

HIGHLY MIGRATORY SPECIES ADVISORY SUBPANEL REPORT ON  
THE NATIONAL MARINE FISHERIES SERVICE REPORT

The Highly Migratory Species Advisory Subpanel (HMSAS) offers the following comments on Agenda Item J.1 – National Marine Fisheries Service Report.

**Updates on Inter-American Tropical Tuna Commission (IATTC) Regional Vessel Register (RVR) Regulations**

We note the final rule has yet to be published, so we base our comments on the Proposed Rule (published in April of this year – [84 C.F.R. 15556](#)).

Regarding the necessity for an International Maritime Organization (IMO) number: The proposed rule notes a “wide recognition that IMOs can be useful in helping combat illegal, unreported, and unregulated (IUU) fishing.” The HMSAS supports any international efforts which result in reducing IUU fishing provided these are applied to, and enforced against, ALL fleets fishing on the high seas in the Convention Area. We do have some concern about the effective date of the requirement, January 1, 2020. Some of the information necessary to request an IMO number will take time to obtain and may result in some vessels being unable to obtain the IMO number before the effective date. Attached, as an Appendix, is a screenshot of the form taken earlier this year to request an IMO number.

Regarding amendments to existing regulations related to the IATTC RVR for purse seine vessels fishing in the Eastern Pacific Ocean, the HMSAS generally supports the proposed rule’s language with one possible exception. We have concerns about how the proposed frivolous request rules could be applied to small purse seine vessels. The frivolous request rules are designed to ensure that purse seine vessels on the RVR are actively participating in the fishery. The proposed rule will “treat as frivolous any request by a small coastal purse seine vessel for active status if that vessel did not make at least one landing of tuna caught in the Convention Area in the calendar year prior to the request.” We are concerned that a strict landing requirement could have unintended consequences, especially in those years where tunas are not readily available to our small coastal purse seine vessels.

**Proposed Regulations on Fish Aggregating Devices (FADs), Silky Shark Retention, and Observer Safety**

The HMSAS supports these proposed regulations.

PFMC  
11/17/19

## Appendix



# REQUEST FOR IMO SHIP IDENTIFICATION NUMBER

**IHS Maritime & Trade**  
 Sentinel House, 163 Brighton Road  
 Coulsdon, Surrey CR5 2YH  
 United Kingdom  
 Tel: +44 01334 328300  
 Email: ship.imo@ihs.com

**TO ENABLE UNIQUE IDENTIFICATION OF SHIPS FOR ASSIGNMENT OF AN IMO NUMBER IN ACCORDANCE WITH IMO RESOLUTION A.1078 (28), SOLAS XI I/3 and I/5, PLEASE COMPLETE THE FOLLOWING DETAILS IN CAPITALS:-**

*Note: Shipbuilding details are essential to issue an IMO Ship Number for Newbuildings prior to completion*

Current Ship Name / Shipyard ID*			
Former Name(s)			
Original Name*			
Flag*	Port of Registry†	Call Sign†	
MMSI†	Official Number†	Flag Registration Date‡	
Tonnage (69)	<input type="checkbox"/> Yes <input type="checkbox"/> No	Fishing No.+	
Gross*		Net*	Deadweight
Length Overall*		Length B.P.	Beam*
Moulded Depth*		Draught	
Keel Laying Date‡		Launch Date‡	Completion Date*‡
Shipbuilder*		Shipbuilder Hull Number*	
Sub-Contractor Hull		Sub-Contractor Hull Number	
Place of Build*		Hull Material*	
Ship Type		Fishing Vessel Gear-type^	
<b>MARPOL requirements for Oil Tankers</b>	The ship complies with regulation 13F(3) (double-hull)		<input type="checkbox"/> Yes <input type="checkbox"/> No
	The ship complies with regulations 13 and 13E (SBT/PL)		<input type="checkbox"/> Yes <input type="checkbox"/> No
	Other (please specify)		
	The ship is subject to CAS requirements of regulation		<input type="checkbox"/> Yes <input type="checkbox"/> No
Registered Owner† & Address† (Including Fax, Telephone & Email)		Manager† & Address† (Including Fax, Telephone, Email & Website)	
<input type="text"/>		<input type="text"/>	
<input type="text"/>		<input type="text"/>	
<input type="text"/>		<input type="text"/>	
<input type="text"/>		<input type="text"/>	
Number of Main Engines*	Manufacturer*	Engine Model*	
Current Class Society*		kW of Each Engine	Number of Propellers
<b>COMPANY REQUESTING IMO NUMBER</b>			
Company Name*			
Contact Name*	Sender's Email*		

[\* Required Fields – all ships]  
 [+ Distinctive Number / Letters for Fishing Vessels]

[† Required Fields – Ships in service only]  
 [‡ Date format is YYYY-MM-DD]

[^ Required Fields – Fishing Vessels only]