



# Transshipment Regulation

## What Are the Rules for At-Sea Transshipment in RFMOs?

The regional fisheries management organizations responsible for highly migratory species (“tuna RFMOs”) each have measures that either regulate or prohibit the transfer of tuna between vessels at sea, and many have provisions that extend to transfers in port, including what data must be collected and reported. Regulation of transshipment is a flag State duty prescribed in the 1995 UN Fish Stocks Agreement (Article 18).

## Benefits of Regulation

The transfer of tuna at sea, without effective monitoring and data collection, undermines tuna sustainability. Unregulated, or poorly regulated, transshipment compromises the accuracy of RFMO stock assessments, provides a loophole for IUU activities and fish to enter the supply chain, and disrupts traceability and supply chain integrity. When comprehensively regulated and monitored, transshipment management measures will support rigorous traceability and help to combat IUU fishing and to prevent IUU fish from entering the supply chain. In addition, lawful transshipment can allow fishing vessels to remain at sea longer, thereby increasing their efficiency, because they no longer have to travel to port to offload their catch.

## How Do They Work?

Transshipment measures share four common components:

1. General provisions for the gears & vessel sizes and species covered by the measure
2. Authorization procedures (e.g., how far in advance of a transshipment activity the flag State must give notice to the RFMO)
3. Reporting requirements
4. Observer and other MCS requirements, such as VMS, port State monitoring, transshipment declarations and, in some instances, catch documentation schemes

These regulations primarily apply to at-sea transshipment activity by large-scale longline vessels.

IOTC, ICCAT, IATTC and the WCPFC have prohibited transshipment at-sea by purse seine vessels (with some exceptions); these vessels must transship in port.

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For a comprehensive review of **Transshipment in Tuna RFMOs**, please refer to [ISSF Technical Report 2023-06](#).



# Assessment of Transshipment Regulation by RFMO

## Recommended Best Practices

The following table shows the level of progress in each tuna RFMO in implementing the recommended best practices.

### Color Coding Key

Element(s) are consistent with the suggested best practices.	Some element(s) are present, but amendments or a change in procedure is needed to be consistent with best practices.	Element (s) are missing or inconsistent with best practices.
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RFMO	Application				MCS, Data Reporting & Sharing							Authorization & Notifications		
	Includes all vessels operating outside their EEZ and/or in one or more EEZs	Covers all RFMO spp, and spp caught in association with regulated fisheries; all transfers of RFMO regulated spp. recorded on t'shipment declaration	Applies to all areas within RFMO competence	Receiving vessels must be flagged to CPCs or CNMs	100% observer coverage (human or EM) on both the fishing vessel & the carrier vessel + Binding measure on observer safety	Require VMS and AIS; data to RFMO in near real-time; manual reporting every 4 hours in case of malfunction; carriers notify RFMO of entry and exit	Require IMO # to be authorized to transship	Prohibit from acting as both fishing and receiving vessel on the same trip	Pre & post event data provision to: RFMO, flag States, intended port or landing States, coastal States, & annual summaries	Standardize all t'shipment declaration data and formats + Data Sharing among RFMOs <sup>1</sup>	Provide a public list of all vessels authorized to transship	Infractions reported to flag States and RFMO; if insufficient action taken vessel automatically included on Draft IUU Vessel list	Guidelines, incl. criteria, for authorizing transshipment by flag State, and a review process of authorizations	Advance notice of 48 hours provided for t'shipment
CCSBT	✗ Applies to tuna longline fishing vessels with freezing capacity	✔	✔ N/A CCSBT is not spatially defined. It applies throughout the range of the stock.	✔ (See Resolution on Establishing a Program for Transshipment by Large-Scale Fishing Vessels)	✔ 100% observer coverage on carriers only (See Resolution on Establishing a Program for Transshipment by Large-Scale Fishing Vessels)  No safety measure adopted	✔ AIS not required. Entry/exit N/A  VMS Manual reporting required; frequency varies with RFMO Area  (See Resolution on Establishing a Program for Transshipment by Large-Scale Fishing Vessels)	✔ (See Resolution on Establishing a Program for Transshipment by Large-Scale Fishing Vessels)	✗	✔ Pre event goes only to flag State  Post event to Sect, flag State, coastal State & landing State  Annual report public  (See Resolution on Establishing a Program for Transshipment by Large-Scale Fishing Vessels)	✔ Data sharing MOUs with IATTC, WCPFC and ICCAT.	✔ List of authorized carriers public  List of fishing vessels authorized to t/ship not public	✔ Infractions reported  Vessel to be included on draft IUU vessel list if it transships with vessel in CCSBT IUU vessel list or engages in fishing contrary to any other CCSBT CMMs	✗	✗ 24 hours advance notice
IATTC Related measures : C-18-07 C-19-02 C-22-03 <sup>2</sup>	✗	✔	✔ Covers only HS and EEZs	✔	✔ 100% observer coverage on carriers only  Safety measure adopted	✔ AIS not required and Not required to report entry/exit  VMS required	✗	✔ Pre event to flag State only  Post event to Sect, flag State relevant coastal State & landing State  Annual summary public	✔ No data sharing	✔	✔ Infractions reported  Some transshipment infractions do warrant automatic inclusion on the draft IUU list	✗	✗	
ICCAT Related measures : Rec.24-14 Rec. 24-15	✔	✔	✔	✔ ICCAT is not permitting new NCP-flagged carrier vessels from 18 November 2024, unless it is replacing an NCP carrier vessel of the same flag.	✔ 100% observer coverage on carriers only  Safety measure adopted	✔ AIS not required and not required to report entry/exit  VMS required	✔	✔	✔ Pre event to flag State & applicable coastal State  Post event to flag State, landing State & Sect  Annual summary	✔ No data sharing	✔ List of authorized carriers public  List of fishing vessels authorized to t/ship not public	✔ Infractions reported  Not automatically included on draft IUU list	✗	✗ Required 24 hours notice

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<sup>1</sup> Some RFMOs have MOUs with other RFMOs, which provide that data and information can be exchanged consistent with the policies of each Commission. However, generally speaking, transshipment data is non-public domain data and its release may require the approval of the respective RFMO Commissions.

RFMO	Application				MCS, Data Reporting & Sharing							Authorization & Notifications		
	Includes all vessels operating outside their EEZ and/or in one or more EEZs	Covers all RFMO spp, and spp caught in association with regulated fisheries; all transfers of RFMO regulated spp. recorded on t'shipment declaration	Applies to all areas within RFMO competence	Receiving vessels must be flagged to CPCs or CNMs	100% observer coverage (human or EM) on both the fishing vessel & the carrier vessel + Binding measure on observer safety	Require VMS and AIS; data to RFMO in near real-time; manual reporting every 4 hours in case of malfunction; carriers notify RFMO of entry and exit	Require IMO # to be authorized to transship	Prohibit from acting as both fishing and receiving vessel on the same trip	Pre & post event data provision to: RFMO, flag States, intended port or landing States, coastal States, & annual summaries	Standardize all t'shipment declaration data and formats + Data Sharing among RFMOs <sup>2</sup>	Provide a public list of all vessels authorized to transship	Infractions reported to flag States and RFMO; if insufficient action taken vessel automatically included on Draft IUU Vessel list	Guidelines, incl. criteria, for authorizing transshipment by flag State, and a review process of authorizations	Advance notice of 48 hours provided for t'shipment
IOTC Related measure: Res 25/05	✓	✓ Covers RFMO spp and those caught in association  Not applicable to t'ship of IOTC managed resources outside of Convention Area when subject to a comparable RFMO monitoring program; info on spp t'shipped outside the Convention area must be reported to the IOTC Sect.	✓	<i>Prohibits any new authorizations for carrier vessels not flagged to a CPC from 1 April 2025. Existing authorized NCP flagged carriers may continue transshipment operations.</i>	100% observer coverage on carriers only  No safety measure adopted	AIS not required and not required to report entry/exit  VMS required	✗ Exceptions for Indonesia pilot program <sup>3</sup>	✗	Pre event to flag State only (Res 25/05)  Post event to flag State, landing State and Sect  Annual summary public	No data sharing	✓	Infractions reported  Not automatically included on draft IUU list	✗	✗ Required 24 hours notice
WCPFC Related measures : CMM 2009-06 CMM 2014-02 CMM 2018-06	✓	✓	Excludes transshipment of stocks taken and transshipped wholly in archipelagic waters or territorial seas. Transshipments in port or in waters under national jurisdiction take place in accordance with applicable national laws.	Except when non-member flagged vessel is under charter, lease or other arrangement	✓ 100% observer coverage on carriers or offloading vessels only <sup>4</sup>  Observer safety measure covers all observer deployments	AIS not required and not required to report entry/exit  VMS required	✓	✗	Pre and post event only to Sect  Annual summary	Data is standardized through SSPs on minimum data fields for observers, standardised reporting templates, and e-reporting standards.  Non-public domain data is not shared without consent	✓	Infractions reported  Not automatically included on draft IUU list	✗ In 2017, mandated to develop guidelines for "impracticability" of not transshipping at sea; no progress to date	Requires 36 hours advance notice

<sup>2</sup> Some RFMOs have MOUs with other RFMOs, which provide that data and information can be exchanged consistent with the policies of each Commission. However, generally speaking, transshipment data is non-public domain data and its release may require the approval of the respective RFMO Commissions.

<sup>3</sup> Except for those vessels involved in the Indonesian Pilot Program for which feasibility of an IMO number is being explored.

<sup>4</sup> Paragraph 13(a) of CMM 2009-06 states, "for transshipments to receiving vessels less than or equal to 33 meters in length, and not involving purse seine caught fish or frozen longline caught fish, 100% observer coverage starting on the effective date of this Measure, with the observer(s) deployed on either the offloading vessel or receiving vessel."