

WWF OCEANS PRACTICE

IOTC-2019-S23-NGO

WWF POSITION for the 23rd session of the Indian Ocean Tuna Commission (IOTC)

Hyderabad, INDIA
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Introduction:

Tuna are commercially important fish that contribute to global, regional and local economies and can be a source of livelihood and income to coastal communities. The tuna sector in the Indian Ocean ranges from coastal small-scale tuna vessels to large-scale distant industrial fishing fleets.

The scope and scale of tuna fishing effort in the Indian Ocean affects efforts to recover stocks and reduce bycatch (sharks, sea turtles and marine mammals). It also creates challenges for data collection to make robust and informed decisions.

WWF promotes ecosystem-based management as its preferred approach for managing tuna fisheries, working with more than 100 countries around the globe at local, regional and international level to advocate for improved fisheries, on policy, changes in fishing practices, transforming markets, sustainable and responsible trade, public awareness and education, and responsible consumption.

To achieve effective conservation, which is one of the overall objectives of the Indian Ocean Tuna Commission (IOTC), WWF recognizes the importance of cooperation among IOTC members, NGOs/CSOs, developing partners and key supply chain representatives of the tuna industry.

WWF's priorities for the 23rd IOTC:

- Improved conservation and management measures for all tuna species, in particular for yellowfin tuna and urgently adopting and implementing an effective yellowfin tuna rebuilding plan.
- Ensure transparent and traceable supply chains for tuna products.
- Reduce bycatch of non-target species through improved management.
- Recognition of the specific socio-economic contexts within the Indian Ocean region when adopting fisheries Conservation Management Measures within IOTC.

WWF calls on the IOTC Contracting Parties, Non-Contracting Co-operative parties and observers to further support the adoption and continued implementation of:

1. A strong Yellowfin Tuna rebuilding plan with an improved management of associated species

WWF urges parties to adopt and implement an ambitious effective rebuilding plan for Indian Ocean yellowfin tuna that takes into account all sources of mortality and offers a chance of YFT stocks to rapidly rebuild.

PROPOSALS: IOTC-2019-S23 PropB On an interim plan for rebuilding the Indian Ocean yellowfin tuna stock in the IOTC Area of competence (Rep. Korea), IOTC-2019-S23-PropK On an interim plan for rebuilding the Indian Ocean yellowfin tuna stock in the IOTC Area of Competence (EU), IOTC-2019-S23-PropS On an interim plan for rebuilding the Indian Ocean yellowfin tuna stock (South Africa & Maldives)

The yellowfin tuna stocks in the Indian Ocean are overfished and subject to overfishing. This is according to the stock assessment conducted in 2018 by the SC of the IOTC. However, the SC recently established that the yellowfin tuna catches have continued to increase by 3% despite the tuna recovery plan that was adopted. WWF is seriously concerned about the non-compliance to Resolution 18/01 by member states of the IOTC to meet the reduction target of 20%.

WWF is extremely concerned by the increase in yellowfin catch, and the repercussions not just on yellowfin tuna stocks, but also on associated key tropical and neritic tuna species, billfishes among others. There is an urgent need to adopt robust and mandatory and accountable measures to rebuild stock health. Specifically WWF recommends IOTC parties to:

- I. Take into account the advice of the IOTC Scientific Committee in 2018 to recover spawning stock biomass of BMSY by 2024, through at a minimum, a comprehensive five-year management plan which encompasses recovery for yellowfin tuna on a year-by-year basis reduction target, review and monitoring.
- II. Adopt a comprehensive five-year plan, and an overall catch reduction of at least 25-30% or more to allow spawning stock biomass to recover to a target of at least 50%.
- III. Revise the reduction targets (overall) contained in Resolution 18/01, as currently they do not allow effective rebuilding for the yellowfin tuna stocks. This includes by focusing on significant reductions in the industrial tuna sector in particular.

- IV. Implement a rebuilding plan for the Indian Ocean yellowfin tuna that includes removing any existing exemptions and includes reduction targets for all tuna fishing vessels operating in the IOTC area of competence.

2. A transparent compliance mechanism embed in IOTC-2019-S23-04 Proposal to amend App V of the CoC ROP and TOR (European Union)

WWF strongly urges IOTC CPCs to fully implement of the adopted Conservation and Management Measures. Particularly CPCs must increase the transparency of their compliance assessment process, including the collection and reporting of data as well as identified areas of non-compliance. WWF calls on the compliance committee to publicly disclose their report, including details regarding each CPCs' areas of non-compliance, with their performance against adopted CMMs and their recommendations or action plans to address such non-compliance. Lack of capacities can be then better identified and defined and prioritised for investment.

The work of the IOTC Secretariat in conducting many Compliance Support Missions throughout the region has resulted in notable and in some cases remarkable improvement in compliance with a number of measures. WWF urges all states which have benefited from this program to maintain or improve these levels of compliance and to work further on improving information returned to the Secretariat in order to facilitate effective monitoring and assessment of the tuna stocks.

3. Ambitious monitoring, control and surveillance (MCS) measures

Effective monitoring, control and surveillance (MCS) is a key element of sustainable and well-managed fisheries. Strengthened MCS capabilities are vital in order to combating illegal, unreported and unregulated (IUU) fishing which occurs on a large scale in the Indian Ocean region. IUU occurs across the sector, including in artisanal fisheries as well as in industrial fisheries, undermining social and economic benefits from healthy tuna stocks in Indian Ocean waters. In response to the many challenges WWF requests countries to:

- 3.1 Adopt the proposal IOTC-2019-S23-PropE Concerning the IOTC Record of Vessels Authorised to operate in the IOTC Area of Competence (Seychelles). This will allow the necessary time for CPCs to obtain an IMO number for eligible vessels that do not already have one and allowing vessels of less than 100 GT that are at least 12 metres in length overall, to obtain an IMO number as of 1st January 2020.
- 3.2 Monitor and report 100% transshipment activities or introduce a complete ban at Sea on transshipments proposal: IOTC-2019-S23-PropN on establishing a programme for transshipment by large-scale fishing vessels (Maldives) (Indonesia).

Clear rules for transshipment are essential for ensuring a strong, legal and verifiable seafood supply chain and reducing opportunities for illicit fishing products to be laundered during transport. Options for addressing issues relating to transshipments at sea should therefore range from 100% monitoring by fully-trained and certified human observers; electronic means such as cameras; or a combination of both on board both fishing and carrier vessels, to a complete ban of transshipment at sea, and limited only to ports. All transshipment events in the Convention area should also be

reported to the RFMO secretariat, regardless of event location or origin of transhipped catch¹. If all of the above requirements cannot be comprehensively and effectively met, transshipment at sea should be banned and limited to ports.

4. Continuing efforts for revision and adoption of robust harvest strategies for key tuna species by ensuring the adoption of proposal IOTC-2019-S23-PropP on a management procedure for yellowfin tuna in the IOTC Area of Competence (Australia et al)

WWF urges all parties to recognize that no fishery can be effectively managed in the absence of pre-agreed mandatory actions. The actions to be taken by fisheries management bodies in relation to fluctuations by stocks are defined by harvest control rules (HCR) which incorporate reference points as triggers for these actions. The IOTC adopted the HCRs in 2016 for skipjack tuna, and it is long overdue for them to be implemented. It is common knowledge that moderate changes in fishing effort can help maintain the stock in the 'green' or 'safe' range and avoid the current situation which will require long-lasting and difficult measures to rebuild the yellowfin fishery. For there is a need to further:

- Undertake a review of the interim limit reference points for yellowfin tuna adopted in 2015 (Resolution 15/10, On target and limit reference points and a decision framework) for effective strategies to be put in place allowing for limiting/reducing the fishing mortality (F) at or below the target reference points.
- For all member states to continue to work on resolution 15/10 and encourages to undertake similar exercise for other tuna species. WWF encourages the IOTC to continue to efforts and work on developing further the harvest strategies for key tuna species.
- Implement the HCRs as identified and adopted in Resolution 16/02 for skipjack tuna, considering that the stocks remain healthy.
- In addition, the Commission must recognize and ensure the SC advice and the urgent need for action to monitor the catches of skipjack from 2018-2020, recognizing the outcomes of the MSE process to feed into making appropriate revisions to ensure stock remains healthy.
- Use the outcomes of the MSE process to derive the harvest control rules for yellowfin, big eye, albacore and swordfish, in addition to skipjack.

Finally, it should be noted by member states that are considering certification of their fisheries as sustainable in order to ensure market access or improve profitability, that credible third party certification schemes require Harvest Control Rules and appropriate Reference Points to be implemented. It would be expected these states would give strong consideration to supporting their own fishing industries by actively supporting proposals contributing to achieving these outcomes.

¹ This position is also the IUU Watch position, for more information see paper on « EU IUU Coalition, *Achieving transparency and combating IUU fishing in RFMOs, 2019* »

5. Reach 100% observer coverage to improve reporting and reliability of scientific data in supporting the proposal IOTC-2019-S23-PropJ on amendments to Regional Observer Scheme (11/04) for adoption to increased observer coverage for industrial fleets (purse seine and longline) and provide a suitable timeline for CPCs to implement 100% observer coverage (PropJ)

Despite the requirement to do so, CPCs have not been able to achieve a fully functional observer data collection and observer scheme for tuna fisheries for their flag vessels. Considering the fact that data acquisition and validity is a primary concern it is essential that data quality gather by observers is ensured among each CPC for long-term sustainability of tuna stocks.

WWF encourages CPCs to focus on improving data collection, particularly in relation to the IOTC's Regional Observer Scheme (ROS) advancing with the use of electronic monitoring and reporting systems. The following may be pursued by CPCs for adopting at the Commission:

- Ensure that the on board observer coverage is subsequently increased from 5% to 100%, via different methods, such as human, or electronic or others (such as port sampling, self-sampling) as soon as possible.
- Ensure that all purse seine vessels (carrier and transshipment) have 100% observer coverage either via human or electronic monitoring systems asap and CPCs must make rigorous efforts to accomplish it.
- Prioritize the development of minimum standards for electronic monitoring systems (for instance including cameras) for IOTC, noting that WCPFC is drafting standards on EM and uptake of outcomes from WCPFC in IOTC would add value.
- Adopt the ROS minimum standard data fields as Recommended by the Scientific Committee of the IOTC.
- Encourage all CPCs to implement the regional observer scheme, with measures for observer safety and security (Resolution 11/04) and to report catches of tuna and tuna like species of vessels engaged in the high seas as appropriate.
- Implement recommendations PRIOT02.05 and PRIOT02.03 from the 2nd IOTC Performance Review on capacity building and data collection and reporting, respectively as agreed in Resolution 16/03.

6. Allocation Criteria and Quota Allocation

WWF stresses the need for effective monitoring from CPCs in order to ensure that they do not exceed their current catches. In particular, the maximum sustainable yield (MSY) for yellowfin tuna. There is an urgent need to limit the fishing effort for tuna stocks, implement the precautionary approach and develop an appropriate scheme for the adoption of management measures which represent genuine progress and recognize fair and equitable allocation scheme. For allocation, the following is recommended:

- Ensure the process is fair, transparent and equitable, in accordance with multilateral agreements.
- WWF reiterates for any allocation criteria/schemes to work, it must have a strong and transparent data collection process in place, which is monitoring over time, without which the allocation schemes, even though equitable and

fair, may not work and remain data deficient, under-reported and/or non-reliable.

We urge countries to find an agreement following proposal IOTC-2019-S23-PropA Allocation of fishing opportunities (Maldives et al) and proposal IOTC-2019-S23-PropM Establishing a quota allocation system for the main targeted species in the IOTC Area of Competence (EU).

7. Effective management of FADs in supporting proposal IOTC-2019-S23-PropG Procedures On A FADs Management Plan, Including A Limitation On The Number Of FADs, More Detailed Specs Of Catch Reporting From FAD Sets, And The Development Of Improved FAD Designs [...] (Seychelles) and IOTC-2019-S23-PropH Procedures On A FADs Management Plan, Including A Limitation On The Number Of FADs, More Detailed Specs Of Catch Reporting From FAD Sets, And The Development Of Improved FAD Designs [...] (EU)

The region lacks effective management of FADs in terms of effort and verification. It is critical to agree, at the IOTC level, precautionary science-based limits for the numbers of deployed FADs per vessel. WWF supports the use of limited numbers of instrumented FADs by purse seine fleets operating in the Indian Ocean but also urge the consideration of limiting overall effort, which the simple limitation of FAD numbers does not address. A broad and more comprehensive FAD management plan is needed which may be undertaken through the creation of a FAD working group to consider and advise on the issues of effective FAD management. We recommend and endeavour to see as a result of this commission meeting:

- WWF encourages the Commission to consider proposals which act to improve the management of overall FAD effort in conjunction with per vessel limits of FAD numbers and encourage the CPCs to establish precautionary measures in order to properly manage and monitor FAD fishing activity.
- Efforts to manage the environmental impact of FADs through non-entangling and biodegradable FADs should be considered in effective FAD management, and the research of fleets testing and deploying non-entangling and biodegradable FADs should be considered at the commission level.
- Develop, adopt and implement a comprehensive FAD management plan, including bycatch management and implementation of best management practices, and support the transition from non-entangling/biodegradable FADs.
- Support the recommendations of the FAD ad hoc working group, in addition to have traceability mechanisms established for all types of FADs deployed/used in the Indian Ocean.
- Support and collaborate with the BioFAD project and urge CPCs visiting or fishing on FADs clearly identified as experimental to report to their national scientists the status of FAD (and devices) and their activities on FADs (including any catch data).
- The FAD management plan should also include the transparency on supply vessels

8. The conservation of other vulnerable species in supporting the adoption and the implementation of IOTC-2019-S23-PropI On the Conservation Of Mobulid Rays Caught In Association With Fisheries In The IOTC Area Of Competence (EU) and proposal IOTC-2019-S23-PropO On the conservation of Mobula and Manta rays caught in association with fisheries in the IOTC Area of competence (Maldives)

WWF is committed towards the protection and conservation of sharks and rays, sea turtles, sea birds and marine mammals and recognizes the urgent support for proposals towards improving the protection and rebuilding for these species.

Many shark and ray species in the Indian Ocean remain subject to unsustainable levels of fishing mortality, which are coupled with significant lack of data (catch and biological). Certain species of sharks and rays require immediate protection, for instance short-fin mako, oceanic white tip, mobula rays among others. IOTC has previously recognised that CITES listed shark and ray species are caught in the Indian Ocean. IOTC members who are CITES Parties are obligated to implement the listings through conducting Non Detriment Findings (NDFs) issuing relevant permits and certificates (IOTC-2014-WPEB10-12). The IOTC committees and commission must assist CPCs by providing adequate information so that its members can adequately conduct NDFs. This is of particular importance given that catches may come from shared stocks. As with CITES listed species, sharks and rays listed within the appendices of the Convention on the Conservation of Highly Migratory Species of Wild Animal (CMS) are also caught within the IOTC area and CPCs are recommended to implement those listings.

WWF and TRAFFIC support the measures currently adopted by IOTC for sharks. However, there are further actions which need to be addressed by the IOTC at its 2019 round of meetings and into the future:

Bycatch mitigation

- WWF urges the Commission to adopt CMMs for bycatch mitigation and encourage CPCs to reduce mortality at source, and scale up successful pilots, such as the use of sub-surface gears in gillnet fisheries to reduce the mortality of sea turtles, cetaceans and sharks.

Sharks and Rays

- Adopt the CMMs proposed for Mobulid rays in the IOTC area of competence, considering there is enough scientific evidence of Mobulid rays coming in interaction with surface fisheries, and apply the precautionary approach and enable decision making process for 2019, rather than wait until 2020.
- Ensuring all sharks caught in association with tuna fisheries are landed with fins attached.
- WWF encourages CPCs to expedite the process of developing national plans of action for sharks and submit updated reports to the Commission and enhance regional cooperation and move towards the development of regional plans of action for sharks.

Sea Turtles

- Improve data reporting for sea turtles, in addition to reporting on shark species.
- Implement the SC advice on species reporting of sea turtles by making amendments to annexes II and III in resolution 15/01.

Marine Mammals

- Recognizing that preliminary estimates indicate that several thousand cetaceans may be caught as bycatch in the Indian Ocean tuna fisheries each year (IOTC-2018-WPDCS14-26_Rev1), the IOTC needs to urgently address this issue.
- It is also essential to ensure that any interactions with cetaceans are reported to the IOTC, in addition to sighting data from observer or equivalent data collection programmes in order to make use of best available data and encourage all member states of the IOTC and the Commission to support bycatch mitigation options and work with International Whaling Commission bycatch management expert group and report outcomes to the Working Party on Ecosystem and Bycatch.

Recommendation: Support the adoption and implementation of the proposal On the Conservation of Mobula Rays in the IOTC area of competence including all vessels below and larger than 24 m.

We further think that measures to sustainably manage fish stocks under the IOTC are missing and we urge CPCs to adopt the following:

1. Data collection for Small-Scale Fisheries:

WWF encourages the Commission to adopt via a Scientific Committee verified data collection alternate scheme, such as Crew based ‘observers’, electronic monitoring systems, mobile applications in addition to port sampling for vessels engaged in catch of tuna in the IOTC area of competence, where possible verifying the data from such sources.

Noting the lack of data from small-scale fisheries that are currently unable to deploy human observers, recognizing that the Scientific Committee agreed, and requested the WPDCS to evaluate the validity of alternative data collection tools, CPCs may explore potential opportunities, and where possible implement alternative data collection mechanisms to improve observer coverage through the use of crew as observers (i.e. self-sampling), electronic monitoring (e.g. cameras) and port sampling, and combination of these, as potential alternatives to on board human observer coverage for the collection of the minimum standard data fields for small-scale fisheries.

2. Reinforcing MCS tools:

- I. WWF encourages the CPCs to consider joint inspection schemes, as regards, reciprocal boarding and inspection schemes, also called “international joint inspection schemes” conducted by RFMOs recognized inspectors have a dual role to promote compliance and facilitate enforcement in deterring IUU fishing activities.
- II. Strengthen resolution 17/03 on the IOTC IUU vessel list to ensure vessel delisting is completely discouraged and cannot be vetoed and in including sanction to all person engaging or benefiting from IUU activities
- III. WWF encourages all member states in the Indian Ocean to better implement resolution X? port state and align national port states measures with the Port State Measures Agreement (PSMA) alongside other binding resolutions including recording catch and effort data (15/01), and implementation of IOTC record of authorized vessels (15/04)

Annex – I - The WWF contribution to the implementation of IOTC conservation and management measures

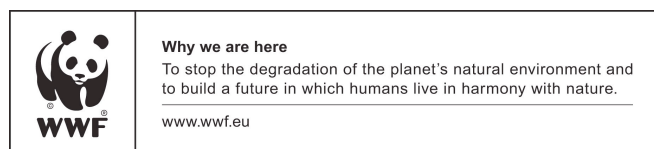
WWF has a long collaborative history in working with the IOTC Secretariat and its Member States, either individually or through the Commission. Since 2012, WWF has supported member states with data collection through crew-based observer programme, mobile data applications, electronic monitoring trials in small-scale fisheries targeting tuna and tuna like species, facilitated the improvement in management of tuna fisheries, undertaken capacity building workshops with Indian Ocean coastal states and continued to developed strategies and mitigation measures for reducing bycatch of sharks, sea turtles and cetaceans among others, often using a citizen science based approach. In 2017 WWF continued to support the efforts of some Coastal States to set up and operationalize an effective Artisanal Data Collection System and also supported the IOTC Secretariat in updating Conservation and Management Measures Manuals (A and B).

In recent times, WWF, has supported development of measures focusing on evidence based reporting for mobulids, setting-up trials on mitigation measures for reducing bycatch of cetaceans in tuna directed gillnet fisheries, engaging member states of the IOTC in replicating the approach of using ‘crew’ or ‘skippers’ as observers from data deficient fisheries, in addition to undertaking capacity building workshops and strategic meetings for enhancing regional cooperation, exchange visits where needed.

As the Commission continues to evolve toward effective management of their tuna and tuna-like species, WWF wishes to emphasize the attention of the member states to the following key issues:

In 2018, the Commission adopted the resolution 18/01 (on an Interim Plan for Rebuilding the Indian Ocean Yellowfin Tuna Stock in the IOTC Area of Competence) which was stipulated to undertake the effectiveness of the measures detailed in the resolution, taking into account all sources of fishing mortality and possible alternatives aiming at returning and maintaining biomass levels at the Commissions target level. The effectiveness assessed by the Scientific Committee in 2018 revealed the increased catches of both Yellowfin (overall 3% increase) and Skipjack tuna (overall 12% increase, from 470,029 t in 2016 to 524,282 t in 2017) which is greater than the target reference points (TRP) adopted in resolution 16/02 (On Harvest Control rules for Skipjack Tuna). Further, for yellowfin tuna, the Scientific Committee noted that the 2018 stock assessment indicates that the species remains to be overfished and subject to overfishing, in addition to the lack of effectiveness of the reduction targets.

In such a scenario, it is essential and of utmost urgency that the Commission undertakes robust decisions on adopting a recovery plan which has tangible, real-world implications, including the agreement to a harvest strategy for key tuna species including yellowfin and apply the harvest control rules (where applicable, for instance skipjack) to ensure the long-term sustainability and avoid skipjack tuna stocks declining to unhealthy levels.



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