

A Review of Management and Reporting Trends Related to Transshipment Occurring within the WCPFC

The Western and Central Pacific Fisheries Commission (WCPFC) recognizes that transshipment at sea is a common practice. However, when insufficiently regulated and reported, it contributes to inaccurate catch records and IUU fishing in the Convention Area. As indicated through the WCPFC Secretariat Annual Report on Transshipping, the number of reported high seas transshipment events has increased by 97 percent between 2014 (552 events) and 2017 (1,089 events). The number of transshipping vessels has also increased; in 2018, 55 percent of fishing vessels on the WCPFC Record of Fishing Vessels (RFV) were authorized to transship on the high seas, a significant increase from the 40.5 percent seen just three years ago in 2015. A robust analysis of transshipment data, however, is difficult because information regarding transshipment is diffuse, spread out between multiple reports, and tends to be inconsistent between reporting sources.

This paper provides a brief outline and analysis of the publicly available information on transshipment operations within the WCPFC and is meant to stimulate thought and discussions regarding how transshipment is managed and reported in the WCPFC. The data and trends clearly illustrate the need for additional management rules on transshipment in the WCPFC Convention Area to ensure full and effective control and monitoring of these activities and to reduce the opportunities for illegal fishing and the introduction of illegal caught fish into the seafood supply chain. Several specific recommendations are included at the end of the paper.

Key Issues

1. The Size of Carrier Fleets and Number of High Seas Transshipment Events is Increasing
2. There is Insufficient Sharing of Data Regarding WCPFC, IATTC, and NPFC Transshipment Operations
3. Carrier Observer Reports Are Not Being Submitted to the WCPFC Secretariat
4. Discrepancies Exist in the Number of Transshipments Reported by Offloading and Receiving Vessels
5. Additional Sources of Information Are Needed to Effectively Verify Reported Transshipment Operations

1. The Size of Carrier Fleets and Number of High Seas Transshipment Events is Increasing

By August 2018, Panama’s active authorized carrier vessel fleet on the RFV grew to 114 vessels, followed by Korea (33 vessels), Liberia (25 vessels) and Chinese Taipei (20 vessels). Between 2014 and 2017 the number of Panamanian flagged carriers reported to have “Fished” in the Convention Area increased by 56 percent (55 vessels to 86 vessels). Between 2016 and 2017, Chinese Taipei flagged vessels increased the number of their reported high seas transshipment events by 82 percent for offloading vessels (290 to 529 events) and by 80 percent for receiving vessels (113 to 204 events)¹. During that same period, Korean flagged carriers also increased receiving vessel reporting of transshipments by 112 percent (94 to 200 events)¹.

Table 1 below summarizes the number of carrier vessels reported by each CCM to have “Fished” in the Convention Area in 2017 and the number of carriers that reported high seas transshipping events as per the 2018 WCPFC TCC Annual Report on Transshipment (RP03)¹. The difference between the number of carriers that operated in the Convention Area in 2017 (139 carriers) as opposed to the number of carriers that reported high seas transshipping events (27) should be noted. There is very little transparency or reporting on the regional level of the operation of the remaining 112 carriers, which represent over 80 percent of the entire carrier fleet, that were reported to have “Fished” in the Convention Area in 2017 by their flag State CCM but did not report high seas transshipment events. *In order to provide a full accounting of all the activities of carriers that operate in the Convention Area, carrier vessels should be required to provide all transshipment reports and declarations to the Secretariat regardless of where the transshipping event occurs (high seas, EEZ, or in port).*

Table 1: Vessels reporting “Fished” and vessels reporting high seas transshipping events in 2017

Flag State	Active Carriers on the RFV (as of 8/24/18) ²	Carriers that were reported to have “Fished” in the WCPFC Convention Area in 2017 ²	Carriers that reported high-seas transshipment events in 2017 ¹
Korea	33	29	6
Liberia	25	4	4
Panama	114	86	9
Chinese Taipei	20	6	3
Vanuatu	4	5	3
China	13	9	2

2. There is Insufficient Sharing of Data Regarding WCPFC, IATTC, and NPFC Transshipment Operations

In August 2018, MRAG Americas, the IATTC carrier observer service provider, reported to IATTC:

“...MRAG does not currently have an agreement with the WCPFC to collect data on transshipments in the Western Pacific. The dividing line is the 150 W line, despite the fact that the WCPFC area overlaps the IATTC, particularly around Tahiti. If the transshipment occurs at-sea east of 150W an observer is required. If the carrier vessel takes transshipments west of 150W, these will be designated WCPFC transshipments. The observer is to observe these transshipments at carrier vessel captain’s discretion...” (Section 5, page 13)³

Due to the lack of an agreement between the WCPFC and the IATTC carrier observer service provider on transshipment observation, nearly 11% of transshipments that were reported to have occurred in the WCPFC Convention Area on carriers carrying an IATTC observer were not observed in 2017, despite the presence of an IATTC observer. The sole reason for this appears to be because a vessel captain is allowed to have the discretion whether an event is observed or not. These unobserved events, totaling 50 separate events with an average weight of transshipment of 56.03 metric tons, potentially represents over 2,800 metric tons of WCPFC product that went unreported by weight and species in 2017³. *To ensure that all transshipping events occurring in the WCPFC Convention Area be observed, documented, and reported directly to the WCPFC Secretariat, and to prevent the delegation of decision-making on transshipment monitoring to vessel masters in the future, the current data-sharing agreement between WCPFC and IATTC should be extended to cover MRAG Americas, the IATTC carrier observer service provider.*

Additionally, it appears there is no specific mention of the 413 events WCPFC transshipment events that were observed by IATTC observers in 2017 included within the 2018 WCPFC TCC Annual Report on Transshipment (RP03). As such, it is unknown if the WCPFC Secretariat has received information from IATTC on these events and whether this information was included in the Annual Report. *If these transshipments have not been included, the Secretariat should be tasked with updating RP03 to include this information, including a clear delineation of the additional number and flag of offloading and receiving vessels involved in transshipping in the WCPFC Convention Area and the amount of product transhipped.*

Preliminary historical analysis conducted by the Pew Charitable Trusts of carrier vessels whose movements can be tracked through IMO-mandated use of AIS indicates at least 24 WCPFC-authorized carriers, primarily flagged to Panama and Chinese Taipei, operate on the high seas in the northwest quadrant of the WCPFC Convention Area in calendar year 2016, an area that overlaps with the Convention Area of the North Pacific Fisheries Commission (NPFC). We would expect this trend to have continued in 2017. However, WCPFC Secretariat Annual Reports on Transshipping over the last four years has indicated that no high seas transshipping events are reported to have occurred in this part of the WCPFC Convention Area. While it is possible these carriers are exclusively transshipping NPFC-managed fish, it is also possible that WCPFC-managed fish are being transshipped (such as longline caught North Pacific albacore, yellowfin, bigeye tuna and swordfish). *The lack of reporting requirements for carrier vessels to document their intention to transship either WCPFC-managed species or NPFC-managed species upon entering the overlapping WCPFC/NPFC Convention Areas, the lack of transshipping reporting and observer protocols within NPFC, coupled with no formal data-sharing agreement between the WCPFC and NPFC Secretariats, limits the ability for both regional management authorities to clearly understand the activities of carrier vessels operating in this part of the WCPFC Convention Area and to what extent these vessels might be transshipping mixed quantities of WCPFC and NPFC managed species. TCC should recommend the implementation of carrier vessel notification protocols to provide greater clarity to regional authorities as to the intention of carrier vessels for transshipping WCPFC or NPFC managed species.*

3. Carrier Observer Reports Are Not Being Submitted to the Secretariat

The 2018 WCPFC TCC Annual Report on Transshipment (RP03)¹ does not include any information about reports received by the Secretariat from observers, despite the fact that CMMs have indicated full observer coverage of all 1,089 reported transshipment events*. In 2017, the Secretariat reported at TCC13 (paragraph 203 of the TCC14 Meeting Summary Report)⁴ that they had received only one observer report for the 956 high seas transshipping events that were reported to have occurred in the Convention Area in 2016. *To allow for independent verification of transshipment related data received from carrier vessel transshipment declarations, TCC14 should recommend that the Commission revise the WCPFC Regional*

* "...The majority of CCMs who were involved in high seas transshipment in 2017 seemed to affirm that high seas transshipment conducted in 2017 were 100% covered by observers..."

Observer Programme (ROP) Standards and Guidelines document to mandate that observers document all transshipment events occurring on the high seas in the WCPFC Convention Area and submit these observer reports directly to the Secretariat.

4. Discrepancies Existing in the Number of Transfers Reported by Offloading and Receiving Vessels

The 2018 WCPFC TCC Annual Report on Transshipment (RP03)¹ reveals discrepancies in notifications and declarations received from offloading and receiving vessels. For instance, the report indicates that Panamanian carriers were involved in 280 high seas transshipment events in 2017, yet only 210 notifications and 202 declarations were received from the carriers¹. Small inconsistencies occur with three other flag States. These inconsistencies are also found in the information provided by CCMs on transshipment within their Annual Report Part I submissions⁵. For example, Panama's 2018 Annual Report Part I indicated only 15 high seas transshipment events occurred in 2017 (as compared to the 280 high seas events reported in RP03). Liberia reported 243 events in their Annual Report Part I (without a breakdown of where the events occurred – high seas, EEZ, or outside the Convention Area - although they reported the events occurred in all these locations). Korea reported 168 high seas events (as opposed to 200 high seas events in RP03). Vanuatu reported 270 high-seas transshipping events without a breakdown of how many involved offloading or receiving vessels. China reported one carrier to have conducted high seas transshipment (as opposed to two carrier vessels in RP03). Chinese Taipei provided no information in their Annual Report Part I regarding transshipping events involving their carrier vessels.

Table 2: 2017 high-seas transshipment events reported to the Secretariat by flag vessels as of 3 Sept 2018¹

may not include CCMs updates provided as part of dCMR

	Count of vessels in reports received		Count of reported transshipment events			
	As receiving vessels	As offloading vessels	Receiving vessel	Offloading vessel	advance notifications received CMM 09-06 35 a iii)	declarations received CMM 09-06 35 a iv)
China	2	134	29	273	29 273	29 273
Japan		13		21	21	21
Republic of Korea	6	62	200	90	199 90	200 90
Liberia	4		248		245	243
Panama	9		280		210	202
Chinese Taipei	3	178	204	529	204 514	204 524
Vanuatu	3	63	127	169	121 165	127 166
Receiving vessels	27		1089		1008	1005
Offloading vessels		449		1089	1063	1074

Table 3 summarizes data outlined within CCMs Annual Report Part I, the number of carrier vessels that conducted transshipments in 2017 as well as the location where these transshipment events took place (high seas, EEZ, in port). Four out of these six flag States did not provide the number of carrier vessels that conducted transshipment in 2017. In addition, four of the six did not specify the location of their transshipment events. One did not provide any information at all about carrier vessels and only reported on “offloading” vessels.

Table 3: 2017 carrier vessel data submitted by flag States in their Annual Report Part I.

Flag State	Carriers That Conducted Transshipments	Transshipments in Port	Transshipments in EEZs	Transshipments on High Seas	Transshipments outside WCPFC
Korea	Number Not Provided	154	0	168	34
Liberia	4	243 events reported w/no breakdown of locations			
Panama	Number Not Provided	228	0	15	0
Chinese Taipei	Number Not Provided	Not Provided	Not Provided	Not Provided	Not Provided
Vanuatu	Number Not Provided	199 events reported “received” w/no breakdown of location			Not Provided
China	1	No details reported on events or locations provided			Not provided

Without infringing upon the national laws of any coastal State, the Commission should mandate consistent transshipment reporting requirements for all transshipping events within the Convention Area, regardless

of where the event occurs, including those that take place in port and within EEZs. This would allow the Secretariat to have a clear overall picture of all transshipping events occurring within WCPFC waters during a specific calendar year.

5. Additional Sources of Information Are Needed to Effectively Verify Reported Transshipment Operations

According to the 2018 WCPFC TCC Annual Report on Transshipment (RP03)¹, the Secretariat undertook an analysis of VMS data to attempt to detect potential transshipment events, specifying that an incident would be counted as an event when “...the reported WCPFC VMS positions related to two fishing vessels, are estimated to be within a distance of 250 meters, over a time period of at least 4 hours...”. Despite only 23% of the over 1600 transshipment events that were reported to the Secretariat during that period being detected, the Secretariat should be applauded for this initiative. In order to improve the accuracy of the tool, the Secretariat should consider data from the ICCAT and IOTC carrier observer programmes, which indicate that the vast majority of transshipment events at sea in those regions are completed in less than three hours. Observer report analysis and stakeholder input are key resources the Secretariat can utilize to improve the effectiveness of the WCPFC Transshipment Analysis Tool and increase the overall detection rate. Another valuable tool is the use and analysis of Automated Identification System (AIS) data. Given that the VMS polling rate for longliners is once every four hours, AIS could be used to gain a better understanding of the length of time a transshipment at sea takes place within the WCPFC Convention Area that VMS cannot do due to the length of time between polling. *TCC14 should recommend that the Secretariat consider modifying its detection criteria and be allowed to conduct a demonstration on the usefulness of AIS as a supplement to VMS and other reporting data over the next year, especially as it relates to transshipment reporting.*

In order to standardize the data submitted by CCMs on transshipment operations, the Secretariat has created the template in Annex 3 of RP03¹ for use by all applicable CCMs when submitting their Annual Report Part I. *TCC14 should approve this template with the addition of data fields that clearly outline the number of offloading and receiving vessels involved in transshipping in the Convention Area as well as the number of events for each by location (high seas, EEZ, in port).*

Considerations:

This analysis clearly demonstrates the need for management reform of transshipment in the WCPFC Convention Area. The Pew Charitable Trusts has developed best practices related to transshipment management aimed towards maximizing transparency and minimizing the potential for IUU fish to be laundered into the market. Oversight of transshipment can be improved in WCPFC by implementing these best practices in three main areas:

- **Reporting** - The current WCPFC transshipment measure (CMM 2009-06) should be strengthened to include consistent transshipment reporting requirements to all areas within the Convention Area, including all transshipments that occur in port and within EEZs. This will allow the Secretariat to receive a complete picture of transshipment activity that occurs within the WCPFC Convention area.
- **Monitoring** –The template provided by the Secretariat in Annex 3 of RP03 should be expanded to include additional data fields on number of offloading and receiving vessels involved in transshipping and locations of where transshipping events occurred (high seas, EEZs, in port). This will allow cross-verification of vessel transshipment reporting. In addition, the ROP Standards and Guidelines document should be revised to mandate the submission of observer reports to the Secretariat for all high seas transshipments occurring within the WCPFC Convention Area to facilitate the ability for the Secretariat to review, cross-verify and validate transshipment information.
- **Data sharing** – The Commission should establish formal transshipping data-sharing procedures with the North Pacific Fisheries Commission and expand the current data-sharing agreement with IATTC to include the ability for the IATTC carrier observer service provider (MRAG Americas) to share information directly with WCPFC for any transshipment taking place on the high seas in the WCPFC Convention Area involving a carrier vessel with an embarked IATTC observer.

References:

1. Annual Report on WCPFC Transshipment Reporting with an Emphasis on High Seas Activities (WCPFC-TCC14-2018-RP03)
<https://www.wcpfc.int/node/31649>
2. WCPFC Record of Fishing Vessels History as of 24 August 2018
<https://www.wcpfc.int/doc/historical-record-fishing-vessels-rfv-data>

3. Review of the IATTC Regional Observer Programme - Covering the period January 1, 2017 to February 15, 2018 (IATTC Document CAF-06-03 Addendum 1)
<https://www.iattc.org/Meetings/Meetings2018/IATTC-93/IATTC-AIDCP-Annual-Meetings-AUG2018ENG.htm>
4. Summary Report of the Thirteenth Regular Session of the Technical and Compliance Committee (WCPFC14-2017-TCC13)
<https://www.wcpfc.int/meetings/tcc13>
5. Annual reports Part 1 for each CCM available on the WCPFC website for the 14th Regular session of the Scientific Committee
<https://www.wcpfc.int/meetings/14th-regular-session-scientific-committee>