



## Global Tuna Alliance Statement to the 25<sup>th</sup> Session of the Indian Ocean Tuna Commission

### Background

Indian Ocean yellowfin tuna is overfished with overfishing occurring. The Indian Ocean Tuna Commission (IOTC) held an abbreviated remote meeting in November 2020 and agreed to hold a special session from 7<sup>th</sup>-11<sup>th</sup> March 2021 to discuss rebuilding yellowfin. Unfortunately, this meeting ended with no agreement on rebuilding and the 25<sup>th</sup> Session of the IOTC remains the last realistic chance for delegates to demonstrate to the market that they are serious about tuna sustainability.

The Global Tuna Alliance urges the Commission to comply with the IOTC's mandate, including its commitment to the precautionary approach outlined in Resolution 12/01, and Resolution 19/01 in a manner that will immediately end overfishing and rebuild the yellowfin stock in two generations.

We also call for the Commission to accelerate action on developing comprehensive, precautionary Management Procedures and agree on permanent Limit and Target Reference Points for tropical and temperate tunas, particularly yellowfin, in 2022.

### Recommendations

#### 1. CPCs should agree a resolution that specifies how the yellowfin stock could be rebuilt in two generations

The resolution should apply to all fishing vessels targeting tuna and tuna like species in the Indian Ocean regardless of the length of the vessel and area of operation. Since the beginning of the yellowfin tuna rebuilding plan, the criterion of application has been maintained. However, we believe that this is one of the main weaknesses of the plan, since it allows those countries that exceed the catch limits established by the plan, to be exempted from the application of the reductions if they have fishing vessels <24m LOA operating within its EEZ. In those cases, the reduction will not be applied.

There needs to be an effective reduction in catch. Fishing Mortality in 2017 was 20% higher than the target reference point of Fishing Mortality at MSY. Therefore, a resolution should achieve a reduction in fishing mortality of 20% to meet the target reference point of FMSY. This equates to roughly a catch of 341,000 tons (or a 16.7% reduction in catch)<sup>1</sup>.

There needs to be a collaborative approach taken. We are pleased to see the EU and Maldivian delegations working collaboratively on a joint-proposal and urge them to recall the mandate of the IOTC, and in particular the precautionary approach.

The issue needs to be taken seriously. We encourage delegates to discuss proposals in advance of the meeting, and request the IOTC secretariat provide detailed simulations of proposals in advance of the meeting. Furthermore, we request the IOTC secretariat schedules adequate time to discuss yellowfin rebuilding proposals.

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<sup>1</sup> Based on data from SC21 (2017 catch 409.6kt)

**2. Accelerate action on developing comprehensive, precautionary Management Procedures and agree on permanent Limit and Target Reference Points for tropical and temperate tunas, particularly yellowfin, in 2022.**

Management procedures provide a pre-agreed framework to facilitate efficient, science-based decision-making to achieve a long-term vision for the stock and fishery. A yellowfin management procedure will provide IOTC with the tools necessary to rebuild the population and eventually maintain a sustainable, profitable, and predictable fishery.

**3. Establish the ad-hoc Working Group on Electronic Monitoring (EM) Program Standards recommended by the IOTC Science Committee and develop EM program minimum standards by 2022. Require 100% observer coverage (human and/or electronic) in industrial tuna fisheries, including all those engaged in at sea transshipment, by 2024.**

The IOTC has failed to take account of best practices for observer coverage for longline, purse seine and other gear types. Resolution 11/04 only requires 5% observer coverage irrespective of the gear and/or area of operation. The IOTC lags far behind other RFMOs observer coverage rates, particularly for longline and large-scale purse seine fleets. Observer coverage must be increased to strengthen data collection, including of rare species interactions and events, and to ensure rigorous compliance monitoring. While the IOTC has endorsed minimum electronic monitoring (EM) standards for purse seine vessels, the Commission has not adopted them for all gear types or carrier vessels.

**4. Amend Resolution 16/11 to prioritize vessels for inspection in port and expand the measure to include ports of CPCs that are outside of the IOTC Convention Area.**

Since 2009, the Port States Measures Agreement (PSMA) has set the standard for port States to detect and investigate IUU fishing, report on their inspections, and share data to prevent illegally caught fish from entering the seafood supply chain.

The IOTC adopted a Resolution on Port State Measures in 2010, which was amended in 2016. The current Resolution is 16/11 on Port State Measures to Prevent, Deter and Eliminate IUU Fishing. This resolution does have limitations (e.g., the IOTC exclusion of ports by CPCs that are outside of the IOTC Convention Area<sup>2</sup> which undermine the global reach of port State measures; provide potential safe havens for IUU vessels, operators and vessels that support IUU fishing activities; creates an unlevel playing field for those States that are required to implement stronger port controls; and undermines the efforts of these States and RFMOs nationally and regionally.

**5. Overarching Asks of Tuna RFMOS**

In addition to the above specific asks of the IOTC, the Global Tuna Alliance is calling for all tuna RFMOs to:

**Observer Safety**

- Implement the International Observer Bill of Rights (IBOR). Alongside the IOBR, regulatory authorities (flag states and coastal states) and their respective observer programs should support the adoption of the WCPFC mandatory observer safety reforms by all tuna RFMOs.

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<sup>2</sup> H. Koehler. 2021. Port State Measures in Tuna RFMOs: Benchmarking RFMO Port State Measures Against the 2009 FAO PSMA and Identifying Gaps. ISSF Technical Report 2021-09. International Seafood Sustainability Foundation, Washington, D.C., USA

### **FAD Management Best Practices**

- RFMOs should adopt the measures identified in the GTA's [position](#) on better FAD Management. While not comprehensive, these measures are critical to ensuring that at-sea FAD fishing is better-managed and more transparent.

### **Fins Naturally Attached (FNA)**

- Strengthen existing shark-finning measures by requiring that all sharks be landed with fins naturally attached and ensure adequate surveillance of compliance exists.

### **Biodiversity Beyond National Jurisdictions (BBNJ)**

- RFMOs to actively participate in the upcoming rounds of BBNJ treaty negotiations to ensure the complementarity of their strategies with the area-based management tool (ABMT) and environmental impact assessment (EIA) ambitions of the BBNJ treaty.
- Tuna RFMOs to implement integrated, ecosystem-based management (IOM/EBM) to replace reliance on single sector management in isolated silos and the limited focus on the impacts on non-target, associated or dependent species.

### **Allocations**

- Allocation is a critical component of fisheries management. While RFMOs have defined priorities and values, they have not systematized their application to resource allocation. As such, the actual allocation of tuna resources is shaped more by politics, rather than principles. We call on each RFMO to move from the current system of opaque allocations (where they exist) based on political negotiations to a systematic and transparent system of fair and equitable fishing opportunities to all participants according to international law.