



**COMMISSION
FIFTEENTH REGULAR SESSION**
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TRANSHIPMENT REGULATION: REVIEW OF CMM 2009-06

**WCPFC15-2018-DP14
13 November 2018**

FFA Member CCMs



9 November 2018

Feleti P. Teo OBE
Executive Director
Western and Central Pacific Fisheries Commission
Federated States of Micronesia

Dear Feleti,

Transshipment regulation: review of CMM 2009-06

I write on behalf of the 17 members of the Forum Fisheries Agency in my capacity as the Chair of the Forum Fisheries Committee.

Insufficient regulation, monitoring and reporting of transshipment of catches of highly migratory fish stocks at sea, in particular on the high seas, contributes to distorted reporting of catches. It also exposes CCMs, and the wider Pacific region, to IUU fishing risks and transnational criminal activity. Subject to not infringing on CCMs' right to regulate transshipment occurring in areas under national jurisdiction, the Commission has a responsibility to effectively regulate transshipment activities to address these risks.

FFA Members' long-term objective regarding transshipment regulation is to facilitate all transshipments in the Convention Area occurring in port. This is consistent with Article 29(1) of the WCPFC Convention which provides that *'the members of the Commission shall encourage their vessels, to the extent practicable, to conduct transshipment in port'*. However, the current levels and regulation of high seas transshipment activity are inconsistent both with Article 29(1) and the objective of the WCPFC Convention. CCMs transshipping on the high seas have not provided evidence regarding their efforts to encourage their vessels to tranship in port.

The review of 2009-06 is long overdue. The measure was negotiated a decade ago and, more importantly, there have been notable deficiencies in its implementation and ability to sufficiently regulate transshipment activity in accordance with the WCPFC Convention. This fact was recognised by TCC14 which recommended to WCPFC15 that *'review of the existing transshipment measure (CMM 2009-06) should be a priority item in 2019'*.

FFA members strongly support this TCC14 recommendation, and encourage all CCMs to support its endorsement by WCPFC15.

FFA members commit to working proactively with other CCMs to improve the regulation of transshipment in the Convention Area starting with endorsement of the TCC14 recommendation at WCPFC15. Please forward any enquiries to the FFA Secretariat (matt.hooper@ffa.int and viv.fernandes@ffa.int).

Yours Sincerely

Tapaeru Herrmann
Chair, Forum Fisheries Committee