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**Benchmarking Tuna RFMO at-sea transshipment measures against the 2022 FAO Voluntary
Guidelines: A Comprehensive Analysis**

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BENCHMARKING TUNA RFMO AT-SEA TRANSSHIPMENT MEASURES AGAINST THE 2022 FAO VOLUNTARY GUIDELINES: A Comprehensive Analysis



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Abstract

This analysis benchmarks transshipment measures in the five tuna RFMOs against the 2022 FAO *Voluntary Guidelines for Transshipment*. Results show no RFMO currently fully implements these guidelines. ICCAT and CCSBT demonstrate the strongest levels of implementation. IATTC, IOTC and WCPFC show solid implementation in some areas, and each have varying degrees of improvement needs. Overall, for all tuna RFMOs, gaps exist in implementing the guidelines in the areas of risk-based approaches, documentation and reporting, and verification and monitoring. To support continuous improvement and to assist RFMOs in their efforts towards full implementation of the FAO Guidelines, this analysis informed the development of implementation checklists for all tuna RFMOs (Annex 1), and the identification of those data fields that would bring existing RFMO transshipment declarations more in alignment with the FAO Guidelines (Annex 2).

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Executive Summary

Every Regional Fisheries Management Organization (RFMO) in the world permits at-sea transshipment under separate regulatory frameworks. Well-regulated at-sea transshipment

operations can provide efficient support to fishing vessels. However, when poorly regulated, at-transshipment can undermine effective conservation and management, create opportunities for illegal, unreported and unregulated (IUU) fishing activities, and hide other maritime crimes such as smuggling and forced labor.¹

ISSF has consistently advocated for robust at-transshipment controls as part of a broader system of effective monitoring, control and surveillance (MCS), including robust port State controls aligned with the FAO Port State Measures Agreement.

Each of the five tuna RFMOs have regulated at-sea transshipment to some extent for a decade or more. The 2022 *FAO Voluntary Guidelines for Transshipment* (or “FAO Guidelines”)

provide the first global framework specifically addressing transshipment² practices in oceanic fisheries. These Guidelines establish standards against which RFMOs can measure their approaches and identify areas for improvement.³

This analysis benchmarks the at-sea transshipment measures of five tuna RFMOs against the FAO Guidelines. Implementation varies substantially both in breadth and in architectural completeness.

Key Findings:

- 1 No tuna RFMO yet fully meets the 2022 FAO Voluntary Guidelines.**
- 2 ICCAT and CCSBT have the most robust implementation.**
- 3 All tuna RFMOs analyzed have not implemented risk-based approaches or authorization criteria, and most can improve in inter-RFMO data sharing and systematic follow-up.**

¹ EJF (2023) *THE WEAKEST LINK: How at-sea trans-shipment fuels illegal fishing and human rights abuses in global fisheries*; ILO (2024) *Forced labour in commercial fishing*; ILO (2013), *Caught at Sea: Forced Labour and Trafficking in Fisheries*; ILO (2016) *Fishers First: Good Practices to End Labour Exploitation at Sea*.

² The FAO Guidelines address the regulation, monitoring and control of transshipment of fish, which have not been previously landed, whether processed or not. The benchmarking analysis in this Report focuses on tuna RFMO measures that regulate at-sea transshipment activities.

³ While RFMOs are the focus of this report, ISSF recognizes that flag States are ultimately responsible for the conduct of their vessels, and it is at the flag State level that the most monitoring can be achieved (i.e., through national MCS systems). However, RFMOs play a crucial role in supporting the effective regulation of transshipment, including by requiring flag States to undertake certain actions – such as risk assessments – in a standardized and effective way.

Analysis across four provision categories — authorization frameworks, verification and risk management, monitoring systems, and data sharing — reveals that no RFMO achieves full implementation, with all organizations demonstrating the need to improve in verification and risk management procedures.

The analysis also identifies areas that all RFMOs need to address in order to more fully implement the FAO Guidelines. For example, no RFMO uses systematic risk-based authorization approaches, which would strengthen regulation of at-sea transshipment given the transnational nature of vessels engaged in such transshipment, and very few RFMOs implement formal data sharing mechanisms.

The improvements identified in this analysis, among others, to strengthen risk-based mechanisms and authorization requirements, collect and disseminate data, enhance monitoring and verification tools and follow-up processes, establish formal data-sharing and coordination between RFMO regarding at-sea transshipment would reduce the likelihood of IUU fishing activities and of products of such activities flowing into global markets. The FAO Guidelines provide the roadmap for reform to ensure global at-transshipment operations are governed effectively.

To support continuous improvement and moving towards full implementation of the FAO Guidelines, this analysis informed the development of implementation checklists identifying the actions required of all RFMOs, alongside targeted measures specific to individual RFMOs (Annex 1), as well identified those data fields that would bring existing RFMO transshipment declarations more in alignment with the FAO Guidelines (Annex 2). These tools identify RFMO strengths while also providing concrete suggestions to address identified implementation gaps.

Research Questions

When poorly regulated, at-sea transshipment can increase the likelihood of IUU fishing activities, including misreporting of catches and overfishing, which undermine effective fisheries management.

The FAO Guidelines established the first comprehensive global framework for transshipment governance. However, no systematic evaluation exists of how existing tuna RFMO measures for at-sea transshipment align with these standards. This analysis fills that gap, benchmarking all five tuna RFMOs against 59 specific Guidelines provisions to identify areas that would benefit from reform.

To identify priority reforms, this analysis examines:

- 1. How do the at-sea transshipment measures adopted by the five tuna RFMOs (WCPFC, IATTC, ICCAT, IOTC, and CCSBT) align with the FAO Guidelines?**
- 2. What specific actions should each RFMO take to fully implement the FAO Guidelines?**
- 3. Are there gaps that require coordinated action across all RFMOs?**

Introduction

At-sea transshipment can be one of the most vulnerable control points in the global tuna supply chain. Weak, or ineffective, oversight undermines conservation and management efforts, enables IUU fishing activities, and compromises the sustainability goals that drive the international management system. When at-sea transshipment operations lack adequate regulatory frameworks, they create gaps that threaten both fisheries management and supply chain integrity across the world's oceans.

Transshipment refers to the direct transfer of fish from one vessel to another at sea or in port, without the fish being recorded as landed. While transshipment can provide legitimate operational efficiencies, it also creates significant risks for fisheries management and conservation when regulatory frameworks prove inadequate.

The practice occurs in two primary forms: at-sea transshipment, where transfers happen on the high seas or within exclusive economic zones while vessels come alongside, and in-port transshipment, where transfers occur within a port area under varying degrees of oversight. The focus in this report is the regulation of at-sea transshipment by RFMOs.⁴ At-sea transshipment presents particular challenges for monitoring, control, and surveillance (MCS) systems due to the remote locations where it takes place and limited oversight opportunities.

Transshipment operations involve multiple vessel types and stakeholders. Donor vessels (usually longline fishing vessels) transfer catch to receiving vessels (usually specialized carrier or transport vessels, or other fishing vessels), often along with supplies and crew (known as “transfers”). These complex operations can obscure the true origin of fish, complicate catch verification, and create opportunities for illegal, unreported, and unregulated (IUU) fishing activities to enter legitimate supply chains.

Transshipment operations are inherently global and transnational in scope. Major transshipment companies operate fleets that traverse multiple ocean basins and jurisdictions, with individual vessels routinely moving between the regulatory areas of different RFMOs. This global reach means that a single carrier vessel might operate under five different RFMO transshipment measures within a single fishing season. This transnational reality means that regulatory gaps or weaknesses in any single RFMO's measures can undermine the entire global system. Vessels and operators can exploit jurisdictional boundaries, moving operations to areas with weaker oversight or taking advantage of inconsistent requirements across organizations.

⁴ Tuna RFMO transshipment measures (WCPFC CMM 2009-06, IOTC Resolution 24/05 and IATTC Resolution C-22-03, and ICCAT Recommendation 21-15) generally do not regulate transshipment in port. WCPFC and IATTC explicitly state that transshipments occurring within EEZs or in port are managed in accordance with national laws, effectively excluding these operations from RFMO oversight. IOTC and ICCAT do not expressly provide for regulation of in-port transshipment. The measures are structured around at-sea transshipment controls — covering authorization requirements, observer coverage, reporting obligations, and monitoring — while port-based operations remain under coastal State jurisdiction. CCSBT is the exception to this given its transshipment regulation is explicitly linked to the integrity of its Catch Documentation Scheme where ports are a critical control point where verification occurs.

The FAO *Voluntary Guidelines on Transshipment*

In 2022, the Food and Agriculture Organization of the United Nations (FAO) adopted the *Voluntary Guidelines for Transshipment*. This was the first global framework specifically addressing transshipment practices in oceanic fisheries. These guidelines establish comprehensive standards for transshipment governance.

The FAO Guidelines are structured around several key principles:

Comprehensive Coverage: The FAO Guidelines address all aspects of transshipment operations, from vessel authorization and advance notification requirements to post-event reporting and verification procedures. They apply to all transshipment activities regardless of location, vessel type, or species involved.

Risk-Based Approach: Central to the FAO Guidelines is the concept that transshipment measures should be "prioritized and proportional with identified risks" and undertaken on "timescales that support effective MCS." This recognizes that different transshipment scenarios present varying levels of risk to conservation and management objectives.

Technology Integration: The FAO Guidelines emphasize the use of modern monitoring technologies, including vessel monitoring systems (VMS) and electronic reporting systems to enhance oversight capabilities.

Coordination: The framework recognizes the need for coordination among flag states, coastal states, port states, and RFMOs to ensure effective transshipment governance across jurisdictions.

Transparency and Accountability: The FAO Guidelines call for transparent authorization processes, public vessel registries, and robust compliance and enforcement mechanisms.

While voluntary in nature, the FAO Guidelines carry significant weight as representing international consensus on modern, effective transshipment practices. They provide a benchmark against which existing measures can be evaluated and improved, offering a pathway toward more effective global transshipment governance.

Methodology: Benchmarking RFMO Measures

To assess how tuna RFMO at-sea transshipment measures align with the FAO Guidelines, a systematic analysis of five tuna RFMOs was conducted: the Western and Central Pacific Fisheries Commission (WCPFC), the Inter-American Tropical Tuna Commission (IATTC), the International Commission for the Conservation of Atlantic Tunas (ICCAT), the Indian Ocean Tuna Commission (IOTC), and the Commission for the Conservation of Southern Bluefin Tuna (CCSBT).

The analysis evaluated each RFMO's current transshipment measures against the FAO Guidelines. Implementation complexity and operational impact vary — some provisions establish foundational architecture essential for any functional framework, while others enhance transparency or optimize existing systems. In this respect, assessing implementation is more nuanced than a simple raw count, which is a subtlety this report seeks to reflect.

Overall, this assessment aims to support RFMOs and members States in improving the monitoring and regulation of at-sea transshipment by providing a clear picture of where each assessed RFMO stands relative to the FAO Guidelines, and by identifying priority reforms for each.

The FAO provisions assessed fall into four categories with differing implications for regulatory effectiveness:

Authorization frameworks (provisions 11-23): These provisions establish who can engage in transshipment and under what conditions, creating the architectural foundation for control. Without robust authorization frameworks, monitoring and verification systems cannot function effectively.

Verification and risk management (provisions 24-43): These provisions enable proactive oversight through pre-event notifications, authorization verification, cross-referencing procedures, and observer data utilization. This category distinguishes between frameworks that merely document transshipment retroactively versus those that actively manage risk.

Monitoring systems (provisions 44-52): These provisions establish technical requirements for VMS, observer programs, and independent verification. Effective monitoring creates the information foundation for compliance enforcement.

Data sharing and transparency (provisions 53-56, 59): These provisions enhance accountability through information exchange between RFMOs and public disclosure of authorized vessels and transshipment activities.

Performance across these categories varies. RFMOs generally demonstrate stronger implementation of authorization frameworks (60-70% of provisions) and monitoring systems (45-65%), while verification and risk management represents the weakest category across all organizations (20-45%), with universal gaps in pre-event notification and pre-authorization verification procedures. This analysis assesses each RFMO's implementation across these categories to identify both quantitative implementation levels and qualitative architectural completeness.

While most criteria have clear implementation requirements, some provisions call for actions to be undertaken on timescales that "*support effective MCS*" without prescribing specific time periods. In these cases, this analysis applied time periods that align with ISSF's best practice recommendations and assessed implementation on that basis (for example, advance notification periods).

VMS transmission is the exception to this. The FAO Guidelines specifically call for VMS data to be reported to competent authorities "in near real time" and "on a time scale that supports effective MCS." However, the FAO Guidelines do not define these terms, leaving RFMOs and flag States to interpret what constitutes acceptable reporting frequencies and transmission latency. There is no other international or authoritative standard on what constitutes "in real time" to use as a reference point, so it was necessary to consider a suitable proxy.

In this case, without a defined standard in the fisheries context, this analysis looks to the maritime safety context for technical guidance. The International Maritime Organization's Automatic Identification System (AIS) standard requires continuous transmission with intervals appropriate for vessel positioning.

Standard VMS reporting intervals — the automated schedule at which ALCs transmit position reports to FMCs — typically range from one to several hours. For this analysis, "near real time" refers to transmission latency: the time between position capture by the ALC and receipt by the monitoring authority. The report considers that effective compliance monitoring requires transmission latency measured in minutes rather than hours.⁵

The authors acknowledge that each RFMO operates in different risk environments and that measures that "*support effective MCS*" may differ between RFMOs in practice. The report does not assess the practicality of addressing these gaps, nor was it in scope to consider other tools that may provide equal or better management for the risk the FAO Guidelines sought to address.

⁵ **Polling** — a manual intervention where FMC operators send a command requiring an ALC to transmit immediately — addresses different monitoring needs than standard reporting intervals and isn't considered in this benchmarking analysis.

RFMO Assessments

This analysis assesses tuna RFMOs in terms of both the quantitative implementation of the FAO Guidelines provisions and qualitative architectural completeness. It should be noted that not all of the FAO Guidelines' provisions carry equal weight — for example, foundational authorization controls and verification procedures create regulatory capacity that transparency measures alone cannot provide.

Summary

- ICCAT - Most comprehensive framework across all dimensions with some opportunities for enhancement
- CCSBT - Highest rate of implementation of FAO Guidelines provisions, particularly strong in verification procedures; with some opportunities for enhancement
- IATTC – Solid established frameworks with some opportunities for enhancement
- IOTC - Established frameworks requiring some strengthened implementation, particularly in verification and data sharing
- WCPFC - Established frameworks requiring strengthened implementation, particularly in authorization and verification procedures

This assessment recognizes that raw provision counts can obscure important differences in regulatory architecture. For example, WCPFC demonstrates strong implementation of data sharing and transparency provisions (approximately 75% of this category) and yet would benefit from enhanced authorization and verification procedures to complement its existing robust transparency mechanisms. Conversely, ICCAT's assessment as having the “most comprehensive framework” reflects not only its implementation rates, but also the breadth of regulatory coverage, balanced performance across categories, and demonstrated institutional capacity for ongoing reform through regular measure reviews.

This approach ensures that assessments reflect both the quantitative breadth of implementation and the qualitative importance of different provision categories for effective transshipment governance.

ICCAT

Current Transshipment Framework: ICCAT has the most comprehensive transshipment framework among tuna RFMOs. The current framework, primarily captured in Recommendation 24-15 can serve as a model for other RFMOs.

Recent Organizational Work: ICCAT has consistently modernized its transshipment measures through regular reviews and reforms. Major reforms in 2021 introduced enhanced observer requirements, strengthened documentation and reporting requirements, and updated port inspection and monitoring provisions. From January 1, 2022, vessels without IMO numbers were prohibited from engaging in transshipment activities and excluded from ICCAT's Record of Authorized Carrier Vessels. The 2024 amendments further restricted non-Contracting Party carrier vessels, with new vessels prohibited from November 18, 2024, unless replacing existing vessels of the same flag. A further review is scheduled for no later than 2027.

Assessment Against FAO Guidelines: ICCAT demonstrates strong performance across all provision categories. The organization implements authorization frameworks effectively (approximately 75% of provisions), including prohibition on dual-role vessels, mandatory IMO numbers for eligible vessels, and comprehensive carrier vessel controls strengthened through 2024 amendments limiting new non-contracting party carriers.

ICCAT's monitoring system implementation is strong (approximately 65% of provisions), featuring 100% observer coverage requirements on carrier vessels and comprehensive VMS requirements. The organization demonstrates moderate data sharing and transparency (approximately 50%), with established procedures for sharing transshipment data. Opportunities remain for enhanced inter-RFMO coordination. ICCAT's implementation of verification and risk management provisions could be improved with enhancement to its pre-event notification and cross-referencing procedures.

ICCAT can improve in several areas to more fully meet the FAO Guidelines:

Authorization and Notification

- Adopt specific guidelines and criteria for flag State authorization of transshipments. While flag States must be satisfied that they can monitor vessel compliance, the Recommendation provides no guidance on how to make this assessment.
- Lengthen the timeframe for pre-event notifications (24 hours prior is currently required) to support effective MCS.

Documentation and Data Sharing

- Amend the transshipment declaration to add data fields recommended in FAO Guidelines Annex I, including quantities of fish on board before transshipment and complete vessel contact details.
- Develop procedures for collecting and cross-referencing landing data against transshipment records.

- Publicize transshipment information on all transshipment events, including species, locations and product form.
- Require disclosure of the circumstances giving rise to transshipments undertaken in force majeure situations.
- Require vessels to retain transshipment records on board.

Verification and Follow-up Procedures

- Establish specific procedures to follow-up on identified infractions and flag State enforcement action through the ICCAT annual compliance reviews.
- Develop procedures so that vessels with serious infractions are automatically included in the draft IUU vessel list.

CCSBT

Current Transshipment Framework: CCSBT maintains a comprehensive transshipment framework anchored by its Catch Documentation Scheme, which tracks southern bluefin tuna (SBT) from harvest through transshipment to final product destination. All whole SBT are required to be tagged and the Catch Monitoring Form records harvest and transshipment information for all SBT — both wild-caught and farmed — creating robust traceability. Combined with 100% observer coverage on carrier vessels through the Regional Observer Program, this architecture provides strong monitoring capacity. While CCSBT has its own independent requirements, it also has MOUs in place with IOTC, WCPFC and ICCAT to cross endorse observers, share data and information, and to ensure that reporting requirements are not unnecessarily duplicated. CCSBT's framework includes a provision prohibiting authorization of carrier vessels not authorized by other RFMOs where they operate. This creates an automatic strengthening mechanism — when any other tuna RFMO implements carrier vessel authorization improvements, those improvements flow through to CCSBT operations. The organization actively monitors changes in other RFMOs' measures, responding to developments in IOTC and ICCAT while independently examining opportunities to strengthen its own transshipment regulation.

Recent Organizational Work: Members conducted a regular review of the transshipment measure in 2025, examining supply declarations and considering updates adopted by IOTC and ICCAT. The review assessed whether supply declarations would add value, but insufficient information exists to determine their utility. IOTC is not yet sharing supply declaration data from its trial, however Indonesia's pilot program already provides supply declaration information to CCSBT. This will be part of the next scheduled review in 2028. Members approved a 12-month extension to Indonesia's at-sea transshipment trial using national observers through October 31, 2026. This extension is conditional — Indonesia must provide a detailed implementation plan with timeline by December 31, 2025, addressing recommendations from the 2025 Quality Assurance Review.

Performance Against FAO Guidelines: CCSBT achieves the highest raw implementation rate among tuna RFMOs of the FAO Guidelines provisions, with the Catch Documentation Scheme creating capabilities across multiple provision categories. The organization implements strong authorization frameworks (implementing approximately 70% of the FAO provisions), with

comprehensive controls over carrier vessel authorization and full prohibition on non-contracting party carriers.

CCSBT also has solid implementation in the areas of verification and risk management (implementing approximately 45% of provisions). The CDS architecture enables systematic cross-referencing procedures and data collection mechanisms, creating proactive verification capacity rather than retrospective documentation. Monitoring system implementation is also strong (approximately 65%), with 100% independent observer coverage on carrier vessels through the Regional Observer Program and comprehensive electronic reporting requirements.

Data sharing and transparency implementation is also strong (it has in place approximately 60% of the FAO provisions), with formal MOUs with IOTC and ICCAT for information exchange and established procedures for sharing transshipment data. The organization's provision prohibiting authorization of carrier vessels not authorized by other RFMOs where they operate creates an automatic strengthening mechanism — improvements in other RFMOs flow through to CCSBT operations. Gaps do remain in pre-authorization verification procedures, and the pilot program is an implementation concern.

CCSBT can improve in several areas to more fully meet the FAO Guidelines:

Authorization and Notification

- Adopt specific guidelines and criteria for flag State authorization of transshipments that complement the Compliance Policy Guidelines.
- Include on the public authorized fishing vessel list whether or not a vessel is authorized to transship at sea.
- Lengthen the timeframe for pre-event notifications (24 hours prior is currently required) to support effective MCS.

Documentation and Data Sharing

- Amend the transshipment declaration to add recommended data fields from the FAO Guidelines Annex I, such as quantities of fish on board before and after transshipment and vessel owner and company information.
- Expand formal procedures for sharing transshipment data between additional RFMOs to enhance public disclosure of transshipment information.
- Publish transshipment information on all transshipment events – including location, product form and landings.

Verification and Follow-up Procedures

- Establish specific procedures to follow-up on identified infractions and flag State enforcement action through the CCSBT annual compliance reviews.

- Establish a requirement that flag States must confirm donated fish was taken in accordance with applicable rules when requested.
- Require vessels to retain transshipment records on board.

Pilot Program

- Ensure that the areas where implementation of the trial programme was not meeting the requirements of the Resolution, as identified 2025 Quality Assurance Review, are rectified.

IATTC

Current Transshipment Framework: Within IATTC, transshipment at sea is prohibited except in the framework of “the program to monitor transshipment at sea” established under Resolution C-22-03. Only Large-Scale Tuna Longline Vessels (LSTLFVs) as defined by the Resolution and carrier vessels specifically authorized by their respective flag CPCs to receive tuna from the former and listed on the IATTC Record of Carrier Vessels may participate in the program. Transshipments are observed through the Regional Observer Program established by the resolution. To date that program has been administered by MRAG, an independent entity, and is funded by the participating LSTLFVs flag States. The framework establishes basic authorization and monitoring requirements. The current framework expressly notes the need for “better transshipment information-sharing protocols between IATTC and WCPFC” (given the existence of an overlap area between the two commissions).

Recent Organizational Work: The 2022 updates modernized several aspects of IATTC's transshipment measures, including requirements for all transshipment declarations to be sent to relevant authorities, specification of catch location and date in notifications, implementation of publicly available authorized vessel lists, mandatory shark species reporting, and inclusion of IMO numbers for all for all LSTLFVs (if eligible). These reforms aligned the measure more closely with international best practices and demonstrate IATTC's commitment to continuous improvement.

Performance Against FAO Guidelines: IATTC demonstrates solid implementation across FAO provision categories. The organization has strong implementation of many of the FAO Guidelines' authorization framework provisions (approximately 65% of provisions), with vessel authorization requirements, electronic reporting, and IMO number requirements for LSTFLVs, if eligible. The requirements stipulated in Resolution C-22-03 to receive an authorization make it clear that LSTFLVs can only transship at sea to an authorized carrier and cannot be themselves receivers. In very few instances of emergency and force majeure, transshipment between LSTFLVs has been requested to the Commission, which authorized it.

IATTC implementation of verification and risk management (approximately 35% of provisions), shows strength in post-event procedures — particularly in examining observer reports and triggering follow-up actions — while having room to improve in establishing in pre-event notification and authorization verification. The IATTC Statistical Document Program also provides a verification point for transshipments as transshipments reporting must be consistent with the statistical documents provided for the catch.

IATTC has solid implementation of monitoring systems (approximately 55%), with 100% observer coverage on carrier vessels through the Regional Observer Program, though VMS reporting intervals and limited longline observer coverage create oversight gaps. In particular, the infrequent VMS polling rate is rooted in Resolution C-14-02, which applies only to vessels $\geq 24\text{m}$. This is effectively isolated to the longline sector, since purse-seine monitoring has been strengthened through other measures (e.g., C-24-01).

Classification of longline vessels under the IATTC regime is not internally coherent across management, compliance, and monitoring measures. VMS obligations under Resolution C-14-02 apply only to vessels $\geq 24\text{ m}$, whereas other IATTC provisions refer to longliners without defining size, or use capacity- or gear-based definitions. This produces a fragmented regulatory landscape in which a significant portion of the longline fleet — particularly those under 24m or operating in coastal waters — falls outside the VMS system and other monitoring requirements.⁶

Data sharing and transparency is identified as the category where IATTC could improve the most. IATTC currently has limited formal procedures for sharing transshipment data between RFMOs and there are opportunities to enhance public disclosure of transshipment information.

IATTC can improve in several areas to more fully meet the FAO Guidelines:

Authorization and Notification

- Adopt specific guidelines and criteria for flag State authorization of transshipments.
- Lengthen the timeframe for pre-event notifications (24 hours prior is currently required) to support effective MCS, and ensure both vessels notify data, time and location.

Documentation and Data Sharing

- Expand and establish formal procedures for sharing transshipment data between RFMOs to enhance public disclosure of transshipment information.

Verification and Follow-up Procedures

- Adopt requirements to suspend transshipments during ALC system failures.
- Amend C-14-02 to apply VMS requirements to all longline vessels engaged in at-sea transshipment.
- Require disclosure of the circumstances giving rise to transshipments undertaken in force majeure situations.

⁶ See SAC – 16-09 for further explanation of this issue.

IOTC

Current Transshipment Framework: IOTC operates under Resolution 25/05. The framework provides carrier vessel regulation and, like IATTC and ICCAT, uses an independent Regional Observer Programme for transshipment monitoring. However, the measures sit within a substantially weaker MCS framework.

Recent Organizational Work: IOTC updated its transshipment measures in 2025. The revised measure includes a provision that there will be no additional or new authorizations to carry out transshipment for carrier vessels not flagged to Contracting Parties or Cooperating Non-Contracting Parties of the IOTC that were not already listed on the IOTC Record of Authorised Vessels on 1 April 2025. IOTC also continues to permit one CPC to operate under an exception within the Resolution under a pilot program that was reviewed in 2025.⁷ The IOTC adopted some other modifications to its transshipment measure but did not address the deficiencies outlined in the review.⁸

Performance Against FAO Guidelines: IOTC demonstrates variable implementation across provision categories, with notable strengths in certain areas alongside opportunities for substantial improvement in other areas. The organization has strong implementation of authorization frameworks (approximately 60% of the FAO provisions), establishing vessel authorization requirements and maintaining authorized vessel lists.

Implementation of verification and risk management elements represents the areas IOTC can most improve upon (approximately 20% of provisions). While IOTC has established the Regional Observer Programme providing 100% carrier vessel coverage — a strength — the organization has not yet developed systematic procedures for cross-referencing transshipment data, pre-event verification processes, or comprehensive utilization of observer data for compliance purposes. This limits capacity for proactive risk management.

IOTC has solid monitoring implementation (approximately 55% of FAO provisions), which is anchored by the Regional Observer Programme's comprehensive carrier vessel coverage.

⁷ The program was independently evaluated in early 2025, with the assessment identifying significant gaps: only 26% of requirements were fully implemented, observer training and certification validity issues affected 50-65% of personnel, reporting deadlines were routinely missed by months, and fundamental weaknesses in compliance monitoring were documented. See 'Independent Review of Indonesia's Pilot Project for Monitoring At Sea Transshipments' March 2025 https://iotc.org/sites/default/files/documents/2025/04/Corrigendum_-_FINAL_REPORT_-_Independent_assessment_of_Indonesia_transshipment_pilot_project.pdf

⁸ IOTC expanded Indonesia's pilot program from 17 to 20 wooden carrier vessels and formalized oversight mechanisms in new paragraph 29 and Annex VI. Key changes include: (1) mandatory ROP consortium training of Indonesian trainers in 2026 to ensure national observers meet IOTC standards; (2) requirement that national observer reports be submitted to the ROP consortium for evaluation against IOTC standards, with findings reported annually to the Compliance Committee; (3) establishment of a 2026 Compliance Committee review to evaluate implementation and recommend corrective actions; (4) a 2027 effectiveness review to assess national observer compliance with tasks and reporting obligations; and (5) a 2027 Commission decision point on whether to continue the program. The amendments did not address the deficiencies relating to invalid or expired observer training certificates, invalid or expired medical certificates, lateness of observer reports (averaging 72 days), issues with observer compliance monitoring rules and weaknesses in completing fundamental reporting obligations.

Opportunities exist, however, to strengthen observer reporting requirements and enhance the use of VMS.

Data sharing and transparency implementation remains limited (approximately 25% implementation of FAO provisions). The organization would benefit from developing formal procedures for sharing transshipment data with other RFMOs beyond CCSBT and enhancing public disclosure of transshipment information and vessel authorization details.

IOTC can improve in several areas to more fully meet the FAO Guidelines:

Authorization and Notification

- Lengthen the timeframe for pre-event notifications (24 hours prior is currently required) to support effective MCS and report the quantities of fish on board prior to the transshipment event as well as the amount to be transhipped.

Documentation and Data Sharing

- Amend the transshipment declaration to add recommended data fields from the FAO Guidelines, Annex I such as vessel contact information (name, nationality and contact information for the master), transshipment location (lat/long) and quantities onboard prior to transshipment by area, species, product form and estimated quantity.
- Establish formal procedures for sharing transshipment data between other RFMOs to enhance public disclosure of transshipment information.
- Publish transshipment information on all transshipment events – including locations, product form and landings.

Verification and Follow-up Procedures

- Develop procedures so that vessels with serious infractions are automatically included in the draft IUU vessel list.
- Strengthen procedures for cross-referencing transshipment data, pre-event verification processes, and observer data.
- Require vessels to retain transshipment records on board.

Non-Contracting Parties

- Encourage those Non-Contracting Parties that flag carrier vessels that operate in the IOTC Area of Competence, and which are allowed to continue to do so under Res. 25/05, to become IOTC Contracting Parties or Cooperating Non-Parties.

Pilot Program

- Establish measures to address identified weakness in the pilot program.

WCPFC

Current Transshipment Framework: WCPFC operates under CMM 2009-06.

Recent Organizational Work: WCPFC established an Inter-sessional Working Group on Transshipment in 2019 to review CMM 2009-06, which concluded its work in 2024. The working group developed minimum data fields for observer transshipment monitoring, which were adopted. The working group proposed several technical amendments to the measure. None of these were adopted and the Working Group was discontinued. WCPFC Secretariat access to transshipment observer reports is a recent development - from mid-2023 onwards, following reforms adopted at WCPFC19 in December 2022.

Performance Against FAO Guidelines: Overall, WCPFC has a moderate implementation of the FAO Guidelines in certain categories; however, critical gaps undermine its effectiveness at managing at-sea transshipment.

Data sharing and transparency represents WCPFC's strongest category (WCPFC implements approximately 75% of the FAO provisions), with established procedures for accessing non-public domain data for MCS purposes (including in relation to coordination of data sharing with IATTC and CCSBT), publicization of transshipment information and public vessel lists.

There is solid authorization framework implementation (approximately 60% of provisions) with established basic vessel authorization requirements and electronic reporting. The measure also lacks any provisions for regulating non-catch transfers of fuel or supplies during transshipment operations.

Monitoring implementation is moderate (WCPFC implements approximately 45% of these provisions). CMM 2009-06 mandates 100% observer coverage on one vessel during at-sea transshipment. For high seas transshipments, the observer is required to be on the receiving vessel but there are other cases covered by the measure that allow the observer to be on either the receiving or offloading vessel. Further, the WCPFC is the only tuna RFMO that has not implemented an independent Regional Observer Program for transshipment monitoring.

The WCPFC needs the most improvement in the areas of verification and risk management to align with the FAO Guidelines' provisions (WCPFC implements approximately 35% of these provisions). For example, WCPFC authorizes transshipments retroactively through documentation rather than through advance verification. Data collected through transshipment declarations, observer reports and logbook reporting lacks the quality necessary for reliable catch verification. The distribution protocols also fail to get reports to relevant authorities on timelines that support MCS and their format limits practical use for compliance monitoring.

WCPFC can improve in several areas to more fully meet the FAO Guidelines:

Authorization and Notification

- Adopt specific guidelines and criteria for flag State authorization of transshipments.
- Lengthen the timeframe for pre-event notifications (36 hours prior is currently required) to support effective MCS and require pre-notifications to include time of intended transshipment activity.

Documentation and Data Sharing

- Expand the distribution of transshipment declarations to flag States, relevant coastal States, and intended landing States and the Secretariat.
- Amend the transshipment declaration to add recommended data fields from the FAO Guidelines, Annex I such as vessel contact information (name, nationality and contact information for the master and quantities onboard prior to transshipment by area, species, product form and estimated quantity.
- Shorten the submission deadlines for transshipment declarations (currently 15 days) and observer reports (currently 90-120 days) to support effective MCS.
- Expand formal procedures for sharing transshipment data between additional RFMOs to enhance public disclosure of transshipment information.

Verification and Follow-up Procedures

- Require vessels to retain transshipment records on board.
- Develop an independent Regional Observer Program to monitor transshipments.
- Establish systematic procedures to follow-up on infractions and flag State enforcement action through the WCPFC Compliance Monitoring Scheme.
- Resolve gaps in transshipment verification procedures, including for cross-referencing transshipment and landing data, pre-event verification processes and observer data.
- Develop procedures so that vessels with serious infractions are automatically included in the draft IUU vessel list.

Cross-RFMO Gaps

The gaps identified below were identified across all five RFMO transshipment measures using the benchmarking methodology described above. While individual RFMO assessments above emphasize the most specific areas in need of improvement, this section presents gaps that affect all or most RFMOs. For brevity these were not detailed in every individual RFMO assessment.

Documentation and Reporting

At present, none of the five tuna RFMOs have transshipment declarations that meet the comprehensive data field requirements specified in Annex I of the FAO Guidelines. Universal gaps include vessel owner and company contact information, transshipment authorization information (issuer, period of validity), quantities onboard prior to transshipment (area, species, form, weight) and fish remaining on board after transshipment. These missing data fields limit authorities' ability to conduct effective chain-of-custody verification and risk assessment.

Also, no tuna RFMO has implemented separate landing declarations as recommended by the FAO Guidelines. The FAO Guidelines specify that landing declarations enable authorities to "collect and cross-reference data and information on the quantity of fish landed, by species, product form, area, country of origin for processed fish, against the corresponding transshipment data and information." Where RFMOs choose not to implement separate landing declarations, they should ensure these cross-referencing functions are managed through alternative means, such as mandatory reporting of all landings to flag States and RFMOs regardless of whether prior transshipment occurred, explicit cross-referencing requirements in port State inspection procedures, and data sharing between port States and RFMOs to verify landed quantities against transshipment records. The FAO Guidelines encourage vessels to use designated ports acting in accordance with the FAO Port State Measures Agreement (PSMA), including developing State ports.

The FAO Guidelines include the provision that declarations should also be provided for container vessels that are not carrying fish, or fish that have been previously landed. Currently no RFMO has adopted provisions to regulate non-catch transfers such as fuel or supplies. This gap means supply vessel movements remain unmonitored, creating opportunities for IUU product laundering through vessels that transfer both provisions and undocumented catch.

Only the IATTC currently requires vessels to retain transshipment records on board. The other tuna RFMOs should adopt a similar requirement.

Tuna RFMOs also have varying reporting timeframes the submission of transshipment declarations (5 days is currently required in ICCAT, IATTC and IOTC; CCSBT and the WCPFC require 15 days). Given the advent of electronic reporting and satellite communication technologies, such timeframes should be shortened to support more timely data reporting and facilitate effective MCS. In any case, declarations should be submitted before any landing or subsequent transshipment is authorized.

For completeness, transshipment declaration should be required for all transshipment events, even where the vessel experienced force majeure or distress. The declarations should report the circumstances giving rise to that force majeure or distress.

Verification and Monitoring

VMS

Currently no tuna RFMO has requirements that prevents transshipments during ALC failures (i.e., when manual reporting requirements, which vary across RFMOs, are activated). RFMOs should consider adopting requirements to suspend transshipments during ALC system failures.⁹

The FAO Guidelines call for VMS reporting and transmitting VMS information to be undertaken “in near real-time” but do not define this term. Current tuna RFMO practices vary considerably.¹⁰ Position reports transmitted hourly (or less frequently) limit MCS authorities' ability to verify vessel activities in a timely manner or respond effectively to anomalies or compliance concerns. RFMOs should consider adopting more frequent VMS position report requirements (such as <1 hour) or consider such requirements for vessels or fishing activities identified through a risk-based approach.

The FAO Guidelines also call for both donor and receiving vessels intending to conduct transshipment to notify the relevant RFMO when these vessels enter and exit the RFMO area of competence. RFMOs should consider adopting such a requirement as it would assist in targeting regulatory efforts once vessels and potential at-sea transshipment activity is known to be in a particular RFMO area of competence.

AIS

While not specifically included in the FAO Guidelines, RFMOs¹¹ could require vessels to operate both VMS and Automatic Identification Systems (AIS), which would provide complementary tracking capabilities and reduce monitoring gaps, including during VMS failures. AIS broadcasts vessel position, course, and speed information that can be received by other vessels and shore-based stations, creating an independent verification layer for vessel movements. While AIS can be manually disabled and lacks the tamper-resistant features of VMS, AIS data can provide continued oversight until VMS functionality is restored, as well as oversight in VMS transmission gaps.

Observer Program Harmonization

Observer service providers operate across multiple tuna RFMOs, and the same vessel fleets work in overlapping convention areas. Observer reports are also a key source of data for monitoring and

⁹ The WCPFC Secretariat's practice is to review vessels notifying transshipments to ensure they are reporting VMS properly, and they contact flag CCMs to notify and ensure resolution prior to the transshipment event.

¹⁰ WCPFC: 4 hours for longliners in the high seas (subject to the laws of the coastal State when in exclusive economic zones); IATTC: 4 hours for longliners, 2 hours for other vessels; IOTC: 4 hours for longliners, 2 hours for other vessels; ICCAT: 1-2 hours depending on vessel type.

¹¹ Several RFMOs already require AIS for certain vessel classes. While, at present, no tuna RFMOs mandate AIS as a backup monitoring tool for vessels authorized to transship, it is an accepted part of the CCSBT Secretariat's monitoring activities.

verifying transshipments, particularly if there are discrepancies in those data. While not specifically included in the FAO Guidelines, RFMOs should consider standardizing observer qualification requirements, data collection protocols, and reporting formats. Standardized observer requirements would align with harmonized declaration formats (see recommendations below) to ensure consistent data collection.

Port State Measures

Transshipment controls and port State measures are mutually reinforcing components of an integrated MCS framework. The FAO Guidelines explicitly recognize this interdependency by recommending that in-port transshipments take place in ports operating in accordance with the PSMA.

All five tuna RFMOs have adopted regional port State measures that apply to those States that are members of the RFMO even if those States are not yet party to the PSMA. An analysis¹² of the PSM measures adopted by the five tuna RFMOs against the implementing principles and operating standards provisions of the PSMA identifies several significant gaps in these existing tuna RFMO measures, including requirements for advance notice of port entry, denial of port entry or use, minimum inspections levels, minimum standards for training of inspectors and/or inspection reports, and the scope of the measures.

Strengthening transshipment governance and port State measure implementation in parallel is therefore important for strengthening the overall MSC framework.

¹² <https://www.issf-foundation.org/about-issf/what-we-publish/issf-documents/issf-2022-07-port-state-measures-in-tuna-rfmos-benchmarking-rfmo-port-state-measures-against-the-2009-fao-psma-and-identifying-gaps/>

Recommendations

The analysis reveals that achieving comprehensive FAO Guidelines implementation requires coordinated action across two levels: (1) system-wide reforms that all RFMOs should undertake together, and (2) RFMO-specific improvements tailored to each RFMO's circumstances and regulatory structures.

The following are the recommendations for all RFMOs. Annex I provides a detailed consolidated implementation checklist that identifies the actions recommended for all RFMOs, alongside those recommendations that are specific to the individual organizations. The checklist is based on the analysis in this Report alongside these recommendations.

Recommendation 1: Authorization and Notification

- Establish minimum standards or criteria, using a risk-based approach, that flag states must follow before approving any vessel for at-sea transshipment operations (both donor and receiving) to engage in at-sea transshipment operations. Such minimum standards or criteria should include verification of vessel compliance history, VMS functionality, observer coverage capacity, and regular catch reporting.
- Require flag States to document their verification processes and share authorization decisions with RFMOs. Such frameworks also should prioritize for review vessels with compliance concerns, vessels operating across multiple RFMO areas, or vessels lacking transparent beneficial ownership information.
- Lengthen the timeframe for pre-event notifications (to 48 hours, for example) to support effective MCS. To implement the Guidelines, both vessels should make a notification specifying date, time and location, as well as quantities on board to be transhipped.
- Prohibit vessels from acting as both receiving and offloading vessels on the same trip.
- Require that carrier vessels authorized to operate in an RFMO area of competence be flagged only to Parties or Cooperating Non-Parties.

Recommendation 2: Documentation and Data sharing

- Establish standardized protocols for sharing non-public domain transshipment information between RFMOs (both tuna and non-tuna RFMOs).
- Amend transshipment declarations to meet the Annex I of the FAO Guidelines, including vessel owner and company contact information, master contact details, MMSI numbers, and comprehensive details about fish on board prior to and following transshipment operations, intended ports, next destinations, and final landing arrangements; and/or in port entry procedures. See Annex 2.
- Establish a harmonized transshipment declaration for use between and among RFMOs.
- Require landing declarations that track intended ports, destinations, and final arrangements.

- Require vessels authorized to engage in at sea transshipment to retain transshipment records on board. A copy should accompany the transshipped fish on the receiving vessel.

Recommendation 3: Verification and Follow-up Procedures

- Adopt requirements to suspend transshipments during ALC system failures and increase the frequency of VMS polling rates.
- Adopt requirements for both donor and receiving vessels intending to conduct transshipment to notify the relevant RFMO when they enter and exit the RFMO area of competence.
- Establish procedures for the flag State to confirm donated fish was taken in accordance with applicable rules.
- Strengthen procedures for cross-referencing transshipment and landing data, pre-event event verification processes and observer data by species, product form, area and country of origin.
- Establish systematic procedures to follow-up on infractions and flag State enforcement action through RFMO compliance processes.
- Develop procedures so that vessels with serious infractions are automatically included in the draft RFMO IUU vessel list.
- Require AIS as a backup monitoring tool for vessels authorized to transship at sea.
- Standardize observer qualification requirements, data collection protocols, reporting formats and control measures where there are discrepancies identified through cross-referencing sources of monitoring or verification data with data in observer reports.
- Implement effective port State measures that are in line with the implementing principles and operating standards provisions of the FAO PSMA as part of a suite of MCS tools to support effective transshipment regulation.¹³

¹³ Ibid.

Conclusions

The analysis of tuna RFMO at-sea transshipment measures against the FAO Guidelines shows that strengthening the regulation of at-sea transshipment is in transition.

There is significant variation across RFMOs in implementation. While all RFMOs have established foundational regulatory frameworks, the scope and design of these measures, as well as the associated RFMO MCS architecture, vary and for each RFMO specific reforms are needed.

The assessment findings show that basic infrastructure elements — vessel authorization, electronic reporting, and VMS requirements — have been successfully implemented across most tuna RFMOs. However, the more sophisticated elements that would result in comprehensive, effective at-sea transshipment governance remain largely, as yet, unimplemented.

The gaps in inter-RFMO coordination (between tuna RFMOs, and among RFMOs in general) are an important challenge to address. Transshipment operations routinely cross organizational boundaries, yet no formal mechanisms exist for sharing critical information about vessel movements, compliance histories, or authorization changes. This fragmentation creates opportunities for regulatory arbitrage and reduces the overall effectiveness of the global tuna management system. Also, the absence of risk-based approaches across RFMOs represents a critical opportunity, which, if implemented, would strengthen authorization of vessels that meet RFMO requirements and allow tuna RFMOs to target their limited oversight resources where they are most needed.

Global at-sea transshipment reform that address both technical gaps and systemic coordination challenges is essential. This analysis demonstrates that implementation of the FAO Guidelines is achievable; as several tuna RFMOs have made good progress in this regard. To support continuous improvement and assisting RFMOs in their efforts towards full implementation of the FAO Guidelines, this analysis informed the development of implementation checklists of actions RFMOs should take towards full implementation (Annex 1). These tools identify RFMO strengths while also providing concrete suggestions to address identified implementation gaps -- ensuring that reform efforts build on existing capabilities and existing regulatory frameworks.

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Annex 1: Closing the Gap: Needed Reforms to Implement the FAO Voluntary Guidelines

KEY:

Reforms for IATTC, ICCAT, IOTC, CCSBT, & WCPFC



All RFMOs

Reforms specific to each RFMO's operational context



CCSBT



IATTC



ICCAT



IOTC



WCPFC



Authorization & Notification



All RFMOs

4 REFORMS

- ☐ Lengthen the timeframe for pre-event notifications (e.g., 48 hours), and ensure both vessels provide a notification specifying date, time, and location and amount to be transshipped
- ☐ Establish minimum standards or criteria, using a risk-based approach, that flag States must follow before approving any vessel for at-sea transshipment operations (both donor and receiving)
- ☐ Require flag States to document their verification processes and share authorization decisions with RFMOs
- ☐ Prohibit vessels from acting as both receiving and offloading vessels on the same trip



IATTC

3 REFORMS

- ☐ Publicize transshipment information on all transshipment events – including locations, product form, and landings
- ☐ Ensure C-14-02 applies to all longline vessels engaged in at-sea transshipment
- ☐ Receiving vessels should store fish and documentation received from each donor vessel separately. That documentation should be provided to relevant authorities when required. It should be clear which donor vessel each part of the fish comes from.
Receiving vessels should maintain up-to-date stowage plans and other documents showing quantities and locations of species received from each donor vessel. Documentation should be made available to authorities and kept on board until completely unloaded.



WCPFC

4 REFORMS

- ☐ Receiving vessels should store fish and documentation received from each donor vessel separately. That documentation should be provided to relevant authorities when required. Receiving vessels should maintain up-to-date stowage plans and other documents showing quantities and location of species received from each donor vessel. This should remain on board until completely unloaded.
- ☐ Shorten the submission deadlines for transshipment declarations (currently 15 days) and observer reports (currently 90–120 days) to support effective MCS
- ☐ The observer should provide a report for all transshipment reports (beyond confirming quantities are consistent) to all competent authorities and the relevant RFMO as soon as possible.
- ☐ Develop an independent Regional Observer Program to monitor transshipments

Continued on next page



Documentation & Data



All RFMOs

6 REFORMS

- ☐ Amend the transshipment declaration to add recommended data fields from the FAO Guidelines, Annex I. The declaration should be transmitted before any landing or subsequent transshipment is authorized.
- ☐ Establish a harmonized transshipment declaration for use between and among RFMOs
- ☐ Require landing declarations that track intended ports, destinations, and final arrangements
- ☐ Require vessels authorized to engage in at-sea transshipment to retain transshipment records on board. A copy should accompany the transshipped fish on the receiving vessel.
- ☐ Establish formal procedures for sharing transshipment data between other RFMOs
- ☐ Publicize transshipment information on all transshipment events including locations, product form, and landings



Verification & Follow-Up



All RFMOs

9 REFORMS

- ☐ Develop procedures to automatically include vessels with serious infractions on the draft IUU vessel list
- ☐ Strengthen procedures for cross-referencing transshipment and landing data, pre-event verification processes, and observer data. Develop control measures that are triggered.
- ☐ Adopt requirements to suspend transshipments during ALC system failures; increase frequency of VMS polling
- ☐ Establish procedures for flag States to confirm donated fish was taken in line with applicable rules
- ☐ Adopt requirements for both donor and receiving vessels intending to transship to notify the relevant RFMO when they enter and exit the RFMO area of competence
- ☐ Establish systematic follow-up procedures through RFMO compliance processes
- ☐ Require AIS as a backup monitoring tool
- ☐ Standardize observer qualification requirements, data collection protocols, and reporting formats
- ☐ Align PSM with the FAO PSMA for all ports where receiving vessels land fish



CCSBT

2 REFORMS

- ☐ Record and publicize the list of fishing vessels authorized to transship
- ☐ Pilot Program: Rectify issues in the Pilot Program identified in the 2025 Quality Assurance Review



IOTC

2 REFORMS

- ☐ Encourage those Non-Contracting Parties that flag carrier vessels that operate in the IOTC Area of Competence, and which are allowed to continue to do so under Res. 25/05, to become IOTC Contracting Parties or Cooperating Non-Parties
- ☐ Pilot Program: Establish measures to address identified weaknesses in the pilot program

Annex 2: Comparison of Tuna RFMO Transshipment Declarations Against the FAO Guidelines

Grey – Implemented; Green = Gap

	IOTC	ICCAT	WCPFC	IATTC	CCSBT
Annex I Transshipment Declaration (for both donor and receiving vessel)					
1. Vessel name	Yes	Yes	Yes -asks for fishing vessel and its WIN and carrier vessel and its WIN	Yes	Yes
2. Flag State	Yes	Yes	Yes	Yes	Yes
3. Vessel type (ISSCFV)	Yes It is either a longliner or a carrier vessel so it is clear from the declaration which of the two that is, but it isn't done using the ISSCFV codes.	Yes, it is either a longliner or a carrier vessel so it is clear from the declaration which of the two that is, but it isn't done using the ISSCFV codes.	Asks for fishing gear used to take the fish but in not standardised format	Yes it is either a longliner or a carrier vessel so it is clear from the declaration which of the two that is, but it isn't done using the ISSCFV codes.	
4. IMO number (Required if eligible)	Yes	Yes	Yes	Yes	Yes
5. External ID, if available	Flag State licence number, if available; national register number, if available	Yes	Yes (WIN)	Yes - IATTC ID	Yes
6. Registration ID if different to 5	Flag State licence number, if available; national register number, if available	Yes		Yes	Yes
7. IRCS, if available	Yes	No	No	Yes	Yes
8. MMSI number, if available	No	No	No	No	No
9. Vessel owner/company information Name Address Contact information (email and phone number)	No	No, agent name only	No	No	No, agent name and signature only
10. Vessel contact information Name of master Nationality Phone number Email	No, name and signature only.	No, name and signature only.	No, name and signature only.	No, name and signature only.	No, name and signature only.
11. Transshipment authorization identifier, if any	No	No	Requires a unique document identifier	No	No
12. Transshipment authorization issued by	No	No	No	No	No
13. Transshipment authorization period of validity	No	No	No	No	No
14. Time and date of the transshipment Start (hour/day/month/year) End (hour/day/month/year)	Yes	Yes	Date yes (Time is only included in the e-reporting standards)	No – only seeks day, month and hour, presumably for start time.	Yes
15. Transshipment location Port/position at sea (lat/long)	No – at port or at sea only, but does not ask for lat/long when Tshipped at sea	Yes	Yes	Yes	Yes
16. VMS tracking	No details on declaration	No details on declaration	No details on declaration	No details on declaration	No details on declaration
17. *Quantities onboard prior to transshipment Catches area(s) RFMO geographical location FAO statistical Area Species (FAO/ASFIF codes) Product form (preservation and presentation type) Estimated Quantity (Weight)	No	No	Required only for the receiving vessel (quantity and geographic origin of that product)	No	No
18. *Transhipped fish Catch area(s) RFMO/Geographic location FAO statistical area Product form (preservation and presentation type) Estimated Quantity (weight)	Only product form and estimated quantity.	All except FAO statistical area	Yes PLUS date and location of the TS	Catches area(s) – EPO, WPO or overlap RFMO geographical location - Yes FAO statistical Area -NO Species (FAO/ASFIF codes) -Species required, codes not specified	All except FAO statistical area

				Product form (preservation and presentation type) - Yes Estimated Quantity (Weight)-Yes	
19.*Fish remaining on board after transhipment Catch area(s) RFMO geographical location FAO statistical area Species (FAO/ASFIS codes) Product form (preservation and presentation type) Estimated quantity (weight)	No	No	No	Not required	No
20. Observer's name and signature on board, if present	Yes	Yes	Yes	YES	Yes
21. Signature Master's signature Master's stamp and full name	No Stamp not required	No Stamp not required	No Stamp not required	No Stamp not required	No Stamp not required
If undertaken in force majeure, give reasons					
Annex II Landing Declaration	No landing declaration – transhipment declaration only.	No landing declaration – transhipment declaration only.	Not in scope for WCPFC	No landing declaration – transhipment declaration only.	No landing declaration – transhipment declaration only.
1. Vessel name					
2. Flag State					
3. Vessel type (ISSCFV)					
4. IMO Number required, if eligible					
5. External ID, if available					
6. Registration ID if different to 5					
7. IRCS, if available					
8. VMS tracking					
9. MMSI number, if available					
10. Vessel contact information Master or vessel's representative Phone number Email					
11. Vessel master name and nationality					
12. Vessel owner/company information Name Address Contact information (Email and phone number)					
13. Port State					
14. Port of landing					
15. Date and time of landing					
16. *Landed fish Catch area(s) Species (FAO/ASFIS codes) Product form (preservation and presentation type) Quantity (weight) Next destination (if applicable/available) Next mode of transport and transport ID (if applicable/available)					
17. *Fish retained onboard (not landed) Catch area(s) Species (FAO/ASFIS codes) Product form (preservation and presentation type) Quantity (weight)					
18. Competent port authority					
19. Date of inspection, if any					
20. Signature Signature vessel master Master's Stamp and full name					



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Closing the Gap

Needed Reforms to Implement the FAO Voluntary Guidelines

Benchmarked against the *FAO Voluntary Guidelines for Transshipment (2022)*

All five tuna RFMOs permit at-sea transshipment under their regulatory frameworks. Well-regulated at-sea transshipment operations can provide efficient support to fishing vessels. When poorly regulated, however, at-sea transshipment can undermine effective conservation and management and create opportunities for illegal, unreported and unregulated (IUU) fishing activities.

The *2022 FAO Voluntary Guidelines for Transshipment* provide the first global framework specifically addressing transshipment. These guidelines establish standards against which RFMOs can measure their approaches and identify areas for improvement. *ISSF Technical Report 2026-02* benchmarks the tuna RFMOs’ at-sea transshipment measures against the FAO Guidelines and shows that no tuna RFMO achieves full implementation.

This infographic identifies the areas of improvement for all RFMOs alongside targeted measures specific to individual RFMOs. Acting to implement these recommendations would bring tuna RFMO regulation of at-sea transshipment more in line with the FAO guidelines – and strengthen efforts to combat IUU.

KEY:

Reforms for IATTC, ICCAT, IOTC, CCSBT, & WCPFC

 All RFMOs

Reforms specific to each RFMO's operational context

 CCSBT

 IATTC

 ICCAT

 IOTC

 WCPFC

Authorization & Notification

 All RFMOs 4 REFORMS	 IATTC 3 REFORMS	 WCPFC 4 REFORMS
☐ Lengthen the timeframe for pre-event notifications (e.g., 48 hours), and ensure both vessels provide a notification specifying date, time, and location and amount to be transshipped ☐ Establish minimum standards or criteria, using a risk-based approach, that flag States must follow before approving any vessel for at-sea transshipment operations (both donor and receiving) ☐ Require flag States to document their verification processes and share authorization decisions with RFMOs ☐ Prohibit vessels from acting as both receiving and offloading vessels on the same trip	☐ Publicize transshipment information on all transshipment events – including locations, product form, and landings ☐ Ensure C-14-02 applies to all longline vessels engaged in at-sea transshipment ☐ Receiving vessels should store fish and documentation received from each donor vessel separately. That documentation should be provided to relevant authorities when required. It should be clear which donor vessel each part of the fish comes from. Receiving vessels should maintain up-to-date stowage plans and other documents showing quantities and locations of species received from each donor vessel. Documentation should be made available to authorities and kept on board until completely unloaded.	☐ Receiving vessels should store fish and documentation received from each donor vessel separately. That documentation should be provided to relevant authorities when required. Receiving vessels should maintain up-to-date stowage plans and other documents showing quantities and location of species received from each donor vessel. This should remain on board until completely unloaded. ☐ Shorten the submission deadlines for transshipment declarations (currently 15 days) and observer reports (currently 90–120 days) to support effective MCS ☐ The observer should provide a report for all transshipment reports (beyond confirming quantities are consistent) to all competent authorities and the relevant RFMO as soon as possible. ☐ Develop an independent Regional Observer Program to monitor transshipments

Documentation & Data

 All RFMOs 6 REFORMS		
☐ Amend the transshipment declaration to add recommended data fields from the FAO Guidelines, Annex I. The declaration should be transmitted before any landing or subsequent transshipment is authorized. ☐ Establish a harmonized transshipment declaration for use between and among RFMOs	☐ Require landing declarations that track intended ports, destinations, and final arrangements ☐ Require vessels authorized to engage in at-sea transshipment to retain transshipment records on board. A copy should accompany the transshipped fish on the receiving vessel.	☐ Establish formal procedures for sharing transshipment data between other RFMOs ☐ Publicize transshipment information on all transshipment events including locations, product form, and landings

Verification & Follow-Up

 All RFMOs 9 REFORMS	 CCSBT 2 REFORMS
☐ Develop procedures to automatically include vessels with serious infractions on the draft IUU vessel list ☐ Strengthen procedures for cross-referencing transshipment and landing data, pre-event verification processes, and observer data. Develop control measures that are triggered. ☐ Adopt requirements to suspend transshipments during ALC system failures; increase frequency of VMS polling ☐ Establish procedures for flag States to confirm donated fish was taken in line with applicable rules	☐ Record and publicize the list of fishing vessels authorized to transship ☐ Pilot Program: Rectify issues in the Pilot Program identified in the 2025 Quality Assurance Review
	 IOTC 2 REFORMS
	☐ Encourage those Non-Contracting Parties that flag carrier vessels that operate in the IOTC Area of Competence, and which are allowed to continue to do so under Res. 25/05, to become IOTC Contracting Parties or Cooperating Non-Parties ☐ Pilot Program: Establish measures to address identified weaknesses in the pilot program



Tuna RFMO Measures Regulating Transshipment

Key reforms needed for best practice and effectively managed at-sea transshipment

These reforms would meaningfully strengthen how at-sea transshipment risk is managed – moving beyond documentation toward active oversight to prevent illegal, unreported, or unregulated (IUU) fishing.

KEY:



Priority reform in place



Partial reform in place



Does not have reform in place

Regulating Transshipment: Priority Reforms Needed by RFMO	CCSBT	IATTC	ICCAT	IOTC	WCPFC
Require authorized carrier vessels to be flagged to RFMO CPC or CNM	✓	✓	✓	✓	✓
RFMOs should apply risk-based scrutiny to monitoring and verification of transshipment activity, prioritizing vessels with compliance concerns, those operating across multiple RFMO areas, and those lacking transparent beneficial ownership information	✗	✗	✗	✗	✗
Establish a harmonized transshipment declaration for use between and among RFMOs that includes all the data fields from Annex 1 of the Guidelines to be submitted to the flag States, landing state, relevant coastal states, and the RFMO Secretariat	✗	✗	✗	✗	✗
Establish formal procedures for sharing transshipment data with other RFMOs	✓	✗	...	...	✗
Adopt specific guidelines and criteria for flag State authorization of transshipments, including documenting verification processes and sharing authorization decisions with RFMOs	✗	✗	✗	✗	✗
Require 100% observer coverage (human or EM) on both the fishing vessel & the carrier vessel	✗	✗	✗	✗	✗
Establish an independent third-party Regional Observer Program to ensure all carrier vessels engaged in at-sea transshipment carry an independent observer	✓	✓	✓	... ¹	✗
Maintain public list of all vessels authorized to transship	✗	✗	✗	✗	✓
Suspend transshipments during ALC system failures and increase frequency of VMS polling rates	✗	✗ ²	✗	✗	✗
Implement effective port State measures aligned with the FAO PSMA's implementing principles and operating standard	✗	✗	✗	✗	✗
Prohibit from acting as both fishing and receiving vessel on the same trip	✗	✗	✓	✗	✗
Infractions reported to flag States and RFMO and the vessel is automatically included on Draft IUU Vessel list if sufficient action is not taken	✗	✗	✗	✗	✗

¹ Indonesia's pilot program uses national observers, not independent ROP observers, and the 2025 quality assurance review found only 26% of requirements were fully implemented.

² IATTC C-14-02 does not apply VMS requirements to all longline vessels engaged in at-sea transshipment.

Learn more:



BEST PRACTICES REPORT:
Benchmarking Tuna RFMO At-Sea Transshipment Measures Against the 2022 FAO Voluntary Guidelines: A Comprehensive Analysis



INFOGRAPHIC:
Closing the Gap: Needed Reforms to Implement the FAO Voluntary Guidelines



RFMO BEST PRACTICES SNAPSHOT:
2026: Transshipment Regulation



BEST PRACTICES REPORT:
Port State Measures in Tuna RFMOs: Benchmarking RFMO Port State Measures Against the 2009 FAO PSMA and Identifying Gaps



INFOGRAPHIC:
Key Gaps and Priorities in Tuna RFMO Port State Measures

Next scheduled review by each RFMO of its transshipment measure:

2027

- ICCAT
- IOTC
- (Review of the pilot program only)

2028

- CCSBT

No planned review

- IATTC
- WCPFC