



ISSF POSITION STATEMENT

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Indian Ocean Tuna Commission
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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) harvest strategies (also known as 'Management Procedures', which include Harvest Control Rules and reference points), (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 yellowfin, 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 Strategies.** IOTC Resolution 15/10 On Target and Limit 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 Harvest Strategies ISSF:**
 - *Urges the Commission to take the necessary actions at its 2016 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. To this end, a formal process for taking on recommendations from the dialogue process should be adopted in line with the recommendation of the IOTC SC SC18.18 and the 2nd IOTC Performance Review (Recommendation PRIOTC02.08(c)).*
 - *Urges the Commission to consider Management Strategy Evaluation (MSE) outcomes for skipjack and albacore tuna endorsed by the SC19 and adopt an appropriate Harvest Strategy that follows the decision framework, achieves targets and avoids breaching limits as set out in Resolution 15/10.*
2. **Closed Vessel Registries and Management of Fleet Capacity.** Excessive fishing capacity contributes substantially to [overfishing](#), the degradation of marine fisheries resources, the decline of food production potential, and significant economic waste. **In order to further progress the adoption of a closed vessel registry and the management of fishing capacity, ISSF:**
 - *Urges the Commission to implement the recommendations of the 2nd IOTC Performance Review on fishing capacity management (PRIOTC02.09 (a, b)) and, in so*

doing, encourages the IOTC to consider the outcomes of the 2014 ISSF workshop on the transfer of fishing capacity from developed to developing countries. The workshop report can be accessed here: <http://iss-foundation.org/what-we-do/areas-of-focus/capacity-management/>.

- *Urges the Commission to amend Resolution 03/01 to create a comprehensive closed vessel registry.*

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 notes further progress taken by the IOTC in establishing a FAD Working Group to provide advice on the future management of both anchored and drifting FADs. ISSF applauds those IOTC fleets that have been providing FAD data consistent with the Resolution 15/08 regarding FAD management and reporting. **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 as outlined in Resolution 15/08 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.*
- *Urges the IOTC FAD Working Group to coordinate, collaborate and fully consider the activities, research results and advice presented at other RFMOs regarding possible future management of both anchored and drifting FADs.*
- *Encourages all CPCs to implement as soon as possible the provisions in Resolution 15/08 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 2015 assessment of IO yellowfin determined that the stock is overfished and experiencing overfishing. A main reason for this negative assessment compared to the 2012 assessment is that catches by longline, gillnet, handline and purse seine increased substantially during the last three years. **The IOTC Scientific Committee projected that a 20% reduction in catch could rebuild the yellowfin stock to the MSY level with 50% probability by 2024.** The SC recommended that a rebuilding plan for the stock should be driven by an agreed Management Procedure (Harvest Strategy), including Harvest Control Rules, and based on the agreed interim target and limit reference points. It is vital for IOTC to end the overfishing of yellowfin and demonstrate that it can effectively manage the stocks under its purview.

- *ISSF urges the IOTC to adopt measures to reduce the catches of yellowfin by longline, gillnet, handline and purse seine by at least 20%.*
- *ISSF supports the SC recommendation that a rebuilding plan should be based on an agreed Management Procedure/Harvest Strategy.*
- *ISSF strongly recommends that the IOTC urgently continue development of an agreed Management Procedure (Harvest Strategy) for yellowfin tuna, that includes harvest control rules, and based on the agreed interim target and limit reference points.*

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 tuna fisheries. The WCPFC and IATTC have already implemented 100% coverage, and ICCAT has mandated the same for the Gulf of Guinea FAD closure. **It is past 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. 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 through the UN Resolution. 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 15/02 and 15/01 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.*
 - *Urges the Commission to adopt a CMM responsive to SC 18.12 regarding the use of large-scale driftnets, for which current practice is in contravention of Resolution 12/12.*
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 remains very low. In 2015, only 29% of coastal State CPCs and 46% of flag State CPCs provided mandatory statistics under Resolution 15/02.
- *ISSF urges the implementation of the 2nd IOTC Performance Review on capacity building (PRIOTC02.05) and data collection and reporting (PRIOTC02.03) so that significant improvements can be made, especially for the region's gillnet, artisanal and semi-industrial tuna fisheries in addressing data gaps.*
 - *ISSF endorses SC recommendation SC 18.19 regarding development of mechanisms to further encourage compliance with data reporting obligations under Res 15/01 and 15/02.*

- *ISSF continues to endorse and support the SC18.84 recommendation that work on joint analysis of operational catch and effort data from multiple fleets continue to be undertaken to further develop methods and to provide indices of abundance for IOTC stock assessments.*

9. **Compliance, VMS and IUU Vessel Lists.** While the IOTC has one of the most transparent compliance processes, improvements are needed to strengthen its compliance assessment process and monitoring, control and surveillance tools. **ISSF urges the IOTC to:**

- *Implement the recommendations of the 2nd IOTC Performance Review on MCS.*
- *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, best practice satellite-based vessel monitoring system because the current VMS resolution is not an effective MCS tool, and in addition, for many fleets implementation of and compliance with the existing VMS resolution is very low.*
- *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 and 2015 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.*