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Submitted by Sharks Pacific

POSITION STATEMENT

22nd Regular Session of the Western Central Pacific Fisheries Commission (WCPFC)

Manila, Philippines | December 1–5, 2025



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Sharks Pacific wishes to express its appreciation to the Western and Central Pacific Fisheries Commission (WCPFC) for the opportunity to participate in the 22nd Regular Session. We are grateful for the chance to engage with the WCPFC in our new capacity as an accredited observer and contribute to its vital role in the sustainable management of fisheries within the Western and Central Pacific Ocean (WCPO).

The positions that follow reflect key priorities for Sharks Pacific, which we believe warrant particular focus and attention at this session.

TRANSSHIPMENT

As documented and referenced by multiple authorities, highseastransshipmentremainsoneoftheprominent weaknesses in catch documentation and verification that leads to Illegal, Unreported, and Unregulated (IUU) catch in the WCPO [1, 2, 3, 4]. Additionally, because the practice of high seas transshipment is subject to limited and sporadic monitoring, control, and surveillance (MCS) due to its remote nature, it facilitates or exacerbates other potential criminal activity, including illegal trafficking of drugs, arms, and other goods [5].

Furthermore, because high seas transshipment allows vessels to stay out at sea for months or even years, it creates the conditions that enable human and labour rights abuses [6]. For these reasons, *if high seas transshipment is allowed, it must be subject to the most stringent MCS measures.*

Sharks Pacific notes that the history of the development of Conservation and Management Measure (CMM) 2009-06 regulating transshipment remains important as context. In 2009, the Republic of Marshall Islands and Nauru presented the proposal that would ultimately become CMM 2009-06 after extensive negotiations over several preceding years [7]. This followed years of increasing high seas transshipment and escalating concerns from Small Island Developing States (SIDS) of IUU facilitated by the practice. The discussion, including the spirit and intent ultimately reflected in the language of the CMM, indicated that high seas transshipment would be limited in scope at the time of the measure and intended to diminish over time as members “encouraged” vessels to offload or tranship in port, with the burden of proof to justify continued high seas transshipment placed on the members seeking to use it [8]. While CMM 2009-06 represented a heavily negotiated compromise intended to reduce transshipment as an *exception*, some

members have ignored what they agreed to and *increased* transshipment instead, making it the *rule*. These trends, and the discussions around them, have continued for at least two decades now.

With this context in mind, Sharks Pacific believes it is important to address the claims that have been brought forward by proponents of high seas transshipment. Before and after the adoption of CMM 2009-06, members that support allowing high seas transshipment have made the following claims to which we provide responses:

Claim: Transshipment in port is “impracticable.”

Response: Not one member that relies on high seas transshipment has provided even a basic vessel by vessel assessment containing any economic or operational data that demonstrates or refutes the technical, practical, logistical, or economic difference, much less impediments, to transshipment within an EEZ or in port. Thus far, members have simply insisted, without evidence, that transshipment within an EEZ or in port is impracticable. The only robust analysis of high seas transshipment impracticability assessment metrics was provided in 2024 by the Republic of Marshall Islands based on limited available data even though they do not engage in high seas transshipment.

Claim: When a longliner is operating far from port and the fishing is good it is economically more profitable to tranship on the high seas.

Response: Some large longline companies always tranship in port and this practice calls into question whether it really is “more profitable to tranship on the high seas,” particularly if you consider that much of the transshipment that occurs does so just across the border from the EEZ of a coastal state with port facilities. Furthermore, those companies that tranship in port argue that it gives them far greater control over the fishing operation, a better understanding of the product quality, actual catch amount, and control over the cost of the operation, which implies improved profitability [9].

Claim: Longline vessels cannot maintain business viability if they are not allowed to tranship on the high seas.

Response: This claim implies that in the Pacific, high seas longlining is such a marginal business that there is exceedingly scarce profitability, which history suggests that, where vessels are operating on such small margins

and concerned about profit and survivability, the likelihood of accurate and honest reporting is not only low, but those vessels are more likely to undertake IUU activity, thus reinforcing calls for either banning high seas transshipment or imposing stronger MCS provisions^[10].

Claim: Banning high seas transshipment for longline vessels will not necessarily help combat IUU fishing.

Response: The 2025 Annual Report on Transshipment Reporting acknowledges that in 2024, reporting for various transshipment obligations lacks verification due to data deficiencies and inadequate analytical capacity^[11]. This has resulted in potential unreported transshipments and inaccuracies in reporting species and quantities, which is, by definition, IUU. The WCPFC Secretariat also acknowledges potential IUU in transshipment by noting its need to refine analytical tools to help identify and investigate anomalies in reported transshipments. Thus, while improved MCS might help address those data and capacity deficiencies, banning high seas transshipment will clearly help combat IUU by driving transshipment within EEZs and in port where it is subject to greater oversight.

Claim: Members that rely on transshipment have complied with CMM 2009-06.

Response: All credible evidence suggests that the CMM provisions, as well as the “subjective and imprecise” interim guidelines developed to detail “impracticability” determinations have been used as a blanket exception, with no genuine effort to encourage transshipment or delivery in port^[12]. More importantly, it remains the case that there is no basis on which to explicitly and objectively assess the economic costs of transshipment in the high seas as opposed to in port or in the EEZ and, therefore, impracticability beyond an unsupported claim by a member. Thus, members that rely on high seas transshipment have effectively ignored the CMM and sought to maintain the status quo of transshipment as the *rule*, rather than the *exception*, in direct contravention of CMM 2009-06.

Claim: Members that rely on high seas transshipment claim that 100% observer coverage on board the carrier vessel alone ensures compliance.

Response: Many transshipment vessels operating on the high seas operate within a procedural and regulatory “grey area,” and assertions of complete (100%) observer coverage should therefore be treated with a high degree of scepticism. While the presence of transshipment observers on high seas carriers that intend to transship is governed by the requirement to carry a qualified (Regional Observer Program) ROP observer, in practice, observers deployed on vessels are frequently nationals of the same flag state as the carrier, which raises substantive

concerns regarding the verification of observer qualifications, the impartiality of monitoring activities, and the overall independence of the observer functions. Additionally, in numerous instances, observers receive payment directly from the vessel operator, which does not ensure institutional or operational independence. Such financial and supervisory arrangements constitute a clear conflict of interest, calling into question the reliability, accuracy, and integrity of the data collected by the observer. Furthermore, reports have also indicated cases in which flag state observers serve simultaneously as both crew members and observers on the same vessel, which constitutes an inherently contradictory dual role that should be explicitly prohibited under transshipment monitoring frameworks. Lastly, deficiencies in reported data concerning observer deployment, combined with the absence of automated monitoring tools that would allow the WCPFC Secretariat to determine carrier intentions as they enter the Convention Area and compliance in real time, mean that the WCPFC Secretariat cannot assure that all carriers engaged in transshipment activities on the high seas are accompanied by an independent observer. These gaps collectively undermine the transparency, accountability, and effectiveness of current high seas transshipment oversight.

Claim: Some members appear to rely on established Voluntary Guidelines for Transshipment as a justification for retaining the status quo for current transshipment practices in the WCPO.

Response: Setting aside the fact that “voluntary guidelines” constitute little more than a “suggestion” from a regulatory perspective, CMM 2009-06 in its current form does not meet many of the most minimal requirements of FAO’s Voluntary Guidelines for Transshipment. Moreover, the existence of voluntary guidelines for a practice does not on its own make that practice legally or morally defensible.

Claim: Some members rely on the accepted presence and allowance of transshipment as a practice in other Regional Fisheries Management Organisations (RFMOs) as justification to continue the status quo for current transshipment practices in the WCPO.

Response: Some other RFMOs do allow transshipment in different contexts under different approaches in other regions, subject to varying oversight and control^[13]. However, the current application of CMM 2009-06 does not meet the best practice approaches for tuna RFMOs. For example, both the International Commission for the Conservation of Atlantic Tunas (ICCAT) and Inter-American Tropical Tuna Commission (IATTC) rely on a 3rd party observer provider, which improves the coordination and deployment of observers, ensures high professional standards, and supports a higher degree of data integrity

and reliability. Most importantly, this ROP model would eliminate the inherent conflict of interest described above where an observer is serving two roles or being paid directly by the vessel they are charged to oversee. Furthermore, to be consistent with other tRFMOs, the WCPFC would need to adopt risk-based approaches, more robust event declaration requirements, event verification tools and procedures, clear authorization criteria, and prohibition of transshipment during VMS failures^[14].

Claim: Some members claim that an expansion of high seas boarding and inspection (HSBI) efforts offers a solution to create a greater level of accountability and compliance in high seas transshipment.

Response: The same members that claim requiring a vessel profiting off the region's fisheries to pull into port or tranship within an EEZ is "impracticable" also seem to believe that it is "practicable" to impose the cost of deploying patrol vessels and other resources to conduct HSBI on SIDS. This proposal simply shifts the compliance burden to SIDS in contravention of Article 30 of the Convention and CMM 2013-06 to allow proponents of high seas transshipment to continue a practice that ostensibly benefits them financially, while SIDS are forced to absorb the compliance costs of increasing HSBI.

The discussion regarding the closure of the Eastern High Seas Pocket (EHSP) during WCPFC10 in 2014 is further reflective of concerns expressed today and two decades ago regarding high seas transshipment, where the Cook Islands and French Polynesia highlighted their experience with catch misreporting and transshipment infringements in the area. FFA members also expressed concerns about the transshipment-related IUU infringements in the EHSP including compliance breaches involving VMS, sharks, and reporting requirements, as well as largely uncontrolled fishing for South Pacific albacore. What was more significant about the proposed EHSP closure discussion at WCPFC10 was that the FFA members recognised that the MCS problems created by transshipment IUU in the EHSP created a burden on SIDS. Therefore, FFA members considered that the best solution would be to close the EHSP^[15].

Sharks Pacific agrees with many members and observers that 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. ***Our preference would be to ban transshipment.*** However, if transshipment is allowed to continue, we also note and support in principle the proposal from the Pacific Islands Forum Fisheries Agency (FFA) to limit the class of vessels eligible to transship to

only those vessels that were built prior to 2010 consistent with the plain language of CMM 2009-06, paragraph 37(b). Additionally, if transshipment is allowed to continue, Sharks Pacific strongly supports "common sense" reforms and improvements for all current at-sea transshipment practices, including:

- 100% monitoring through human observers or EM provided by a 3rd party ROP observer provider on all delivering and receiving vessels operating on the high seas;
- 48 hours advance notification of all transshipments;
- monitoring and reporting of all non-fish transfers;
- timely delivery of all transshipment reports to the WCPFC; and
- strong sanctions for non-compliance.

As noted in the 2025 Annual Report on Transshipment Reporting, an estimated 25% of the longline catch of albacore, 33% of bigeye, and 37% of yellowfin were transhipped in 2024^[16]. Given the high value of this catch and the increased risk of IUU, the report highlights the importance of the need for effective monitoring and emphasises that observer protocols and data fields must be improved. The report also raises concerns about the independence of data, as in some cases an observer from the offloading vessel may also act as the observer for the receiving carrier vessel.

Lastly, given that some members believe there should be consistency with other regions, we would strongly support the WCPFC adopting an ROP model for transshipment like ICCAT and IATTC where a 3rd party observer provider provides an independent and reliable observer placement and management service. Furthermore, Sharks Pacific strongly recommends implementing the "hybrid model" currently used for the placement of independent observers within the EEZs of most Pacific Island countries. This model would significantly enhance the reliability and integrity of observer transshipment data by ensuring that qualified professional observers deployed on carrier vessels are of a different nationality than the vessel's flag state.

Therefore, Sharks Pacific strongly recommends and urges the WCPFC to:

- **Agree to either ban or heavily reform at-sea transshipment practices;**
- **Support 100% observer coverage provided by a 3rd party, independent ROP observer provider on all delivering and receiving vessels engaged in at-sea transshipment, including a requirement for the "hybrid model";**

- **Prioritise the development and application of EM for transshipment monitoring; and**
- **Support or endorse the use of technology to verify and validate transshipment activity through enhanced required use of AIS and VMS subject to no exceptions.**

SHARKS AND RAYS

As key predators and vital indicators of ecosystem health, sharks and rays (collectively “elasmobranchs”) are fundamental to maintaining the balance of marine ecosystems globally and across the Western and Central Pacific Ocean (WCPO) [17, 18, 19]. However, elasmobranchs continue to represent a disproportionately large component of annual bycatch in regional fisheries [20]. This persistent fishing impact has resulted in unsustainable mortality rates for many elasmobranchs, as evidenced by current stock assessment trends that paint a concerning picture for the future of many species [21, 22]. While Sharks Pacific acknowledges the WCPFC’s recent positive steps to prohibit shark lines and wire trace, along with guidelines promoting safe handling procedures and the use of line cutters to minimize trailing gear, we remain deeply concerned about the inadequate conservation and management of elasmobranchs throughout the WCPO region.

Specifically, Sharks Pacific maintains substantial concerns with other provisions of the Shark Conservation and Management Measure (CMM) 2024-05. We believe provisions to “stow” wire leads when “targeting tuna and tuna-like species” create unnecessary monitoring and enforcement challenges that could be avoided by simply not possessing wire leads on board. The ambiguous stowage requirements combined with low levels of monitoring, control, and enforcement result in a largely ineffective regulatory prohibition on wire leads. Sharks Pacific believes that an appropriate prohibition should be clear and unambiguous, with no provision for wire leads to be kept onboard the vessel.

Sharks Pacific would also like to raise the issue of continued shark finning in the WCPO longline fishery and the need to strengthen requirements in CMM 2024-05 to ensure shark finning does not occur [23, 24]. Alternative measures contained in CMM 2024-05 that allow binding fins to a carcass, or corresponding numbered tags on fins and carcasses, effectively prevent adequate monitoring and compliance. Further, these provisions present opportunities to high-grade fins or obscure landings of prohibited species and create other substantive opportunities that incentivize finning as evidenced in the recent MCS operation by the (?) North Pacific Guard

[25]. We concur with other NGO and member suggestions that if any fleets are able to deliver sharks with fins naturally attached (FNA) then all should be able to, leaving no need for alternative measures. Any provision that requires counting or matching fins inherently makes enforcement and compliance more difficult. The most effective solution, which is also confirmed as best practice in peer reviewed literature, is to simply require FNA, with a minimal allowance for a partial cut and fold technique to address unsubstantiated claims of crew injuries [26, 27]. Most importantly, an FNA requirement would make the jobs of our MCS professionals easier, rather than harder, which should be a primary objective of the WCPFC.

Lastly, as indicated in the recent IATTC 2nd Circle Hook Workshop (April 29–May 1, 2025), there is a growing body of evidence indicating that circle or “C” hooks perform better than equivalent standard “J” hooks at reducing mortality of vulnerable bycatch species, which, on balance, offer an overall conservation benefit based on the best science [28]. Specifically, the use of large “C” hooks results in a reduction in sea turtle mortality, particularly of highly endangered leatherback turtles [29–35]. Specifically, the use of large “C” hooks results in a reduction in sea turtle mortality, particularly of highly endangered leatherback turtles [36–39], rather than the gills or guts (internally). As a technical matter, there is strong evidence that a transition to “C” hooks would translate to improved bycatch mortality detection and mitigation as well as better overall fisheries management outcomes for most species.

Therefore, Sharks Pacific strongly recommends and urges the WCPFC to:

- **Acknowledge ongoing shark finning in the WCPFC Convention Area is incentivized and exacerbated by allowing alternative measures as evidenced by recent MCS operations;**
- **Require fins naturally attached with no exceptions;**
- **Revise the Conservation Management Measure for Sharks (CMM 2024-05), to explicitly prohibit carrying wire trace on board vessels operating in the WCPO; and**
- **Transition to circle or “C” hooks as best practice mitigation to increase post-release survivorship for elasmobranchs and other non-target species.**

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