



TECHNICAL AND COMPLIANCE COMMITTEE

Twenty-First Regular Session

24 September to 30 September 2025

Pohnpei, Federated States of Micronesia (Hybrid)

CONSULTATION PAPER ON LONGLINE AT-SEA TRANSHIPMENT

WCPFC-TCC21-2025-DP15

26 September 2025

Submitted by Republic of Korea

Consultation Paper on Longline At-Sea Transshipment

Republic of Korea

Explanatory Note

The Republic of Korea appreciates the concerns raised by the Republic of the Marshall Islands on transshipment in WCPFC-TCC21-2025-DP12. However, it is important to clarify that **longline at-sea transshipment and IUU fishing are not inherently connected**. IUU activity results from deliberate non-compliance and poor control of the flag state, not from the practice of transshipment itself.

Longline at-sea transshipment, when conducted in accordance with WCPFC obligations and flag State authorizations and control, is a **legitimate and internationally recognized practice**. The Commission for the Conservation of Antarctic Marine Living Resources (CCAMLR), for instance — which manages one of the most remote and strictly regulated areas of the ocean — permits at-sea transshipment under defined conditions. This demonstrates that the practice is fully compatible with strict conservation and compliance regimes.

The **FAO Voluntary Guidelines for Transshipment**, adopted in 2022, also explicitly recognize that at-sea transshipment can be conducted responsibly, provided appropriate regulatory frameworks are in place. Similarly, other RFMOs such as ICCAT, IOTC, and IATTC allow longline at-sea transshipment under regulation.

Against this backdrop, a unilateral prohibition in the WCPFC would create regulatory inconsistency, without directly addressing the drivers of IUU fishing. The more effective course is to ensure that existing rules are applied consistently and transparently, rather than prohibiting a practice that is both necessary and legitimate.

I. The Nature of Longline Operations

- Longline fishing differs fundamentally from purse seine fishing. Longline vessels are generally smaller, operate over vast areas for extended periods, and rely on carrier vessels to offload catch. In contrast, purse seine vessels operate in concentrated fishing grounds and are better suited to direct landings in port.
- Often, purse seine vessels tend to be much more profitable compared to longline vessels, making them much more responsive and adaptive to new and existing operational requirements including mandatory in-port transshipment. When it comes to longliners, this is not the case.
- These differences are **well recognized within WCPFC and across RFMOs**, and differential treatment between the two fisheries is evident in many areas, including observer requirements, reporting formats, and other conservation and management measures.
- Requiring all longline transshipments to occur in port would therefore not only disrupt

established operational patterns but also ignore these long-standing distinctions, leading to disproportionate impacts on one fishery sector.

II. Decoupling from IUU Fishing

- The claim that at-sea transshipment inherently promotes IUU activity oversimplifies the issue.
- Compliance risks are addressed through **implementation of existing WCPFC obligations**: advance authorization by flag States, reporting requirements, and the use of approved carrier vessels which are required to have observers on board with 100% coverage.
- The decisive factor is **whether obligations are enforced**, not whether the exchange occurs at sea or in port. Banning the practice would not eliminate IUU fishing; it would penalize compliant operators.

III. Global Norms and Consistency

- Importantly, the WCPFC Convention itself establishes in-port transshipment as a voluntary mechanism, not as an exclusive or mandatory rule. A total ban on at-sea transshipment would therefore move beyond the intent of the Convention and alter its balance of rights and obligations.
- Longline at-sea transshipment is permitted in multiple RFMOs, including ICCAT, IOTC, IATTC, and CCAMLR.
- The FAO Voluntary Guidelines further underscore that at-sea transshipment, when properly managed, is an accepted and legitimate part of modern fisheries governance.
- A total ban within WCPFC would place the Convention Area at odds with these frameworks, complicating compliance for fleets operating across different ocean basins and undermining harmonization of standards.

IV. Environmental and Operational Efficiency

- Forcing vessels to steam long distances to port for every transfer would result in **significantly higher fuel consumption and greenhouse gas emissions**.
- Such an outcome would be inconsistent with international efforts to reduce the carbon footprint of fisheries and would damage the credibility of WCPFC as a sustainability leader.

V. Economic Viability

- Economic considerations, while not the sole factor, remain critical.
- Many longline fleets are already under **intense financial pressure** due to rising fuel costs, unstable market prices, and the high cost of compliance with ever-expanding regulatory requirements. For some operators, the margin between continuing operations and exiting the fishery altogether is already razor thin.
- Imposing a ban on at-sea transshipment would not only add a substantial new cost burden but could effectively **force smaller and more vulnerable operators out of business**. This would

erode fleet diversity and further concentrate fishing effort in a handful of larger operators.

- At stake are not only commercial interests, but the livelihoods of fishing crews and coastal communities who depend on these operations for income, stability, and survival. Regulatory measures must therefore remain **proportionate, balanced, and mindful of real economic hardships**.

VI. Proposed Safeguards

Korea supports retaining longline at-sea transshipment subject to the following conditions:

1. **Prior Authorization** – All transshipments at sea to be approved in advance by the flag State.
2. **Flag State Monitoring** – Oversight through FMC systems already in place, including VMS and ERS.
3. **Authorized Carriers Only** – Transshipment restricted to carrier vessels flagged to CCMs and listed on the WCPFC Record of Fishing Vessels.
4. **Transparency Through Reporting** – Timely submission of transshipment declarations to the Secretariat.
5. **Regular Review** – Periodic Commission review of implementation to confirm continued compliance.

These conditions are proportionate, practical, and sufficient to ensure the integrity of longline at-sea transshipment.

Conclusion

Longline at-sea transshipment is a legitimate and necessary practice that supports the effective functioning of fisheries without undermining conservation and management. It is not synonymous with IUU fishing. Prohibition would introduce disproportionate costs, raise emissions, and create inconsistency with both FAO guidance and global RFMO norms, without addressing the true sources of non-compliance.

The Commission should therefore **retain the allowance for longline at-sea transshipment under current safeguards**, focusing its efforts on consistent implementation rather than prohibition.