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|  | ***Fiji Fishing Industry Association*** |
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**FOUR YEARS OF ELECTRONIC MONITORING (EM) IN FIJI’S SURFACE LONG LINE FLEET –**

 **WHAT NOW?**

The first phase of the largest, and most comprehensive, EM project in the Pacific has been completed in Fiji. There are seven various EM trials currently underway within the WCPO (including Australia and New Zealand) but none have had the number of vessels or scrutiny as that has been afforded to the FAO/GEF Fiji project.

In 2015 the Fijian Government (GoF) signed a contract with FAO/GEF Common Oceans ABNJ Tuna project to implement a trial of Electronic Monitoring Systems (EMS) on long line vessels in Fiji. The Fiji trial being part of a much larger Common Oceans ABNJ Programme managed by the Food and Agricultural Organisation of the United Nations (FAO). The Fiji Fishing Industry agreed to provide the vessels and the necessary "sea time" as an "in kind" contribution. This Industry contribution represented 9.2% of the total global co-financing of the five-year project. Concurrent with (GoF) signing the FAO contract a Memorandum of Understanding (MOU) was entered into, amongst other things, assuring access, by Industry, to camera footages. This is an **important distinction** as the trial was always seen as having two aims. That is to provide compliance benefits to Government and onboard management benefits to Industry. The five-year programme will cease on the 1st November 2019.

What should happen now is the subject of this paper.

The terminal evaluation of the Fiji trial (still in draft) states; "*Pilot trials of electronic observer systems aboard tuna longline vessels successfully completed in Fiji with lessons learned and best practices disseminated to sub regional* *organisations and T-RFMOs for upscaling”.*

Under the Fiji pilot trials 51 long line vessels were fitted with cameras and an analysis group established within the Ministry of Fisheries MoF. This group was tasked with reviewing 100% of the camera footage. One vessel was lost during the trial period, but 50 **vessels are fully fitted out with cameras and associated equipment. The MoF analytical unit and project management team remain intact.**

In an in-depth report, prepared by MRAG Asia Pacific, entitled “Building a Business case for Electronic Monitoring (EM) for the Fiji long line (LL) fishing industry” (MRAG Business Case) the results of the Fiji trial are reviewed. As the title suggests it provides options for the business case going forward. This includes proposals for the joint financing of ongoing costs by Government and Industry. The proportionality of these costs between Government and Industry are also discussed. None of the various options have been adopted so far and a hiatus exists. This uncertain position is further compounded by the MoF currently withholding access to footage pending higher Governmental approval. The primary **commercial** reason for Industry involvement in the trials is negated until a decision on this issue is made.

Information from Australia is that companies get access to this information on a regular basis. It is essential for industry in moving forward with EM, that this trip footage be supplied to the Fijian industry so that they can improve on board processes and safety at sea.

A similar trial under the FAO/GEF Common Oceans project was conducted on Purse Seine vessels in Ghana . As with the Fiji project the trial was considered as a precursor to upscaling by relative t-RFMO’s.

The Western Central Pacific Fisheries Commission (WCPFC) is yet to determine when and how EM will be incorporated within their Monitoring, Control and Surveillance (MCS) systems. It is understood that implementation of EM by WCPFC in their (MCS) is at least three years away.

Electronic Monitoring does not come cheaply but if made compulsory would provide, together with physical observers, 100% observer coverage. (However, what 100% actually means and how much of the footage would need to be reviewed has to be established and the costing fully understood.) This, we understand, to be the ultimate aim of the WCPFC. The various (MRAG Business Case) models build upon Fiji’s already high physical observer coverage of 20% and an effective 80% EM surveillance. The actual observer coverage required by WCPFC currently is only 5% and some member nations are not meeting even this target.

The parlous fiscal state of the surface long line fishery in the South Pacific is well known. Consequently, the Fiji domestic long line industry is not sufficiently robust to accept in total the additional costs needed to continue the existing EM programme. Put simply, it is cheaper to pay for 100% physical observers, than to meet the estimated costs of continuing the existing program. Whilst there are savings in cost (vice physical observers) in Australia and New Zealand this is not so in PIC’s where labour rates are considerably cheaper. Nevertheless, it must be accepted that the Fiji pilot project is undoubtably the best and most valuable precursor to rolling out Electronic Monitoring Systems (EMS) in the WCPFC. The value of at sea experience by commercial operators cannot be underestimated in determining the way forward in establishing any compulsory (EM) protocol.

We have quite deliberately described the FAO/GEF project as the “first phase”. This is because the preliminary work necessary for final implementation of (EM) within Fiji - let alone a WCPFC roll out is not complete.

Furthermore, it is not suggested that the “Fiji model” is perfect and there is more work to do.

The position of the Fiji Fishing Industry Association (FFIA) is that;

1. the current programme should continue until the WCPFC decide on the modus operandi of their preferred EM protocol.
2. the programme should be subject to modification and change within the period to comply with likely WCPFC requirements and recommendations.
3. Prompt access to camera footage made available to owners.
4. Funding be secured so that an unfair fiscal burden is not placed on the Fiji Industry.

It is necessary to explain the rationale of the FFIA’s position and to do this it is best to describe the actual “at sea” events of the past four years of EM in Fiji

1. **Acceptance of EM onboard vessels**. It would be fair to say that the EM project was more welcomed by vessel owners than the crews themselves. Incidents of damage to equipment or screening of cameras occurred on some vessels more than others. Long Line vessels are comparatively small and there are limited private spaces. Cameras were seen to be an invasion of privacy by the crew whereas owners welcomed the extra surveillance both for quality management purposes but also for the control of theft or mishandling of fish. The addition of a bridge monitor allowing the Captain to view deck operations was welcomed. Co-operation of crews and owners is essential, and it is doubtful if a blunt “compulsion” regime will ever work in WCPO where voyages of two or three months are often the norm.
2. **System employed**. The Spanish “Satlink” technology is being used. Comparisons cannot be offered between this system and those of Archipelago, (Canada), Saltwater (USA) and Trident (NZ). One FFIA member installed a Trident system but this was discontinued with the advent of the FAO/GEF project. EM continues to evolve, and all systems are constantly improving. Anecdotally there appears to be little advantage of one system against another. The relative robustness of the systems is unknown. The apparent lifespan of some of the component parts of the “Satlink” technology appears to be four or five years. Some replacements have been made within the trial period.
3. **System Support**. “Satlink” have established an office/workshop in Suva. This is manned by two expatriate staff and one local who have provided prompt and efficient service. Onsite support is more important than the advantages of one system against another. This is particularly so in the Pacific where maintenance and service availability is crucial. We support the continuation of “Satlink “but the relative high costs have to be addressed. For example, the local charges to certify the MTU for FFA re-registration of VMS is FD150 whereas the “Satlink” equivalent charge is USD250.The charge for Satlink is further compounded by a 15% withholding tax on payment for services paid overseas. This is non recoverable. “Satlink” need to establish a local company within Fiji so that clients can avoid the 15% surcharge .
4. **Access to Footage**. Prompt Industry access to footage is essential and will be even more so at time of WCPFC implementation. This is no way interferes with the compliance role of EM and this is often misunderstood. The sinology equipment and additional Network Addtion Storage (NAS) is already held in Fiji to enable access to EMS for members. The MoF is waiting legal advice from the Solicitor General’s Office before footage will be released. Hopefully this will be settled in short order.
5. **Penalty regime where EM data is used.** This has not been invoked over the period of the trial, but it is assumed it will eventually fall under the fixed penalty provisions of the Fiji OFMR (2014)
6. **Onsite project management.** This has been led by the ABNJ – national TP Coordinator Mr Netani Tavaga and a good cooperative relationship exists. The service charges by the MoF for analysis and other management will ultimately form part of the EM costs. These must be comparable to other similar projects as to number of staff employed and open for review.
7. **Supplementary information for owners.** The GPS and other technology contained within the EMS allows for VMS, data transmission and live vessel tracking to be provided in addition, and separate from, the camera monitoring role of EM. During the trial some owners paid for this option. The use of EMS to provide this facility will assist in the acceptance of EM.

 In summary the FFIA supports the continuation of the Fiji EM pilot scheme until adoption of WCPFC EM protocols. We believe that, with WCPFC/FFA input and modifications, it could be the model adopted as the MCS EM tool for Long Line fishing. Furthermore, the model will be tested in practice prior to implementation by WCPFC. Clearly under this scenario it is unreasonable to expect Fiji to absorb the full cost of the continuing pilot scheme.

**Fiji Fishing Industry Association**

**Suva**

**Fiji**

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