



Indian Ocean Tuna longline FIP Position Statement for IOTC in 2020

Drafted with agreement from all Indian Ocean Tuna Longline FIP Participants

October 2020

The submission of this position statement is on behalf of the [Indian Ocean Tuna Longline FIP](#). Fishery targets albacore (*Thunnus alalunga*), bigeye (*Thunnus obesus*) and yellowfin (*Thunnus albacares*) tuna in the Indian Ocean, fished by Malaysian and Taiwanese flagged vessels. The vessels are managed under the Indian Ocean Tuna Commission, IOTC.

This Fishery Improvement Project aims to meet the rising global demand for tuna and other large pelagics in a sustainable manner by assuring catches do not exceed sustainable levels, promoting the ecosystem-based approach to fisheries management and strengthening policy and governance systems in the region. The end goal is to achieve certification under the [Marine Stewardship Council](#) Fisheries Standard by the latest 2024.

Currently, the fishery would not be able to pass MSC assessment due to issues surrounding both Principle 1 and Principle 2 elements. In light of this, we as a FIP ask you to act on the following points:

Harvest Controls

- **Ask1:** *Adopt an effective rebuilding plan for yellowfin tuna that gives full effect to the advice of the IOTC Scientific Committee and achieves spawning biomass of BMSY by 2024 with at least 50% probability and has at least a 60% probability of maintaining the stock within the Kobe green zone thereafter, including through such management options as time/area closures (e.g., FAD closures or total closures) that are based on the scientific advice, and ensuring all gears harvesting yellowfin are taken into account. (Action 1.1 in the FIP workplan)*

In 2018, the Scientific Committee reported that catches of yellowfin tuna exceeded the management measures agreed by the Commission. For yellowfin tuna, a species that is overfished and subject to overfishing, an over catch of 3% places further stress on this resource.

The Commission needs to take decisive action to end overfishing of yellowfin tuna. Non-compliance with Resolution 19/01 for an interim rebuilding plan for the Indian Ocean yellowfin tuna stock is likely resulting in further declines in this stock. We appreciate the introduction of consequences for exceeding catch limits but the resolution needs to go further to achieve its goals especially regarding CPCs which are not subject to the limits that have increased their catches dramatically, which led to the 3% increase in total catch in 2017 total catch. These increases are large, for example, Indonesia saw an increase of yellowfin catch by 71% in the past year

- **Ask 2:** *Adopt species-specific harvest strategies and management strategy evaluation as soon as possible, particularly for yellowfin and bigeye tuna, and conduct a review of the LRP in Resolution 15/10 to allow for the adoption of harvest control rules by 2020. (Action 1.2 of the FIP workplan)*

In 2017 the IOTC agreed to the Schedule of Work for the Development of Management Procedures that outlines the tasks to be undertaken by the IOTC and its subsidiary bodies for the development of harvest strategies for key IOTC species. Despite the considerable work completed to date, the Commission has not yet considered any further proposals to compile this work into binding Resolutions. IOTC CPCs must now bring the scientific and technical work together as a proposal for the consideration of the Commission.

Bycatch reduction and Shark Finning

- **Ask 3:** *Strengthen Shark, Turtle, Seabird and Cetacean Management through adopting sufficient measures to limit fishing mortality on sharks, as recommended by the IOTC Scientific Committee and take immediate steps to enforce IOTC Resolution 17/05 on shark finning through the Compliance Committee. (Action 2.1 in the FIP workplan)*



Science-based conservation and management measures to limit fishing mortality on bycatch, including species of special interest such as sharks, turtles and seabirds, must be adopted and implemented. Data collection and reporting from all CPCs is essential to support the adoption of bycatch mitigation measures based on the best available science and the precautionary approach (Resolution 12/01).

In 2016, the IOTC adopted Resolution 16/06, a mechanism to encourage CPCs to comply with reporting obligations for sharks and other bycatch species. The paucity of data on catches and interactions with non-target species prevents assessments and hinders the provision of scientific advice for effective conservation measures.

Data on sharks in the IO are extremely limited, preventing accurate assessments of shark species status. However, even with the limited data available, it is clear that the abundance of some species is declining. While the IOTC does not have a clear mandate to manage shark fisheries, it must take action to mitigate the impact of tuna fisheries on shark populations. The IOTC needs to adopt scientifically proven bycatch mitigation measures for all gear types to mitigate the impact of fishing on all bycatch species. Additional specific asks include:

- **Ask 4:** Adopt sufficient measures to limit fishing mortality on sharks, as recommended by the IOTC Scientific Committee. *(Action 2.1 in the FIP workplan)*
- **Ask 5:** Take immediate steps to enforce IOTC Resolution 17/05 on shark finning through the Compliance Committee. *(Action 2.1 in the FIP workplan)*
- **Ask 6:** Strengthen IOTC Resolution 17/05 on shark finning by requiring that all sharks be landed with fins naturally attached to align with the WCPFC's new CMM on sharks (19-04), which comes into effect on 1st November 2020. *(Action 2.1 in the FIP workplan)*
- **Ask 7:** Adopt Best Practices for the Safe Release of Sharks and Mobulid and Manta Rays, as have been adopted in the WCPFC and IATTC. *(Action 2.1 in the FIP workplan)*
- **Ask 8:** Amend Resolution 12/04 on turtle conservation to implement scientifically proven mitigation measures for all longline and gillnet fisheries, require all turtles to be identified to species level, and improve the minimum data observer data requirements for turtles. *(Action 2.1 in the FIP workplan)*

Observer Coverage

- **Ask 9:** Urgently address data gaps including low observer coverage in longline fisheries. *(Action 2.4 and 2.5 of the FIP workplan)*

Comprehensive observer coverage is a critical component of monitoring and management for sustainable tropical tuna fisheries. Observer data also can be used for monitoring vessel compliance with management measures. The paucity of data on catches and interactions with non-target species in the IOTC prevents assessment and hinders scientific advice for effective conservation measures. Resolution 11/04 only requires 5% observer coverage irrespective of the gear and/or area of operation. In this regard, the IOTC appears to be lagging behind other RFMOs.

There is room for improvement on the best practices for observer coverage. The Commission was unable to agree on even modest proposals to increase coverage rates from a minimum of 5% to 10-30% in 2018. Although electronic monitoring is not a replacement for onboard human observers, the technology can be used where placement of human observers is not possible for certain fleets or vessel sizes, including longliners. Standards for the use of electronic monitoring, including review rates by dry observers, must be adopted as a matter of priority. Observer coverage rates in the IOTC must increase to strengthen data collection, including of rare species interactions and events, and to ensure rigorous compliance monitoring.

Monitoring, Control and Surveillance

- **Ask 10:** Strengthen MCS measures, such as VMS and the ROS, to support data collection, monitoring and the implementation of harvest strategies. Many reporting countries already have the data which needs to be uploaded to IOTC databases. *(Action 2.6 of the FIP workplan)*

Fisheries management relies on the adoption and implementation of effective MCS tools. MCS tools include technologies and programs such as satellite Vessel Monitoring Systems (VMS), independent observer

Key Traceability Ltd. Company Registered in England, Number 9730288, VAT No. 257022718

<http://keytraceability.com/>



programs, port monitoring, electronic reporting and monitoring and IUU Vessel Lists. When integrated and working in concert, MCS tools strengthen the Commission's ability to detect non-compliance and IUU fishing. This in turn reduces uncertainty in the management regime and strengthens confidence that the measures adopted are fully implemented.

The Second Performance Review recommended that the IOTC develop and implement an integrated MCS program. In 2019 the Commission considered ways to strengthen the IOTC VMS program and minimum standards for the national observer programs operating under the Regional Observer Scheme. IOTC's current VMS program is not an effective MCS tool, and for many fleets, implementation of and compliance with the existing VMS requirements is very low. Likewise, the implementation of national observer programs under the Regional Observer Scheme remains very low and lacks minimum standards.

Compliance

- **Ask 11:** *Continue to strengthen the IOTC compliance assessment process. (Action 3.1 in the FIP workplan)*

The IOTC has been operating a transparent compliance assessment process since 2011. However, improvements are still needed to continue strengthening the process, given the continued high level of non-compliance by CPCs.

The IOTC Compliance Committee reports indicate there is significant CPC non-compliance and gaps in implementation with a range of IOTC measures, which increases uncertainty and reduces the effectiveness of IOTC conservation and management measures and the IOTC generally.

Many thanks for taking time to read our position statement. If you have any questions or comments, please do not hesitate to get in touch.

Kind regards,

Tom Evans - FIP Manager *on behalf of the* Indian Ocean Tuna Longline FIP
t.evans@keytraceability.com