



LDAC ADVICE

Recommendations for the 22nd Regular Session of the Commission of the Western and Central Pacific Fisheries Commission (WCPFC22)

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1. Management of tropical tunas

1.1. Management procedures

Background

The work on multi-species Management Strategy Evaluation is going on. The model will provide a total number of fishing days for purse seiners and longliners.

In the context of this work, the Day Allocation Scheme in high seas might be discussed this year. Currently, no capacity limitation applies to the Parties to the Nauru Agreement (PNA), in high seas, to the contrary to other parties.

Recommendation

- **The LDAC recommends, unless the PNA is willing to accept a limit, to keep the statu quo on the Day Allocation Scheme.**

1.2. Observer coverage

Background

At WCPFC 20 in 2023 there was a proposal from The Parties to the Nauru Agreement (PNA) to improve monitoring and control measures for skipjack, yellowfin, and bigeye tuna stocks in the Western and Central Pacific Ocean (in Tropical Tuna measure CMM 2023-01), introducing an increase for longline observer coverage, through on-board or electronic observers, up to 30%.

However, it was finally agreed in WCPFC 20 that observer coverage would need to be increased proportionally, up to 10%, to catch increases for bigeye tuna. CPCs that did not plan to increase their catches would not need to go beyond 5% observer coverage¹.

The LDAC notes that though WCPFC wanted it as incentive, observer coverage is a necessity, and there is a risk for under reporting to evade the increase.

¹ Table 3 of CMM 2023-01 on bigeye, yellowfin and skipjack tuna in the WCPO, p.15



Recommendations

- The LDAC recommends that, rather than the measures that have been adopted for the bigeye tuna, the EU demand an expansion of the Commission's regional observer programme and to prioritise increasing independent monitoring of those fleets where the collection of independent data is low, such as longliners. This can be done by integrating national programmes into the regional one and gradually increasing annually observer coverage combining on-board and/or electronic monitoring, for skipjack, yellowfin, and bigeye tuna fisheries, independently from any catch increase.
- To make the above recommendation operational, the LDAC recommends that the EU support the continued development of a Commission EM programme that builds on the minimum technical standards and minimum data fields for electronic monitoring adopted in 2024². To encourage successful implementation and provision of more and better quality data, the EU should recommend that the Electronic Reporting and Electronic Monitoring Working Group (ER and EM WG) prioritise the development of an accreditation and assurance program to ensure CCM domestic programmes meet the standards; create a standardised method for CCMs to submit EM-derived data, such as through standardised templates or technology-based submission processes such as APIs; and harmonise the definitions related to measuring coverage levels to ensure coverage is defined and calculated in the same way across fleets, CCMs and RFMOs.
- Furthermore, the LDAC recommends the EU to support the adoption of a workplan to develop a CMM for a WCPFC Electronic Monitoring Program.
- In order to preserve level playing field for its longline fleet, the LDAC recommends that the EU puts pressure to all CPCs to respect and fully implement the current observer coverage rules or otherwise face the consequences as per CMM 2023-01.
- The LDAC advocates for the acquisition of better data: to avoid gaps in global catch data that would hinder future assessments, further measures to avoid unreported (IUU or transhipped) catches are necessary. The LDAC supports the observers scheme implementation in all CPCs targeting economically valuable shark species.

² WCPFC, Interim Electronic Monitoring Minimum Standards, Covering Technical, Data and Reporting Requirements: <https://www.wcpfc.int/doc/data-08/interim-electronic-monitoring-minimum-standards-covering-technical-data-and-reporting>

2. Management of Sharks

2.1. Oceanic whitetip sharks

Background

The SC21 notes in its Management Advice that the 2025 assessment of oceanic whitetip concluded that, while oceanic whitetip shark remains severely depleted at approximately 6% of unfished biomass (Table OCS-03), recent signs of recovery indicate conservation measures are likely providing some positive effects. The SC21 also notes that the largest reductions in mortality appear to have resulted from changes in longline fishing practices, suggesting that gear-based mitigation measures have been effective. However, given the subtle nature of estimated recovery and persistent uncertainties, continued monitoring is essential.

Recommendations:

- The LDAC acknowledges this small but encouraging improvement of the Oceanic whitetip shark population in the WCPFC and urges the EU to continue supporting the rebuilding of this and other overfished stocks of threatened sharks in the WCPFC, including oceanic whitetip sharks and silky sharks.
- The LDAC highlights the importance of the compliance with existing retention bans and conservation measures to effectively reduce oceanic whitetip shark mortalities and that these should be supplemented by following and implementing scientific recommendations to continuously improving best handling and release practices.
- The LDAC welcomes the SC21 recommendation to consider the content of the IATTC Best handling and release practice guidelines for sharks (SAC-16-10) for the review of the WCPFC Conservation and Management Measures for Sharks (CMM 2024-05). However, LDAC recommends that these best handling and release practices should be adopted immediately and not have to wait until the planned revision of CMM 2024/05 in 2027. The EU should therefore propose to include these best handling and release practices already at this year's Commission Meeting.

2.2 Hammerhead sharks

Background

Eight out of nine hammerhead shark species (Sphyrnidae) are listed as threatened by IUCN. Yet, WCPFC does not include these species as Key Species for Data Provision and Assessment (WCPFC Key Document SC-08) and no specific conservation measures have been taken to protect them. Consequently, substantial bycatch and retention of these species occur despite the absence of species specific observers' data and estimated catches. This contrasts with ICCAT, which has banned retention since 2011 (Rec 10-08). Without species-level data, the status of hammerhead sharks cannot be adequately monitored or managed.



Recommendation

- **Given the substantial conservation concerns and the heavily depleted status of many hammerhead shark species, the LDAC urges the EU to propose that at least the three largest species of hammerhead sharks (*Sphyrna lewini*, *Sphyrna mokkaran* and *Sphyrna zygaena*) are listed as key species for which total catches, including discards, are estimated, and scientific data collected at species level. This will provide essential information for future stock assessments.**

2.3. Management Procedures for Commercially Fished Species of Sharks

Blue shark and Shortfin mako shark

Background

The LDAC notes that blue sharks are generally not a bycatch but an actively targeted species or secondary target species taken by several fisheries in WCPFC, including Taiwan, Japan, Spain, Vanuatu, and Fiji. Shortfin mako sharks are mostly caught in combination with blue sharks in longline fisheries targeting swordfish and blue sharks.

The LDAC notes that both species have clear commercial value and require CITES certification for the international trade. Yet, WCPFC has not developed reference points, adopted mortality limits, or allocated total allowable catches.

Stock assessments in 2022 found that North and South Pacific Blue Shark populations are neither overfished nor subject to overfishing [1], with a high probability of remaining so if fishing mortality stays below MSY. The 2024 North Pacific Shortfin Mako assessment indicated a 65% probability that the stock is also not overfished or experiencing overfishing, although significant uncertainties remain regarding catch data and biological parameters. [2] For the South Pacific Shortfin Mako, the last assessment was not considered robust enough and the status remains unknown due to insufficient data and gaps in reporting. [3]

The LDAC cautions that low observer coverage and uncertainty in reporting of shark catches (including discards) undermine confidence in total mortality estimates.

Recommendations

- **The LDAC encourages the EU to advocate for compliance of all CCMs with current reporting requirements (including discards)**
- **The LDAC recommends that the EU advocate for the development of MSE tested Management Procedures for both, blue and shortfin mako sharks. As an initial step, the EU should request that the Scientific Committee be tasked with developing target, threshold, and limit reference points for blue sharks, in parallel with the planned 2026–2027 stock assessments.**



2.4. Fins naturally attached policy

Background:

The EU has been a pioneer in ensuring full utilization of sharks through the adoption of its Regulation (EU) No 605/2013 (so-called “Shark Finning Regulation”).

In 2024 WCPFC has adopted a new shark measure (CMM 2024/05), that revised the provisions for “Full utilisation of shark and prohibition of finning”. For 2025, 2026 and 2027 all sharks must be landed with their fins naturally attached. However, two alternatives are still permitted: the wiring of cut fins to the carcass; and a tagging system allowing easy identification of corresponding fins and carcasses, both of which must be stored in the same hold.

Members states are required to report annually to the Secretariat explaining why an alternative had been used, how many vessels have used the alternatives, how monitoring and enforcement were ensured, and how incidences of non-compliance have been addressed. Failure to provide this information will cause the use of alternatives to expire in 2027 for this CCM.

The WCPFC has thus further strengthened its requirements by limiting the acceptable alternatives to only 2 and prohibiting the storage of cut fins together with the carcasses in bags. The Technical and Compliance Committee (TTC) and Commission are to review members’ compliance with these provisions by 2027

The LDAC also reminds that in 2025 the IOTC adopted Resolution 25-08 on the conservation of sharks caught in association with fisheries managed by IOTC, which limits alternatives to the fins naturally attached policy in the Indian Ocean, to binding fins to carcasses or using matching tags. These however apply only to sharks landed frozen. Each CCM could select only one of the alternatives that will apply for the complete period of 2026–2028. CCMs had to inform the Secretariat by 1 September 2025 about the selected alternative if any. Failure to report in any year the required compliance and enforcement information to the Compliance Committee makes that fishery ineligible to use any alternative, meaning it must comply fully with the fins naturally attached policy.

This is important to ensure reporting requirements and progressive implementation of the fins naturally attached policy also in the Pacific, where low observer coverage makes the detection of offenses, especially in small scale fisheries that land sharks fresh, particularly difficult if not impossible to detect.

Recommendations

- **The EU should request a review of CMM 2024/05 to tighten the provisions in line with adopted measures at IOTC.**
- **The EU should ask for clarification that the alternative reported for 2025 will also be applied in 2026 and 2027; if not confirmed, the Member must be bound to use only fins naturally attached.**
- **Members that fail to comply with reporting requirements should be immediately bound to fins naturally attached and shall no longer be allowed to use alternatives not waiting until 2027.**
- **Alternatives to fins naturally attached should only apply to sharks landed frozen; all sharks landed fresh should be required to be landed only with fins naturally attached.**

3. Monitoring of transshipments at sea

Recommendations

- **As requested in previous years, the LDAC reiterates its support to a process to eliminate transshipments at sea as soon as possible. However, for practical reasons, the LDAC promotes as a minimum requirement to start with the adoption of the following measures to better monitor transshipment at sea:**
 - **Implement real time, or near real-time, reporting requirements for all components of transshipments, including electronic verification and validation tools.**
 - **Ensure data fields on IMO numbers, date, location, catch and duration of the transshipment (start/stop times) are added to those fields in an oversight, those critical data fields were not included in the forms.**
 - **Support 100% observer coverage on delivering and receiving vessels engaged in at-sea transshipment.**
 - **Prioritise the development and application of EM for transshipment monitoring.**
 - **Support or endorse the use of technology to verify and validate transshipment activity.**
 - **Require reporting of non-fish transfers (e.g. exchanges of goods, crew, fuel etc.) involving registered WCPFC carriers.**

4. Deep sea mining (DSM)

Background

As indicated in the recent joint LDAC-NWWAC-PELAC-SWWAC advice on this matter³, the LDAC notes that the risks of deep sea mining for fisheries are alarming. Several studies have documented the significant negative impacts that DSM could have on marine ecosystems, including fisheries. Sediment plumes in different parts of the water column, noise pollution, and discharge from mining vessels could severely impact commercial species, in particular to highly migratory and widely distributed stocks such as tropical tuna, as noted in recent studies in the Pacific ([van der Grient and Drazen, 2021](#); [Amon et al., 2023](#)). These activities pose a threat not only to the species directly affected but also to the broader food webs and ecosystem services on which sustainable fisheries depend ([Drazen et al., 2021](#)).

³ https://ldac.eu/images/EN_LDAC-NWWAC-PELAC-SWWAC_Advice_on_DSM_and_Fisheries_4Nov2024.pdf



Recommendations

- The LDAC urges the European Commission to stay firm in their position to DSM to avoid taking premature steps into deep-sea mining, the risks of irreversible harm to marine ecosystems and long-term disruptions to fisheries being too great.
- The LDAC reiterates its calls for a moratorium on DSM until robust scientific evidence can demonstrate that it will not negatively impact marine ecosystems or jeopardise the livelihoods of those who depend on the sea, including fisheries. The precautionary principle must guide our decisions. By prioritising the reduction of mineral demand, the reuse of materials and the implementation of circular economy strategies, the EU should focus on enhancing competitiveness through truly sustainable and responsible practices.
- The LDAC supports the recommendations 203, 204 and 205 made by the Scientific Committee, namely:

203. SC21 supported the Secretariat's continued engagement with the International Seabed Authority (ISA) and requested that the Secretariat provide an update at WCPFC22 following the ISA Assembly's decision on WCPFC observer status.

204. SC21 encouraged the Secretariat to collaborate with other RFMOs to ensure consistent messaging, maintain awareness, and coordination on deep-sea mining issues related to fisheries in the Pacific Ocean.

205. SC21 further encouraged the Secretariat to link WCPFC scientific advice to ISA processes such as the development of Regional Environmental Management Plans and recommended strong WCPFC participation in future workshops to ensure tuna fisheries are considered in defining Areas of Particular Environmental Interest.

5. Catch documentation scheme

Background

Electronic Catch Documentation Schemes (e-CDS) are one of the most effective mechanisms for monitoring catches and preventing IUU fishing. They offer a cooperative, systematic and collaborative way to ensure the legality of catches throughout the supply chain and are key to achieving a level playing field as also indicated in previous LDAC advice, including of July 2021 for a Level Playing Field for EU and non-EU fish products⁴. Other regional fisheries bodies, such as CCAMLR, CCSBT and ICCAT, have successfully deployed such schemes for years, with the latter in advance discussions on expanding it to cover more stocks. Furthermore, other tuna RFMOs, such as IOTC, have adopted a workplan on gradually introducing an e-CDS.

⁴ LDAC Advice on LPF (2021): https://ldac.eu/images/EN_LDAC_Advice_LPF_25May2021.pdf



In December 2019, WCPFC19 updated the workplan for the Technical and Compliance Committee for the 2022-2024 and included in its core tasks the review of the work of Intersessional Working Groups (IWG) which includes the CDS IWG. We note with regret that this was not thoroughly discussed and the CDS IWG has remained essentially defunct, not convening since 2016. However, we are encouraged by the recent developments of the Joint IATTC and WCPFC-NC Working Group on Catch Documentation Scheme (CDS-06) and the agreed workplan for introducing an electronic Pacific Bluefin Catch Documentation Scheme (ePBCD).⁵ As the work progresses, it is crucial that the key data elements of this new CDS are aligned with existing schemes and best practices.

This includes ICCAT's eBCD and the latest version of the EU Catch Certificate as of 10 January 2026 and data fields such as IMO numbers, a better-defined catch area, authorisation to fish, port of landing and processing location.

Recommendations

- **The LDAC recommends the revitalisation of the CDS IWG with the ultimate goal of introducing electronic CDS in WCPFC and for the EU to ensure this is reflected in the 2025-2027 workplan of the Technical and Compliance Committee.**
- **To this effect, the LDAC recommends that the European Commission supports the work of the Joint IATTC and WCPFC CDS Working Group in establishing a CDS for Pacific bluefin tuna by the agreed deadline of 31 December 2026.**
- **Further, the LDAC recommends that the future ePBCD's key data elements are aligned with existing best practices such as EU's catch certification scheme.**

6. Port State Measures

Effective port State measures (PSMs) minimise the risk of illegally caught fish entering international markets. WCPFC adopted a CMM on minimum standards for ports State measures in 2017. The resolution is non-binding, and members must designate ports to opt-in – unfortunately only a small proportion of Members and CPCs (10 of 33) have done so.

The LDAC welcomes the agreement by Members and CPCs in 2024 to set-up a working group led by Fiji to carry out a review of CMM 2017-02 in 2025.

⁵ Chair's Summary of the 6th Catch Documentation Scheme (CDS) Technical Meeting:
<https://meetings.wcpfc.int/node/26475>



Recommendations

The LDAC recommends that the revised CMM, at a minimum should align with the PSMA and include the following provisions that:

- **Require port designation and advance entry requests.**
- **Allow for authorisation and denial of port entry.**
- **Ensure effective national coordination and exchange of information to facilitate risk assessment in port.**
- **Develop a fund to support developing States and small island developing States to opt into the current measures or implement a revised measure.**

7. Labour Standards

Background

The LDAC has serious concerns regarding current approach to crew labour standards.

The WCPFC Rec. 2024/04, which was adopted in 2024 and is to be implemented in 2028, failed to meet the minimum requirements laid out in the ILO Convention No. 188 (C188) "Work in Fishing", undermining significantly the international labour standards

It is crucial that the EU's internal and external action remain consistent, ambitious, and aligned with international conventions.

Recommendations

- **The LDAC reminds that C188 sets the absolute baseline for acceptable working and living conditions in the fishing sector. Any standard below ILO C188 should not be legitimised by the European Commission.**
- **The LDAC also recommends that the Standards of Training, Certification and Watchkeeping for Fishing Vessel Personnel (IMO STCW-F) must not be similarly undermined.**

8. Coordination with other international treaties

Background

The LDAC notes that ICCAT took a decision on 2023⁶ on how to articulate its work on the international legal instruments such as the WTO Fisheries Subsidies Agreement, the Global Framework on Biodiversity Kunming-Montreal and the UN BBNJ Treaty.

⁶ [ICCAT Doc. PLE 121/2023](#)



The LDAC welcomes the recent ratification of 60 parties of the UN BBNJ, which will entry into force in January 2026. The LDAC asks the EU to defend the importance of well articulating the implementation of the BBNJ Agreement with the binding mandates and operational frameworks of RFMOs. The BBNJ presents a valuable opportunity to improve protection of marine biodiversity in areas beyond national jurisdiction, and its success will depend on the complementarity of its measures with existing regional fisheries management regulations and efforts. To avoid duplication, inefficiencies, or regulatory gaps, it is essential that BBNJ mechanisms build on and reinforce the science-based decision-making processes and scientific expertise already in place in RFMOs. In this respect, the inter-RFMO group coordinated by FAO seems a suitable forum for this coordination, where the WCPFC should be actively present and involved.

Recommendations

- **The LDAC shows concern on how the implementation of these three international agreements may overlap with the work of the RFMOs and emphasizes the need for adequate coordination.**
- **The LDAC recommends therefore that a similar process be initiated in WCPFC.**

9. Beneficial Ownership

Background

The LDAC stresses that opacity in vessel ownership enables IUU fishing and shields those who ultimately profit from held to account. Beneficial ownership (BO) transparency is therefore critical to strengthen compliance and deter illicit activity. Further, we would like to remind that a working paper submitted by the Secretariat at the TCC21 meeting,⁷ shows that the lack of ownership information resulted in the second highest number of potential IUU fishing cases that could not be investigated.

Recommendations

- **The LDAC recommends that the EU calls for WCPFC to adopt harmonised BO definitions aligned with FATF and OECD guidance, and to require CPCs to collect and report BO data as part of vessel authorisation.**
- **The EU should also support integrating BO information into the WCPFC compliance framework, including vessel records and the IUU vessel list, and encourage CPCs to share BO data through the FAO Global Record. Enhanced BO transparency will close loopholes exploited by IUU actors and ensure that measures target the true beneficiaries.**

-END-

⁷ Technical and Compliance Committee, Twenty-First Regular Session, Matters Related to the Issue of CCFS Cases Older Than 24 Months: <https://meetings.wcpfc.int/node/27164>