

7 April 2020

To Whom It May Concern:

This letter is submitted on behalf of the undersigned 19 organizations to express our concern that, in contemplating or enacting emergency measures to protect human safety in light of the COVID-19 pandemic, there have been proposals to relax or, in some cases, suspend important monitoring, control and surveillance measures (MCS) for commercial fisheries indefinitely and without further consideration.

We recognize the unprecedented challenges presented by COVID-19 and the need to ensure the health and safety of those working onboard fishing and carrier vessels as well as that of the communities onshore during this global pandemic. In particular, we understand the difficulties with meeting human observer coverage requirements at this time, given widespread travel restrictions in many regions and the very real and legitimate concern for the virus to be transmitted and then brought onshore, especially for developing States and Small Island Developing States.

However, removal of key MCS elements, such as human observer coverage, bans on at-sea transshipment, port inspection, and high seas boarding and inspection would weaken the links that maintain the verifiability of fishing-related activities throughout the seafood supply chain. It would open the door to increased illegal, unreported and unregulated (IUU) fishing and, in doing so, could undermine the recovery and resilience of many important fish stocks globally. It is important that fisheries managers take these impacts into consideration when developing emergency measures, particularly at a time when approximately 33 percent of global fish stocks are overfished and IUU fishing worldwide is reported to already account for up to \$23.5 billion in catch, or one in five wild-caught marine fish.

Despite the current challenges, there is a path forward that would protect the health and safety of observers, crew, inspectors and onshore communities, while mitigating the loss of scientific and compliance information to fishery managers in RFMO Secretariats and port, coastal and flag States. Requiring the increased use of alternative methods for collecting, sharing and auditing of data would promote compliance with, and support of, existing conservation and management measures and data collection requirements in the absence of human observers and inspectors. It would also provide some reassurance to the market of the traceability and verifiability of the global seafood supply, in this unsettling time, without jeopardizing food security more broadly.

We urge fishery managers and RFMOs to take the following suite of practical actions that could be applied in short order as a complement to any measures that reduce oversight of fisheries during the COVID-19 pandemic:

- Ensure that any steps to relax, suspend or remove requirements for observer coverage on fishing and carrier vessels, high-seas boarding and inspection, and/or port inspection, or other form of physical oversight, are limited only to the period of emergency resulting

from COVID-19 and based on expert advice related to human health and safety risks, and a date is set for when these suspensions or alternative measures will be reviewed;

- Require vessels whose observer coverage requirements have been waived to collect, record and report all the observer-provided data;
- Prioritize the development of electronic reporting and electronic monitoring technologies, standards, and programs for use on fishing and carrier vessels, which would allow EM to complement human observers, or if necessary, replace them now or in similar situations in the future;
- Immediately increase VMS polling rates for affected vessels to no less than hourly, which will allow vessels' positions to be verified from port-to-port and therefore enable contact tracing;
- Immediately require the broadcast of AIS data from suitably equipped fishing vessels and carrier vessels as a complement to VMS;
- Immediately ban manual reporting in the case of VMS failure and require vessels that do not report on VMS, experience a VMS 'failure', or cannot broadcast on AIS to immediately stop fishing and return to port, while ensuring this does not convey a disproportionate effect on developing States;
- Require reporting to port State authorities prior to vessels making port visits, including advance notice of desired entry accompanied by data on the catch onboard and vessel history, interactions with other vessels and carriers and previous port access, which would allow port States to make more informed decisions with respect to entry requests;
- Publish a list of authorized transshipments, including their time and location, that occur during the emergency period;
- Dedicate additional resources to the analysis of VMS and AIS data, to support port States in carrying out necessary risk assessments; and
- Increase port inspections and strengthen cooperation and information sharing with port authorities of other relevant coastal States;

The COVID-19 pandemic has created legitimate concerns over the potential exposure of observers, crew, inspectors, and port workers to the virus. At the same time, there are reports from many markets of spikes in the demand of canned seafood, including tuna, adding further pressure to all fished stocks. There is an urgent need to protect people in the short-term but also to ensure that, once this crisis is over, sea-dependent livelihoods and economies are not threatened by a blanket suspension of MCS measures.

The most successful examples of countries and industries fighting this pandemic have technological solutions in the heart of their approach. Fisheries should follow suit. Enhanced electronic monitoring such as the measures described above, together with stricter reporting requirements, can help alleviate these concerns while at the same time still providing a good degree of oversight.

Sincerely,

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