



ISSF POSITION STATEMENT

Presented during the 19th Session of the
Indian Ocean Tuna Commission
27 April – 1 May 2015

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The International Seafood Sustainability Foundation (ISSF) is a global partnership among the tuna industry, scientists 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: (1) reference points and harvest control rules, (2) vessel registries and fleet capacity, and (3) the management of FADs. This statement also addresses challenges specific to the IOTC, including improved compliance with RFMO obligations, elimination of albacore, striped marlin and longtail tuna overfishing, requiring sharks be landed with fins-naturally attached, and the need for timely and accurate catch and effort data and data on [bycatch](#).

1. **Harvest Control Rules (HCRs) and Reference Points.** IOTC Resolution 13/10 on Interim Biological Reference Points and a Decision Framework, in combination with Resolution 12-01 on Implementation of the Precautionary Approach, provides detailed guidance for the IOTC Scientific Committee (SC) in structuring Management Strategy Evaluations (MSE) of management approaches consistent with the Objectives of the Commission. **In order to further progress the adoption of reference points and HCRs ISSF:**
 - *Fully endorses the recommendations of the IOTC SC (SC17.27, SC17.28, SC 17.29, and SC17.310) to adopt reference points, particularly limit reference points at $0.2B_0$, based on biomass depletion models in the absence of sufficient data for MSY based reference points and to provide guidance to the SC regarding candidate risk levels of exceeding the recommended limit reference point.*
 - *Urges the Commission to take the necessary actions at its 2015 meeting to fully support the recommendation from the ongoing IOTC workshops promoting dialogue among scientists, managers and stakeholders related to the formulation of management objectives, and to provide assistance to developing CPCs.*
2. **Closed Vessel Registries and Management of Fleet Capacity.** In order to further progress the adoption of a closed vessel registry and the management of fishing capacity, ISSF:
 - *Urges the Commission to consider amending Resolution 03/01 to create a comprehensive closed vessel registry.*
 - *Encourages the IOTC to consider the outcomes of the 2014 ISSF workshop on the transfer of fishing capacity from developed to developing countries in any regional capacity management scheme. The workshop report can be accessed here. <http://iss-foundation.org/resources/downloads/?did=522>*

3. **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) to better monitor FAD usage and to establish a sound basis for their management in every ocean region. ISSF applauds those IOTC fleets that have been providing FAD data consistent with the Resolution 13/08 regarding FAD management and reporting. However, not all CPCs have begun to report these FAD data. **To progress the collection of FAD data and adoption of science-based FAD management measures, ISSF:**

- *Urges the Commission to encourage CPCs to provide these FAD data and also more detailed analysis of FAD usage patterns and catch per effort analysis by 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.*
- *Strongly supports the recommendation from the IOTC SC (SC17.23) and calls on the Commission to establish a working group on FADs to provide advice on the future management of both anchored and drifting FADs.*
- *Encourages all CPCs to implement as soon as possible the provisions in Resolution 13/08 regarding the use of non-entangling FADs designs to reduce the incidence of entanglement of bycatch species, using biodegradable material as much as possible, based on the principles outlined in Resolution. This is a critical step in the reduction of shark mortality and reduction of other ecosystem impacts in the Indian Ocean.*

4. **Tuna Stocks.** The IO stocks of **bigeye, yellowfin and skipjack** are not likely overfished and are not likely experiencing overfishing, and therefore no additional management measures are currently needed for these stocks. However, catches of the **albacore** stock have increased substantially since 2007, particularly by longliners. The current catch level of albacore was 38,297 tonnes in 2013 with an average of 37,525 tonnes over the most recent 5 years; however, there is substantial uncertainty in the catch and stock status estimates and the recent assessments have suggested that the stock was subject to overfishing. In 2014, the IOTC SC advised that other IO stocks, including swordfish, marlins and longtail tuna, all require management action be taken to ensure their long term sustainability.

- *ISSF urges the IOTC to adopt measures to prevent overfishing of these stocks and that efforts continue to improve catch and effort statistics to reduce uncertainty stock status for all species.*
- *In this regard, ISSF fully endorses SC 17.86 and 88 calling for the Commission to adopt needed revisions to Resolution 10/02 on Mandatory Statistical Requirements.*

5. **Sharks.** 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 are available, it is clear that the abundance of some species is declining. **To progress the adoption of science-based shark conservation and management measures, 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.*
- *Urges the Commission to take immediate steps to enforce the existing Resolution on shark finning through the Compliance Committee, and strengthen that measure by requiring that all sharks be landed with fins naturally attached.*

6. **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 again strongly urges the adoption of 100% observer coverage on 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 electronic monitoring systems and establish policies and guidelines for their use.*
7. **Gillnet Fisheries.** Gillnet fisheries account for a substantial amount of tuna catches in the Indian Ocean, some of which use prohibited large-scale pelagic driftnets, made illegal in 1992. The SC has noted that these fisheries have a substantial impact on marine ecosystems. They are also inadequately sampled and monitored.
 - *ISSF urges the IOTC to follow the SC advice to, as a matter of priority, collect and report data as mandated by the IOTC Resolutions 10/02 and 13/03 for all gillnet fleets to enable them to be assessed and incorporated into IO stock assessments, and consider freezing catch and effort by gillnet fisheries until sufficient information has been gathered to assess their impact.*
8. **Data Gaps.** Developing effective and robust conservation and management of tuna stocks requires comprehensive information available on fishing activity - including capacity, fishing effort and catch of tunas and sharks. ISSF is concerned that the level of reporting by IOTC members is very low. In 2014, only 39% of the required datasets were provided by CPCs.
 - *ISSF urges that significant improvements be made, especially for the region's gillnet, artisanal and semi-industrial tuna fisheries to diligently address these data gaps.*
9. **Compliance, VMS and IUU Vessel Lists.** While the [IOTC has one of the most transparent compliance processes](#), improvement are needed to strengthen its compliance assessment process and monitoring, control and surveillance tools. **ISSF urges the IOTC to:**
 - *Set clear milestones for improving compliance by requiring CPCs to submit a compliance action plan, and begin discussing how the Commission will respond to repeated and significant instances of non-compliance.*
 - *Develop a regional satellite-based vessel monitoring system because for many fleets implementation of and compliance with the existing VMS resolution is very low and it is not an effective MCS tool.*
 - *Reform [Resolution 11-03](#) so the IUU Vessel listing process is in line with best practices, including clear IUU listing and delisting procedures, adding common ownership as a criteria for IUU listing, and ensuring that flag States cannot veto IUU listing decisions for their own vessels.*
10. **Transshipment.** ISSF notes with concern the areas of non-compliance with the IOTC transshipment program identified during the 2014 Compliance Committee. In addition, ISSF notes that the current drafting of Resolution 14/06 lacks a clear definition of large-scale tuna longline vessels (LSTLVs), but the term "large scale" vessels in other Resolutions are defined as at least 24 m in overall length. This could be resulting in implementation loopholes. Further, flag States are not currently required to report annually to the Secretariat the LSTLVs that they

have granted prior authorization to transship at sea. If not properly monitored, at-sea transshipments can create a fertile environment for IUU fishing activities to go undetected. **In order to further progress better regulation of high-seas transshipment, ISSF urges the IOTC to:**

- *Make the definition of LSTLFVs in Resolution 14/06 explicitly at least 24m LOA to be consistent with other Resolutions.*
- *Expand Resolution 14/06 to include the reporting of in-port transshipment by all vessels, require the submission of transshipment declarations from all purse seine vessels, and require that flag States report annually to the Secretariat the LSTLVs that they have granted prior authorization to transship at sea.*
- *Urges the Commission to take immediate steps to enforce the existing Resolution on transshipment through the Compliance Committee to improve compliance by all CPCs with its provisions.*