

**Statement to the 27th Session of the Indian Ocean Tuna Commission
8-12 May 2023**

The Pew Charitable Trusts welcomes the opportunity to participate as an observer in the 27th Session of the Indian Ocean Tuna Commission (IOTC). We appreciate the work of the Secretariat, Chair, and members to continue to convene a hybrid meeting in what is now hopefully a post-COVID-19 world.

The Commission has faced a number of challenges in negotiating contentious measures over recent years, and this has resulted in an increasing number of objections to adopted conservation and management measures (CMMs). This is unacceptable, as it is unprecedented in international fisheries management and undermines the ability of the Commission to effectively manage the stocks under its mandate. The ease with which members can lodge objections and the increasing frequency with which members are using this option are very concerning for the future direction of the Commission. We urge all members to urgently negotiate solutions to the outstanding difficult issues so that consensus can be reached, resulting in full implementation and more effective management.

We also urge members to hasten the introduction of new approaches that provide greater resilience and stability to the region's fisheries, and encourage them to:

- **Advance sustainable fisheries for tropical tunas through the development and full implementation of management procedures.**

We support the intent of [Proposal E submitted by Japan](#). This or some other mechanism needs to be applied to ensure compliance with the bigeye catch limit until a more permanent allocation arrangement can be agreed. ***The Commission must agree to a mechanism to implement a 80,583t bigeye catch limit for 2024-25 based on the management procedure (MP) adopted in Res. 22/03.***

Yellowfin tuna has been classified as overfished since 2015, yet to date, none of the five measures adopted have succeeded in reducing catch sufficiently to end overfishing or even begin rebuilding the stock. 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. Because a yellowfin MP will provide IOTC with the tools necessary to both rebuild the population and eventually maintain a sustainable, profitable, and predictable fishery, finalizing the management strategy evaluation (MSE) should

be prioritized for 2024. The Commission should therefore ***revise Res. 21/01 to immediately end overfishing and outline steps to complete the MSE to enable MP adoption in 2024.***

The skipjack catch limit has been exceeded by as much as 30% in every year since the 2016 adoption of the harvest control rule (HCR) which provides it. Res 21/03 called for addressing this disconnect at the 2022 annual meeting, but the issue remains. The Commission must therefore provide clarity on how CPCs can comply with the limit, not only for the current period, but also for future limits as determined by the HCR. As such, ***the Commission needs to agree to a mechanism to urgently implement the catch limit based on Res. 16/02's HCR and support the workplan to revise the HCR to a full MP in 2024.***

Rebuilding yellowfin and fully implementing management procedures for the three tropical tunas is more important now than ever and central to the very credibility of IOTC management.

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

It is widely acknowledged that the current compliance system in IOTC should be improved. Proposal IOTC-2023-CoC20-13, which has been amended to reflect the viewpoints expressed by a number of CPCs since it was first introduced in 2018, would update Annex V of the IOTC Rules of Procedure and would increase the efficacy of the compliance process in IOTC. ***The Commission should now adopt the proposal to amend Annex V of the IOTC Rules of Procedure*** which would match similar advancements made by other tRFMOs and implement fundamental principles of good compliance outlined in information paper 5: [Approaches to Evaluate and Strengthen RFMO Compliance Processes and Performance - A Toolkit and Recommendations](#). This paper was produced by global RFMO compliance experts.

➤ **Increase observer coverage of longline fleets and endorse the electronic monitoring System and Data Standards 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 and management measures. The Commission 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 an incremental increase of observer coverage from 5% to 20% by 2025.***

Electronic monitoring provides a cost-effective pathway to achieve some of this incremental increase. The third meeting of the WGEMS agreed on a set of IOTC EM System and Data Program Standards, and [Proposal H](#) has been put forward for the Commission to endorse them at this

meeting. ***The Commission should adopt these standards and enable the use of EM systems by CPCs in the collection of data for the regional observer scheme as per Res 22/04.***

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

Fishing has long been known as one of the world’s most dangerous professions with a new [study](#) finding that more than 100,000 fishing-related deaths occur each year—three to four times previous estimates. Furthermore, vessels with substandard safety and working conditions for fishers and observers are frequently linked to IUU fishing activities¹. Yet no official data are collected on incidents at sea, despite reports of fatalities in the IOTC Convention area. ***The Commission should therefore require regular data collection and reporting on safety and labour-related incidents that occur in the Convention Area and consider establishing an ad hoc working group on safety and labour. These could be based on the best practices developed in other RFMOs such as WCPFC and ICCAT.***

IOTC’s 2nd Performance Review states that “the sense of accountability within IOTC seems to be very low; therefore more accountability is required”. An international boarding and inspection scheme is intended to monitor compliance and will help ensure compliance with the provisions of the Convention and CMMs adopted by the Commission. A similar measure adopted by WCPFC in 2006 has proven successful in monitoring the waters of the Convention area efficiently through the pooling of resources. In 2022, the IOTC agreed to revive the Working Group on High-Seas Boarding and Inspection (WGHSBI). ***The Commission should therefore encourage progress in this working group to work towards adoption of an international boarding and inspection scheme for areas beyond national jurisdiction with all Parties encouraged to provide inspectors and inspection vessels according to their capacity. The scheme should also include a capacity building element for developing coastal states.***

The Commission must also 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 work of the VMS Working Group by agreeing on a pilot VMS project and by providing advice, by the Commission’s meeting in 2024, for the implementation of recommendations from the February 2019 Options Paper for the IOTC Vessel Monitoring System (Document IOTC-2019-WPICMM02-VMS Study).***

¹ 4th FAO/ILO/IMO Joint Working Group meeting on IUU Fishing and other related matters

Port State measures (PSMs) offer another effective mechanism to avoid the entry of illicitly caught fish into international markets. The IOTC has been a leader in setting best practice 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, and the expectation that the system will become fully operational this year, ***the Commission should support the automated connection between the e-PSM application and the GIES, 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. Pew commends the work of the CDS Working Group, including the agreed CDS strategy. To maximize the benefits of a CDS in the IOTC, the system should ensure compatibility with CDS systems in other RFMOs and integrate with the IOTC PSM system. ***The Commission should therefore endorse the updated CDS strategy and support the continued work of the CDSWG to deliver a proposal for consideration at the Commission meeting in 2024. We also call on CPCs to commit to the implementation of the CDS strategy according to the agreed timeline.***

Resolution 07/01 promotes compliance by nationals of CPCs with IOTC conservation and management measures. However, the resolution, in its current form, fails to address what is often the root cause, those that benefit but are not directly acting in IUU activity. ***The Commission should therefore amend Paragraph 1(i) of Resolution 07/01, to include those responsible for, benefiting from or supporting such activities (e.g. as operators, effective beneficiaries, owners, logistics and service providers, including insurance providers and other financial service providers).***