

WWF Ocean Practice

IOTC-2021-SS4-NGO

WWF POSITION for the Special Session of the Indian Ocean Tuna Commission 24th Session (SS4)

Virtual Meeting

8-12 March 2021

WWF recognizes the unprecedented challenges presented by COVID-19 and its economic and social impact on the fishery sector in the Indian Ocean in 2020. IOTC Contracting Parties must adopt a rebuilding plan for the overfished Indian Ocean yellowfin tuna stock at the Special Session of the IOTC. The COVID-19 pandemic has had a severe impact on the economies and food security of coastal states. Contracting Parties must adopt a yellowfin tuna rebuilding measure that will be fair, resource-efficient and ensure resilient development. The IOTC must adhere to its own Resolution 12/01 on precautionary approach for management of Indian Ocean yellowfin tuna stocks, which is aimed at long-term sustainability to ensure food security and a resilient ecosystem.

WWF, along with other NGOs, has been strongly advocating the adoption of rebuilding and recovery plans for the Indian Ocean yellowfin tuna. However, the *'interim plan for rebuilding the Indian Ocean yellowfin tuna stock in the IOTC area of competence'* has been ineffective and failed to rebuild the stocks toward recovery.

WWF is requesting the Contracting Parties at the Special session to consider the three (3) critical elements to ensure robust and resilient yellowfin tuna fisheries in the Indian Ocean, which are the adoption of:

- A rebuilding plan for yellowfin tuna based on a biological target reference point that will ensure stock recovery
- Management measures to ensure FADs are effectively managed and their impact on juvenile yellowfin and other ETP species is minimized, and
- Measures to maintain the skipjack TAC at its 2018-2020 levels, and adopt multi-species tropical management measures that offers a holistic approach.

Specifically, WWF urges all Contracting Parties to consider the following recommendations at its special session of the commission planned to take place from 8-12 March 2021.

1.0 Adopt a robust and effective rebuilding plan for the Indian Ocean yellowfin tuna stock in the IOTC area of competence

The IOTC stock assessment undertaken for yellowfin tuna in 2018 determined that the stock was overfished and subject to overfishing. The most reliable data shows that the spawning biomass is 17% below the interim target reference point and fishing mortality is considered to be 20% above the interim target reference point. However, the scientific committee subsequently identified serious challenges with the stock assessment model used at the time, resulting in the 2015 data and management advice to be considered the most relevant. The IOTC Contracting Parties have been unable to deliver catch reductions as agreed under Resolution 19/01, which resulted in an increased overall catches of yellowfin tuna from several fishing sectors.

In 2020, IOTC scientific committee advised to reduce catches below estimated MSY (403,000 t), apparently as a stopgap measure to compensate for the failure to undertake a reliable stock assessment. The IOTC recommendation to fish at MSY level is equivalent to adding 10 purse seiners to the existing fishing fleet. The MSY-based limits are not a reliable target for rebuilding and will result in a substantially higher catch of almost 58,000 tons, whereas the target reference point-based stock recovery plan and limit reference points require a much lower level of catch (340,000 – 350,000 t). Without setting a biological target reference point, the MSY-based limits will seriously impact the long-term sustainability of stocks and may create or exacerbate food security issues for coastal states in the Indian Ocean. In this regard, WWF is calling for:

- 1.1** All Contracting Parties (CPCs) to call for **overall catch reduction of 15-20% from 2015 levels** to rebuild the Indian Ocean yellowfin tuna over a period of 10 years and covering two generations, in order to have a 50% probability of stock rebuilding by 2027.
- 1.2** The interim rebuilding plan to be effective, comprehensive and inclusive and shall remove any current or existing exemptions.
- 1.3** All CPCs to ensure the application of the 'interim rebuilding plan' includes all CPCs who have been reporting catches of yellowfin tuna from 2014-2019, regardless of vessel size and length, and area of operation.
- 1.4** All CPCs to ensure that the total allowable catch is limited to 340,000 – 350,000 MT for all gear types, in order to meet the overall catch reduction of 15-20% from 2015 levels.
- 1.5** To achieve the above catch limit, the following changes in reduction targets, as stipulated in Resolution 19, are proposed:
 - a) CPCs whose purse seine catches of yellowfin tuna reported for 2014 were above 5000 MT reduce their catches by 30% of 2014 levels,
 - b) CPCs whose gillnet catches of yellowfin tuna reported for 2014 were above 2000 MT to reduce their catches of yellowfin by 20% from 2014 levels,
 - c) CPCs whose longline catches of yellowfin tuna reported for 2014 were above 5000 MT to reduce their catches by 20% from 2014 levels,
 - d) CPCs whose catches of yellowfin from other gears reported for 2014 were above 5000 MT to reduce their other gears catches by 15% from 2014 levels.
- 1.6** Exceptionally, small island developing state CPCs that contributed less than 4% of the total yellowfin tuna catch of the Indian Ocean in 2017 shall reduce their purse seine catch by 15% of 2018 levels.

- 1.7** For fleets exempted from reduction targets, CPCs must be subject to catch reductions as follows:
- a) Purse seine average catches (2014-2019) of yellowfin were above 2000 MT to reduce by 15% from 2019 levels;
 - b) Longline average catches (2014-2019) of yellowfin were above 2000 MT to reduce by 10% from 2019 levels;
 - c) Gillnet average catches (2014-2019) of yellowfin were above 5000 MT to reduce by 15% from 2019 levels; and
 - d) Other gears average catches (2014-2019) of yellowfin were above 5000 MT to reduce by 10% from 2019 levels.
- 1.8** WWF requests CPCs to ensure that Resolution 19/01 paragraphs on over-catch of annual limit should be retained, however, CPCs must develop a robust monitoring mechanism for fair and transparent implementation and reporting.
- 1.9** CPCs must act with urgency to address multi-species impact of the fisheries on the marine ecosystems, especially on the juvenile mortality of yellowfin tuna, by ensuring additional measures are identified and implemented in support to the rebuilding plan taking into account all sources of mortality.

2.0 *Reduce the environmental impact of fish aggregating devices (FADs) through the use of electronic tracking, non-entangling and biodegradable FADs, to avoid juvenile mortality of yellowfin tuna and bycatch of non-target species such as sea turtles, sharks and cetaceans from industrial fishing*

The Indian Ocean region lacks effective management of FADs in terms of effort and verification. It is critical for Contracting Parties to be able to implement the provisions of Resolution 19/02 as early as 2021-2022. The Indian Ocean FAD-based purse seine fishery has the highest percentage of bycatch, 25%, of all purse seine FAD-based fisheries, compared to a global average of 16%.¹ The continued high level of juvenile tuna mortality, for a stock that is already overfished, could lead to slowing the recovery of the stock. Contracting Parties are urged to recognize the importance of reducing the environmental impact of FADs through the use of non-entangling and biodegradable FADs, and by adopting and implementing the best management practices (e.g., ISSF). For this purpose, the ad-hoc working group on FADs should deliver on its promise on Resolution 19/02, and ensure that all/any FAD measures are complementary to stock rebuilding for yellowfin tuna. WWF recommends the following:

- 2.1** All CPCs must aim to reduce yellowfin juvenile mortality associated with tuna fishing and its ecological impacts, as best achieved by purse seine vessels observing immediate area closures in high seas on the use of FADs for four months (120 days) between 0000 hours, 1 July and 0000 hours, 30 October each year.
- 2.2** The number of FADs as defined in Resolution 15/08 [superseded by Resolution 17/08, then by Resolution 18/08, then by 19/02], paragraph 4 will be no more than 150 active or inactive instrumented buoys in the water and 300 acquired annually instrumented buoys

¹ Is it good or bad to fish with FADs? What are the real impacts of the use of drifting FADs on pelagic marine ecosystems? Laurent Dagorn, Kim N. Holland, Victor Restrepo & Gala Moreno. FISH and FISHERIES, 2013, 14, 391–415

per purse seine vessel per year. An instrumented buoy shall be made operational only when physically present on board the purse seine vessel to which it belongs or its associated supply or support vessel, and the event shall be recorded in the appropriate logbook, specifying the instrumented buoy unique identification number and the date, time and geographical coordinates of its deployment.

- 2.3** All CPCs engaged in purse seine fishing operations and use of FADs must reduce the juvenile yellowfin mortality by 50% of 2019 levels and actively implement responsible measures as early as 1 January 2022, in addition to any other catch reduction measures adopted with respect to the amendments proposed in Resolution 19/01.
- 2.4** CPCs shall ensure full transparency of drifting FADs (dFADs) operations, including submission of all data transmitted by operational buoys to an independent third party in near real-time, including verification and ownership, numbers, position from deployment until retrieval, species composition recorded by its size and weight, and reporting set by set data.
- 2.5** To minimize the impacts of dFADs on ETP species and broader ghost fishing impacts, no netting should be permitted in dFAD designs and all the materials used in the construction of dFADs should be fully biodegradable by the end of 2021, and ensure that 100% of all FADs deployed be retrieved.

3.0 Maintaining TAC for skipjack 2018-2020; evaluating and adoption of multi-species tropical tuna management measures where the impact of a fishery (all gears combined) cannot decrease co-dependent stocks to below MSY

The international community has reiterated the urgent need to further integrate ecosystem approaches to fisheries conservation and management addressing bycatch, habitat destruction and overfishing². In IOTC, a tropical tuna CMM is essential to address the unsustainable race to fish where there is no mitigating impact on the other tropical tuna species. The impact of catches are exacerbated in tuna fisheries because the juvenile yellowfin tuna often school together with the same size, but mature skipjack tuna, and the species are thus caught together. The TAC for skipjack was set at 470,000 t for the period of 2018-2020, however, based on stock assessment outcome and applying the HCR specified in Resolution 16/02 TAC is 513,572 t for the period 2021-2023. According to the scientific committee it is believed that favorable environmental conditions could have been possible reasons for sustaining high skipjack catches, however, it is also noted that skipjack catches come in association with yellowfin tuna schools in dFADs, whose use has increased drastically, as reported by IOTC – Scientific Committee in 2018. In this context, WWF urges Contracting Parties to:

- 3.1** Adopt multi-species management reference points where the impact of a fishery (all gears combined) cannot decrease co-dependent stocks to below MSY.
- 3.2** Accelerate the process of an ecosystem-based harvest strategy approach for all tropical tuna with a drastic reduction of fishing effort, area closures, gear type provision, and evaluate the effects of spatial/seasonal closures.

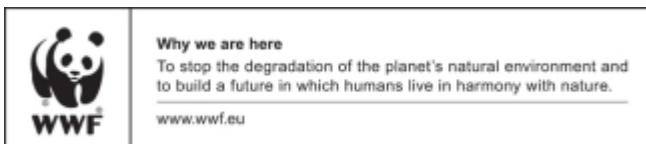
² See last Resolution adopted by the General Assembly on 10 December 2019. 74/18. Sustainable fisheries, including through the 1995 Agreement for the Implementation of the Provisions of the United Nations Convention on the Law of the Sea of 10 December 1982 relating to the Conservation and Management of Straddling Fish Stocks and Highly Migratory Fish Stocks, and related instruments

- 3.3** Recognizing that dFADs deployed in the purse seine fishery contribute to the overfished state of yellowfin tuna due to its high catch of juveniles, CPCs must ensure monitoring of impacts on other tunas, and evaluate implications on stock health due to high juvenile take through excessive use of FADs.

Conclusion

The state of tuna in the Indian Ocean is perilous, with three out of four commercial tuna stocks either overfished or worryingly close to that threshold. In addition to the ineffective management of tuna stocks, associated species and non-target species remain poorly regulated with very high bycatch rates (60,000 > mortality of dolphins and whales). While the IOTC Special Session will take place virtually due to the global pandemic, the pandemic does not excuse the CPCs of the IOTC from their responsibility to manage Indian Ocean tuna stocks through joint and collaborative efforts. Without meaningful engagement, discussion and dialogue, governments will not be able to attain an effective rebuilding plan for yellowfin tuna. Considering the majority of the catch from industrial fisheries ends up as canned tuna in the EU (<https://www.wwf.eu/?uNewsID=1909966>) and the UK, or sashimi in Japan and United States, WWF and our partners call for a rigorous management approach that recognizes tuna's vital role in food security, income generation and economic development for the marginalized communities of the Indian Ocean coastal states.

The markets cannot continue with the status quo and ever-increasing risk of stock collapse. While a market-wide ban on sourcing yellowfin from Indian Ocean is looming, IOTC CPCs cannot put off action for another year while fishing effort and capacity continues to increase. WWF calls on CPCs to adopt a robust and effective yellowfin tuna rebuilding plan while exercising a precautionary approach. WWF remains committed to the long-term sustainability of ocean resources and securing its vitality for food security, ocean resilience, ecosystem health and means of income generation and jobs for coastal communities.



For further information:

Umair Shahid
Indian Ocean Tuna Manager
SWIO-Sustainable Fisheries
Programme, WWF - MCO
Email: ushahid@wwf.org.pk
Mobile: +92 307 212 6393