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Dear Sir/Madam,

On behalf of the Environment Group of the Pew Charitable Trusts, we hereby provide our recommendations for the 17th Session of the Indian Ocean Tuna Commission (IOTC), along with additional technical information and rationale. For more information please visit www.pewenvironment.org/ip or email international@pewtrusts.org.

The [Pew Charitable Trusts](http://www.pewcharitabletrusts.org) calls on IOTC to take the following critical actions:

1. Adopt Conservation and Management Measures to [Protect Sharks](#)

a. Prohibit the retention of oceanic whitetip, silky, and hammerhead sharks

Oceanic whitetip, silky, and hammerhead sharks are commonly caught by fishing vessels within the IOTC management area. While there are insufficient data for a full stock assessment, the IOTC Scientific Committee noted that maintaining or increasing fishing effort will probably result in further declines in the biomass and productivity of each of these species. From the information that is available, the Scientific Committee noted that the abundance of oceanic whitetip and silky sharks has declined significantly in recent years. The Parties to the Convention on International Trade in Endangered Species (CITES) recently recognized that international trade is having a detrimental impact on populations of oceanic whitetip and scalloped, smooth, and great hammerhead sharks, resulting in the adoption of proposals to include them in CITES Appendix II. All contracting Parties to the IOTC are also Parties to CITES. In addition, the International Commission for the Conservation of Atlantic Tunas (ICCAT) prohibits the retention of all of these shark species.

Notably, IOTC is the only tuna regional fisheries management organization that overlaps the oceanic whitetip shark's range but does not prohibit retention of this species. We recommend that IOTC protect these vulnerable shark species by prohibiting the retention of oceanic whitetip, silky, and hammerhead sharks in all fisheries in the Convention area, and by requiring their immediate live release.

b. Prohibit the intentional setting of purse seines around whale sharks

Whale sharks (*Rhincodon typus*) are often associated with schooling tuna, and purse seine fleets targeting tuna are known to encircle whale sharks. This process can lead to the death of these slow-moving and vulnerable animals. IOTC should prohibit purse seine vessels from intentionally setting nets around whale sharks within the convention area, and should require vessel operators to safely release incidentally encircled whale sharks. We note that the Western and Central Pacific Fisheries Commission (WCPFC) has prohibited intentionally setting of purse seines around whale sharks, and we urge IOTC to do the same.

- c. Require best practices for reducing shark finning and bycatch, including requiring that sharks be landed with their fins still naturally attached and banning the use of wire leaders or wire “traces” in fishing gear

2. Strengthen Controls Against Illegal, Unreported, and Unregulated (IUU) Fishing

- a. Continue to support the effective implementation of IOTC Resolution 10/11 on port State measures
- b. Require that IOTC vessel records include IMO numbers for all those vessels that already have such numbers
- c. Mandate International Maritime Organization (IMO) numbers for all vessels of at least 24 meters in length, or vessels operating in waters outside the exclusive economic zone of the flag state that are permitted to fish in the IOTC’s area of competence. IOTC should also require that IMO numbers be reported in all records involving vessels authorized to fish in the IOTC convention area

To support responsible and transparent fishing operations, vessels need to be readily identifiable through a unique vessel number that is verifiable worldwide. There is increasing international consensus that the IMO number, currently provided by IHS-Fairplay, represents the best option to identify individual vessels.¹

- d. Continue to support the regional partnership to combat illegal fishing in the Western Indian Ocean (“Fish-i:Africa”) and call for continued engagement by its partners

FISH-i:Africa is an initiative coordinated by the *Stop Illegal Fishing* working group of the NEPAD Planning and Coordination Agency with the support of Pew. It was established in December 2012. It is currently a partnership between the Comoros, Kenya, Mozambique, The Seychelles and the United Republic of Tanzania, all of which are IOTC members. It connects partners on a real-time basis to share information and intelligence to enable them to make decisions and take action against suspected illegal operators. *Stop Illegal Fishing* and the Pew Charitable Trusts directly support the group with the technical assistance of the IOTC Secretariat and the Indian Ocean Commission’s SmartFish Project.

We welcome the rapid progress made by the FISH-i regional partnership, which is aimed at analyzing integrated intelligence information and preparing for enforcement actions against IUU fishing operators in the Western Indian Ocean. We look forward to the continued commitment of its members and the support by the IOTC Secretariat.

3. Implement Catch Limits and Improve Monitoring and Transparency for Tuna Species

- a. Adopt science-based [Target and Limit Reference points](#)

The IOTC should fully implement Recommendation 12/14 and adopt interim target and limit reference points for its primary fisheries. Adopting reference points could help ensure healthy fisheries well into the future.

¹ For more detailed information see the Pew fact sheet, “What’s in a Number?,” which will be circulated at the 17th Session of the Commission next month.

The 14th meeting of the IOTC Scientific Committee noted that albacore is subject to overfishing; the stock assessment of skipjack contains considerable uncertainty, and the annual catches of yellowfin should be lowered as a precautionary measure². All three of these issues would be addressed by the adoption of a target and limit reference point system, which would create a precautionary buffer between allowable catch and MSY.

b. Increase the number of observers on longline vessels

The IOTC's Scientific Committee report of 2012 reports that the quality of data in longline fisheries is subject to much uncertainty³. While we recognize that 100 percent observer coverage is currently unrealistic for the entire longline fleet, IOTC should develop a plan to significantly increase overall coverage levels. Given the high impact that purse seine vessels and large-scale freezer longliners have on target, associated, and dependent species the IOTC should mandate 100 percent observer coverage on these vessels, and aspire to increase coverage levels on all other longliners to at least 20 percent by 2016, in accordance with the best available scientific advice.⁴

c. Improve [Fish Aggregating Device \(FAD\) management](#)

While the IOTC currently has a FAD management plan requirement in place, the uncontrolled proliferation of drifting FADs must be addressed as a matter of priority. IOTC members fishing with FADs are required to submit management plans and information on FAD numbers (deployed, recovered, lost), but additional requirements such as limits on the overall numbers, sharing of satellite tracking information with the Secretariat, and FAD collection policies are needed to address ecosystem impacts and marine litter resulting from uncontrolled drifting FAD use.

Thank you very much for your consideration of these recommendations. Our delegation of specialists looks forward to meeting and working with all Parties next month in Mauritius to help ensure sustainable, legal fisheries and healthy populations of tunas, sharks and other species in the Indian Ocean and adjacent seas.

Sincerely,



Susan Lieberman
Director, International Policy, Environment

² Indian Ocean Tuna Commission, Report of the Fifteenth Session of the IOTC Scientific Committee, Mahé, Seychelles, 10-15 December 2012.

³ Ibid.

⁴ Elizabeth Babcock and Ellen Pikitch, "How Much Observer Coverage Is Enough to Adequately Estimate Bycatch." Pew Institute of Ocean Science, 2003, http://www.pewtrusts.org/uploadedFiles/wwwpewtrustsorg/Reports/Protecting_ocean_life/oceana_bycatch_110403.pdf.