

SHILAT

Iran Fisheries Org.

Ministry of jahad-e-Agriculture

Islamic Republic of Iran

To: Dr. Christopher O'Brien  
Executive Secretary of IOTC

25 March 2019  
Date:  
No : 41176  
Encl:  
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**Subject: Feedback regarding compliance issues**

Dear Sir,

Respectfully, on the basis of the letter of Feedback (IOTC REF: 6628) from Ms.Riley Kim, vice chairperson of the Indian Ocean Tuna Commission 22<sup>th</sup> session of the IOTC, I would like to inform you that:

**-Has not implemented the requirement on marking on gears, as required by Resolution 15/04.**

According to the provisions of this resolution, in our national regulation of tuna fishing is mentioned in items of above IOTC resolution has been in started and it is totally addressed to stakeholders, purse seiners wholly implemented the regulation, so far however, artisanal vessels are confronting some limitations. IFO is currently effort to resolve the problems, although there is not any specific guideline available for this purpose and we welcome any experience in form of guideline for artisanal vessels.

**-On the implementation of resolution 11/04**, Iran fishing fleet unfortunately because of some problems due to lack of accommodations, we have not been able to install observers on board the vessels. In order to implementation effective observer program in ports we have joint with IOTC ROS pilot project which has developed according to IOTC Resolution 16/04. So our data and information are collected by monitoring in fishing harbours and landing centres. This activity is covering 10% of active vessels.

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**-On the implementation of resolution 15/02:** Iran Fisheries Organization (IFO) submitted catch and efforts and size frequency for artisanal and industrial fisheries by gear type and species on 21 June 2017, but on geographical position of vessels. According to a visit by IOTC experts to Iran, planning and coordination has been done to provide information to the secretariat based on IOTC format.

Regarding size frequency Iran has worked to improve the provision of size frequency data by increasing by sufficient and increasing the number of port samplers.

**-On the implementation of resolution 05/05 and 17/05:** As IFO mentioned in the implementation report shark species are protected by national regulations in the Iran and keeping of sharks is also prohibited. All sharks that are caught have to be released alive wherever possible. Hence, the catch and efforts of all the species including sharks have reported to the IOTC Secretariat, but lack of onboard observer the spatial catch and efforts did not report.

Iran submitted size frequency of important commercial species and made continuous efforts to improve its coverage.

**-On the implementation of resolution 12/06:** this resolution cover reducing of the incidental by-catch of seabirds in longline fisheries. As reported before, Iran does not have any industrial or semi industrial longline vessels. Only some small boats are working by longline gears in Iran territorial waters. So, this resolution is not applicable for Iran.

**-Implementation of the FAD management plan as required by Resolution 17/08:** On report of progress on implementation of FADs management plan: FAD operational program have been presented and FAD summarized information have been sent to IOTC secretariat.

**-Implementation of VMS as required by Resolution 15/03:** Iran Fisheries Organization has started the implementation of satellite base vessel monitoring system (VMS), according our managerial plan for VMS and submitted to the IOTC on 26 Jan 2016. IFO hope the artisanal fishermen will have enough cooperation in implementation of the system. For further information, VMS has been installed on board for industrial vessels, including tuna purse seiner in end of 2017.

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**-On the implementation of resolution 10/10:** There was no foreign vessel landing and transhipped of tuna and tuna-like fish products in Iran fishing ports during 2017. But tuna import to Iran is carried out by non-fishing vessels cold container in frozen form, however we are still unable to submit it in accordance to the required template.

**-Has not implemented the mitigation measures south of 25°S as required by resolution 12/06.**

This Resolution covers reducing of the incidental by-catch of seabirds in longline fisheries. As reported before, Iran does not have any industrial or semi industrial longline vessels. Only some small boats are working by longline gears in Iran territorial waters. So, this resolution is not applicable for Iran.

**-Implementation of Transhipments in port as required by resolution 17/06:** Not applicable, no transshipment has been occurred both at sea and in port during 2017.

Iran Fisheries Organization, as a responsible CPC, will continue every effort to fully comply with IOTC conservation and management measures.

Truly yours,

Sh.Kakoolaki  
Iran Commissioner to IOTC

