

SHILAT

Iran Fisheries Org.

Ministry of Jihad-e-Agriculture

Islamic Republic of Iran

To: Dr. Christopher O'Brien  
Executive Secretary of IOTC  
**Subject: Feedback regarding compliance issues**

07, Mar, 2023  
**Date:**  
**No :** 45707  
**Encl:**

Dear Sir,

Respectfully, based on, the chairperson of the Indian Ocean Tuna Commission, Ms Kim Jung -re feedback letter, IOTC Ref. IOTC 2022-127, I would like to inform you that:

**-Has not provided its complete response to the Feedback Letter.**

**-Has not implemented the requirement on marking on gears, as required by Resolution 19/04.**

According to the provisions of this resolution, in our national regulation of tuna fishing is mentioned in items of above IOTC resolution has been in started and it is totally addressed to stakeholders, purse seiners wholly implemented the regulation, so far however, artisanal vessels are confronting some limitations. IFO is currently effort to resolve the problems, although there is not any specific guideline available for this purpose and we welcome any experience in form of guideline for artisanal vessels.

**-Has not fully implemented the IMO number requirement on eligible vessels, as required by Resolution 19/04.**

IFO has started to follow this case and there is joint meeting and communication with Port and Maritime Organization and necessarily with fisheries Cooperatives. Surely, issuing IMO number, for all artisanal vessels, need time and the individual demand of each vessel. It is expected to be achieved to register all the IMO number of the vessels by end of 2024.

**-Has not reported catch & effort and size frequency to IOTC Standard for the coastal and surface fisheries, as required by Resolution 15/02.**

Iran Fisheries Organization (IFO) submitted catch and efforts data for artisanal and industrial fisheries by gear type and species on due time to the Secretariat. Regarding to reporting catch and efforts by position, we has started and has coordinated with IOTC experts to provide information according to the resolution 15/02.

No. 236, Dr. Fatemi Ave, Tehran, Iran

Tel: (+98-21) 66941674 - 66943882

www.fisheries.ir

P.O.Box: 14155-6353

Fax: (+98-21)66941673

Email: ict@mail.fisheries.ir

Regarding to size frequency, IFO submitted the information of some important commercial species and preparing data are done continuously. So, IFO has tried to improve the coverage of the report by increasing number of port samplers.

**-Has not reported catch & effort and size frequency on sharks to IOTC standard, as required by Resolution 17/05.**

According to Iran Environment Organization regulation (competent authority for the species) all Shark species are protected and keeping of sharks in vessels or sale in markets are prohibited. According to the regulation there is big penalty for each sharks on board (5000 \$ for each shark carcasses). In addition sharks are not a target species, no licenses are issued for sharks catch and they have not any market. So, all sharks that are caught accidentally by the fishermen are released while they are alive (wherever possible). However, samplers receive some information during port sampling and interview by fishermen and the amount of catch and efforts of sharks species has reported to the IOTC Secretariat. Because, lack of onboard observers, the catch and efforts information by geographical position and size frequency did not report.

**-Has not submitted the mandatory report on progress of implementation of the FAO Guidelines on marine turtles, as required by Resolution 12/04.**

Regarding to the fact that different species of marine turtles are considered protected species in Iran, so hunting of these species is forbidden in accordance with the law of National regulation of tuna fishing- 2016 and Law of Hunting and Fishing of the Iran Environmental Protection Organization- 1976 [According to the law on hunting and fishing approved on 1967/06/06 (with amendments approved on 1975/01/20 and 1996/12/15) determining the price of wild animals in terms of claiming damages is from authorities and powers of the Supreme Council for Environmental Protection. According to article 18 of this law about mentioned crimes, the Environmental Protection Organization is recognized as a private plaintiff in terms of claiming damages resulting from the crime.

**-Has not provided information for Striped Marlin, Black Marlin, Blue Marlin and Indo-pacific Sailfish, as required by Resolution 18/05.**

Iran Fisheries Organization (IFO) submitted catch and efforts data for all fleet by gear type and species on due time to the secretariat. But on geographical position of vessels we started and coordination with IOTC experts to provide information and will be implemented according to the resolution 15/02.

In the case of billfish, since they are landed in cut forms it has caused lake of reporting size frequency.

**-Has one vessel on the IOTC IUU Vessels List.**

Regarding the Koosha 4 vessel, I would like to announce that in the last virtual meeting of CCAMLR, Iran was invited as an observer, and the Iran's statement about Koosha 4 was read out loud and the relevant documents were sent to the secretariat of that commission after the meeting in order to circulate between the member states for consideration and making the final decision on removing koosha 4 from the NCP-IUU vessels list of the commission. Right now we are waiting to hear the final decision by the CCAMLR secretariat.

In the end on behalf of IFO, I offer my great thanks to IOTC secretariat and the chairperson of the commission to considering any weaknesses on implementing IOTC resolutions and make you sure IFO always try to have more progress and improvements in fully implementing of any resolutions of IOTC. Please do not hesitate if you need more information or you have any questions.

Yours sincerely,

S.M. Beheshtian,  
Iran Commissioner to the IOTC