



**24th Annual Session of the
Indian Ocean Tuna Commission
By Video Conference
02-06 November 2020**



IPNLF POSITION STATEMENT

The International Pole & Line Foundation (IPNLF) is a global charity that promotes the effective management of global tuna stocks, safeguarding the livelihoods they support. IPNLF promotes sustainable development through conservation of the marine environment and the empowerment of local coastal communities to conserve biodiversity, safeguard food security, support their local livelihoods, build climate resilience and eradicate poverty. IPNLF's mission is to empower responsible fisheries, which give back to the seas and the people that depend on them. We work across science, policy and the seafood supply chain to achieve this.

Despite unusual circumstances for this year's Annual Session of the Indian Ocean Tuna Commission (S24), IPNLF urges Members to continue addressing key challenges facing the Commission. Specifically, we encourage progress in the following areas:

- **Achieve further commitment and effective implementation of the stock rebuilding plan for yellowfin tuna, that will have a high likelihood of recovering the stock by 2024.**
- **Progress the allocation process in such a way that it recognises the legitimate rights of developing coastal States.**
- **Improve management of drifting fish aggregating devices (dFADs).**
- **Ban the use of supply vessels that are enabling overcapacity in the purse seine fishery.**
- **Accelerate the development and effective implementation of harvest strategies.**
- **Improve monitoring, control, and surveillance (MCS) and data collection.**



Rebuilding Plan for Yellowfin Tuna

Since first adoption of the IOTC yellowfin rebuilding plan in 2016 (Res 2016/01), the Scientific Committee has reported an increase in catch from some members, thereby negating the reductions made by others. Overall, ***the rebuilding plan has been ineffective while the fishery remains overfished and subject to overfishing***. We support calls for the IOTC to ***convene a Special Session in early 2021 to address concerns about the yellowfin tuna stock as soon as feasible***. The stock rebuilding plan must be effectively and equitably implemented as soon as possible to meet the IOTC's own scientific advice, and international best practice, by providing a high likelihood of rebuilding the yellowfin tuna stock by 2024. Next year, the Commission should also ***proactively address high levels of skipjack harvest***.

Progressing the Allocation Process

The Indian Ocean is home to several established small-scale coastal tuna fisheries. These ***developing coastal States' fleets compete with industrial fisheries for increasingly scarce tuna resources in support of their food security, livelihoods, local & national economies and way of life***. The sustainable development goals (SDGs) are focused on "leaving no one behind", alleviating poverty and providing equitable access to markets. Given current states of the key IOTC species, skipjack, yellowfin and bigeye tuna, we believe the time has come to expedite the process of a fair and equitable allocation of fishing opportunities. The Technical Committee on Allocation Criteria (TCAC), established in 2011, held its 6th meeting via video conference in September. Under leadership of the new Chair, Members agreed to the proposed thematic approach and supported the Chair proposing the next draft text to help bridge the gap between the two current proposals.

In view of the Covid-19 pandemic, IPNLF strongly supports a suggestion to hold a series of meetings in 2021 to also expedite these negotiations as a matter of priority.

We believe the allocation principles and criteria need to be further informed by socio-economic indicators, such as those which will be presented to delegates during S24. Decisions must be aligned with the UN Fish Stock Agreement and the UN Sustainable Development Goals (SDGs).

Strengthen dFAD management

The **excessive and non-transparent use of drifting fish aggregating devices (dFADs) continues to drive high catches of juvenile yellowfin and bigeye tuna**, representing a major contributor to the overfished state of the yellowfin tuna stock. These impacts from industrial purse seine fisheries have increased substantially since the first adoption of a rebuilding plan for yellowfin tuna in 2016. Transparency of dFAD operations should therefore be a priority issue so that these impacts can be effectively curtailed and managed.

The IOTC should ensure that dFADs are deployed, tracked and retrieved in full compliance with international legal frameworks. There is increasing evidence suggesting that a significant number of dFADs are lost or deliberately abandoned, many eventually washing up on beaches as litter or strandings in sensitive marine habitats, such as coral reefs and seagrass beds. Deliberate abandonment of dFADs likely constitutes infringements of MARPOL Annex V, the London Convention, London Protocol and the UN Convention on the Law of the Sea (UNCLOS) and should be prohibited. The rights of coastal states, many of them Small Island Developing States (SIDS), are infringed by non-compliance to international marine pollution law.

Full transparency is further required in dFAD operations. This should be achieved through the independent verification of dFAD ownership, deployments, positions, tracks and retrievals. This will also ensure compliance with dFAD reduction targets. From 2021 all dFAD components should be marked according to the **FAO Voluntary Guidelines on the Marking of Fishing Gear**,

while independent verification of FAD designs and construction materials should also be required prior to each deployment. **FAD ownership must be assigned at the time of deployment, and should not be allowed to change hands until the FAD is recovered and returned to port for responsible disposal.**

dFADs are causing significant damage to the broader **marine environment in the form of marine plastic pollution**. IOTC should **implement the 'polluter pays' principle** from 2021 to deal with the alarmingly high rate of negligent dFAD abandonment that creates an unfair burden on coastal states when dealing with the impacts of coastal pollution. dFAD owners should further be required to **recover all their dFADs at sea and evidence their responsible disposal** to minimise future damages to sensitive coastal ecosystems. IPNLF also calls for all deployed dFADS to be constructed of **100% biodegradable material** by June 2021.

Each dFAD can have up to 100m of netting and ropes attached to it underneath the water surface, to provide shelter to various marine organisms, thereby creating an artificial micro-ecosystem that also attracts tuna. Sharks, turtles and cetaceans often become entangled in this netting and ropes, leading to unknown large scale **entanglement mortalities of ETPs**. When lost, discarded or abandoned, the dFADs or parts of dFADs, can continue having ecosystem impacts through ghost fishing for decades. The netting and ropes hanging beneath FADs can also cause further significant damage to corals, seagrass beds and other sensitive marine ecosystems when washed ashore. Claims about the 'non-entangling' nature of dFADs do not always hold true when they wash ashore and become entangling. To address these issues, the IOTC is encouraged to **prohibit the use of any netting in FAD designs by June 2021**.

The banning of supply vessels will further help to address the impacts of dFADs and needs to be implemented as a priority.

IPNLF calls on the IOTC to **reactivate the FAD Working Group** as soon as possible to address these issues. IPNLF further calls for the following FAD management measures to be adopted as a priority:

1. Require FADs to be deployed and retrieved within the relevant international legal framework, including UNCLOS, the London Convention and MARPOL
2. Require fully independent verification of FAD ownership, numbers, positions, tracks, retrieval and disposal.
3. From 2021, implement fully transparent drifting FAD management frameworks where FAD owners are held fully accountable for the impacts of the FADs through a 'polluter pays' mechanism.
4. By June 2021, all FADs should have transitioned to being 100% biodegradable and no netting should be used on any FADs.

Continue Progress on Harvest Strategies

Significant progress was achieved with the adoption of the skipjack harvest control rule in 2016 (Resolution 16/02) and IPNLF encourages ongoing work to not only review the harvest control, but to also develop a model-based, fully specified management procedure in time for 2021 as stipulated in Res 16/02. The Commission should continue to **progress management strategy evaluation work on yellowfin, bigeye, and albacore to inform the development of future proposals for adoption**. Taking these steps on harvest strategies will safeguard these vitally important fisheries by implementing pre-defined management actions to maintain the stock at, or above, established target levels. We expressly encourage the development and adoption of harvest strategies with equitable reference points and control rules that recognise the social and economic dependence of coastal communities on fisheries harvesting all target tuna stocks.

Improving MCS and Data Collection

Improvements in monitoring, control, and surveillance (MCS) are necessary throughout the IOTC Convention Area. While progress has been made via IOTC Compliance Missions, further strengthening of measures will allow Members to better monitor fishing activities so that management actions can be evaluated and enforced. One measure that would improve both the data and the MCS of the fishery would be **the requirement for 100% observer coverage on large purse seine vessels** and large-scale longline vessels (human or electronic), as part of a Regional Observer Scheme.

Elsewhere, this is a widely accepted practice amongst purse seine tuna fisheries, and the largest purse seiners operating in the IOTC already carry observers. Observer coverage on longliners should also be addressed as a matter of priority, because catches from these vessels are difficult to verify, as are their additional impacts on endangered, threatened, and protected (ETP) species. Issues related to Covid-19 have promoted the use of electronic monitoring, but IPNLF cautions that coverage alone is not a solution, for which a Regional Observer Scheme could provide the most cost-effective means of making the most impactful use of achieved coverage.

IPNLF recognises the challenges unique to Indian Ocean tuna fisheries – chiefly that a large proportion of the Indian Ocean catch is taken by artisanal fisheries in developing coastal states. IPNLF calls on CPCs that currently do not meet the IOTC data requirements to **address data gaps as a matter of urgency**. Improved data will strengthen stock assessments and enable the development of more effective conservation and management measures while improving the overall management of shared tuna resources throughout the region. All feasible and practical efforts should be made to further incentivise compliance and to build the necessary fisheries management capacity in developing coastal States.

More comprehensive shark measures should be adopted in 2021 that at minimum include: a rebuilding plan for shortfin mako and oceanic whitetip sharks, require harvest strategy developments for all overfished shark species, and require all sharks to be landed with fins naturally attached. Additionally, the IOTC should prohibit the intentional setting around, or retention of mobulid rays.

Collaboration and coordination is required for the IOTC to live up to its commitment to responsibly manage the shared tuna resources in the Indian Ocean. While recent progress has been achieved, much more remains to be done.





ABOUT IPNLF

The International Pole & Line Foundation (IPNLF) works to develop, support and promote socially and environmentally responsible pole-and-line, troll and handline tuna fisheries around the world. IPNLF's ambition is to achieve a world of thriving fisheries that work in balance with nature by catching one fish at a time, therefore supporting coastal fisheries, including the people, communities, businesses and seas connected with them for generations to come. As a hub for sustainability focussed organisations, we use the influence of the market to forge change through practical fishery projects and stakeholder cooperation. IPNLF membership is open to organisations involved in the one-by-one tuna supply chain. Allied with our members, IPNLF demonstrates the value of one-by-one caught tuna to consumers, policymakers and throughout the supply chain. We work across science, policy and the seafood sector, using an evidence-based, solutions-focused approach with guidance from our Scientific & Technical Advisory Committee and Board of Trustees.

IPNLF was officially registered in the United Kingdom in 2012 (Charity 1145586), with branch offices in the United Kingdom, The Netherlands, The Maldives, Indonesia, and South Africa.

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Keep informed about the latest developments in one-by-one tuna fisheries through our [website](#) and by connecting with us on [Facebook](#), [Instagram](#), [Twitter](#) and [LinkedIn](#).

