



PREPARED BY THE GLOBAL TUNA  
ALLIANCE TO SUPPORT TUNA  
2020 TRACEABILITY DECLARATION  
SIGNATORIES

# Tuna 2020 Traceability Declaration Government Partnership Toolkit

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July 2020

# About The Global Tuna Alliance

**The Global Tuna Alliance** is an independent group of retailers and tuna supply chain companies, who are committed to realising harvest strategies for tuna fisheries, avoidance of illegal, unreported and unregulated (IUU) products, improved traceability as well as environmental sustainability, and progressing work on human rights in tuna fisheries and to implementing the objectives laid out in **World Economic Forum's** Tuna 2020 Traceability Declaration as championed by **Friends of Ocean Action**.

They work collaboratively with member and non-member organizations to find industry-wide solutions to efficiently implement actions to address Alliance and Tuna 2020 Traceability Declaration commitments on:

- Tuna Traceability
- Socially Responsible Tuna Supply Chains
- Environmentally Responsible Tuna Sources
- Government Partnership

In the summer of 2019 Stichting **Global Tuna Alliance** was incorporated as a foundation under the laws of the Netherlands.

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# Purpose of toolkit



The aim of these toolkits is to provide support to Tuna 2020 Traceability Declaration (TTD) signatories in meeting their commitments.

Each toolkit explains what each commitment seeks, the purpose of the commitment and how progress in achieving the commitment can be demonstrated. Where available, examples from companies that have met the commitment are presented.

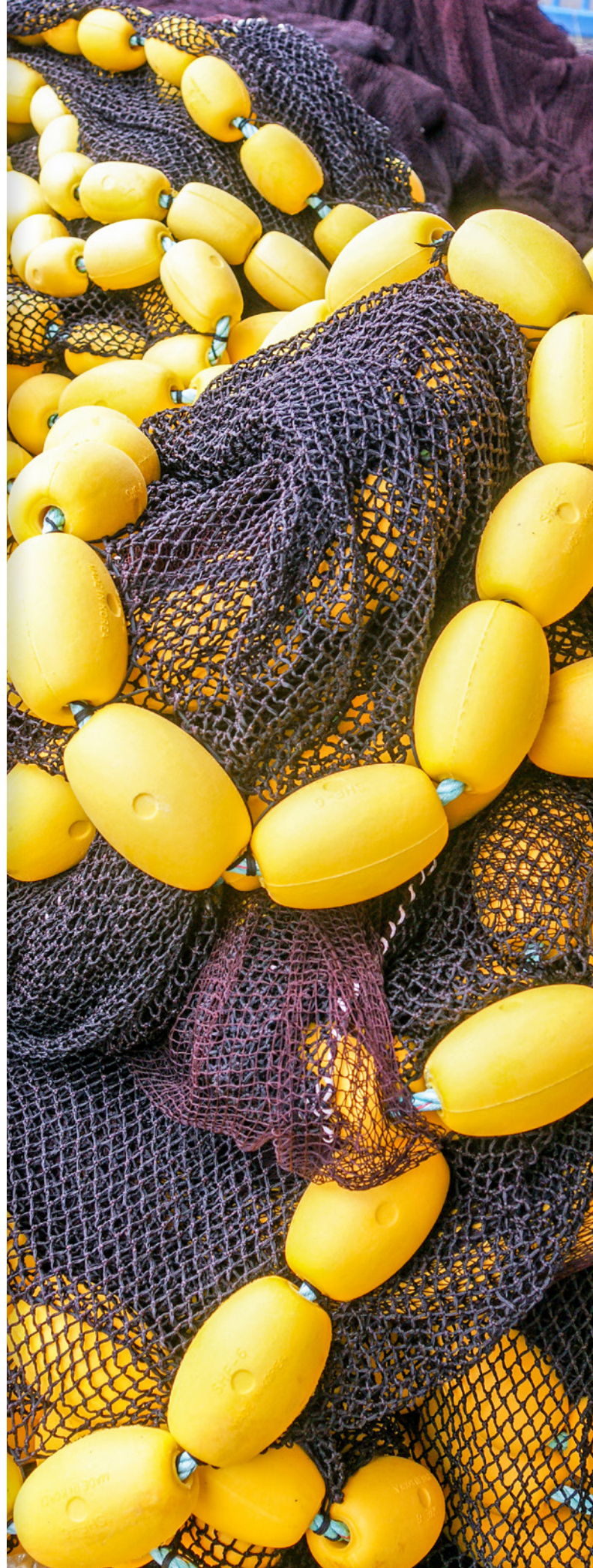
# The Tuna 2020 Traceability Declaration

The Tuna 2020 Traceability Declaration is a non-legally binding declaration that grew out of a dialogue among governments, companies and civil society, spurred by The Ocean Conference in June 2017 at the United Nations Headquarters that will focus on implementation of Sustainable Development Goal 14 (SDG 14).

Sixty-six companies, including retailers and other tuna supply chain businesses, signed the Declaration with the aim of stopping illegal tuna getting to market, and promoting improvements to environmental sustainability and human rights in tuna fisheries. The declaration was supported by six national governments and 21 civil society organizations.

The Commitments of the Forum's Tuna 2020 Traceability Declaration are based on the following four pillars:

- Tuna Traceability Commitment
- Commitment to a Socially Responsible Tuna Supply Chain
- Commitment to Environmentally Responsible Tuna Sources
- Government Partnership



# The government partnership commitment

The government partnership commitment supports the success of the three other commitments and calls on industry leaders to engage with governments to drive them to take action on the following areas:

- a) Implement [harvest strategies](#) for all tuna stocks under the jurisdiction of each tuna RFMO by 2020, that will ensure sustainably managed tuna fisheries in line with SDG Target 14.4.
- b) Establish systems to identify and restrict illegal seafood through government-led measures on traceability and transparency.
- c) Build capacity to establish and manage information systems to account for domestic and international fishing fleets, landings, enforcement and trade of seafood products, in line with the FAO Code of Conduct and the [Port State Measures Agreement](#).

Tuna are highly migratory, pelagic species, with more than 70 countries reporting landings. Conservation and management of tuna fisheries are handled through five intergovernmental tuna Regional Fisheries Management Organizations (tRFMOs). Participating states include coastal/port States - including Small Island Developing States (SIDS) - and flag States with distant-water fleets.

We believe the tuna supply chain should be legal, sustainable and transparent, so that the benefits of tunas remain available to all. This includes effective international, RFMO and government regulation and monitoring of fishing efforts and catches.

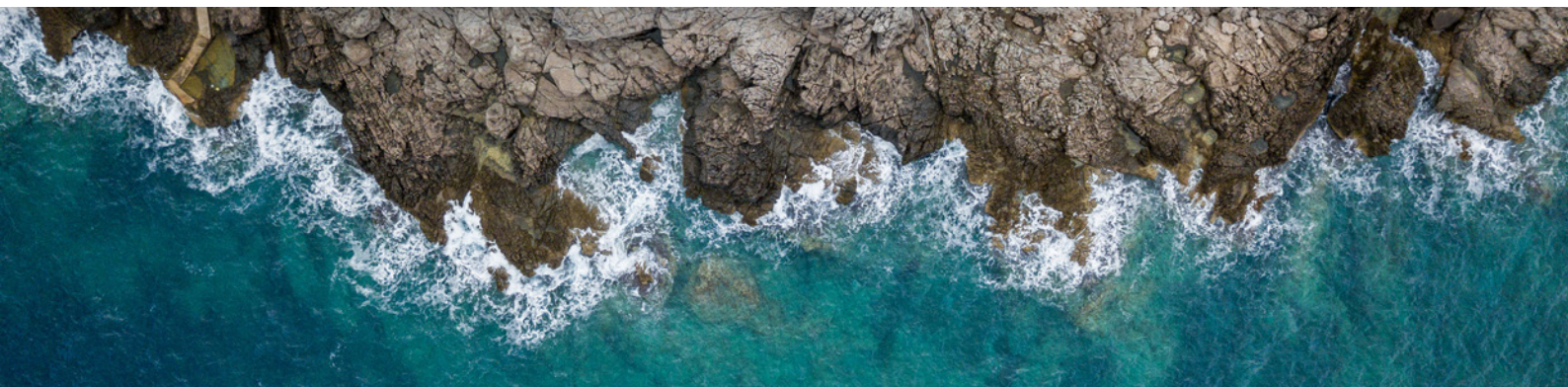
There are many challenges facing the development of sustainable tuna fisheries

including gear conflicts, overfishing, catch of sensitive non-target species, inadequate management, poor enforcement, etc. We believe addressing the management gap must be the priority, as effective management not only ensures the continued productivity of the target resources but also the accomplishment of other elements of fisheries sustainability.

We also believe that improving traceability and transparency will significantly improve existing sustainability initiatives and shows the greatest promise for scalability into mainstream commercial activities. Effective traceability (tracking tuna products from vessel to the final buyer) underpins sustainability efforts as it creates transparency and accountability within the supply chain, thereby enabling markets to directly support, and benefit from, improved fisheries performance.

Transparency (making information ultimately available to authorities and, when relevant, the public, including vessel fishing permissions, location of fishing activities, and catch and effort data) allows improved management of fisheries and encourages improved fisheries performance. Improved transparency also increases the likelihood that human rights abuses will be identified and stopped. Further technological developments will make traceability and transparency easier and more cost effective.

Most of the systems needed to implement traceability and transparency can be implemented independently by seafood companies to support and complement existing multilateral agreements and RFMO management requirements and, therefore, should enhance existing international efforts. As the risks of sourcing from regions with little oversight are increasingly clear, it is important for companies to advocate for vessel monitoring and transparency. FishWise's report "[Open Water: Guidance on Vessel Transparency for Seafood Companies](#)" identifies various steps that seafood companies can take with vessel owners and supply chain practices, and through engagement with governments and RFMOs.





## Performance of Tuna 2020 Traceability Declaration Signatories

An online survey was developed by The Global Tuna Alliance and circulated to Declaration signatories to find out how they have been addressing the Declaration's four commitments. The results have been used to generate a [progress report](#) which highlights examples of best practice, where commitments have been met, and the methods or systems used to develop plans for improvement.

Performance on government partnership scored the lowest by each supply chain sector. Advocacy for developing harvest strategies and harvest control rules is the only area where companies had engaged in any significant way. Very limited activity had taken place on points (b) and (c). The advocacy efforts reported by respondents are often facilitated by representative organisations such as [The Global Tuna Alliance](#) (GTA) and the [International Seafood Sustainability Foundation](#) (ISSF). Company activities planned in 2020 to achieve the government partnership commitment tend to be built around these multistakeholder initiatives which reflects the support requested by signatories.

Across the supply chain, respondents cited a lack of personnel as the key obstacle in meeting the government partnership commitment. 'Other' also scored highly and when explored further, this revealed a lack of leverage a single company has to engage with governments. Many companies have government relations staff or are members of organisations who work on

government interaction that could be avenues for representation with decision-makers such as *Europêche*, Food Marketing Institute (FMI) or European Fish Processors Association (AIPCE).

When asked what support is required to achieve the government partnership commitment, responses converged around two related themes: industry collaboration and capacity building:

- Industry collaboration focusses on the understanding that individual companies will struggle to secure policy changes operating independently and need to collaborate to leverage their power and impact. GTA, which is committed to supporting TTD signatories, was referred to by several respondents as an example of how companies can address this challenge.
- Capacity building, the second theme, related to both educating signatory companies themselves on the issues and how to engage with governments, as well as educating decision-makers and other stakeholders on why the requirements are being made. This is intrinsically linked to industry collaboration and forms a key pillar of any engagement strategy.

The survey responses suggest that progress can be made towards meeting the partnership commitment if signatories actively participate in advocacy efforts coordinated by representative organisations such as the GTA and ISSF, and supported by the Global NGO Tuna Forum. Future activities by companies should be built around these multistakeholder initiatives which aligns with the support requested by signatories.

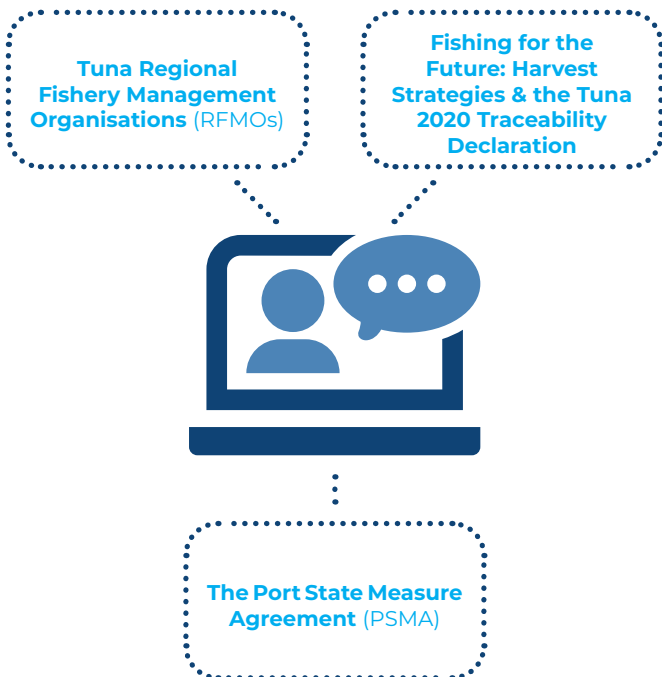
# How the government partnership commitment can be met

The government partnership commitment can be met by advocating for the adoption of international agreements and management measures. Effective advocacy can take place through direct country engagement and

through supply chain improvement. In particular, we believe the government partnership commitment can be addressed through supporting multistakeholder advocacy efforts for:

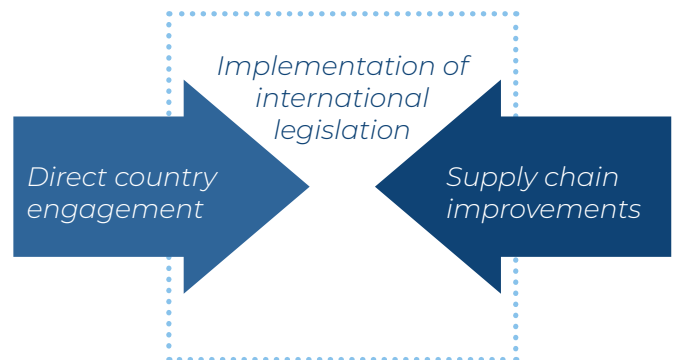
1.	The development of harvest strategies and harvest control rules	which will also progress the environmental sustainability commitment
2.	Ratification and effective implementation of the Food and Agriculture Organization (FAO) Agreement on Port State Measures (PSMA)	which will also progress the traceability commitment
3.	The development and broad use of the FAO Global Record of Fishing Vessels, Refrigerated Transport Vessels and Supply Vessels (Global Record)	
4.	Ratification and implementation of The International Labour Organisation (ILO) Working in Fishing Convention (C188)	which will also progress the social responsibility commitment
5.	Ratification and implementation of the International Maritime Organisation (IMO) <a href="#">Cape Town Agreement of 2012</a>	

To further support companies, the GTA has organised a series of educational webinars on each commitment. For the government partnership commitment, the following webinars have been hosted.



In order to facilitate the effective implementation of international instruments (such as the PSMA etc.), the supply chain can engage through two primary means: direct country engagement or supply chain improvements (Figure 1).

Figure 1: International legislation engagement methods





**Direct country engagement** consists of encouraging countries to ratify and implement the legislation, through advocacy letters, meetings, or other means. Encouraging supply chain improvements consists of lowering barriers which may prevent ratification by countries, for example improving in-country conditions or practices such as ensuring vessel operators are aware of information required by countries to properly apply international agreements and tools, and are prepared to share that information in an accurate, comprehensive and timely manner to meet international legislation even before the treaty itself is ratified. Supply chain improvements also means understanding and evaluating supply chain risks, such as sourcing seafood through ports that are not implementing controls. Directing sourcing from lower-risk countries may provide an incentive for countries to meet their obligations and support promotion of the PSMA. International agreements are most impactful when they have been ratified and implemented by a greater number of countries, especially those with a higher risk or greater sourcing importance. Unfortunately, in the case of some international agreements – such as the Cape Town Agreement – fewer than twenty countries have ratified.

However, no one organization can achieve tuna fishery sustainability on its own; we must work collaboratively. As a first step, we recommend that companies incorporate a commitment in their policies to exert their influence to support initiatives to strengthen RFMO management of tuna fisheries, both through policy makers and their supply chain. To deliver this, we recommend that companies consider membership and/or participating in the advocacy efforts of representative organisations such as The Global Tuna Alliance (GTA) or the International Seafood Sustainability Foundation (ISSF). These pre-competitive collaborative initiatives that engage industry include dedicated advocacy programmes within their portfolio (Box 1). The GTA is focussed on retail, food service, processors and suppliers, while the ISSF participating companies are tuna processors, traders and marketers that commit to conform to science-based conservation

measures adopted by the International Seafood Sustainability Foundation aimed at improving the long-term health of global tuna fisheries. All ISSF participating companies work with the Foundation to advocate for improved fishery management, fund scientific research, and take direct action to encourage the adoption of responsible fishing practices.

Collaborative advocacy through organisations like the GTA and ISSF offers the support of a dedicated work programme that can supply necessary resources, such as detail on the asks, including rationale and links to other commitments. They also provide the platform to join in collaborative engagement and advocacy efforts with other companies and organisations, allowing your voice to be amplified. Specific engagement opportunities can be established, supported or facilitated (like side-events at RFMO meetings, meetings with Government officials etc.) to further press for action.

Building on collaborative advocacy, there are also specific, individual business actions you can take to engage with Governments (*Figure 2*). Such engagement allows you to discuss any commercial impacts, and any sourcing consequences, of inaction.

*Figure 2: Government partnership engagement approach*



Supply chain improvements consists of lowering barriers which may prevent ratification by countries, for example improving in-country conditions or practices to meet international legislation even before a treaty itself is ratified.



# Box 1.

## Global Tuna Alliance (GTA) And International Seafood Sustainability Foundation (ISSF) Government Outreach Partnership Activities

There are many challenges facing the development of sustainable tuna fisheries. We at GTA believe addressing the management gap and traceability must be the priorities, as effective management not only ensures the continued productivity of the target resources but also the accomplishment of other elements of fisheries sustainability. Effective traceability underpins sustainability efforts as it creates transparency and accountability within the supply chain, thereby enabling markets to directly support improved fisheries performance.

The GTA's government partnership work programme includes:

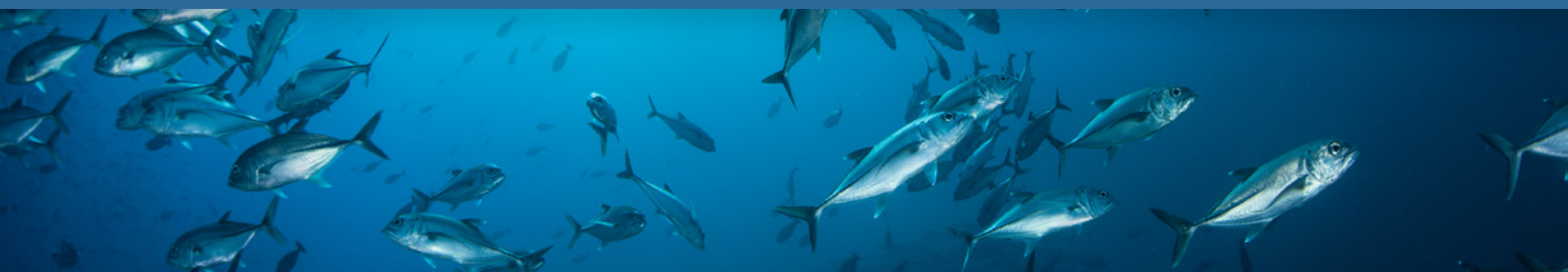
- Working with governments to ensure the implementation of effective harvest strategies to achieve sustainable tuna stocks under the jurisdiction of each tuna RFMO by 2020
- Working with governments to establish systems to identify and restrict illegal seafood, and build capacity to establish and manage information systems to account for domestic and international fishing fleets, landings, enforcement and trade of seafood products, by:
  - Encouraging company's own policy or government engagement departments to engage with and support advocacy efforts for the development of harvest strategies and harvest control rules, ratification and implementation of PSMA, ratification and implementation of ILO working in fishing convention and the development of global record of fishing vessels
- Engage suppliers to participate in advocacy efforts.

ISSF advocates for science-based approaches, policies and conservation measures to advance tuna stock sustainability. ISSF activates market and policy influence to advance global tuna stock and tuna ecosystem sustainability, both through the efforts of the foundation and its participating companies

and by encouraging stakeholders to do the same, including ngos, retailers, vessel owners, traders and organizations that represent them.

ISSF advocates to RFMOs and their member nations – both through direct outreach and the efforts of ISSF participants and stakeholders – for policies and approaches that foster real, positive change. ISSF's global priorities include:

- Implementation of rigorous harvest strategies, including harvest control rules and reference points
- Effective management of fleet capacity, including developing mechanisms that support developing coastal state engagement in the fishery
- Science-based fad management & non-entangling fad designs
- Increased member compliance with all adopted measures adopted, and greater transparency of processes reviewing member compliance with measures
- Strengthened monitoring, control and surveillance (MCS) measures and increased observer coverage, including through modern technologies such as electronic monitoring and e-reporting
- Adoption of best-practice by catch mitigation and shark conservation and management measures



# Harvest strategies & harvest control rules

RFMO participants are, to varying degrees, flexible and open to influence through advocacy. We believe there is real scope for the tuna supply chain to play a greater role in communicating with the RFMO decision-makers<sup>1</sup> and member states, in order to ensure that the shared ambition for well-managed, sustainable tuna fisheries, is clearly articulated.

At present, fisheries management decisions are based predominantly on the potentially competing short-term financial objectives, putting the long-term sustainability of many tuna fisheries at increased risk. The Tuna 2020 Traceability Declaration specifically calls for harvest strategies, which include pre-agreed frameworks for making fisheries management decisions (including changing limits to catch or effort), to move beyond the current political gridlock too often seen in the tuna RFMOs.

The Global NGO Tuna Forum, a collection of NGOs with interests in tuna, who in May 2017, agreed to press all four tuna RFMOs to adopt comprehensive and precautionary harvest strategies, as defined by core elements<sup>2</sup> (Box 2), and to implement them within 3-5 years. It is noted that while there has been progress made at the RFMO level to put precautionary harvest strategies in place, there is substantial variance in individual performance by the RFMOs. Additionally:

- Implementation has either yet to be started or has not occurred fully
- The adoption and implementation of harvest strategies is not moving fast enough
- There are concerns about backsliding

The assessments of most tuna fisheries to the MSC Fisheries Standard have identified the need for improvements to, or adoption of, well-defined harvest strategies and HCRs. In early 2019, the HCR conditions for all MSC certified tuna fisheries were aligned, so that multiple certified fisheries in the same region can work to the same timeframes and can coordinate their efforts for the adoption of robust harvest strategies supported by well-defined HCRs. However, should the deadlines be missed, the MSC certifications will be at risk of suspension.

## Box 2.

### Precautionary Harvest Strategies core elements:

- Performance indicators (PIs)
- Precautionary target & limit reference points (TRP & LRP)
- Management objectives
- Acceptable levels of risk
- Monitoring strategies
- Harvest control rule (HCR)
- Management strategy evaluation (MSE)



<sup>1</sup> The Commission is the main decision-making body in an RFMO. The Commission is composed of different delegations: the decision makers are the Members and the influencers are the Cooperating Non-Contracting Parties (CNCs) (major) and Observers (minor).

<sup>2</sup> For more information on harvest strategies see The Pew Charitable Trusts factsheet "Harvest Strategies: 21st Century Fisheries Management", and short animations on "Fishing for the Future: The Case for Harvest Strategies" and "Demystifying MSE: Management Strategy Evaluation"

# Supply Chain Actions

Accordingly, to meet this element of the government partnership commitment, signatories should advocate at the international and national level to drive national policy with respect to RFMOs and through that, RFMO activity to develop and implement comprehensive & robust harvest strategies based on sound science that include all of the elements included in Box 2. This can be supplemented with individual business actions.

Join or participate in the advocacy efforts of representative organisations (for example the GTA or ISSF) who include Harvest Strategies & Harvest Control Rules as an organisational priority. *As noted in above, pre-competitive collaborative tuna initiatives that engage industry include dedicated advocacy programmes on implementing Harvest Strategies & Harvest Control Rules at RFMOs, providing necessary support and resources.*

Participate in informal collaborative outreach and engagement in support of harvest strategy development at RFMOs. *Joining collaborative engagement and advocacy efforts with other companies and organisations will allow your voice to be amplified and better heard by RFMOs and member governments.*

Develop a corporate RFMO policy for example “We are committed to exerting our influence to support initiatives to strengthen RFMO management of tuna fisheries, including through harvest strategies, both through policy makers and our supply chain.” Consider adding a time-bound commitment where you review sourcing. *Sets out explicitly, and publicly, what you are expecting of RFMOs to deliver tuna fisheries sustainability – which will compliment your wider sustainable seafood commitment. It also notes the consequences on no action. Will alert your suppliers to your priorities.*

Write to the RFMO delegations of relevance (i.e. from the country you are headquartered in, countries you currently/wish to source to/ from, and countries to which tuna fishing or supply/tender vessels in your supply chain are flagged) and call for the development and implementation of harvest strategies. *Informs the delegations that you have influence over of your expectations, as a commercially important stakeholder, of them at RFMO meetings. Allows you to discuss commercial impacts of tuna fisheries not having harvest strategies in place, and any sourcing consequences.*

Contact RFMO delegates (or their staff) and present your ‘asks’ in person (where feasible) *A face-to-face meeting or phone call amplifies the importance you are putting on RFMOs acting on harvest strategies and sets out your expectations of the delegate.*

Ask your suppliers to verifiably engage with RFMO delegates. *Cascade your requirements to suppliers and ask them to cascade to their suppliers (the producers) to further amplify the messages but also to highlight the commercial importance of securing harvest strategies. This may be particularly relevant for fisheries that require harvest strategies for FIP improvement needs and certified fisheries outstanding conditions.*

Attend RFMO Meetings. *By viewing the RFMO in action, either on a government delegation or as an observer, you can see which delegates are supportive of measures and which are blocking, as well as better understand the process and how to best advance your priorities at the RFMO.*

As noted in *Figure 1*, there are two primary international legislation engagement methods.

The graphic below (*Figure 3*) explains how the actions described above fit into this structure.

*Figure 3: RFMO engagement actions by primary engagement methods*

- Participate in collaborative outreach and engagement
- Write to the delegations of relevance
- Present asks ‘in-person’
- Attend RFMO Meetings

## *Direct country engagement*

## *Supply chain improvements*

- Join representative organisations
- Develop a corporate RFMO policy
- Ask your suppliers to verifiably engage with RFMOs

# The Port State Measures Agreement (PSMA)

Seafood, both wild and farmed, is among the most valuable food commodities in the world, accounting for \$143 billion in global trade each year, according to the Food and Agriculture Organization of the United Nations.

Yet up to \$23.5 billion worth of seafood destined for world markets is stolen from the seas each year through illegal, unreported, and unregulated (IUU) fishing. Strong port controls, regulations governing fishing vessels' access to ports and inspections upon landing or transshipping fish, are needed to curb this illicit activity.

[The Port State Measures Agreement \(PSMA\)](#) is a cost-effective tool to combat IUU fishing that takes advantage of the natural bottleneck created by ports and ensures that illegally caught fish cannot make its way to market. As more nations implement Port State Measures, IUU fishing will no longer be a low-risk, high-reward enterprise.

The seafood industry can provide assurance that it is not inadvertently contributing to illegal fishing by supporting the adoption and effective implementation of the Agreement. And by conducting due diligence, retailers and seafood industry buyers can ensure that the fish they sell is legally sourced and influence other sectors of the seafood industry, including processors and wholesalers. The Pew Charitable Trusts have produced an informative [factsheet](#) on why and how seafood buyers should help.

# Supply Chain Actions

Accordingly, to meet this element of the government partnership commitment, signatories should advocate for the PSMA, by calling on governments to do their part by ratifying and implementing the Agreement, as well as adopting and enforcing compliance with RFMO Port State Measures (PSMs) in line with the PSMA. This would ensure that illegally-caught fish cannot enter the market, thus reducing the burden on actors across the supply chain to conduct due diligence and reduce their risk of trading in IUU seafood, and would limit the number of ports where illegal catch can be offloaded and landed. These efforts should be supplemented with actions by supply chain actors.

- Show a preference for ports in States that are party to the PSMA, or have implemented effective PSMs<sup>3</sup> aligned with PSMA requirements, as these ports are associated with a lower level of risk of being entry points for illegal catch.
  - Conduct greater due diligence for ports where product is being landed to establish the level of PSM implementation and associated risk of IUU catch entering the market, with particular attention to ports that have been found to be associated with a higher risk of IUU catch entering the market. Risk assessment criteria should include whether the port State has procedures to identify suspicious vessels and block them from its ports, standards for port inspections and the capacity to carry them out, and channels to share information with other regional and international agencies. An easy way for the supply chain to assess risk is to obtain and analyse inspection reports on the vessels they source from.
  - Consider working with suppliers to improve the effective implementation of Port State Measures by:
    - Mapping supply chains to understand the ports of landing and transshipment, to determine whether catch is landed or transshipped at ports of countries that have ratified and implemented the PSMA.
    - Checking whether ports in the supply chain are in States that have signed the PSMA and, if not, advocating for those States to join (*Template letter text aimed at national governments is included in the annex*).
- Checking whether those port States have officially designated ports in the supply chain for landing and transshipment by foreign-flagged vessels and, if not, advocating for their inclusion in the list of designated ports.
  - Inquiring about the implementation of Port State Measures during port visits and using a standardized list of questions (Annex 1: Pew's ports questionnaire [Port State Measures Agreement: What Questions Should Seafood Buyers Ask Authorities and Suppliers?](#)). By asking these questions, the supply chain would also demonstrate to governments that seafood buyers support effective implementation of port controls to reduce IUU risks in seafood supply chains.
  - Ensuring seafood sourcing policies are in place that mandate the avoidance of illegal, unreported and unregulated fishing. *Your seafood sourcing requirements can be enhanced by including a time-bound commitment requiring any seafood products to have been landed or transhipped at ports of countries that have ratified and effectively implemented the PSMA or have implemented effective PSMs aligned with PSMA requirements.*
- Participate in collaborative outreach and engagement. Joining collaborative engagement and advocacy efforts with other companies and organisations allowing your voice to be amplified. In calling on governments to act, fishers engaged in IUU activities will have nowhere to land or sell their catch. Supply chain members should ask State authorities to:
    - Ratify and implement the PSMA – especially if their supply chain includes ports in States that have not yet joined the treaty, supply chain actors can play an active role in advocating for those countries to do so, and to adopt practices consistent with PSMA standards in ports where catches are routinely transited for company supply chains.
    - Ensure that their designated ports and contact points are registered on the PSMA Applications for Designated Ports and Contact Points<sup>4</sup>.
    - Ensure that information about all internationally-operating vessels under their flag (including the IMO number,

<sup>3</sup> At the present time, no "one tool" exists to help buyers determine or know if ports have implemented effective PSMs. PAS:1550 or Pew's ports questionnaire (Annex) can assist, however. <sup>4</sup> <http://www.fao.org/port-state-measures/operational-resources/en/>

registration information, ownership data, authorization information, and any changes in flags, names, owners and operators for flagged vessels involved in fishing operations) has been uploaded to the [Global Record](#)<sup>5</sup>

The FAO have stressed the importance of States submitting basic contact point, designated port and vessel-related data to the FAO information platforms. This data is described as the "indispensable backbone" of the future PSMA Global Information Exchange System.

- o Take an active role in the effective implementation of the PSMA by participating in meetings, working groups, particularly those of the Parties to the PSMA, and other international and regional forums, including those that deal with developing States' requirements.
- o Ensure that PSMs are adopted by all RFMOs to meet the international minimum standards of the PSMA<sup>6</sup>, and if they do not, propose reforms to those RFMO PSMs. *The PSMA establishes the international minimum standards for port State measures. To ensure that IUU fishing is being addressed uniformly around the world and to avoid port shopping around the world, RFMOs are encouraged to adopt PSMs that meet the PSMA standards. Current RFMO alignment with PSMA control measures is uneven.*
- o Ensure exchange of operational data on fishing activities – including data from automatic satellite location devices, transshipment reports, and catch data – between flag and port States in a timely and responsive manner, to enable efficient risk assessment, inspection and timely processing of vessels scheduled to enter port<sup>7</sup> and/or offload product. *The level of information exchange required currently falls short of PSMA standards. For example, information exchange is not present in 50% of RFMO PSMs, and only 33% of RFMO PSMs mandate electronic information exchange.*
- Join representative organisations (for example the GTA) who include ratification and implementation of the PSMA as an organisational priority. *Pre-competitive industry-led tuna initiatives can provide necessary support and resources for collaborative outreach and engagement.*

<sup>5</sup> To ensure the information provided by States is publicly available on a global platform rather than held by different entities and to differing standards.

<sup>6</sup> To provide industry with greater certainty that governance gaps contributing to IUU fishing and trade have been closed across their supply chain. <sup>7</sup> Understanding whether States exchange data in this manner will assist in the verification of "effective implementation" by countries in their role as both port and/or flag States.

As noted in *Figure 1*, there are two primary engagement methods for supply chain actors to support the effective implementation of international legislation.

The graphic to the right (*Figure 4*) explains how the actions described above fit into this structure.



*Figure 4: PSMA engagement actions by primary engagement methods*

Participate in collaborative outreach and engagement that encourages governments to:

- Ratify and implement the PSMA
- Ensure that their designated ports and contact points are registered on the PSMA Applications for Designated Ports and Contact Points.
- Ensure that information about all internationally-operating vessels under their flag has been uploaded to the Global Record
- Take an active role in the implementation of the PSMA
- Ensure that relevant PSMs are adopted by all Regional Fisheries Management Organisations (RFMOs)
- Ensure exchange of operational data on fishing activities between flag and port States in a timely and responsive manner

#### *Direct country engagement*

#### *Supply chain improvements*

- Join representative organisations
- Show a preference for ports in States that are party to the PSMA, or have implemented effective PSMs aligned with PSMA requirements
- Conduct greater due diligence for ports where product is being landed to establish the level of PSM implementation and associated risk of IUU catch entering the market
- Consider working with suppliers to improve the implementation of Port State Measures by:
  - Mapping supply chains
  - Checking whether ports are in States that have signed the PSMA and, if not, advocating for those States to join
  - Checking whether States have officially designated ports for landing and transshipment by foreign-flagged vessels
  - Inquiring about the implementation of Port State Measures during port visits
  - Revise your seafood sourcing requirements to include PSM



## The Global Record of Fishing Vessels, Refrigerated Transport Vessels, and Supply Vessels (Global Record)

Monitoring and enforcing the activities of vessels fishing in international waters is difficult, particularly due to the lack of mandatory Unique Vessel Identifiers (UVIs). A UVI is an assigned number that stays with a vessel until it is scrapped, regardless of any change of ownership or flag state.

The International Maritime Organisation (IMO) number is the only UVI in operation on the scale needed for fishing vessels. IMO numbers are mandatory for “propelled, sea-going vessels” over 100 gross tons, but originally excluded vessels “used exclusively for fishing”. In 2013 the IMO Assembly agreed to issue IMO numbers to large fishing vessels (over 100 gross tons), and they have issued them to over 23,000 fishing vessels on a voluntary basis (Resolution A.1078 (28) (FAO 2018). In 2017, the IMO Assembly agreed to a second amendment to the IMO number scheme covering smaller, non-steel hull vessels operating internationally<sup>8</sup>. The Pew Charitable Trusts has produced a factsheet<sup>9</sup> explaining the IMO number and what information is required to obtain an IMO number, which is free of cost.

The IMO has also granted IMO numbers to fishing vessels smaller than 12m if they go outside of their EEZs, provided they have a steel hull and satisfy the other structural requirements.

Without mandatory UVIs it is very difficult to identify or take action against IUU vessels because fishing vessel owners can implement complex vessel naming, registration, and incorporation strategies to avoid detection. This includes constant flag hopping between flag States with lax enforcement, poor monitoring capacity and/or low safety and

labour regulations. For supply chain actors, it is important to recognize, and distinguish, which vessels sail under these flag States to direct attention and focus on vessels that are less detectable (e.g. these flags are used by merchant and supply vessels offering shipboard logistics such as fuel and provision, that includes transshipment of cargo).

The transparency needed to identify and sanction vessels for IUU fishing and human rights abuses at sea will remain unattainable without UVIs for all fishing vessels, and IMO numbers for internationally-operating vessels. The FAO ‘Global Record of Fishing Vessels, Refrigerated Transport Vessels and Supply Vessels’ is being developed to share the UVIs of commercial fishing vessels along with information on their ownership, flag, history, characteristics, and fishing authorizations. The Global Record is intended to be a tool for improving global transparency and traceability in the fisheries sector, and will work synergistically with the PSMA and help improve flag State performance, as laid out in the FAO’s Voluntary Guidelines.

Although submission of information to the Global Record database is voluntary, FAO member States, through the FAO Committee on Fisheries (COFI), have endorsed the Global Record as one of the main global tools to fight IUU fishing. The Parties to the PSMA have also highlighted to link the Global Record to the PSMA, stating that the role of the Global Record, which is voluntary, as one of the most important tools for the effective implementation of the PSMA, facilitating the cross-check of information and risk analysis on vessels during decision-making on whether to allow a foreign vessel into port, or whether to inspect a foreign vessel<sup>10</sup>.

<sup>8</sup> Specifically, “all motorized inboard fishing vessels of less than 100 gross tonnage down to a size limit of 12 metres in length overall (LOA) authorized to operate outside waters under the national jurisdiction of the flag State. <http://www.fao.org/global-record/news-events/detail/zh/c/1105929/>.

<sup>9</sup> <https://www.pewtrusts.org/en/research-and-analysis/fact-sheets/2017/05/the-imo-number-explained> <sup>10</sup> <http://www.fao.org/3/mz914en/mz914en.pdf>



# Supply chain actions

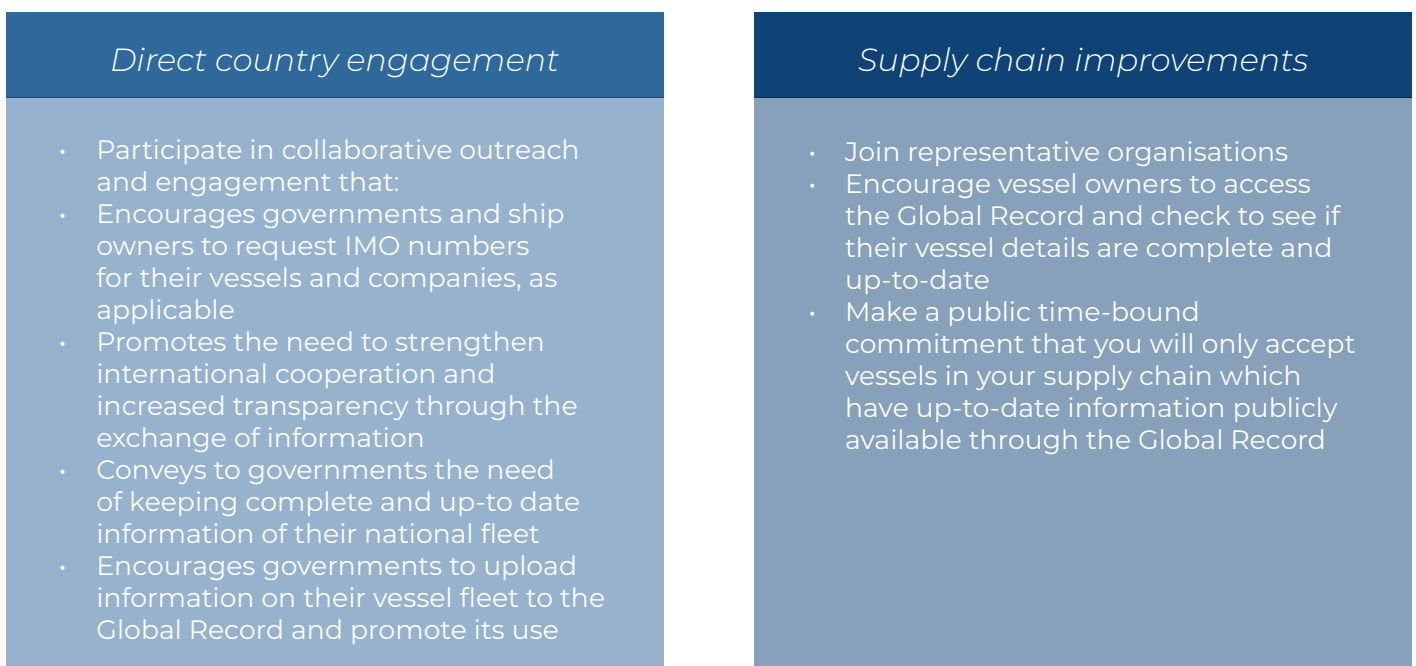
As the Global Record information system has been developed and is now [available](#) for public use, the priority ask is to support data submission and use. Therefore, to boost participation from States and promote its use, in line with the commitments attained at the Forum's Tuna 2020 Traceability Declaration, the following actions have been identified:

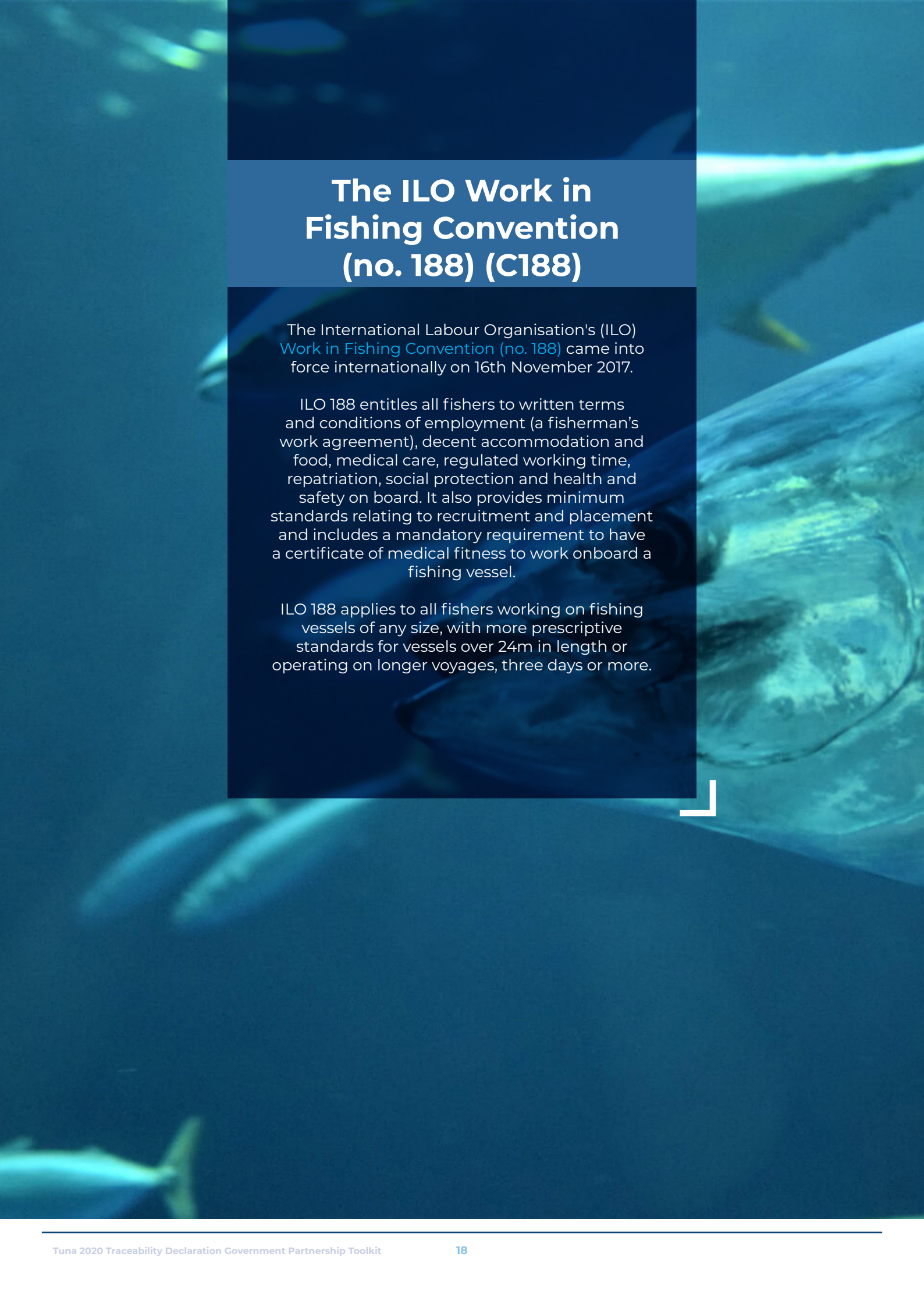
- Join representative organisations (for example the GTA) who include the advancement of the Global Record as an organisational priority.
  - Encourage governments and ship owners to request IMO numbers for their vessels, as applicable (e.g. IMO Res A.1117(30) or as per national regulation), especially for vessels within the Member's supply chain.
  - Promote the need to strengthen international cooperation and increased transparency through the sharing of vessel-related information between relevant States, FAO and regional organisations or arrangements.
  - Convey to governments the need to keep complete and up-to date information of their national fleet, in line with their flag State responsibilities, and to make this information accessible to supply chain actors in a timely manner.
- Encourage governments to upload information on their vessel fleet to the Global Record and promote its use for the verification of registration information (previous flags, owners, etc.) and avoidance of flag hopping, as well as for risk analysis by monitoring, control and surveillance (MCS) officers and for decisions on landing/importation of the product to the markets.
- Encourage vessel owners, wishing to increase transparency and traceability, to access the Global Record and check to see if their vessel details are complete and up-to-date, and, when necessary, contact the relevant national authorities to inform of discrepancies.
- Make a public time-bound commitment that you will only accept vessels in your supply chain which have up-to-date information publicly available through the Global Record.

Through collaborative engagement and advocacy efforts with other companies and organisations your voice, and your ability to influence positive action by port and flag States, will be amplified.

As noted in *Figure 1*, there are two primary international legislation engagement methods. The graphic below (*Figure 5*) explains how the actions described above fit into this structure.

Figure 4: PSMA engagement actions by primary engagement methods





## The ILO Work in Fishing Convention (no. 188) (C188)

The International Labour Organisation's (ILO) [Work in Fishing Convention \(no. 188\)](#) came into force internationally on 16th November 2017.

ILO 188 entitles all fishers to written terms and conditions of employment (a fisherman's work agreement), decent accommodation and food, medical care, regulated working time, repatriation, social protection and health and safety on board. It also provides minimum standards relating to recruitment and placement and includes a mandatory requirement to have a certificate of medical fitness to work onboard a fishing vessel.

ILO 188 applies to all fishers working on fishing vessels of any size, with more prescriptive standards for vessels over 24m in length or operating on longer voyages, three days or more.

# Supply chain actions

- Join representative organisations (for example the GTA) who include ratification and implementation of ILO 188 an organisational priority.
- Participate in collaborative outreach and engagement
- Request that supply chains implement standards that align with ILO 188
- Request that sourcing countries consider ratifying ILO 188

As noted in *Figure 1*, there are two primary international legislation engagement methods.

The graphic below (*Figure 6*) explains how the actions described above fit into this structure.

*Figure 6: ILO 188 Engagement Actions by Primary Engagement Methods*

- Participate in collaborative outreach and engagement
- Request that sourcing countries consider ratifying ILO 188

*Direct country engagement*

*Supply chain improvements*

- Join representative organisations
- Request that supply chains implement standards that align with ILO 188



# The Cape Town Agreement

The International Labour Organisation (ILO) estimated in 1999 that 24,000 people die every year in the fishing sector—more than 10 times the number on merchant ships. Yet fishing vessels and their crews are excluded from nearly all international maritime regulations, such as safety certifications or working condition inspections, meaning that exploitative and unsafe practices can go undetected.

The 2012 Cape Town Agreement (CTA), adopted by the International Maritime Organisation (IMO), outlines fishing vessel standards and includes other regulations designed to protect the safety of crews and fisheries observers and provide a level playing field for industry. The Agreement will enter into force once 22 States with a combined 3,600 eligible fishing vessels ratify or accede. Taking this step will bring fishing vessel operators into the same compliance as other maritime vessels and end practices that place crews at risk. Until the CTA<sup>12</sup> enters into force, there are no mandatory global safety regulations for fishing vessels. Those working across the supply chain can not only reduce the market through which illegal seafood is sold, but also protect people working within it by taking actions.<sup>13</sup>

<sup>12</sup> The Cape Town Agreement is further explained in this document: [https://www.pewtrusts.org/-/media/assets/2019/09/ctaexplained\\_brief.pdf](https://www.pewtrusts.org/-/media/assets/2019/09/ctaexplained_brief.pdf).

<sup>13</sup> A blueprint for protecting fishing crews and mitigating illegal catch is outlined here: <https://www.pewtrusts.org/en/research-and-analysis/fact-sheets/2018/01/casting-a-safety-net-on-the-seafood-industry>.

# Supply Chain Actions

- Join representative organisations who include ratification and implementation of the CTA an organisational priority.

- Participate in collaborative outreach and engagement, including to policy makers and other stakeholders, on how you can support flag States ratification and raise global safety standards for fishing vessels.

- Request that supply chains implement standards that align with the CTA standards, including requiring that fishing vessels have valid International Fishing Vessel Safety Certificate issued under the provisions of the Agreement, and safety, navigational and radio-communication equipment as required by the Agreement.

- Request that sourcing countries consider ratifying the CTA to ensure safety provisions are met for existing vessels, and that new vessels under construction meet the standards of the Agreement as a minimum.

As noted in *Figure 1*, there are two primary international legislation engagement methods.

The graphic below (*Figure 7*) explains how the actions described above fit into this structure.

*Figure 6: ILO 188 Engagement Actions by Primary Engagement Methods*

- Participate in collaborative outreach and engagement
- Request that sourcing countries consider ratifying the CTA

*Direct country engagement*

*Supply chain improvements*

- Join representative organisations  
Request that supply chains implement standards that align with the CTA
- Advocate that new vessels under construction meet the standards of the CTA as a minimum

# Annexes for Resources

## Key Questions for Seafood Supply Chain Stakeholders<sup>14</sup>

1. Is the port State a Party to the PSMA?
  - a. If not, what is preventing the port State from joining?
2. Are ports designated for use by foreign-flagged vessels to land or transship fish?
  - a. If so, are the designated ports publicized through the PSMA app?
  - b. If so, are the ports used by non-domestic vessels that you source from listed as designated ports?
3. Must vessels seek permission before entering port to land or transship fish?
  - a. Is there a standard form for this request?
  - b. Do vessels you source from seek permission before entering port (as required)?
4. Is there an IUU-related risk-based procedure for controls on vessels that request entry into port to land or transship fish?
  - a. Is the procedure documented?
  - b. Can industry stakeholders obtain copies of the procedure?
5. What percentage of vessels that land or transship fish are subject to documentary checks or physical inspections?
  - a. How are selections made for which vessels to check/inspect?
  - b. Have the vessels you source from been selected for documentary checks/inspections?
6. Are there standards for documentary checks or physical inspections on vessels landing or transshipping fish?
  - a. If so, are these standards documented?
  - b. Can industry stakeholders obtain copies of this information?
- c. Which of the following are covered by such checks or inspections?
  - Vessel identification, construction, and registration documentation
  - License and authorizations to fish or transship
  - Catch and bycatch documentation
  - Processing and transshipment reports
  - Vessel monitoring systems and/or automatic identification systems
  - Fishing gear
  - Fish species and quantities
  - Safety certificates
  - Crew documentation
7. Are records kept of port entry requests, denials, documentary checks, and/or inspections?
  - a. If so, are these records public?
  - b. Is there a protocol to notify foreign port authorities of such information?
  - c. Is an electronic information system used to collect, store and exchange this information?
  - d. Can industry stakeholders obtain copies of this information?
8. Have any instances of bribery or corruption been identified in the implementation of port controls in the past five years?
  - a. If so, how have these been handled?
  - b. Are these instances made public?
9. Are fisheries authorities involved in examining notifications/requests for entry into port, authorizing or denying access to port, and conducting documentary checks and physical inspections on vessels landing or transshipping fish?
  - a. If not, which other authorities have responsibility for these tasks, and do the fisheries authorities play a role?
10. Is information on port controls shared among relevant administrations, including maritime authorities, fisheries authorities, customs authorities, the navy or coast guard, and food safety agencies?

<sup>14</sup> From The Pew Charitable Trusts: <https://www.pewtrusts.org/en/research-and-analysis/fact-sheets/2020/02/port-state-measures-agreement-what-questions-should-seafood-buyers-ask-authorities-and-suppliers>

# Template Text for Writing to Governments of Countries you Source From

This letter is submitted on behalf of [insert company name] who recognise that the sustainability of wild capture fisheries is integral to businesses and livelihoods, as well as the health of the marine environment.

The Government of [insert country name] serves as an important influence in the global seafood industry as a significant trade hub and buyer of seafood. We write to encourage the [insert country name] Government to take direct action to close its ports to fish caught illegally and, in doing so, improve the sustainability of our seafood supply chains. It is estimated that annual economic losses in 2012 were US\$83billion as a result of illegal, unreported and unregulated fishing (IUU).

We believe that strong controls placed upon the global seafood trade at port, through risk assessments and checks being made on vessels when they unload or tranship at port, are critical if all of us are to be able to guarantee that we are not inadvertently contributing to illegal fishing. Any shortcomings in this regard will seriously undermine our efforts to reduce the market for illegally caught seafood.

The key legal instrument in the implementation of port controls is the 2009 Food and Agriculture Organization of the United Nations (FAO) Agreement on Port State Measures to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing, known in short as the Port State Measures Agreement or PSMA. The PSMA requires parties to exert greater port controls on foreign-flagged vessels and allows ports to refuse port entry to vessels known to have engaged in illegal fishing, or immediately inspect them and restrict their access to port services, including landing and transhipment of fish. Measures to the same effect, applied to domestic vessels, ensure robust and comprehensive port controls. As a result, catch linked to illegal fishing is kept out of the world's markets and the incentives for dishonest fishing operators to continue their illegal activities are greatly reduced.

The number of States implementing Port State Measures in line with the PSMA is growing because it is a cost-effective way of closing ports to illicit catch, especially when compared to at-sea enforcement, and assures seafood buyers and consumers that they are not dealing with illegally caught or traded seafood. In addition, becoming a party to the PSMA is a clear signal to the international community that your government is dedicated to fighting illegal fishing. With ocean health and food security high on the global agenda, this year is an opportune moment for [insert country name] to join other significant leading fishing and seafood trading nations in acceding to the Agreement.

# Resources

## ISSF Resources

[About Tuna Regional Fisheries Management Organizations \(RFMOs\)](#)

[ISSF Reports: Global Tuna Stock Status](#)

[ISSF Technical Report 2020-12: Status of the World Fisheries for Tuna \(March, 2020\)](#)

[ISSF Technical Report 2020-09: An Evaluation of the Sustainability of Global Tuna Stocks Relative to Marine Stewardship Council Criteria \(Principle 1 and Principle 3\)](#)

[ISSF RFMO Best Practice Snapshots](#)

[RFMO Best Practice Performance](#)

[RFMO Best Practices Snapshot — 2020: Authorised Vessel Lists](#)

[RFMO Best Practices Snapshot — 2020: IUU Vessel Listing](#)

[RFMO Best Practices Snapshot — 2020: Vessel Monitoring Systems](#)

[RFMO Best Practices Snapshot — 2020: FAD Management](#)

[RFMO Best Practices Snapshot — 2020: Treatment of Supply & Tender Vessels by RFMO](#)

[RFMO Best Practices Snapshot — 2020: Observer Requirements](#)

[RFMO Best Practices Snapshot — 2020: Transshipment Regulation](#)

[RFMO Best Practices Snapshot — 2020: Compliance Processes](#)

[Technical Reports on RFMO Comparative Best Practices](#)

[ISSF 2020-02: Combatting IUU Fishing: Continual Improvement and Best Practices for IUU Listing Measures in Tuna RFMOs](#)

[ISSF 2020-03: Transshipment: Strengthening Tuna RFMO Transshipment Regulations](#)

[ISSF 2020-04: Tuna RFMO Authorised Vessel Lists: A Comparative Analysis to Identify Best Practices](#)

[ISSF 2020-05: Survey of Human Observer Programs for Purse Seine Vessels and a Set of Best Practices](#)

[ISSF 2020-06: Tuna RFMO Compliance Assessment Processes: A Comparative Analysis to Identify Best Practices](#)

[ISSF 2020-07: Survey of the Treatment of Support/Supply/Tender Vessels in Tuna RFMOs](#)

[ISSF 2020-08: RFMO Vessel Monitoring Systems: A Comparative Analysis to Identify Best Practices](#)

## The Pew Charitable Trusts Resources

[The Port State Measures Agreement: From Intention to Implementation](#)

[How to End Illegal Fishing](#)

[Implementing the Port State Measures Agreement](#)

[Electronic Monitoring: A Key Tool for Global Fisheries](#)

[Transshipment Reform Needed to Ensure Legal, Verifiable Transfer of Catch](#)

[Netting Billions: A Global Valuation of Tuna](#)

[Transshipment in the Western and Central Pacific](#)

[Case Studies of Harvest Strategies in Global Fisheries](#)

[Harvest Control Reference Points](#)

[Harvest Strategies Management Objectives](#)

[Harvest Strategies: The next phase of fisheries management](#)

[Harvest Strategy Glossary](#)

[Management Strategy Evaluation for Fisheries: Informing the selection of harvest strategies](#)

[Harvest Control Rules: Shaping effective long-term fisheries management](#)



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