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LDAC, MEDAC, CCRUP and CCSUR JOINT ADVICE FOR ICCAT (2025)

The LDAC, MEDAC, CCRUP and CCSUR (Advisory Councils with interest in ICCAT management, henceforth “we”) express strong support in the fight against IUU fishing and encourages the European Union to work on the adoption of further transparency and anti-IUU measures, which should include:

Fight against Illegal, Unregulated and Unreported (IUU) fishing

- Liaising with other ICCAT Contracting and *Cooperating Non-Contracting Parties (CPC)* to speed, as much as possible, the ratification of the new ICCAT Convention¹, adopted by the Commission in 2018 but not yet ratified by a majority of CPCs.
- Further expanding International Maritime Organization (IMO) number reporting requirements to include all eligible vessels, in line with [IMO Resolution A.1117\(30\)](#).
- Increasing transparency about vessels’ identities, including beneficial ownership. Specifically, propose the expansion of the fleet register to include beneficial ownership information, as it is requested in other regional fisheries management organisations (RFMOs), particularly within [Recommendation 21-14](#) amending [Recommendation 13-13](#) Concerning the Establishment of an ICCAT Record of Vessels 20 Metres in Length Overall or Greater Authorized to Operate in the Convention Area.
- Continuing to demand greater accountability from certain flag states at the ICCAT Compliance Committee (COC). This refers to those flag states, that are contracting parties, and repeatedly fail on their obligations to report about investigations taken in relation to allegations of non-compliance and on actions taken to address compliance concerns², as specified in under [Recommendation 08-09 to establish a process for the review and reporting of compliance information](#) – a recommendation which should be upheld.
- In this context, we recommend the EU examines and acts based on any new suitably documented compliance information reported under [Recs 08-09](#) and [19-09](#).

¹ ICCAT Resolution 18-06 on sharks: <https://www.iccat.int/Documents/Recs/compendiopdf-e/2018-06-e.pdf>

² Consistently with Part VI (“Compliance and enforcement”) of the Agreement on the implementation of the provisions of the United Nations Convention on the Law of the Sea of 10 December 1982 relating to the conservation and management of straddling fish stocks and highly migratory fish stocks.



- To this effect, we ask the EU to ensure full implementation of the compliance provisions under Recommendation 2024-01 including through dedicated capacity building efforts for least developed CPCs, or, for example, through dedicated meetings or other initiatives.

Furthermore, we also recommend the introduction of a severity grade categorisation into the ICCAT compliance review process to help prioritise discussions and highlight potential issues according to their seriousness and/or urgency.

- Establishing a regional Vessel Monitoring System (VMS) for all vessels actively fishing in ICCAT area by [building upon Recommendation 18-10](#) by ICCAT concerning minimum standards for vessel monitoring systems in the ICCAT convention area.
- Revising [Recommendation 23-17 on port State measures to prevent, deter and eliminate IUU fishing](#), to better align it with the [FAO Port State Measures Agreement](#) and facilitate better information exchange through the development of an ICCAT-managed electronic information exchange system, interoperable with the [Global Information Exchange System \(GIES\)](#), that includes information on denials of port access and inspection results, at a minimum. We also recommend that the EU works further on ICCAT's *Compliance Committee* to ensure the effective implementation of the existing Recommendations.
- Supporting the establishment of a High Seas Boarding and Inspection (HSBI) scheme in ICCAT should enable all ICCAT CPCs to work together and equitably on vessel inspections and to ensure that members comply with ICCAT's conservation and management measures.

Furthermore, we recommend for HSBI discussions to be the most inclusive possible, including on capacity building for inspectors and developing coastal CPCs. Therefore, we welcome the Canadian proposal on the Integrated Monitoring Measures (IMM) body taking a more active role on the developing of an ICCAT HSBI scheme. It is also essential that the EU looks for more support, specifically within low-income CPCs, for this scheme to be established.

Fishing capacity

- We are concerned by the lack of accurate and up to date information on active vessels fishing in the ICCAT Convention Area. We consider that the Standing Committee on Research and Statistics (SCRS) should progress with the estimation of fishing capacity levels in the ICCAT Convention Area, to be used to estimate the optimum levels of fishing capacity that would be required to achieve ICCAT's objectives.



Transshipments

- It is widely acknowledged that transshipment at sea increases the risk of IUU-caught fish entering the supply chain, undermining sustainable fisheries and ocean conservation³. They can also facilitate human rights abuses by allowing signs of forced labour and human trafficking—such as abuse and coercion—to go undetected offshore, and by preventing exploited crew from escaping or seeking help⁴. The EU maintains a stringent policy on transshipments, including a ban in Union waters, and EU Member States do not allow transshipments at sea even beyond their waters⁵.
- We, support the total elimination of transshipments at sea and call on the EU to take decisive action toward this goal in ICCAT, including, in the interim tabling and/or supporting any proposal that enhances oversight and transparency of transshipment activities, including strict compliance with the already existing ban for transshipment of shortfin mako sharks (*Isurus oxyrinchus*).
- In the meanwhile, we support the continuation of the ICCAT Regional Observer Program for fishing vessels 24 meters Length Overall (LOA) engaging in transshipment operations at sea. We consider that port States must ensure that in-port transshipment operations – including and in particular at anchorage⁶ – are appropriately monitored and controlled, in line with Recommendation 23-17 amending recommendation 18-09 on port state measures to prevent, deter and eliminate illegal, unreported and unregulated fishing or more stringent measures, in accordance with local and international law. In accordance with Recommendation 23-17, “each year CPCs shall inspect at least 5% of landing and transshipment operations in their designated ports (...)”.

Regional Observer Scheme (ROS)

- We strongly support the increase of scientific observation coverage for all fleets, recalling the minimum coverage recommended by the SCRS for Endangered, Threatened and Protected (ETP) species. We also note that ICCAT already requires observer coverage at 100% for purse seiners, 20% for bluefin tuna (*Thunnus Thynnus*) and 10% for tropical tuna vessels for longliners.
- However, these requirements are found in the multi-annual conservation and management plans for tropical tunas ([Rec. 24-01](#)) and bluefin tuna (Rec. 24-05), we note that [Recommendation 16-14 on minimum observation standards](#) was due for

³ FAO. (2020). Transshipment: A closer look – A review of practices in selected countries. FAO Fisheries and Aquaculture Technical Paper No. 653.

⁴ Environmental Justice Foundation. (2023). The weakest link: How transshipment at sea threatens human rights, labour and environmental standards.

⁵ ICCAT. (2024). COC-301, Annual reports of CPCs.

⁶ In accordance with paragraph 1 of Recommendation 18-09 “Port” includes offshore terminals and marine areas of the port, and other installations for landing, transshipping, packaging, processing, refueling, or resupplying.



revision in 2019, but it has nevertheless remained unchanged and outdated. So, we therefore suggest the EU to propose an update and alignment of the provisions of [Rec. 16-14](#) with those in the multi-annual plans and to include the adopted Electronic Monitoring Standards ([Rec. 23-18](#)). Exclusion could be considered for small-scale fisheries (art. 15 of the resolution) provided that alternatives for at port observation and discard ban are in place. In addition, we support increasing observer coverage including through electronic monitoring systems, since the Recommendation of minimum observation standards, has been adopted.

- Encourage other CPCs to use the adopted electronic monitoring (EM) standards while continuing the development of further standards for all relevant fleets to assist in the collection of data. This should include the adoption of a set of technical EM definitions to enhance consistency and coherence across the tuna RFMOs. The EM standards should be complemented with appropriate audit and assurance processes to ensure that EM programmes are collecting and sharing accurate information in a standardised way.
- We consider that the timeframe proposed for the implementation of a Regional Observer Scheme at the ICCAT is not realistic. While we fully support the development and equitable harmonisation of national observer programmes and, when missing or proved inefficient, the development of ROS for all fishing vessels covered by [Recommendation 16-14](#), we also think, that the plan presented in EU's proposal of a Multi-annual Plan for Tropical Tunas is also not realistic and needs further analysis by the Working Group on Integrated Monitoring Measures (IMM) and SCRS. This is essential for the effective monitoring of all ICCAT fisheries, as well as to ensure the accuracy of the data transmitted to the ICCAT secretariat. We recommend that the SCR provides proper estimates of bycatch to implement a sufficient level of observer coverages.

Management strategy evaluation

- We support the development of management strategy evaluation (MSE)⁷ processes within ICCAT and grasp this opportunity to advocate for increased exchange between scientists, policy makers, fishing industry and stakeholders. As shown by the recent example of the development of the Bluefin tuna management procedure (MP) in ICCAT with, inter alia, a series of ambassadors' meetings, we consider it could be a model to be followed for tropical tuna stocks also.
- Along with support for developing an MP for all tropical tunas, including the adoption of an MP for western Atlantic skipjack at this year's Commission meeting, we also advocate for a multi-annual and multi-stocks approach for target stocks, in particular tropical tunas (*Thunnus albacares*, *Thunnus obesus* e *Katsuwonus pelamis*), Southern

⁷ CCRUP, LDAC, MEDAC, & SWWAC. (2025, March 14). Letter on management strategy evaluation (MSE) processes at ICCAT.



& Mediterranean swordfish (*Xiphias Gladius*) and blue sharks (*Prionace glauca*) that will bring long-term stability to the management framework for the sustainability of resources and the socio-economic needs of tuna dependent economies.

- We also urge the EU to request SCRS to complete an MSE development for Northern and Southern blue sharks starting by the end of 2025 with the objective to develop MPs for adoption by 2027 and Southern Albacore by 2026.

Data collection

- We recall the need to establish and strengthen data collection of tuna and tuna-like species for all fleets, including recreational ones, and artisanal fisheries across the ICCAT Convention Area, in order to estimate mortality produced by this sector to improve robustness of stock assessment and associated management advice. This also applies for the reporting of dead discards and live releases of ETP species and other non-retained species. Especially for sharks, the continued non reporting of discards hinder stock assessments and the implementation of required CMMs.
- We remind that ICCAT has approved “Rules and procedures for the protection, access to, and dissemination of data compiled by ICCAT,” modified in 2022. We note that in the case of the on-going Poseidon project, these rules have not been respected and data not in the public domain has been transmitted without the necessary approval of CPCs. We therefore urge the EU to remind the ICCAT Secretariat that ICCAT’s Confidentiality Rules and Procedures should be respected at all times.

ICCAT and GFCM Cooperation

- We strongly encourage concerned RFMOs and CPCs to take decisive actions to effectively eliminate the use of illegal driftnets and comply with all relevant conservation and management measures (CMMs)⁸.
- In line with the previous point, we strongly recommend that the EU continues advocating for the establishment of a clear and comprehensive definition of what constitutes a driftnet, as per the 1989 UN Resolution which entered into force in 1992, in order to prevent loopholes that enable circumvention of the current ban. These efforts should culminate in a proposal for a recommendation in the next ICCAT Commission meeting to establish a total prohibition on the possession and use of driftnets for all ICCAT species, in line with the EU’s discussion paper presented at the Permanent Working Group for the Improvement of ICCAT Statistics and Conservation Measures (PWG) in 2024⁹.

⁸ Incl., ICCAT Recommendation 03-04 relating to Mediterranean swordfish, GFCM Recommendation GFCM/22/1997/1 on the limitation of the use of driftnets in the Mediterranean and GFCM Recommendation GFCM/29/2005/3 prohibiting the use of driftnets for fisheries of large pelagic species

⁹ ICCAT. (2024). Discussion paper on driftnets (PWG_420/2024).



- We urge the EU to ensure that the long-overdue joint workshop between ICCAT and the GFCM on the implementation of driftnet-related resolutions is held without further delay, still in 2025, before the ICCAT Commission meeting.¹⁰ Such an initiative is essential to strengthen cooperation and enforcement efforts. We also encourage the EU to support and promote similar joint actions that foster regional coordination in addressing the issue.
- GFCM stressed the urgency of addressing the issue of illegal driftnets, in close coordination with ICCAT, and referred to the advice formulated by the CoC on the need to notably craft a clear definition of such driftnets. Based on a proposal by the European Union, the Commission adopted Resolution GFCM/46/2023/10 on the restriction and prohibition of the use of driftnets in the Mediterranean Sea, as reproduced in Appendix 37. This resolution supports CPCs in understanding, through a joint GFCM and ICCAT effort, notably how to define the technical characteristics of driftnet fisheries to evaluate their impacts, harmonize management and ensure illegal driftnets are not used.
- This cooperation between GFCM and ICCAT should bolster oversight, strengthen implementation of the resolutions and actively contributing to more accurate reporting of relevant data, and improve control and monitoring. It should also allow the EU to draw lessons from GFCM's recent progress in the adoption of Management Procedures.

Labour Standards

- We recommend that any adopted recommendation or resolution on minimum labour standards on board fishing vessels for all CPCs shall provide for equal or higher standards than ILO 188. We also recommend that EU promotes the ratification of ILO 188 and the IMO 2012 Cape Town Agreement by ICCAT CPCs.

Climate Change

- As climate change impacts all fish stocks and the commercial viability of fisheries in all oceans as well as the livelihoods of people depending on fishing and fish for income and subsistence, the 4 ACs urge the Commission to advocate for setting of clear priorities such as advancing the work on an Ecosystem Approach to Fisheries Management (EAFM) and including climate considerations in MSEs and management procedures.

¹⁰ GFCM. (2023). Resolution GFCM/46/2023/10: Terms of reference and report of the annual meeting.



- While the SCRS should lead the process and formulate the questions, there is also a clear need for input from decision makers to inform and speed up this process at ICCAT. We therefore consider the maintenance of an independent climate change experts' group consisting of scientists and managers to guide and help prioritise these efforts within ICCAT and recommend the EU implement the revised ICCAT action plan on climate change adopted in 2024.

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Ruben Farias
Chair of CCRUP

A handwritten signature in blue ink that reads 'Sergio López'.

Sergio López
Chair of CCS

A handwritten signature in blue ink that reads 'Iván López'.

Iván López
Chair of LDAC

A handwritten signature in blue ink that reads 'Antonio Marzoa Notlevsen'.

Antonio Marzoa Notlevsen
Chair of MEDAC