

## **Transshipment in Tuna-RFMOs and Mechanisms to Support Best Practices in Tuna Fisheries**

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## OVERVIEW

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1. The objective of the International Seafood Sustainability Foundation (ISSF) is to improve the sustainability of global tuna stocks by developing and implementing verifiable, science-based practices, commitments and international management measures such that tuna fisheries can meet the Marine Stewardship Council (MSC) certification standard without conditions. ISSF also cooperates with and supports regional fisheries management organizations (RFMOs), and advocates to RFMO members for the adoption and implementation of science-based management measures so that tuna stocks and their ecosystem are managed comprehensively and sustainably. Processor, importer and trader support for tuna products that are transshipped in port and therefore monitored and reported, is a significant step towards achieving sustainable fisheries management. To ensure tuna purchased and supplied by ISSF members is both of high quality and sustainable, accountability is needed to ensure the reliability of the product's origin. The transfer of tuna between vessels at sea compromises the traceability of that product, as well as the accuracy of the data collected. By encouraging the cessation of at-sea transshipments, including those in archipelagic waters, territorial seas and Exclusive Economic Zones (EEZs) ISSF Participating Companies<sup>1</sup> will be supporting better practices in tuna fisheries, combating of illegal, unreported, and unregulated fishing (IUU) for tuna; expanding data collection to ensure that total catch is accurately reported within a reasonable time period; advancing transparent and timely monitoring, control and surveillance mechanisms to improve compliance with management measures; and improving in the health of all tuna stocks.

2. Currently, all tuna Regional Fishery Management Organizations (t-RFMOs) have in place measures to regulate and monitor at-sea transshipment of tuna and tuna-like products. Although these measures were developed in a manner that takes into account the need to have uniformity of such regulations across ocean basins, the unique culture of the fisheries and member nations of each t-RFMO led to differences among these measures, and in the standards to which flag States and fishing nations are held. This paper outlines the details and implications of transshipment-related measures currently in force, and highlights areas in which the monitoring and regulation of transshipment operations could be improved. The most obvious is the removal of a variety of exemptions that allow purse seine vessels to transship at sea in some parts of the Convention area of the Western and Central Pacific Fisheries Commission (WCPFC) and ensuring transshipments of the other t-RFMOs, even those occurring in port, are documented and/or observed.

## COMMON COMPONENTS OF TRANSSHIPMENT MEASURES

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3. The transshipment measures of the t-RFMOs share common components: general provisions, authorization procedures, reporting requirements, and observer requirements. Table 1 outlines the similarities and differences among t-RFMO transshipment measures,

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<sup>1</sup> See ISSF Resolution 13-02 (<http://iss-foundation.org/2013/11/17/resolution-13-02-to-amend-resolution-13-01-to-establish-multi-annual-commitments/>)

specifically as they pertain to the above components. Generally, the measures adopted by Inter-American Tropical Tuna Commission (IATTC), the International Commission for the Conservation of Atlantic Tuna (ICCAT), and the Indian Ocean Tuna Commission (IOTC) are very similar with respect to their requirements under these categories. Transshipment measures in these RFMOs include an explicit requirement that transshipment of tuna and tuna-like species take place in port, and outlines procedures by which member nations may, should they choose to do so, authorize large-scale tuna longline vessels (LSTLV) to transship at sea. Consequently, at-sea transshipment of tuna caught by purse seine vessels in the ICCAT, IATTC and IOTC Convention is prohibited.

### **CCSBT Case**

4. The transshipment measure of the Commission for the Conservation of Southern Bluefin Tuna (CCSBT) differs from those of ICCAT, IATTC and IOTC in that it essentially establishes a monitoring program for at-sea transshipments. It does not explicitly prohibit transshipment of tuna at sea, but instead sets forth a procedure to monitor and collect data on tuna that are transshipped from LSTLVs at sea. Reporting is not required for tuna transshipped from LSTLVs in port, nor are there provisions in the CCSBT measure to restrict or monitor activities of other vessel types that may be transshipping at sea.

### **Applicable Vessel Size**

5. Given that the majority of t-RFMO transshipment measures focus on LSTLV specifically, it is important to have a clear understanding of the vessels falling into this category. Traditionally, LSTLV were defined by t-RFMOs as longline vessels greater than 24m in length overall (LOA).

6. IATTC, ICCAT and IOTC all have adopted measures that identify LSTLVs as those vessel 24m or great LOA. Recently however, some RFMOs have modified other measures to account for an increasing number of vessels just short of 24m operating in the RFMO Convention Area (i.e., ICCAT in 2011). These vessels have similar fishing capabilities, but were/are exempt from certain conservation and management measures. As efforts continue to better define “large-scale” vessels, inconsistencies are developing with respect to how t-RFMOs define large scale fishing vessels (“LSFV”) as well as LSTLV across various management meaasures. Table 2 details the differences among the definitions t-RFMOs currently have in place and how they may, or may not, be defined in their respective transshipment-related measures.

7. In addition, with respect to ICCAT, Recommendation 12-06 is only applicable to large-scale pelagic longline vessels (LSPLVs), which are defined as those greater than 24 meters LOA. In contrast, through Recommendation 11-12, ICCAT requires all fishing vessels 20 meters LOA or greater (termed “LSFVs”) that are authorized to fish for tuna and tuna-like species in the Convention Area to be on the ICCAT Record. LSFVs not on the ICCAT Record are not deemed authorized to fish for, retain on board, transship or land tuna and tuna-like species. Therefore, the discrepancy in vessel size between the two Recommendations could be providing a loophole for unregulated transshipment at sea by

longline vessels greater than 20 m LOA but less than 24 m LOA. These vessels are to be on the ICCAT Record, but are not covered by the ICCAT transshipment regulations.

### **WCPFC**

8. In contrast to the other t-RFMOs, the WCPFC has adopted an entirely different approach to transshipment and management of highly migratory species. It should be noted that certain aspects of the WCPFC Convention raise ambiguities in respect to the scope of the Commission's jurisdiction (see Parris *et al.* 2010). Specifically, Articles 7 and 8 recognize the sovereignty of coastal states over their territorial and archipelagic waters but also indicate that conservation and management measures should be compatible between those waters and the high seas. As far as management of transshipments is concerned, there is no evidence that measures in waters under national jurisdiction for all WCPFC members are compatible with those on the high seas (i.e. the measures adopted by WCPFC).

9. Instead of differentiating between at-sea transshipments and those required to occur in port, the WCPFC measure divides the management of transshipment activities among three areas: in port; at sea within an EEZ ("in zone"); and on the high seas. Although WCPFC requires submission of a transshipment declaration for all transshipments occurring in the Convention area, the time frame in which to submit the declarations is not generally specified. Further, observers are only required for those transshipments occurring at sea, not in port, and notifications or approvals to transship at sea in zone are not required by the Commission. Transshipment on the high seas is more strictly regulated than those occurring in zone. Purse seine vessels are prohibited from transshipping on the high seas, while longline, pole and line and troll vessels may only engage in transshipment activities on the high seas if granted an exemption by their flag State, and then approved by the Commission. Lastly, tuna captured exclusively within archipelagic waters or territorial sea are allowed to be transshipped (at sea) in those waters and is exempt from the WCPFC transshipment measure entirely, including the requirements to carry observers and submit transshipment declarations. A comparison of how t-RFMOs regulate transshipment by various vessel types is further outlined in Table 3.

### **Observer and VMS Requirements**

10. Observer coverage requirements for transshipment vary across the t-RFMOs by gear type. In all of the five t-RFMOs observers are required for large-scale longline transshipments at sea (see Table 3). Only the WCPFC requires observer coverage for all gear types: purse seine, small and large-scale longline, pole and line and troll vessels. In contrast, in all five t-RFMOs, carrier vessels that are authorized to transship at sea are required to install and operate a satellite vessel monitoring system (VMS) in accordance with the applicable RFMO measure.

### **Species Coverage**

11. The IOTC, ICCAT and IATTC transshipment measures were all amended in 2012 to, among other things, explicitly include the transshipment of sharks. The WCPFC measure

continues to cover oceanic shark species through the incorporation of Annex I of the UN Convention on the Law of the Sea in its definition of highly migratory fish stocks.

**Table 1.** Comparison of the common components of transshipment-related measures in the five t-RFMOs.

RFMO	Recommendation/Resolution no.	General Provisions	Authorization Procedures	Reporting	Observer Requirements	VMS Requirements
CCSBT	N.A. Adopted at 15th Annual Meeting: October 2008		24 hour prior notification	F/V: 15 days post transshipment to flag State. <b>Carrier:</b> 24hrs post transshipment to F/V flag State and Secretariat.	Required on <b>all carrier</b> vessels. Includes provisions allowing for observer to board F/V.	Required per the T-RFMO measure in the Convention Area in which SBT vessels are fishing.
IATTC	Resolution C-12-07 Amending Resolution C-11-09	Includes explicit requirement to transship in port. Troll, pole and line and vessels engaged in the transshipment of fresh fish are exempt.  <b>Explicitly covers tuna and tuna likes species and sharks.</b>	24 hour prior notification	F/V: 15 days post transshipment to flag State. <b>Carrier:</b> 24hrs post transshipment to F/V flag State and Director. 48 hrs prior to landing to the CPC where the landing is to take place. Requires transshipment declarations for <b>in port</b> transshipments involving <b>LSTLV</b> .  All tuna and tuna-like species and sharks <b>landed in, or imported</b> into, the territory or area of a CPC, either unprocessed or after having been processed on board and which are transshipped, <b>must be accompanied by the IATTC transshipment declaration until the first sale has taken place.</b>	Required on <b>all carrier</b> vessels. Includes provisions allowing for observer to board F/V.	Required on <b>all carrier</b> vessels authorized to transship at sea

ICCAT	Recommendation 12-06, amending 06-11	<p>Includes explicit requirement to transship in port.</p> <p><b>Explicitly covers tuna and tuna-like species and other species caught in association with these species.</b></p>	24 hour prior notification	<p><b>F/V:</b> 15 days post transshipment to flag State. <b>Carrier:</b> 24hrs post transshipment to F/V flag State and Director. 48 hrs prior to landing to the CPC where the landing is to take place. Requires transshipment declarations for <b>in port</b> transshipments involving <b>LSTLV</b>.</p> <p>All tuna and tuna-like species and any other species caught in association with those species <b>landed in or imported</b> into the area or territory of CPCs, either unprocessed or after having been processed on board and which are transshipped, <b>must be accompanied by the ICCAT transshipment declaration until the first sale has taken place.</b></p>	Required on <b>all carrier</b> vessels.	Required for <b>all</b> carrier vessels authorized to transship at-sea and for all LSPLVs which transship at sea.
IOTC	Resolution 12/05, amending 11/05	<p>Includes explicit requirement to transship in port.</p> <p><b>Explicitly covers tuna and tuna-like species and other species caught in association with these species.</b></p>	24 hour prior notification	<p><b>F/V:</b> 15 days post transshipment to flag State. <b>Carrier:</b> 24hrs post transshipment to F/V flag State and Director. 48 hrs prior to landing to the CPC where the landing is to take place. Requires transshipment declarations for <b>in port</b> transshipments involving <b>LSTLV</b>.</p>	Required on <b>all carrier</b> vessels. Includes provisions allowing for observer to board F/V.	Required on <b>all carrier</b> vessels authorized to transship at sea

				All tuna and tuna-like species and sharks <b>landed or imported</b> into the CPCs either unprocessed or after having been processed on board and which are transhipped, <b>must be accompanied by the IOTC transshipment declaration until the first sale has taken place.</b>		
<b>WCPFC</b>	Conservation and Management Measure CMM-09-06	<p><u>Exempts</u> fish both caught and transhipped in archipelagic waters or territorial seas. Prohibits transshipment by purse seine vessels on the <b>high seas</b>.</p> <p><b>Covers tunas and tuna like species and oceanic shark species.</b></p>	<p><b>IN PORT:</b> No notification or authorization required by Commission for transshipment. <b>PURSE SEINE:</b> none for at sea transshipment in archipelagic waters or territorial seas if fish have been harvested there. Commission approval for at sea within EEZs (for PNG, Philippines and NZ). <b>LONGLINE, POLE AND LINE, AND TROLL:</b> none for transshipment at sea within EEZs. Commission approval required for transshipment on high seas.</p>	<p>Declarations required for all transshipments in the Convention area by both fishing and carrier vessels to their flag State, except for transshipments on the high seas and instances of <i>force majeure</i> when they are sent to the Director. <b>LONGLINE, POLE AND LINE, AND TROLL on HIGH SEAS:</b> due within 15 days. <b>ALL OTHERS:</b> time frame for submitting declaration not specified.</p>	<p><b>IN PORT:</b> observers <b>not</b> required. <b>AT-SEA:</b> transshipments have a <u>three part approach</u>: (1) for transshipment <b>to carriers equal to or &lt;33m</b> the observer can be on either vessel. (2) By 2013: 100% coverage of transshipments involving fish caught by <b>pole and line or toll vessels</b>. Observer on the carrier. (3) All <b>other</b> transshipment activities: observers required on carrier vessel.</p>	<p>Required for all fishing vessels (as defined by the WCPFC Convention, which includes transshipment) that must be on the Vessel Record and covered by the VMS CMM.</p>



**Table 2.** Comparison of definitions for "large-scale fishing vessel" (LSFV) and "large-scale tuna longline vessel" (LSTLV) by t-RFMO.

<b>t-RFMO</b>	<b>Definitions of LSFV and LSTLV</b>
<b>CCSBT</b>	In 2008 CCSBT repealed the resolution that established a register of vessels >24m and created instead a register for all vessels, regardless of size. The 2008 transshipment measure defines LSTLV as longline vessels with freezer capacity.
<b>IATTC</b>	C-03-07 established a list of large-scale longline vessels, (LSTLV) which were defined as those >24m LOA. C-12-07 (transshipment) defines LSFV as those vessels fishing beyond areas of national jurisdiction or beyond CPC-controlled areas. A definition for LSTLV is not specified in C-12-07, one can infer they fall under the definition for LSFV.
<b>ICCAT</b>	Recommendation 12-06 defines large-scale pelagic longline vessels (LSPLVs) as those > 24 meters length overall. Recommendation 11-12 requires all fishing vessels 20 meters in length overall or greater ("large scale fishing vessels" or "LSFVs") authorized to fish for tuna and tuna-like species in the Convention Area to be on the ICCAT record.
<b>IOTC</b>	Resolution 02-05 established LSFV as vessels >24m LOA. Resolution 02-06 implied that LSTLV fall under the category of LSFV. No changes have been made to 24m definition of "large-scale".
<b>WCPFC</b>	The transshipment measure from this RFMO does not differentiate between large-scale and small-scale longline vessels. There is no mention of "large-scale" fishing vessels in the Convention text or in measures relating to establishment of vessel register or IUU vessel list.

**Table 3.** Comparison of t-RFMO measures to regulate and monitor transshipment activities according to vessel type.

Vessel Type	t-RFMO	Transshipment declaration required?	Observer required?	At-sea transshipment prohibited?
purse seine	CCSBT	NO	NO	NO
	IATTC	NO	NO	YES
	ICCAT	NO	NO	YES
	IOTC	NO	NO	YES
	WCPFC	YES- except for fish both caught and transshipped inside archipelagic waters or territorial seas	YES- except for transshipments occurring in port, or for at-sea in zone transshipments involving fish both caught and transshipped inside archipelagic waters or territorial seas	YES - However, there are exemptions allowing some vessels from New Zealand, Philippines and Papua New Guinea to transship at-sea within zone. Fish both caught and transshipped in archipelagic waters or territorial seas are also exempt.
large scale longline*	CCSBT	YES- but only for at sea transshipments	YES- but only for at sea transshipments	NO
	IATTC	YES	YES	NO
	ICCAT	YES	YES	NO
	IOTC	YES	YES	NO
	WCPFC	YES	YES	NO
small longline	CCSBT	NO	NO	NO
	IATTC	NO	NO	YES- except for fresh fish transshipments
	ICCAT	NO	NO	YES- except for small-scale albacore F/V
	IOTC	NO	NO	YES
	WCPFC	YES	YES	NO
pole and line	CCSBT	NO	NO	NO
	IATTC	NO	NO	NO
	ICCAT	NO	NO	YES
	IOTC	NO	NO	YES
	WCPFC	YES	YES- starting in 2013	NO
troll	CCSBT	NO	NO	NO
	IATTC	NO	NO	NO
	ICCAT	NO	NO	YES
	IOTC	NO	NO	YES
	WCPFC	YES	YES- starting in 2013	NO

\* See Table 2 for details on how each RFMO defines large-scale longline vessel.

## CONTEXT FOR REGULATING TRANSSHIPMENT ACTIVITIES

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11. There are a variety of international instruments that speak to the need to monitor and regulate transship activities, especially those taking place at sea. To identify ways in which t-RFMOs should, or could, improve transshipment-related measures, it is important to understand the standards established by their respective Conventions and other international instruments. Measures adopted by t-RFMOs should mirror, to the greatest extent possible, the guidelines provided in the instruments described below.

12. **The United Nations Fish Stocks Agreement (UNFSA)** outlines responsibilities of fishing nations, fishing vessels and RFMOs. Article 18 of Part IV of UNFSA, outlines duties of flag States and suggests *supervision* of transshipment activities to verify catch of target and non-target species, as well as *regulation of transshipment on the high seas* to ensure the effectiveness of conservation and management measures. Additionally, Article 6 of Annex I pertaining to requirements for the collection and sharing of data, recommends establishment of transshipment *reports* to verify fisheries data. Under the **International Plan of Action to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated fishing (IPOA-IUU)**, flag States are encouraged to ensure that all their fishing, transport and support vessels involved in transshipment at sea have *obtained a prior authorization* issued by themselves, and to *report* to the national fisheries administration or other designated institution the required information about operations.

13. With respect to the **t-RFMO Conventions** themselves, WCPFC is the only RFMO with a Convention that addresses transshipment activities. The WCPFC Convention defines “transshipment” as “the unloading of all or any of the fish on board a fishing vessel to another fishing vessel either at sea or in port” and also includes transshipment in its definition of “fishing”. The Convention tasks WCPFC members to *encourage their vessels to transship in port* and explicitly tasks the Commission to “develop procedures to obtain and *verify data* on the quantity and species transshipped *both in port and at sea* in the Convention Area, and procedures to *determine when transshipment covered by this Convention* has been completed.” Further, Article 4 under Annex III of the Convention, which outlines “terms and conditions for fishing,” requires vessel operators to cooperate in the *observation and inspection* of transshipments and encourages such inspections to minimize disruption of fishing activities as much as possible.

14. Although the t-RFMOs, other than WCPFC, do not directly address transshipment in their Conventions, the joint meeting of the t-RFMOs, commonly referred to as the “Kobe process” have provided recommendations with respect to transshipment of tuna and tuna-like products. The second joint meeting of the t-RFMOs (**Kobe II**) recommended: (1) cooperation among t-RFMOs to *standardize transshipment declaration* forms so that they use, to the maximum extent possible, the same format and include the same required data fields, (2) developing minimum standards for the *timeframes* by which transshipment declarations are submitted to RFMO Secretariats, flag States, coastal States, and port States; and (3) *requiring advance notifications* be provided to the relevant tuna RFMO Secretariat for *high seas* transshipment activities permitted by that RFMO’s (for example 36 hours in advance of the transshipment operation taking place).

## CONSLUSIONS AND RECOMMENDATIONS

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15. To further promote and support best practices in tuna fisheries, ISSF has established a goal of abstaining from purchasing tuna products that are caught by purse seine vessels and transshipped at sea. Presently WCPFC is the only t-RFMO that allows, in some instances, purse seine vessels to transship tuna and tuna-like products at sea. The WCPFC transshipment measure is of interest in that it not only allows purse seine vessels to transship at sea, but this measure also does not require observers or transshipment declarations for tuna caught and transshipped in archipelagic waters or territorial seas. That said, after reviewing all the t-RFMO transshipment related measures it is evident that each has room for significant improvement. IATTC, ICCAT and IOTC specifically need to expand their measures to require monitoring and reporting of transshipment activities from vessels other than LSTLV and carriers, and to ensure their current definition of LSTLV does not inadvertently exclude vessels from transshipment regulations. Detailed recommendations for improving t-RFMO transshipment measures are included below.

16. **Require all purse seine vessels to submit transshipment declarations.** A review of the t-RFMO transshipment measures indicates there is much work to be done to harmonize these measures. Given the goals of (1) eliminating IUU fishing and (2) collecting accurate data to ensure tuna products can be tracked and accounted for, transshipment declarations need to be required for all transshipments from purse seine vessels, regardless of where transshipment occurs. Presently, none of the t-RFMOs, except WCPFC, require purse seine vessels to submit transshipment declarations. Further consideration should also be given to where the declarations are submitted, preferably to the Secretariat/Director of the Commission. Other related improvements would be to require all longline vessels, not just LSTLV, to submit transshipment declarations.

17. **Transshipments for longline and purse seine vessels should be observed, especially those occurring at sea.** Presently, the majority of transshipment measures are limited to LSTLV. The t-RFMOs should consider requiring transshipments from purse seine and non-freezer/large-scale vessels to be observed, whether they occur at sea, or in port. Given carrier vessels are required to carry observers to monitor transshipments from LSTLV, it is unclear if the additional costs of observing transshipments from purse seine vessels and from non-LSTLVs would be prohibitive. Additional observer requirements are needed in WCPFC. The exemptions currently in place in this RFMO means that quantities of tuna transshipped in archipelagic waters and territorial seas in the WCPFC are not verified by a third party, or require to be reported to the Commission. Additionally, WCPFC does not require observers to supervise transshipments from LSTLV, or other vessel types, as long as the transshipments occur in port.

18. **Elimination of exemptions in WCPFC measure.** As mentioned above, WCPFC exempts tuna caught and transshipped in archipelagic waters and territorial seas from the provisions of the transshipment measure, including reporting on the quantity and species transshipped. In addition to the exemption for fish caught and transshipped in archipelagic waters or territorial seas, WCPFC allows some member nations to apply for exemptions for purse seine vessels to transship at-sea in zone. These exemptions are based on historical

operations as well as economic hardships fleets would incur if they were required to return to port to transship. The WCPFC Convention specially mentions exemptions for purse seine vessels to transship at-sea may be adopted to reflect historical operations; otherwise transshipment at-sea by purse seine vessels is prohibited. Presently, New Zealand is the only fishing nation that has applied for an exemption, requesting approval for 10 of their purse seine vessels to transship whole frozen skipjack at-sea for five years, from 2012 through 2016. Attention is needed to ensure the Philippines and Papua New Guinea, also authorized by the WCPFC transshipment measure to receive an exemption, submit the required information and that such exemptions, including that of New Zealand, are reviewed to ensure they are necessary and do not undermine the conservation and management of WCPFC tuna resources.

**19. Develop a standard definition for large-scale longline fishing vessel.**

IATTC and ICCAT have adopted, inadvertently or not, different definitions for large-scale tuna **fishing** vessels (LSTFV or LSFV) and large-scale **tuna longline** vessels (LSTLV) within their respective Commissions. IATTC included a footnote in their transshipment resolution, C-12-07 that created a unique definition of LSTFV for that resolution specifically: “For the purposes of this measure, large-scale tuna fishing vessels are defined as all vessels fishing beyond areas of national jurisdiction or beyond each CPC-controlled areas and targeting tuna or tuna-like species”. This is in comparison to definition of LSTLV included in IATTC’s resolution C-03-07, which encompasses vessels equal to or greater than 24m LOA.

20. ICCAT, through Recommendation 11-12, lowered the minimum LOA for vessels that must be on the ICCAT Vessel Record to operate in the Convention area from 24m to 20m. This modification consequently also led ICCAT to change its definition of LSFV to encompass vessels equal to or greater than 20m LOA. However, the ICCAT transshipment Recommendation (12-06) applies only to large-scale pelagic longline vessels (LSPLVs), which it defines as those greater than 24 meters LOA. The discrepancy between the ICCAT definition of those vessels that are to be on the ICCAT Record as authorized to fish and the vessel sizes covered by ICCAT’s transshipment recommendation (Rec. 12-06) may have inadvertently created a loophole, allowing vessels between 20-24m to transship at sea, free from observer or reporting requirements in ICCAT. Additionally, IATTC’s definition of LSFV makes it unclear if IATTC vessels greater than 24m, but fishing within an EEZ could transship at sea without being held to observer or reporting requirements as well. These issues may or may not effect how transshipment measures are implemented. Regardless, RFMOs, perhaps through the Kobe process, should harmonize definitions of LSFV, and clarify if that definition applies to LSTLV as well.

**21. Adherence to KOBE recommendations.** As mentioned above, the joint meetings of the t-RFMOs have made specific recommendations regarding the management of transshipment activities, including standardizing forms and information collected on transshipment declarations, and developing data sharing and confidentiality procedures among t-RFMOs. There is still much progress to be made in this regard, which would require collaboration and efforts from all of the t-RFMOs. Regarding specific improvements needed to achieve the Kobe recommendations, WCPFC needs to establish a specific timeframe by which transshipment declarations should be transmitted. Presently,

WCPFC does not have an official transshipment declaration form, only a list of information that is required to be submitted. Requirements for when declarations are to be submitted to the Secretariat/Director versus the flag State of the fishing vessel also need to be standardized across the t-RFMOs, with perhaps an increased number of declarations being submitted directly to Secretariats/Directors.

**22. Clarify authorization process for at-sea transshipments.** The transshipment measures adopted by CCSBT, IATTC, ICCAT, and IOTC are specifically focused on LSTLV. In addition to expanding their requirements for submission of transshipment declarations to other vessels types, as outlined under paragraph 16, these t-RFMOs should also consider clarifying the mechanism by which their LSTLV receive authorization to transship at sea. As the measures are currently written, fishing vessels are simply required to notify their flag State of their intent to engage in transshipment at sea. A process for authorizing such activities is not clearly outlined and there is little, or no Commission oversight regarding criteria used to approve “requests”.

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