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International Fisheries Division
Office for International Affairs and Seafood Inspection
NOAA Fisheries
1315 East-West Highway, Silver Spring, MD 20910

Attention: Melissa Beaudry

Re: NOAA-NMFS-2014-0090 (RIN 0648-XE553) Presidential Task Force on Combatting Illegal, Unreported and Unregulated (IUU) Fishing and Seafood Fraud Action Plan for Implementing Recommendations 14/15; Commerce Trusted Trader Program

Dear National Ocean Council (NOC) Committee on IUU Fishing and Seafood Fraud:

The World Wildlife Fund (WWF) thanks you for the opportunity to submit comments on the proposed Commerce Trusted Trader Program, herein referred to as the Trusted Trader Program. The Trusted Trader Program concept is fundamental to the success of the proposed Seafood Import Monitoring and Traceability Program. A successful Trusted Trader Program will help enable robust risk-based implementation of the final Traceability rule by ensuring the rule offers positive incentives and not only disincentives, and will provide clarity on the traceability processes and procedures needed to help facilitate trade.

WWF believes that the Trusted Trader Program must not be treated as an afterthought but rather as a core element of how the new Regulation works in practice. To be effective, the Trusted Trader Program then must set a bar that is high and achievable, based on clear and transparent criteria that ensure a "Trusted Trader" is truly trustworthy and accountable, and where the information provided can be independently verified. The Trusted Trader Program should reward the best practices for legal sourcing and traceability of products and ideally create conditions that also reward sustainable sourcing of products from market actors.

Ultimately, the final rule must be strong to incentivize participation in a Trusted Trader Program. The Trusted Trader Program will become meaningless if a strong verification system is not in place for the final rule because it will be too easy for supply chain actors to commit fraud and mislabel their product, particularly with only some species covered and not all. To incentivize participation in the Program and catalyze change, both the benefits for easier access to the market must be high and the threat of detection and penalties for not complying with the Regulations must be high.

SCOPE OF THE PROGRAM

WWF believes that, despite the name, the focus of the Trusted Trader Program must be on entire supply chains rather than single traders or entities. Criteria for Trusted Trader qualification must cover all critical points along the supply chain, from fishing activities through to importation, to ensure the verifiability of basic catch information required under the new rule as well as the verifiability of chain of custody and product identity as the product moves to the market.

The National Ocean Council (NOC) should give careful consideration to the nature of the entities or systems that may qualify for “Trusted Trader” status, to require that the status applies to entities other than just the importers of record, including the harvester, wholesaler, processor, exporter and all actors in the supply chain. One approach might be to allow various entities/systems to qualify as “trusted links”, such that any importer of record/permit holder sourcing from a supply chain consisting entirely of such “trusted links” would qualify for Trusted Trader status. This is similar to the approach used in the Marine Stewardship Council’s Chain-of-Custody certification.¹

CRITERIA FOR QUALIFYING AS TRUSTED TRADER

The criteria for becoming a Trusted Trader must be rigorous but flexible, offering multiple options for ways to qualify. There cannot be a “one size fits all” approach, but rather the criteria should offer a “tool box” approach. As the NOC Committee proposes, an applicant should have a history of compliance with all applicable conservation, management, and supply chain laws governing the product. WWF also believes that the Trusted Trader criteria will need to take into account both regulatory and private sector dimensions when evaluating whether a supply chain and importer qualify for Trusted Trader status. In some unusual cases—such as direct importation from a fishery governed by a regulatory system that demonstrably meets the highest standards of transparent and sustainable fisheries management (those jurisdictions with management systems equal to or better than the U.S.)—qualification for Trusted Trader status could conceivably be based on the regulatory context alone. Evaluating whether the regulatory context is sufficient to qualify as a Trusted Trader could be based on whether strong management measures exist in a jurisdiction, including but not limited to, whether:

- All vessels operating are licensed and registered;
- Vessels have vessel monitoring systems onboard;
- Scientific assessments exist for all fisheries;
- Scientifically-based quotas or total allowable catch;
- Enforcement capacity and resources.

In other cases—such as products covered by a private certification system meeting the highest global standards and demonstrably capable of ensuring both the validity of underlying information and product traceability—qualification for Trusted Trader status could conceivably be based on the private sector system alone. In most cases, Trusted Trader criteria will need to look at both the regulatory and the private sector dimensions to evaluate a supply chain and importer. But in all cases, Trusted Trader criteria should require the following minimum elements of trustworthiness.

¹ MSC Chain of Custody Certification Requirements. Version 2.0, February 20, 2015.
<https://www.msc.org/documents/scheme-documents/msc-scheme-requirements/msc-coc-certification-requirements-v2.0/>

Transparency of Underlying Fishing Activity

WWF believes that full transparency of underlying fishing activities, including direct public access to authoritative and verifiable information about vessel registration, licensing of fishing, vessel tracking, compliance records, and basic catch documentation is an essential element of being a Trusted Trader. A Trusted Trader should be collecting the key data elements related to the origin of the catch outlined in the draft rule, and that information should be made fully accessible to the public. This should include but is not limited to:

- Vessel identity and registration;
- Identity of vessel owner/operator (including beneficial owner);
- Location of catch;
- Authorization to fish (permits, licenses, etc.);
- Species and product name;
- Fishing method used;
- Date and time of fishing;
- Location, date, time and specifics of any at sea transfer;
- Transformation of fish prior to landing;
- Location, date, and time of landing;
- Volume landed;
- Person/enterprise with custody and ownership after transfer/landing;
- Other compliance data required (i.e. applicable catch documentation, bycatch reporting requirements, etc.).

In addition to the collection and publication of the key data elements outlined in the draft rule, a Trusted Trader should also collect the following information related to the fishing activity:

- International Maritime Organization (IMO) registration number for the vessel;
- Automatic Identification System (AIS) Maritime Mobile Service Identity (MMSI) number for the vessel;

IMO Number

The unique identifier provided by the IMO establishes a number that stays with a vessel until it is scrapped and never changes, regardless of the ship's owner, country of registration or name. The records based on the IMO number provide an independent audit trail for each vessel, which is continually updated and cross-checked against multiple data sources, ensuring that owners cannot quickly and easily change a vessel's flag or registration data. The absence of unique, and permanent identifying numbers makes it difficult for authorities to identify specific vessels engaged in IUU fishing, and to track misconduct and gather evidence when they suspect unlawful activity. As a result, vessel owners, even those who have been blacklisted for IUU fishing, can circumvent control measures and continue to fish without being traced, and can operate for years with no accurate record of their activities, operating condition, or compliance status. WWF believes that the rules for market access to the U.S. should eventually require IMO numbers for all vessels as a precondition for entry, but at a minimum importers and supply chains seeking to qualify for Trusted Trader status should have them.

AIS

Similarly, tracking vessel movement and activity is one key to ensuring that illegal fishing has not occurred. AIS as a tool provides a way for fishing vessel operators to demonstrate they are fishing legally by consistently using a transponder. As an open source tool, vessel activity can be easily monitored, and allows a vessel to be more trusted in their operations. By requiring an AIS as a criteria for becoming a Trusted Trader, greater transparency will result in greater confidence in the legality of operations and the catch.

There will be a need to evaluate how small scale operators can comply with the criteria to qualify as a Trusted Trader. While some may qualify, in most small scale fisheries in many countries, access is open, unrestricted and in most cases unregulated, with many local fisheries administrations lacking the capability and capacity to manage fisheries on a sustainable basis and where monitoring, control and surveillance (MCS) is virtually non-existent or extremely ineffective. To qualify as a Trusted Trader, a small-scale fishery at a minimum should be able to demonstrate that it is properly licensed, and operating in a regulated fishery with effective MCS measures in place.

Transparency of Underlying Traceability System

WWF also believes that qualification for becoming a Trusted Trader should include the ability to provide direct electronic access to government officials to both the underlying information about vessel registration, licensing of fishing, vessel tracking, compliance records, and basic catch documentation, as well as to the traceability systems itself. Establishing electronic transmission of the data for the full traceability of the imported products and the identity of all participants in the supply chain should be key components of a Trusted Trader Program.

This means all supply chain actors participating in a Trusted Trader Program should employ fully electronic documentation for the transmission of data that comply with all of the traceability record-keeping requirements in the final rule. Furthermore, electronic access to any data should be easily and readily available to government officials. Supply chain actors who seek Trusted Trader status should have the following traceability procedures in place:

- Collection of the catch information for legality;
- Independent verification of the catch information;
- “In-fishery” traceability for when multiple fishing methods are employed in a single trip or where there are at-sea transfers of product;
- Product transformation identification including the use of unique identifiers at each level of the packaging hierarchy – from a lot, to a pallet, to a case, etc.;
- Processes and procedures for segregating and tracking products;
- Accounting for any changes in mass/volume of a product at each stage of processing;
- Electronic transmission of the data;
- Government access to the underlying traceability system.

Stock Status Should Not Be Overexploited or Unknown

The U.S. should not reward businesses that are sourcing unsustainable and poorly managed stocks with preferential treatment. Illegal and unreported fishing places added pressure on overexploited stocks and

can lead to fishery collapse or depletion. Additionally, poorly managed stocks that have not been scientifically assessed may be experiencing levels of fishing pressure that jeopardizes the sustainability of the stock.

WWF believes that supply chains that are importing products that are derived from stocks whose status is overexploited or unknown as reported to the FAO or by the FAO should not be given any preferential treatment and should not be able to qualify for the Trusted Trader Program. If a more current assessment of a stock exists that shows its status is no longer overexploited or unknown per FAO standards then those products and supply chains should be able to qualify as “Trusted Traders” if they have met all of the other criteria outlined.

According to the most recent FAO Status of Stocks², Appendix 1 provides a list of the “at risk” species whose stocks have been assessed as overexploited or unknown. If a supply chain is applying to be a “Trusted Trader” it should not be importing any of these stocks.

Forced Labor Should Not Be Used

WWF believes that any fishing that uses forced or slave labor should be considered illegal. The recent amendment to Section 307 of the Tariff Act of 1930, which eliminated the “consumptive demand” exception of the law, means that any products produced using forced labor are not allowed entry into the U.S. market. All companies should seek to address these concerns by: assessing the extent to which their current supply chains may include goods produced with forced labor (these assessments can be structured in order to prioritize higher-risk products and sourcing locations); developing plans to address any current reliance on goods that may be linked to forced labor; reviewing, and augmenting as necessary, existing prohibitions on the use of forced labor by supply chain actors; evaluating the extent to which these prohibitions are supported by appropriate oversight and monitoring functions; and, engaging appropriate internal stakeholders to ensure that corporate efforts to address forced labor concerns are appropriately resourced.

At a minimum, actors who qualify as “Trusted Traders” should be able to demonstrate sufficient internal protocols to ensure that forced labor is not used in their supply chain. To do this, Program participants should establish processes and maintain records of key data for the following to prevent forced labor from being used in the supply chain:

- Worker manifest at sea;
- Duration of work at sea between returns to port;
- Contract provisions, including hours and conditions of work, payment, and deduction protocols;
- Labor recruitment channels (e.g. government or private, and if private names of the private recruitment agencies/brokers);
- Third-party validator or auditor of worker information;³

² FAO. 2011. Review of the state of world marine fishery resources. FAO Fisheries and Aquaculture Technical Paper 569. Rome. <http://www.fao.org/docrep/015/i2389e/i2389e.pdf>

³ Information collected and evaluated as part of the State Department’s Trafficking in Persons (TIP) report could also be used as a source of information.

- Direct reports from workers before and after they are at sea through confidential interviews and grievance mechanisms that include protections against reprisals.

This information should be updated regularly and available for independent audits on an annual basis. Supply chain actors that are implicated in the use of slave labor should have their “Trusted Trader” status revoked.

Independent Third Party Auditing

One of the keys to ensure that the traceability systems are collecting and transmitting the key data through the supply chain and complying with record-keeping requirements is to have regular comprehensive audits conducted by an approved independent third party.⁴ WWF believes independent third party auditing of the underlying information sources and traceability systems on a regular and on-going basis is a key criteria of being a Trusted Trader.

Thorough external evaluations of a supply chain’s processes and procedures for tracking the legality and integrity of the product are essential to maintaining a secure chain-of-custody. Third party audits provide a credible verification system for the entire chain-of-custody and would help to maintain compliance with the Trusted Trader criteria. The U.S. could establish a system that relies upon certifications from approved independent third party auditors to verify a Trusted Trader’s ongoing compliance with all of the criteria for qualifying for the Program.

BENEFITS AND INCENTIVES

The Trusted Trader Program should reward best practices moving beyond what a strong rule requires. The regulatory consequences of the Trusted Trader mechanism should not relieve Trusted Traders of the basic obligations of the new Regulation, but could allow substantially reduced burdens for the provision of information at the time of importation, and/or substantially reduced exposure to routine inspections, audits, and investigations.

Benefits may include those similar to other Federal import programs, such as the following:

- Records of required information should be maintained but not necessarily reported;
- Expedited entry for products deriving from certified supply chains ;
- Exemptions from routine CBP exams for importer partners;
- Reduced targeting for inspections and reduced risk scores for CBP examination.

The potential program benefits of reduced targeting and inspections and streamlined entry may expedite the flow of trade, reduce the burden of meeting audit requirements for certified IFTP permit holders, and improve implementation of the Seafood Import Monitoring Program and enforcement efficiency. Importers as well as harvesters, processors, and exporters would all benefit from reduced inspections and a streamlined entry process by being able to more quickly move their product to market and by not needing to supply additional information at the time of importation.

⁴ International Standards Organization (ISO) establishes standards for third party auditors. ISO 9001:2015 specifies requirements for a quality management system when an organization needs to demonstrated its ability to consistently provide products and services that meet applicable statutory and regulatory requirements.

EVALUATION AND VERIFICATION OF CERTIFIED PERMITS HOLDERS

Participants in the Trusted Trader program should be required to submit to an annual review of their supply chain traceability and chain of custody procedures, complete with detailed reporting of the supply chain risk-management practices of the entity. Such reporting must include elements such as:

- The results of a third party audit and any corrective action taken to mitigate weaknesses along the supply chain;
- A description of any significant changes in supply-chain activities (i.e. changes in sourcing of product, identity of any new trade partners along the supply chain).

Further, a more in-depth audit of traceability practices should occur once every three years, including onsite visits from NOAA personnel as well as interviews with staff members tasked with overseeing traceability procedures.

Those Trusted Trader participants who can demonstrate they are sourcing sustainably should be given the additional benefit of reduced burdens for permit renewal. Following a successful showing of traceability and chain of custody best practices, as well as proof of sourcing only from sustainable, well managed stocks, the participants should be required to submit information regarding sustainability, supply chain traceability and chain of custody procedures only once every two years, while undergoing an on-site supply-chain audit by government personnel once every five years.

RELATIONSHIP TO OTHER TRUSTED TRADER OR FEDERAL IMPORT PROGRAMS

WWF suggests that the Trusted Trader program promulgated by the Task Force may adopt many of the same procedural requirements and incentives of other “Trusted Trader” or federal import programs being developed, such as the Food and Drug Administration’s “Voluntary Quality Importer Program (VQIP)” or Customs and Border Protection’s “Trusted Trader” program.

For example, the reporting of supply chain traceability and chain of custody procedures for admittance into the program and eventual permit renewal can mirror the “Quality Assurance Program” of VQIP. The Quality Assurance Program as submitted to NOAA could consist of a collection of written policies and procedures used to ensure adequate control over the legality and sustainability of imported products. Elements of the Quality Assurance Program submitted for an entity’s review and renewal could include:

- The supply chain traceability and sustainability policies of the company;
- The implementation plans and risk mitigation practices for traceability/sustainability procedures;
 - This should include results of an annual self-audit and any corrective action taken to mitigate weaknesses along the supply chain;
- The organizational structure of the company, including the identification and contact information of those tasked with traceability and sustainability implementation;
- The experience and training requirements for employees responsible for the supply chain traceability and sustainable sourcing practices.

The Trusted Trader Program may also draw significantly from related federal programs in relation to treatment of importer participants. For example, participation and a history of compliance with CBP’s Trusted Trader Program and/or VQIP should be taken into consideration when reviewing applications for

the seafood Trusted Trader Program, and favorable review given to participants with strong records of compliance. Further, many of the Trusted Trader Program benefits could mirror those offered by current federal import programs as they apply to importers, ensuring consistent treatment for good actors across industry sectors.

Finally, efforts to eventually synergize the benefits and application/program renewal procedures of existing federal import programs such as NOAA's Trusted Trader, VQIP and CBP's Trusted Trader should be made to reduce reporting redundancies and increase efficiency for monitoring and enforcement. Importers participating in several federal import programs should eventually be given the opportunity for one application procedure and program that rewards best practices in compliance to customs law, food safety, and legal/sustainable sourcing.

THIRD PARTY TRACEABILITY SYSTEMS

Importers and supply chains importing products into the U.S. market that are covered by a private certification system that meet the highest global standards established by the International Standards Organization (ISO) and are demonstrably capable of ensuring both the validity of underlying information and product traceability could qualify for Trusted Trader status. Third party traceability systems that certify the chain-of-custody of the supply chain need to collect the information related to the legality of the catch and the traceability requirements as defined in the Seafood Import Monitoring Program, including being able to trace the key catch information back to individual vessels. In most cases, though, Trusted Trader criteria will need to look at both dimensions – the validity of the underlying catch information and the security of the traceability processes and systems in place.

TIMING AND IMPLEMENTATION

WWF proposes that the process for application to be a Trusted Trader commence with implementation of the final rule. Approved applicants should comply with the Program requirements within a year (12 months) after publication of the final rule.

CONCLUSION

It is clear that the Trusted Trader Program is a key component to how the new Regulation would work in practice. If a high bar is set, based on clear and transparent criteria that ensure a "Trusted Trader" is truly trustworthy, accountable, and where the information provided can be independently verified, then the Program will be effective. The final rule though, must be strong to incentivize participation in a Trusted Trader Program, and will be less impactful if a strong verification system is not in place for the final rule.

The Trusted Trader Program should be crafted to reward the best practices for legal sourcing and traceability of products and to create conditions that also reward sustainable sourcing of products from market actors. Participation in the Trusted Trader can be incentivized by creating benefits for easier access to the market and a strong enforcement and implementation of the final rule. Both must occur to successfully prevent IUU products from entering the market and to create the positive change needed to ensure sustainable and legal fisheries across the globe.

Thank you for all of the hard work and continued commitment to a thoughtful, open process and for the opportunity to comment on the development of the Trusted Trader Program.

Sincerely,

A handwritten signature in black ink, appearing to read "Michele Kuruc". The signature is fluid and cursive, with the first name "Michele" and last name "Kuruc" clearly distinguishable.

Michele Kuruc
Vice President, Oceans Policy
World Wildlife Fund – U.S.

APPENDIX 1 – Status Overexploited or Unknown for “At Risk” Species

ABALONE

Region	Stock	Scientific name	Main Fishing Countries	State of Exploitation
Southeast Atlantic (FAO Area 47)	Perlemoen abalone	<i>Haliotis midae</i>		O

PACIFIC COD

Region	Stock	Scientific name	Main Fishing Countries	State of Exploitation
Eastern Central Pacific (FAO Area 77)	Cods, hakes, haddocks			Unknown

GROUPER

Region	Stock	Scientific name	Main Fishing Countries	State of Exploitation
Mediterranean and Black Sea (FAO Area 37)	Dusky grouper	<i>Epinephelus marginatus</i>	Turkey, Libya, Italy, Greece	O
Western Central Atlantic (FAO Area 31)	Groupers	<i>Epinephelus morio</i>	Venezuela, Mexico, Dominican Rep.	O

RED SNAPPER

Region	Stock	Scientific name	Main Fishing Countries	State of Exploitation
Western Central Atlantic (FAO Area 31)	Snappers	<i>Lutjanus campechanus</i>	Venezuela, US, Mexico, Cuba	O

SHRIMP

Region	Stock	Scientific name	Main Fishing Countries	State of Exploitation
Mediterranean and Black Sea (FAO Area 37)	Deep-water rose shrimp	<i>Parapenaeus longirostris</i>	Turkey, Tunisia, Italy, Algeria	O
Western Indian Ocean (FAO Area 51)	Indian white prawn			O
Western Indian Ocean (FAO Area 51)	Knife shrimp	<i>Haliporoides triarthrus</i>	Mozambique	O

Western Central Atlantic (FAO Area 31)	Northern pink shrimp	<i>Penaeus duorarum</i>	US, Mexico, Cuba	O
Eastern Central Atlantic (FAO Area 34)	Penaeus shrimps NEI	<i>Penaeus spp.</i>	Sierra Leone, Cote d'Ivoire, Congo, Cameroon	O
Western Central Pacific (FAO Area 71)	Penaeus shrimps NEI	<i>Penaeus spp.</i>	Thailand, Philippines, Australia	O
Western Central Atlantic (FAO Area 31)	Redspotted shrimp	<i>Penaeus brasiliensis</i>		O
Eastern Indian Ocean (FAO Area 57)	Sergestid shrimp NEI	<i>Sergestidae</i>	Thailand, Malaysia	O
Eastern Central Atlantic (FAO Area 34)	Southern pink shrimp	<i>Penaeus notialis</i>	Senegal, Portugal, Nigeria, Gambia	O
Northwest Pacific Ocean (FAO Area 61)	Akiami paste shrimp	<i>Acetes japonicus</i>	South Korea, China	Unknown
Mediterranean and Black Sea (FAO Area 37)	Common prawn	<i>Palaemon serratus</i>	Spain	Unknown
Eastern Central Atlantic (FAO Area 34)	Natantian decapods NEI	<i>Natania</i>	Nigeria, Morocco, Italy, Ghana	Unknown
Eastern Indian Ocean (FAO Area 57)	Natantian decapods NEI	<i>Natantia</i>	Myanmar, Malaysia, Indonesia, India	Unknown
Western Central Pacific (FAO Area 71)	Natantian decapods NEI	<i>Natantia</i>	Viet Nam, Malaysia, Indonesia, Cambodia	Unknown
Western Central Atlantic (FAO Area 31)	Northern white shrimp	<i>Penaeus setiferus</i>	US, Mexico	Unknown
Eastern Central Atlantic (FAO Area 34)	Other shrimps, prawns			Unknown
Mediterranean and Black Sea (FAO Area 37)	Other shrimps, prawns			Unknown
Northwest Pacific Ocean (FAO Area 61)	Other shrimps, prawns			Unknown
Western Central Atlantic (FAO Area 31)	Other shrimps, prawns			Unknown

Western Central Pacific (FAO Area 71)	Other shrimps, prawns			Unknown
Western Indian Ocean (FAO Area 51)	Other shrimps, prawns			Unknown
Western Central Atlantic (FAO Area 31)	Penaeus shrimps NEI	<i>Penaeus spp.</i>	Venezuela, Nicaragua, Mexico, French Guiana	Unknown
Western Central Atlantic (FAO Area 31)	Rock shrimp	<i>Sicyonia brevirostris</i>	US	Unknown
Western Central Atlantic (FAO Area 31)	Royal red shrimp	<i>Pleoticus robustus</i>	US	Unknown
Southeast Atlantic (FAO Area 47)	Shrimps, prawns			Unknown

SHARKS

Region	Stock	Scientific name	Main Fishing Countries	State of Exploitation
Eastern Indian Ocean (FAO Area 57)	Rays, stingrays, mantas NEI	<i>Rajiformes</i>	Thailand, Malaysia, Australia	O
Western Central Pacific (FAO Area 71)	Rays, stingrays, mantas NEI	<i>Rajiformes</i>	Thailand, Philippines, Malaysia, South Korea	O
Western Central Pacific (FAO Area 71)	Sharks, rays, skates, etc. NEI	<i>Elasmobranchii</i>	Thailand, Philippines, Malaysia, Australia	O
Eastern Indian Ocean (FAO Area 57)	Silky shark	<i>Carcharhinus falciformis</i>	Sri Lanka	O
Eastern Indian Ocean (FAO Area 57)	Other sharks, rays, chimaeras	<i>Squatinidae</i>		Unknown
Western Central Pacific (FAO Area 71)	Other sharks, rays, chimaeras			Unknown
Eastern Central Atlantic (FAO Area 34)	Sharks, rays, chimaeras			Unknown
Northwest Pacific Ocean (FAO Area 61)	Sharks, rays, chimaeras			Unknown
Southwest Atlantic (FAO Area 41)	Sharks, rays, chimaeras			Unknown

Western Central Atlantic (FAO Area 31)	Sharks, rays, chimaeras	Unknown
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SWORDFISH

Region	Stock	Scientific name	Main Fishing Countries	State of Exploitation
Eastern Central Atlantic (FAO Area 34)	Swordfish	<i>Xiphias gladius</i>	Taiwan, Portugal, Morocco, Japan	Unknown
Mediterranean and Black Sea (FAO Area 37)	Swordfish	<i>Xiphias gladius</i>	Spain, Morocco, Italy, Greece	Unknown
Southwest Atlantic (FAO Area 41)	Swordfish	<i>Xiphias gladius</i>	Uruguay, Spain, Japan, Brazil	Unknown

TUNA

Region	Stock	Scientific name	Main Fishing Countries	State of Exploitation
Atlantic Ocean (FAO Areas 21, 27, 31, 34, 37, 41, 47, and 48)	Albacore	<i>Thunnus alalunga</i>	Taiwan, Spain, South Africa, Namibia	North: O, South: F, Med: ?
Pacific Ocean (FAO Areas 61, 67, 71, 77, 81, 87 and 88)	Albacore	<i>Thunnus alalunga</i>	Taiwan, Japan, Indonesia, China	North: O, South: N
Atlantic Ocean (FAO Areas 21, 27, 31, 34, 37, 41, 47, and 48)	Atlantic bluefin tuna	<i>Thunnus thynnus</i>	Spain, Morocco, Italy, France	West: O, East: O
Pacific Ocean (FAO Areas 61, 67, 71, 77, 81, 87 and 88)	Pacific bluefin tuna	<i>Thunnus orientalis</i>	US, Taiwan, Mexico, Japan	O
Atlantic Ocean (FAO Areas 21, 27, 31, 34, 37, 41, 47, and 48)	Southern bluefin tuna	<i>Thunnus maccoyii</i>	Taiwan, South Africa, South Korea, Japan	O
Indian Ocean (FAO Areas 51, 57 and 68)	Southern bluefin tuna	<i>Thunnus maccoyii</i>	Taiwan, Japan, Indonesia, Australia	O
Pacific Ocean (FAO Areas 61, 67, 71, 77, 81, 87 and 88)	Southern bluefin tuna	<i>Thunnus maccoyii</i>	Taiwan, New Zealand, Japan, Australia	O
Western Central Pacific (FAO Area 71)	Tuna-like fishes NEI	<i>Scombroidei</i>	Viet Nam, New Caledonia, Malaysia, Australia	O

Region	Stock	Scientific name	Main Fishing Countries	State of Exploitation
Eastern Central Atlantic (FAO Area 34)	Frigate and bullet tunas	<i>Auxis thazard</i> , <i>A. rochei</i>	Togo, Sao Tome & Principe, Russia, Cape Verde	Unknown
Western Indian Ocean (FAO Area 51)	Kawakawa	<i>Euthynnus affinis</i>	Yemen, Maldives, Iran, India	Unknown
Atlantic Ocean (FAO Areas 21, 27, 31, 34, 37, 41, 47, and 48)	Other tunas and tuna-like species			Unknown
Indian Ocean (FAO Areas 51, 57 and 68)	Other tunas and tuna-like species			Unknown
Pacific Ocean (FAO Areas 61, 67, 71, 77, 81, 87 and 88)	Other tunas and tuna-like species			Unknown
Eastern Central Atlantic (FAO Area 34)	Other tunas, bonitos, billfishes			Unknown
Eastern Central Pacific (FAO Area 77)	Other tunas, bonitos, billfishes			Unknown
Mediterranean and Black Sea (FAO Area 37)	Other tunas, bonitos, billfishes			Unknown
Southeast Atlantic (FAO Area 47)	Other tunas, bonitos, billfishes			Unknown
Southeast Pacific (FAO Area 87)	Other tunas, bonitos, billfishes			Unknown
Southwest Atlantic (FAO Area 41)	Other tunas, bonitos, billfishes			Unknown
Western Central Atlantic (FAO Area 31)	Other tunas, bonitos, billfishes			Unknown
Western Indian Ocean (FAO Area 51)	Other tunas, bonitos, billfishes			Unknown
Atlantic Ocean (FAO Areas 21, 27, 31, 34, 37, 41, 47, and 48)	Skipjack tuna	<i>Katsuwonus pelamis</i>	Spain, Netherlands Antilles, Ghana, Brazil	West: N, East: N
Indian Ocean (FAO Areas 51, 57 and 68)	Skipjack tuna	<i>Katsuwonus pelamis</i>	Sri Lanka, Spain, Maldives, Indonesia	N

Region	Stock	Scientific name	Main Fishing Countries	State of Exploitation
Pacific Ocean (FAO Areas 61, 67, 71, 77, 81, 87 and 88)	Skipjack tuna	<i>Katsuwonus pelamis</i>	Philippines, South Korea, Japan, Indonesia	East: F, West: N
Pacific Ocean (FAO Areas 61, 67, 71, 77, 81, 87 and 88)	Yellowfin tuna	<i>Thunnus albacares</i>	Philippines, Mexico, Japan, Indonesia	East: F, West: N