



Annex: Compliance issues from CoC20.

CPC: Iran	Responses/clarifications
<ul style="list-style-type: none"> Has provided the mandatory report, response to feedback letter, one compliance issue not responded, as required by the Commission. 	<p>Unfortunately, this issue has been raised in the feedback letter for several years now. I previously inquired with the Chair of the CoC20 meeting to identify which specific items in the letter lacked a response from the previous year, but the Compliance section hasn't provided clarification. To ensure a prompt response, could you please specify which one compliance issue was not addressed in the previous year so that we can answer it?</p>
<ul style="list-style-type: none"> Has not transposed into national legislation the requirement related to marking of gears, for all gears, as required by Resolution 19/04. 	<p>According to para. 2-2 of Article 2 National regulation of Tuna Fishing Management, it is stated that all fishing gears must be marked and this has been communicated to fishing operators and fisheries managers</p>
<ul style="list-style-type: none"> Has partially implemented the IMO number requirement for eligible vessels, as required by Resolution 19/04. 	<p>The Iran Fisheries Organization (IFO) has prepared a guideline for obtaining an IMO number for tuna fishing vessels in the past year. The directive was signed by the Deputy of fishing and fishing Ports of Iran Fisheries Organization and communicated to all vessel operators, owners, and provincial fisheries managers. As per the guideline, it is mandatory for eligible vessels to obtain an IMO number.</p>
<ul style="list-style-type: none"> Has not provided for all fleets/gears the official national fishing logbooks template, not at IOTC standard, no fishing logbook reported for coastal vessels (PS/Line/GN/LL) less than 24 metres operating within the EEZ, as required by Resolution 15/01. 	<p>The relevant logbook for purse seine and gillnet vessels has been prepared in both English and Persian based on the IOTC format and has been announced to the beneficiaries and is currently being implemented</p>
<ul style="list-style-type: none"> Has not transposed into national legislation the prohibition on large-scale driftnets in the IOTC Area, copy of the legal document not provided, as required by Resolution 17/07. 	<p>According to para. 2-2 of Article 2 National regulation of Tuna Fishing Management and part B of the regulation on gillnet-Based Tuna Fishery and Managerial Plan, stipulate that the use of gillnets exceeding 2.5 km in length are prohibited.</p>
<ul style="list-style-type: none"> Has not transposed into national legislation the requirement on Prohibition of surface, submerged artificial lights to attract fish, copy of the legal document not provided, as required by Resolution 16/07. 	<p>As stated in para. 2-2 of article 2 of the National regulation of Tuna Fishing Management, prohibit the use of surface, submerged artificial light to attract large pelagic fish, aircrafts and unmanned aerial vehicles and similar instruments. This regulation has been communicated to the fishing operators and provincial fisheries manager in 2016.</p>
<ul style="list-style-type: none"> Has not transposed into national legislation the requirement on Prohibition of aircrafts and unmanned aerial vehicles, copy of the legal document not provided, as required by Resolution 16/08. 	
<ul style="list-style-type: none"> Has not implemented the catch limit, Nominal catch of YFT, as required by Resolution 19/01. 	<p>We note that the yellowfin tuna catch by Iran's Purse Seine vessels is below the level specified in the resolution. But regarding yellowfin catch by the gillnet fleet, according to national regulation for tuna fishing management and related correspondence with coastal provincial fisheries has been communicated to brief stakeholders to maintain conservation and management measures during the exploitation of yellowfin tuna stocks, also to have an action plan including managing on</p>

	duration of vessel fishing operation at sea as well as managing on fishing gears, also planning to change gillnet fishery to other selective fishing hook to decline fishing effort. As a result, the yellowfin catches in 2022 has decreased compared to previous years
<ul style="list-style-type: none"> • Has not transposed the prohibition of intentionally fishing within 1 nautical mile of or interacting with data buoys, copy of the legal document not provided, as required by Resolution 11/02. 	In accordance with para. 2-2 of article 2 in the National Regulation of Tuna Fishing Management, we have implemented a ban on fishing activities within one nautical mile of or interacting with data buoys. This regulation has been communicated to the fishing operators and provincial fisheries authorities.
<ul style="list-style-type: none"> • Has not transposed the prohibition of taking on board a data buoy, copy of the legal document not provided, as required by Resolution 11/02. 	
<ul style="list-style-type: none"> • Has not transposed the Prohibition of intentionally setting purse seine net around cetacean into national legislation, copy of the legal document not provided, as required by Resolution 13/04. 	In accordance with para. 3-2 of article 2 in the National Regulation of Tuna Fishing Management, the fishing of any cetacean species is strictly prohibited.
<ul style="list-style-type: none"> • Has not transposed the Prohibition of intentionally setting purse seine net around whale shark into national legislation, copy of the legal document not provided, as required by Resolution 13/05. 	In accordance with para. 3-2 of article 2 in the National Regulation of Tuna Fishing Management, the fishing of whale shark species is prohibited.
<ul style="list-style-type: none"> • Has not transposed the prohibition of intentionally setting any gear type on mobulid rays into national legislation, copy of the legal document not provided, as required by Resolution 19/03. 	In accordance with para. 3-2 of article 2 in the National Regulation of Tuna Fishing Management, the fishing of mobulid rays is prohibited.
<ul style="list-style-type: none"> • Has not provided all information related to the Report on review of flag State internal actions, not at IOTC standard, copy of the legal document not provided, as required by Resolution 19/04. 	According to Iranian law and regulation, all information related to the Report on Review of Flag State Internal Actions must be provided.
<ul style="list-style-type: none"> • Has not provided all information related to the List of Authorized vessels > 24 metres, Mandatory information missing (Beneficial owner details, company details, photographs), not at IOTC standard, as required by Resolution 19/04. 	The Iran Fisheries Organization sends the List of Authorized vessels and active vessels to the IOTC Secretariat every year, but most of the Iran fishing fleets are traditional and operated privately, or as cooperatives, the name of the vessel owner and the name of the cooperative are registered as the company. We are currently collecting photographs and will send them to the IOTC Secretariat once they are complete.
<ul style="list-style-type: none"> • Has not provided all information related to the List of Authorized vessels below 24 metres, Mandatory information missing (Beneficial owner details, company details, photographs), not at IOTC standard, missing information, as required by Resolution 19/04. 	
<ul style="list-style-type: none"> • Has not fully adopted VMS for all vessels > 24 m and < 24 fishing high seas, no legal reference provided, as required by Resolution 15/03. 	According to Para. 2-5 of articles 5 of the National Regulation on Tuna Fishing Management, all fishing vessels operating on the high seas are obliged to establish an online electronic monitoring system (VMS)
<ul style="list-style-type: none"> • Has not provided a VMS implementation plan, as required by Resolution 15/03. 	According to para. 2 and 3 of this resolution, the Islamic Republic of Iran has prepared a plan for the implementation of VMS, which is to cover fishing vessels in full.
<ul style="list-style-type: none"> • Has not reported nominal catch for coastal fisheries to IOTC standard, missing metadata, as required by Resolution 15/02. 	Since 2007, annual nominal catch data have been submitted to IOTC based on fishing method and tuna & tuna-like species and month strata.
<ul style="list-style-type: none"> • Has not reported nominal catch for surface fisheries to IOTC standard, missing metadata, as required by Resolution 15/02. 	
<ul style="list-style-type: none"> • Has not reported Discards, as required by Resolution 15/02. 	Necessary trainings and coordination have been done in this field so that the fishermen to release the protected species and report in the special format given to them.

<ul style="list-style-type: none"> • Has not reported catch and effort for coastal fisheries to IOTC standard, as required by Resolution 15/02. Missing metadata and detected inconsistencies between species in RC and CE. 	<p>All the catch and effort data in our data collection system are based on the IOTC format and have been submitted to the secretariat using the V_EF and V_CE Excel spreadsheets.</p>
<ul style="list-style-type: none"> • Has not reported catch and effort for surface fisheries to IOTC standard, as required by Resolution 15/02. Missing metadata and detected inconsistencies between species in RC and CE. 	
<ul style="list-style-type: none"> • Has not reported size frequency for coastal fisheries to IOTC Standard, as required by Resolution 15/02. 	
<ul style="list-style-type: none"> • Has not reported size frequency for surface fisheries to IOTC Standard, as required by Resolution 15/02. 	
<ul style="list-style-type: none"> • Has not provided nominal catch data on sharks, for all fleets, to IOTC standard, as required by Resolution 17/05. 	<p>Regarding the size frequency for coastal and surface fisheries, we had a full coverage in terms of 1 fish per metric tonnes, sampling coverage, and also reporting by all available fishing gears such as: gillnet, long line and purse seine fishery. For purse seine. The data reported by: month, gear and grid. For gillnetters, the size-frequency is submitted by IOTC standard but not grid area. this is possible be compiling logbook data from offshore fishing crafts and equipping all fishing dhows with VMS system to start reporting according to IOTC mandate and the related resolutions. Partly accomplished and partly is in the pipeline.</p> <p>In the context of compiling size data for billfish, it is crucial to recognize that the whole billfish is not consistently landed by Iran fishing dhows. Instead, billfish caught at sea are often sectioned into multiple pieces and subsequently brought on board to the fishing port. Consequently, obtaining precise length measurements during port sampling becomes unfeasible for field samplers.</p> <p>As an alternative approach, the implementation of an on board observer program has emerged. However, due to the rudimentary state of our fishing dhow facilities, encompassing sanitary services, food provisions, and accommodations, it remains impractical to employ an observer for extended voyages. Consequently, collecting accurate biological data for billfish species poses a significant challenge.</p> <p>To mitigate this issue, we are initiating efforts to establish morphometric relationships for billfish. Our strategy involves periodically measuring whole billfish species that are landed at Iran fishing ports in the future. This approach aims to enhance our understanding of billfish biology while addressing the limitations posed by on board data collection.</p>
<ul style="list-style-type: none"> • Has not provided catch and effort data on sharks, for all fleets, to IOTC standard, as required by Resolution 17/05. 	
<ul style="list-style-type: none"> • Has not provided size frequency data on sharks to IOTC standard (mandatory data not provided), as required by Resolution 17/05. 	
<p>At present, our organization does not have any specific initiatives to collect data on shark catches and efforts, including size frequency. It is important to note that the Iran Environmental Organization has implemented strict prohibitions on shark fishing within Iran territorial waters and high areas. Pursuant to these regulations, the capture, landing, sale, or purchase of sharks is strictly forbidden. Violations of this legal framework carry substantial penalties for fishermen.</p> <p>In addition to this, according to Islamic dietary laws, the use of sharks for food is prohibited, so there is no interest among fishermen to catch and retain sharks on board and if any shark caught on board, it should be released immediately after catch</p>	

<ul style="list-style-type: none"> • Has not transposed into national legislation the prohibition on sharks finning, copy of the legal document not provided, as required by Resolution 17/05. 	<p>According to Iran Environment Organization regulation (competent authority for the species) all Shark species are protected and keeping of sharks or any parts of them in vessels are prohibited. This has been mentioned also in the para.3-2 article 2 of the National regulation of tuna fishing management.</p>
<ul style="list-style-type: none"> • Has not transposed into national legislation the Prohibition on thresher sharks of all the species of the family <i>Alopiidae</i>, no legal reference provided, as required by Resolution 12/09. 	<p>The Iran Fisheries Organization emphasizes the importance of conserving shark species during tuna fishing. It should be noted that landing and selling these fish has been banned and deemed illegal in Iran since 2010, as stated in Para. 3-2 of Article 2 of the National Regulation of Tuna Fishing Management.</p>
<ul style="list-style-type: none"> • Has not transposed into national legislation the Prohibition on oceanic whitetip sharks, copy of the legal document not provided, as required by Resolution 13/06. 	<p>The Iran Fisheries Organization is committed to protecting shark species during tuna fishing. Since 2013, Iran has banned and outlawed any fishing, handling, or trading of oceanic whitetip sharks, as stated in Paragraph 3-2 of Article 2 of the National Regulation of Tuna Fishing Management.</p>
<ul style="list-style-type: none"> • Has not transposed into national legislation the Prohibition to retain onboard, tranship, land, store mobulid rays, copy of the legal document not provided, as required by Resolution 13/06. 	<p>In accordance with Paragraph 3-2 of Article 2 of our National Regulation of Tuna Fishing, we have informed all fishing fleets of the prohibition on intentionally setting any gear type to target mobulid rays.</p>
<ul style="list-style-type: none"> • Has not transposed the prohibition to gaff, lift by the gill slits/spiracles, punch holes through the bodies. Obligation to release alive, implementation of live release handling procedures of mobulid rays into national legislation, copy of the legal document not provided, as required by Resolution 19/03. 	<p>In accordance with Paragraph 3-2 of Article 2 of our National Regulation of Tuna Fishing, we have informed all fishing fleets of the prohibition on intentionally setting any gear type to target mobulid rays.</p>
<ul style="list-style-type: none"> • Has not reported data on interactions with marine turtles to IOTC standard, as required by Resolution 12/04. 	<p>We have not received detailed reports on the incidental catch of different species marine turtles due to the lack of onboard observers. The main problem to implementing an observer scheme is the insufficient accommodation space and facilities on board. This limitation makes it impossible to accurately record important events by species, fishing gears, and positions for the national fleets. Additionally, we have recently started establishing a network through virtual platforms on mobile phones. This has allowed us to receive some news, pictures, and videos about the safe release of these species, most of which are from Iran territorial waters.</p>
<ul style="list-style-type: none"> • Has not fully implemented and transposed into national legislation the obligation to carry line cutters and de-hookers on longline vessel, copy of the legal document not provided, as required by Resolution 12/04. 	<p>The National Regulation for Tuna Fishing Management mandates that longline vessels carry line cutters and de-hookers on board.</p>
<ul style="list-style-type: none"> • Has not fully implemented the obligation for Purse seiners carry & employ dip nets on board, copy of the legal document not provided, as required by Resolution 12/04. 	<p>According para. 3-2 to Article 2 of the national regulations for tuna fishing management, it is mandatory for purse seiner vessels to carry and employ dip nets on boards.</p>
<ul style="list-style-type: none"> • Has not reported data on interactions with cetaceans to IOTC standard, as required by Resolution 13/04. 	<p>We have not received any report from vessels or landing places, indicating no interactions with cetaceans.</p>
<ul style="list-style-type: none"> • Has not reported data on interactions with whale sharks at IOTC standard, missing information, as required by Resolution 13/05. 	<p>IFO has never received any report about Whale sharks by Iranian fishing vessels. So there is no historical catch in our database about Whale sharks.</p>

<ul style="list-style-type: none"> • Has reported information but no actions taken domestically to monitor catches of Blue Shark, as required by Resolution 18/02. 	<p>As noted in the Iran SC report, blue sharks are not targeted by Iranian fishing fleets. This is further corroborated by the absence of any recorded landings of blue sharks, which is meticulously monitored by port samplers stationed at landing sites. In fact, the shark catch is zero in our statistical report.</p>
<ul style="list-style-type: none"> • Has not transposed the prohibition to retain on board, tranship, land, any Striped Marlin, Black Marlin, Blue Marlin, Indo-pacific Sailfish smaller than 60 cm Lower Jaw Fork Length into national legislation, copy of the legal document not provided, as required by Resolution 18/05. 	<p>Iran Fisheries Organization has taken action to comply with the IOTC resolution. Although there is no target fishery for billfish, but the landings of striped marlin, black marlin, blue marlin, and Indo-Pacific sailfish have been monitored through a sampling program. As stated in Para3-2 Article 2 to national regulations for tuna fishing management, it is important to note that capturing billfish smaller than 60 cm in lower jaw fork length is prohibited</p>
<ul style="list-style-type: none"> • Has not transposed the Retention of target tuna species (YFT/SKJ/ BET) on board, copy of the legal document not provided, as required by Resolution 19/05. 	<p>In accordance with Paragraph 2-3 of Article 3 of the National Regulation of Tuna Fishing Management, the discarding of yellowfin, skipjack, bigeye tuna, and non-target species caught by purse seiner within the IOTC area of competency is prohibited</p>
<ul style="list-style-type: none"> • Has not prohibited Retention of non-target tuna species on board, copy of the legal document not provided, as required by Resolution 19/05 	
<ul style="list-style-type: none"> • Has not reported data on interactions with mobulid rays at IOTC standard, missing information, as required by Resolution 19/03 	<p>In accordance with Paragraph 3-2 of Article 2 of our National Regulation of Tuna Fishing, we have informed all fishing fleets of the prohibition on intentionally setting any gear type to target mobulid rays.</p>
<ul style="list-style-type: none"> • Has a vessel listed on the IOTC IUU vessels list, Resolution 18/03. 	<p>The Kousha 4 is a Cargo Freezer vessel that was owned by the Iran company Pars Paya Seid and registered in the IOTC in 2010. In 2011, the vessel was leased to a Spanish company and was later listed as an IUU vessel by CCAMLR.</p> <p>We would like to inform you that this vessel, which has been inactive for more than 10 years, has been sold in an auction and the ownership of this vessel has changed. The new owner of this vessel is currently pursuing the scrapping of this vessel.</p> <p>According to submission of the necessary documents to the CCAMLR Commission, which shows that the change of ownership of the vessel has been reported, and based on paragraph (III) of the specific requirements for the delisting of a vessel from the CCAMLR-NPC-IUU under conservation measure 10-07 paragraph 18, which states that one of the ways to remove a vessel from the IUU list is a change in the beneficial ownership of the vessel.</p> <p>Despite the efforts of the Iran Ministry of Foreign Affairs to address this issue with the CCAMLR, this vessel still remains on the IUU list due to the non-attendance of a representative of the Iran Fisheries Organization in the relevant meetings.</p>
<ul style="list-style-type: none"> • Has nationals on board vessel listed on the IOTC IUU vessels list, Resolution 07/01. 	