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5-9 December 2011

**FFA MEMBERS COMMENTS ON EUROPEAN UNION PORT STATES MEASURES
PROPOSAL**

**WCPFC8- 2011- DP/07
7 November 2011**

Paper prepared by FFA Members



FFA

4 November 2011

Dr Charles Karnella
Chair
Western and Central Pacific Fisheries Commission
PO Box 2356
Kolonias
Federated States of Micronesia

Dear Dr Karnella,

FFA Members' comments on the European Union (EU) Port States Measures (PSM) proposal

At TCC7 "...CCMs were encouraged to provide any further comments to the EU by 7 November 2011 with a view to further consideration of the issue at WCPFC8...". FFA Members would like to thank the EU for their efforts in proposing a PSM CMM. Robust port state measures are a priority issue for FFA.

We see strength in the EU proposal as it provides an avenue for strengthening arrangements that apply to unlicensed fishing vessels entering ports to unload catch. However as the measure currently stands this is only a small component of its application. For licensed vessels there are insufficient and uncertain grounds for applying it within the region as there are already a robust suite of port State measures in place through WCPFC, sub-regionally, and nationally.

The goal of FFA members is to ensure control of, and data collection from unlicensed vessels, and we therefore do not agree with the approach of modelling and replicating the FAO PSM into a specific WCPFC PSM.

As FFA members identified at TCC7, we feel there is merit in undertaking a gap analysis of the existing port state measures contained in national, sub-regional and WCPFC measures so that areas of highest need can be addressed through the enhancement of existing measures. The approach used by the PEW Environment Group and previous work in the region may provide some useful input.

FFA members are committed to conducting such a gap analysis that will assess options, along with their associated costs and benefits. That analysis will enable us to develop a revised proposal for port State arrangements that addresses the gaps in our current framework. Only where necessary should there be consideration given for the creation of new WCPFC measures. Implicit in this process is that this addresses the special requirements of Small Island Developing States with implementation strategies for capacity and capability.

Please forward this letter to other CCMs. Should you or others require further information, please do not hesitate to contact Mr Mark Young (mark.young@ffa.int).

Yours Sincerely

Faalavaau Perina Sila

Chair

Forum Fisheries Committee