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Statement to the 25th Session of the Indian Ocean Tuna Commission 16-20 May 2022

The Pew Charitable Trusts welcomes the opportunity to participate as an observer in the 26th Session of the Indian Ocean Tuna Commission (IOTC). We appreciate the work of the Secretariat, Chair, and members to convene a hybrid meeting due to the continuing extraordinary situation related to the COVID-19 pandemic and the importance of transitioning back to the more effective face-to-face meetings.

While the hybrid meeting format will still complicate opportunities for extensive negotiation, there remain more opportunities for progress than during previous virtual meetings. We therefore urge members to hasten the introduction of new approaches that provide greater resilience and stability to the region's fisheries, and encourage them to:

➤ **Adopt a management procedure for bigeye tuna**

A decade after adopting a limit reference point for bigeye tuna, the Commission has successfully undertaken and completed a management strategy evaluation (MSE) to develop a high-performing, fully specified management procedure (MP) for this important stock. The proposal put forward by Australia ([Proposal G](#)) represents the culmination of years of work that will modernize the management of bigeye tuna, ensuring predictable, abundant, and sustainable future catches for industry and the market, as noted in [Information paper 1](#).

Proposal G could be improved by minimizing the time between running the MP and implementing the TAC through automatically adopting the TAC in the absence of any exceptional circumstances, as is currently done for skipjack. This would reduce the lag between catch data availability and management action by 12 months. Implementing a mechanism for restricting catch should also be established as soon as possible, ideally in 2023. With these changes, the **Commission should adopt the proposed management procedure**, significantly improving on the current management of bigeye tuna.

➤ **Revise Resolution 19/01 on yellowfin and Resolution 16/02 on skipjack to end overfishing and adhere to agreed catch limits**

Yellowfin tuna has been classified as overfished since 2015, yet to date, none of the five measures adopted have succeeded in ending overfishing, let alone rebuilding the stock. Furthermore, the

skipjack catch limit has been exceeded in every year since the 2016 adoption of the harvest control rule on which it is based. The Commission must address and resolve both of these issues in a manner which can achieve consensus among CPCs at this year's meeting. Rebuilding yellowfin and fully implementing management procedures for both skipjack and yellowfin are more important now than ever and central to the very credibility of IOTC management.

To comply with IOTC's mandate, including its commitment to the precautionary approach outlined in Resolution 12/01, **the Commission should seek to revise Resolution 21/01 in a manner that will immediately end overfishing and promote the development and adoption of a management procedure for yellowfin tuna no later than 2023.** A yellowfin management procedure will provide IOTC with the tools necessary to both rebuild the population and eventually maintain a sustainable, profitable, and predictable fishery.

The Commission must also provide clarity on how CPCs can comply with the HCR-based skipjack catch limit, not only for 2021-2023 period, but also for future HCR determined limits. Res 21/03 calls for addressing this disconnect at its session this year and while two proposals have been put forward, both are only short-term fixes and will need to be revisited when a new catch limit is determined. **The Commission should resolve this implementation issue and provide a pathway for compliance with future IOTC management procedures and other measures.**

➤ **Improve transshipment management by strengthening monitoring and reporting and increasing data sharing**

Reported IOTC transshipment events have increased 118% since 2014. However, despite this upward trend, current regulatory control and monitoring of transshipment has remained relatively unchanged since 2012. Resolution 21/02 contains loopholes that can facilitate IUU activity such as misreporting or non-reporting of catches and make it very difficult to cross-check and verify transshipment reporting. Inadequate monitoring of carrier vessels flagged to non-member countries adds to the difficulties of understanding the scope and scale of transshipment operations in the Indian Ocean. To close these loopholes and further discourage IUU activity, ***the Commission should revise Res 21/02 and build on Japan's proposal ([IOTC-2022-S26-Prop1](#)) to improve monitoring, reporting, and management of transshipping activity by:***

- Requiring all vessels to report all transshipment events that include any Commission-managed species, regardless of location, to the relevant flag State, coastal State, port State, and the Secretariat within 24 hours;
- Creating a publicly available list of fishing and carrier vessels specifically authorized to transship;
- Requiring that carrier vessels be flagged to Members or CNCPs to be included on the IOTC-authorized vessel records;
- Updating the transshipment declaration form to require reporting of IMO numbers and the specific geographic locations of transshipments; and,

- Removing country-specific exemptions in the transshipment measure, ensuring consistency for all members and vessels.

Satellite tracking information has shown high levels of carrier activity in the IOTC and SIOFA overlap area in recent years, raising the possibility that multispecies transshipments could be occurring in this overlap area. Implementing a data-sharing agreement between these organizations would help increase transshipment monitoring in the co-managed overlap area, reducing opportunities for misreporting the catch and transshipment of valuable tuna species under the guise of transfers of oilfish. **The Commission should support a letter of intent (LOI) with SIOFA that will increase the amount of information shared related to species managed, caught, and transhipped by either organization.**

- **Increase observer coverage of longline fleets and endorse the terms of reference and workplan developed by the Working Group on the Development of Electronic Monitoring Standards (WGEMS)**

Low levels of observer coverage limit the collection of independent catch and operational data, reducing the accuracy of stock assessments and effectiveness of conservation management measures. The Commission currently requires only 5% observer coverage for longline vessels larger than 24 meters operating within its Convention Area, well below the scientifically recommended level. To increase this coverage and improve data quality for management decisions, **the Commission should support the incremental increase of observer coverage from 5% to 20% by 2025.**

In 2021, the WGEMS drafted terms of reference and a workplan for the development of EM minimum data standards by 2023 and EM program standards by 2025. Both pieces of work are vital to building a comprehensive EM program that properly collects, transmits, analyzes, and stores data. **The Commission should support the work of WGEMS in developing a robust EM program by endorsing the terms of reference and workplan.**

- **Strengthen monitoring, control, and surveillance (MCS) to reduce opportunities for illegal, unreported, or unregulated (IUU) fishing activities**

The Commission must continually work to close management gaps that present opportunities for IUU fishing in the IOTC area of competence. Vessel monitoring systems (VMS) represent an essential MCS tool for fisheries management. The current VMS resolution (Res 15/03) must be updated to build a more centralized system. Although progress has been slow since IOTC tasked members with this update in 2019, we commend the recent efforts of the VMS Working Group. ***The Commission must further encourage and support the VMS Working Group to provide advice, by the Commission's meeting in 2023, for the implementation of recommendations from the February 2019 Options Paper for the IOTC Vessel Monitoring System (Document IOTC-2019-WPICMM02-VMS Study).***

Port State measures (PSMs) offer another effective mechanism to avoid the entry of illicitly caught fish into international markets. IOTC has been a leader in setting best practices for the adoption and implementation of PSMs over several years, including through the development and roll-out of its e-PSM application. Given the recent progress being made with the Global Information Exchange System (GIES) for the UN FAO's Port State Measures Agreement, **the Commission should support the automated connection between the e-PSM application and the GIES, in order to enable exchange of information that is critical to the implementation of the PSMA.**

Catch Documentation Schemes (CDS) represent a powerful tool to preventing IUU fish entering the market. To maximize the benefits of a CDS in the IOTC, the system should include near real time reporting, ensure compatibility with CDS systems in other RFMO's and integrate with the IOTC PSM system. ***The Commission should therefore encourage the continued work of the CDSWG to deliver a proposal for consideration at IOTC 27 in 2023.***

➤ **Improve compliance process via revision of Annex V of the IOTC Rules of Procedure**

It is widely acknowledged that the current compliance system in IOTC can be improved. One mechanism to do so is an amendment to Annex V of the IOTC Rules of Procedure. The current [proposal](#) to amend Annex V by the European Union has been under negotiation since 2018 and, as such, incorporates the viewpoints of a number of CPCs. ***The Commission should now endorse the EU proposal to amend Annex V of the IOTC Rules of Procedure*** as part of a broader effort that should work to ensure clear and consistent CMMs; robust systems around data collection, information management, and reporting; effective assessment of compliance; and clear and enforced outcomes arising from compliance review mechanisms, which should also include incentives for good compliance.