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Policy Priorities for the Indian Ocean Tuna Commission

The Pew Charitable Trusts recommends that the Indian Ocean Tuna Commission (IOTC) takes several actions at its 21st Session in Yogyakarta, Indonesia to ensure sustainable fisheries management for highly migratory species, including tuna and sharks, and to prevent illegal, unreported, and unregulated (IUU) fishing in the IOTC Convention Area.

Continue Development of Management Procedures and Improve Gear Management for Tuna Species

Continue to advance precautionary management procedures

Pew encourages the Commission to continue development of management procedures, also called harvest strategies, for IOTC fisheries as a means to achieve more sustainable and profitable fisheries. Last year, IOTC took a leadership role on management procedures among the tuna RFMOs, agreeing to a harvest control rule for skipjack tuna through the adoption of Resolution 16/02. We urge the Commission to build on this success by supporting additional work on management strategy evaluation (MSE) for yellowfin, bigeye and albacore. Conducting full MSEs for these species will enable the Commission to confidently select harvest control rules that will best achieve the fisheries' objectives.

Improve fish aggregating device management

The increasing use of Fish Aggregating Devices (FADs) in the Indian Ocean has negatively impacted targeted tuna stocks, non-target species, and the marine environment. There is no evidence that the current cap on FADs purchased or monitored by each vessel has reduced the number of FADs actually deployed in the region. Numbers of purse seine vessels and supply vessels can continue to increase, undermining limits or caps that are assigned per vessel. There is also no evidence that the overall FAD fishing effort has been reduced as a result of these caps. Indian Ocean yellowfin is overfished and experiencing overfishing, and purse seine captains have recently reported a total absence of skipjack free schools in the region – both at least partially the result of increasing FAD use.

In March, more than 30 leading FAD scientists participated in a Global FAD Science Symposium where they agreed that shifting some purse seine fishing effort from FADs to unassociated tuna schools, along with a real reduction in the number of FADs deployed, represents a currently available 'best practice' to mitigate impacts on target species, among other issues. Shifting effort

could be achieved voluntarily, through economic incentives, or through annual FAD set limits or purse seine catch limits of bigeye or yellowfin. Participants also concluded that, with further development, technological and methodological advances – such as identification of sub-regional hotspots or determination of species composition of schools pre-set – represent a promising or potential approach to reduce juvenile tuna mortality, but only if regulatory or market incentives are in place to encourage purse seine operations to make good decisions. Many of these points were also agreed as key areas for future action for RFMOs at the first joint meeting of the IOTC, IATTC, and ICCAT FAD working groups in April 2017.

It is time to operationalize several of the key outcomes of these two meetings at the IOTC Commission meeting. In particular, Pew urges the Commission to develop basin-wide FAD set and deployment limits to reduce unsustainable catches of juvenile tunas, minimize impacts on vulnerable species, and mitigate the contribution of FADs to marine debris and beaching/grounding in sensitive coastal habitats. We also encourage the Commission to establish a more comprehensive system to accurately quantify and monitor FAD use that would provide data necessary to assess compliance and conduct tuna stock assessments.

Adopt Conservation and Management Measures to Protect Sharks

Regulate all shark catch

Every year, about 100 million sharks are caught and killed in commercial fisheries, an unsustainable number. Whether this catch is unintended, unwanted, or highly sought after, the impact on ocean ecosystems demands urgent action. IOTC fisheries must not contribute to the global overfishing of sharks that has led to significant declines globally. If IOTC members are to continue to target sharks, or retain shark bycatch, the precautionary principle must be taken into account, and management measures must ensure that all shark catches in the IOTC Convention Area are sustainable.

Until measures are in place to ensure that the targeted and incidental catch of sharks is sustainable, their capture with fishing gear should be avoided and they should be released alive whenever possible. Gear that increases the likelihood of shark catch, such as wire leaders and shark lines, should be prohibited, depleted species should be fully protected, and further research should be undertaken to determine the best means of avoiding shark catch.

Prohibit the retention of manta and mobula rays

It is encouraging to see the submission of proposal IOTC-2017-S21-PropCfrom the Maldives and the Seychelles that, if adopted, would mandate the release of all manta and mobula rays when they are bycaught in purse seine fisheries.

These manta and mobula species, which are protected under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), are some of the oceans' most vulnerable animals, and have suffered significant declines globally. This proposed measure would bring the IOTC into line with similar controls adopted by IATTC and being considered by

WCPFC, and would utilize existing guidance on how to safely release these animals to assist in their recovery.

Properly manage biologically vulnerable shark species

Silky sharks (*Carcharhinus falciformis*) are commonly caught in all IOTC fisheries. Between 2010 and 2014 an average of 4,088 tons of silky shark were reported to the Indian Ocean Tuna Commission (IOTC) as landed annually, and the Scientific Committee has noted that maintaining or increasing effort will likely result in further declines in biomass, productivity, and catch per unit of effort (CPUE). At current effort levels, the stock status is at considerable risk.

The IOTC Scientific Committee's report notes that "despite the lack of data, it is clear from the information that is available that silky shark abundance has declined significantly over recent decades." Of the ten shark species most vulnerable to purse seine and longline fishing gear, silky sharks ranked second and fourth respectively, as determined by the IOTC ecological risk assessment (ERA). According to the IUCN Red List, silky sharks are Near Threatened in the western and eastern Indian Ocean, as well as globally. The silky shark was also listed on Appendix II of CITES in September 2016; this listing will limit international trade to sustainable levels, as well as complement and help enforce compliance with RFMO measures globally.

Because of the continued population declines, silky sharks are in need of immediate protection. As such, and given the recent CITES listing, IOTC should work to protect this vulnerable species by adopting measures to either regulate the number that can be caught or prohibit all retention of the species.

The Commission should consider similar action for mako, blue and hammerhead sharks that are being caught in unregulated target and bycatch fisheries in the IOTC convention area.

Strengthen Controls Against IUU Fishing

Effectively use VMS

Vessel monitoring systems (VMS) are an integral component of fisheries management and monitoring, control, and surveillance regimes. They have a central role in helping to combat IUU fishing in regulated fisheries, and VMS data provides valuable information for scientific stock assessments, particularly when data sets are provided frequently.

As of April 2016, CPCs should have adopted VMS for any vessel greater than 15 meters in length overall operating in the high seas within the IOTC Convention. In addition, all vessels 24 meters or greater, and all vessels under 24 meters operating outside the jurisdiction of their flag state should also have had VMS by April 2016. Any CPC that was not in compliance by this time is required to submit an implementation plan for their national VMS obligation within a maximum of 3 years. Regrettably, full compliance was not achieved for either of these requirements.[i] Pew hopes that information submitted by CPCs in 2017 will indicate full compliance.

Recent advancements in technology and reductions in equipment and transmission costs have improved and expanded the functionality of VMS, allowing the system to be fully integrated into

fisheries management arrangements. While the Commission should ensure that as of 2017 all CPCs are fully compliant with current VMS requirements, to maximize effectiveness it should continue to work towards a strengthened VMS system that effectively supports the monitoring, control and surveillance efforts of CPCs and is conducive to improved fisheries management in the IOTC Area of Competence. In this regard, the Commission should initiate a process to establish a Commission VMS, which would centralize VMS data and support CPCs in their implementation of VMS requirements.

Effectively implement the IMO number requirement to more easily identify and monitor vessels

As of 1 January 2016, all vessels 24 meters or greater and all vessels under 24 meters operating outside the jurisdiction of their flag state should be duly identified with the International Maritime Organization (IMO) number. This requirement is essential to ensure the effective monitoring and control of fishing vessels at sea and in port. The Secretariat has continued to improve the quality of the existing Record of Vessels, also in the context of the Consolidated List of Authorized Vessels (CLAV). However, as of now, the IOTC Record of authorized vessels indicates that only 47.3% of all vessels mandated to have an IMO number have obtained this number. IOTC CPCs should take the necessary steps to ensure there is no further delay in complying with the IMO number mandate. IMO Circular Letter 1886/Rev.6 extends the numbering scheme to cover smaller and non-steel hulled fishing vessels. Fishing vessels of non-steel hull construction of 100 GT and above and all motorized inboard fishing vessels of less than 100 GT down to a size limit of 12 metres in length overall (LOA), that are authorized to operate outside waters under national jurisdiction, are now eligible to obtain an IMO number. IOTC should require *all* eligible vessels to obtain and IMO number.

Keep the IUU vessel list up to date

Placing a vessel on IOTC's IUU vessel list serves as an essential step in deterring unacceptable practices in the Convention Area. The list's effectiveness, however, is diminished because under current rules IUU vessels can only be added to the list once a year. That allows some IUU vessels to operate unhindered until action is taken by the Commission at its annual meeting. On the other hand, IOTC has established procedures that permit delisting of vessels from the list on an intersessional basis. Procedures should be established so that vessels can also be listed on an intersessional basis. In addition, IOTC should take steps to ensure that the IUU vessel list is monitored regularly and updated whenever a vessel changes name, flag, or other identifying feature.

Ban transshipment at sea unless it can be monitored and regulated in a transparent and accountable way

Transshipment at sea continues to be used in the IOTC Convention Area as a way to avoid proper catch reporting and to launder fish caught illegally. IOTC should ban transshipment at sea, particularly for longline vessels, until it can be verified that these operations do not assist IUU fishing. This would require a robust monitoring system to guarantee full transparency and would include, but not be limited to, requiring observers aboard offloading and receiving vessels and comprehensive oversight by the Commission of *all* transshipment operations in the Convention Area.

Increase observer coverage

IOTC Resolution 11/04 requires observer coverage on at least 5% of operations or sets for each gear type by the fleet of each CPC while fishing in the IOTC area of competence for vessels 24 meters or longer, and on vessels under 24 meters if they fish outside their Exclusive Economic Zone (EEZ). CPCs should make every effort to meet to the coverage levels consistent with Resolution 11/04 and the Commission should raise the required observer coverage level to a level that is proven to be sufficient for carrying out the scientific duties of the Commission. As has been used in other tuna RFMOs, the IOTC and its members should consider requiring electronic monitoring (video cameras, sensors on vessel hydraulics) to supplement chronically low observer coverage levels."

[i] Implementation Reports and Compliance reports submitted to IOTC's Compliance Committee as of 3 May 2016, http://www.iotc.org/meetings/13th-session-compliance-committee-coc13