COMMISSION
Twenty-Second Regular Session
1-5 December 2025
Manila, Philippines (Hybrid)

Position Paper to WCPFC22

WCPFC22-2025-OP22
27 November 2025

Submitted by The World Wide Fund for Nature (WWF)

22nd Regular Session of the Western and Central Pacific Fisheries Commission (WCPFC): Manila, The Philippines 01st – 05th December 2025

Introduction

The World Wide Fund for Nature (WWF) would like to thank the Western and Central Pacific Fisheries Commission for the opportunity to attend the 22nd Regular Session as an observer and to address the critically important role that it plays in the proper management of the Western and Central Pacific Ocean (WCPO) fisheries.

WWF calls on members of the WCPFC to address issues and recommendations raised at the SC21, NC21, TCC21, and WCPFC21.

Fisheries Observers

Since this issue is essential to monitoring and compliance, and there has been continued failure of the WCPFC to make significant progress, WWF has chosen to keep this issue at the forefront until progress is made. It is unquestionable that information collected as part of a successful observer program 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

[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.

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.

Level of Observer Coverage

Recent efforts by the Pacific Community to standardize observer coverage-data indicate that region-wide observer coverage is barely above 5%.[5] 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[6] or compliance objectives.[7]

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[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] Supra note 6 at 20-23, Tables 4, 5, and 6. (Sept. 4, 2024).

[6] *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.

[7] 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.

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."[8] 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.[9] 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.[10]

By continuing to fail to secure a scientifically or statistically valid level of observer coverage, the WCPFC fails to meet the charge of the WCPF Convention to generate and use

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[8] Gilman, Eric & Zimring, Mark. 2018. Meeting the objectives of fisheries observer programs through electronic monitoring. 10.13140/RG.2.2.28000.99846

[9] *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.

[10] 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.

the best available scientific information. Therefore, the WCPFC must take action to improve observer coverage across all vessels operating in the WCPFC Convention Area.

WWF recommends the WCPFC:

- **Establish a plan to increase observer coverage, by human observers or electronic monitoring, across all vessels operating in the WCPFC Convention Area on an annual basis to achieve 100% coverage by 2030.**

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 WCPFC22 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 WCPFC22 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.[11]

[11] *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.

Therefore, WWF encourages WCPFC22 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 HS with TRPs and HCR for bigeye (BET) and yellowfin (YFT);**
- **Hold multiple additional meetings by the 2026 annual meeting to ensure agreement on the HS for YFT and BET, and to sufficiently advance discussions among members;**
- **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.[12] 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:

- increase monitoring and improve the accuracy of monitoring by utilizing technologies such as EM
- prompt advance notification of all transshipments;
- timely delivery of all transshipment reports to the WCPFC; and
- strong sanctions for non-compliance.

Consistent with findings in WCPFC20-2023-18 that suggest high incidence of unreported transshipment, WWF recommends that transshipment requirements be buttressed by verification and validation of transshipment activities through redundant systems such as

[12] *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.

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 prioritized for transshipment 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 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 recommends the WCPFC:

- **Phase in100% observer (human or electronic) coverage on delivering and receiving vessels engaged in at-sea transshipment;**
- **The development and application of EM for transshipment monitoring; and**
- **Support or endorse the use of technology to verify and validate transshipment activity.**

Port State Measures

WCPFC must strengthen port state measures to align fully with the FAO Agreement on Port State Measures to combat IUU fishing activities. Revisions to this measure should include:

- Requiring advance notice of port entry
- Setting minimum levels of inspection
- Establishing clear criteria for denial of port entry or use

Managing the Use of Fish Aggregating Device (FADs)

The use of FADs in tropical tuna fisheries improves the economic performance of fishing operations and at the same time results in negative ecological impacts. Responsible FAD management is needed that mitigates these negative impacts. The WCPFC has taken important first steps by prohibiting the use of entangling materials in FADs and several initiatives to recover FADs have begun in the WCPO. Yet compared with other tuna RFMOs, WCPFC is falling behind in advancing more comprehensive FAD management reforms. Hence, WCPFC must adopt a more robust, science-based framework to ensure effective FAD management.

WWF recommends that WCPFC adopt the following measures:

- **Establish a measure require use of only 100 percent biodegradable FADs that is consistent with measures by other tuna Regional Fisheries Management Organizations (RFMOs)**
- **Create a FAD register**
- **Require near-real-time transmission of FAD position and acoustic biomass data (with a maximum time lag of 90 days) to improve scientific analysis**
- **Adopt a marking scheme for both FAD buoys and structures**
- **Setting rules for FAD ownership and buoy activation and deactivation**

Shark Conservation Measure

Despite the fact that many shark species are threatened with extinction, shark finning continues[13] in the WCPO by illegal practices and the need to tighten requirements to ensure shark finning does not occur remains. One of the most effective methods to prevent finning is to mandate that fish be retained on board with their fins naturally attached. The current regulation allows an exception for retention, where the fins and body are tied together.

To prevent abusing this exception and avoid creating a loophole for finning, monitoring should be strengthened when the exception is used.

WWF recommends the WCPFC:

- **Mandatory monitoring by observers or EMs when using the exception.**

Pacific Bluefin Tuna

The Pacific Bluefin Tuna (PBF) Working Group of the International Scientific Committee for Tuna and Tuna like Species in the North Pacific Ocean (ISC) completed a baseline assessment in 2024 (SAC-15 INF-N). The ISC determined that 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.

[13] *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.

With the recovery of PBF stocks, in 2024, the WCPFC and IATTC decided to increase the catch quota (large fish +50%, small fish +10%) to a level maintained at the increasing stock trend. In addition, due to the expansion of the distribution range of PBF in the southern hemisphere, a new quota has been set for New Zealand and Australia. However, there is a possibility that the expansion of PBF distribution will lead to new fishing opportunities for IUU fishing vessels, and it may lead to unexpected overfishing. WWF remains deeply concerned that overfishing will occur, exposing the stock to the risk of collapse again in the absence of robust management measures to address the impact of IUU fishery of PBF.

WWF recommends that the WCPFC:

- **Establishing Management Strategy Evaluation (MSE) with a precautionary Limit and Target Reference Point for PBF by 2025;**
- **Developing detailed measures and work plans for monitoring, control, and surveillance (MCS) of PBF. In particular, establish standardized reporting procedures for bycatch and discards, and strengthen reporting and monitoring of caging at farms;**
- **Developing Catch Documentation Scheme (CDS) by 2026 as a measure to improve data collection, control and traceability and reduce the risk of IUU fishing by strengthening monitoring of Pacific bluefin tuna; and**
- **Improving transparency in PBF fisheries by the phase-in of 100% observer (human or electronic) on all industrial vessels targeting or catching this stock. Both IATTC and WCPFC have adopted minimum standards for EM, that offer a good alternative to human observers increase.**

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