

March 13, 2014

Mr. Stefaan Depypere, ICCAT Chairman
Director, International Affairs and Markets
European Commission, DG Maritime Affairs and Fisheries
Rue Joseph II 99; 03/10, 1049 Brussels, Belgium

Mr. Driss Meski
Executive Secretary
International Commission for the Conservation of Atlantic Tunas
Calle Corazon de Maria, 8, Sixth Floor 28002
Madrid, Spain

Dear Chairman Depypere and Mr. Meski:

This letter is submitted on behalf of non-governmental organizations (NGOs) that either currently participate in ICCAT Meetings, or may seek to in the future. We are writing to bring to the attention of the Commission our views on what we see as a concerning trend regarding the level of transparency and openness in ICCAT Meetings and information sharing.

The ICCAT Commission is among the most open regional fisheries management organization (RFMO) commissions, and Recommendation 05-12 (Guidelines and Criteria for Granting Observer Status at ICCAT Meetings) sets a high standard regarding transparency and observer participation. However, we wish to bring to the attention of the Commission that these Guidelines are not being followed in full with respect to the provision of information and documentation.

Paragraph 8 of the Guidelines state: "All observers admitted to a meeting shall be sent or otherwise receive the same documentation generally available to Contracting Parties and their delegations, except those documents deemed confidential by the Parties."

In contrast to this provision, ICCAT Meeting papers are made available in advance of the meetings only via a password protected website and accredited observers are not given the password/link for this website. Posting of information on a secure website, and limiting distribution of the passwords to access meeting documentation to only CPCs, should only be employed when there is a clearly defined need to ensure the confidentiality or security of information discussed in accordance with agreed rules and procedures.

As a result, we respectfully request that the Commission implement fully paragraph 8 of the Guidelines for observers. Further, if meeting documentation is to be maintained on a secure website, we request that accredited observers be provided with the password/link in advance of the ICCAT meetings at the same time as CPCs.

In addition, the 2013 Provisional Commission Report records a discussion where the role of NGOs in ICCAT science was questioned. In particular, the report includes the following sentiment that was expressed by a delegate: "While it was recognised by all that inclusiveness

and transparency were vital, it was suggested that some rules may be necessary to limit excessive external influences on ICCAT science."

We agree that excessive *non-scientific* influences on ICCAT science or the work of the SCRS should be avoided. However, the participation of NGO scientists in the work of the SCRS should not be unduly restricted or curtailed. The participation of NGO scientists provides additional valuable expertise and input, promotes transparency and contributes to an open and robust discussion scientific issues. The current observer Guidelines clearly outline the conditions under which NGOs may participate in ICCAT Meetings. We do not believe more restrictive rules are warranted or would be appropriate for scientific meetings.

We respectfully request that the ICCAT Commission urgently implement in full paragraph 8 of the observer Guidelines so that accredited observers may access meeting documentation in advance of ICCAT Meetings. Further, we urge the ICCAT Commission to ensure that the participation of NGO scientists in the SCRS meetings is not eroded.

We kindly request your urgent attention to these very important issues.

Sincerely,

Alex Small



Samuel Hill



John H. Lee



Liam A. Hark

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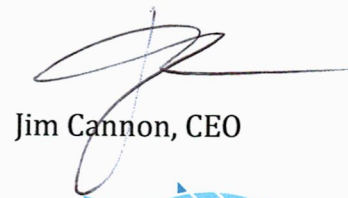


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