



Sustainable Indian Ocean Tuna Initiative

A Fishery Improvement Project for the Indian Ocean Purse Seine Tuna Fishery

104 avenue du Président Kennedy, 75016 Paris, France

<https://fisheryprogress.org/fip-profile/indian-ocean-tuna-purse-seine-sioti>

January 27th, 2023

The Sustainable Indian Ocean Tuna Initiative (SIOTI) submits this statement to the 6th Special Session of the Indian Ocean Tuna Commission (SS6) due to start on 3rd February 2023.

SIOTI¹ is a large-scale Fishery Improvement Project (FIP) comprising major purse seine fishing fleets and tuna processors in the Indian Ocean. We are science led organisations and see the clear need for effective FAD management and stock rebuilding for the long-term benefit of all Indian Ocean stakeholders, businesses – including our own – and thousands of workers that make up the seafood economy.

We would like to express our support for the proposal ‘On Management of FADs’ from the European Union². In addition, we would like to reiterate our commitment to a sustainable use of resources of the Indian Ocean and to well-designed management measures, that take into account the effects of the different fleets on stock status. While acknowledging the importance that the dFAD purse seine fishery has in the Indian Ocean and willing to contribute to well-managed fisheries in the Indian Ocean, SIOTI notes that the catches of tropical tunas that are taken on their dFADs represent only a portion of total catches. The adoption of measures unilaterally directed at dFADs used by purse seiners, as in the previous Resolution 19/01 on the yellowfin tuna rebuilding plan³, are very unlikely to be effective as any positive impacts on stocks would be offset by the activities of fleets not subject to measures that account for about 70% of the catches of tropical tunas.

With these objectives and observations in mind, we would like to express our objection to the proposals by Kenya (et al) and India that involve a FAD closure period or outright ban⁴, that would only be applicable to purse seiners using dFADs. In particular, we would like to highlight the following deficiencies within these proposals:

Management measures, reporting requirements and scientific work:

- Well-designed management measures should take into account the effects of all gears on stock status. SIOTI members therefore support the proposal by EU that the Scientific Committee carries out a comparative analysis of the contribution of all fishing gears to the juvenile mortality of targeted tunas and provides adequate advice to the Commission.
- Well-designed management measures also require proper scientific advice from the Scientific Committee to the Commission, that should be based on good quality data. This includes a proper monitoring of dFADs used by purse seiners but not only, since the use of FADs (dFADs and aFADs) by other gears is also likely to have impacts on tuna stocks and ecosystems. SIOTI members would like to propose that all gears using FADs, whether they have deployed them in the first place or not, to be subject to the same reporting requirements (IOTC 3-FA form). On our side, SIOTI members are already fulfilling the requirements of IOTC 3-FA form, and have also contributed to redesign it in 2022, so that the best quality data is available to the Scientific Committee.
- Finally, well-designed management measures should be based on science rather than on political agendas. While SIOTI members are committed to reducing the impacts of their activities on tuna stocks and ecosystems, we note a disproportionate emphasis on dFADs that disregards the impacts of other fisheries on Indian Ocean stocks, and CPC compliance issues. We are concerned that this focus on dFADs relates more to the commercial interests of some IOTC CPCs than to the conservation of Indian Ocean stocks.

¹ SIOTI is an association registered in France.

² IOTC-2023-SS6-PropA

³ IOTC-2021-SC24: “Some of the fisheries subject to catch reductions have achieved a decrease in catches in 2020 in accordance with the levels of reductions specified in the Resolution; however, these reductions were offset by increases in the catches from CPCs exempt from and some CPCs subject to limitations on their catches of yellowfin tuna”.

⁴ IOTC-2023-SS6-PropD and IOTC-2023-SS6-PropB



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FAD closure

- It is misleading to propose a dFAD closure for purse seiners, on the assumption that, if moratoria have been adopted by all other RFMOs, this management measure will be effective in rebuilding YFT in the Indian Ocean. IATTC and WPCFC for example, implemented moratoria as a means to manage fishing capacity rather than as a means to manage dFADs or reduce mortality of juveniles. In ICCAT, the efficiency of the current dFAD moratorium still needs to be properly assessed. Therefore, SIOFI members believe that Kenya and like-minded CPCs should consider the specific context of the Indian Ocean to propose adapted management measures.
- In addition, the proposals for a dFAD closure period by Kenya or outright ban by India are based on an assumption that reduced juvenile catch by the purse seine fishery would rebuild the YFT stock. This is not only unscientific but also unrealistic and inequitable. The top three gear types in terms of juvenile YFT catches are: purse seine (catching on dFADs), gillnet and pole & line⁵. Any proposal for a management measure that aims to reduce catches of juvenile yellowfin (FAD moratorium or other tool), should, at a minimum, be based on scientific analyses and include all gear types responsible for these catches. However, we see no proposals in relation to gillnet or pole & line.
- Finally, a FAD closure period will result in a significant disruption of tuna supply to the canneries of Mauritius and Seychelles. Clearly, this would have a serious adverse impact on the economies of these Small Island and Developing Nations. Therefore, the proposal of Kenya (et al) should not be viewed as a unified Coastal States position on dFADs. Any proposal for a dFAD moratorium should therefore also include a socio-economic analysis of its impact on Small Island and Developing Nations.

dFAD design and mitigation of loss

- SIOFI members have actively worked since the 2010s to reduce the impacts of the design of their dFADs. This was true when they developed low entanglement risk dFADs during the 2010s and then moved to fully non-entangling dFADs in 2020. This is still true with various pilot projects aiming at finding solutions for biodegradable dFADs, though this transition will take time. Therefore, SIOFI members support EU's position regarding the gradual transition to biodegradable dFADs and commit to continue their efforts for this transition.

We note, overall, that disputes on FADs are diverting the attention of the Commission away from tackling the key task of YFT rebuilding through equitable reductions in catches – recent IOTC meetings have spent days discussing FADs but have failed to gain agreement on yellowfin catch limits to be applied to all CPCs, to all gears and with no exclusions, as is urgently required.

Tony Lazazzara, SIOFI President

⁵ <https://www.iotc.org/WPTT/22AS/Data/11-SFYFT>