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Introduction

The World Wide Fund for Nature (WWF) would like to again thank the Western and Central Pacific Fisheries Commission (WCPFC) for the opportunity to attend the 20th Regular Session as an observer and to address the critically important role that it plays in the proper management of the Western Central Pacific Ocean (WCPO) fisheries.

WWF once again calls on members of the WCPFC to address the issues and recommendations raised at SC19, NC19, TCC19, and WCPFC19. WWF would like to note that this Position Statement is not comprehensive, but that does not mean that WWF does not believe that other issues not included in this statement are not important. WWF wishes to reiterate its position offered in previous meetings and the recommendations listed below as well as other documents submitted to the WCPFC for review as Observer Papers.

Fisheries Observers

The issue of observer coverage is critically important to the WCPO fisheries because it cuts across science as well as monitoring and compliance. Thus, because of the ongoing failure of the WCPFC to make significant progress toward adequate levels of observer coverage in the non-purse seine fleet, WWF has chosen to make this issue a standing position until such time as progress is made. It is unquestionable that information collected as part of a successful observer programme is critically important to the proper conservation and management of a fishery. Data collected by observers plays a central role in informing fisheries scientists and managers on everything ranging from stock assessments to non-target species impacts.ⁱ Furthermore, observers play an indispensable role in monitoring and documenting compliance with very important CMMs in the WCPO.ⁱⁱ Therefore, securing appropriate observer coverage must be considered a top priority and member states must make a concerted effort to achieve that coverage.

All CCMs agreed to the Convention on the Conservation and Management of Highly Migratory Fish Stocks in the Western and Central Pacific Ocean (WCPF Convention) text and other Commission obligations to ensure the *best scientific information or evidence available* is used in WCPFC decisions.ⁱⁱⁱ By its plain reading, this obligation not only requires members to actively *seek out* and *use* the best available scientific evidence, but also compels CCMs to ensure that measures taken result in the *generation* of the best available scientific evidence.^{iv} Any other interpretation would be illogical. Therefore, the WCPFC is obligated under the WCPF Convention to put data collection processes, including observer coverage, in place that secures the production and use of the best available scientific evidence for use in the WCPFC decision making process.

Calculation of Observer Metric

Almost 17 years ago, the WCPFC established CMM 2007-01, which specified that coverage is to be 5% of effort in each non-purse seine fishery under the jurisdiction of the Commission and shall be achieved no later than 30 June 2012.^v Specifically, low observer coverage in the longline fishery was identified as a significant conservation risk. Moreover, as indicated by the discussion at that time as well as discussion among members at WCPFC forums since, the arbitrary benchmark established at 5% was considered a starting point for a stepwise progression to appropriate observer coverage, never a final target as implied by some CCMs. Unfortunately, not only has achieving the principal objective of CMM 2007-01 proven difficult, but even measuring how it is achieved remains unsettled.

At the moment, members self-report their longline observer coverage under four separate metrics including:^{vi}

- Days at Sea - days observer is at sea compared to number of days fleet is at sea;
- Number of Trips - number of observer trips compared to trips by the fleet;
- Days Fished - observed fishing days compared to fleets fishing days; and
- Number of Hooks - number of hooks observed compared to fleet hooks used.

Because these metrics are each calculated differently and subject to different biases, it places an unnecessary burden on the scientific service provider to standardise data in such a way as to properly assess coverage. In effect, it forces the scientific services provider, and ultimately the WCPFC, to “compare apples with oranges” in a way that frustrates efficient analysis and, ultimately, timely and proper management. Moreover, because of the biases of the different metrics, it creates inequity among members that places more of the conservation and compliance burden on those using a more accurate and precise metric that is less susceptible to bias and manipulation.

The best scientific information available suggests that “number of hooks” represents the best method for achieving multiple objectives, including effectively calculating effort and accurately assessing rare events like seabird interactions.^{vii} Several member states are currently assessing their observer coverage based on “number of hooks,” proving it is practically feasible. Consequently, WWF recommends that the WCPFC confirm “number of hooks” as the best practice metric for all members calculating observer coverage on longline vessels and mandate a 5-year time frame to shift to use of this metric. If other metrics for calculating coverage are used in the transition toward “number of hooks,” terms must be very clearly defined in advance and each metric must be calculated and reported by members in a way to be comparable with “number of hooks” to the maximum extent possible.

Level of Observer Coverage

First, COVID-19 is no longer an acceptable excuse for observer coverage rates on the non-purse seine fleet to remain unacceptably low. Recent efforts by the Pacific Community to standardise observer coverage data indicate that region-wide observer coverage remains less than 5%.^{viii} However, the best available scientific evidence indicates that even a consistently applied level of 5% coverage is statistically and practically useless to effectively achieve most management^{ix} or compliance objectives.^x

Low observer coverage exacerbates bias as a result of fishers altering their fishing practices (e.g. discarding practices, handling and release practices, effort) and gear when an observer is present, which is a phenomenon known as the “observer effect.”^{xi} The higher the observer coverage rate, the

lower the bias from an observer effect, while the larger the proportion of fishing effort that is observed, the more accurately the monitoring data characterize or represent the fishery. Notwithstanding the observer effect, at just 5%, current observer coverage is not producing the quality or quantity of data necessary to properly manage the WCPO non-purse seine tuna fisheries.

At present, a lack of sufficient data that is typically generated through adequate observer coverage represents the single largest obstacle to establishing appropriate management measures. Uncertainty is continually cited in the WCPFC process as a reason for inaction, while the certainty offered by improved observer coverage seems to be consistently rejected, deferred, and delayed. Meanwhile, substantial advancements in technology, particularly camera hardware and software as well as complementary Artificial Intelligence and Machine Learning tools, have made electronic monitoring increasingly economical and practical.

WWF accepts that different minimum levels of observer coverage may be necessary for different management or compliance purposes, depending on specific identified objectives. However, data collected under less than 100% coverage may be biased and misrepresent the fishery overall, resulting in management failures. Alternatively, 100% observer coverage, through human or electronic observers, would result in no bias from an observer effect. Thus, along with a consortium of other NGOs and with the support of prominent market partners, we have determined that because of conservation and compliance problems such as illegal fishing, misreported or unreported catch, and bycatch of endangered, threatened and protected species, that only an observer coverage rate of no less than 100%, through human observers or electronic monitoring, is acceptable.^{xii}

By continuing to fail to secure a scientifically or statistically valid level of observer coverage, particularly on longline vessels, the WCPFC fails to meet the charge of the WCPF Convention to generate and use the best available scientific information. Therefore, the WCPFC must take action to improve observer coverage across all longline vessels operating in the WCPFC Convention Area.

Observer Health, Safety, and Welfare

WWF remains concerned that some CCMs are not meeting their obligations under CMMs 2017-03 and 2018-05 to ensure the safety and security of fisheries observers. Where observers may be deployed under the current protocols, CCMs must ensure appropriate precautions and provide the required safety equipment to observers upon deployment. WWF would also like to note that the observer coordinator's contact list has not been sufficiently updated, which could lead to failure in the adequate execution of efforts under an Emergency Action Plan (EAP).

WWF again calls for a transparent standardised process for reporting observer safety and security incidents, noting the lack of available information when, or even well after, incidents occur. As a matter of health and human safety that the WCPFC has clearly committed to address through the respective CMMs, CCMs must ensure that its commitments to the health, safety, and welfare of fisheries observers continue to be met.

WWF recommends the WCPFC:

- **Recognise the calculation of observer coverage on the basis of “number of hooks” as best practice and mandate a transition to calculation of observer coverage based on “number of hooks”;**

- **Establish a stepwise plan to increase observer coverage, by human observers or electronic monitoring, across all longline vessels operating in the WCPFC Convention Area on an annual basis to achieve 100% coverage by 2026; and**
- **Transparently and decisively address failures to meet obligations for observer safety and security, including updating the observer coordinator’s contact list and developing standardised and transparent reporting on observer safety and security incidents.**

Harvest Strategies

WWF remains supportive of the work of the WCPFC and subsidiary bodies in pursuing the implementation of a Harvest Strategy (HS) approach as agreed under CMM 2014-06 and Supplementary Information on Workplan (workplan) for the adoption of Harvest Strategies. Consistent with previous WWF position statements and recommendations, WWF continues to encourage WCPFC20 to advance the development and adoption of explicit Limit and Target Reference Points (LRP/TRP), Harvest Control Rules (HCRs) or Management Procedures (MPs), and HSs for all stocks under WCPFC authority.

WWF requests that WCPFC20 observe the importance of and strong support for these important management measures, specifically the adoption of TRPs and HCRs/MPs for the key target species. We again note the advocacy from prominent industry participants with Marine Stewardship Council (MSC) certification as well as the independent support from many important markets.

Consistent with WWF’s ongoing call to develop HSs for all species, WWF would like to draw attention to the need to develop and adopt an LRP for blue sharks (BSH). The best available science suggests that there is sufficient and robust evidence to support establishing an LRP that could put BSH on the path to an appropriate HS.^{xiii}

Therefore, WWF encourages WCPFC20 to support continued momentum on implementation of HS elements, and, where necessary, take steps to recover timelines under the workplan.

WWF recommends that the WCPFC:

- **Support and endorse further implementation of CMM 2014-06 on Establishing a Harvest Strategy for Key Tuna Species in the WCPO;**
- **Establish precautionary TRPs for bigeye (BET) and yellowfin (YFT);**
- **Adopt an HCR for NP ALB to implement the HS for NP ALB fishery adopted in 2022;**
- **Fully implement a comprehensive HS, adhering to a management procedure including effort constraints or resource-sharing mechanisms that follow scientific advice, for SKJ;**
- **Expedite the development of a HS for SP ALB longline (LL) fishery that fluctuates around the established TRP; and**
- **Endorse the continued development and implementation of LRPs and TRPs for proper management of all stocks, including sharks, as a priority.**

Transshipment Monitoring

Transshipment remains one of the most prominent weaknesses in catch documentation and verification that leads to Illegal, Unreported, and Unregulated (IUU) catch in the WCPO.^{xiv} WWF again notes that the most simple, efficient, and effective solution to the challenges of transshipment-related IUU is to simply prohibit all at-sea transshipment and require all fishing vessels to land their catch at the nearest available designated port in the WCPO following the conclusion of fishing activity. However,

acknowledging that such a prohibition on transshipment is politically unlikely, WWF supports substantial reforms and improvements for all at-sea transshipments, including:

- 100% monitoring through human observers or EM on all delivering and receiving vessels;
- prompt advance notification of all transshipments;
- timely delivery of all transshipment reports to the WCPFC; and
- strong sanctions for non-compliance.

WWF would like to specifically note that the transshipment issue is an imminently solvable problem because a relatively small proportion of vessels and flags operating in the WCPO region represent a large proportion of the transshipment activity.^{xv} Globally, 130 carrier vessels are responsible for more than 70% of RFMO-related transshipment activities. Moreover, the vast majority of transshipments occur between China and Panama according to a recent study.^{xvi}

Additionally, claims of impracticability in the WCPFC are undermined by three issues highlighted in the recent Annual Report on Transshipment Reporting presented to TCC19.^{xvii} First, the report indicates that transshipment continues to be the rule rather than the exception among some fleets, with as much as a third of the albacore and bigeye tuna catch subject to transshipment.^{xviii} Second, analysis suggests that unaccounted and unauthorised transshipment is occurring between longline vessels, emphasising both the need for improved monitoring through observer coverage as well as additional research into the practice.^{xix} Third, evidence also suggests that swordfish caught in a separate area of the ocean are transhipped on the high seas after transiting thousands of miles and passing multiple ports in the process.^{xx}

WWF also recommends that transshipment requirements be buttressed by verification and validation of transshipment activities through redundant systems such as the use of a vessel monitoring system (VMS) supplemented by an operating automated identification system (AIS). This should be complemented by proposed proximity alerts in the WCPFC VMS system. If, through investigation of suspected unreported transshipment activity, supporting procedures and technologies indicate that transshipment activity was conducted in violation of transshipment rules, the offending vessel should be subject to sanctions including removal from good standing, license revocation, and listing on the IUU vessel list.

WWF supports, where appropriate, the adaptation and adoption of the ROP observer data fields reflecting the TS-IWG recommendations. This approach ensures that observer data related to transshipment activities will start to become available in a timely way for use in monitoring and verification of transshipment events and of data reported on transshipment declarations. As a supplement to these efforts, WWF recommends WCPFC recommend prioritising and expediting implementation of the TSER, E-reporting system to support better transshipment verification and validation.

WWF would specifically like to address the previous decisions of the Commission to limit access by the WCPFC to receive some VMS data, including from vessels on the WCPFC Record of Fishing Vessels, which are transshipping WCPFC caught fish outside the Convention Area. These decisions were based on the costs of VMS position that are no longer relevant, so WWF strongly recommends that this exception for transmission of VMS data be eliminated.

WWF recommends the WCPFC:

- **Support 100% observer coverage on delivering and receiving vessels engaged in at-sea transshipment;**
- **Prioritise the development and application of EM for transshipment monitoring; and**
- **Support or endorse the use of technology to verify and validate transshipment activity.**

Crew Welfare

WWF fully supports the efforts of the WCPFC toward improving crew welfare in the WCPO, including the establishment of a binding CMM. We reference previous submissions by WWF and other participating NGOs supporting improvements in human and labour rights in all WCPO fisheries. Thus, we agree strongly with the FFA members that improving crew labour standards and the passage of a binding CMM focussing on crew labour standards represents a key priority.

We support the progress to date made by the Crew Welfare IWG and commend the leadership of Indonesia and New Zealand to progress this work, ultimately delivering a sufficient foundation to start to address human and labour rights in the WCPO fisheries. However, WWF believes that the current language of the proposed CMM falls short in one key area. As a specific priority within the proposed CMM, WWF notes the need to fully understand and track the scope and scale of crew welfare across the fishing fleet operating in the WCPFC. Thus, WWF emphasizes the explicit need for a recordkeeping and reporting requirement maintained by the WCPFC Secretariat for all injuries and fatalities that occur on board fishing vessels subject to compliance oversight by the WCPFC, which would be consistent with and complementary to existing requirements from the International Maritime Organization (IMO) to report 'serious marine casualties.'^{xxi}

WWF recommends the WCPFC:

- **Insist on the inclusion of a recordkeeping and reporting requirement for all crew injuries and fatalities that occur on board fishing vessels operating in the WCPFC; and**
- **Adopt the proposed CMM recommendations of the Intersessional Working Group to Improve Crew Labour Standards.**

Shark Conservation Measure

WWF commends the recent decision of WCPFC19 to ban both shark lines *and* wire leaders to ensure the sustainability and survival of several shark species in the WCPO. This represents a significant step not only toward addressing the rapid depletion of several key shark species, but also the fact that oceanic whitetip sharks (OCS) remain overfished and are experiencing overfishing and silky sharks (FAL) continue to experience overfishing. However, WWF maintains substantial concerns with other provisions of the agreed measure. Specifically, we believe requirements to "stow" wire leads when "targeting tuna and tuna-like species" create more monitoring and enforcement challenges than simply not having wire leads on board. Low observer coverage in the longline fleet and low rates of high seas boarding and inspection renders the wire prohibition meaningless considering ambiguous requirements to stow wire leads. WWF believes that the prohibition on wire leads should be clear and unambiguous, with no provision for wire leads to be kept on board the vessel.

WWF would also like to raise the issue of continued shark finning^{xxii} in the WCPO longline fleet and the need to tighten requirements in CMM 2022-04 to ensure shark finning does not occur. We note that all

sharks landed by all vessels licensed to fish within FFA members' waters and those flagged to FFA require all fins to be naturally attached, or finning is managed through alternative measures. We would suggest that if any fleets are able to deliver sharks with fins naturally attached then all should be able to, leaving no need for alternative measures. The alternative measures in CMM 2022-04 create substantial loopholes preventing adequate monitoring and compliance. Any provision that allows fins to be separated from sharks in a way that requires counting or matching fins effectively frustrates efficient and effective enforcement. The most effective solution is to simply require fins naturally attached with, at most, an allowance for partial cut and fold of shark fins to reduce the potential for claimed injuries to crew. Our MCS professionals have enough to do, and we should be making their jobs easier, not more difficult.

WWF recommends the WCPFC:

- **Revise the Conservation Management Measure for Sharks (CMM 2022-04), to explicitly prohibit carrying wire trace on board vessels operating in the WCPO and require fins naturally attached with no exceptions.**

Pacific Bluefin Tuna

Technical reports of all scientific and management bodies responsible for management of the Pacific bluefin (PBF) tuna stock, including the International Scientific Committee for Tuna and Tuna-like Species in the North Pacific Ocean (ISC) and the IATTC, indicate that the Pacific Bluefin tuna stock remains in a depleted condition. However, WWF is encouraged that the current available information indicates that the PBF stock is possibly on track to reach the recovery target of $0.20SSB_{F=0}$ by 2024.

Additional data suggest that recent recruitment continues to be larger than assumed in the low-recruitment scenario used for previous projections conducted by ISC. However, the stock remains heavily overfished and at continued risk of overfishing. Therefore, despite some positive signals, WWF maintains significant concerns regarding the health of the PBF stock and remains committed to restoring and rebuilding this ecologically, sociologically, and economically important fishery resource. Therefore, WWF recommends the WCPFC decline any proposals that increase current catch limits at this time while strongly encouraging the establishment of explicit Harvest Strategy elements.

WWF recommends that the WCPFC:

- **Reaffirm support for establishing a precautionary comprehensive Harvest Strategy for PBF, to include appropriate Limit and Target Reference Points (LRP/TRP) and Harvest Control Rules (HCR);**
- **Decline any increase in catch limits for PBF; and**
- **Support the development of a Catch Documentation Scheme (CDS) for the thorough monitoring of PBF mortality to ensure proper catch accounting and stock assessment.**

- ⁱ See e.g. Davies, S.L. 2003. Guidelines for Developing an at-Sea Fishery Observer Programme. FAO Fisheries Technical Paper 414, ISSN 0429-9345. Food and Agriculture Organization of The United Nations, Rome.
- ⁱⁱ *Id* at 5. (Observers can register compliance with fisheries management laws, regulations and plans; record catch composition, prohibited species, by-catch, size limits, discarding, area and gear restrictions; validate vessel logbooks and the labelling of processed fish.); see also Palma, M.A.E. 2010. Promoting Sustainable Fisheries: The International Legal and Policy Framework to Combat Illegal, Unreported and Unregulated Fishing. Volume 6 of Legal Aspects of Sustainable Development, ISBN 9789004175754. Martinus Nijhoff Publishers, p. 142.
- ⁱⁱⁱ The Convention on the Conservation and Management of Highly Migratory Fish Stocks in the Western Pacific Ocean (WCPFC Convention) establishes the Western and Central Pacific Fisheries Commission (WCPFC). Convention on the Conservation and Management of Highly Migratory Fish Stocks in the Western and Central Pacific Ocean, Part II, Article 5, paragraph (b) ("...the members of the Commission shall...ensure that such measures are based on the best scientific evidence available..."), Sept. 5, 2000, 2275 U.N.T.S. 40532, <https://www.wcpfc.int/system/files/text.pdf>.
- ^{iv} *Id* at Part III, Article 10, paragraph (1)(e) ("...the functions of the Commission shall be to...compile and disseminate accurate and complete statistical data to ensure that the best scientific information is available...").
- ^v WCPFC, *Conservation and Management Measure for the Regional Observer Programme*, at 9, CMM 2007-01 (Dec. 2-7, 2007), <https://www.wcpfc.int/doc/cmm-2007-01/conservation-and-management-measure-regional-observer-programme> [Superseded by CMM 2018-05, which consolidated other observer related issues into a single measure]
- ^{vi} WCPFC, Status of Observer Data Management, SC17-ST-IP-02 Status of Observer Data Management_1, at 18, Table 4 (Sept. 2, 2021)
- ^{vii} Dietrich, K. *et al.* Best Practices for the Collection of Longline Data to Facilitate Research and Analysis to Reduce Bycatch of Protected Species, NOAA Technical Memorandum NMFS-OPR-35 March 2007. at 25, March 2007. ("Fishing effort can be derived from information collected on number of hooks deployed or retrieved. The number of hooks deployed was ranked as critical or preferred by 81% of data user[s]..."); see also IATTC, Scientific Advisory Committee, SAC-10-04 – Longline observer program reports, at 2 (13-17 May 2019) ("Number of hooks is considered a more accurate measure of longline effort."); see also IATTC, Scientific Advisory Committee, SAC-10 INF-H - Standardization of Reporting Formats and Effort Reporting for Longline Fisheries (Resolution C-11-08), at 3, (13-17 May 2019) ("...number of hooks is the most precise, and is the standard metric used both by the other tuna RFMOs and by the IATTC for scientific purposes.")
- ^{viii} *Supra* note 6 at 18-22, Tables 3, 4, and 5. (Sept. 2, 2022).
- ^{ix} See Lawson, T. 2003. Observer coverage rates and the accuracy and reliability of estimates of CPUE for offshore longline fleets targeting South Pacific albacore. Working Paper SWG-4. Sixteenth Meeting of the Standing Committee on Tuna and Billfish, 9-16 July 2003, Mooloolaba, Queensland, Australia. Oceanic Fisheries Programme, Secretariat of the Pacific Community, Noumea, New Caledonia; See also Lawson, T. 2004. Observer coverage rates and reliability of CPUE estimates for offshore longliners in tropical waters of the Western and Central Pacific Ocean. Working Paper SWG-4, Seventeenth Meeting of the Standing Committee on Tuna and Billfish, 9-18 August 2004, Majuro, Republic of Marshall Islands.
- ^x Benoit, H., Allard, J. 2009. Can the data from at-sea observer surveys be used to make general inferences about catch composition and discards? *Can. J. Fish. Aquat. Sci.* 66: 2025-2039.; Babcock, E.A., E.K. Pikitch, G. Hudson. 2003. How Much Observer Coverage is Enough to Adequately Estimate Bycatch? Pew Institute for Ocean Science, Miami, FL, and Oceana. Washington.
- ^{xi} Gilman, Eric & Zimring, Mark. 2018. Meeting the objectives of fisheries observer programs through electronic monitoring. 10.13140/RG.2.2.28000.99846.
- ^{xii} Leading Environmental NGOs Stand Together to Call for 100% Observer Coverage on Industrial Tuna Fishing Vessels (June 29, 2019) *retrievable at* <https://www.pnewswire.com/news-releases/leading-environmental-ngos-stand-together-to-call-for-100-observer-coverage-on-industrial-tuna-fishing-vessels-300873686.html>.
- ^{xiii} See Neubauer P, *et al* (2021) Stock assessment of Southwest Pacific blue shark. In: WCPFC Scientific Committee 17th Regular Session. WCPFC-SC17-2021/SA-WP-03, Electronic Meeting. See also Druon, J. *et al*, (2022) Global-Scale Environmental Niche and Habitat of Blue Shark (*Prionace glauca*) by Size and Sex: A Pivotal Step to Improving Stock Management. *Front. Mar. Sci.* 9:828412. doi: 10.3389/fmars.2022.828412.
- ^{xiv} See e.g. Boerder K., *et al*, Global hot spots of transshipment of fish catch at sea. *Science Advances* 25 Jul 2018: Vol. 4, no. 7, DOI: 10.1126/sciadv.aat7159.
- ^{xv} See e.g. G.A. Petrossian, B. Barthuly, and M.C. Sosnowski, "Identifying Central Carriers and Detecting Key Communities Within the Global Fish Transshipment Network" (2022), <https://doi.org/10.3389/fmars.2022.798893>; See also The Pew Charitable Trusts, "Most Global At-Sea Transshipment Involves a Small Group of Key Carriers," (2023), <https://www.pewtrusts.org/-/media/assets/2023/04/global-at-sea-transshipment.pdf>.
- ^{xvi} *Id.*
- ^{xvii} WCPFC, Annual Report on WCPFC Transshipment Reporting, TCC19-2023-RP03, (September 18, 2023).
- ^{xviii} *Id* at 1-3.
- ^{xix} *Id* at 43, Figure 33.
- ^{xx} *Id* at 48, Figure 38.
- ^{xxi} See International Maritime Organization (IMO). Casualties. (November 3, 2023), <https://www.imo.org/en/OurWork/MSAS/Pages/Casualties.aspx>.
- ^{xxii} See A. Asnawi, Indonesian illegal shark and ray exports remain rampant amid poor monitoring, *Mongabay.com* (August 8, 2023), <https://news.mongabay.com/2023/08/indonesian-illegal-shark-and-ray-exports-remain-rampant-amid-poor-monitoring/>; See also Philip Jacobson & Basten Gokkon, Shark finning rampant across Chinese tuna firm's fleet, *Mongabay.com* (Nov. 1, 2022), <https://news.mongabay.com/2022/11/exclusive-shark-finning-rampant-across-chinese-tuna-firms-fleet/>.

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