



IOTC-2021-CoC18-FL08[E]-IND

Annex: Response to the Letter of Feedback regarding compliance issues.

The CoC ACKNOWLEDGED the difficulties that India continue to face to fully implement the following CMMs adopted by the Commission:	Response
 Has not adopted VMS for all vessels > 24 m and <24 m fishing high seas, as required by Resolution 15/03. 	India has only four exploratory longline vessels in the IOTC RAV. All these four Authorized Fishing Vessels (>24m) are Government owned and Government (Fishery Survey of India) operated exploratory survey vessels, following government monitoring protocols. No fishing vessel of <24 m, has since been authorized by India for fishing in the high seas for that VMS to be adopted.
Has not provided the VMS implementation plan, as required by Resolution 15/03.	All 04 Authorized Fishing Vessels of India are Government owned and Government (Fishery Survey of India) operated exploratory survey vessels, following government monitoring protocols, the details of the same were already submitted to the IOTC on 21 Aug, 2020. Any commercial fishing vessel if authorized by India in the future, shall be subject to VMS monitoring system, as per IOTC Resolution 15/03.
Has not reported Catch & Effort for Coastal fisheries, as required by Resolution 15/02.	India vide communication dated 30.06.2020 submitted the annual catch and effort data on for coastal fisheries segregated in to FAO areas 51 and 57, as per the reporting requirements listed in the relevant IOTC Resolutions.
 Has not fully reported Size Frequency for Coastal fisheries to IOTC standard, as required by Resolution 15/02. 	India had submitted the size frequency for coastal fisheries vide communication dated 30.06.2020.
 Has not reported data regarding Sharks – Nominal catch to IOTC standard, as required by Resolution 17/05. 	India had submitted the annual nominal catch regarding sharks vide communication dated 30.06.2020 as per the reporting requirements listed in the IOTC Resolution 17/05.
 Has not reported data regarding Sharks – Catch & effort, as required by Resolution 17/05. 	India had submitted the catch & effort data regarding sharks vide communication dated 30.06.2020 as per the reporting requirements listed in the IOTC Resolution 17/05.
 Has not reported data regarding Sharks – Size frequency, as required by Resolution 17/05. 	India had submitted the size frequency data of sharks vide communication dated 30.06.2020 However, India will furnish additional size frequency data of sharks if there are some shortcomings in the data.
 Has not provided the data on interactions with marine turtles on coastal fishery, as required by Resolution 12/04. 	This information was provided by India vide communication dated 19.04.2021
Has not provided the data on interactions with Cetaceans, as required by Resolution 13/04.	This information was provided by India vide communication dated 19.04.2021
Has not provided the data on interactions with Whale Sharks, as required by Resolution 13/05.	This information was provided by India vide communication dated 19.04.2021
• Has not provided Observer reports, as required by Resolution 11/04.	India have only 4 exploratory research vessels in the IOTC RAV. Atleast one scientist from the Fishery Survey of India invariably participates in the voyages of these vessels, ensuring 100% observer coverage.

	In the IOTC Observer report templates, we could find templates only for GN - Large mesh Gillnet (Industrial); LL – Drifting longline (over 1800 hooks - Industrial); PL - Pole and Line (Artisanal) and PS - TunaPurse seine (Industrial). As our vessels in the IOTC Record of Authorised vessels (RAVs) i.e., 04 exploratory longliners do not operate the abovementioned 04 fishing gears and operating only LLEX – Drifting longline (Exploratory), we could not furnish the observer reports.
• IUU Listing – Has one vessel retained on the IOTC IUU list in 2019, Resolution 18/03.	Nil report have already been submitted to the IOTC as per the calendar programme, 2020.
• Has not provided the report on zero catches matrix, as required by Resolution 18/07.	This information was provided vide communication dated 19.04.2021