



**Agreement on the Conservation of Albatrosses and Petrels**

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**Illegal, Unreported and Unregulated (IUU) fishing and its relevance to ACAP and seabird conservation**

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**Submitted by: Australia**

### **Background**

In this paper, the term "IUU fishing" has the same meaning as in the United Nations Food and Agricultural Organisation International Plan of Action to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing 2001 (IPOA-IUU).

IUU fishing is a serious and global concern. IUU fishing undermines efforts to conserve and manage fish stocks, and has significant adverse impacts on other marine species, including seabirds. The impacts on other marine species include direct impacts through bycatch – causing injury or death – and indirect impacts through overfishing of species which may be prey species, or which are closely related to prey species.

IUU fishing occurs globally, in the exclusive economic zones (EEZs) of coastal States and on the high seas. IUU fishers use the full range of fishing methods used by legal fishers, including several which are known to capture and kill seabirds; for example, pelagic and demersal longlining, mid-water and demersal trawling, and gill-netting.

### **Level and nature of global IUU fishing**

Because of its nature, it is very difficult to obtain accurate information about global IUU fishing. There has been one attempt<sup>1</sup> at a global assessment of the size and spatial distribution of IUU fishing, albeit that this report largely excludes the "unreported" component of IUU fishing. Such global assessments are rare, largely because of the difficulty of obtaining accurate data. While some countries and regional fisheries management organisations (RFMOs) have, or are developing, some ability to assess IUU fishing, the availability of country and regional information remains patchy and difficult to compare or consolidate. Typically, most quantitative information also involves subjective assumptions or estimates that are difficult or impossible to verify. However, there is growing interest in the analysis of global IUU fishing and the amount of information can be expected to slowly increase.

Having noted that information on global IUU fishing is scarce and potentially of poor quality, the following information is provided for illustrative purposes only and to stimulate consideration by ACAP, rather than being absolute or comprehensive.

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<sup>1</sup> MRAG and the Fisheries Ecosystems Restoration Research, Fisheries Centre, University of British Columbia. The Global Extent of Illegal Fishing, April 2008.

- One estimate<sup>2</sup> is that unreported catch, as a proportion of global total reported catch, comprises 25-30%. Another estimate<sup>3</sup> for sub-Saharan Africa of IUU catch as a proportion of total catch was 19%.
- In 2002, the FAO<sup>4</sup> estimated that the total catch from marine capture fisheries was about 84 million tonnes.
- Using the 19% estimate as a guide, suggests that IUU catch in 2002 was about 16 million tonnes, although, for various reasons, this is likely to be an over-estimate. Another report<sup>5</sup> suggests worldwide IUU losses at between 11.06 and 25.91 million tonnes. Clearly, IUU catches are very significant.
- In terms of value, the FAO reported in 2002 that the first-sale value of fisheries was about US\$78 billion, of which 64% was from capture fisheries. Using the 19% estimate, suggests a value for IUU catch of US\$9.5 billion; although this was thought likely to be an over-estimate. Other value estimates include between US\$10-23 billion<sup>6</sup>, the European Commission (2007) US\$15 billion and Pauly *et al* (2002)<sup>7</sup> US\$25 billion. While these estimates are, to varying degrees, somewhat speculative, the value of IUU catches is clearly very large.
- IUU catch of tunas and billfish has been estimated as follows:
  - ICCAT estimated that IUU catches are relatively small, comprising 1-5% of reported catches in 2004, depending on the species of tuna involved, and this equates to 5,000 to 10,000 tonnes;
  - IOTC estimated unreported catches to be about 10% of total reported catches, or about 130,000 tonnes;
  - CCSBT estimated unreported catches to be about 33% and thought that this may have decreased to 10% following Taiwan's joining the Commission. However, more recently, information has come to light that Japan under-reported 100,000t (US\$6 billion) of SBT over the past 20 years<sup>8</sup>; and
  - Greenpeace has estimated that IUU catches in the Pacific range between 100,000 to 300,000 tonnes, based on an assumption that IUU comprises 5 - 15% of reported catches.
- At CCAMLR XXVI in 2007, the total potential seabird mortality in the Convention Area from IUU fishing was estimated at 8,212 seabirds (95% confidence interval range of 6,730 – 21,926), a significant increase over the 4,583 estimate for 2006. IUU fishing catches were estimated at 3,615 tonnes, up from

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<sup>2</sup> Pauly, D and J. Mclean, 2003. In a perfect ocean. Island Press

<sup>3</sup> Marine Resources Assessment Group Ltd, 2005. Review of the impacts of IUU fishing on developing countries. Report prepared for the UK Department of International Development.

<sup>4</sup> FAO, 2002. State of World Fisheries and Aquaculture (SOFIA), 2002. FAO, Rome.

<sup>5</sup> MRAG and the Fisheries Ecosystems Restoration Research, Fisheries Centre, University of British Columbia. The Global Extent of Illegal Fishing, April 2008.

<sup>6</sup> Ibid.

<sup>7</sup> Pauly, D., Christensen, V., Guénette, S., Pitcher, T.J., Sumaila, U.R., Walters, C.J., Watson, R. and Zeller, D. (2002). Towards sustainability in world fisheries. Nature 418: 689-695.

<sup>8</sup> CCSBT (2007). Report of the Fourteenth Annual Meeting of the Commission, 16-19 October 2007, Canberra, Australia.

the 2006 estimate of 3,000 tonnes. Since 1996 the estimated total seabird mortality was 193,927 (95% confidence interval range of 157,917 – 565,245). Of this number:

- 43,396 (95% CI 35,127 – 136,275) were estimated to be albatrosses, including individuals of four species that are IUCN listed threatened;
  - 7,687 (95% CI 6,280 – 21,474) were estimated to be giant-petrels including one globally threatened species; and
  - 121,651 (95% CI 99,213 – 347,589) were estimated to be white-chinned petrels, a globally threatened species.
- A recent study of shark fin trade in Hong Kong estimated that IUU catch of sharks comprise 3 to 5 times that of catches reported to the FAO, 1.1 to 1.9 million tonnes per year<sup>9</sup>.

## Summary

The available information on IUU fishing leads to the following conclusions:

- that it remains difficult to accurately estimate the level and spatial distribution of global IUU fishing, although better information is becoming available and there is value in keeping the issue under periodic review;
- that, notwithstanding the scarcity and quality of information about global IUU fishing, global IUU catch comprises a very significant proportion of total global catch. In other words, reported catch and effort levels are a significant understatement of total catch and effort and, thus, seabird bycatch also;
- that, assuming that IUU fishers do not use mitigation measures to minimise seabird bycatch, the adverse impact of global IUU fishing on seabirds listed under Annex 1 of ACAP is likely to be very significant, potentially of the order of one to several hundred thousands of seabirds killed per annum; and
- that, while it is not the role of ACAP to take actions to directly combat IUU fishing, ACAP can and should seek to influence regional and global organisations and States, including those party to ACAP, to take such actions in respect of IUU fishing on the high seas and within EEZs;

## Recommendations

It is recommended that the ACAP Advisory Committee **agree** that, in respect of both high seas areas and EEZs, ACAP should, as part of its regular interactions with regional and global organisations and States, including those party to ACAP

- **highlight** the likely severity of threats posed by IUU fishing to seabird populations, including of those species listed under Annex 1 of ACAP;
- **encourage** strong and urgent actions to combat IUU fishing;

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<sup>9</sup> Shelley C. Clarke, Murdoch K. McAllister, E. J. Milner-Gulland, G. P. Kirkwood, Catherine G. J. Michielsens, David J. Agnew, Ellen K. Pikitch, Hideki Nakano, Mahmood S. Shivji (2006). Global estimates of shark catches using trade records from commercial markets. *Ecology Letters* 9 (10), 1115-1126.

- **encourage** the preparation of regular estimates of the level and nature, including distribution, of IUU fishing and regular assessments of its impact on seabirds; and
- **request** that such estimates be provided promptly to the ACAP Secretariat for use by ACAP in its work.

Additionally, it is recommended that the Advisory Committee periodically review information on the level and spatial distribution of global IUU fishing in order to assess the impact of IUU fishing on albatrosses and petrels listed under ACAP Annex 1.