

TECHNICAL AND COMPLIANCE COMMITTEE

Twenty-First Regular Session 24 September to 30 September 2025 Pohnpei, Federated States of Micronesia (Hybrid)

STATEMENT TO TCC21

WCPFC-TCC21-2025-OP01 10 September 2025

Submitted by Birdlife International

BirdLife International Statement to the 21st session of the WCPFC Technical and Compliance Committee (TCC21)

September 23rd – 30th, 2025, Pohnpei, FSM.

BirdLife International thanks the WCPFC Secretariat for preparations of the 21st meeting of the Technical and Compliance Committee (TCC21). We are grateful for the opportunity to participate in the important discussions on the technical and compliance obligations of the Members of the WCPFC to manage this globally important fishery.

BirdLife International urges the TCC21 to adopt and implement robust, scientifically evidenced measures to address the critical decline of seabird populations in the Western and Central Pacific Ocean (WCPO) impacted by commercial pelagic longline fisheries. We stress that the TCC has a responsibility, under Article 10(c) of the WCPFC Convention, to adopt conservation and management measures for non-target species with a view to maintaining or restoring their populations.

Despite existing CMMs and monitoring efforts, there are **ongoing challenges with compliance regarding** seabird mitigation measures, particularly the use and specification of tori-lines:

- The Annual Report on HSBI Scheme (<u>WCPFC-TCC21-2025-RP04</u>) indicated that tori-lines for mitigating seabird capture were regularly non-compliant and rarely used based on feedback from CCMs during 2024-2025.
- Operation NASSE 2025 identified five vessels as potentially non-compliant with seabird mitigation measures, including tori-line minimum specifications (CMM 2018-03). These vessels were also noncompliant with CCSBT obligations due to the presence of Southern Bluefin Tuna.

RECOMMENDATIONS

1. Recommend proposed changes in TCC21-2025-DP04:

BirdLife International thanks Japan for this paper and support moving elements like mainline length, streamer swivels, and streamer colour to the technical guidelines, while strengthening minimum standards to include clearer operational practices such as landing baited hooks close to the tori-line coverage area and maintaining tori pole height to ensure sufficient aerial extent. This approach can improve mitigation performance while offering operational flexibility to operators and contribute to improved compliance.

2. Mandate effective Mitigation Measures:

BirdLife International support ACAP's Best Practice Advice for seabird bycatch mitigation is the most effective way to minimise seabird mortality. In consideration to discussions on practical implementation and research presented to the SC20 and SC21, we note that 2/3 measures are effective IF implemented consistently and effectively. We recommend that the TCC21 should require at least 2/3 mitigation measures south of 25°S (which are critical areas for vulnerable albatrosses and petrels) and urgently improve compliance monitoring and verification of reporting.

3. Significantly increase independent and robust observer coverage:

BirdLife International reiterates the **urgent need for drastically increasing observer coverage to a minimum of 20%** on the longline fleet. Current levels of 5% are insufficient for effective bycatch management and for understanding fisheries impacts to threatened species.

ALBATROSS AND PETREL CONSERVATION CRISIS

BirdLife International reminds the TCC that the conservation status of seabirds in the WCPFC Convention Area is critical and worsening (Figure below). Many albatross and large petrel species are experiencing significant, long-term, and ongoing population declines. Specifically, the Gibson's Albatross and Southern Buller's Albatross, endemic to New Zealand, predominantly forage within the WCPFC Convention Area and are highly susceptible to bycatch in pelagic longline fisheries. Both populations are currently declining: the Gibson's Albatross population has seen a sustained annual decline of 5.7% from 2005 to 2020, with recent data suggesting a renewed decline from 2016. Similarly, the Southern Buller's Albatross population has experienced a significant decline in recent years. The Antipodean Albatross, faces a risk of global extinction by 2070 if current threats are not addressed, having declined 62% since 2004 and continuing to fall by 6% annually.

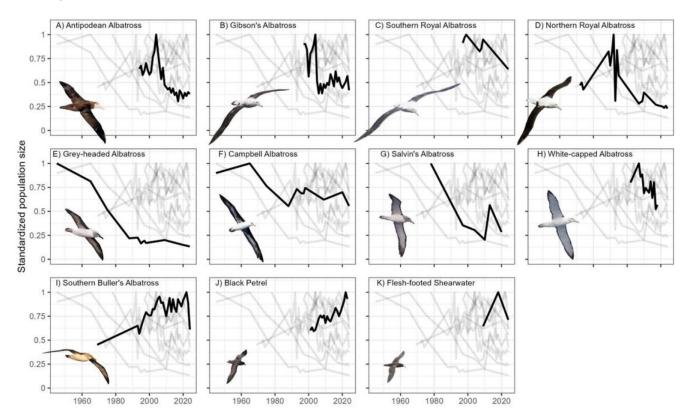


Figure from SC20-EB-WP-10: Standardized population trajectories for the entire monitoring period available for the 11 focal taxa. Black lines represent the trajectory of the focal taxon per panel; translucent lines represent other taxa.

BirdLife International reminds the TCC that bycatch in pelagic longline fisheries is a primary driver of these population declines (Figure below). Estimates suggest that between 11,000 and 25,000 seabirds were killed annually in the WCPFC Convention Area during 2015-2018, with 4,000-4,600 of these being albatrosses and petrels caught south of 25°S. Fine-scale overlap analyses show that 80% of tracked Gibson's Albatross and 75% of Southern Buller's Albatross overlapped with pelagic longline fishing effort. This overlap occurred almost exclusively within the WCPFC Convention Area. The Gibson's Albatross, the more threatened and steeply declining of the two taxa, exhibited considerable overlap with High Seas fishing effort between 25°S and 30°S, with 20% of bird hours in this area overlapping with fishing vessels.

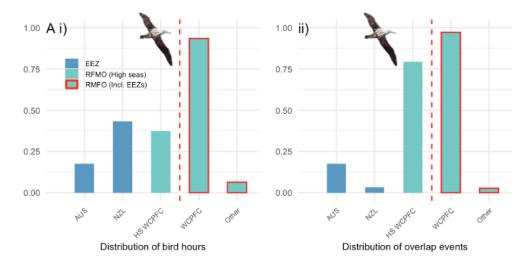


Figure from <u>SC21-EB-IP-09</u>: Distribution and overlap with commercial pelagic longline vessels for **A)** Gibson's and **B)** Southern Buller's Albatross.

COMPLIANCE WITH SEABIRD MITIGATION REGULATIONS

BirdLife International welcomes improved data reported on bycatch rates and mitigation measres used by Members. These data increases our ability to undertsand bycatch impacts on seabird populations and the efficacy of mitigation measures.

- BirdLife are appreciative of the efforts by **Vanuatu** to improve observer coverage and implementation of mitigation measures on their flagged vessels and are now reporting on seabird mitigation measures.
- BirdLife notes that China reported a black-footed albatross caught 25°-30° South, however, it is likely
 this is a misidentification. BirdLife would be happy to work with China on a seabird identification guide
 to assist their observers to make correct idenfications.
- BirdLife notes that **Chinese Taipei** have some errors in calculations in Tables 9-12 of their Annual Report. We have queried these and appreciate a response in regards to these errors.
- BirdLife congratulate New Zealand on the implementation of fleetwide electornic monitoring, we look forward to their contribution of verifiable data reporting on bycatch species, as agreed by all parties of the Commission.
- BirdLife are pleased to see the **United States** now reporting bycatch, observer coverage and mitigation use by spatial area as per the data reporting requirements under CMM2018-03.

BirdLife International also highlight that the SC has consistently cited a lack of sufficient data, largely due to limited ROP observer coverage in longline fisheries, that prevents the provision of reliable bycatch estimates. Observer reports highlight issues such as inaccurate recording of species in vessel logs, inaccuracies in recording retained and discarded bycatch species, and potential underestimation of captures, all of which affect the quality and completeness of bycatch data. The limited and at times **inconsistent observer coverage directly impedes the Commission's ability to monitor and verify compliance**, understand the scale of seabird bycatch, and assess the effectiveness of mitigation measures. BirdLife International urges the TCC21 to make progress on addressing this ongoing issue.

Table 1: Bycatch mitigation compliance in 2018 -2023. Years and areas where the CCM failed to meet the 5% observer coverage, thus where reported interactions with seabirds are unreliable, are highlighted in red.

Country	Year	Observed effort (% of total hooks)	Has mitigation use been reported according to area fished?	South of 30°S (% observed effort using 2/3 mitigation measures)		observed effort using 2/3	Total observed birds caught (+ Fisher reported when included
Australia	2018	11.2 (south of 30 ° S) 10.2 (30 °S-25 °S) 11.2 (25 °S-23 °N)	No	100	100		14
	2019	12.1 (south of 30 ° S) 12 (30 °S-25 °S) 10.9 (25 °S-23 °N)	No	100	0	N/A	11 + 101
	2020	9.8 (south of 30°S) 10.2 (30°S-25°S) 9.8 (25°S-23°N)	No	100	0	N/A	11 + 42
	2021	9.9 (south of 30° S) 10.2 (30°S-25°S) 9.5 (25°S-23°N)	No	100)	N/A	10 + 58
	2022	9.6 (south of 30° S) 10.2 (30°S-25°S) 10 (25°S-23°N)	No	100		N/A	10 +71
	2023	8.9 (south of 30° S) 9.4 (30°S-25°S) 9.9 (25°S-23°N)	No	100		N/A	4 + 49
	2024	8.9 (south of 30° S) 9.4 (30°S-25°S) 9.9 (25°S-23°N)	No	100		N/A	15
China	2018	3.48 (south of 30° S) 4.59 (23°N-30°S) 15.15 (north of 23° N)	No	Unknown	Unknown	Unknown	7
	2019	0 (south of 30°S) 6.3 (23°N-30°S) 15.15 (north of 23°N)	No	Unknown	Unknown	Unknown	6
	2020	8.97 (south of 30° S) 9.19 (23°N-30°S) 0 (north of 23° N)	Yes	100	100	100	6
	2021	9.42 (south of 30 ° S)	Yes	100	100	100	0



ERNATIONAL	nat	ure and people					
		7.06 (23°N-30°S) 0 (north of 23°N)					
	2022	39.33 (south of 30 ° S) 0 (23 °N-30 °S) 6.41 (north of 23 ° N)	Yes	100	100	100	0
	2023	12.94 (south of 30°S) 10.28 (23°N-30°S)	Yes	100	100	NA	23
	2024	40.11 (south of 30°S) 6.33 (23°N-30°S)	Yes	100	100	NA	0
Chinese Taipei	2018	3.6 (south of 30 ° S) 5.1 (30°S-25°S) 6.4 (north of 23 ° N)	Yes	93.6	100	87.6	14
	2019	6 (south of 30 ° S) 12.5 (30 ° S-25 ° S) 5.3 (25 ° S-23 ° N) 2.6 (north of 23 ° N)	Yes	70	91.1†	87.5	21
	2020	6.5 (south of 30 ° S) 9.8 (30 °S-25 °S) 4.7 (25 °S-23 °N) 5.3 (north of 23 ° N)	Yes	59.1	100	97	46
	2021	6.3 (south of 30 ° S) 6.6 (30 °S-25 °S) 6.9 (25 °S-23 °N) 5.2 (north of 23 ° N)	Yes	90	100	98.7	10
	2022	10.7 (south of 30 ° S) 2.6 (30°S-25°S) 6.5 (25°S-23°N) 5.3 (north of 23 ° N)	Yes	93.5	100	100	99
	2023	3.6 (south of 30 ° S) 4.4 (30 °S-25 °S) 3.9 (25 °S-23 °N) 0.5 (north of 23 ° N)	Yes	71.3	4.4	0.5	10
	2024	3.6 (south of 30 ° S) 4.4 (30 °S-25 °S) 3.9 (25 °S-23 °N) 0.5 (north of 23 ° N)	Yes	100	100	72.7	54
Japan*	2018§	2.4 / NA (south of 30 ° S)	No	Unknown	Unknown	Unknown	Unknown



ERNATIONAL	Hace	are and people					
Vessels		4.0 / 3.1 (30°S-23°N)	(3.7% compliant across				
>20GRT/<20GRT		2.8/ 1.7 (north of 23 ° N)	all areas)				
		17.9 / NA (south of 30 ° S)					
	2019§	19.5 / NA (30°S-25°S)	Yes	42	6.4	74.8	1665
	20133	4.0 / 3.9 (25°S-23°N)	163	72	0.4	74.0	1005
		3. 4 / 3.2 (north of 23 ° N)					
		5.5 / NA (south of 30 ° S)					
	2020	8.5 / NA (30°S-25°S)	Yes	76.5	Unknown	5.4	Unknown
	2020	0 / 0.4 (25°S-23°N)	163	7 0.3	OTHER OWN	3.1	OTHERIOWIT
		0 / 0.1 (north of 23 ° N)					
		0 / NA (south of 30 ° S)				Unknown	
	2021	0.4 / NA (30°S-25°S)	Yes	Unknown	Unknown		Unknown
		0 / 0 (25°S-23°N)					
		0 / 0 (north of 23 ° N)					
		0 / NA (south of 30 ° S)			Unknown	Unknown	
	2022	0 / NA (30°S-25°S)	Yes	Unknown			Unknown
		0 / 0 (25°S-23°N)					
		0 / 0 (north of 23 ° N)					
		13.4 / NA (south of 30 ° S)	Yes	76.9	69.6	87.0	
	2023	14.9 / NA (30°S-25°S) 3.7 / 3.6 (25°S-23°N)					403
		5.3 / 2.2 (north of 23 ° N)					
		16.8 / NA (south of 30 ° S)					
		26.1 / NA (30°S-25°S)	Yes			94.2	
	2024	3.8 / 2.1 (25°S-23°N)		96.07	92.21		273
		2.0 / 2.0 (north of 23 ° N)					
New Zealand	2018	13.1 (south of 30 ° S)	Yes	95	N/A	N/A	98
	2019	8.4 (south of 30 ° S)	Yes	100	N/A	N/A	56
	2020	9.9 (south of 30 ° S)	Yes	97.8	N/A	N/A	24
	2021	11.7 (south of 30 ° S)	Yes	93	N/A	N/A	53
	2022	5.4 (south of 30 ° S)	Yes	93	N/A	N/A	60
	2023	3.2 (south of 30 ° S)	Yes	100	N/A	N/A	19
	2024	88.2 (south of 30 ° S)	Yes	100	N/A	N/A	319
USA*	2018	20.4 (across all areas)	No	N/A	N/A	100	249
	2019	21.03 (across all areas)	No	N/A	N/A	100	226
	2019	18.4 (north of 23 ° N)	Yes	N/A	N/A	100	681
	2020	10.4 (11011110123 14)	165	IN/ A	IN/A	100	001



	2021	21.9 (north of 23 ° N)	Yes	N/A	N/A	100	688
	2022	25.2 (north of 23 ° N)	Yes	N/A	N/A	100	709
	2023	19.4 (north of 23 ° N)	Yes	N/A	N/A	100	269
	2024	17.2 (north of 23 ° N)	Yes	N/A	N/A	100	160
Vanuatu	2023	1.00 (across all areas)	No	N/A	N/A	N/A	249
	2024	6.00 (across all areas)	Yes	100	100	22	226

^{*} Reports effort north of 23° N and 23° N – 30° S areas combined, only reported for Hawai'i fleet.

[§] Japan report no mitigation use in the 25°N – 30°S area because bycatch mitigation requirements for this area came into force in January 2020 under CMM 2018-03.

Table 2. Effort observed and reported seabird captures in 2018 - 2023 [South of 30°S]. Non-compliant observer coverage rates are in red.

		_	Fishing effort	Observed se			
Country	Year	Number of vessels	Number of hooks ('000s)	% hooks observed	Capture number	Capture rate (birds/1000 hooks)	Raised Mortalities
Australia	2018	37	3084	11.2	8	0.02	71
	2019	33	2537	12.1	8	0.03	66
	2020	30	1721	9.8	9	0.01	9
	2021	30	1890	9.9	7	0.00	8
	2022	31	2071	9.70	3	0.02	31
	2023	28	2338	8.9	4	0.01	23
	2024	30	2838	10.1	7	0.024	68
China	2018	19	5025	3.48	Unknown	Unknown	Unknown
	2019	22	2312	0	Unknown	Unknown	Unknown
	2020	26	3121	9.42	1	0.00	9
	2021	23	6511	8.97	0	0.00	0
	2022	52	2286	39.33	0	0.00	0
	2023	47	572	12.94	0	0.00	0
	2024	6	187	40.11	0	0.00	0
Chinese Taipei	2018	44	6508	3.6	0	0.00	0
	2019	41	9577	6.0	7	0.01	125
	2020	58	10172	6.5	4	0.01	81
	2021	38	4852	6.3	1	0.00	15
	2022†	21	5394	10.7	3	0.01	27
	2023	22	6061	3.6	8	0.04	224
	2024	22	6061	4.1	0	0.00	Unknown
Japan	2018	27	7003	2.4*	37	0.22	1520
(vessels > 20	2019	27	5388	17.9	1140	1.19	6385
GRT)	2020	21	3705	5.5	13	0.063	236
	2021	23	4036	0.0	Unknown	Unknown	Unknown
	2022	22	2476	0.0	Unknown	Unknown	Unknown
	2023	24	3675	14.5	46	0.086	317
	2024	20	3017	16.8	13	0.026	78
New Zealand	2018	33	2233	13.1	98	0.34	750
	2019	28	1978	8.4	56	0.34	671
	2020	28	1949	9.9	24	0.12	242
	2021	28	1535	11.7	53	0.30	454
	2022	22	1271	5.4	60	0.87	1107
	2023	20	1591	3.2	19	0.37	595
	2024	20	1570	88.2	316*	0.201*	316*

^{*}Observer coverage may be low due to some data having been removed.

[†] Preliminary data

^{*} Fisher reported data only

Table 3. Fishing effort observed and reported seabird captures 2018- 2023 [between 25°S - 30°S]. Non-compliant observer coverage rates are in red.

			Fishing effor	Observed se	Observed seabirds hooked		
Country	Year	Number of vessels	Number of hooks ('000s)	% hooks observed	Capture number	Capture rate (birds/1000 hooks)	Raised Mortalities
Australia	2018	27	2,917	10.2	5	0.017	50
	2019	26	3,264	12.0	3	0.008	26
	2020	22	3,990	10.2	2	0.005	20
	2021	21	2,607	10.2	1	0.004	10
	2022	22	2,583	9.3	6	0.025	65
	2023	21	3,386	9.4	2	0.006	20
	2024	22	3,613	9.5	8	0.023	83
China*	2018	335	140,011	4.59	1	0.00015	21
	2019	339	159,311	6.3	6	0.0006	96
	2020	349	152,900	7.06	5	0.00046	70
	2021	308	140,511	9.19	0	0	0
	2022	263	122,494	6.41	0	0	0
	2023	335	86,500	10.28	23	0.00259	224
	2024	324	146,299	6.33	2	0.00022	322
Chinese Taipei	2018	61	11982	5.1	5	0.008	96
	2019	45	6637	12.5	11	0.013	86
	2020	99	15393	9.8	0	0	0
	2021	38	4672	6.6	1	0.003	14
	2022	27	3776	2.6	0	0	Unknown
	2023†	27	3326	4.4	0	0	Unknown
	2024	27	3326	3.4	0	0	Unknown
	2018*	154	20,655	3.1	7	0.011	227
Japan (Vessels >	2019	9	844	19.5	4	0.0005	0
(vessels > 20GRT)	2019	9	844	4	4	0.005	4
20GKT)	2020	14	1563	8.5	0	0	0
	2021	12	938	0	Unknown	Unknown	Unknown
	2022	9	702	0	Unknown	Unknown	Unknown
	2023	11	995	14.9	1	0.007	7
	2024	10	1308	26.1	0	0.00	0
	2018	-	-	-	-	-	-
Japan	2019	148	13940	3.9	1	0.001	21
(Vessels <	2020	130	16083	0.4	2	0.039	500
20GRT)	2021	114	13849	0	Unknown	Unknown	Unknown
23°N – 25°S	2022	124	13847	0	Unknown	Unknown	Unknown
only	2023	114	15083	3.6	3	0.006	83
	2024	105	15891	2.1	0	0.00	0

^{*} Combined data for $23^{\circ}N - 25^{\circ}S$ and $25^{\circ}S - 30^{\circ}S$

[†] Preliminary data

Table 4. Fishing effort observed and reported seabird captures in 2018 – 2023 [North of 23°N]. Non-compliant observer coverage rates are in red.

		=	Fishing effort	•	Observed seabirds bycau		ght
Country	Year	Number of vessels	Number of hooks ('000s)	% of hooks observed	Capture number	Capture rate (birds/1000 hooks)	Raised Mortalities
China	2018	10	779	15.15	6	0.05	39
	2019	9	144	8.33	0	0	0
	2020	10	745	0	0	0	0
	2021	17	959	0	unknown	unknown	unknown
	2022	9	183	0	unknown	unknown	unknown
	2023	0	0	0	0	0	0
	2024	0	0	0	0	0	0
Chinese Taipei	2018	521	26173	6.4	5	0.003	79
	2019	603	31792	2.6	2	0.002	64
	2020	205	28843	5.3	46	0.03	865
	2021	109	16724	5.2	59	0.068	1137
	2022	122	18134	5.3	88	0.092	1668
	2023†	161	23315	0.5	0	0	0
	2024	161	23315	4.4	54	0.067	1562
	2018	36	11842	2.8	61	0.186	2203
Japan (Vessels >	2019	36	11239	3.4	83	0.223	2506
20GRT)	2020	42	13724	0	Unknown	unknown	unknown
20011)	2021	37	11624	0	Unknown	unknown	unknown
	2022	33	9669	0	Unknown	unknown	unknown
	2023	24	11402	5.3	150	0.247	2,830
	2024	25	10409	2.0	17	0.082	850
Japan	2018	209	50681	1.7	55	0.064	3244
(Vessels <	2019	208	49639	3.2	437	0.278	13,800
20GRT)	2020	216	46726	0.1	28	0.703	28,000
	2021	189	34350	0	Unknown	unknown	unknown
	2022	212	35658	0	Unknown	unknown	unknown
	2023	196	43311	2.2	208	0.216	9,455
	2024	195	53947	2.0	242	0.221	12,100
LICA	2018*	142	54630	20.5	192	0.02	1093
USA (Hawai'i only)	2019*	137	19732	17.6	166	0.05	987
(Hawai i Olliy)	2020	142	26330	18.4	148	0.03	790
	2021	137	23689	21.9	159	0.03	801
	2022	131	20533	25.2	201	0.04	821
	2023	139	25305	19.4	77	0.02	506
	2024	144	22010	17.2	99	0.03	660

^{*} Reports effort north of 23° N and 23° N $-\,30^\circ$ S areas combined.

[†] Preliminary data