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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 21st 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 SC20, NC20, TCC20, and WCPFC20. 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

Because of the importance of this issue to monitoring and compliance, and the ongoing failure of the WCPFC to make significant progress, 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.[1] Furthermore, observers play an indispensable role in monitoring and documenting compliance with very important CMMs in the WCPO.[2] 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.[3] 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.[4] 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 18 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.[5] 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:[6]

- 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.[7] 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

Recent efforts by the Pacific Community to standardise observer coverage data indicate that region-wide observer coverage is barely above 5%.[8] 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[9] or compliance objectives.[10]

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."[11] 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.

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. Moreover, where high rates of observer coverage have been implemented through electronic means, reporting from those vessels has improved dramatically, further improving data quality and quantity.[12] 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.[13]

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 is encouraged to hear that most CCMs are meeting their obligations under CMMs 2017-03 and 2018-05 to ensure the safety and security of fisheries observers, but note that there are still improvements needed for some CCMs. 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 like to note that as shipboard wireless becomes increasingly accessible it must not be considered a replacement or alternative for the existing CMM requirements because shipboard wireless signals are only accessible within a specific range from the vessel while satellite signal access is not limited and could mean the difference between life and death in the event of a vessel fire or sinking.

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:

- **Adopt robust Electronic Monitoring Minimum Standards that meet observer data collection requirements to the maximum extent practicable;**
- **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 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 WCPFC21 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 also supports conducting further research of YFT and SKJ stock structure in the archipelagic waters of Regions 5 and 2 to better understand connectivity and stock dynamics across the WCPO, which will better inform the implications of certain HS elements, noting that approximately 40% of YFT, including a high proportion of juveniles, are caught across this region.

WWF requests that WCPFC21 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.[14]

Therefore, WWF encourages WCPFC21 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);**

- **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.**

Transhipment Monitoring

WWF expresses deep disappointment that revisions to CMM 2009-06 Transhipment could not be agreed at last year's WCPFC20. Transhipment remains one of the most prominent weaknesses in catch documentation and verification that leads to Illegal, Unreported, and Unregulated (IUU) catch in the WCPO.[15] WWF again notes that the most simple, efficient, and effective solution to the challenges of transhipment-related IUU is to simply prohibit all at-sea transhipment 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 transhipment is politically unlikely, WWF supports substantial reforms and improvements for all at-sea transhipments, including:

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

WWF would like to specifically note that the transhipment 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 transhipment activity.[16] Globally, 130 carrier vessels are responsible for more than 70% of RFMO-related transhipment activities. Moreover, the vast majority of transhipments occur between China and Panama according to a recent study.[17]

Additionally, claims of impracticability in the WCPFC continue to be undermined in the recent Annual Report on Transhipment Reporting presented to TCC20.[18] The Annual Report continues to indicate that transhipment remains the rule rather than the exception among some fleets, with as much as a third of the albacore and bigeye tuna catch and a quarter of yellowfin subject to transhipment outside the Convention Area where transhipment data is not verified and subject to inconsistent observer practices and vessel practices that negatively affect data quality, so it is not a small proportion of catch that is not being adequately monitored or managed.[19] Additionally, analysis suggests that unaccounted and unauthorised transhipment is occurring between longline vessels, emphasising both the need for improved monitoring through observer coverage as well as additional research into the practice.[20] Furthermore, evidence continues to 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.[21]

WWF also specifically notes the findings of WCPFC20-2023-18 which concluded that "reliance on self- reported data and 5% longline observer coverage deleteriously impacts the Commission's decisions, highlighting the need for independent verification."[22] The analysis further highlighted data

gaps and quality issues as well as ways to strengthen data for the Commission and CCMs. WWF further highlights the robust analysis submitted by the Republic of Marshall Islands, which not only reiterated deficiencies in transhipment monitoring, but also emphasised contradictions in fuel cost to distance ratios used to justify impracticability.[23] Moreover, findings of that study suggest repeated port avoidance by many vessels licensed to fish in the waters of some FFA members that suggests that decisions to favour high-seas transhipment over port calls are made for groups of vessels, which indicates a violation of CMM-2009-06 to determine impracticability on a vessel basis.[24]

In short, every analysis to date has concluded that current practices under CMM 2009-06, a measure that has been in place for 15 years and failed in its principal task to ensure that transhipment remain the exception rather than the rule, is wholly insufficient and must be improved.

Lastly, consistent with findings in WCPFC20-2023-18 that suggest high incidence of unreported transhipment, WWF also recommends that transhipment requirements be buttressed by verification and validation of transhipment activities through redundant systems such as the use of a vessel monitoring system (VMS) supplemented by an operating automated identification system (AIS) or through an independent EM system. WWF also believes that EM should be prioritised for transhipment to assist some of the verification and validation deficiencies identified in WCPFC20-2023-18. This should be further complemented by proposed proximity alerts in the WCPFC VMS system. If, through investigation of suspected unreported transhipment activity, supporting procedures and technologies indicate that transhipment activity was conducted in violation of transhipment rules, the offending vessel should be subject to sanctions including removal from good standing, license revocation, and listing on the IUU vessel list.

WWF recommends the WCPFC:

- **Support 100% observer coverage on delivering and receiving vessels engaged in at-sea transhipment;**
- **Prioritise the development and application of EM for transhipment monitoring; and**
- **Support or endorse the use of technology to verify and validate transhipment 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. We agree strongly with the FFA members that improving crew labour standards and the passage of a binding CMM focussing on crew labour standards remains a key priority and we note the strong support for adoption of this CMM expressed by nearly all CCMs at WCPFC20.

We note that while crewing agencies remain a challenge that needs to be urgently addressed at the national level where those entities operate by their respective national governance frameworks, the legal and jurisdictional framework for addressing labour conditions onboard fishing vessels unequivocally places the responsibility on the flag state under art 94(1) and art 94(3) of the United Nations Convention

on the Law of the Sea ('UNCLOS').[25] In short, the flag state bears the primary responsibility to ensure the safety and welfare of crew operating under that flag under the applicable international instruments.

However, WWF continues to believe 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 serious 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'[26] and is reflected in proposed language from WWF in the current CMM proposal.

WWF recommends the WCPFC:

- **Insist on the inclusion of a recordkeeping and reporting requirement for all serious 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 previous 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) likely remain overfished and experiencing overfishing and silky sharks (FAL), while the recent stock assessment indicates modest improvement, remains subject to overfishing, high levels of fishing pressure, and substantial data uncertainty. However, WWF maintains significant 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 again raise the issue of continued shark finning[27] in the WCPO longline fleet and the need to tighten requirements in CMM 2022-04 to ensure shark finning does not occur. We continue to 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. As fully evidenced by the paper presented by Canada at TCC20, the alternative measures in CMM 2022-04 create substantial loopholes that prevent or inhibit adequate monitoring and compliance.[28] As that analysis demonstrates, 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

The Pacific Bluefin Tuna (PBF) Working Group of the International Scientific Committee for Tuna and Tunalike Species in the North Pacific Ocean (ISC) completed a baseline assessment in 2024 (SAC-15 INF-N). The ISC determined the PBF population reached the second recovery target of 20%SSBF=0 in 2021, 13 years earlier than initially planned. The Working Group is also carrying out a Management Strategy Evaluation (MSE) scheduled for completion in 2025.

Although the Pacific bluefin tuna stock recovered to the rebuilding target, WWF maintains deep concerns regarding the continued health of the Pacific bluefin tuna stock and remains committed to restoring and rebuilding this ecologically, sociologically, and economically important fishery resource.

Additional data suggest that recent recruitment continues to be larger than assumed in the low-recruitment scenario used for previous projections conducted by ISC. For these reasons, WWF suggests the WCPFC take a precautionary approach to maintain and further rebuild this stock by prioritising the adoption of a robust precautionary harvest strategy to avoid any reversal of the current trend.

WWF recommends that the WCPFC:

- **Urgently prioritise MSE development and establish a precautionary HS with appropriate Limit and Target Reference Points for PBF by 2025;**
- **Allow no further increase in catch quotas unless each member country confirms they will adopt the MSE in 2025; any increase from current catch levels must be underpinned by scientific advice and ensure the increasing stock abundance trend is preserved, and**
- **Develop a Catch Documentation Scheme (CDS) for the thorough monitoring of PBF to ensure proper stock assessment and reduce IUU fishery risk by 2025.**

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[1] *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.
[2] *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.
[3] The Convention on the Conservation and Management of Highly Migratory Fish Stocks in the Western Pacific Ocean (WCPF 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.
[4] *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…").
[5] 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]
[6] WCPFC, Status of Observer Data Management, SC20-ST-IP-03 Status of Observer Data Management, at 20, Table 4 (Sept. 4, 2024).
[7] 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.")
[8] *Supra note 6* at 20-23, Tables 4, 5, and 6. (Sept. 4, 2024).
[9] *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 Billifsh, 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.
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[11] Gilman, Eric & Zimring, Mark. 2018. Meeting the objectives of fisheries observer programs through electronic monitoring. 10.13140/RG.2.2.28000.99846.
[12] *See* Timothy J. Emery, T.J. *et al*, Changes in logbook reporting by commercial fishers following the implementation of electronic monitoring in Australian Commonwealth fisheries, Marine Policy, Volume 104, 2019, Pages 135-145, ISSN 0308-597X, https://doi.org/10.1016/j.marpol.2019.01.018.; *See also* Christopher J. Brown, C.J., *et al*, Electronic monitoring for improved accountability in western Pacific tuna longline fisheries, Marine Policy, Volume 132, 2021, 104664, ISSN 0308-597X, https://doi.org/10.1016/j.marpol.2021.104664.
[13] Leading Environmental NGOs Stand Together to Call for 100% Observer Coverage on Industrial Tuna Fishing Vessels (June 29, 2019) *retrievable at* https://www.prnewswire.com/news-releases/leading-environmental-ngos-stand-together-to-call-for-100-observer-coverage-on-industrial-tuna-fishing-vessels-300873686.html.
[14] *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.
[15] *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.
[16] *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.
[17] *Id*.
[18] WCPFC, Annual Report on WCPFC Transhipment Reporting, WCPFC-TCC20-2024-RP03, (September 19, 2024).
[19] *Id* at 1.
[20] *Id* at 45, *Figure* 34.
[21] *Id* at 50, *Figure* 39.
[22] WCPFC, Information and Data Requirements to Support Management Decisions for SP Albacore, Skipjack, Bigeye and Yellowfin Tunas, WCPFC20-2023-18, at 5 (Sept. 4, 2024).; *See also* WCPFC, Summary Report, WCPFC20_Rev01 Summary Record, at 92-93 (Sept. 4, 2024).
[23] WCPFC, A framework to evaluate the economic hardship implications of high-seas transhipment activities in the Western Central Pacific Ocean – Full Study, WCPFC-TCC20-2024-DP07, at 33 (Sept. 16, 2024)
[24] *Id* at 5.
[25] *United Nations Convention on the Law of the Sea*, opened for signature 10 December 1982, 1833 UNTS 397 (entered into force 16 November 1994) arts 94(1), (3) ('UNCLOS').
[26] *See* International Maritime Organization (IMO). Casualties. (November 3, 2023), https://www.imo.org/en/OurWork/MSAS/Pages/Casualties.aspx.
[27] *See* Boris Worm *et al*, Global shark fishing mortality still rising despite widespread regulatory change. Science 383,225-230 (2024). DOI:10.1126/science.adf8984; *see also* One News New Zealand, Five Indonesian men guilty of illegal shark fin fishing near Darwin, (05 Aug 2024) https://www.1news.co.nz/2024/08/05/five-indonesian-men-guilty-of-illegal-shark-fin-fishing-near-darwin/.; The Maritime Executive, Canadian Fishery Patrol Turns Up 3,000 Illegal Shark Fins, (05 Oct 2023), https://maritime-executive.com/article/canadian-fishery-patrol-turns-up-3-000-illegal-shark-fins.
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