



## WWF POSITION for the 28th Session of the Indian Ocean Tuna Commission

IOTC-2024-S28-NGO

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13 - 17 May 2024

### Introduction

**The Indian Ocean<sup>1</sup> is considered the second-most productive ocean, supporting the second-largest tuna fishery in the world. Unlike in other oceans, artisanal fisheries contribute to more than half (56%) of total tuna catches in the Indian Ocean.** A greater proportion of the total tuna catch (64%) is reported from the Western Indian Ocean. **Around 96% of the neritic and 40% of tropical tuna** (yellowfin, skipjack and bigeye) catch is from artisanal fisheries which supports livelihoods, economies and food security of coastal states and small-island developing states, mostly notably in Indonesia, Maldives, Iran, Sri Lanka, and India. **In addition, 70% of the IOTC membership consists of developing coastal states**, bringing diverse representation and varied objectives to tuna fisheries management which include food security, local trade, export and import, fisheries processing, access to Indian Ocean waters by foreign vessels, and employment in the fisheries processing and wild-capture fishing sectors, all of which ultimately depend on tuna populations being healthy, resilient, and sustainably managed in accordance with science-based targets.

**In 2022, according to IOTC<sup>2</sup> tropical tuna catches remained above biologically appropriate, prescribed limits. In 2022, the overall catch of all tuna and tuna-like species was reported at the highest ever of ~2,014,240 tonnes comprising 58% (1,168,453 t) of tropical tunas alone, which forms the major part of supply chains for high-value sashimi (fresh and frozen), tuna steaks or as canned products, which are destined for lucrative markets such as the EU, Japan, Korea, the UK and the USA.**

In this context, a crisis in the Indian Ocean is unfolding, with all three commercial tropical tuna species (yellowfin, bigeye and skipjack) fished beyond the agreed limits. The overall yellowfin tuna average catches from 2018-2022 is reported at 429,421 t whereas the MSY estimate is 349,000 t. Bigeye tuna catch in 2022 is reported at 102,266 t, which is above the recommended total allowable catch determined for 2024 and 2025 from the application of the bigeye tuna management procedure set at 80,583 t/year under the bigeye tuna management procedure. While skipjack is determined to be not overfished and not subject to overfishing, total catches of skipjack in 2022 (666,408 t) were 30% larger than the resulting catch from the skipjack HCR for the period 2021-2023 (513,572 t). This situation is putting the future of Indian Ocean tuna fisheries in jeopardy.

**Since 2019 the IOTC has not been able to adopt a comprehensive drifting FAD management plan, however, in 2023, WWF welcomed the adoption of drifting and anchored FAD conservation and management measures.**

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<sup>1</sup> In the Indian Ocean, gillnets (28%) contribute the highest amount of catch followed by purse seine (26%), longline (19%), line (14%), baitboat (8%) and others (3.5%)

<sup>2</sup> <https://data.iotc.org/browser/NC/SCI/>

Unfortunately, the drifting FAD measure received several objections rendering it non-binding. WWF remains deeply concerned that objections may undermine the effectiveness of adopted conservation and management measures. The fact that this measure did not ultimately enter into force because of the objections highlights the IOTC's failure to respond to long-term sustainability calls by several stakeholders (NGOs, markets and retailers) to end overfishing, and to manage tuna fisheries responsibly.

These stakeholders are also asking IOTC CPCs to improve data acquisition and sustain tuna fisheries to improve food security, livelihoods and income generation for coastal states while simultaneously implementing their own Resolution 12/01<sup>3</sup> and international commitments, such as the SDGs Agenda 2030. WWF urges **all CPCs, as a matter of urgency, to address** the declining state of tuna stocks in the Indian Ocean. As such, CPCs must adopt the following priorities at the 28<sup>th</sup> session of the Commission in May 2024:

#### Key Priorities:

- 1. Adopt a multi-annual (with a 3-year management cycle) rebuilding plan for the stock of Indian Ocean yellowfin tuna in the IOTC area of competence.**

*Recommendation: We ask the IOTC to commit to reductions in 2024 of at least 30% from 2020 levels, recognizing that the 2024 stock assessment may highlight that even further cuts are required to end overfishing by 2030.*

- 2. Adopt a comprehensive dFAD management plan to allow recovery of depleted tuna stocks.**

*Recommendation: We ask the IOTC to commit to adopting a comprehensive drifting FAD<sup>4</sup> management plan which allows development and implementation of science-based limits on FAD deployments, a FAD register for IOTC, tracking and recovery of dFADs, verification and ownership, and which phases-out existing FAD materials to biodegradable FADs.*

- 3. Adopt spatio-temporal closures by 2024 to allow recovery of depleted tuna stocks.**

*Recommendation: We ask the IOTC to commit to adoption of a three-month closure period, using the best case scenario, to reduce fishing mortality and pressure on key tropical tuna stocks (yellowfin, bigeye and skipjack) without reallocation of catch to any other gear type or vessel during the closure period.*

- 4. Strengthen conservation and management of sharks and rays in the IOTC.**

*Recommendation: We ask the IOTC to ensure that a mandatory requirement must be agreed which asks for fins naturally attached for all sharks without exceptions, and immediately adopt bycatch mitigation measures for longline fleets and adopt a ban on the use of wire traces, and/or shark lines, or both.*

#### Other Asks and Recommendations:

- 1. Continue to monitor skipjack catches and address over catch scenarios through the adoption of an appropriate multi-species harvest strategy.**

*Recommendation: WWF asks the IOTC to address the deficiencies in the harvest control rules (Res 21/01) to avoid overshooting of skipjack total allowable catch (TAC).*

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<sup>3</sup> On the implementation of the precautionary approach for management of tuna stocks, IOTC CPCs have committed to international instruments (UNFSA, UNCLOS, among others) and have a shared responsibility to manage highly migratory species and shared stocks responsibly.

<sup>4</sup> WWF promotes sustainable fishing by advocating for non-entangling, biodegradable dFADs and a comprehensive dFAD registry. This, along with fewer dFADs and protected areas, would cut bycatch and juvenile mortality, aiding stock recovery and ecosystem preservation, and ensuring economic balance for dependent nations.

2. **Continue the work on management procedures and adopt the swordfish management procedure.**  
*Recommendation: WWF asks the IOTC to adopt the MP for swordfish as a precautionary measure, and allow for investigation of localized depletion and monitor catch by gillnet fleets.*
3. **Ensure human and labour rights and safety for crew, and adopt measures to guarantee the safety and security of human observers on large-scale tuna industrial vessels.**  
*Recommendation: WWF asks the IOTC to adopt the CMM for Observer Safety and Security similar to WCPFC (CMM 2017-01 and, building on the Resolution 2018-01) and develop Labour Standards for Crew on Fishing Vessels, establishing a formal and binding CMM on crew welfare.*
4. **Improve onboard observer coverage (human or electronic, or a combination of both) to 100% by 2025 in the industrial tuna fisheries.**
5. **Improve the state of bycatch in the Indian Ocean through scientific and rigorous data collection programmes.**

## Detailed WWF Position

### **Adopt a multi-annual (lasting for at least three years) rebuilding plan for the stock of Indian Ocean yellowfin tuna in the IOTC area of competence.**

Indian Ocean yellowfin tuna has been overfished since 2014. The first rebuilding plan was adopted in 2016 and has since remained ineffective due to non-compliance and increased catches reported from exempted countries. From 2016-2020 average catches (434,383 mt) were determined to be above the estimated MSY level (403,000 mt). In 2021, an interim measure on Indian Ocean yellowfin tuna was adopted, which now supersedes previous plans (19/01, 18/01, 17/01, and 16/01). The Resolution 21/01 provides a robust framework on catch reductions and proposes an overall total allowable catch for each CPC, however, this measure has been weakened with formal objections submitted by six CPCs (India, Indonesia, Somalia, Oman, Iran, and Madagascar). While some CPCs have managed to achieve the reduction targets, those reductions were unfortunately offset by increases in catches by CPCs exempted from catch reduction or limits for yellowfin tuna. In 2023, at the 27th session of the Commission, no new measure was adopted that gave effect to having an overall 30% reduction in yellowfin tuna catches, however, Resolution 23/03 was adopted on the voluntary fishing closure for tropical tuna in the Indian Ocean.

No new stock assessment was conducted in 2023, and spawning biomass estimates have been generally declining over time and were estimated to be 87% of the level that supports the maximum sustainable yield. Current fishing mortality is estimated to be 32% higher than  $F_{msy}$ , with a high probability of 68% that the stock remains in the red kobe quadrant. The increase in catches in recent years has substantially increased the pressure on the Indian Ocean stock, resulting in fishing mortality exceeding the MSY-related levels. The MSY estimate for the Indian Ocean stock is 349,000 t with a range between 286,000-412,000 t. The 2018-2022 average catches (429,421 t) are recorded above the MSY estimated level. Although in 2021, the catch reduced by 4% as compared to 2020 levels, the 2022 catch remains substantially higher.

WWF is concerned about yellowfin tuna in the Indian Ocean, and believes that a long-term rebuilding plan must be adopted at its 28th session of the Commission, rather than negotiating a new or amended version every year which aligns with the IOTC calendar to undertake stock assessment. This is especially important considering the time it takes for several CPCs to implement and translate the adopted resolutions in national legislation is not enough for domesticating the change or to implement controls. For this purpose, WWF recommends the following:

- CPCs must reduce the overall catches of yellowfin tuna by 30% from 2020 levels (430,956 t) to ensure that catch limit is set at ~302,000 t to allow to rebuild the stocks by 2030;
- CPCs must agree to adopt a multi-annual (three-year cycle) rebuilding plan which is updated with the new stock assessment every three years;
- All CPCs must agree to conservation and management measures, such as spatio-temporal closures for depleted stocks to recover;
- WWF urges all CPCs to set the reduction targets on the basis of fairness, equity and transparency to avoid disproportionate sharing of the burden of over-catch from 2020-2023;
- All CPCs must ensure that over-catch scenarios are duly taken into account based on interim measures agreed in 2023, 2021, 2019 and 2018;
- All CPCs must adhere and abide by the catch reduction targets set forth in CMMs adopted and applicable to them.

WWF believes that agreeing and adopting an overall 30% catch reduction for yellowfin tuna in the Indian Ocean would allow for a 67% (~70%) probability of  $SSB > SSB_{msy}$  by 2030. The target reference points should be managed and maintained at or above the TRP with a probability of greater than 50%.

WWF reiterates that the road to recovery for Indian Ocean yellowfin tuna will require dramatic reductions over a period of two generations (10 years). If no action is taken, these reduction targets will dramatically increase year after year. WWF strongly encourages all CPCs to work collaboratively and be willing to make compromises for the long-term sustainability of the stocks, securing livelihoods and ensuring food security for millions of people in the Indian Ocean.

#### **Adopt a comprehensive dFAD management plan to allow recovery of depleted tuna stocks.**

In the past, the Indian Ocean region has lacked effective management of FADs. In 2023, both anchored and drifting FAD measures were adopted, however, the drifting FAD measure (Resolution 23/02) has received 11 objections as of 01/01/2024, while the anchored FAD measure has been adopted and now effective to all CPCs.

The drifting FAD measures included in Resolution 19/02 are weak and do not provide conclusive management measures for having data being made available for scientific purposes, fine-scale resolution of data on a set-by-set basis, a lower limit to reduce number of buoys (floating objects/or FADs), among others, such as transparency and traceability of dFAD operations.

WWF has remained concerned about the use of dFADs and their negative ecological impact on habitats and high fishing mortality of juvenile yellowfin tuna. The Indian Ocean drifting FAD-associated purse seine fishery has a 25% of juvenile yellowfin tuna catch as compared to the global average of 16% of all other purse seine drifting FAD-based fisheries. In the Indian Ocean, the purse seine fishery contributes to 52% of the yellowfin tuna and 77% of the bigeye tuna juveniles caught in the Indian Ocean from 2014-2021 on average. Given the likely spawner biomass independence of yellowfin tuna, the capture of juveniles has an exponential impact on the state of the stock.

WWF recommends the CPCs ensure improving the overall drifting FAD measure, reducing its environmental impact and agreeing to management measures that are complementary to stock rebuilding of bigeye and yellowfin tuna. WWF strongly believes that there is no one-size-fits-all, and that a set of solutions would need to be evaluated/assessed/agreed in tandem with the spatio-temporal closures for all gear types to reduce catch and effort, and have strong monitoring, control and surveillance. Without a strong MCS system and compliance,

the spatio-temporal closures would not be effective and there would be a need to avoid other gear types to fish during those seasons/or time frames and area.

Furthermore, WWF recommends and concludes the following:

- Reduce the use of drifting FADs, task the SC to determine the optimum number of dFADs, which is agreeable and adopted by the IOTC.
- If the science is not available, apply the precautionary principle, and agree to limiting to 100 operational FADs per fishing vessel at any given time if the stocks are not able to recover/show signs of recovery.
- CPCs must monitor the impacts on other tuna, and evaluate implications on stock health (i.e. how SSB is impacted by high fishing mortality on juvenile yellowfin tuna) due to excessive use of FADs that could lead to further overfishing of yellowfin tuna.
- CPCs shall ensure full transparency of dFAD operations, including submission of all data transmitted by operational buoys to an independent third party in near real-time, including verification and ownership, numbers, position from deployment until retrieval, species composition recorded by its size and weight, and reporting by set data.
- Develop an IOTC-wide FAD register and make it available in the public domain.
- To minimise their impacts on ETP species and broader ghost fishing impacts, no netting should be permitted in dFAD designs and all the materials used in the construction of dFADs should be fully biodegradable by the end of 2024, and ensure that 100% of all FADs deployed be retrieved.

#### **Adopt spatio-temporal closures by 2024 to allow recovery of depleted tuna stocks.**

- All CPCs must aim to agree on fisheries closures in the high seas based on the IOTC SC advice.
- Based on the science presented and the discussions undertaken at the WGFADs, WPTT and the scientific committee, there is merit in exploring adoption of spatio-temporal closures, however, these would need to be complementary to the rebuilding plan for yellowfin tuna (Resolution 21/01) and management procedure for bigeye tuna, to ensure there is overall reduction apart from spatio-temporal closures.
- Adopt a three-month fishery closure, based on the best case scenario to reduce fishing mortality and pressure on key tropical tuna stocks (yellowfin, bigeye and skipjack) without reallocation of catch to any other gear type or vessel during the closure period.
- Task the IOTC SC to undertake further analysis on spatio-temporal closures to evaluate the effects of various gear types and address uncertainties on stock recovery for depleted stocks.
- During any closure period, vessels and gear types must be strictly monitored for fishing activities through VMS, therefore strengthening the IOTC provisions for the use of VMS to be in real time and use advanced technologies.
- Ensure there is no reallocation of catch during the closure period to any other fishing gear or vessel.

#### **Strengthen conservation and management of sharks and rays in IOTC.**

Sharks are caught in association with fisheries targeting tuna and tuna-like species, and managed in IOTC as a bycatch species. The level of reporting on sharks and rays vary significantly by CPCs. In IOTC, gillnets are responsible for the majority of shark catches, which equate to 47.7% of total catch, followed by line (27.4%), and longline (15.4%). Based on the lack of data on sharks caught in association with tunas, the stock status is poorly assessed and several species lack any management advice. Given the critical status of certain shark and ray populations, it is imperative for IOTC Parties to develop recovery plans for the most endangered species. This action should be taken without delay, even in the absence of complete stock assessments from IOTC. In such instances, conservation measures should be guided by the species' global status as determined by CITES, which may take precedence over the lack of specific management advice from IOTC. The FAO Code of Conduct for Responsible Fisheries and CBD Aichi Target 6 state that recovery plans should be put into place for depleted

species. The compliance and/or implementation by CPCs on the national plan of action for sharks and rays is poor and requires immediate and urgent action ensuring that the recent CITES listings of sharks and rays call for action must not be ignored and respond to the Commission request on developing action plans on species in decline and:

- Require fins naturally attached for ALL (i.e., fresh and frozen) sharks without exceptions, adopting the globally acknowledged best practice to prevent finning.
- Urgently and with immediate effect adopt mitigation measures to reduce shark bycatch in longline fisheries, through the ban on the use of wire tracers, and/or shark lines, or both.
- Develop immediately and adopt as early as 1 January 2025, recovery/action plans for shark species (such as scalloped hammerhead, oceanic whitetip and short-fin mako) in dire need of attention, which have progressively shown signs of decline in abundance and class size. Recalling the request by the Commission to develop research plans for sharks, the Commission endorses the creation of a working group to work intersessionally to develop a series of research plans/program for sharks with scalloped hammerhead as a priority species.
- With immediate effect, amend Resolution 15/01 for each fishing gear to ensure that associated bycatch species such as hammerhead, mako, thresher sharks are reported at the species level (i.e. great hammerhead, scalloped hammerhead, short-fin mako, pelagic thresher). Build capacity among CPCs that engage in catch of tuna and tuna like-species having high catch of sharks and rays to reduce interactions and mortality by prioritising bycatch mitigation approaches.
- Continue to work with interested and affected parties to implement improved practices to ensure live and uninjured release of sharks and rays in all fisheries and call on the Scientific Committee to hold a workshop for best practice for new and innovative release techniques that can be implemented by fishing vessels.
- Continue the bycatch working group within the Kobe joint tRFMO process in order to develop and share approaches across tRFMOs to evaluate the implementation and effectiveness of bycatch CMMs.

## Other Asks and Recommendations:

### **Continue to monitor skipjack catches and address over-catch scenarios through the adoption of a robust and adequate multi-species harvest strategy.**

The discussions on management procedures for tropical tuna species have been ongoing for years, but have not been adopted. The skipjack tuna has a harvest strategy (Resolution 16/02 superseded by Resolution 23/03) through which the catch limits are determined. In 2023 IOTC undertook a stock assessment indicating that skipjack tuna stock is determined to be i) above the adopted biomass target reference point ii) not overfished and iii) not subject to overfishing. In the past, the total allowable catch limit adopted by the IOTC has been breached year after year, which is an alarming sign that conservation and management measures agreed by the Commission are not being respected and complied with. Considering the stocks remain to be in the green quadrant of the Kobe plot, the IOTC Scientific Committee continued to increase the catch limit. Based on the 2023 stock assessment, the outcome is still optimistic despite the high catches recorded in the period 2021-2022, which exceeded the catch limit. Total catches in 2022 were 30% larger than the resulting catch limit from the skipjack HCR for the period 2021-2023 (513,572 t). The increase in abundance despite catches exceeding the recommended limits was primarily driven by an increase in recent recruitment which was estimated to be well above the long-term average. Environmental conditions are viable such as the sea surface temperature, increase in recruitment, among other several factors. The catch limit calculated applying the HCR specified in Resolution

21/03 is [628, 606t] for the period 2024-2026. Moreover, certain elements must be noted and addressed by the Commission:

- Address the deficiencies in the harvest control rules (Resolution 21/03) to **avoid continued overshooting of skipjack catches**.
- Ensure effective measures are in place and harvest control rules (HCR) are triggered to avoid continued over-catch of skipjack to the total allowable catch (TAC) for 2024-2026 (at 628,606 t).
- Determine the environmental impacts of overshooting skipjack TAC and assess the extraordinary circumstances for evaluating a TAC based on HCR.
- Any decisions for skipjack must complement efforts to rebuild yellowfin tuna stocks, through close monitoring to ensure the impact of a fishery (all gears combined) cannot decrease co-dependent stocks to below MSY.
- Accelerate the process of an ecosystem-based harvest strategy approach for all tropical tuna with a drastic reduction of fishing effort, area closures, gear type provision, and evaluate the effects of spatial/seasonal closures.

Moreover, the international community has reiterated the urgent need to further integrate ecosystem approaches into fisheries conservation and management addressing bycatch, habitat destruction and overfishing<sup>5</sup>. In IOTC, a tropical tuna CMM is essential to address the unsustainable race to fish where there is no mitigating impact on the other tropical tuna species.

#### **Continue the work on management procedures and adopt the swordfish management procedure.**

The IOTC has made significant progress in the swordfish management strategy evaluation (MSE) work and is considered to be at an advanced stage where the adoption of a management procedure is possible. At the 28th session of the Commission, the MP proposal for swordfish should be adopted, which would allow for effective management for swordfish. This is crucial to ensure sustainable fishing, optimize catch stability, and maintain the stock within safe biological limits, adapting to its unique population dynamics in the Indian Ocean.

The 2023 stock assessment of swordfish presents a compelling case; data from the assessment reveals that the median spawning biomass is at a healthy 35% of the un-fished levels, with fishing mortality rates at 60% of the Fmsy level. These figures suggest that the swordfish stock is currently neither overfished nor undergoing overfishing.

However, the assessment also highlights significant regional disparities, with the southwestern region showing signs of localized depletion. This uneven distribution underscores the need for region-specific management strategies to address potential overfishing. Overall, there has been a substantial decrease in longline catch and effort from 2019-2022, a 33% reduction. Furthermore, allowing for adoption of the MP for swordfish would also mitigate against the risk of suboptimal stock performance and ensures the stocks resilience against unpredictable environmental changes or market demands, by adopting the following;

- Adopt the management procedure for swordfish as a precautionary measure
- Investigate further on localized depletion

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<sup>5</sup> See last Resolution adopted by the General Assembly on 10 December 2019. 74/18. Sustainable fisheries, including through the 1995 Agreement for the Implementation of the Provisions of the United Nations Convention on the Law of the Sea of 10 December 1982 relating to the Conservation and Management of Straddling Fish Stocks and Highly Migratory Fish Stocks, and related instruments.

- Closely monitor catches by gillnet fleets

**Ensure human and labour rights and safety for crew, and adopt measures to guarantee the safety and security of human observers on large-scale tuna vessels.**

Data acquisition and validity are key for developing effective fisheries management. It is essential that observers be deployed to gather quality data to ensure long-term sustainability of tuna stocks. In addition to ensuring that fishing takes place legally and sustainably, observers have an obligation to report illegal activities. The very nature of their responsibilities leaves them at risk of intimidation and abuse. WWF welcomes the international recognition of the dangerous nature of these crucial jobs at sea.

Yet increasing instances of fisheries observer deaths, as well as violations of fishing crew welfare, have been reported to authorities and NGOs in recent years. WWF is disturbed by this trend and takes these reports very seriously. WWF calls on CPCs to:

- Ensure vessel operators and fishery managers provide 100% transparency and accountable reports that include all aspects of fishing of public resources in general, and investigations into human and labour rights violation in particular.
- Ensure licensing authorities keep accurate records and register vessels and crew, undertaking due diligence to prevent such incidents which violate human and labour rights.
- Adopt the Conservation and Management Measure for Observer Safety and Security similar to WCPFC (CMM 2017-01 and, building on the Resolution 2018-01) and develop Labour Standards for Crew on Fishing Vessels, establishing a formal and binding CMM on crew welfare.
- Propose and adopt a new resolution for Contracting Parties to ratify and effectively/fully implement relevant conventions, such as the ILO 188, and take other measures to ensure safe and decent working and living conditions on board vessels.
- Adopt a binding measure that ensures the safety of human observers on board tuna fishing, supply and carrier vessels.

**Improve onboard observer coverage (human or electronic, or a combination of both) to 100% by 2025 in the industrial tuna fisheries.** WWF asks the Commission to require that all industrial fisheries, including supporting vessels and all those engaged in at sea transshipment are covered by **100% observer coverage** (human and/or electronic) and adopt electronic monitoring program standards and a timeline for implementation by 2025.

**Improve the state of bycatch in the Indian Ocean through scientific and rigorous data collection programmes.**

WWF is committed to the protection and conservation of sharks and rays, sea turtles, seabirds and marine mammals, and calls for more urgent action and funding to improve the protection and recovery of these key species. WWF supports the measures currently adopted by IOTC for sharks, however, the pace of management improvements is behind that required to address alarming declines in pelagic shark and ray populations in the Indian Ocean. Moreover, associated mortality of unwanted or bycatch species remains very high. It is estimated that over 100,000 cetaceans (dolphins, whales and porpoises) may be caught in the Indian Ocean tuna fisheries, whereas, for sharks and rays, sea turtles and seabirds, the associated impact from tuna fisheries remains to be undetermined.

**i) For sea turtles**

The IOTC CPCs are not compliant with data collection and reporting requirements for sea turtles and the interactions with fishing gears are not reported at the species level. It is recommended by the Scientific Committee that CPCs should declare all fisheries interactions of sea turtles at species level. The impact on sea turtle populations from fishing for tuna and tuna-like species is not assessed adequately and the available



evidence indicates that sea turtles are at considerable risk in the Indian Ocean, given they have high mortality associated with gillnet fisheries. In order to improve the status of sea turtles and respond to the risk of high mortality, following is recommended:

- Improve mandatory data collection and reporting for sea turtles at the species level by implementing the Scientific Committee advice and by making amendments to IOTC resolution 12/04.
- Call on all CPCs to investigate and urgently adopt means to reduce sea turtle bycatch at-vessels and post-release mortality in IOTC fisheries.

#### **ii) For seabirds**

- Encourage Contracting Parties to implement the measures adopted in Resolution 23/07 on seabird conservation, which include the use of hook-shielding devices as a possible mitigation measure and require that all seabirds are identified to species level.

#### **iii) For cetaceans**

WWF is concerned about the state of marine mammals in the Indian Ocean, as inaction is resulting in ongoing declines in cetacean populations. It is estimated that over 100,000 (individuals) cetaceans may be caught in the Indian Ocean tuna fisheries each year. WWF urges CPCs to:

- Encourage CPCs to implement the measures adopted in Resolution 23/06 on the conservation of cetaceans.
- Report sighting data from observer or equivalent data collection programmes to ensure that any interactions with cetaceans are reported to the IOTC.
- Work with the International Whaling Commission Bycatch Mitigation Initiative to develop and implement bycatch prevention and mitigation options for small and large cetaceans that may interact with tuna vessels.

#### **iv) Regulate and improve data reporting on driftnet fishery (less or equal to 2.5 km) in the Indian Ocean**

The United Nations General Assembly (UNGA) Resolution 46/215 called for a global moratorium on large-scale high seas driftnet fishing in 1992. Since then, UNGA regulations have been translated into an IOTC resolution 12/12 and further superseded by resolution 17/07, which prohibits the use of large-scale driftnets on the high seas and in the IOTC area of competence. However, some countries still use large-scale driftnets in both EEZ and high seas to target tuna. Based on the IOTC resolution 17/07, which came into effect on 1 January 2022, WWF calls for urgent action from developing coastal states using large-scale driftnets to show their commitment to change and to ensure that there are support systems in place for implementing the UNGA and IOTC resolutions through the national program or legislation. As of 1 January 2018, Pakistan is the only country that has submitted a formal objection to his measure. Moreover, WWF urges the following:

- All CPCs fishing primarily with large-scale driftnets reduce their net lengths to 2.5 km or less and ensure data collection and reporting to IOTC is improved significantly.
- Phase out or convert gillnet fishing vessels to other gears, considering the huge ecological impact of these gears, and fast track the implementation of Resolution 17/07, “On the Prohibition to use large-scale driftnets in the IOTC.”
- IOTC undertook a socio-economic study to determine the main drivers of the fishery, its economic implications and gear selectivity, building a strong rationale and justification to transition the driftnet fisheries.
- All CPCs engaged in catching large pelagics using gillnets/driftnets, including tuna, are encouraged to have a time closure on the use of gillnets for at least two months, from 0000 hours, 1 June until 0000 hours, 30 July of each year.

- WWF encourages CPCs engaged in catch of tuna primarily with drift gillnets to work alongside other CPCs and IOTC secretariat among other key stakeholders to transform gillnets and collectively work on proposing a new CMM regulating gillnets in the IOTC area of competence while adopting best practices for reduced bycatch.

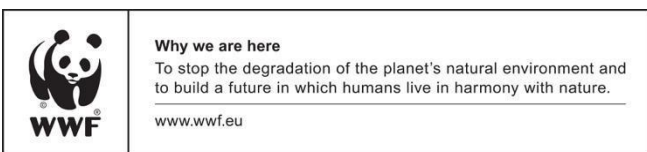
## Conclusion

WWF remains concerned about the state of tropical and neritic tuna management in the Indian Ocean. Efforts made at the Commission meeting in the past few years (2021-2023) to improve the conservation and management of tuna have resulted in objections. WWF encourages all CPCs to come together with clear commitments at the 28th annual session.

WWF is committed to support the developing coastal states in improving data collection, reducing impact of fisheries on ETP species, phasing out gillnets, and ensuring overall health of the ocean is improved through a robust recovery/rebuilding plan for yellowfin tuna, which are ultimately managed at a biological limit.

Considering the current state of play, WWF urges that all these rules of the game be developed through a management procedure ahead of time, rather than being subjective and adopted on an ad-hoc basis. WWF recommends advancing science in order to move towards an ecosystem-based approach.

WWF remains committed to the long-term sustainability of ocean resources and securing its vitality for food security, ocean resilience, ecosystem health and means of income generation and jobs for coastal communities.



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