

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ



Ministry of Fisheries, Marine Resources, and Agriculture

Male', Republic of Maldives

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16 March 2022

Kim Jung-re
Chairperson,
Indian Ocean Tuna Commission (IOTC),
Le Chantier Mall,
Victoria Mahé,
Seychelles.

Dear Ms. Kim Jung-re

I take this opportunity to respond to the *Feedback Regarding Compliance Issues* of the Maldives (dated 17 June 2021) issued following the 18th 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 not provided data on size frequency for coastal fisheries as required by Resolution 15/02.**
- 2. Has not provided data on size frequency for surface 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 per 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. Further steps are taken to report segregated datasets by fleet and vessels that belong to the coastal fleet category (i.e. <24m and operating within the EEZ).

Sampling effort has also been boosted with the funding made available from the World Bank's Sustainable Fisheries Resources Development Project.

Maldives has been gradually increasing the coverage of SF data collection by deploying additional samplers in major fishing islands. However, in 2020 no progress was made with travel restrictions imposed due to COVID 19.

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

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Licensing of longline fishing vessels in the Maldives has been temporarily suspended due to changes in policy. Vessels have not been licenses to fish using longline gear since June 2019.

4. Has not provided nominal catch data for sharks 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.

5. Has not provided catch & effort data for sharks 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.

6. Has not provided size frequency data for sharks 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.

7. Has not provided report on transhipments within Maldives as required by Resolution 19/06.

With the recent development into the fisheries information system, Maldives will be able to share preceding year's report by the end of April each year.

8. Has not implemented a Regional Observe Scheme as required by Resolution 11/04.

9. Has not achieved 5% coverage by observers for all vessels 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). However, in 2020 with COVID restrictions Maldives had to suspend onboard observer program.

As reported previously through our feedback letters, we have piloted 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.

10. Has not achieved 5% coverage by observers for artisanal fisheries 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 due to the Covid Maldives had to suspend the program during 2020.

11. Has not declared imports in the annual report as required by Resolution 01/06.

Import of tuna and tuna like species to the Maldives is minimal, thus the need for a full-fledged catch documentation scheme for import of tuna products is not a priority for Maldives. Additionally, the implementation of this Resolution, requires changes to current regulatory framework to mandate catch documentation for import of any tuna and tuna like species into the Maldives. For the reason mentioned above and due to the limitations in capacity and resources this task is still pending. A regulation to address this issue will be put in place in future. Information on the export of Bigeye tuna is provided as per the resolution 01/06.

12. Has not provided zero catch data as required by Resolution 18/07.

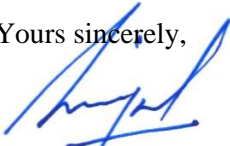
Maldives provided the zero-catch data sheet in 2020, however a minor error in completing the sheet is the reason for a non-compliant rating against this requirement. Maldives has addressed the issue and the updated zero-catch matrix was shared in the year 2021.

13. Has not adopted VMS for all vessels as required by Resolution 15/03.

Maldives is progressively increasing VMS coverage of the fishing fleet above 24m and above. Presently, the coverage of VMS is above 65% for vessels larger than 24m LOA (as required by the resolution). The ongoing project which started in early 2020 for the installation of VMS has been delayed due to the travel restrictions imposed due to the COVID.

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