

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

Subject: Feedback regarding compliance issues

Dear Sir,

20 Apr 2020
Date:
No : 1806
Encl:

Respectfully, on the basis of the letter of Feedback (IOTC REF: 6628) from Ms. Susan Imende, chairperson of the Indian Ocean Tuna Commission 23th 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 the resolution, gear markings has fully implemented for the Purse seine vessels where they are active in the IOTC area of competence. But, due to some problems in on board monitoring, it has not fully implemented for artisanal fishing vessels which are operating in the Indian Ocean. Iran Fisheries Organization (IFO) would be appreciated, if there are any practical experiences in IOTC Secretariat regarding to artisanal vessels.

- Has not fully implemented the VMS implementation plan, as required by Resolution 15/03.

As are reflected in IFO previous reports, the satellite based VMS system implementation, has started before and some vessels equipped by the system. According to current condition, the system has implemented for all purse seiner and also for some artisanal fishing vessels and they have not permission to sail without online VMS system. But due to some problems, especially broad sanctions against I.R.Iran and lack of access to satellite systems, spare parts, fixing and repair and etc., after equipping 40 artisanal fishing vessels the project has interrupted and stopped. According to national regulation (Port and Maritime Organization), IFO is going to equip all the vessels with AIS system and our technical group has intended to produce a complex package of VMS and AIS system. IFO hopes to continue this project up to fully implementation.

-On the implementation of resolution 15/02: IFO has submitted catch and efforts data for artisanal and industrial fisheries by gear type and species, on 30 June 2018, and Iran has sent the update catch and efforts data on 13 Aug 2018. Regarding to reporting catch and efforts by position, we has started and has coordinated with IOTC experts to provide information according to the resolution 15/02. Regarding to size frequency, IFO submitted the information of some important commercial species and preparing data are done continuously. So, IFO has tried to improve the coverage of the report by increasing number of port samplers.

-On the implementation of resolution 17/05: According to Iran Environment Organization regulation (competent authority for the species) all Shark species are protected and keeping of sharks in vessels or sale in markets are prohibited. According to the national regulations there is big penalty for each sharks on board. In addition sharks are not a target species, no licenses are issued for sharks catch and they have not any market. So, all sharks that are caught accidentally by the fishermen are released while they are alive (wherever possible). However, samplers receive some information during port sampling and interview by fishermen and the amount of catch and efforts of Sharks species has reported to the IOTC Secretariat. Because, lack of onboard observers, the catch and efforts information by geographical position and size frequency did not report.

-Has not provided the Report on progress of implementation of the FAO Guidelines and this Resolution as required by Resolution 12/06

The resolution is not applicable for I.R.Iran. According to the resolution, it covers reducing of the incidental by-catch of seabirds in longline fisheries. So, as the secretariat aware, Iran does not have any industrial or semi industrial longline vessels. Only some small boats are working by longline gears as a seasonal and temporal in Iran territorial waters.

-Has not reported FADs set by type to IOTC Standard, as required by Resolution 18/08.

A FAD Management Plan was submitted to the IOTC in 2014. This Plan has been revised in 2019 and FAD summarized information have been sent to IOTC secretariat according to the resolution 18/08.

-Has not decreased nominal catch of YFT, increase of 33% for gillnet fleet, as required by Resolution 18/01

Regarding offshore yellowfin gillnet capture raise in Iran, it is considerable that, there are differences on *offshore* definition between Iran and IOTC. According to Iran's definition, all the catches that come from beyond 24 miles, are recorded as offshore fisheries catch, while based on IOTC definition, offshore fisheries are recognized fisheries beyond EEZ waters. So, the amount of catch that reported by Iran is cover all the Yellowfin where are caught beyond the 24 miles and that causes indicated increase in yellowfin catch by gillnet method.

-Has not provided the Transshipments in port report as required by Resolution 18/06

Not applicable, no transshipment has been occurred both at sea and in port during year.

-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. Iran has focused for better implementation of observer scheme only in ports and port sampling to achieve the observer rate required by IOTC. So our data and information are collected by monitoring in fishing ports and landing centres. This activity is covering more than 10% of active vessels.

-Has not fully implemented the prohibition on shark finning, no legal reference provided, as required by Resolution 17/05.

According to supreme council of Environment resolution all Shark species are protected and keeping of sharks or any parts of them in vessels are prohibited. According to the national regulation there is big penalty for each sharks on board. Also all the resolutions including Res.17/05 are translated and communicated to the fishermen as IFO regulations. Fishermen who violate fisheries regulations will be referred to the fishermen infraction commission and they are sentenced to deprivation of fishing for a while.

-Has not fully implemented the IMO number requirement on eligible vessels, as required by Resolution 15/04

Port and Maritime Organization as responsible organization for IMO number affairs in Iran. In this regard, IFO had correspondence with the related organization; they informed us that according to IMO resolution A28/Res./078, all wooden fishing vessels has not obliged IMO number. We assumed those wooden fishing vessels are not needed to allocate such registration number. But based on new IMO resolution, we started to follow this case up with Iran Maritime Organization to find prepare solution for this issue and the process of work has been communicated to the fisheries Cooperatives and stakeholders. Surely, issuing IMO number, for all artisanal vessels, need time and the individual demand of each vessel. It is expected to be achieved to register all the IMO number of the vessels by 2021.

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

Turly yours,

P.Mohebbi
Iran Commissioner to IOTC



No. 236, Dr. Fatemi Ave, Tehran, Iran

Tel: (+98-21) 66941674 - 66943882

www.fisheries.ir

P.O.Box: 14155-6353

Fax: (+98-21)66941673

Email: ict@mail.fisheries.ir