



RE: Concern over lack of observer coverage on fishing trips and transshipment in the tuna RFMO Convention Areas.

We recognise that during this global climate of the Covid-19 pandemic that measures taken to protect human safety may be inadvertently creating issues for fishery sustainability. It has been necessary for some tuna Regional Fisheries Management Organisations (RFMOs) to suspend the requirement for human observers to be present on fishing trips or to witness transshipment on the high sea or in port, in some cases at least until the last quarter of this year or in others for the foreseeable future. This is particularly an issue for purse seiners, where 100% observer coverage is required by the majority of RFMOs.

We understand the need for caution and increased practices to ensure the health and safety of all personnel who are involved with fishing operations; however, the temporary suspension of certain observer coverage requirements is concerning due to the potential for other illegal practices as a result of reduced surveillance.

According to the International Seafood Sustainability Foundation (ISSF), transshipment is “the transfer process of fish or fish products at sea or in port, from one fishing vessel to either another fishing vessel — or to a vessel used solely for the carriage of cargo, for further transport.” It is already an area of concern in fisheries management, as without proper monitoring, poor transshipment practices can lead to Illegal, Unreported and Unregulated (IUU) fishing. This further complicates the collection of data and accurate traceability systems.

With reduced operational controls, perceived potential risks include transshipment of illegal catch, for example of prohibited species, illegal substance and human trafficking, overfishing quotas or catch limits where relevant, reduced data collection, falsification of shipment and traceability documentation.

Whilst there are no immediate solutions to this issue, we ask for greater transparency within the industry that these practices are occurring. Where Electronic Monitoring is already available onboard vessels, we ask that this be used to help with oversight in lieu of human observers. Further to this we urge RFMOs to immediately implement minimum best practice standards for Electronic Monitoring as soon as practicable and ask that e-observer data to be accepted where possible to confirm good practices are being maintained.

We would also like to direct industry to the [ISSF website](#), which further discusses three ways fisheries and fishery managers can embrace electronic monitoring at this troubling time and looking forward into the future. The three highlighted methods include:

- Acceleration of technologies towards best practice where possible, improving data collection from the vessels at sea;
- Putting more resources into Vessel Monitoring Systems (VMS) to monitor the implementation of conservation management measures, combat IUU fishing, and provide data for scientific analyses or research programmes; and
- Recognition of the gaps in data which will occur following the reduction in human observer presence in tuna fishing operations globally and the development of strategies to combat the deficits. This could include governments investing in electronic reporting and monitoring technologies, which could continue to run alongside human observers when it is safe for them to return to the work.

As a FIP coordinator for several tuna fisheries in the Atlantic, Indian and Pacific Oceans, we encourage the FIPs with which we work to implement any and all methods possible to ensure continued compliance to regional Conservation Management Measures (CMMs).

Key Traceability can be contacted directly for further information about any of the FIPs we are currently working with. Please email Kat Collinson at k.collinson@keytraceability.com for further information.