



WWF

POSITION

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WWF OCEANS PRACTICE

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WWF POSITION: 22ST SESSION OF THE INDIAN OCEAN TUNA COMMISSION (IOTC)

Bangkok, THAILAND

21st – 25th May 2018

WWF GOALS: To ensure the sustainable management of Indian Ocean tuna and in doing so support and promote the long-term viability of the tuna industry operating throughout the Indian Ocean region. To achieve the goal of maintaining a healthy ecosystem and safeguarding the rich biodiversity of the Indian Ocean region requires a joint and combined effort of Indian Ocean Tuna Commission (IOTC) members, NGOs/CSOs, developing partners and key supply chain representatives of the tuna industry.

WWF in IOTC: WWF has a long collaborative history in working with the IOTC Secretariat and its Member States, either individually or through the Commission. We also work collaboratively with key industry sectors who stand to benefit from the sustainable management of this important global resource. Since 2012, WWF has supported member states with data collection, facilitating the improvement in management of tuna fisheries, undertaken capacity building workshops with Indian Ocean coastal states. In 2017 WWF continued to support the efforts of some Coastal States to set up and operationalize an effective Artisanal Data Collection System and also supported the IOTC Secretariat in updating Conservation and Management Measures Manuals (A and B). As the Commission continues to evolve toward effective management of their tuna and tuna-like species, WWF wishes to emphasise the following key issues and associated recommendations to the IOTC 22th Session.

WWF Key Asks	Position/Recommendation
Rebuilding Yellowfin tuna stocks	<p>Review of measures introduced in resolution 17/01 for YFT stock rebuilding</p> <p>Consider development and adoption of CMMs for limiting/reducing the fishing mortality (F) at or below the interim target reference point (resolution 15/10)</p>
Allocation Criteria and Quota Allocation	Ensure allocation is based on the best available science, fair, equitable ensuring a transparent system of allocation in accordance with the relevant multilateral agreements.
Strengthening the reporting and data reliability	<p>WWF encourages all relevant CPCs to commit to full compliance with IOTC resolutions relating to data collection and reporting of catch related information.</p> <p>WWF supports the implementation of regional observer scheme resolution 11/04 and 16/04 on the implementation of a pilot project.</p>
Continue efforts for developing HCRs	WWF encourages the Indian Ocean Tuna Commission to continue the efforts and work on developing harvest strategies for other key tuna species and acknowledges the progress made by member states.
Monitoring, Control and Surveillance	<p>Strengthen Resolution 17/03 on the IOTC IUU Vessel List - including adding common ownership as a listing criterion and ensuring that flag States cannot veto IUU listing decision for their vessels</p> <p>WWF encourages all member states in the Indian Ocean to adopt and implement the Port State Measures Agreement alongside other binding resolutions including recording catch and effort data (15/01), and implementation of IOTC record of authorized vessels (15/04).</p>
Effective management of FADs	<p>Task FAD working group to continue coordinating, collaborating on, and considering research and advice presented at other RFMOs when defining IO management for drifting and anchored FADs.</p> <p>Support and collaborate with the BIOFAD project and urge CPCs visiting or fishing on FADs clearly identified as experimental to report to their national scientists the status of FAD (and devices) and their activities on this FAD (including any catch data).</p>
Conservation of other Vulnerable Species	<p>WWF also urges the Commission to reduce catches of blue sharks by 10% from current levels to increase the probability of maintaining the stock above biomass levels that can support Maximum Sustainable Yield.</p> <p>Improve reporting of shark and ray catches to species level.</p> <p>All CPCs to expedite developing an NPOA-sharks and submit reports to the Commission.</p>

WWF Key Facts

Allocation Criteria and Quota Allocation

WWF stresses the need for effective monitoring from CPCs in order to ensure that they do not exceed total allowable catches and that they limit the fishing effort for tuna stocks, implement the precautionary approach and develop appropriate schemes for the adoption of management measures which represent genuine progress and recognize fair and equitable allocation scheme. For allocation, it is essential that CPCs rights are recognized through best available science, the process is fair, transparency and equitable, in accordance with multilateral agreements. WWF strongly believes in sustaining fisheries stocks for sustaining livelihoods and reiterates the need for recognizing socio-economics, i.e. social impacts and its evaluation as a basis for allocation.

Strengthen the reporting and reliability of scientific data by improving data acquisition and validity

Despite the requirement to do so, coastal States have not been able to achieve a fully functional observer data collection and observer scheme for tuna fisheries within their countries. Considering the fact that data acquisition and validity is a primary concern and the basis of allocation criteria, allocation of amounts, rebuilding tuna stocks (YFT) among others, it is essential that data quality is ensured among each CPC in order to develop robust stock strategies. The World Wide Fund for Nature (WWF) encourages CPCs to focus on improving data collection, particularly in relation to the IOTC's Regional Observer Scheme (ROS). This will include supporting governments to improve compliance with resolution 11/04, alongside other binding resolutions including recording catch and effort data (15/01), and implementation of IOTC record of authorized vessels (15/04) and aim to achieve compliance to resolutions (05/03, 06/03, 01/01, 11/06, and 02/06) as a short to mid-term goal.

It is recommended to make use of best available science from CPCs and DWFNs including implementation of measures such as development and implementation of regional observer schemes, data collection from small scale fisheries and to improve data acquisition to IOTC and validity through rapid use of electronic monitoring and reporting systems, as regards, support development of guidelines for data collection, minimum observer coverage in small-scale fisheries engaged in the catch of tuna and tuna like species (i.e. vessels under 24 m).

Gaps and recommendations

- a. Implement recommendations PRIOTCo2.05 and PRIOTCo2.03 from the 2nd IOTC Performance Review on capacity building and data collection and reporting, respectively, as agreed in Resolution 16/03
- b. Explore alternative mechanisms to support developing CPCs' compliance with data reporting obligations under Resolutions 15/01 and 15/02
- c. Support the Science Committee's recommendation 18.84 for joint analysis of operational catch and effort data from multiples fleets
- d. Adopt the Science Committee's recommendation to strengthen the penalty mechanisms adopted in Resolution 16/06 on measures applicable in case of non-fulfilment of reporting obligations in the IOTC to improve compliance by CPCs in terms of the submission of basic fishery data in accordance with Resolution 15/01 and 15/02.
- e. Encourages all CPCs to implement the regional observer scheme, with measures for observer safety and security (11/04) and to report catches of tuna and tuna like species of vessels engaged in fishing in the high seas as appropriate.

Rebuilding the Yellowfin Tuna Stock and improve management of associated species

The yellowfin tuna stocks in the Indian Ocean are overfished and subject to overfishing according to the last assessment conducted in 2016. Engagement with fishing vessels, communities, government and industry through fishery improvement projects (FIPs) to proactively address the stock health of yellowfin tuna in the Indian Ocean is an important component to manage catch levels and overfishing and support rebuilding efforts. WWF recognizes the proactive efforts of fisheries addressing improvements through the Marine Stewardship Council (MSC) standard certification process or through FIPs on the path towards MSC certification.

WWF recognizes the Commission efforts to agree on the Resolution 17/01 on an interim plan for rebuilding the Indian Ocean yellowfin tuna stock in the IOTC Area of Competence which came into effect January 2017 is yet to be evaluated to achieve the recovery of yellowfin stock, with catch limitations based on 2014/2015 levels. WWF would like to reiterate that no fishery of any significant scale can claim to be effectively managed in the absence of pre-agreed mandatory actions to be taken in response to changes in indicators of stock status. In this regard WWF recommend:

- All IOTC member States should make its best efforts to address the overfishing issue to save the fishery from depletion reduce of yellowfin tuna stock.
- All IOTC member States should adopt domestic laws and regulation to implement CMM and comply with current required minimum on-board observer coverage rates for all fisheries targeting tuna and tuna like species in the IOTC area of competence.
- Improve data collection and reporting to ensure complete data-sets (i.e. catches, effort, size frequency data), which are needed for robust stock assessments are submitted to the IOTC secretariat;
- Encourage IOTC Member States to correctly monitor yellowfin tuna catches during periods close to the end of the year, as described by EU-France and EU-Italy PS fleets in document IOTC-2017-WPDCS13-21.
- Support alternative management measures (e.g., input control measures) are investigated for purse seiners and other gears that will facilitate the control and monitoring of the management measures adopted by IOTC as proposed by IOTC-20SC17.

Meanwhile, it is welcomed that many coastal states have championed the process and prioritized neritic tuna management in 2018, it is essential for IOTC to ensure compliance to catch reductions as proposed in resolution 17/01 and make available the results of the stock assessment for CPCs.

Update on the Harvest Control Rules using appropriate Reference Points

No fishery of any significant scale can claim to be effectively managed in the absence of pre-agreed mandatory actions to be taken in response to changes in indicators of stock status. These changes in stock status can be measured against defined Reference Points. The actions to be taken by fisheries management bodies in relation to fluctuations by stocks are defined by Harvest Control Rules (HCR) which incorporate the Reference Points as triggers for these actions. HCRs are a fundamental fisheries management tool. As a result of a close coordination, consistent scientific advice provided by many concerned parties including governments, member states, NGOs and scientists IOTC Indian Ocean Tuna Commission adopted the harvest control rules in 2016. WWF accorded the development of effective Harvest Control Rules for Indian Ocean tuna fisheries the highest priority, and fully supported the IOTC in these efforts, including the facilitation of regional capacity building activities to improve the dialogue among scientists, managers and other stakeholders. In 2017, WWF led capacity building exercise to understand the MSE process even better for member states to understand the development of HCRs, as in the absence of effective harvest control rules no management strategy can be activated to reverse/rebuild the overfished stocks of yellowfin tuna. Through experiential learning it is believed that moderate changes in fishing effort can help maintain the stock in the 'green' or 'safe' range and avoid the current situation which will require long-lasting and difficult measures to rebuild the yellowfin fishery. Similar undesirable outcomes may be avoided by the adoption of harvest control rules for other IOTC species, such as bigeye tuna and skipjack tuna, in addition to all other stocks managed by the Commission.

Finally, it should be noted by states with fisheries that are considering certification of their fisheries as sustainable in order to ensure market access or improve profitability, that credible third party certification schemes require Harvest Control Rules and appropriate Reference Points to be implemented. It would be expected these states would give strong consideration to supporting their own fishing industries by actively supporting proposals contributing to achieving these outcomes.

In order to do so, WWF requests all member states to allow for adoption of resolution 15/10 and encourages to undertake similar exercise for other tuna species and associated species.

Monitoring, Control and Surveillance

Monitoring, control and surveillance (MCS) system is a key element of sustainable and well-managed fisheries. Strengthened MCS capabilities are vital in order to combating illegal, unreported and unregulated (IUU) fishing which occurs on a large scale in the Indian Ocean region from artisanal to industrial fisheries threatening and undermining social and economic benefits of healthy tuna stocks in Indian Ocean waters. Comprehensive observer coverage that addresses safety and security is integral to MCS along with effective tools to improve data for assessments and scientific advice for effective conservation measures and reduce uncertainty from non-implementation or compliance.

The catch data from tuna fisheries is not sufficiently organized, which undermines the quality of data collection and contributes to low levels of reporting from coastal and/or artisanal tuna fisheries and increases the level of uncertainty of stock assessment results. Low observer coverage within the IOTC as well as low levels of electronic monitoring both contribute to insufficient catch data, and increases the significance and impact of low catch-reporting and potentially unreported catches (of both target and non-target species)

In response to the many challenges facing improved MCS in the IOTC we recommend the following for this upcoming session:

Observer coverage

- Advance the Pilot Project for the IOTC Regional Observer Scheme (Res 16/04) to accelerate adoption of a requirement for 100% observer coverage with measures for observer safety and security on large-scale purse seine vessels
- Develop minimum standards for EMS and e-reporting information system (e-Maris), including as part of the Pilot Project for the IOTC Regional Observer Scheme (Res 16/04) and endorsed framework (IOTC-2017-S21-10) that are applicable to different gear types, and, in particular, for longline and purse seine so that EM can be used to ultimately achieve 100% observer coverage in these fisheries as a priority
- Identify and sanction non-compliance with the 5% longline observer coverage requirement
- Increase the level of longline observer coverage to 20%, including measures for observer safety and security, which has been recommended by the scientific committees of IATTC and ICCAT, in order to provide reasonable estimates of bycatch and to improve overall monitoring of the fishery.

MCS Tools

- Develop a regional best-practice satellite-based VMS
- Strengthen Resolution 17/03 on the IOTC IUU Vessel List - including adding common ownership as a listing criterion and ensuring that flag States cannot veto IUU listing decision for their vessels

Port State Measures Agreement

There is a need to build knowledge and technical capacity within government departments and relevant sectors (including industry) on the impacts of illegal, unreported and unregulated fishing. It is imperative to address unreported fishing by estimating the extent of unreported catches in the Indian Ocean, increasing engagement with states with low catch reporting and addressing the issue of dual-registry of vessels and flag hopping. It is thus a key concern to promote the ratification of Port State Measures Agreement (PSMA) across the Indian Ocean using existing frameworks and assess nation's capacity to implement the agreement.

Compliance with Conservation and Management Measures

IOTC members have adopted many highly desirable and necessary Conservation Management Measures. Unfortunately, compliance with a large proportion of these has been low.

WWF encourages all CPCs to recognise the importance of these measures in ensuring the future of their fisheries and the health of the ecosystems, from which they gain tremendous economic wealth, and urge them to work toward strengthening national and regional compliance with the adopted IOTC Conservation and Management Measures.

The work of the IOTC Secretariat in conducting many Compliance Support Missions throughout the region has resulted in notable and in some cases remarkable improvement in compliance with a number of measures. WWF urges all states which have benefited from this program to maintain or improve these levels of compliance and to work further on improving the quality of the information returned to the Secretariat in order to facilitate effective monitoring and assessment of the tuna stocks.

WWF notes the Scientific Committee recommendation that the Commission should consider the ban on large-scale driftnets within the EEZ and a resolution 17/07 was adopted at the 21st session of the commission. Considering the timeline for this resolution is to be adopted by 1 January 2022, WWF encourages member states for making their efforts to shift towards more sustainable fishing practices and reiterates its support for the implementation on this resolution.

Establish Effective Management of FADs

The region lacks effective management of FADs in terms of effort and verification. It is critical to agree, at the IOTC level, precautionary science-based limits for the numbers of deployed FADs per vessel. WWF support the use of limited numbers of instrumented FADs by purse seine fleets operating in the Indian Ocean but also urge the consideration of limiting overall effort which simple limitation of FAD numbers does not address. The creation of a FAD working group to consider and advise on the issues of effective FAD management is supported by WWF.

WWF encourages the Commission to consider proposals which act to improve the management of overall FAD effort in conjunction with per vessel limits of FAD numbers and encourage the CPCs to establish precautionary measures in order to properly manage and monitor FAD fishing activity.

Efforts to manage the environmental impact of FADs through non-entangling and biodegradable FADs should be considered in effective FAD management, and the research of fleets testing and deploying non-entangling and biodegradable FADs should be considered at the commission level.

We recommend and endeavour to see as a result of this commission meeting:

- Task FAD working group to continue coordinating, collaborating on, and considering research and advice presented at other RFMOs when defining IO management for drifting and anchored FADs.
- Ensure CPCs are implementing fully the provisions of Resolution 15/08 for the use of non-entangling and biodegradable FAD designs and amend Resolution 17/08 to include a date by which non-entangling FADs should be fully implemented, as recommended by the IOTC Science Committee
- Implement the Science Committee's recommendations regarding the development of a revised form for reporting FAD activity data and clear definition to ensure consistency in FAD data submission
- Support and collaborate with the BIOFAD project and urge CPCs visiting or fishing on FADs clearly identified as experimental to report to their national scientists the status of FAD (and devices) and their activities on this FAD (including any catch data).

Conservation of Other Vulnerable Species

WWF is committed to stronger conservation and management measures for sharks, rays, sea turtles, seabirds and cetaceans and will support proposals towards improving the protection and rebuilding populations for these key ecosystem species.

Many shark and ray species in the Indian Ocean remain subject to unsustainable levels of fishing mortality coupled with significant data gaps in catch and biological data. WWF and TRAFFIC have grave concerns with the lack of management of sharks and rays within the IOTC region as a whole. As such the Secretariat must remind coastal States in the IOTC region of their need to manage shark populations effectively, and provide assistance for doing so.

IOTC has previously recognised that CITES listed shark and ray species are caught in the Indian Ocean. IOTC members who are CITES Parties are obligated to implement the listings through conducting Non Detriment Findings (NDFs) issuing relevant permits and certificates (IOTC-2014-WPEB10-12). The IOTC committees and commission must assist CPCs by providing adequate information so that its members can adequately conduct NDFs. This is of particular importance given that catches may come from shared stocks. As with CITES listed species, sharks and rays listed within the appendices of the Convention on the Conservation of Highly Migratory Species of Wild Animal (CMS) are also caught within the IOTC area and CPCs are recommended to implement those listings.

WWF and TRAFFIC support the measures currently adopted by IOTC for sharks. However, there are further actions which need to be addressed by the IOTC at its 2018 round of meetings and into the future:

1. The Commission initiates the development of Harvest Control Rules for blue sharks (*Prionace glauca*) to reduce unsustainable mortality levels and to arrest the declines in biomass resulting from current catch rates. WWF also urges the Commission to reduce catches of blue sharks by 10% from current levels to increase the probability of maintaining the stock above biomass levels that can support Maximum Sustainable Yield.
2. Improve reporting of shark and ray catches to species level.
3. All CPCs to expedite developing an NPOA-sharks and submit reports to the Commission.
4. Encourage the development of reference points and management for non-target species, including all sharks and rays.
5. Encourage CPCs that are Parties to the Convention for Conservation of Migratory Species of Wild Animals (CMS) to develop conservation and management measures in line to meet international obligations
6. All CPCs trading shark and/or ray species listed under Appendix II of the Convention on International Trade of Endangered Species of Wild Fauna and Flora (CITES) makes any non-detriment finding publicly available.

WWF recommendations:

- Member States should comply with all Indian Ocean Tuna Commission's (IOTC's) conservation and management measures (CMMs), including measures aimed at both target and incidental market and non-market species, and all other obligations. Particularly, member States should adopt and implement National Plan of sharks.
- Aside from Regional VMS where discussion is proving longer than expected, there is ongoing and growing usage of AIS and REM with cameras by fishing fleets around the globe which should be considered by the Members in the interests of greater accountability and transparency. We strongly recommend IOTC take the lead among other RFMO's to adopt the effective use of these tools. If the industry is really concerned about the transparency in tuna management system they will adhere to this recommendations and WWF is available to support such a proposal.
- IOTC Secretariat should share with FAO the Vessel Authorized List to be recorded on the Global Fishing Vessel Record (GFVR) for the intended purpose of combating IUU. Member States should also collaborate to this end sending the flagged vessel list.
- Member States should improve data gathering for all species caught in IOTC fisheries notably through the implementation of the IOTC Regional Observer Scheme, the adoption of new REM systems and the mobile apps which WWF have been supporting in some countries.
- The Commission should pass a resolution which mandate the Secretariat to make information on non-compliance by individual members and cooperating non-members publicly online available and without restrictions in order to increase the incentive for compliance by all IOTC members and cooperating non-members.

WWF is pleased to work closely with any Indian Ocean coastal States wishing to improve these aspects of their fisheries and welcome contact from these states to discuss possible options for improvement. WWF supports the mandate and functionality of the Working Party on the Implementation of Conservation and Management Measures (WPICMM).

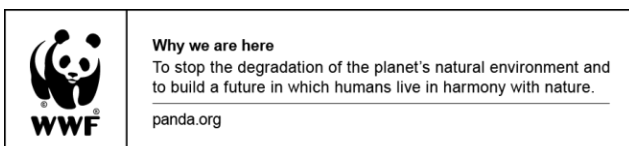
WWF understand and appreciate that the members of the IOTC are diverse in culture, language and interests. However, our main ask is that they look beyond these differences toward ensuring that the one thing they all have in common, a dependence on a shared tuna resource for the livelihoods of their communities and industries, is not threatened through a continued lack of effective fisheries management.

Finally, WWF asks that the Commission take the opportunity presented by the proposals being tabled by some of its members to take the steps necessary towards a sustainable tuna industry.

Concluding Comment

WWF understand and appreciate that the members of the IOTC are diverse in culture, language and interests. However, our main ask is that they look beyond these differences toward ensuring that the one thing they all have in common, a dependence on a shared tuna resource for the livelihoods of their communities and industries, is not threatened through a continued lack of effective fisheries management.

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