



North Pacific Fisheries Commission

NPFC-2025-COM09-OP03

Observer paper submitted by The Pew Charitable Trusts

**Statement to the 8th Meeting of the Technical and Compliance Committee and 9th Annual Session of
the North Pacific Fisheries Commission**

Osaka, Japan

Abstract: An observer statement from The Pew Charitable Trusts with recommendations for actions by
Members at the upcoming TCC and Commission meetings.

The Pew Charitable Trusts' Statement to the 8th Meeting of the Technical and Compliance Committee and 9th Annual Session of the North Pacific Fisheries Commission Osaka, Japan

The Pew Charitable Trusts welcomes the opportunity to participate as an observer to the 8th Meeting of the Technical and Compliance Committee (TCC) and 9th Annual Session of the North Pacific Fisheries Commission (NPFC). On this 10th Anniversary of NPFC's creation, we encourage Members to build on last year's achievements and enhance governance and resilience of NPFC's fisheries and marine ecosystems. Specifically, members should:

Increase oversight and data-sharing of transshipment activities

In recent years, NPFC has strengthened oversight of transshipment in its waters by adopting Conservation and Management Measure (CMM) [2024-03](#) and establishing [data sharing agreements](#) to enhance regional cooperation. CMM 2024-03 sets a deadline to adopt a transshipment observer program this year. To meet this requirement, **the Commission should adopt the Small Working Group on Planning and Development's (SWG PD) proposal for a NPFC Transshipment Observer Program**, which will formalize observer safety and training protocols, harmonize reporting requirements, and encourage the development of EM standards for transshipment monitoring. Furthermore, **the Commission should task the Secretariat to develop and submit a data-sharing agreement with the Inter-American Tropical Tuna Commission's (IATTC)**, to facilitate the formal exchange of scientific and fisheries data between the two Commissions, given the overlapping management areas and transshipment operations.

Reduce opportunities for illegal, unreported, and unregulated (IUU) fishing

NPFC is the only major RFMO that has not adopted port State measures. Without minimum port inspection standards in place, IUU fishers may be incentivized to use NPFC ports as an avenue to launder their catch and gain access to the seafood supply chain. As noted in NPFC's [Performance Review](#) (Recommendation 5.4.1) and [TCC workplan](#), **the Commission should adopt a CMM specifying minimum standards for port inspections**, consistent with the United Nations Food and Agriculture Organization (FAO) 2009 Port State Measures Agreement (PSMA). Further, **the Commission should collect beneficial ownership data for vessels listed on the NPFC Vessel Registry, and where possible, vessels listed on NPFC's IUU list** as well. As per [CMM-2023-01](#), NPFC currently collects basic "owner" information but does not collect the beneficial owner's name or country of residence. Collecting this data will help ensure that fishery managers know exactly who is fishing within the Convention Area and empower them to take appropriate and prompt action.

Advance improvements to the Compliance Monitoring Scheme

Pew welcomes the significant work the Commission undertook to adopt a permanent Compliance Monitoring Scheme (CMS), including the additional future work identified in Paragraph 27 of [CMM 2024-13](#). However, there are additional actions that the Commission can take to further enhance its effectiveness. **The Commission should adopt the SWG PD's proposed NPFC Rules of Transparency for TCC**, which would increase access to the CMS by allowing accredited observers to participate in NPFC's compliance review processes. Additionally, to further the establishment of a multi-year workplan of tasks to enhance the CMS, which is required by CMM 2024-13, **the TCC should directly task the SWG PD to prioritize development of additional elements of the CMS**, including audit points and corrective actions.

Protect the Emperor Seamount Chain and Northwestern Hawaiian Ridge

Recent studies show widespread vulnerable marine ecosystems (VMEs) in the Emperor Seamount Chain and Northwestern Hawaiian Ridge, with significant adverse impacts of fishing and derelict fishing gear having been observed there. A temporary prohibition of bottom fishing activities is consistent with the recommendations of

NPFC's performance review (Recs. 4.1.2 & 4.5.1) and fulfills the obligations in Articles 5-7 of the UN Fish Stocks Agreement and the NPFC Convention. Considering the best [scientific literature](#) available and in line with the precautionary and ecosystem approaches in NPFC's Convention, **the Commission should establish a precautionary prohibition of all bottom fishing activities in the Emperor Seamount Chain and Northwestern Hawaiian Ridge. Further, the Commission should adopt stronger abandoned, lost, or otherwise discarded fishing gear reporting requirements to enhance the effectiveness of [CMM 2024-15 on Marine Pollution](#).** These initiatives would enhance public confidence in NPFC fisheries and advance the Commission in meeting its objective of achieving sustainable fisheries while protecting the region's marine ecosystems.

[Prioritize management procedures for all NPFC priority species](#)

Pew welcomes the significant progress NPFC has made to adopt their first harvest control rule (HCR) for [Pacific saury](#). To sustain momentum from last year and align with the FAO Consultancy Report on Climate Change ([NPFC-2024-SC09-OP01](#)), the **Commission should adopt management objectives for Pacific saury, including those that account for its ecosystem role and ensuring robustness to climate impacts. Agreeing upon management objectives is a first step in developing a full management procedure (MP), tested by management strategy evaluation (MSE).** Beyond Pacific saury, and in line with Recommendation 3.2.2 of the [Performance Review](#), the **Commission should prioritize MSE and MP development of other stocks, such as chub mackerel, neon and Japanese flying squids, and sablefish.** This is particularly important for neon and Japanese flying squids – as demand for these squids continues to grow, NPFC should also expedite progress on their stock assessments and increase monitoring efforts to support science-based management that can adjust fishing pressure to match changing environmental conditions.

[Create a small working group on climate change to safeguard fisheries](#)

Pew commends NPFC's [Resolution on Climate Change](#) and the ongoing discussions to consider climate impacts on Convention Area resources, fishing activities and related socio-economic impacts, and taking into account the potential impacts of climate change in the development of CMMs. Building on this progress, and recommendations in the FAO Consultancy Report on Climate Change ([NPFC-2024-SC09-OP01](#)), **the Commission should establish a small working group on climate change that is tasked to develop a comprehensive, climate change workplan for 2026 adoption.** That workplan should include the following elements:

- A roadmap for [climate-informed MPs](#) for all NPFC species, integrating improved science on climate impacts, with timelines and resource needs.
- Development of a regional observer program to enhance collection of independent and verified data of activities at sea for scientific and compliance purposes, also in line with [Performance Review](#) Recommendation 3.4.4 and NPFC's [Convention](#) Article 7.
- Proposed research on climate impacts to NPFC's priority species (e.g., stock distribution shifts, productivity) to address data gaps that may affect MP performance.
- Scientific and management coordination efforts with other regional fishery management organizations and relevant organizations (e.g. Basin Scale Events & Coastal Impacts Project) on climate-tested MPs for transboundary species whose distribution or migrations are likely to be affected by climate change.

[Assess the impact of other relevant international agreements](#)

The Commission should consider the impact of recent international treaties - including the World Trade Organization's Agreement on Fisheries Subsidies and the United Nation's Biodiversity Beyond National Jurisdiction (BBNJ) Agreement - and continue discussions on how NPFC and its Members might assist relevant signatories to meet their obligations.