



Global Fishing Watch Position Statement: 22nd Regular Session of the Technical and Compliance Committee

Global Fishing Watch (GFW) thanks the Western and Central Pacific Fisheries Commission (WCPFC) for the opportunity to participate in the 22nd Regular Session of the Technical and Compliance Committee (TCC22) as an observer. We are grateful to the Chair, Members and Secretariat for their work preparing for this meeting and the Government of the Federated States of Micronesia for hosting.

This paper reflects on Automatic Identification System (AIS) data already being used in WCPFC's technical and compliance work, as well as additional opportunities to strengthen Monitoring, Control and Surveillance (MCS) with AIS in WCPFC. It highlights: (1) AIS as a publicly-accessible and complementary backup to Vessel Monitoring System (VMS); (2) AIS as a tool to support impracticability determinations under CMM 2009-06 on transshipment; and (3) further applications already supporting WCPFC fisheries.

1. AIS as a resilient backup to VMS

The Commission's VMS framework under [CMM 2014-02](#) remains the primary positional reporting system for the Convention Area. The WCPFC, alongside the Pacific Islands Forum Fisheries Agency (FFA), has a commendable and robust VMS framework that provides secure positional reporting. However, VMS units can be subject to delayed transmission or low frequency polling rates – gaps that can be difficult for the Secretariat or flag CCMs to independently verify in real time. A valuable complement to VMS, especially in the context of operational activity, patrol support and intelligence gathering in the MCS context, is AIS. While AIS can be subject to tampering and can carry its own challenges like satellite signal congestion, it still offers an additional, independent source of information that can be used alongside VMS:

- **Independent and publicly-accessible coverage:** AIS is transmitted independently of a vessel's VMS unit, giving the Secretariat and Members a second source of positional data during VMS reporting gaps under CMM 2014-02, including during outages or reporting gaps.
- **Distinguishing failure from non-compliance:** Cross-referencing AIS against VMS records can help determine whether a reporting gap reflects a genuine technical failure or a deliberate attempt to obscure vessel activity.
- **Precedent within the FFA:** The FFA also already requires AIS for vessels to be included in “Good Standing” on the FFA Vessel Registry – adding a strong foundation for WCPFC to leverage AIS (1).

2. AIS to support impracticability determinations under CMM 2009-06

[CMM 2009-06](#) prohibits high seas transshipment by longline and other non-purse seine vessels except where a CCM has determined, per the interim guidelines in paragraph 37, that it is “impracticable” for certain vessels to operate without transshipping at sea. In practice, these determinations have largely relied on general assertions of economic hardship rather than vessel-specific evidence. AIS data can help close this evidentiary gap by providing:

- **Objective movement data and comparative benchmarking:** Building on TCC20 findings, AIS-derived transit patterns, time at sea, and distances between fishing grounds and port could be further examined to provide additional insight into “impracticability” (2). Vessels claiming impracticability could be benchmarked against comparable vessels of the same gear type and flag that transship in port, offering a more objective basis albeit with data limitations, or looking at where longline vessels would need to operate to transship in port to be profitable. Global Fishing Watch would be pleased to help Members, the FFA or the Secretariat in conducting this analysis using our data and tools.



- **Insights into fishing patterns during transshipment:** The study submitted to TCC20 by the Marshall Islands Marine Resources Authority and Starboard Maritime Intelligence found that eight carrier vessels accounted for over 73% of all high-seas transshipments recorded in the Convention Area, and that several of these carriers ceased AIS transmission for up to approximately 900 nautical miles while transiting to and from port (2). The study also proposed a distance-ratio method comparing a vessel's AIS-derived travel distance to the transshipment site against its distance to the nearest suitable port. These findings illustrate both the practical value of AIS-derived tracking for compliance assessment and the importance of addressing transmission gaps to fully inform impracticability claims.

3. Further applications supporting WCPFC's compliance framework

Beyond VMS resilience and transshipment, AIS data supports several subjects relevant to TCC's mandate:

- **Port State Measures interoperability:** As the Commission works to align [CMM 2017-02](#) with the FAO Port State Measures Agreement, AIS-derived transit data could help verify advance notice of port entry and cross-check vessel movements against declared arrivals, supporting the ongoing CMM review.
- **Forced labor monitoring:** AIS-derived vessel behavior – such as unusually long time at sea – is increasingly used to help identify indicators of forced labor risk in fishing fleets, an application with growing relevance to WCPFC's own crew labour standards under [CMM 2024-04](#) (3).
- **High Seas Boarding and Inspection:** As noted in [WCPFC-TCC22-2026-RP04](#), AIS also offers a supportive tool in HSBI operations in the WCPFC context, such as the [recent Operation Island Chief](#). For example, AIS-derived tracks can help boarding parties verify a target vessel's recent position and movements ahead of an inspection, and can corroborate or contextualise activity observed on board – supporting more efficient targeting and cross-checking as the HSBI voluntary regional guides are progressively rolled out.

4. Conclusion and recommendations

In balance, AIS offers a strong complementary tool to VMS with diverse applications across the WCPFC MCS framework. Taken together, Global Fishing Watch recommends that TCC22 consider:

- **The use of AIS-derived vessel movement data to inform review of impracticability under paragraphs 34 and 37 of CMM 2009-06, and report back on findings to TCC23.**
- **The benefits and challenges of incorporating AIS into the vessel monitoring framework under CMM 2014-02 given its widespread applications in the Convention Area.**

Furthermore, Global Fishing Watch notes its willingness to meet with WCPFC Members to share information about Global Fishing Watch's Map, Vessel Viewer tool and publicly available datasets. We are also available to explore whether we can help address any analysis needs of WCPFC stakeholders.

References

1. Pacific Islands Forum Fisheries Agency. (2025, July 1). *FFA online vessel register 2025 – Vessel registration guidelines*. <https://vessel-register.ffa.int>
2. Lehmann, M.K., Blaha, F., Cagua, F., Bigler, B. (2024). A framework to evaluate the economic hardship implications of high-seas transshipment activities in the Western Central Pacific Ocean. Marshall Islands Marine Resources Authority and Starboard Maritime Intelligence. WCPFC-TCC20-2024-DP07.
3. Welch, H., Clavelle, T., White, T. D., Cimino, M. A., Van Osdel, J., Hochberg, T., Kroodsma, D., & Hazen, E. L. (2022). Hot spots of unseen fishing vessels. *Science Advances*, 8(44), Article eabq2109. <https://doi.org/10.1126/sciadv.abq2109>