

**SHILAT**

Iran Fisheries Org.

Ministry of Jihad-e-Agriculture

Islamic Republic of Iran

To: Dr. Christopher O'Brien  
Executive Secretary of IOTC

**Subject: Feedback regarding compliance issues from Iran**

14, Nov, 2022  
**Date:**  
**No :** 40238  
**Encl:**

Dear Sir,

Respectfully, on the basis of the letter of Feedback (IOTC Reference: IOTC2021-117) from Ms. Kim Jung-re, chairperson of the Indian Ocean Tuna Commission. I would like to reply as follows:

**-Has not implemented the requirement on marking on gears, as required by Resolution 15/04.**

Regarding on marking on gears for vessels operating in IOTC competency, it is not possible to implement the gears marking scheme at the moment. However, if there is a successful experience by other countries in this regard, we have been informed so that the necessary planning can be done in this regard while examining its aspects"

**-Has not decreased nominal catch of YFT, as required by Resolution 19/01**

In relation to yellow-fin tuna fisheries management program in Iran, we would like to inform you that; Iran fisheries organization has put reduction of yellowfin Tuna on its agenda and has announced it to regional offices in provinces in southern coastal area and stakeholders. This measures have been taken up to now, such as; restriction of gillnet length, shifting fishing methods in some vessels from gillnet to long line, lessening of catch season periods, monitoring of landings, data collection system improvement..., with the purpose of reducing YF fishing effort and catch amount, resulted in YF catch amount reduced in 2020 in comparison to 2019. Noting that Fisheries in Islamic Republic of Iran is mostly in form of artisanal and Sustainable Small-Scale Fisheries for family subsistence and the target community has a certain cultural and social level. Meanwhile FAO emphasized on supporting these types of activities among local communities. Any alteration and remarkable catch reduction in such communities is extremely complicated and complex task with numerous socioeconomic aftermaths that critically restricts small scale fisheries subsistence. In comparison with large scale fisheries, regulatory restrictions for SSF with numerous stakeholders are an absolutely hard assignment, which will achieve the desired results in a gradual schedule over the next few years.

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**-Has not reported catch & effort and size frequency to IOTC Standard for the coastal and surface fisheries, as required by Resolution 15/02.**

Iran Fisheries Organization (IFO) submitted catch and efforts data for artisanal and industrial fisheries by gear type and species. But on geographical position of vessels we started and coordination with IOTC experts to provide information and will be implemented according to the resolution 15/02.

Regarding size frequency, IFO has submitted a comprehensive size data report to IOTC Secretariat on coastal species. It includes inter alia COM, LOT and KAW by gear, month and time-area. For the first time we identify and report size frequency for each coastal species in the breakdown of 24 fishing grounds (Geographical position). The data format is as IOTC data collection format for coastal fisheries. We updated the Persian Gulf and Oman Sea's marine Map to meet the IOTC standards. All Iran's fishing grounds have got the precise coordinate. But regarding the size frequency for surface fisheries, we had a full coverage in terms of 1 fish per metric tonnes, sampling coverage, and also reporting by all available fishing gears such as: gillnet, long line and purse seine fishery. For purse seine the data reported by: month, gear and grid. For gillnetters, the size-frequency is submitted by IOTC standard but not grid area.

**-Has not reported catch & effort and size frequency on sharks to IOTC standard, as required by Resolution 17/05**

According to Iran Environment Organization regulation (competent authority for the species) all Shark species are protected and keeping of sharks in vessels or sale in markets are prohibited. According to the regulation there is big penalty for each sharks on board (5000 \$ for each shark carcasses). In addition sharks are not a target species, no licenses are issued for sharks catch and they have not any market. So, all sharks that are caught accidentally by the fishermen are released while they are alive (wherever possible). However, samplers receive some information during port sampling and interview by fishermen and the amount of catch and efforts of shark's species has reported to the IOTC Secretariat. Because, lack of on board observers, the catch and efforts information by geographical position and size frequency did not report.



**-Has not implemented the Regional Observer Scheme, No. of vessels monitored and coverage by gear type, as required by Resolution 11/04.**

Iran fishing fleet unfortunately because of some problems due to lack of accommodations, we have not been able to install observers on board the vessels. Iran has focused for better implementation of observer scheme only in ports and port sampling to achieve the observer rate required by IOTC. So our data and information are collected by monitoring in fishing ports and landing centers. This activity is covering more than 100% of active vessels.

**-Has not implemented the 5% Mandatory coverage at sea (All vessels), as required by Resolution 11/04.**

As we reported before and IOTC experts visited Iranian dhows, the artisanal vessels have not enough space and facilities to accommodate the observers as an officer. In addition any experts have not enough interests to sail by these types of vessels because of low level facilities and longtime navigation. So, these are main difficulties that the schema has rest up to now. In order to solving the problem, Iran has focused on port monitoring and observers do related sampling on ports. The schema has tried to cover the data requirements of IOTC. In conclusion, Iran has implemented observer schema on ports and all data and information are collected by monitoring in fishing ports and landing centres by covering more than 10% of active vessels.

**-Has not fully implemented the IMO number requirement on eligible vessels, as required by Resolution 15/04.**

Despite numerous meetings on allocating IDs for fishing vessels and the decision of the Fisheries Management to take action, unfortunately due to the continued corona pandemic and the spread of various strains of the virus in Iran and consequently the severe involvement of fishing areas in Iran with this disease, a large part of group activity ceased and available manpower plummeted. Due to this, the progress of the programs was disrupted and therefore no progress was made in this area. However, Iran is committed to registering the vessels if conditions improve.

**-Has a vessel listed in the IOTC IUU Vessels List, as required by Resolution 18/03.**

Regarding the Koosha 4 vessel, I would like to announce that in the last virtual meeting of CCAMLR, which was held in October 2021, Iran was invited as an observer, and the Iran's statement about Koosha 4 was read out loud and the relevant documents were sent to the secretariat of that commission after the meeting in order to circulate between the member states for consideration and making the final decision on removing koosha 4 from the NCP-IUU vessels list of the commission. Right now we are waiting to hear the final decision by the CCAMLR secretariat.

Iran Fisheries Organization, as a responsible CPC, will continue every effort to fully comply with IOTC conservation and management measures.

Sincerely,



M. Beheshtian  
Iran Commissioner to IOTC (Interim)