



Ministry of Fisheries, Marine Resources, and Agriculture

Male', Republic of Maldives



No. 30-D/PRIV/2020/455

22 December 2020

Susna Imende,  
Chairperson,  
Indian Ocean Tuna Commission (IOTC),  
Le Chantier Mall,  
Victoria Mahé,  
Seychelles.

Dear Ms. Imende,

I take this opportunity to respond to the *Feedback Regarding Compliance Issues* of the Maldives (dated 04 December 2020) issued following the 17<sup>th</sup> Session of the IOTC Compliance Committee. The Committee raised fifteen outstanding issues which clarifications were provided for during the Session. However, as requested by the Commission Chair, I take this opportunity to put forward our comments and clarification in writing.

**1. Has no fully implemented the requirement on IMO number for eligible vessels, as required by Resolution 15/04.**

Measures have been put in place to ensure IMO numbers are reported to the secretariat in a timely and efficient manner. This information is now collected during the licensing stage for eligible vessels and are reported with information on AFVs. As of now the IMO number is not available for only one vessel. We have liaised with Maldives Transport Authority, responsible for vessel registration on this and we have been made aware that the gross tonnage that appear on the vessel registry is incorrect. We will engage with the Authority further over the coming few weeks to sort out this issue.

**2. Has not reported size frequency for the coastal fisheries to IOTC standard, data not available for all fisheries as required by Resolution 15/02.**

Maldives size sampling programme is implemented at key commercial landing sites as well as by fishermen samplers. Additionally, scientific observers also contribute data from observer trips and visits to landing sites. However, these data were not previously segregated by fleet and vessels that belong to the coastal fleet category (i.e. <24m and operating within the EEZ) were also included in the dataset. Steps have been taken to ensure future data are reported by fleet and 2018 data was reported by fleet, with a separate file for coastal fisheries dated 30.06.2019 (sent to secretariat@iotc.org, from the email mahusan@mrc.gov.mv). Further, Maldives implemented changes to the relevant regulation in 2019 and now requires fish exporters and processors to implement a sampling program in accordance with IOTC requirements.

**3. Has not reported size frequency for the surface fisheries to IOTC standard, less than 1 fish measured per metric ton, as required by Resolution 15/02.**

Maldives implements a size sampling programme at key commercial landing sites that are operated by the major fish processors and exporters in the country. Additionally, a limited number of fishermen samplers, mainly from small vessels that would fall in the coastal fleet category, also report size and catch and effort information. Additionally, scientific observers also contribute data from observer trips and visits to landing sites. Despite these efforts, it is sometimes difficult to achieve the required sampling effort of 1 fish/ton and other data stratification that is required by the resolution. Maldives has taken measures to increase sampling coverage, including requiring exporters and processors to implement a sampling program in accordance with the IOTC requirements. Sampling effort has also been boosted with the funding made available from the World Bank's Sustainable Fisheries Resources Development Project.

**4. Has not reported size frequency for longline fisheries, as required by Resolution 15/02.**

Maldives implements a size sampling programme at key commercial landing sites that are operated by the major fish processors and exporters in the country. Additionally, a limited number of fishermen samplers, mainly from small vessels that would fall in the coastal fleet category, also report size and catch and effort information. Additionally, scientific observers also contribute data from observer trips and visits to landing sites. Despite these efforts, it is sometimes difficult to achieve the required sampling effort of 1 fish/ton and other data stratification that is required by the resolution. Maldives has taken measures to increase sampling coverage, including requiring exporters and processors to implement a sampling program in accordance with the IOTC requirements. Sampling effort has also been boosted with the funding made available from the World Bank's Sustainable Fisheries Resources Development Project.

**5. Has not reported Nominal catch on sharks to IOTC Standard, data reported as discard for the longline only, as required by Resolution 17/05.**

Maldives baitboat fishery (pole-and-line and handline) tuna fisheries are one of the cleanest fisheries with virtually no catch or interactions with non-targeted, associated and threatened species. This has been documented in scientific papers and by observer trips, which has been reported to IOTC as well. Maldives logbook reporting system has provisions to report catch and interactions of non-targeted species, including sharks. Further, sharks, in addition to a number of other ecologically important and threatened species such as turtles and cetaceans, are fully protected by various regulations and prohibits catch, landing, retaining and harming of these animals and any shark that is incidentally caught are released or discarded and reported in the logbooks. Therefore, with reference to the Resolution 17/05, Maldives does not have nominal catch data on sharks to be reported to IOTC. Maldives also believes that this reporting does not apply to Maldives due to the protected status of the species and therefore, and should be exempted from reporting this information and being evaluated.

**6. Has not reported Catch and effort on sharks to IOTC Standard, data reported as discard with spatial information for longline fishery only, as required by Resolution 17/05.**

Maldives baitboat fishery (pole-and-line and handline) tuna fisheries are one of the cleanest fisheries with virtually no catch and interactions with non-targeted, associated and threatened species. This has been documented in scientific papers and by observer trips, which has been reported to IOTC as well. Maldives logbook reporting system has provisions to report catch and interactions of non-targeted species, including sharks. Further, sharks, in addition to a number of other ecologically important and threatened species such as turtles and cetaceans, are fully protected

by various regulations prohibits catch, landing, retaining and harming of these animals and any shark that is incidentally caught are released or discarded and reported in the logbooks. Therefore, with reference to the Resolution 17/05, Maldives does not have catch and effort data on sharks to be reported to IOTC. Maldives also believes that this reporting does not apply to Maldives due to the protected status of the species and therefore, and should be exempted from reporting this information and being evaluated.

**7. Has not reported Size frequency on sharks to IOTC Standard, as required by Resolution 17/05.**

Maldives baitboat fishery (pole-and-line and handline) tuna fisheries are one of the cleanest fisheries with virtually no catch and interactions with non-targeted, associated and threatened species. This has been documented in scientific papers and by observer trips, which has been reported to IOTC as well. Of the tuna fisheries, only longline fishery has shark bycatch in the Maldives. However, sharks are protected by law in the Maldives and thus retention of all species of sharks is also prohibited. All sharks that are caught have to be released alive whenever possible. Hence, nominal catch, and catch-and-effort data is non-existent for sharks caught in the Maldivian fishing fleet. Furthermore, it is not feasible for the longline fishing vessels to record size of sharks that are caught incidentally as sharks are immediately released, without landing on deck, when they are brought alongside the fishing vessel using de-hookers or line cutters. Maldives is exploring other ways of addressing this recurrent issue of “non-compliance”.

Therefore, with reference to the Resolution 17/05, Maldives does not have size frequency data on sharks to be reported to IOTC. Maldives also believes that this reporting does not apply to Maldives due to the protected status of the species and therefore, should be exempted from reporting this information and being evaluated.

**8. Has not provided the Report on progress of implementation of the FAO Guidelines and this Resolution to IOTC standard: some section of FAO guideline not covered, as required by Resolution 12/04.**

Similar to sharks, all species of turtles are also protected in the Maldives. In addition, due to the nature of fishing methods practiced in the Maldives turtle interactions are minimal. Use of nets (purse seine, trawl net and gill net) are banned in Maldives tuna fishery. Hence, the implementation of this Resolution and the subsequent reporting of the implementation of this resolution has always been of low priority to the Maldives. However, Maldives has taken measures to fully implement the guideline by imposing number of measures to reduce turtle motility and are implemented through tuna fishery. Maldives will continue the work to identify the shortcomings in the implementation of this Resolution wherever applicable to ensure compliance to this resolution.

**9. Has not fully implemented the observer scheme, only 2 BB trips monitored in 2019 coverage unknown, as required by Resolution 11/04.**

**10. Has not implemented the observer scheme, coverage at sea < 1%, as required by Resolution 11/04.**

**11. Has not provided observer report, as required by Resolution 11/04.**

Maldives initiated an observer program in 2014, which, due to the difficulties in recruiting observers and budget, did not yield sufficient results. Maldives has been implementing observer trips with an NGO and which allowed 2 trips to be monitored. As such, the number of trips monitored has increased and 54 trips were observed in 2019 (17 reported in 2019 and 37 trips reported in 2020).

As reported in our previous responses to feedback letters, we are in the process of establishing Electronic Monitoring for the local fishing fleet. For a fleet such as that operated in the Maldives, we believe this would be the most practical and cost-effective means of fulfilling the requirements

of the observer scheme. We take note here that the current Resolution on observer scheme does not recognize Electronic Monitoring as an alternative to human observers and we will be engaging with other members and the Secretariat through the various subsidiary bodies of the Commission to address this issue.

**12. Has not implemented the observer scheme for artisanal landing, as required by Resolution 11/04.**

Paragraph 4 of the resolution requires CPCs to monitor artisanal fishing vessel landings at the landing place by field samplers. Maldives has so far not provided such reports to IOTC. However, Maldives does have a size sampling program implemented at some key commercial landing sites which have landings from vessels that belong to the artisanal category (i.e. <24, and operating within the EEZ). However, it should be noted that such vessels, when landing to such a site, are required by law to submit the logbook records for that trip. Hence such trips are covered by logbooks. Additionally, Maldives has a sampler funded by the World Bank's Sustainable Fisheries Resources Development Project, that could cater to this requirement. Maldives will, in the future report the data from these samplers as required by the Resolution. Maldives would like to note that currently there is no specific format for the reporting.

**13. Has not provided the report on transshipments within Maldives as required by Resolution 19/06.**

Maldives has made changes to the reporting system to extract this information and Maldives would be able to provide this information for the year 2020.

**14. Has not provided the annual report (2018) of the Statistical Document programme, as required by Resolution 01/06.**

In order to objectively implement this Resolution, changes have to brought to the regulatory framework to mandate catch documentation for import of tuna and tuna like species into the Maldives. Ministry is working on a regulation to address this issue and it expected that such a regulation will be put in place in future. Information on the export of Bigeye tuna is provided as per the resolution 01/06.

**15. Has not provided the inspection report, as required by Resolution 16/11.**

Since March 2020, Maldives started implementing full-fledged PSMA operation system that cater both the PSMA and the IOTC PSM regulation. Inspection reports on foreign vessels that call into a designated port in the Maldives are communicated through IOTC ePSM application and this information is communicated with all parties as required by the resolution 16/11.

I also take this opportunity to reaffirm to you and the Secretariat of our commitments to the work of the Commission.

Yours sincerely,



Adam Ziyad  
Director General