

IPNLF Position Statement submitted to Panel 1
28th Regular Meeting of ICCAT
13-20th November, New Cairo, Egypt

During 2023, the International Commission for the Conservation of Atlantic Tunas (ICCAT) has spent much time deliberating and discussing measures to manage tropical tunas during four intersessional meetings of Panel 1. It is concerning that discussions have taken up so much time while IPNLF believe ICCAT will have to show more ambition and determination to ensure the sustainability of tuna fishing, and preservation of Atlantic ocean ecosystems for future generations, than we have seen recently. IPNLF urges the Commission to address the following priorities:

SUSTAINABLE, ROBUST MANAGEMENT

Total Allowable Catch (TAC) allocations for bigeye (BET) and yellowfin (YFT) tunas have been exceeded multiple times in recent years. Whilst the BET stock may no longer be subject to overfishing, it remains overfished and should be given time to recover before it faces increased fishing pressure. The status of the YFT stock remains less clear, but it's concerning that since the last stock assessment in 2019, the TAC has been consistently exceeded, by as much as 35% in some years. This situation ultimately puts the future of these important stocks, fisheries, and the livelihoods they support in jeopardy.

What is IPNLF asking ICCAT to do?

- Adopt **precautionary TAC limits** for bigeye (overfished) and yellowfin (awaiting assessment after consistent overages) tuna stocks in line with the SCRS advice which provide a **high likelihood of stock recovery** within the next 2 generations (15 years for BET, 14 years for YFT) while **critically meeting the needs of small-scale fisheries and the communities dependent upon them**.
- Prepare and implement **Harvest Control Rules (HCR) for both the bigeye and yellowfin stocks based on the latest scientific advice**, and encourage the Commission to adopt HCRs for other tropical tunas as established in [Rec. 15-07](#).
- Implement **stronger monitoring, conservation and management measures to prevent catches beyond the TAC**, with suitable consequences defined for overages.



SUPPLY VESSELS

Supply vessels increase the capacities of the purse seine fisheries to damage tuna stocks and ecosystems, with those fleets being the major drivers of overfishing of multiple tuna stocks. As a result of their negative impacts, supply vessels have been banned in both the WCPFC and IATTC, through capacity management and conservation measures, and have also been limited at the IOTC. The lack of regulations for these vessels in the Atlantic Ocean is driving concerns for sustainability, traceability and compliance monitoring.

What is IPNLF asking ICCAT to do?

- As a minimum, **limit the number of support vessels permitted per purse seine vessel**, as has been done at IOTC, or even **ban support vessels** as WCPFC and IATTC have done.
- Pay full attention to analyses presented on the impact of support vessels on juvenile YFT and BET catches by the SCRS, as illustrated in paragraph 33 of Recommendation 22-01.

EQUITABLE ALLOCATION

IPNLF believes that equitable allocation to meet the rights and needs of all nations, especially developing coastal states representing impoverished communities and small-scale fisheries, should not be conditional upon increased catches being imposed upon an already overfished stock. Equity should be proactively, inherently and unavoidably incorporated within all RFMO allocation mechanisms.

What is IPNLF asking ICCAT to do?

- Adopt an **equitable approach to distributing precautionary TACs for each species**, which critically supports the rights, needs and aspirations of developing coastal States through achieving a more equitable allocation of fishing opportunities, irrespective of the overarching TAC limit. We suggest that quotas be distributed as percentages to all states to ensure the longevity of equity regardless of changing TACs.
- Consider developing, with the rest of the Commission, an **updated allocation criterion from Resolution 15/13** in which socio-economic dependence, coastal state livelihoods, and gear selectivity are prioritised above historical rights, as is being pushed by large harvesters.
- In cases of TACs being increased due to scientific evidence of stock status improvements, ICCAT should distribute additional catch opportunities according to economic, social and environmental criteria that will continue to improve allocation equity over time.

CONSERVE THE YELLOWFIN TUNA STOCK

The Atlantic yellowfin tuna stock currently has a TAC of 110,000 t, this has been exceeded for a number of consecutive years, most notably in 2020 when catches reached 149,202 t, 35% over the TAC. IPNLF recommends that the Commission take steps to prevent the stock deteriorating into an overfished state and respond accordingly to any advice from the SCRS.



What is IPNLF asking ICCAT to do?

- Implement **stronger conservation and management measures** to prevent catches beyond the TAC, with suitable consequences defined for overcatch.
- **More effectively limit the use and impacts of drifting fish aggregating devices (FADs)**, which are a key driver of juvenile harvests from this stock.
- Prepare a **Harvest Control Rule (HCR) for yellowfin tuna** ahead of the stock assessment provisionally planned for 2024.
- Develop and implement a **YFT allocation table which includes all CPCs**, similar to what has been proposed for BET.

EFFECTIVE FAD MANAGEMENT

Measures on drifting Fish Aggregating Devices (dFADs) implemented at ICCAT have already appeared to be effective in initiating recovery of the bigeye tuna stock, largely through reducing fishing pressure upon juveniles as expected. Analyses and projections presented during the IOTCs recent 5th Working Group on FADs showed that purse seine dFAD closures are the most effective opportunity for recovering multiple tropical tuna stocks. Therefore, given the vast array of negative ecological impacts driven by dFADs, the Commission should take all possible measures to manage dFADs effectively and mitigate their negative impacts.

What is IPNLF asking ICCAT to do?

- **Maintain or extend the oceanwide 72-day FAD Closure and the 15-day deployment ban beforehand.** IPNLF believe these are the most impactful measures currently supporting stock health and potential recovery.
- Mandate that all dFADs have **completely non-entangling designs** (prohibiting netting or other meshed materials), be constructed from **biodegradable** materials, and require vessels to **retrieve those that do not meet these requirements**. ICCAT's current language falls short of that in other tRFMOs and the lack of clarity fails to manage dFAD designs effectively.
- **Make all dFAD data transparent and available within a public dFAD Registry that would enable scientific analysis and compliance monitoring**, as suggested by South Africa, Japan and Brazil in PA1_OCT_04.
- **Implement an Independent dFAD Monitoring System** that will track drifting FAD movements on ocean currents, enable compliance monitoring, determine the ultimate fate of all deployed dFADs and inform efforts to recover dFADs before they illegally fish in waters where they are not permitted or damage sensitive coastal ecosystems.
- **Further investigate and react to multiple warnings from scientists that high proportions and resultant volumes of juvenile BET and YFT in dFAD catches reduce the potential sustainable Maximum Sustainable Yields (MSY) for these stocks, because larger spawning stock biomasses are required to compensate for juvenile harvests.** This is the current driver of the need for greater precaution when making fisheries management decisions while, clearly, ongoing efforts to dilute dFAD regulations and simultaneously increase TACs contradict these warnings. Develop a **Polluter Pays Mechanism** for dFAD pollution and ecosystem impacts.

