

# IOTC-2024-CoC21-sCR04-COM [E]

## 2024 **Summary** Compliance Report for: Comoros

### Report date: 11 April 2024 - 14:17

Note: Acronyms and definitions can be consulted last page of the Compliance Report.

Req. n°	Source (para n°) (year)	Information required	Deadline	Previous timeliness	Previous status	Current timeliness	Current status	Observations	CPC remarks
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## 1. Implementation obligations

1.1	Art. X Agreement (2023)	Report of Implementation	14/3/2024	C	C	L	P/C	Received 15.03.2024. <b>1 day after the deadline</b> . IOTC-2024-CoC21-IR04. <b>Failed to meet a reporting/submission deadline by less than 15 days.</b> <b>STD:</b> NO – Some section(s)/question(s) applicable not completed.	
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1.2	Rules of Proc. (4.1) (2023)	Compliance Questionnaire	24/2/2024	C	C	L	N/C1	Received 15.03.2024.2023. <b>More than 20 days after the deadline.</b> IOTC-2024-CoC21-CQ04. <b>Has failed to meet a reporting/submission deadline by more than 15 days.</b> <u>Standard:</u> YES – All section(s)/question(s) applicable completed.
1.3	SC04 (111) (2022)	National Scientific Report	19/11/2023	C	C	C	P/C	Received 19.11.2023. IOTC-2023-SC26-NR04. <u>LEG:</u> Submitted. No <b>provision related to the national scientific report, to report/data/information to RFMOs/International organisations.</b> <u>STD:</u> YES – Report completed using the latest template report. <u>SP:</u> NO – Comoros has <b>NO system / procedure to implement this binding reporting measure.</b>
1.4	Commission (S17 p. 52) (2023)	Response to Feedback letter	14/3/2024	C	P/C	L	N/C2	Received 15.03.2024.2023. <b>More than 1 day after the deadline.</b> IOTC-2024-CoC21-FL04. <b>Failed to implement and to ensure compliance of the same obligation for two or more consecutive years.</b> <u>LEG:</u> Submitted. <i>DECREE 04/01/2020 No. 20-051/PR Promulgating Law No. 19-05/ AU revising the Fisheries and Aquaculture Code, Law No. 07-011 / AU of August 29, 2007.</i> <u>STD:</u> NO – 5 compliance issue not responded. <u>SP:</u> NO – Has declared has NO system / procedure to implement this binding reporting measure.
1.5	Art. X & XI.2 Agreement (2023)	Transposition of CMMs into national legislation	14/3/2024	-/-	-/-	L	P/C	<b>Received 15.03.2024. 1 day after deadline.</b> <u>LEG:</u> YES – <i>Code of Fisheries and Aquaculture. Development of Decree ongoing.</i> <u>STD:</u> Not applicable. <u>SP:</u> NO – Not provided for “a”, “b” and “c”.

## 2. Management Standards

2.7b	Res. 15/01 (4) (2023)	Coastal data recording system	31/12/2023 (Since 15.02.2016)	-/-	-/-	C	N/C1	Received 15.03.2024. <b>Failed to provide any information showing that Comoro has a system or procedures.</b> <i>Data/catch recording systems based on Simplified data/catch recording forms used by field samplers at landing site/port is implemented for Coastal PL, TRO, HL since [NO DATE PROVIDED].</i> <b>LEG:</b> Submitted - <i>DECREE No. 20 Promulgating Law No. 19-05/AU revising the Fisheries and Aquaculture Code, Law No. 07-011/AU of August 29, 2007- Article 13</i> . <b>STD:</b> YES – Information provided according to R15/01 (4 & 11). No coastal catch monitoring form provided. <b>SP:</b> NO – Not provided for i) ii) iii). Conflicting information provided. No SP to prepare & submit the information on data recording system for vessels below 24m operating inside EEZ.
2.8	Res. 17/07 (2) (2023)	Ban on large-scale driftnets in IOTC Area (2)	14/3/2024	N/C	N/C	L	N/C2	<b>Failed to implement, ensure compliance with the obligation. Failed to comply with the submission deadline for less than 15 days. Mandatory information, system / procedures not provided.</b>
2.9	Res. 17/07 (6) (2023)	MCS actions related to large-scale driftnets in IOTC Area	14/3/2024	C	C	L	N/C1	<b>Failed to implement, ensure compliance with the obligation. Failed to comply with the deadline. Submitted 1 day after the deadline. Mandatory information, system / procedures not provided.</b>
2.13	Res. 16/07 (1&2) (2023)	Prohibition of surface, submerged artificial lights to attract fish	31/12/2023 (Since 27.09.2016)	N/A	N/A	N/A	N/C1	<b>Received 15.03.2024. Failed to meet reporting deadline by less than 15 days.</b> <b>LEG: NO –Development of regulation ongoing.</b> <b>STD:</b> Not applicable. <b>SP: NO – Not provided for “a”, “b” and “c”.</b>
2.14	Res. 16/08 (1) (2023)	Prohibition of aircrafts & unmanned aerial vehicles	31/12/2023 (Since 27.09.2016)	C	P/C	N/A	N/C2	Failed to ensure compliance for two or more consecutive years. Received 15.03.2024. <b>LEG:</b> NO. <b>STD:</b> Not applicable. <b>SP:</b> NO – Not provided for “a”, “b” and “c”.
2.21	Res. 18/07 (1) (2023)	Report actions taken to implement reporting obligations & improve data collection of catches	14/3/2024	C	C	L	P/C	Received 15.03.2024. 1 day after deadline. <b>LEG:</b> NO. <b>STD:</b> Not applicable. <b>SP:</b> YES – For “a”, “b” and “c”.

2.22	Res 11/02 (6) (2023)	Reports observations of damaged data buoys	14/3/2024	N/A	N/A	L	N/C1	<b>Date received (15.03.2024). Failed to meet reporting/submission deadlines by less than 15 days.</b> <b>LEG:</b> NO – Not submitted. <b>STD:</b> YES – Nil report <b>SP:</b> NO – Not provided/described for a), b) and c).
2.23	Res 11/02 (2) (2023)	Prohibition from intentionally fishing within 1 nautical mile of or interacting with data buoy	4/1/2024 (Since 2011)	C	P/C	L	N/C2	<b>Date received (15.03.2024). Failed to meet reporting/submission deadlines by more than 15 days.</b> <b>LEG:</b> NO – Not submitted. Indicates it's banned by national legislation, but does not provide document or legal reference. <b>STD:</b> YES – Does not indicate banned since date. <b>SP:</b> NO – Not provided/described for a), b) and c).
2.24	Res 11/02 (3) (2023)	Prohibition from taking on board data buoys	4/1/2024 (Since 2011)	C	P/C	L	N/C2	<b>Failed to implement, ensure compliance with the obligation. Failed to comply with the submission deadline by more than 15 days.</b> <b>Mandatory information, system / procedures not provided.</b>

## 3. Reporting on Vessels

3.8	Res. 14/05 (1) (2023)	List of foreign vessels licensed in EEZ	15/2/2024	C	C	L	N/C1	Received 15.03.2024. More than 30 days after deadline. <b>LEG:</b> Submitted - <i>DECREE No. 20 Promulgating Law No. 19-05/AU revising the Fisheries and Aquaculture Code, Law No. 07-011/AU of August 29, 2007.</i> <b>STG:</b> YES – Information provided according to R14/05 (1). Foreign flag vessels (12 SYC; 1 TZA) licensed to fish. <b>SP:</b> YES – Provided for i) ii) iii).
3.11	Res. 14/05 (7, 8) (2023)	Official coastal State fishing License	31/12/2023 (Since 14.01.2014)	P/C	P/C	L	N/C2	Received 26.02.2024. <b>Last update 09.03.2017</b> <b>LEG:</b> Submitted - <i>DECREE No. 20 Promulgating Law No. 19-05/AU revising the Fisheries and Aquaculture Code, Law No. 07-011/AU of August 29, 2007.</i> <b>STD:</b> NO - Missing information: terms and conditions of the coastal State fishing license. <b>SP:</b> YES – Provided for i) ii) iii).

3.12	Res. 21/01 (26) (2023)	List of vessels fishing for yellowfin tuna	15/2/2024	N/C	N/C	N/C	N/C2	<p><b>Received 15.03.2024. Failed to meet reporting deadline by less than 15 days.</b></p> <p><b>Failed to ensure compliance for two or more consecutive years.</b></p> <p><b>LEG:</b> NO.</p> <p><b>STD:</b> NO. Report not submitted.</p> <p><b>SP:</b> NO – Not provided for "a", "b" and "c".</p>	
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## 4.Vessel Monitoring System

## 5.Mandatory statistical requirement – Flag State CPCs

5.4	Res. 15/02 (1 to 7), 18/05 (8), 18/07 (4), 19/02 (4, 22 & 24) (2022)	Nominal catch – Discards	30/6/2023	N/C	N/C	C	N/C2	<p>Received: 29.06.2023.</p> <p><b>Failed to ensure compliance of the same obligation for two or more consecutive years.</b></p> <p><b>Standard:</b> NO - No data submitted.</p>	
5.5	Res. 15/02 (1 to 7), 18/05 (8), 18/07 (4), 19/02 (4, 22 & 24) (2022)	Nominal catch – Report on zero catches matrix	30/6/2023	C	C	C	P/C	<p>Received: 29.06.2023.</p> <p><b>Standard:</b> NO - Shark catches reported for HL and TL (1RC) but not included in the matrix.</p>	
5.6	Res. 15/02 (1 to 7), 18/05 (8), 18/07 (4), 19/02 (4, 22 & 24) (2022)	Catch & Effort – Coastal fisheries	30/6/2023	C	C	C	P/C	<p>Received: 29.06.2023.</p> <p><b>Standard:</b> NO - Grid data not provided for some fisheries.</p>	
5.9	Res. 15/02 (1 to 7), 18/05 (8), 18/07 (4), 19/02 (4, 22 & 24) (2022)	Size Frequency – Coastal fisheries	30/6/2023	C	P/C	C	N/C2	<p>Received: 29.06.2023.</p> <p><b>Failed to ensure compliance of the same obligation for two or more consecutive years.</b></p> <p><b>Standard:</b> NO - Less than 1 fish/mt for some billfish and shark species.</p>	

## 6.Implementation of mitigation measures and bycatch of non-IOTC species

6.1	Res. 17/05 (3) (2023)	Prohibition on shark finning	31/12/2023 (Since 03.10.2017)	C	C	N/A	N/C1	Received 15.03.2024. <u>LEG</u> : YES - Code of Fisheries and Aquaculture (Decree No .15-050, Article 35). <u>STD</u> : Not applicable. <u>SP</u> : NO – Not provided for “a”, “b” and “c”.
6.2	Res. 12/09 (2) (2023)	Prohibition on thresher sharks - all species of family Alopiidae	31/12/2023 (Since 07.07.2010)	C	C	N/A	N/C1	Received 15.03.2024. <u>LEG</u> : YES - Code of Fisheries and Aquaculture (Decree No .15-050, Article 37). <u>STD</u> : Not applicable. <u>SP</u> : NO – Not provided for “a”, “b” and “c”.
6.4	Res. 19/03 (3) (2023)	Prohibition to retain on-board, tranship, land, store mobulid rays	31/12/2023 (Since 29.10.2019)	C	P/C	N/A	N/C2	Failed to ensure compliance for two or more consecutive years. Received 15.03.2024. <u>LEG</u> : NO. <u>STD</u> : Not applicable. <u>SP</u> : NO – Not provided for “a”, “b” and “c”.
6.5	Res. 19/03 (5, Annex 1) (2023)	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	31/12/2023 (Since 29.10.2019)	C	P/C	N/A	N/C2	Failed to ensure compliance for two or more consecutive years. Received 15.03.2024. <u>LEG</u> : NO. <u>STD</u> : Not applicable. <u>SP</u> : NO – Not provided for “a”, “b” and “c”.
6.9	Res. 12/04 (5) (2023)	Report on progress of implementation of Res. 12/04 (2)	14/3/2024	N/A	N/A	L	P/C	Date received (15.03.2024). One day after the deadline. Failed to meet reporting/submission deadlines by less than 15 days. <u>LEG</u> : NO – Not provided. <u>STD</u> : NO – Partially responded. <u>SP</u> : Provided but not described for a), b) and c).
6.12	Res 18/05 (5) (2023)	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	31/12/2023 (Since 04.10.2018)	C	P/C	L	N/C2	<b>Failed to ensure compliance with the same obligation for two or more consecutive years.</b> <b>Received 15.03.2024. Submitted 22 days after the deadline.</b> <b>Failed to meet reporting/submission deadlines by more than 15 days.</b> <b>Legislation, system / procedures not provided.</b>

6.16	Res 18/05 (9) (2022)	Information on actions taken domestically to monitor catches & manage fisheries of Striped Marlin, Black Marlin, Blue Marlin and Indo-pacific Sailfish	19/11/2023 (SC)	C	C	C	P/C	NR received 19.11.2023. IOTC-2023-SC26-NR04. <u>LEG:</u> Submitted - <i>DECREE No. 20 Promulgating Law No. 19-05/AU revising the Fisheries and Aquaculture Code, Law No. 07-011/AU of August 29, 2007.</i> <u>STD:</u> NO – Information provided in NR to SC. No action reported in e-MARIS and NR. <u>SP:</u> YES – Provided for i) ii) iii).
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## 7. Illegal, Unreported and Unregulated (IUU) Vessels

## 8. Transshipments

## 9. Observers

9.1	Res. 11/04 (9) (2022)	Regional Observer Scheme (2) (No. of vessels monitored and coverage by gear type)	19/11/2023	-/-	-/-	L	N/C1	Received 20.10.2023. <u>ROS sea:</u> Not Applicable. <u>ROS Coastal fisheries:</u> Not implemented. <u>LEG:</u> Submitted - <i>DECREE No. 20 Promulgating Law No. 19-05/AU revising the Fisheries and Aquaculture Code, Law No. 07-011/AU of August 29, 2007- Article 13.</i> <u>STD:</u> NO - Protocols supporting sampling schemes coastal fisheries <b>NOT submitted.</b> <u>SP:</u> NO – Not provided & not described for i) ii) & iii).
9.3	Res. 11/04 (4) (2022)	5 % Artisanal landings (2)	19/11/2023 (Since 2013)	-/-	-/-	C	N/C1	Received 19.11.2023. <u>LEG:</u> Submitted <i>Fisheries law - Decree N° 20-051 – Article 13.</i> <u>STD:</u> NO – Has declared NIL coverage for sampling schemes coastal fisheries. <u>SP:</u> NO – Not provided & not described for i) ii) & iii).

## 10. Statistical document programme

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# 11. Port inspection



# Current issues on the level of implementation by Comoros of IOTC Conservation and Management Measures identified for discussion in the CoC21 in 2024

Having reviewed the 2024 Draft Compliance Report for Comoros, the Chair of the Compliance Committee has identified the following significant repeated non-compliance issues for discussion.

## Repeated non-compliance issues

Requirement	Observations	Current status (2024)	Previous status (2023)
1.4	Received 15.03.2024.2023. <b>More than 1 day after the deadline.</b> IOTC-2024-CoC21-FL04. <b>Failed to implement and to ensure compliance of the same obligation for two or more consecutive years.</b> <u>LEG:</u> Submitted. <i>DECREE 04/01/2020 No. 20-051/PR Promulgating Law No. 19-05/ AU revising the Fisheries and Aquaculture Code, Law No. 07-011 / AU of August 29, 2007.</i> <u>STD:</u> NO – 5 compliance issue not responded. <u>SP:</u> NO – Has declared has NO system / procedure to implement this binding reporting measure.	N/C2	P/C
2.8	<b>Failed to implement, ensure compliance with the obligation.</b> <b>Failed to comply with the submission deadline for less than 15 days.</b> <b>Mandatory information, system / procedures not provided.</b>	N/C2	N/C
2.14	Failed to ensure compliance for two or more consecutive years. Received 15.03.2024. <u>LEG:</u> NO. <u>STD:</u> Not applicable. <u>SP:</u> NO – Not provided for “a”, “b” and “c”.	N/C2	P/C
2.23	<b>Date received (15.03.2024). Failed to meet reporting/submission deadlines by more than 15 days.</b> <u>LEG:</u> NO – Not submitted. Indicates it's banned by national legislation, but does not provide document or legal reference. <u>STD:</u> YES – Does not indicate banned since date. <u>SP:</u> NO – Not provided/described for a), b) and c).	N/C2	P/C

2.24	<b>Failed to implement, ensure compliance with the obligation.</b> <b>Failed to comply with the submission deadline by more than 15 days.</b> <b>Mandatory information, system / procedures not provided.</b>	N/C2	P/C
3.11	Received 26.02.2024. <b>Last update 09.03.2017</b> <u>LEG:</u> Submitted - <i>DECREE No. 20 Promulgating Law No. 19-05/AU revising the Fisheries and Aquaculture Code, Law No. 07-011/AU of August 29, 2007.</i> <u>STD:</u> NO - Missing information: terms and conditions of the coastal State fishing license. <u>SP:</u> YES – Provided for i) ii) iii).	N/C2	P/C
3.12	<b>Received 15.03.2024. Failed to meet reporting deadline by less than 15 days.</b> <b>Failed to ensure compliance for two or more consecutive years.</b> <u>LEG:</u> NO. <u>STD:</u> NO. Report not submitted. <u>SP:</u> NO – Not provided for “a”, “b” and “c”.	N/C2	N/C
5.4	Received: 29.06.2023. <b>Failed to ensure compliance of the same obligation for two or more consecutive years.</b> <u>Standard:</u> NO - No data submitted.	N/C2	N/C
5.9	Received: 29.06.2023. <b>Failed to ensure compliance of the same obligation for two or more consecutive years.</b> <u>Standard:</u> NO - Less than 1 fish/mt for some billfish and shark species.	N/C2	P/C
6.4	Failed to ensure compliance for two or more consecutive years. Received 15.03.2024. <u>LEG:</u> NO. <u>STD:</u> Not applicable. <u>SP:</u> NO – Not provided for “a”, “b” and “c”.	N/C2	P/C
6.5	Failed to ensure compliance for two or more consecutive years. Received 15.03.2024. <u>LEG:</u> NO. <u>STD:</u> Not applicable. <u>SP:</u> NO – Not provided for “a”, “b” and “c”.	N/C2	P/C
6.12	<b>Failed to ensure compliance with the same obligation for two or more consecutive years.</b> <b>Received 15.03.2024. Submitted 22 days after the deadline. Failed to meet reporting/submission deadlines by more than 15 days.</b> <b>Legislation, system / procedures not provided.</b>	N/C2	P/C

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*Note: if the table above is empty, it means there were no repeated compliance issues identified this year.*

# Reading instructions

(1) Information is to be provided in the Report of Implementation

(2) 24 meters overall length and over, and under 24 meters if they fished outside their EEZ

(Year) = year reporting on/year assessed.

**LEG:** Legislation - Transposition of Commission decisions, Legislation or administrative orders.

**STD :** Standard - Reporting format, IOTC standard

**SP:** System or procedures - Provision of information on system or procedures a) to monitor and ensure compliance of vessels and persons OR b) to prepare and submit information, data, report to the Commission.

i) ii) iii) = a) b) c)

## Assessment

### Timeliness

- **C:** Compliant
- **L:** Late
- **N/A:** Not applicable
- **N/C:** Non compliant
- **P/C:** Partially compliant

### Compliance

- **C:** Compliant
- **C/B:** Capacity building
- **N/A:** Not applicable
- **N/C1:** Not compliant 1
- **N/C2:** Not compliant 2
- **P/C:** Partially compliant

## CoC/Commission recommendations

- **Additional info or address the issue:** Provide additional information or address the compliance issue within a given period of time, and at the latest before the following annual meeting.
- **Actions proposed by the CPC:** Actions proposed by the CPC and endorsed by the Commission.
- **Investigation by the CPC:** Completion of an investigation by the CPC regarding a compliance issue and reporting back to the Compliance Committee, where required.
- **Enhanced monitoring of fleet:** Enhanced monitoring of the fleet.
- **Amendments to national rules:** Amendments to domestic procedures, legislation or policy including penalties, where required.
- **Detailed plan and timeline:** Submit, within 3 months from the end of the Commission annual session, a detailed plan and timeline on how it intends to address the non-compliance of category 2 identified.
- **Capacity building or assistance:** Provision of capacity building or technical assistance for a specified amount of time.
- **Other remedies:** Other remedies.

## “Missing” values:

- “-/-”: no possible value (e.g.: no previous assessment possible because this is the first campaign in which the requirement is assessed);
- “None”: no value provided by the Secretariat (e.g. requirement assessed as Compliant, no text provided in “Observations”);
- “Not assessed”: for timeliness and compliance when no assessment has been made yet or the requirement is not assessable;
- “-”: no information provided by the CPC for this question (e.g. nothing entered in a text entry field, no boxes checked...);
- “Not Submitted”: the value will only be available after submission of the report (e.g. the “Report date”).