPs** & ask about the practices of source vessels & request they **follow the Best Practices**
- **Collect KDES on transshipped tuna** in your supply chain — e.g. GDST Standard 1.0.
- **Publically support GTA, ISSF and NGO Tuna Forum** Advocacy Appeals and Position Statements.

Supporting and advocating for reform of transshipment at sea will assist TTD signatories in meeting your commitments by **strengthening the transparency, traceability and accountability** of your tuna supply chain.



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[iss-foundation.org](http://iss-foundation.org)

Email: [info@iss-foundation.org](mailto:info@iss-foundation.org)

**Thank You!**