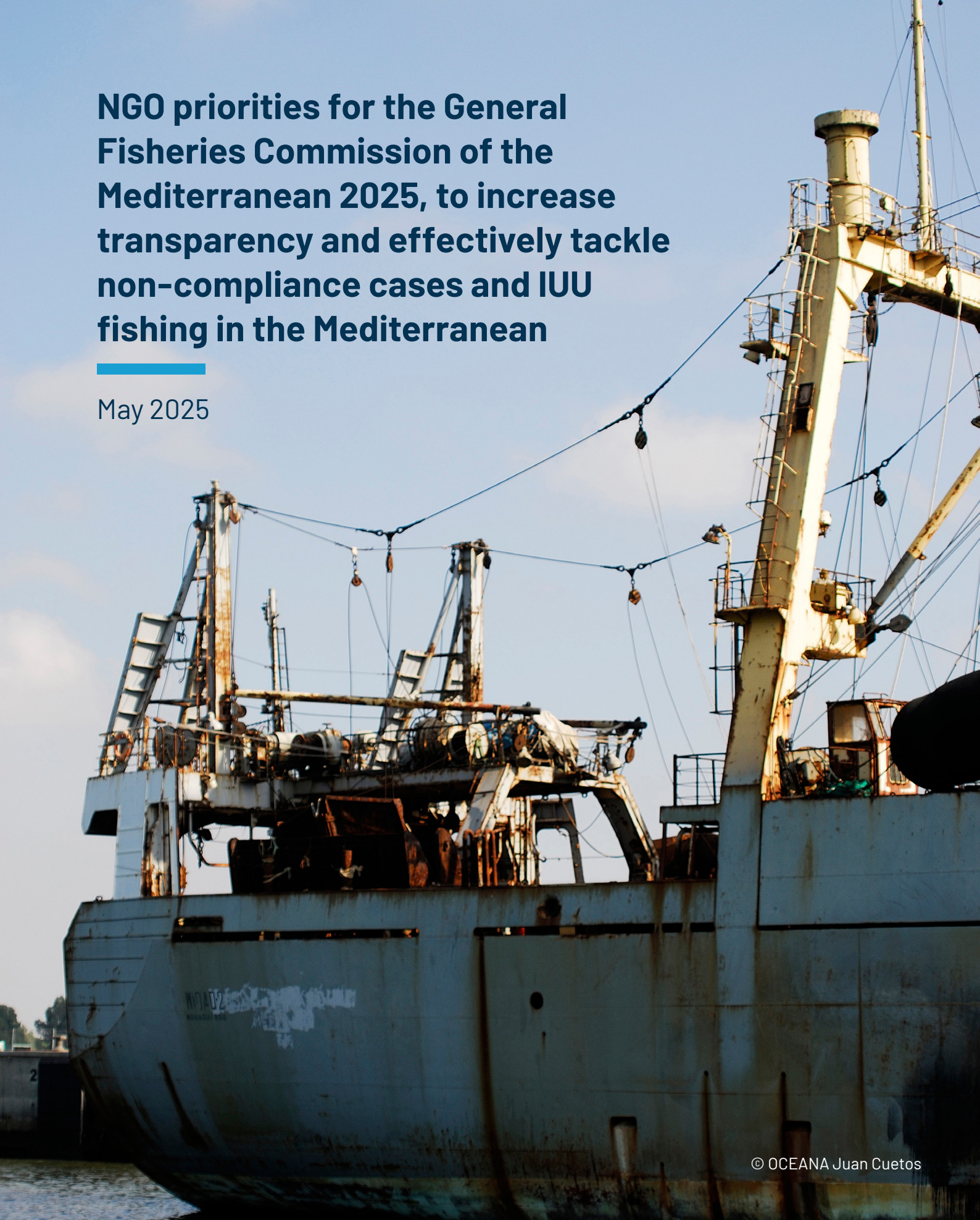


NGO priorities for the General Fisheries Commission of the Mediterranean 2025, to increase transparency and effectively tackle non-compliance cases and IUU fishing in the Mediterranean

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PRIORITIES FOR GFCM IN 2025

In 2023 the GFCM agreed to put in place a compliance mechanism, which will allow GFCM members to take action against non-compliance with GFCM rules. This compliance mechanism will go into force at the Compliance Committee this November. We call on the GFCM CPCs to tackle cases of non-compliance with existing GFCM obligations, and to act on evidence of such activities with deterrent sanctions. This is a prerequisite for ensuring the survival of the Mediterranean's unique biodiversity and the communities that rely on marine resources. 2025 is also the year to kick-start discussions on a new declaration following the 2017 Medfish4ever declaration.

Ahead of the GFCM Working Group on Monitoring and Control Measures (WG MCM) meeting in May, AZIR, ClientEarth, Oceana, The Nature Conservancy and WWF, who work together to protect the Mediterranean Sea against the impacts of illegal, unreported and unregulated (IUU) fishing, would like to share with you our priorities. We ask the GFCM to take ambitious measures to tackle IUU fishing, including the proper implementation of and compliance with GFCM recommendations as this is crucial to rebuild fish stocks in the Mediterranean and Black Seas to sustainable levels, as 58% of Mediterranean fish populations remain subject to overfishing. Thus, we call the GFCM Contracting Parties (CPCs) to:

1. Strengthen the mandate of the CoC to tackle IUU fishing by proposing the adoption of a permanent scheme to assess compliance, and by proposing the adoption of category B and C non-compliance follow-up measures to complete the compliance mechanism.

We welcome the progress made in the 46th and 47th GFCM sessions on strengthening the CoC's ability to address persistent non-compliance. However, further steps from CPCs are needed to ensure the new compliance framework effectively combats IUU fishing:

a. Strengthening CoC functioning

The CoC and related GFCM processes must improve to ensure effective enforcement of compliance actions. This requires CoC reform, incorporating best practices from other multilateral agreements (e.g., International Commission for the Conservation of Atlantic Tuna - ICCAT) and other expert recommendations^[1] The GFCM Secretariat's role should be reinforced to follow up on IUU fishing cases. Additionally, non-governmental organizations should be explicitly allowed to submit non-compliance reports for official CoC consideration.

b. Advancing compliance assessment

At the 17th GFCM Compliance Committee meeting, it was clear that CPCs must prioritise completing compliance tables to enable full implementation of the compliance mechanism by the 18th CoC in 2025, as per Recommendation GFCM/46/2023/22. CPCs should collaborate with the GFCM Secretariat to finalize the second pilot phase ahead of this deadline. Compliance assessments should focus on implementation and enforcement rather than just transposition. After the 2024 pilot phase, in 2025 CPCs should establish a permanent compliance assessment mechanism using compliance tables and reports to the GFCM Annual Meeting.

c. Completing the compliance mechanism

The CoC should advise the GFCM Commission to finalize the compliance mechanism by adding measures for non-compliance categories B (reporting requirements) and C (monitoring, control, and surveillance) to Annex III of Recommendation GFCM/46/2023/22. Additionally, GFCM should consider trade-restrictive measures as a corrective measure, as seen in ICCAT Recommendation 06-13. As the compliance mechanism takes effect in 2025, corrective measures must be applied when non-compliance is identified.

2. Strengthen vessel monitoring through a new Recommendation on the establishment of a regional Vessel Monitoring System (VMS).

GFCM remains one of only a few RFMOs without a regional Vessel Monitoring System (VMS) or mandatory data sharing between flag and coastal States. This gap creates inefficiencies and hinders monitoring vessels operating in multiple jurisdictions, potentially enabling IUU fishing.

With pilot projects running on centralised and decentralised VMS under Resolution GFCM/44/2021/8, we look forward to their conclusion and the final report. In 2025, we urge the adoption of a new Recommendation to establish a secured regional VMS that allows for centralised data sharing for control and investigation efforts, like the joint inspection schemes (JIS).

In addition, the VMS must be urgently installed on all vessels over 15 metres to effectively track fishing activity and tackle illegal trawling as required for all CPCs since 2012. Furthermore, the GFCM should take steps to require the use of automatic identification systems (AIS) for all fishing vessels above 15 metres by 2030 to improve vessel safety and complement vessel monitoring.



3. Update Resolution GFCM/44/2021/6 to mandate IMO numbers for all eligible vessels over 15 meters, including wooden ones, and include this data in the GFCM AVL. Upgrade this requirement to a binding Recommendation, aligning with other RFMOs.

The GFCM should update Resolution GFCM/44/2021/6 to mandate IMO numbers for all eligible vessels over 15 meters, including wooden ones, and ensure their inclusion in the GFCM Authorised Vessel List (AVL). This requirement should also be upgraded to a binding Recommendation, aligning with best practices from other RFMOs.

Currently, the Resolution applies only to vessels over 20 meters (excluding wooden ones) and remains non-mandatory, falling short of IMO Assembly Resolution A.1117(30), which calls for IMO numbers on all motorized fishing vessels over 12 meters.

To strengthen vessel traceability across CPCs, on a first step, GFCM should require IMO numbers for all vessels over 15 meters, including wooden-hulled ones, as already mandated for the EU fleet. In a second phase, this should extend to all vessels over 12 meters, fully aligning with IMO criteria and best practice from other RFMOs (See table in Appendix I).

Furthermore, this initiative has been supported by the Mediterranean Advisory Council, who has [issued an advice](#) to the European Commission on this regard.

4. Amend Recommendation GFCM/45/2022/17 concerning the establishment of a GFCM Record of Vessels over 15 metres authorised to operate in the GFCM Area to further strengthen the GFCM AVL and make it more complete, transparent and functional.

The MSA welcomed the addition to the GFCM AVL of information related to vessels that are authorised to fish inside *specific* fishing restricted areas (FRAs) in 2021; however, the requirement for this information to be made public should be extended to *all* FRAs.

Moreover, to increase effective transparency and bring GFCM requirements in line with the best practices of other RFMOs (see table Appendix II), the following information should be included in the GFCM AVL: *Previous flag state and previous owner; the beneficial owner.*

In addition, the following information should be made public (currently restricted to CPCs) as per other RFMOs best practice (e.g. in the Indian Ocean Tuna Commission (IOTC) and Convention for the Conservation of Antarctic Marine Living Resources (CCAMLR)): *Owner's address, city, zip code and country, including information on the beneficial owner; Operator's address, city, zip code and country.*

A comprehensive, publicly accessible AVL with beneficial ownership details (such as who can fish where, when, and what, as well as who benefits from such activities) will remove the current veil of secrecy and enhance accountability, support enforcement, and eliminate ambiguity over vessel activities and beneficiaries.

5. Establish a GFCM Working Group on at-sea monitoring

At-sea monitoring is an essential component of effective fisheries management, improving data collection for scientific and compliance purposes on target and non-target catch and verifying that national and regional management measures are working.

At-sea monitoring tools, including human observers, electronic monitoring (also known as remote electronic monitoring – REM) and electronic reporting are currently being discussed, trialled and deployed in other RFMOs, including ICCAT, IOTC, Western and Central Pacific Fisheries Commission (WCPFC), Inter-American Tropical Tuna Commission (IATTC) and South Pacific Regional Fisheries Management Organisation (SPRFMO).

The lack of observation and monitoring programmes in GFCM has been highlighted in Recommendation 44/2021/14, as being a key barrier to understanding and mitigating the serious impact of fishing on sea turtles in the Mediterranean for example. GFMC47 also highlighted that it is time for the Commission to focus on member's compliance with the measures agreed to continue to address overfishing and the significant incidental catch and associated mortalities on the broader ecosystem.

We recommend a dedicated discussion how at-sea monitoring tools could be used to harmonise data collection across the region and support GFCM management plans through a new or existing Working Group.



6. Enhance Conservation and Management Measures (CMM) implementation and compliance through simplification of the CMM database and transparency on control efforts.

To improve compliance by CPCs, the CMM database should be simplified, and control efforts made public. The Secretariat should consolidate CMMs and amendments into a single text, as the current fragmented system leads to misunderstandings and poor implementation. A complete, organized compendium of active CMMs per topic should be maintained.

Following best practices from other Regional Fisheries Management Organisations (RFMOs) like the Northwest Atlantic Fisheries Organisation (NAFO), CPCs' implementation of GFCM measures should be transparent. A publicly accessible table should track infringements, follow-ups, and outcomes (e.g., NAFO's [Table 4.2](#) from its 45th Annual Meeting). Despite CPCs reporting through the Compliance Assessment Scheme, no compliance reports or summaries are published on the GFCM website.

We urge CPCs to provide the CoC Secretariat with aggregated MCS activities from the previous year, enabling the publication of infringement details from Joint Inspection Schemes (JIS), including vessel inspections, identified issues, and outcomes.



APPENDIX I

Compilation of IMO number requirements in the RFMOs.

RFMO	REQUIREMENT OF IMO NUMBER	FOLLOW 2017 IMO ASSEMBLY RESOLUTION A.1117(30)	LINK
ICCAT	20 m	NO	RECOMMENDATION 21-14 BY ICCAT AMENDING RECOMMENDATION 13-13 CONCERNING THE ESTABLISHMENT OF AN ICCAT RECORD OF VESSELS 20 METRES IN LENGTH OVERALL OR GREATER AUTHORIZED TO OPERATE IN THE CONVENTION AREA
IOTC	12 m	YES	RESOLUTION 19/04 CONCERNING THE IOTC RECORD OF VESSELS AUTHORISED TO OPERATE IN THE IOTC AREA OF COMPETENCE
WCPFC	12 m	YES	CMM 2018-06 - CONSERVATION AND MANAGEMENT MEASURE ON THE RECORD OF FISHING VESSELS AND AUTHORIZATION TO FISH
IATTC	12m	YES	RESOLUTION (AMENDED) ON A REGIONAL VESSEL REGISTER
CCSBT	12 m	YES	RESOLUTION ON A CCSBT RECORD OF VESSELS AUTHORISED TO FISH FOR SOUTHERN BLUEFIN TUNA
NEAFC	12 m	YES	NEAFC SCHEME OF CONTROL AND ENFORCEMENT
NAFO	12 m	YES	NAFO CONSERVATION AND ENFORCEMENT MEASURES 2023
SEAFO	> 100GT	NO	SYSTEM OF OBSERVATION, INSPECTION NAFO CONSERVATION AND ENFORCEMENT MEASURES 2023, COMPLIANCE AND ENFORCEMENT (2019)
SIOFA	12 m	YES	CONSERVATION AND MANAGEMENT MEASURE FOR VESSEL AUTHORISATION AND NOTIFICATION TO FISH (VESSEL AUTHORISATION)
SPRFMO	12 m	YES	CMM 05-2022 CONSERVATION AND MANAGEMENT MEASURE FOR THE ESTABLISHMENT OF THE COMMISSION RECORD OF VESSELS AUTHORISED TO FISH IN THE CONVENTION AREA
CCAMLR	12 m	YES	CONSERVATION MEASURE 10-02 (2022)

GFCM	20 m	NO	(NON-BINDING) RESOLUTION GFCM/44/2021/6 ON THE APPLICATION OF AN INTERNATIONAL MARITIME ORGANIZATION NUMBER ON THE APPLICATION OF AN INTERNATIONAL MARITIME ORGANIZATION NUMBER, AMENDING RESOLUTION GFCM/41/2017/6
NPFC	12 m	YES	CONSERVATION AND MANAGEMENT MEASURE ON INFORMATION REQUIREMENTS FOR VESSEL REGISTRATION

APPENDIX II

Compilation of ownership requirements in the RFMOs

RFMO	OWNERSHIP INFORMATION REQUIREMENTS	PUBLIC	LINK
ICCAT	Name and address of owner(s) and operator(s)	YES	RECOMMENDATION 21-14 BY ICCAT AMENDING RECOMMENDATION 13-13 CONCERNING THE ESTABLISHMENT OF AN ICCAT RECORD OF VESSELS 20 METRES IN LENGTH OVERALL OR GREATER AUTHORIZED TO OPERATE IN THE CONVENTION AREA
IOTC	Name and address of owner(s) and operator(s)/ Name and address of beneficial owner(s), if known and different from vessel owner/operator or indicate non-availability/ Name and address of company operating the vessel and company registration number (if any)	YES	RESOLUTION 19/04 CONCERNING THE IOTC RECORD OF VESSELS AUTHORISED TO OPERATE IN THE IOTC AREA OF COMPETENCE
WCPFC	Owner name, address	YES	STANDARDS, SPECIFICATIONS AND PROCEDURES FOR THE WESTERN AND CENTRAL PACIFIC FISHERIES COMMISSION RECORD OF FISHING VESSELS
IATTC	Owner name/country; Operator(s) name/ country	YES	RESOLUTION (AMENDED) ON A REGIONAL VESSEL REGISTER
CCSBT	Name and address of owner(s)/ Name and address of operator(s)	YES	RESOLUTION ON A CCSBT RECORD OF VESSELS AUTHORISED TO FISH FOR SOUTHERN BLUEFIN TUNA
NEAFC	no	/	NEAFC SCHEME OF CONTROL AND ENFORCEMENT
NAFO	Registered owner and address/ Responsible for using the vessel	NO	NAFO CONSERVATION AND ENFORCEMENT MEASURES 2023
SEAFO	Name and address of owner or owners/ name and address of operator (manager) or operators (managers)(if any)	YES	SYSTEM OF OBSERVATION, INSPECTION, COMPLIANCE AND ENFORCEMENT (2019)
SIOFA	Name and address of owner or owners/ name and address of operator (manager) or operators (managers)(if any)	NO	CONSERVATION AND MANAGEMENT MEASURE FOR VESSEL AUTHORISATION AND NOTIFICATION TO FISH (VESSEL AUTHORISATION)

SPRFMO	no	/	PUBLIC VESSEL RECORD
CCAMLR	Name and address of vessel's owner(s), and any beneficial owner(s) if known; (vii) name and address of licence owner (if different from vessel owner(s))	YES	CONSERVATION MEASURE 10-02 (2022)
GFCM	Owner (name and address)/ Operator (name and address)	NO	GFCM/45/2022/17
NPFC	no	/	MEMBER/CNCP FLAGGED VESSELS REGISTER

^[1] Such as the toolkit developed by a group of international experts to provide RFMOs with approaches and guidance to strengthen and effectively implement processes to review and improve member compliance (Pew (2023) *How Regional Fisheries Management Organizations Can Strengthen Compliance Processes*, A toolkit to help improve management for some of the world's most valuable fish stocks, available at <https://www.pewtrusts.org/en/research-and-analysis/fact-sheets/2023/05/how-regional-fisheries-management-organizations-can-strengthen-compliance-processes> (accessed on 19 April 2024)).

