



# Transshipment Regulation

## What Are the Rules for At-Sea Transshipment in RFMOs?

The regional fisheries management organizations responsible for highly migratory species (“tuna RFMOs”) each have measures that either regulate or prohibit the transfer of tuna between vessels at sea, and many have provisions that extend to transfers in port, including what data must be collected and reported. Regulation of transshipment is a flag State duty prescribed in the 1995 UN Fish Stocks Agreement (Article 18).

## Benefits of Regulation

The transfer of tuna at sea, without effective monitoring and data collection, undermines tuna sustainability. Unregulated, or poorly regulated, transshipment compromises the accuracy of RFMO stock assessments, provides a loophole for IUU activities and fish to enter the supply chain, and disrupts traceability and supply chain integrity. When comprehensively regulated and monitored, transshipment management measures will support rigorous traceability and help combat IUU fishing and prevent IUU fish from entering the supply chain. In addition, lawful transshipment can allow fishing vessels to remain at sea longer, thereby increasing their efficiency, because they no longer have to travel to port to offload their catch.

## How Do They Work?

Transshipment measures share four common components:

1. General provisions for the gears & vessel sizes and species covered by the measure
2. Authorization procedures (e.g., how far in advance of a transshipment activity the flag State must give notice to the RFMO)
3. Reporting requirements
4. Observer and other MCS requirements, such as VMS, port State monitoring, transshipment declarations and, in some instances, catch documentation schemes

These regulations primarily apply to at-sea transshipment activity by large-scale longline vessels.

IOTC, ICCAT, IATTC and the WCPFC have prohibited transshipment at-sea by purse seine vessels (with some exceptions); these vessels must transship in port.

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For a comprehensive review of **Transshipment in Tuna RFMOs**, please refer to [ISSF Technical Report 2021-03](#).



# Assessment of Transshipment Regulation by RFMO

## Recommended Best Practices

The following table shows the level of progress in each tuna RFMO in implementing the recommended best practices.

### Color Coding Key

Element(s) are consistent with the suggested best practices.

Some element(s) are present, but amendments or a change in procedure is needed to be consistent with best practices.

Element (s) are missing or inconsistent with best practices.

RFMO	Application				MCS, Data Reporting & Sharing							Authorization & Notifications		
	Includes all vessels operating outside their EEZ and/or in one or more EEZs	Covers all RFMO spp. and spp caught in association with regulated fisheries; all transfers of RFMO regulated spp. recorded on t'shipment declaration	Covers all spatial areas under the remit of the RFMO, including reporting in archipelagic and territorial waters <sup>1</sup>	Receiving vessels must be flagged to CPCs or CNMs	100% observer coverage (human or EM) on both the fishing vessel & the carrier vessel + Binding measure on observer safety	Require VMS and AIS; data to RFMO in near real-time; manual reporting every 4 hours in case of malfunction; carriers notify RFMO of entry and exit	Require IMO # to be authorized to transship	Prohibit from acting as both fishing and receiving vessel on the same trip	Pre & post event data provision to: RFMO, flag States, intended port or landing States, coastal States, & annual summaries	Standardise all t'shipment declaration data and formats <sup>2</sup> + Data Sharing among RFMOs <sup>3</sup>	Provide a public list of all vessels authorized to transship	Infractions reported to flag States and RFMO; if insufficient action taken vessel automatically included on Draft IUU Vessel list	Guidelines, incl. criteria, for authorizing transshipment by flag State, and a review process of authorizations	Advance notice of 48 hours provided for t'shipment
CCSBT	✗	✗ Only covers SBT	Covers only HS and EEZs	✗	100% observer coverage on carriers  ✗ Safety	✗ AIS  ✓ VMS Manual reporting required, frequency varies with RFMO Area  ✗ Not required to report entry/exit	✗ IMO # not mandatory  ✓ Included on t/doc	✗	✗ Pre event only to flag State  ✓ Post event to Sect, flag State, coastal State & landing State  ✓ Annual report	✓ Forms ✗ Data sharing	✓ List of authorized carriers public  ✗ List of fishing vessels authorized to t/ship not public	✓ Infractions reported  ✗ Included on draft IUU list	✗	✗
	✗	✓ Covers RFMO spp and those caught in association  Unclear if applicable to t/ship of IATTC managed resources outside of Convention Area  ✗ All spp recorded on t/doc	Covers only HS and EEZs	✗	100% observer coverage on carriers only  ✓ Safety	✗ AIS  ✓ VMS  ✗ Not required to report entry/exit	✗ IMO # not required of carriers	✗	✗ Pre event to flag State only  ✗ Post event to Sect & landing State only  ✓ Annual summary	✓ Forms ✗ Data sharing	✓ List of authorized carriers public  ✗ List of fishing vessels authorized to t/ship not public	✓ Infractions reported  ✗ Included on draft IUU list	✗	✗
ICCAT	✓	✓ Covers RFMO spp and those caught in association and t/ship of ICCAT managed resources outside of Convention Area  ✗ All spp recorded on t/doc	Covers only HS and EEZs	✗	100% observer coverage on carriers only  ✓ Safety	✗ AIS  ✓ VMS  ✗ Not required to report entry/exit	✓ IMO # required & included on transshipment declaration	✗	✗ Pre event to flag State & applicable coastal State  ✓ Post event to flag State, landing State & Sect  ✓ Annual summary	✓	✓ List of authorized carriers public  ✗ List of fishing vessels authorized to t/ship not public  ✓	✓ Infractions reported  ✗ Included on draft IUU list	✗	✗

<sup>1</sup> The IOTC, IATTC and ICCAT transshipment measures do not make reference to archipelagic waters and/or territorial seas in their provisions.

<sup>2</sup> IOTC, ICCAT and IATTC all have nearly identical transshipment declarations. A copy of the WCPFC declaration was not publicly available; however, a number of elements to be provided in the declaration, which are contained in Annex I of CMM 2009-06, differ from the other RFMOs.

<sup>3</sup> The WCPFC has MOUs with IOTC, IATTC and ICCAT, which provide that data and information can be exchanged consistent with the policies of each Commission. However, it is not clear if transshipment data is being shared or used to promote harmonized measures or action related to MCS.

RFMO	Application				MCS, Data Reporting & Sharing							Authorization & Notifications		
	Includes all vessels operating outside their EEZ and/or in one or more EEZs	Covers all RFMO spp, and spp caught in association with regulated fisheries; all transfers of RFMO regulated spp. recorded on t/shipment declaration	Covers all spatial areas under the remit of the RFMO, including reporting in archipelagic and territorial waters <sup>4</sup>	Receiving vessels must be flagged to CPCs or CNMs	100% observer coverage (human or EM) on both the fishing vessel & the carrier vessel + Binding measure on observer safety	Require VMS and AIS; data to RFMO in near real-time; manual reporting every 4 hours in case of malfunction; carriers notify RFMO of entry and exit	Require IMO # to be authorized to transship	Prohibit from acting as both fishing and receiving vessel on the same trip	Pre & post event data provision to: RFMO, flag States, intended port or landing States, coastal States, & annual summaries	Standardise all t/shipment declaration data and formats <sup>5</sup> + Data Sharing among RFMOs <sup>6</sup>	Provide a public list of all vessels authorized to transship	Infractions reported to flag States and RFMO; if insufficient action taken vessel automatically included on Draft IUU Vessel list	Guidelines, incl. criteria, for authorizing transshipment by flag State, and a review process of authorizations	Advance notice of 48 hours provided for t/shipment
IOTC	✗	✓ Covers RFMO spp and those caught in association ✗ Not applicable to t/ship of IOTC managed resources outside of Convention Area ✗ All spp recorded on t/doc	Covers only HS and EEZs	✗	100% observer coverage on carriers (note pilot for Indonesia wooden vessels) ✗ Safety	✗ AIS ✓ VMS ✗ Not required to report entry or exit	✗ IMO # not required	✗	✗ Pre event to flag State and applicable coastal state only ✓ Post event to flag State, landing State and Sect ✓ Annual summary	✓ Forms ✗ Data sharing	✓ List of authorized carriers public ✗ List of fishing vessels authorized to t/ship not public	✓ Infractions ✗ Included on draft IUU list	✗	✗
WCPFC	✓	✓	Covers only HS and EEZs (some exceptions apply)	Except when non-member flagged vessel is under charter, lease or other arrangement ✓ Safety	100% observer coverage on carriers or offloading vessel <sup>7</sup> only ✓ Safety	✗ AIS ✓ VMS ✗ Not required to report entry or exit	✓ IMO # required ✓ IMO # included on transshipment declaration	✗	✗ Pre and post event only to Sect ✓ Annual summary	✗	✓ Infractions reported ✗ Included on draft IUU list	✗ In 2017, mandated to develop guidelines for "impracticability" of not transshipping at sea; no progress to date	Requires 36 hour advance notice	



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<sup>5</sup> IOTC, ICCAT and IATTC all have nearly identical transshipment declarations. A copy of the WCPFC declaration was not publicly available; however, a number of elements to be provided in the declaration, which are contained in Annex I of CMM 2009-06, differ from the other RFMOs.

<sup>6</sup> The WCPFC has MOUs with IOTC, IATTC and ICCAT, which provide that data and information can be exchanged consistent with the policies of each Commission. However, it is not clear if transshipment data is being shared or used to promote harmonized measures or action related to MCS.

<sup>7</sup> Paragraph 13(a) of CMM 2009-06 states, "for transshipments to receiving vessels less than or equal to 33 meters in length, and not involving purse seine caught fish or frozen longline caught fish, 100% observer coverage starting on the effective date of this Measure, with the observer(s) deployed on either the offloading vessel or receiving vessel."