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**Statement to WCPFC20**

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**WCPFC20-2023-OP06**  
**20 November 2023**

The Pew Charitable Trusts and The Ocean Foundation

**Statement to the 20<sup>th</sup> Regular Session of the  
Western and Central Pacific Fisheries Commission  
December 4-8, 2023  
Rarotonga, Cook Islands**

The Pew Charitable Trusts and The Ocean Foundation's International Fisheries Conservation Project welcome the opportunity to participate as observers to the 20<sup>th</sup> annual session of the Western and Central Pacific Fisheries Commission (WCPFC). We appreciate the work of the Chair, Members and Secretariat to convene a hybrid meeting. We urge members to hasten the adoption of approaches that would provide greater resilience and stability to the region's fisheries.

***Modernize management of the tropical tuna fishery by implementing the skipjack management procedure.***

The Commission's tropical tuna fishery for skipjack, bigeye and yellowfin is the largest and most complex of its management arrangements. In its renegotiation of the tropical tuna measure (CMM 2021-01), the Commission should seize the opportunity to bring greater stability and predictability to this globally important fishery. As such, WCPFC should:

- **Ensure the output of the skipjack management procedure (MP) is implemented fully.** The Commission should ensure that the total catch/effort anticipated to take place in the next three years across the Western and Central Pacific Ocean (WCPO) is not greater than what is recommended by the management procedure.
- **Add guardrails to the revised measure.** Although recent fishing effort is below the level recommended by the management procedure there is always a chance that something unexpected could happen. Fishing fleet and member behavior could change suddenly in intensity and/or locations fished. Until hard limits on the high seas, backed by an allocation scheme, are developed, guardrails need to be added to the tropical tuna measure. To do that, the Commission should adopt a provision calling on the skipjack monitoring strategy (Annex III of CMM 2022-01, which will be finalized this year) to clearly identify when actual effort exceeds the tested level of the management procedure, and if that happens to require a renegotiation of the tropical tuna measure's effort limits at the next annual meeting to reduce predicted effort in the following year to the level recommended by the management procedure.

***Secure the long-term health of albacore fisheries through management procedures.***

**The Commission should adopt the Northern Committee recommended management procedure for north Pacific albacore that would create a fully specified management procedure for the stock.** Together with the measure adopted by the Inter-American Tropical Tuna Commission (IATTC), it would create the first multi-organization management procedure in the

world, securing the sustainability and profitability of the fishery for the long term. The proposal contains the information necessary to operationalize the formulaic harvest control rule, consistent with the specifications agreed last year. **Similarly, the Commission should make progress by revising the target reference point for South Pacific albacore via adoption of [WCPFC20-2023-DP07](#).** The stock is in a healthy condition, but a management procedure is urgently needed to set the WCPFC's overall goal for the stock and to implement pre-agreed rules to reach that goal. Using a target reference point expressed as a baseline period of years insulates it from changes in the knowledge of the stock that revise its historical biomass depletion.

***Establish the Science Management Dialogue as a permanent body.***

The success of the first meeting in 2022 was clearly demonstrated by its output and WCPFC's adoption of the skipjack MP. **To accelerate momentum in developing management procedures, future dialogue meetings will be essential.** Building on the [terms of reference](#) for the dialogue reviewed by WCPFC15, tasks for 2024 could include providing specific input on the mixed fishery framework and elements of the south Pacific albacore MP.

***Improve the monitoring and reporting of at-sea fishing and transshipment activities.***

The gaps in the Commission's ability to monitor and verify longline and at-sea transshipment activities must be closed to improve the information available for stock assessments and verify compliance with WCPFC obligations. To do that, the WCPFC should:

- **Adopt a stronger measure on transshipment:** The number of transshipments occurring in the WCPFC area and lack of proper reporting provides opportunities for unscrupulous operators to launder Illegal, Unreported and Unregulated (IUU) catch. While the report of the co-chairs of the Transshipment Intersessional Working Group includes many positive elements, several additions to the proposed measure should be made before it is adopted, which would strengthen it to align with the FAO's Transshipment Guidelines and the measures adopted by neighboring RFMOs that close gaps in reporting and allow for the cross-checking and verification of transshipment activity. Improvements should include:
  - Reducing the submission deadline for transshipment declarations;
  - Requiring IMO numbers in reporting on vessel activities (notifications and declarations);
  - Prohibiting vessels from acting as a receiving and offloading vessel on the same trip; and
  - Requiring vessels involved in transshipment to provide information on instances of non-fish supply and crew transfer activities.
- **Require greater monitoring of the longline fishery.** The Commission should agree to increase observer coverage of large-scale longline vessels to at least 30 percent via human or electronic monitoring, with the ultimate goal of full coverage of the fleet. The existing requirement of 5 percent coverage was never an end goal and must be increased to improve the accuracy of assessments of target stocks and species caught in association with fishing and allow for the Commission to determine whether members are complying with their obligations. The Secretariat's paper ([TCC19-2023-11](#)) provides numerous examples of

obligations for which a lack of independent data on longline fishing impedes the assessment of compliance.

- **Agree on a plan to develop electronic monitoring standards.** Electronic monitoring (EM) is key to improve the data collection and transparency in the fisheries the Commission oversees but work on developing EM standards has stalled. To restart this process and ensure an EM program is adopted without delay, the Commission should request that the Electronic Reporting and Electronic Monitoring Intersessional Working Group present WCPFC in 2024 with proposals to establish EM standards and an EM program. The Commission should fund an in-person meeting of the working group next year.

***Extend the Compliance Monitoring Scheme (CMS) and complete the list of 'future work'.***

A robust CMS is essential to ensure members are accountable for meeting their obligations, identifying capacity needs, highlighting where measures need to be amended, and supporting sustainable fisheries. **The Commission should renew the CMS without an end date, sending a powerful message that compliance is a lasting priority and avoiding protracted and recurring discussions over the measure's continuation.**

The Commission also should continue to make progress on its list of 'future work' for the CMS, in recognition that aspects of the measure need improvement. As a guide, we urge members to review the principles of effective compliance processes in the paper "[Approaches to Evaluate and Strengthen RFMO Compliance Processes – A Toolkit and Recommendations](#)," which was presented to TCC in 2022. **As such, the Commission should complete more tasks in its list to improve the CMS, including:**

- **Finalizing the remaining audit points to clarify obligations for assessment.** WCPFC should agree that the TCC-reviewed list of audit points should be used in compliance assessments and members should commit themselves to finalizing the remaining batch in Rarotonga. The Commission should adopt a requirement that future proposals for CMMs include specific audit points to be assessed.
- **Developing 'corrective actions' to enhance compliance.** WCPFC should adopt the proposed terms of reference to initiate the corrective actions work and encourage members to participate. This work should include a focus on actions to correct non-compliance and supportive actions to enhance all members' capacities to implement their obligations.
- **Adopting guidelines for observers to participate in meetings that review members' compliance monitoring reports.** Providing for observer participation in these closed sessions was agreed as a priority task to enhance the CMS. A set of [guidelines](#) is already available, including suggestions from non-governmental organizations, and should be adopted.

Finally, we are concerned by any proposal that would weaken the CMS by reducing the number of observer reports that can be reviewed each year, which would seriously reduce the

Commission's ability to identify and address instances of non-compliance. **We call on members to reject any proposal that would decrease the effectiveness of the CMS and instead focus on improving the process for all parties.**

*Monitor the implementation of port State measures to strengthen CMM-2017-02 and deter illegally caught fish from entering the market.*

Adopting effective port State measures (PSMs) is a cost-effective way to minimize the risk of illegally caught fish entering international markets. WCPFC adopted a conservation and management measure on minimum standards for port State measures in 2017. The Technical and Compliance Committee (TCC) recommended the measure be reviewed in 2024, taking into account its implementation, other RFMOs' experience, the UN FAO's Port State Measures Agreement (PSMA) and the Pacific Islands Forum Fisheries Agency regional PSM framework.

**The Commission should support a TCC review of the port State measure CMM in 2024.** This would be the first review of the measure since its adoption and should provide an opportunity for members to exchange information about their in-port monitoring processes and identify ways to better achieve the proper monitoring of port activities and deterrence of IUU fishing.

*Improve management of billfish and sharks.*

Several shark and billfish species account for significant shares of non-tuna catch in WCPFC fisheries and are experiencing severe declines in their populations. Developing limit reference points for these species is urgently needed. This year, the Scientific Committee requested advice from the Commission on whether it is acceptable to have a greater level of risk and lower biomass for billfishes when compared to the equivalent values of limit reference points for target species. We do not believe that would be appropriate. **Therefore, as a step to improving management, the Commission should recommend development of suitably protective limit reference points for billfishes and sharks that are no less precautionary than those for target species.** This move would be consistent with the WCPF Convention and would give the Scientific Committee a helpful response to guide its work on these vulnerable, non-target species.

*Impact of other international treaties.*

Recent developments in international treaties including the World Trade Organization Subsidies Agreement and BBNJ will interact with RFMOs. WCPFC should consider if or how it can assist members who are signatories to these treaties in meeting their obligations. We also urge WCPFC members to sign both agreements, which would improve the management of international fisheries.