

## Annex: INDIA's Response to the Letter of Feedback regarding compliance issues.

The CoC <b>ACKNOWLEDGED</b> the difficulties that <b>India</b> continue to face to fully implement the following CMMs adopted by the Commission:	<b>Response</b>
<ul style="list-style-type: none"> <li>Has not adopted VMS for all vessels &gt; 24 m and &lt; 24 m fishing high seas, as required by Resolution 15/03.</li> </ul>	<p>India has only four exploratory longline vessels in the IOTC RAV. All these four Authorized Fishing Vessels are Government owned and Government (Fishery Survey of India) operated exploratory survey vessels, following government monitoring protocols. India vide communication (F.No. 43-6/2020 Fy.II) dated 05 August, 2021 submitted the reporting template to the IOTC.</p>
<ul style="list-style-type: none"> <li>Has not provided the VMS implementation plan, as required by Resolution 15/03.</li> </ul>	<p>All 04 Authorized Fishing Vessels of India are not commercial fishing vessels but the Government owned and Government (Fishery Survey of India) operated exploratory survey vessels, following Government monitoring protocols. Compliance Committee may consider it 'N/A' w.r.t. specific reporting requirement for such category of non-commercial vessels.</p>
<ul style="list-style-type: none"> <li>Has not reported Catch &amp; Effort for Coastal fisheries, as required by Resolution 15/02.</li> </ul>	<p>India vide communication (F.No. 43-6/2020 Fy.II) dated 30 June 2021 submitted the annual catch and effort data for coastal fisheries segregated in to FAO areas 51 and 57, as per the reporting requirements listed in the relevant IOTC Resolutions. The periodicity of data submission (mentioned as 'frequently') is not clearly defined in the Resolution 15/02.</p>
<ul style="list-style-type: none"> <li>Has not fully reported Size Frequency for Coastal fisheries to IOTC standard, as required by Resolution 15/02.</li> </ul>	<p>India had submitted the size frequency for coastal fisheries vide communication dated 30 June 2021. However, India will furnish additional size frequency data, if there are any shortcomings in the data, in consultation with the Secretariat.</p>
<ul style="list-style-type: none"> <li>Has not reported data regarding Sharks – Nominal catch to IOTC standard, as required by Resolution 17/05.</li> </ul>	<p>India had submitted the annual nominal catch regarding sharks vide communication dated 30 June 2021 as per the reporting requirements listed in the IOTC Resolution 17/05.</p>
<ul style="list-style-type: none"> <li>Has not reported data regarding Sharks – Catch &amp; effort, as required by Resolution 17/05.</li> </ul>	<p>India had submitted the catch &amp; effort data regarding sharks vide communication dated 30 June 2021 as per the reporting requirements listed in the IOTC Resolution 17/05.</p>
<ul style="list-style-type: none"> <li>Has not reported data regarding Sharks – Size frequency, as required by Resolution 17/05.</li> </ul>	<p>India had submitted the size frequency data of sharks vide communication dated 30 June 2021. However, India will furnish additional size frequency data of sharks if there are any shortcomings in the data.</p>
<ul style="list-style-type: none"> <li>Has not provided the data on interactions with marine turtles on coastal fishery, as required by Resolution 12/04.</li> </ul>	<p>This information was provided vide communication dated 19 April 2021.</p>
<ul style="list-style-type: none"> <li>Has not provided the data on interactions with Cetaceans, as required by Resolution 13/04.</li> </ul>	<p>This information was provided vide communication dated 19 April 2021.</p>
<ul style="list-style-type: none"> <li>Has not provided the data on interactions with Whale Sharks, as required by Resolution 13/05.</li> </ul>	<p>This information was provided vide communication dated 19 April 2021.</p>
<ul style="list-style-type: none"> <li>Has not provided Observer reports, as required by Resolution 11/04.</li> </ul>	<p>India have only 4 exploratory research vessels in the IOTC RAV. At least one scientist from the Fishery Survey of India invariably participates in the voyages of these vessels, ensuring 100% observer coverage.</p> <p>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</p>

	<p>– Tuna Purse 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), observer reports could not be furnished. Therefore, the status should be changed from N/C to Not applicable (NA).</p>
<ul style="list-style-type: none"> <li>• IUU Listing – Has not vessels retained on the IOTC IUU list in 2019, Resolution 18/03.</li> </ul>	<p>No comments to offer with regard to IOTC IUU list, 2019, as the ATR on the IUU listed Indian flagged vessels was submitted.</p>
<ul style="list-style-type: none"> <li>• Has not provided the report on zero catches matrix, as required by Resolution 18/07.</li> </ul>	<p>This information was submitted to IOTC vide communication dated 19 April 2021.</p>