

## SCOPE OF APPLICATION OF THE CDS – ARTISANAL FISHERIES

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29 SEPTEMBER 2022**PURPOSE**

To provide participants at the CDSWG07 with information provided by CPCs regarding the scope of application of the CDS and on the segments of their fleets that would have difficulty to implement a CDS.

**BACKGROUND**

At the 5th Session of the CDSWG, [IOTC-2021-CDSWG05-R](#), participants tasked the IOTC Secretariat to write to CPCs:

29. CDSWG05 **RECALLED** from Discussion Paper [IOTC-2021-CDSWG04-01](#) that the factors to be considered for a CDS for artisanal fisheries, included four options, and **FURTHER RECALLED** the addition of a fifth option ([IOTC-2021-CDSWG04-R-E](#) para. 35), namely a “simplified electronic” CDS.
30. CDSWG05 **NOTED** that the Secretariat had not received any communication from Members with respect to sharing written comments intersessionally.
31. CDSWG05 **AGREED** that there is in fact no need to define artisanal fisheries but there is a need to define the segments of those fleets that might need special consideration.
32. CDSWG05 **REQUESTED** the Secretariat to write to CPCs to seek information on which segments of their fleets would find difficulty in implementing a CDS, if it is assumed that all fisheries involved in the species covered by the CDS are included, using the text reproduced in [Appendix 3](#).

**DISCUSSION**

On 15 November 2021, a letter, IOTC REF: IOTC2021-201, was sent to CPCs requesting that they provide the elements required by the CDSWG, for it to progress its work.

As of 29 September 2022, the seven responses received, by email and during the meetings of the CDSWG (Orally or by the chat box) are reproduced below.

- Maldives (Received 21 December 2021)

Please find attached the segment of Maldivian fleet which we consider as coastal fleet, typically operate within 24NM of the EEZ and authorised only to operate inside the EEZ of the Maldives. In the Maldives this segment of the fleet is also permitted to fish for the purpose of to sell their catch to exporters who trade fish and fisheries products internationally. These vessels normally undertake day fishing trips and do not have means to comply with full-fledged e-CDS.

Moreover, we would like to emphasise following points with regard to the questions stated in the letter IOTC2021-201.

1. On the fleet coverage; Maldives believed, **all vessels, if their fish goes into import/ export or international trade**, irrespective of vessel size, should strictly be covered under the catch documentation scheme.
2. Additionally, from these vessels ( from vessels mentioned in point 1), **those below 24m in OAL** (or vessels less with low carrying capacity, for example less than 60GT) should be subjected to some sort of simplified catch documentation scheme. This is necessary as full traceability back to individual vessel will be impractical to implement at the landing centers considering their typical handling operation. In Maldives, normally this segment of the fleet land 3-5 tons in a trip (engage in day trips, 2 to 5 days generally), and therefore, storing and managing these landings separately and in a way that it can be

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trace back to individual vessel will be something operationally impossible for landing/ processing facilities.

3. For **national vessels only authorised to operate within coastal waters and their catch is exclusively intended for local consumption and local trade**; this segment of the fleet (in Maldives case these vessels are generally below 15m in OAL and below 15MT in GT and operate within 12 NM of the EEZ) should not be made mandatory to include in the CDS. Maldives believes, it is beyond the scope of RFMO CDS. Besides, there isn't a need for implementing a such traceability mechanism (from individual vessels to consumer) and producing catch documentation whenever a trade is made locally. This will also be a huge burden for artisanal fleet and cottage industry that produce local fisheries products. We also think there are number of means already established under national regulations to monitor and regulate this segment of artisanal fleet through monitoring data collection mechanism (through logbook, observer program and monitoring of landing etc.). Certainly, monitoring and data collection aspect for this segment of the fleet can be further strengthen by looking into national monitoring and data collection mechanisms, but, Maldives does not believe including these vessels in eCDS is under the scope of this program, rather it will bring unnecessary burden for local fishing communities and local fish processors.

I will be available for any clarification that may require with regard to any points highlighted above.

- Seychelles (Received 21 January 2022)

In reference to the above subject, Seychelles/SFA would like to inform the Secretariat that we do not have any difficulties with the implementation of the CDS on our fleet segments because we have full coverage on our commercially exported catch. However, we do not have a CDS system for fish domestically consumed.

I will be available for any clarification that may require with regard to any points highlighted above.

- Sri Lanka (Received 31 June 2022)

Please find the attached completed template on segments of the fleet that would find difficulty in implementing a CDS in Sri Lanka.

- Madagascar (Intervention during the meeting of the CDSWG06 – Chat box)

...artisanal vessels in Madagascar are less than 10 m and operate below 8 nautical miles, they are in the majority of non-motorized vessels and most of the fishermen are illiterate. The majority of catches are intended for local consumption. In addition, we do not have a specific landing site, the vessels go directly to the fishing villages and it would be impossible to establish the CDS for this type of fishery. We cannot cover the national territory for 5600 km of coast. The majority of its vessels are unregistered. We also don't have enough staff to deal with CDS in . However, there are a few operators who collect the products of its artisanal fishermen, and export their products afterwards. At the export level, we cover all exported products and we have not problem for implementing CDS.

- Mozambique (Intervention during the meeting of the CDSWG06 – Chat box)

Mozambique Statement on the fleet that require special consideration

According with Mozambique legislation (Maritime Regulation - Art.28) artisanal fleet are vessels less than 13 meter in length, semi-industrial from 13 meters up to 24 meters and industrial vessels more than 24 meters. Mozambique applies the CDS for all fleet, full for semi-industrial and industrial and a simplified for artisanal fleet that export.

In the artisanal fleet Mozambique might face difficult on implementing a CDS for domestically consumption because of the nature of this fleet, as, Mozambique has a very large coastal line and some landing for local consumption occur out of port or fishing center.

Mozambique thinks that for the artisanal vessels (less than 13 meters) in the first stage implement a simplified CDS could help to eliminate the entrance of IUU product to the international market/trade. Mozambique do not

have a CDS system for fish domestically consumed, however, for the commercially exported catch the simplified version

- Indonesia (Intervention during the meeting of the CDSWG06 – Chat box)

All fishing vessels in Indonesia are not equipped with data communication tools to transmit data in real time  
The segments of fleets that would have the most difficulty to implement a CDS are vessels with size of 5 GT and below that operate in territorial waters. This is because these vessels have not yet been required to install a VMS and implement an e-logbook, so the monitoring only relies on the data available in the vessel's record.  
For the reasons above, IDN support Maldives that for Artisanal Fisheries with vessels <15 m and operate in the territorial waters, should be not mandatory to implement the CDS

- European Union (Intervention during the meeting of the CDSWG07)

The EU has no segment of its fleet that would find difficulty in implementing a CDS.

### RECOMMENDATION/S

That the CDSWG07:

- 1) **NOTE** the information provided in document IOTC–2022–CDSWG07–02, from the Maldives, the Seychelles, Sri Lanka, Indonesia, Madagascar, Mozambique, and the European Union,
- 2) **NOTE** the effort of the IOTC Secretariat to reach out to CPCs,
- 3) **NOTE** that the majority of CPCs did not provide a response.