



ISSF POSITION STATEMENT

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The **International Seafood Sustainability Foundation (ISSF)** is a global partnership among the tuna industry, science and WWF, the global conservation organization. Our mission is to work toward the science-based conservation and management of tuna stocks and the protection of ocean health by supporting regional fisheries management organizations and advocating for the recommendations of each organization's scientific advisory body.

Our statement addresses three of the most important issues facing global tuna sustainability: reference points and harvest control rules, fleet capacity, and the management of FADs. The statement also addresses challenges specific to the IOTC.

At its 17th meeting last year, the IOTC made some great progress and adopted 11 Resolutions which addressed many of the priorities ISSF has recommended IOTC take action upon over the past several years, including development of harvest control rules and reference points; improved FAD management and strengthened data reporting requirements, along with mandatory use of non-entangling FADs; mandatory IMO numbers, at least for large-scale (24m and greater) tuna fishing purse-seine vessels; greater protections for sharks, and full tuna catch retention for purse-seine.

However there remains work to be done, and there are several issues that need to be addressed, including improved compliance with RFMO obligations, elimination of albacore overfishing, requiring sharks be landed with fins-naturally attached, and the need for all nations to supply timely and accurate statistical data on catch and effort and bycatch.

GLOBAL ISSUES

Harvest Control Rules (HCRs) and Reference Points. HCRs are a set of well-defined management actions to be taken in response to changes in stock status with respect to target and limit reference points. Unless there is a pre-agreed upon action plan for avoiding overfishing or for rebuilding an overfished stock, long negotiations lead to delayed action or inaction. This delay can lead to further damage to the stock, requiring even more aggressive curtailing of fishing. The adoption of HCRs is a key aspect of modern fisheries management, and is also a requirement of several eco-label certification programs.

ISSF endorses the application of the Precautionary Approach using clear target and limit reference points and HCRs, as called for by the UN Fish Stocks Agreement and by some RFMO Conventions. While most tuna RFMOs have at least begun consideration of limit reference points through their science committees, none have fully implemented these measures. ISSF urges all tuna RFMOs to adopt stock-specific limit and target reference points and HCRs. This is one of the most important actions that RFMO members can take to ensure the long-term sustainability of tuna stocks.

ISSF notes the substantial progress made by IOTC's adoption of Resolution 13/10 regarding Interim

*Biological Reference Points and a Decision Framework, which, in combination with Resolution 12-01 on Implementation of the Precautionary Approach, provides guidance for the Scientific Committee in structuring Management Strategy Evaluations (MSE) of management approaches consistent with the Objectives of the Commission. **In order to further progress this work toward adoption of Harvest Control Rules, ISSF fully endorses the recommendations of the IOTC Scientific Committee (SC16.49 and SC16.50) to implement and fund a process of familiarization and capacity building amongst CPCs at multiples levels, including dialogue among scientists, managers and stakeholders related to the formulation of management objectives and holding of workshops focused on providing assistance to developing CPCs. ISSF urges the Commission to take the necessary actions at its 2014 meeting to fully support these recommendations. Additionally, the Commission's 2014 Agenda should provide adequate time to initiate the management-science dialogue necessary for identifying appropriate and sufficient HCRs.***

Closed Vessel Registries and Management of Fleet Capacity. Experts agree that there is overcapacity in the global tuna fleets. Fishing fleet overcapacity increases pressure to weaken management measures and eventually leads to stock overexploitation. The first step towards managing capacity is to establish limited entry via a comprehensive closed vessel registry with an eye towards ultimately reducing the number of fishing vessels to an appropriate level

ISSF also supports the Kobe III call for a freeze in purse seine fishing capacity by developed fishing nations and creating mechanisms to transfer capacity to developing countries with aspirations to participate in these fisheries. These steps should be taken now, since scaling back fleet capacity will become even more difficult as new vessels are introduced.

To this end, ISSF applauds the adoption by IOTC of Resolution 13/07 requiring all vessels greater than 24 m to have IMO numbers by 2015. ISSF recommends that IOTC consider extending Resolution 13/07 to require IMO numbers for all vessels that are at least 100 GT in size, and to amend Resolution 03/01 to create a comprehensive closed vessel registry.

Further, given the importance of a mechanism to transfer capacity from developed to developing countries to any regional capacity management scheme, ISSF hosted a Workshop in March 2014 to start a dialogue among stakeholders on this issue. ISSF hopes this Workshop and dialog will contribute to progressing capacity management in the tuna RFMOs. The workshop report can be accessed here. <http://iss-foundation.org/resources/downloads/?did=522>

Fish Aggregating Device (FAD) Management. Setting on FADs accounts for nearly 40% of global tuna catches and 50% of global skipjack catches. The time is ripe for a concerted global effort to gather and report to RFMOs data on FADs (e.g., via logbooks) in order to better monitor FAD usage and to establish a sound basis for their management in every ocean region. Most RFMOs (other than WCPFC) recognized through their actions in 2013 that there remains a need and opportunity to improve the information about this type of fishing and have recently implemented FAD management plans that should compel CPCs to provide needed information.

ISSF notes the substantial progress made by IOTC's adoption of Resolution 13/08 regarding FAD management and reporting. Although data collection and reporting is mandated by 13/08, most CPCs have yet to implement and report on FAD monitoring. Therefore, ISSF urges the Commission to encourage CPCs to provide these data and also detailed analysis of FAD usage patterns and catch per effort analysis by the their fleets operating in the Indian Ocean, thus enabling a

determination of changes in fishing capacity and likely impacts on stocks managed through the IOTC.

*In addition to improving FAD management, **ISSF strongly supports the provisions in Resolution 13/08 that require that gradually from 2014 all FAD-directed purse seine fisheries should change to using only non-entangling FADs (FAD designs to reduce the incidence of entanglement of bycatch species, using biodegradable material as much as possible) based on the principles outlined in Resolution. ISSF encourages all CPCs to take this step as soon as possible. This is a critical step in the reduction of shark mortality and reduction of other ecosystem impacts in the Indian Ocean.***

IOTC CONSERVATION AND MANAGEMENT MEASURES

1. Tuna Stocks

The IO stocks of **bigeye, yellowfin and skipjack** are not overfished and are not experiencing overfishing, and therefore no immediate management measures are needed for these stocks. The IO **albacore** stock is being overfished (fishing mortality is 33% above MSY levels). Catches have increased substantially since 2007, particularly by longliners. If the current catch level of albacore (an average of 37,000 tonnes, over the most recent 5 years and 33,000 tonnes in 2012) is maintained, overfishing will continue and the biomass will fall below MSY. In 2013 the IOTC was not able to agree to a 20% reduction in **fishing effort** on albacore, which was the minimum reduction recommended by the IOTC Scientific Committee to ensure that the stock does not move into an **overfished** state in the near future. **ISSF urges the IOTC to adopt measures to eliminate the overfishing of albacore, such as reducing catches by at least 20% from the current level.**

2. Sharks

ISSF also congratulates the IOTC for adopting added protection measures for sharks at its 2013 meeting through Resolutions 13/05 and 13/06. The data on sharks in the Indian Ocean are extremely limited, preventing accurate assessments of the status of the region's sharks. However even with the limited data that is available, it is clear that the abundance of some species is declining. **ISSF strongly endorses the SC recommendations that the Commission A) develop mechanisms to encourage CPCs to comply with their data reporting requirement, and B) adopt sufficient measures to limit fishing mortality on sharks.**

ISSF urges the Commission to take further steps to enforce **the existing conservation and management measure addressing shark finning, and move to the total prohibition of the at-sea removal of shark fins and mandate that fins remain naturally attached for all sharks landed.**

3. Purse Seine Observer Coverage

Comprehensive observer coverage on purse seine vessels is a critical component of sustainable fisheries monitoring and management for tropical tunas. The WCPFC and IATTC have already implemented 100% coverage, and ICCAT has mandated the same for the Gulf of Guinea FAD closure. It is time for the IOTC to do the same. **ISSF strongly urges the IOTC to adopt 100% observer coverage on its large-scale tropical tuna purse seine fleets this year.** Where human onboard observers are not possible for certain fleets or vessel sizes, the Commission should immediately explore the option of electronic monitoring systems and establish guidelines for their use.

4. Gillnet Fisheries

Gillnet fisheries account for a substantial amount of tuna catches in the Indian Ocean, some of which use illegal large-scale pelagic driftnets. The SC noted that these fisheries have a substantial impact on marine ecosystems. Furthermore, they are inadequately sampled and monitored. ***ISSF urges the IOTC to follow the SC advice to freeze catch and effort by gillnet fisheries until sufficient information has been gathered to assess their impact.***

5. Data Gaps

Developing the most effective and robust conservation and management of tuna stocks requires access to the most comprehensive information available on fishing activity - including capacity, fishing effort and catch. ISSF is concerned that the level of reporting by IOTC members is very uneven. ***Significant improvements must be made, especially for the region's gillnet, artisanal and semi-industrial tuna fisheries. IOTC needs to diligently address these data gaps.***

6. Compliance. The IOTC already has one of the most transparent compliance processes among the five tuna RFMOs, and the recent meetings of the Compliance Committee have been marked with openness regarding discussing identified areas of non-compliance by CPCs. ***However, it is time for IOTC Members to take the next step and set clear milestones for improvement, and begin discussing how the Commission will respond to repeated and significant instances of non-compliance.***

7. Transshipment. ISSF notes with concern the areas of non-compliance with the IOTC transshipment program identified during the Compliance Committee in 2013. In addition, ISSF notes that the current drafting of Resolution 12/05 lacks a clear definition of large-scale tuna longline vessels (LSTLVs), which could be resulting in implementation loopholes, and that flag States are not currently required to report annually to the Secretariat the LSTLVs that they have granted prior authorization to transship at sea. ISSF is concerned that, if not properly monitored, at-sea transshipments can create a fertile environment for IUU fishing activities to go undetected.

Further, Resolution 12/05 does not define LSTLFVs explicitly, but the term "large scale" vessels in other Resolutions are defined as at least 24 m in overall length. ***ISSF urges the IOTC to make explicit the definition of LSTLFVs to ensure that longline transshipments are properly monitored by the Resolution.***

To better monitor non-LSTLFV transshipment activity, ***ISSF also encourages the IOTC consider expanding their transshipment measure to include the reporting of in-port transshipment by all vessels, as well as a requirement for the submission of transshipment declarations from all purse seine vessels.***

In sum, ISSF urges the IOTC Commission to review the scope and implementation of its transshipment measure in order to address potential gaps in its effectiveness and improve compliance by all CPCs with its provisions.

For further information please visit <http://www.ISS-FOUNDATION.org>