

IPNLF IOTC Position Statement...

27th IOTC Meeting of the Commission

8-12 May 2023, Mauritius

The 27th Session of the Indian Ocean Tuna Commission (IOTC) is an important opportunity to demonstrate collaborative and constructive fisheries management to improve the status of tuna stocks in the Indian Ocean through effective conservation and management measures.

REBUILD INDIAN OCEAN TUNA STOCKS

The International Pole and Line Foundation (IPNLF) continues to be concerned by the poor condition of the Indian Ocean yellowfin and bigeye tuna stocks. Yellowfin tuna is the second most important IOTC species, but its stock has been overfished and subject to overfishing since 2015. An interim stock rebuilding plan was adopted in 2016, activated in January 2017, revised several times since then, but has so far proven to be ineffective. A precautionary approach should have driven IOTC contracting parties to significantly reduce their fishing pressure in this situation but catches actually increased by over 10% between 2014 and 2019. Recently, the region's bigeye tuna stock has also been assessed as overfished and subject to overfishing. In the long-term, the consequences of the still declining state of both these stocks will be felt most acutely by communities in developing coastal states.

While many CPCs have maintained reduction targets stipulated in the rebuilding plan, some CPCs have not complied. Some of these CPCs have objected to the measures, while others have changed their fishing strategies, leading to increased harvests of juvenile tuna at the cost of stock productivity. The most recent stock assessment showed that the yellowfin stock is still under intense fishing pressure, it is still overfished, and it remains subject to continued overfishing. A substantial catch reduction of at least 30% from 2020 levels (capping catches at 301,700 tonnes) is now essential to recover the Indian Ocean yellowfin tuna stock within a reasonable timeframe of two generations (about 15 years). It is imperative that the Commission implement appropriate limits on these catches, which will require cooperative action by all IOTC members, especially among nations taking the largest and most damaging harvests.

*We urge the IOTC to take into account the downfalls of previous approaches which have featured a lack of precaution or suitable consideration of stock productivity and longevity limitations. At minimum, the Commission should **follow the latest advice from the IOTC Scientific Committee on at least 30% catch reduction** and ensure harvest reductions are fairly allocated in accordance with the historic and current relative stock and habitat damage caused by different nations' fleets.*



EFFECTIVE MANAGEMENT OF FISH AGGREGATING DEVICES (FADS)

Both yellowfin and bigeye tuna stocks are overfished and subject to overfishing in the Indian Ocean. To rebuild these stocks, it is important that their reproductive potential is no longer compromised by excessive juvenile harvests and to give time for age-classes to mature into spawning adults. All FADs contribute to juvenile harvest of bigeye and yellowfin tuna. However, drifting FADs and anchored FADs are not comparable in scale of use, design, pollution contribution, ghost fishing threat, and the threats they pose to the food security and livelihoods of coastal communities.

Drifting FADs (dFADs) pose a significant threat to these stocks' reproductive potential and productivity; up to 97% of the yellowfin tuna and almost 100% of bigeye tuna harvested by industrial purse seine fleets around dFADs are juveniles (IOTC nominal catch and size data sets). By preventing millions of tunas from reproducing before being harvested, dFAD fishing severely limits the productivity of stocks, and upon the relative yield each fish provides for food security, nutrition and trade.

A lack of scientific advice has been increasingly suggested as a prerequisite for effective dFAD management. This clearly contradicts the obligation of IOTC members to apply the precautionary approach - a key environmental principle that mandates action to prevent possible environmental damage even before there is scientific evidence that damage will certainly occur. The precautionary approach is not only incorporated as a resolution at the IOTC but is also specifically mentioned under Article 6 of the UN Fish Stocks Agreement (UNFSA) which states that "States shall be more cautious when information is uncertain, unreliable or inadequate and that the absence of adequate scientific information shall not be used as a reason for postponing to take conservation and management measures". As such, this has become a fully-fledged and general principle of international environmental law.

Another important consideration is the lack of dFAD data being submitted to the Secretariat for further analysis by the IOTC's Scientific Committee, with backlogs in data dating as far back as 2015. The detrimental impacts of dFADs on tuna stocks and the wider ecosystems cannot be denied. Endangered turtles, sharks and marine mammals are often caught when dFADs are encircled by the massive purse seine nets deployed by these fishing vessels. These animals are then hauled aboard as 'bycatch' together with the tuna destined for markets in the EU and elsewhere. Additional environmental damage is also caused when purse seine vessels lose, discard or deliberately abandon their dFADs – often because it is no longer financially viable to retrieve them. The ecological damage caused by dFADs through ghost fishing, plastic pollution and damage to sensitive coastal habitats such as coral reefs and seagrass beds are felt long after they've been lost, abandoned or discarded.



Current arguments against the adopted 72-day FAD closure, which may be adjusted based on scientific advice received within this year, hinge upon a claimed lack of scientific evidence on how this might benefit Indian Ocean tuna stocks. However, ocean-wide dFAD closures have been adopted in all other tuna regional fisheries management organizations (RFMOs) as precautionary measures, due to shared clear scientific understanding about stock conditions and levels of juvenile harvest. These measures are supporting the health and even rebuilding of tuna stocks in other regions but are somehow being firmly opposed in the Indian Ocean. For example, in the Atlantic Ocean, ICCAT Recommendation 21/01, which was originally endorsed in 2019, applied a 72-day oceanwide dFAD closure which is considered an important contributor to halting the overfishing of Atlantic bigeye tuna since 2019 in that ocean.

*Noting the above concerns and encouraging global precedents, we call on the IOTC to **maintain the principle of the oceanwide FAD Closure and other measures of Resolution 23/02**, as adopted by majority vote during the Sixth Special Session of the IOTC.*

DEMONSTRATE CONSTRUCTIVE, COLLABORATIVE LEADERSHIP

Whenever possible RFMO decisions should be made by consensus in order to give fishing regulations strength and the highest chance of successful implementation. This means that all parties should be willing to make some compromise, while measures adopted by majority votes should also be respected. IPNLF are concerned by the number of objections received in recent years to measures on both yellowfin tuna stock rebuilding and FAD management. To ensure the long-term future of IOTC fisheries it is important that they are well managed, while objections directly undermine management and put the future of the stocks and associated ecosystems at risk.

*As a general principle, IPNLF urges all IOTC members to **cooperate more effectively and to not use objections to undermine the effective management of Indian Ocean tuna and tuna-like resources or their associated environments**. The protection of narrow commercial interests, especially of industrial fisheries, should never outweigh the importance of minimising biodiversity loss, protecting ocean ecosystems and safeguarding the long-term future of coastal communities that depend on these resources for their livelihoods and food security.*