



Call for the IOTC to support stronger transparency and anti-IUU fishing measures

April 2026

The Environmental Justice Foundation (EJF), Oceana, The Pew Charitable Trusts and WWF are working together in a coalition¹ of non-governmental organisations to ensure that the EU's engagement with Regional Fisheries Management Organisations (RFMOs) and key partners leads to strong transparency and anti-illegal, unreported and unregulated (IUU) fishing measures worldwide.

In a coalition report titled "[Achieving transparency and combating IUU fishing in RFMOs](#),"² we outline the minimum transparency and anti-IUU fishing measures that we consider essential for RFMO Contracting Parties, Cooperating non-Contracting Parties (CPCs) and fishing entities to adopt and implement in order to end IUU fishing. The report's annexes are updated annually to reflect the progress achieved in RFMOs in adopting these key measures. Out of the 20 indicators evaluated, only 8 have so far been adopted by the Indian Ocean Tuna Commission (IOTC).

To promote transparency and tackle IUU fishing, we ask IOTC CPCs to prioritise the following actions:

- 1) Adopt a (partially) centralised Vessel Monitoring System and Revise Resolution 15/03 On the Vessel Monitoring (VMS) Programme
- 2) Expand IMO number requirements to include all eligible vessels by revising Resolution 19/04 Concerning the IOTC Record of Vessels Authorised to Operate in the IOTC Area of Competence
- 3) Adopt a new Resolution to improve traceability through an electronic Catch Documentation Scheme
- 4) Improve effective compliance of beneficial ownership requirements under *Resolution 19/04 Concerning the IOTC Record of Vessels Authorised to Operate in the IOTC Area of Competence*
- 5) Strengthen *Resolution 24/05 Establishing a Programme for Transshipment by Large-Scale Fishing Vessels* to further improve monitoring, control and surveillance and reduce opportunities for IUU fishing activities
- 6) Establish a high seas boarding and inspection scheme to strengthen monitoring, control and surveillance in the IOTC Convention Area
- 7) Adopt measures for the safety, wellbeing and security of crew on board and human observers providing transparent reporting and investigation of operational incidents at sea and for the crew members involved

¹ <http://www.iuuwatch.eu>

² <http://www.iuuwatch.eu/2019/06/new-report-achieving-transparency-and-combating-iuu-fishing-in-rfmos/>

1) Adopt a (partially) centralised Vessel Monitoring System and revise Resolution 25/02 On the Vessel Monitoring System (VMS) Programme

The EU IUU Fishing Coalition is disappointed by the 2025 Commission decision to pause the work on introducing a (partially) centralised VMS in the IOTC Convention Area. Following eight meetings of the VMS Working Group since 2021, the completion of just half of its assigned tasks and the dead end reached, it is evident that a new approach is needed to revive deliberations and agree on a tangible and more ambitious workplan so that IOTC can adopt a regional VMS before the end of the decade.

Current IOTC Resolution 25/02 requires vessels 24m or above or, in the case of vessels less than 24m, those operating in waters outside the EEZ of the flag State fishing for IOTC species in its Area of Competence, to be monitored by VMS. However, there is no regional centralised VMS, no requirement for data sharing between flag and coastal States and the resolution is recognised as in need of updating.

Monitoring of vessel movements should be mandated for all vessels of any size and type that are authorised to fish in areas beyond national waters or which are carrying out fishing-related activities. This includes fishing and associated support vessels, including but not limited to fish carriers and bunkering vessels, as these vessels are typically authorised to engage in fishing related operations, such as transshipment. Robust VMS can improve continuous port-to-port operation through secure communications systems that are type-approved and tamper-proof, as well as sealed, fully automatic and have adequate backup and recovery procedures to ensure reliability.

The development of a (partially) centralised VMS must be a priority for IOTC and would align it with best practice implemented by other RFMOs. We call on CPCs to:

- **Reiterate their commitment for a (partially) centralised fit for purpose VMS and agree on a fresh mandate for a renewed VMS WG with new leadership and specific timeline for introducing a CMM to the Commission.**
- As an interim solution and in parallel, revise Resolution 15/03 On the Vessel Monitoring System (VMS) Programme as soon as possible by including amendments in line with the above recommendations as well as best practices on the access and use of VMS and automatic identification system (AIS)³ data, such as for investigating IUU fishing cases.

Until a centralised VMS is in place, the EU IUU Fishing Coalition also urges IOTC to adopt interim measures. These could include authorising the Secretariat to conduct analyses of vessel operations in the IOTC area by utilising other available data to track vessels and by adopting the targeted amendments proposed for the existing measure to strengthen data sharing provisions.

2) Expand IMO number requirements to include all eligible vessels by revising Resolution 19/04 Concerning the IOTC Record of Vessels Authorised to Operate in the IOTC Area of Competence

Resolution 19/04 establishes a record of vessels authorised to operate in the IOTC Area of Competence that includes those “(a) 24 metres in length overall or above; or (b) in case of vessels less than 24 metres, those operating in waters outside the Economic Exclusive Zone of the flag State; and that are authorised to fish for tuna and tuna-like species in the IOTC area of competence.” The Resolution also requires that the flag CPCs of these authorised vessels submit a series of information including IMO numbers. These are free and permanent unique vessel identifiers that stay with a vessel from construction through to disposal, regardless of flag or where it operates. They are essential for the effective and reliable monitoring of vessel activity and for tracking compliance throughout its lifespan. IOTC has been one of the pioneering RFMOs, requiring IMO numbers for registered vessels since 2007.

³ For more information, please see <https://www.imo.org/en/ourwork/safety/pages/ais.aspx>

Now it has the opportunity to expand these requirements even further to all eligible vessels 12 metres in length or larger, including for vessels operating in waters outside of the economic exclusive zone of the flag CPC. This should significantly improve monitoring and control of fishing activities by capturing a larger share of the active fleet.

We call on CPCs to adopt Proposal D Concerning the IOTC Record of Vessels Authorised to Operate In the IOTC Area of Competence that updates Resolution 19/04 and increases the minimum vessel threshold in order to cover all eligible vessels down to 12 metres in length overall.

3) Adopt a new Resolution to improve traceability through an electronic Catch Documentation Scheme (CDS)

The EU IUU Fishing Coalition is disappointed by the decision in 2025 to pause the work of the CDS WG in anticipation of the outcome of the work within ICCAT on CDS.

RFMOs need to deliver effective enforcement mechanisms and create a culture of compliance with fishing regulations among their CPCs. One of the most effective mechanisms for monitoring catches and preventing IUU fishing is the adoption of electronic Catch Documentation Schemes (e-CDS). CDS offer a cooperative, systematic, and collaborative way to ensure the legal provenance of catches throughout the supply chain. Although a CDS may not prevent all forms of IUU fishing, it can complement other monitoring, control, and enforcement efforts, and significantly improve traceability along the value chain. Electronic CDS can enable real-time monitoring of import documentation controls, while simplifying and speeding-up procedures by reducing the administrative burden of authorities, ultimately benefiting all actors of the supply chain. **The development of an electronic CDS for all IOTC species must be a priority for CPCs, with overfished species prioritized.**

In 2019, the IOTC approved a decision to form a working group to guide the development of a CDS. Since then, the working group has held 11 meetings. Regrettably, these have been generally poorly attended. Nonetheless, through the commitment of this WG, a [4th iteration of the IOTC CDS Strategy](#), together with a [companion document](#) and a [concept paper](#) with a draft resolution were developed. These include clear guidance on the scope and objectives, initial species to be covered and, importantly, clear time-bound next steps. We therefore urge CPCs to implement this strategy to adopt an IOTC CDS Resolution during the 2025 meeting of the Commission.

Ahead of the conclusion of ICCAT's CDS work, the EU IUU Fishing Coalition urges CPCs to revive the CDS WG in order to:

- **Finalise the draft IOTC CDS Resolution.**
- **Start preparatory work for linking the future IOTC eCDS to IOTC's e-PSM system and other relevant platforms that monitor and verify fishing vessel data and catches and could be used to cross-check data for risk-based analysis to ascertain that only legally caught fish can reach markets.**
- **Expand the data field in IOTC's statistical document reporting to improve data gathering including in relation to the catch area and gear.**

To support this, the EU IUU Fishing Coalition has published a report to assess the strengths and weaknesses of existing multilateral CDS systems and a proposal for a way forward for a globally harmonised baseline of key data elements.⁴

⁴ http://www.iuuwatch.eu/wp-content/uploads/2021/12/EU-IUU-Fishing-Coalition_Seafood-Traceability-Report_Dec-2021-1.pdf

4) Improve effective compliance of beneficial ownership requirements under *Resolution 19/04 Concerning the IOTC Record of Vessels Authorised to Operate in the IOTC Area of Competence*

Ensuring accurate and reliable vessel ownership information is critical to prevent and combat IUU fishing within the IOTC Convention Area. Resolution 19/04 mandates the submission of comprehensive information regarding the beneficial owner (BO) of a fishing vessel - the person or entity who profits most from the vessel's activities. While article 3.I requires CPCs to submit data on the "Name and address of beneficial owner(s), if known and different from vessel owner/operator or indicate non-availability", the practical implementation has encountered challenges. Unfortunately, most CPCs are struggling or refusing to share this crucial information, and in many cases what is submitted is inaccurate, or often limited to the registered owner, as demonstrated in the summary compliance reports and WPICMM reports⁵ from 2021-2023, the last period where such an analysis was published by IOTC.

In a new NGO analysis of IOTC's record of vessels authorised to operate in the Convention Area in 2026,⁶ we found that of the 20 IOTC CPCs with vessels in the record, plus Singapore and the fishing entity of Taiwan, China,

- 10 CPCs, all low or middle income countries, have reported BO information for all their vessels: India, Indonesia, Kenya, Liberia, Madagascar, Maldives, Mauritius, Seychelles, South Africa and Sri Lanka.
- 6 CPCs have reported BO information for the majority of their vessels: China (93.7%), Japan (93.7%), Korea (86.8%), Panama (73.7%), Tanzania (66.7%) and Thailand (55.6%).
- 3 CPCs have reported BO information for a minority of their vessels: Australia (4.1%), Malaysia (3.3%) and Oman (45.4%).
- 2 CPCs and the fishing entity of Taiwan, China have reported no BO information for their vessels: EU (0%), Singapore (0%) and the fishing entity of Taiwan, China (0%).

The EU IUU Coalition urges IOTC to intensify efforts aimed at enhancing effective compliance with Resolution 19/04 through the work of the Compliance Committee and WIPICMM by:

- **Introducing beneficial ownership as an agenda item for dedicated discussion.**
- **Seeking clarification from CPCs with 0% compliance on the specific reasons of non-compliance, including the relevant national regulation preventing them from reporting beneficial ownership information.**
- **Working with the CPCs that partially comply to better understand their situation and encourage 100% compliance.**
- **Develop BO implementation guidelines which would include standardised terminology and punctuation for ease of review. The guidelines could draw upon existing national definitions and/or international guidance, such as the Financial Action Task Force (FATF)⁷ and OECD⁸.**

⁵ IOTC-2021-CoC18-03_Rev3 [E], IOTC-2022-WPICMM05-11, IOTC-2022-CoC19-03 [E] and IOTC-2023-CoC20-03 [E].

⁶ Environmental Justice Foundation, Global Fishing Watch, Oceana, The Pew Charitable Trusts and WWF, Beneficial Ownership Recommendations for IOTC, April 2026, https://www.iuuwatch.eu/wp-content/uploads/2026/04/IOTC_Beneficial-Ownership-brief_FINAL.pdf

⁷ <https://www.fatf-gafi.org/en/pages/fatf-glossary.html>

⁸ https://www.oecd.org/tax/transparency/documents/effective-beneficial-ownership-frameworks-toolkit_en.pdf

5) Strengthen Resolution 24/05 Establishing a Programme for Transshipment by Large-Scale Fishing Vessels to further improve monitoring, control and surveillance and reduce opportunities for IUU fishing activities

Clear rules for transshipment are essential to ensure a strong, legal and verifiable seafood supply chain and reduce opportunities for illicit fishing products to be laundered during transport. According to the Secretariat's reports in 2022⁹, at-sea transshipment events increased by 118% between 2014 and 2021, and the amount of fish transferred rose by 49% during that same period.¹⁰ As transshipment events and tonnage transfers continue to increase, there is a corresponding need to ensure that each event is properly monitored and regulated by relevant authorities. The adoption of Resolution 22/02 helped improve the transshipment regulatory regime, for instance through the requirement of IMO numbers in transshipment notifications and in the IOTC record of carrier vessels. Nonetheless, there is room for improvement, notably to align the IOTC measures with the FAO Voluntary Guidelines for Transshipment.¹¹

The EU IUU Fishing Coalition therefore calls on CPCs to adopt Proposal P On Establishing A Programme For Transshipment by Large-Scale Fishing Vessels and include the following recommendations to improve monitoring and control of transshipment activity, in line with the FAO guidelines and in relation to large scale tuna longline vessels (LSTLVs):

- **Remove all at-sea exemptions in the transshipment measure to ensure consistency and a level playing field for all members and vessels.**
- **Require that all vessels involved in transshipment events, including carrier vessels, have the necessary authorisation available to inspectors and, crucially, be flagged to a CPC or, at the very least, to a CNCP, in order to be included on the IOTC authorised vessel records.¹²**

6) Establish a high seas boarding and inspection scheme to strengthen monitoring, control and surveillance in the IOTC Convention Area

Duly established high seas boarding and inspection procedures, as called for in Articles 21 and 23 of the UN Fish Stocks Agreement, are crucial to ensure compliance with conservation and management measures. CCAMLR and other RFMOs, like NAFO and more recently WCPFC, have adopted a scheme to ensure effective, transparent, and consistent high seas boardings and inspections in their respective area. Others, like ICCAT, have initiated discussions on expanding relevant pilot projects. The explicit requirement for the establishment of boarding and inspection schemes in certain RFMOs' conventions or agreements is a recognition of their added value in ensuring effective control of fishing activities.

At its 2022 annual meeting, the Commission agreed that the IOTC Working Group on High-Seas Boarding and Inspection (WGHSBI) must be revived, and that Terms of Reference be developed to define its mandate.

The EU IUU Fishing Coalition calls on all CPCs to adopt Proposal O On a High Seas Boarding and Inspection Scheme and to actively engage in HSBI discussions ahead of the rollout of an HSBI scheme. To facilitate the discourse, we have submitted a briefing paper on the topic.

⁹ https://www.iotc.org/sites/default/files/documents/2022/04/IOTC-2022-CoC19-04a_E_-_Report_on_Transshipments.pdf; https://www.iotc.org/sites/default/files/documents/2022/04/IOTC-2022-CoC19-04b_E_-_IOTC_ROP_Contractor.pdf; https://www.iotc.org/sites/default/files/documents/2015/03/IOTC-2015-CoC12-04a_E_-_Report_on_Transshipment_Res_14-06.pdf

¹⁰ 41,192.34 tonnes in 2014 (https://www.iotc.org/sites/default/files/documents/2015/03/IOTC-2015-CoC12-04a_E_-_Report_on_Transshipment_Res_14-06.pdf) and 61,524.97 tonnes in 2021.

(https://www.iotc.org/sites/default/files/documents/2022/04/IOTC-2022-CoC19-04a_E_-_Report_on_Transshipments.pdf)

¹¹ <https://www.fao.org/documents/card/en/c/cc1964en>

¹² Acknowledging the complexities associated with Taiwan, Province of China.

7) Adopt measures for the safety, wellbeing and security of crew and human observers on board fishing vessels, providing for transparent reporting including of operational incidents at sea and for the crew members involved

Improved labour conditions are essential for safeguarding the rights and well-being of the often vulnerable workers onboard fishing vessels. Many fisheries are characterised by challenging working conditions, extended periods at sea, and exposure to dangerous elements. Ensuring humane working conditions, fair wages, safe working practices and access to Wi-Fi are not only ethical imperatives but also essential for retaining a skilled and motivated workforce.

Incorporating core labour standards in line with ILO's Work In Fishing Convention (C188) into IOTC's framework and reporting requirements can also enhance transparency and value to IOTC's fisheries. Ensuring that fish products are sourced from vessels adhering to high labour practices, enables consumers and seafood markets to make more informed and sustainable choices.

Furthermore, observers play a vital role in ensuring fishing takes place in compliance with applicable conservation and management measures, but these important responsibilities come with high risks of abuse, intimidation, and even physical violence. More generally, fishing remains one of the most dangerous jobs, with reportedly [more than 100,000 fishing-related deaths occurring every year](#), and with IUU fishing one of the main drivers.

Sadly, increasing instances of fisheries observer deaths, as well as violations of fishing crew welfare, have been reported to authorities and NGOs in recent years. IOTC CPCs have a responsibility to minimise these risks within their fleets and jurisdictions, transparently report any operational incidents at sea, and guarantee a safe working environment for human observers.

The EU IUU Coalition calls on CPCs to:

- **Initiate a dialogue aimed at proposing minimum working and safety conditions on board fishing vessels. These should eventually be aligned with relevant international instruments such as ILO's C188 and the IMO Cape Town Agreement on Fishing Vessel Safety (CTA).**
- **Adopt a Conservation and Management Measure for Observer Safety and Security following best practice examples such as those adopted by WCPFC (CMM 2017-01 and Resolution 2018-01) and develop binding Labour Standards for Crew on Fishing Vessels that also address crew welfare.**
- **Ensure transparent reporting by vessel operators and fishery managers by providing 100% transparency and accountable IOTC reports that include all aspects of fishing of public resources in general, and investigations into human and labour rights violation in particular.**
- **Ensure licensing authorities keep accurate records on vessels and their crew, taking proactive measures to prevent incidents which violate human and labour rights.**
- **Propose and adopt a new recommendation encouraging Contracting Parties to ratify and effectively implement international instruments such as the ILO C188 and IMO CTA, particularly now that the latter will enter into force in February 2027.**