



**Subject: Response to Feedback letters for 2019 and 2020**

Dear Chairperson,

I have the honour to transmit herewith the response from Madagascar to Feedback letters for 2019 and 2020, as required by the 17<sup>th</sup> Compliance Committee meeting.

Please accept, Ms Chairperson, the expression of my highest consideration.



**Annex: Response to Feedback letter regarding compliance issues in 2019.**

The CoC ACKNOWLEDGED the significant efforts made by Madagascar since CoC15 in addressing the concerns raised by the CoC in 2018, as well as the difficulties that Madagascar continues to face to fully implement a number of the CMMs adopted by the Commission, including:	<b>Responses</b>
<ul style="list-style-type: none"> <li>• Has not implemented the ban on large-scale driftnets, as required by Resolution 17/07</li> </ul>	The relevant regulatory text is now in the process of adoption.
<ul style="list-style-type: none"> <li>• Has not fully implemented the ban on shark finning, as required by Resolution 17/05.</li> </ul>	This measure is already provided for in the Fisheries Agreements with fishing companies; the regulatory text now in the process of adoption.
<ul style="list-style-type: none"> <li>• Has not reported nominal catch for all landing places for the coastal fisheries, as required by Resolution 15/02.</li> </ul>	For now, nominal catch reporting for the coastal fisheries relates to the Northern part of Madagascar as data collection at landing places has been introduced in the Northern part only. The Southern part of Madagascar is not yet covered due to financial constraints. Data provided on 30th December 2019.
<ul style="list-style-type: none"> <li>• Has not reported catch-and-effort for all landing places for the coastal fisheries, as required by Resolution 15/02.</li> </ul>	The same applies to catch-and-effort. For now, catch-and-effort reporting for the coastal fisheries relates to the Northern part of Madagascar as data collection at landing places has been introduced in the Northern part only. The Southern part of Madagascar is not yet covered due to financial constraints. Data provided on 30th December 2019.
<ul style="list-style-type: none"> <li>• Has not reported size frequency for the coastal fisheries, as required by Resolution 15/02.</li> </ul>	The same applies to size frequency. Size frequency reported in 2019 (final data provided on 30th December 2019) relates to the Northern part of Madagascar only. Southern part not covered by data collection due to financial constraints.
<ul style="list-style-type: none"> <li>• Has not reported size frequency for all species for the longline fisheries, as required by Resolution 15/02.</li> </ul>	Size frequency for all species (IOTC target species and sharks) for the longline fisheries provided on 30th December 2019, except for species with minimum quantities at landing.
<ul style="list-style-type: none"> <li>• Has not reported nominal catch for sharks for all gears, no reporting for all landing places, as required by Resolution 17/05.</li> </ul>	Nominal catch for sharks for all gears provided on 30th December 2019. As mentioned above, data submission relates to the Northern part of Madagascar only.
<ul style="list-style-type: none"> <li>• Has not reported catch &amp; effort for sharks to IOTC standard (aggregated by one species), as required by Resolution 17/05.</li> </ul>	Catch & effort for sharks reported by species for the coastal fisheries; aggregated by one species (blue shark) for the industrial fisheries (longline) being the only species found in the catch. Data provided on 30th December 2019.
<ul style="list-style-type: none"> <li>• Has not reported size frequency for sharks (aggregated by one species), as required by Resolution 17/05.</li> </ul>	Size frequency for sharks reported by species for the coastal fisheries; aggregated by one species (blue shark) for the industrial fisheries (longline)

	being the only species found in the catch. Data provided on 30th December 2019.
<ul style="list-style-type: none"> <li>• Has not reported data on interactions with sea turtles, as required by Resolution 12/04.</li> </ul>	For the coastal fisheries, no interaction with sea turtles has been reported by small-scale fishers at landing. For the industrial fisheries, we rely on data reported in the logbooks and catches landed at port. These data have shown no interaction with sea turtles.
<ul style="list-style-type: none"> <li>• Has not reported data on interactions with cetaceans, as required by Resolution 13/04.</li> </ul>	The same applies to cetaceans. No interaction with cetaceans has been reported by small-scale fishers at landing. For the industrial fisheries, we rely on data reported in the logbooks and catches landed at port. These data have shown no interaction with cetaceans.
<ul style="list-style-type: none"> <li>• Has not reported data on interactions with whale sharks, as required by Resolution 13/05.</li> </ul>	The same applies to whale sharks. No interaction with whale sharks has been reported by small-scale fishers at landing. For the industrial fisheries, we rely on data reported in the logbooks and catches landed at port. These data have shown no interaction with whale sharks.
<ul style="list-style-type: none"> <li>• Has not implemented a sampling scheme for artisanal landings, coverage not for all landing places, as required by Resolution 11/04.</li> </ul>	A sampling scheme for artisanal landings has been recently introduced. Data submissions will be effective from 2020.
<ul style="list-style-type: none"> <li>• Has provided the mandatory annual report on the statistical document programme and has declared exports of BET, but no declaration of MDG imports from CPCs, as required by Resolution 01/06.</li> </ul>	Madagascar does not import BET, as required by Resolution 01/06.

**Annex: Response to Feedback letter regarding compliance issues in 2020.**

The CoC ACKNOWLEDGED the difficulties that Madagascar continues to face to fully implement a number of the CMMs adopted by the Commission, including:	<b>Responses</b>
<ul style="list-style-type: none"> <li>• Has not implemented the ban on large-scale driftnets, as required by Resolution 17/07.</li> </ul>	The relevant regulatory text is now in the process of adoption.
<ul style="list-style-type: none"> <li>• Has not fully implemented the ban on shark finning, as required by Resolution 17/05.</li> </ul>	This measure is already provided for in the Fisheries Agreements with fishing companies; the regulatory text now in the process of adoption.
<ul style="list-style-type: none"> <li>• Has not reported nominal catch for all landing places for the coastal fisheries, as required by Resolution 15/02.</li> </ul>	For now, nominal catch reporting for the coastal fisheries relates to the Northern part of Madagascar as data collection at landing places has been introduced in the Northern part only. The Southern part of Madagascar is not yet covered due to financial constraints. Preliminary data provided on 30th June 2020. Final data will be provided on 30th December 2020.
<ul style="list-style-type: none"> <li>• Has not reported catch-and-effort for all landing places for the coastal fisheries, as required by Resolution 15/02.</li> </ul>	The same applies to catch-and-effort. For now, catch-and-effort reporting for the coastal fisheries relates to the Northern part of Madagascar as data collection at landing places has been introduced in the Northern part only. The Southern part of Madagascar is not yet covered due to financial constraints. Preliminary data provided on 30th June 2020. Final data will be provided on 30th December 2020.
<ul style="list-style-type: none"> <li>• Has not reported size frequency for the coastal fisheries, as required by 15/02</li> </ul>	The same applies to size frequency. Size frequency reported in 2020 (preliminary data provided on 30th June 2020) relates to the Northern part of Madagascar only. Southern part not covered by data collection due to financial constraints. Final data will be provided on 30th December 2020.
<ul style="list-style-type: none"> <li>• Has not reported size frequency for all species for the longline fisheries, as required by Resolution 15/02.</li> </ul>	Size frequency for all species (IOTC target species and sharks) for the longline fisheries provided on 30th June 2020, except for species with minimum quantities at landing. Final data will be provided on 30th December 2020.
<ul style="list-style-type: none"> <li>• Has not reported nominal catch for sharks for all gears, no reporting for all landing places, as required by Resolution 17/05.</li> </ul>	Nominal catch for sharks for all gears already provided on 30th June 2020 (preliminary data). As mentioned above, data submission relates to the Northern part of Madagascar only. Final data will be provided on 30th December 2020.
<ul style="list-style-type: none"> <li>• Has not reported catch &amp; effort for sharks to IOTC standard (no reporting for all landing places, for the longline fisheries data on sharks aggregated by one species (BSH)), as required by Resolution 17/05.</li> </ul>	Catch & effort for sharks reported by species for the coastal fisheries; aggregated by one species (blue shark) for the industrial fisheries (longline) being the only species found in the catch. Preliminary data provided on 30th June 2020.

	Final data will be provided on 30th December 2020.
<ul style="list-style-type: none"> <li>Has not reported size frequency for sharks (aggregated by one species - BSH), as required by Resolution 17/05.</li> </ul>	Size frequency for sharks reported by species for the coastal fisheries; aggregated by one species (blue shark) for the industrial fisheries (longline) being the only species found in the catch. Preliminary data provided on 30th June 2020. Final data will be provided on 30th December 2020.
<ul style="list-style-type: none"> <li>Has not reported data on interactions with sea turtles, as required by Resolution 12/04.</li> </ul>	For the coastal fisheries, no interaction with sea turtles has been reported by small-scale fishers at landing. For the industrial fisheries, we rely on data reported in the logbooks and catches landed at port. These data have shown no interaction with sea turtles.
<ul style="list-style-type: none"> <li>Has not reported data on interactions with cetaceans, as required by Resolution 13/04.</li> </ul>	The same applies to cetaceans. No interaction with cetaceans has been reported by small-scale fishers at landing and the industrial fisheries in the logbooks and at landings in ports.
<ul style="list-style-type: none"> <li>Has not reported data on interactions with whale sharks, as required by Resolution 13/05.</li> </ul>	The same applies to whale sharks. No interaction with whale sharks has been reported by small-scale fishers at landing and the industrial fisheries in the logbooks and at landings in ports.
<ul style="list-style-type: none"> <li>Has not implemented a sampling scheme for artisanal landings, coverage not for all landing places, as required by Resolution 11/04.</li> </ul>	Data on artisanal landings are currently being prepared and will be provided on 30th December 2020.
<ul style="list-style-type: none"> <li>Has not provided a response to the feedback letter, as required by the Commission.</li> </ul>	Response to the feedback letter provided with this Compliance questionnaire.
<ul style="list-style-type: none"> <li>Has not implemented the prohibition from intentionally fishing within 1 nautical mile of or interacting with data buoy, as required by Resolution 11/02.</li> </ul>	The relevant regulatory text is now in the process of adoption.
<ul style="list-style-type: none"> <li>Has not implemented the prohibition from taking on board a data buoy, as required by Resolution 11/02.</li> </ul>	The relevant regulatory text is now in the process of adoption
<ul style="list-style-type: none"> <li>Has not implemented the prohibition of intentionally setting any gear type on Mobulid rays, as required by Resolution 19/03.</li> </ul>	The relevant regulatory text is now in the process of adoption
<ul style="list-style-type: none"> <li>Has not provided the report on zero catches matrix, as required by Resolution 18/07.</li> </ul>	The zero catches matrix with final data will be provided later, on 30 <sup>th</sup> December 2020.
<ul style="list-style-type: none"> <li>Has not implemented the prohibition to retain on board, tranship, land, store Mobulid rays, as required by Resolution 19/03.</li> </ul>	The relevant regulatory text is now in the process of adoption
<ul style="list-style-type: none"> <li>Has not implemented the prohibition to gaff, lift by the gill slits/spiracles, punch holes through the bodies. Obligation to release alive, implementation of live release handling procedures of Mobulid rays, as required by Resolution 19/03.</li> </ul>	The relevant regulatory text is now in the process of adoption
Regional Observer Scheme, has indicated no vessel monitored and no coverage by gear type,	Madagascar Regional Observer Scheme completed six (06) deployments on purse-seine

as required by Resolution 11/04.	vessels: 392 observed days on board in 2019.
<ul style="list-style-type: none"> <li>• Has not provided information on actions taken domestically to monitor catches of blue shark, as required by Resolution 18/02.</li> </ul>	Monitoring of blue shark catches at landing in port for national vessels (longliners) : catch and effort and size frequency data collected by officers from the Institute (USTA)
<ul style="list-style-type: none"> <li>• Has not provided information on actions taken domestically to monitor catches &amp; manage fisheries of Striped Marlin, Black Marlin, Blue Marlin and Indo-pacific Sailfish, as required by Resolution 18/05.</li> </ul>	No action has been taken domestically so far, except catch monitoring through logbooks and at landing of longliners in ports.
<ul style="list-style-type: none"> <li>• Has not implemented the prohibition to retain on board, tranship, land, any Striped Marlin, Black Marlin, Blue Marlin, Indo-pacific Sailfish smaller than 60 cm Lower Jaw Fork Length, as required by Resolution 18/05.</li> </ul>	The relevant regulatory text is now in the process of adoption
<ul style="list-style-type: none"> <li>• Has not provided information on landing (2018) of foreign vessels in ports, as required by Resolution 05/03.</li> </ul>	Report on information on landings (2018) of foreign vessels in Madagascar port (Antsiranana) provided on 20 <sup>th</sup> February 2019 by UTSA.