



ASSOCIATION OF NATIONAL ORGANISATIONS OF FISHING ENTERPRISES IN THE EU

EUROPECHE TUNA GROUP priorities on the 27th session of the IOTC (8th-12th May 2023, Mauritius)

Europepeche Tuna Group proposes to:

- *Ensure full application of the rebuilding plan for Indian ocean's yellowfin tuna*
- *Improving data collection and transmission for target and by-catch species*
- *Expanding the scientific observer coverage for all fisheries*
- *Ensuring monitoring and control of all fleets*
- *Compelling any vessel involved in at-sea transshipment to board an IOTC observer*
- *Supporting an eco-systemic approach of fisheries management*
- *Restoring IOTC's good governance*

Brussels, 7th May 2023

1. Ensuring full application of the rebuilding plan for Indian ocean's yellowfin tuna

The yellowfin tuna stock is currently overfished and subject to overfishing. While the Commission has adopted [Resolution 21/01](#) on an interim plan for the rebuilding of the yellowfin stock, several CPCs have opposed the plan and do not apply its catch limits and reductions: Indonesia, Madagascar, Oman, Iran, India and Somalia. In its [25th session report](#), the Scientific Committee points out that “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.”¹. Improving compliance is fundamental for the implementation of the management measures.

EUROPECHE TUNA GROUP reminds that its purse seine fleet has fully applied the plan and reduced its catches accordingly.

The Scientific Committee detects “considerable uncertainty in the reported catches by some fisheries. In particular, several artisanal fisheries have increased their catches substantially in recent years, the implication of which should be further investigated. There was a lack of information to explain this sharp increase in catch. A number of additional uncertainties were identified that require further exploration, including those related to growth, natural mortality and longline catchability.”

➔ EUROPECHE TUNA GROUP calls on:

- the IOTC Scientific Committee to further progress towards resolving the issues identified in the assessments of IOTC stocks, in particular yellowfin tuna, which results in implausible low estimates of productivity, leading to an over-pessimistic view of stock status.

¹ Table 1 of the report, p.16, yellowfin tuna



- the Commission to secure the compliance of all its members, for all gears and fleets, with the tropical tuna measures in place; to ensure that future measures are fully inclusive, implemented by all members, and to make sure that future resolutions contain the required provisions to deter and penalize cases of non-compliance.

2. Improving data collection and transmission for target and by-catch species

The poor quality or even the absence of data for bigeye tuna species has been duly noted in the [Report of the 24th Session of the IOTC Working Party on Tropical Tunas | IOTC](#) (30 may 3rd June 2022): incomplete or inaccurate size frequency data, impossibility to get an accurate estimation of the fraction of juveniles caught by some of the most important artisanal fisheries and, among other, tendency to measure larger fish in longline fisheries.

➔ EUROPECHE TUNA GROUP therefore:

- welcomes the WPTT request to the Secretariat to adopt a standardization procedure for representing and comparing size-frequency distributions.
- calls on decision-makers to adopt [Proposal P](#) from Seychelles to modify Resolution 15-02 on Mandatory statistical reporting requirements, which requests a mandatory report of sampling levels and protocols.

The [Report of the 18th Working Party on Ecosystems and Bycatch | IOTC](#) also highlight in its appendix V that “the estimation of catch and effort for sharks and rays in the Indian Ocean is compromised by the paucity and inaccuracy of the data originally reported by some CPCs”. Consequently, the available information, especially the total biomass of bycatch species effected by fisheries, is probably severely underestimated, notably for artisanal fisheries that report around 90% of total sharks and ray species while their reporting of georeferenced catches remains extremely low².

➔ EUROPECHE TUNA GROUP:

- advocates for a “no data no catch” policy.
- acknowledges [Proposal R](#) from Maldives that structures in a single resolution all conservation and management measures related to sharks, and advocates to go beyond through appropriate data reporting and observer coverage.
- calls on decision-makers to support [Proposal K](#) from Korea to extend reporting obligations on cetaceans to drifting gillnets.

3. Expanding the scientific observer coverage for all fisheries

Only 5% observer coverage, for offshore fleets³, is mandatory in IOTC while science recommends reaching at least 20% observer coverage. While most of the fleets in IOTC hardly comply with this requirement, industrial fleets of purse seiners and longliners shall be able to make a bigger effort.

Gillnet fisheries particularly lack data collecting systems for both target and bycatch species. The Working Party on Ecosystem and bycatch acknowledges that focusing on scientific observer data to collect and transmit them is crucial. However, there is currently no requirement for onboard scientific observers for vessels which are less than 24 m only operating within areas of national jurisdiction⁴.

² Paragraphs 12 to 22 of the report

³ Point 2 of resolution 22/02 imposing 5% observer coverage at least refers only to “vessels of 24 meters overall length and over , and under 24 meters if they fish outside their Exclusive Economic Zone (EEZ)” while artisanal fishing vessels’ observer coverage at landing “should progressively increase towards 5% of the total levels of vessel activity” (point 4)

⁴ Paragraph 137 of the [Report of the 24th Session of the IOTC Working Party on Tropical Tunas | IOTC](#) (30 may 3rd June 2022)



Electronic Monitoring Systems (EMS) could allow to reach a better observer coverage as long as they are complemented by other collection methods to ensure that the minimum mandatory data reporting standards required by [Resolution 22/04](#) are met and provided that clear guidelines and rules are established. The Working Group on Electronic Monitoring System (WGEMS) that took place in March 2023 recommended the adoption of the “Vessel Monitoring Plan”⁵ as a general guide and examples of existing EMS installations. This very detailed plan already gives advice on where to place cameras onboard all tuna catching vessels, as well as on data requirements. EMS could also allow to improve monitoring of artisanal fisheries, which represents around 60% of catches in IOTC.

- ➔ Europêche Tuna Group calls on decision-makers to endorse:
- the Scientific Committee recommendations to adopt EM program standards⁶, EMS and data standards⁷ with its Vessel Monitoring Plan for EMS as revised by the Working Group on Electronic Monitoring System⁸;
 - the WGEMS recommendation “that CPCs include a table, alongside the vessel monitoring plans submission, that details which minimum required data fields⁹ are to be collected by electronic monitoring and which are to be collected by other approved methods”.

4. Ensuring the monitoring and control of all fleets

While the European and associated purse seine fleets are all registered and monitored, IOTC accounts for only a fraction of the activity in its area of competence and provides no indication of the total days of vessels’ activity in its record of active vessels. Only vessels larger than 24 metres in length overall or, in case of vessels less than 24m, those operating in waters outside the economic exclusive zone of the flag State, are declared in the [IOTC Record of Active Vessels](#)¹⁰. Artisanal and industrial fleets less than 24 metres operating exclusively in EEZs, including purse seiners and longliners, are not even subject to a number of vessels’ declaration. Considering that for example in the case of yellowfin tuna, artisanal fisheries alone are responsible for around 60% of the catches, this undermines the quality of catches declarations, by-catch estimations, stock assessments and fleets monitoring. Only a regional VMS tool would allow to verify vessels’ activity and their correct registration in the IOTC record.

In addition to a complete list of IOTC vessels, the establishment of a regional vessel monitoring tool as well as the adoption of a boarding and inspection scheme, as required by the [United Nations Agreement relating to the Conservation and Management of Straddling Fish Stocks and Highly Migratory Fish Stocks](#)¹¹, are paramount.

- ➔ EUROPECHE TUNA GROUP calls decision-makers to:
- revisit the classification of fishing vessels at the IOTC, with the objective to extend the IOTC requirement for Authorized and Active vessels, and VMS requirements, to all

⁵ [Report of the 3rd Session of the IOTC Ad-hoc Working Group on the Development of Electronic Monitoring Program Standards \(WGEMS\) | IOTC](#), 15-16 March 2023: Annex 4, p.18-59

⁶ Appendix 6b of the report of the 25th session of the Scientific Committee, p. 94

⁷ Appendix 6c of the report of the 25th session of the Scientific Committee, p. 99

⁸ Annex 4 of the [Report of the 3rd session of the IOTC ad-hoc Working Group on the Development of Electronic Monitoring Program Standards \(WGEMS\), 15-16 March 2023](#), p.18

⁹ Listed in Annex 2 of Appendix IV of the report WGEMS report: Annex 2 – IOTC Regional Observer Scheme Minimum Standard Data Fields, p.24

¹⁰ Obligation under [Resolution 19/04 Concerning the establishment of an IOTC record of vessels authorised to operate in the IOTC area](#)

¹¹ In force as from 11 December 2001; Article 21 on Subregional and regional cooperation in enforcement provides that “1. In any high seas area covered by a subregional or regional fisheries management organization or arrangement, a State Party which is a member of such organization or a participant in such arrangement may, through its duly authorized inspectors, board and inspect [...] fishing vessels flying the flag of another State Party to this Agreement” and that “2. States shall establish, through subregional or regional fisheries management organizations or arrangements, procedures for boarding and inspection [...]”.



motorized decked vessels fishing for stocks managed by the IOTC in the IOTC Area of Competence.

- ensure that all other vessels fishing for IOTC stocks are reported in an aggregated manner, according to the classification proposed by the IOTC Scientific Committee.
- establish a Vessel Monitoring System tool and increase its use from vessels from 24 to 15 meters in [Resolution 15/01](#); requiring all CPCs to report annually all VMS data to the IOTC would be a first step.
- consider using EMS for control.

5. Compelling any vessel involved in at-sea transshipment to board an IOTC observer

“Regional fisheries management organizations (RFMO) and coastal states regulate most at-sea transshipment, but in areas where this regulatory control and monitoring are inadequate, the risk of illicit activities—such as misreporting or nonreporting of catches and trafficking of people, weapons or drugs— increases”¹². EUROPECHE TUNA GROUP endorse this declaration of the non-governmental organization Pew and therefore advocate for the interdiction of at sea-transshipments, as already required for all fleets in the IOTC Area of Competence except from longliners.

Failing that, we call for close monitoring of at-sea transshipment through on-board or electronic IOTC observers, not only on the receiving carrier vessel as it is currently the case¹³ but also on the fishing vessels willing to conduct at-sea transshipment. [Resolution 22/02](#) also allows two exceptions for observing at sea transshipments at the IOTC regional observer program level. First, transshipment operations within the Maldives pole and line vessels and collector vessels flagged in the Maldives are exempted from all prior and real-time reporting requirements, as well as from the supervision of an observer¹⁴. Second, 11 Indonesian wooden vessels are submitted to a lighter regime, boarding national instead of IOTC observers. This year, Indonesia asked for the expansion from 11 to 17 vessels, because “in early April 2022, a significant increase in fuel price caused additional added to the operating cost of Indonesian vessels. A sufficient amount of carrier vessels is needed to reduce fuel costs to maintain the quality of fish products especially fresh tuna”¹⁵.

- ➔ EUROPECHE TUNA GROUP calls decision makers to impose the boarding of an IOTC observer on each carrier and fishing vessel involved in at-sea transshipments and to oppose to [Proposal M](#) from Indonesia to increase the number of wooden vessels derogating from the at-sea transshipment monitoring program.

6. Supporting an eco-systemic approach of fisheries management

IOTC has an obligation to monitor impacts on the ecosystem of tuna and tuna like species. This includes data transmission and analysis for all fisheries on bait-boats, when fishing for target species but also for baits, as well as their impacts on the ecosystem: on corals for baits fished close to the shore, and on fish stocks and local fishermen’s communities for baits from fish-based feed industries. The FAO recently published in January 2022 a study on [Socio-economic and biological impacts of the fish-based feed industry for sub-Saharan Africa](#) that “suggests that [this] industry constitutes a threat to the livelihoods and food and nutrition security of local communities”.

¹² <https://www.pewtrusts.org/en/research-and-analysis/issue-briefs/2023/04/most-global-at-sea-transshipment-involves-a-small-group-of-key-carriers>

¹³ Point 23 of resolution 22/02 on establishing a programme for transshipment by large-scale vessels

¹⁴ Point 3 and Annex II of Resolution 22/02

¹⁵ [Proposal 27 from Indonesia on establishing a programme for transshipment by large-scale fishing vessels \(cf Res 22-02\)](#)



As the fishing grounds for baits fall outside the remit of any regional fisheries management organization (RFMO) with a mandate to manage species other than tuna and tuna-like species, regulation of the fishery is for now entirely reliant on participating flag States. Provision of these data to IOTC could ensure transparency and sustainable management of the fishery.

In order to improve the monitoring of the impacts of tuna fisheries on the ecosystem, available data from drifting FADs (dFADs) shall also be used. Vessels other than purse seiners that fish on DFADs deployed by a purse seiner shall also collect and transmit their data to improve stock assessments and ecosystems knowledge.

More generally, ETG recognizes the on-going work on ecoregions at the Working Party on By-catch and Biodiversity¹⁶. This ecosystem modelling approach provide some insights into bottom-up and top-down control mechanisms in the food web in oceanic ecosystems.

➔ EUROPECHE TUNA GROUP calls on decision makers to:

- support [Proposal O](#) from Seychelles proposal to modify Resolution 15-01 on mandatory statistical requirements requesting more information on bait fisheries and ensuring appropriate reporting of fishing sets on D-FAD from other fleets that purse seiners.
- consider the three proposals to supersede resolution 23/02 on drifting FADs, coming from EU ([Proposal D](#)), Korea ([Proposal L](#)) and Mauritius ([Proposal F](#)) and combine scientific study of ecosystems using information collected with FADs and confidentiality of commercial data.
- support the introduction in IOTC of the ecoregion approach.

7. Restoring IOTC's good governance

Europêche tuna group fully endorses the concern voiced by the International Seafood Sustainability Foundation (ISSF) at the end of the 6th Special Session for *“the lack of a shared effort by all IOTC delegations in working together toward the realization of scientific advice. The general breakdown of communication and negotiation that was evident at the IOTC Special Session sets an unwelcome precedent for future meetings and, ultimately, the sustainable use of Indian Ocean tuna fisheries.”*

If discord cannot be overcome, the gap left by IOTC might be filled by the new treaty on Biodiversity Beyond National Jurisdiction (BBNJ). The text specifies the BBNJ agreement cannot undermine the scope, mandate, and competences of other organizations, which includes RFMO's mandate over fisheries management and environmental protection, but it also allows the new international tool to make recommendations to them regarding area-based management tools and environmental assessments. It seems crucial that the RFMO members, but also the FAO under which it operates, ensure that a good governance and spirit allow the Commission to fulfill its mandate of ensuring fisheries sustainable management within its area of competence.

➔ EUROPECHE TUNA GROUP exhorts delegations to restore a good governance by discussing and negotiating proposals. This is essential for measures' acceptability and enforcement.

¹⁶ Paragraphs 144 to 149 of the report of their 18th report

