

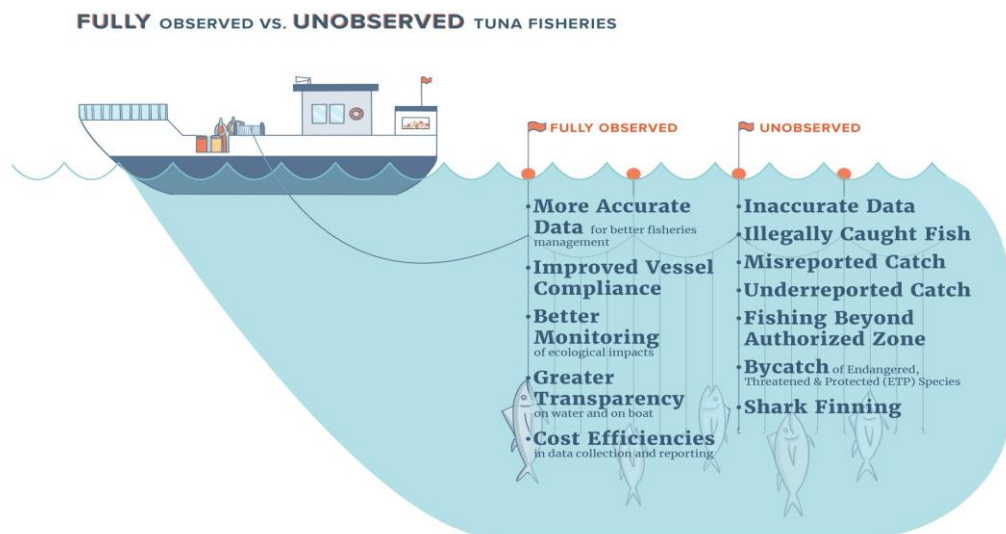
GTA Observer Position

Tuna Fisheries Observers

Fisheries observers play a crucial role in fisheries management; they serve as the front line of scientific research, measurement, assessment and reporting. Fisheries observers have an obligation to report any violations. As such, they help us to better understand the health of our fish populations whilst, at the same time, ensure that rules and regulations are correctly followed

However, in many tuna fisheries around the world, independent monitoring of fishing activity is not mandated¹ which means there is much we cannot see – including many known conservation and compliance problems such as illegal fishing, misreported or unreported catch, and bycatch of endangered, threatened & protected species. What we can't see creates risk to fish stocks, to fisheries, and to companies that purchase tuna.

Regional Fisheries Management Organizations (RFMOs) have the power to reduce these risks by requiring 100% observer coverage – human and/or electronic – on industrial tuna fishing vessels. 100% observer coverage provides the means to mitigate the conservation and compliance issues that put tuna stocks, ocean ecosystems, and tuna supply chains at risk.



Observer Safety

Despite their crucial role in fisheries enforcement, observers' ability to perform their duties is hampered by inadequate legal protection and physical danger. Globally, at least one observer has died or gone missing every year since records began in 2015². Of the 13 fisheries observers that have died in the line of duty over the last decade, many under suspicious circumstances or evidence of homicide, nobody has ever been convicted or otherwise held responsible for those deaths³.

¹ Some RFMOs require only a minimum of 5% coverage for various gear types

² The Association of Professional Observers has documented the death or disappearance of one to two observers every year since 2015, when they started collecting records.

³ <https://globalfishingwatch.org/news-views/life-below-water-prioritizing-safe-and-decent-working-conditions-for-fishers-and-fisheries-observers/>

In 2017, the Western and Central Pacific Fisheries Commission (WCPFC) formalized and codified a comprehensive set of measures designed to address observer safety and security in the region's tuna fisheries, which included establishing emergency action plans as well as requiring two-way communication devices and emergency locator beacons. Other regional fisheries management organisations (RFMOs) such as the Inter American Tropical Tuna Commission (IATTC) followed suit with their own measures. However, these measures were clearly not enough as evidenced by the recent death of Eritara Keiaru Aati, a fisheries observer from Kiribati serving on the Taiwanese flagged purse seiner F/V Win Far 636, whose death in early March 2020 is being investigated as a murder.

Working in collaboration, FishWise and World Wildlife Fund (WWF) have published [*Policies and Recommendations to Improve the Safety of Fisheries Observers Deployed in Tuna Fisheries*](#), which summarises existing policies that could improve observer safety and security in tuna fisheries. The document also outlines a set of recommendations for the implementation of these policies in tuna fisheries where observers operate.

Electronic Monitoring

Technology can go a long way to address the isolation and challenges that fisheries observers face on fishing vessels. Recent technological advances in electronic monitoring systems – proven to work across dozens of pilots over the past two decades, as well as the more than 1,000 electronic monitoring systems currently in place on vessels – make 100% observer coverage feasible now⁴.

The Pew Charitable Trusts have recently published a [*Roadmap for Electronic Monitoring in RFMOs*](#) which explores the necessary elements of a well-designed and effective electronic monitoring program and explores unique considerations for fisheries that are managed by an RFMO. This document can serve as a resource for RFMO staff and government fishery agencies who are interested in the applicability of electronic monitoring in RFMO fisheries and the key decisions involved in developing and implementing a successful EM program.

Electronic monitoring should not, for the foreseeable future, put human observers out of work, but should complement them. Human observers are, however, expensive and require significant resources to manage and deploy; furthermore, observer safety concerns make electronic monitoring a very attractive option in high-seas tuna fishing.

Impact of COVID-19

Several countries/fleets⁵ have recently withdrawn from observer programmes due to COVID-19. Furthermore, tuna RFMOs⁶ have begun to relax or remove observer coverage requirements for many of their vessels in response to these withdrawal requests. While it is recognised that these decisions need to be made to protect the health of the observers & fishing crew, the GTA is concerned that this opens up the supply chain to potential IUU and reputational harm from an increased risk of IUU.

Accordingly, we believe it is essential that measures that address workers' health while ensuring fisheries data submission, monitoring and control are implemented.

⁴ The Pacific Island countries have agreed that in the foreseeable future, only EM-equipped vessels will be allowed to fish tuna within the waters under their collective jurisdiction.

⁵ <https://www.rollcall.com/2020/04/10/fishing-fleets-say-noaa-observers-are-too-risky-amid-pandemic/>

⁶ [WCPFC](#), [ICCAT](#) and [IOTC](#)

GTA Asks

Observer Coverage

GTA companies are committed to ensuring that tuna ultimately meets the highest standards of environmental performance and social responsibility. The potential impacts of relaxation of observer coverage requirements are of major concern to us. Given that this situation may continue for some considerable, and as yet undefined, period of time, we strongly request the following in each tuna RFMO:

- The at-sea observer programs are restored at the earliest practical date without prejudicing the health and safety of observers and crew.
- The timing of this restoration should be informed by frequent and regular reviews of the developing Covid-19 situation. In the interest of transparency, these reviews should be published on the RFMO website in a timely manner.
- Require vessels whose observer coverage requirements have been waived to collect, record and report all the data that would have otherwise been observer-provided.
- A commitment to seek rapid agreement amongst members that electronic monitoring is adopted as an accepted complement/alternative to human observer coverage of all fleets/vessels operating within each RFMO Convention Area.

We call on each tuna RFMO secretariat to develop and publish procedures to be implemented to address our concerns.

Observer Safety

- Regulatory authorities (flag and coastal states) and their respective observer programs should work together to implement the International Observer Bill of Rights (IOBR) at the RFMO level⁷
- Alongside Recommendation the IOBR, regulatory authorities (flag states and coastal states) and their respective observer programs should support the adoption of the WCPFC mandatory observer safety reforms by all tuna RFMOs.

GTA Partner Commitments

Observer Coverage

- GTA Partners agree to temporarily accept products caught under 'observer-waivered' trips only from fleets/vessels that commit to demonstrably supporting the GTA's call for 100% observer coverage at relevant RFMOs⁸.
- GTA Partners agree to review sourcing requirements for tuna and adopt aspirational timelines (e.g. sourcing X% of supply from vessels with 100% observer coverage (human and/or electronic) by 202[Y] increasing to 100% over Z timeframe).

Observer Safety

- GTA Partners will advocate for Member States, regulatory authorities and their respective observer programs to work together and implement the IOBR at the RFMO level.
- GTA Partners will advocate for regulatory authorities and their respective observer programs to work together to implement the WCPFC mandatory observer safety reforms at other RFMOs.
- GTA Partners agree to add a sourcing requirement for tuna for enhanced observer safety. Until the time when all RFMOs implement the IOBR and WCPFC mandatory observer safety reforms, Partners will adopt aspirational timelines (e.g. sourcing X% of supply from RFMOs which have implemented the IOBR and WCPFC mandatory observer safety reforms by 202[Y] increasing to 100% over Z timeframe).

⁷ The International Observer Bill of Rights (IOBR) guidelines for ensuring fair and safe working conditions for observers, empowering them to freely report their findings and ensure the validity of their data.

⁸ Including signing on to GTA letters, joining RFMO side-events, evidencing engagement with RFMOs.