

**Statement to the 28th Session of the Indian Ocean Tuna Commission
Bangkok, Thailand 13-17 May 2024**

The Pew Charitable Trusts welcomes the opportunity to participate as an observer in the 28th Session of the Indian Ocean Tuna Commission (IOTC). We appreciate the work of the Secretariat, Chair, and members to continue to convene the annual Commission meeting in a hybrid format.

The Commission has faced a number of challenges in negotiating contentious measures in recent years, and this has resulted in an increasing number of objections to adopted conservation and management measures (CMMs). This undermines the ability of the Commission to effectively manage the stocks under its mandate. The ease with which members can lodge objections and the increasing frequency with which members are using this option are very concerning for the future direction of the Commission. ***We encourage all members to urgently negotiate solutions to the outstanding difficult issues so that consensus can be reached, resulting in full implementation and more effective management.***

We also urge members to hasten the introduction of new approaches that provide greater resilience and stability to the region's fisheries, and encourage them to:

- **Advance sustainable fisheries management through the development, adoption and full implementation of management procedures.**

We support the template proposals for [skipjack](#) and [swordfish](#) management procedures (MPs) and urge the Technical Committee on Management Procedures (TCMP) to complete the proposals based on their deliberations, recommending suitable candidate MPs that will maintain the stocks at healthy levels with a high probability. ***The Commission must therefore take this tremendous opportunity to select and adopt a Management Procedure for both skipjack and swordfish.***

Yellowfin tuna has been classified as overfished since 2015, yet to date, none of the five measures adopted have succeeded in reducing catch sufficiently to even end overfishing let alone begin rebuilding the stock. Almost a decade of overfishing is unacceptable. The Commission should seek to revise Resolution 21/01 in a manner that will immediately end overfishing. Because a yellowfin MP will provide IOTC with the tools necessary to both rebuild the population and eventually maintain a sustainable, profitable, and predictable fishery, finalizing the management strategy evaluation (MSE) should be prioritized for 2025. The Commission should therefore ***revise Res. 21/01 to immediately end overfishing and outline steps to complete the MSE to enable MP adoption in 2025.***

Blue shark is a key commercially important species caught by IOTC fisheries with 10,000s of tonnes landed annually. As such they should be managed sustainably. [Proposal V](#) provides just such an opportunity and should be capitalized on. ***The Commission should therefore instigate development of a fully tested management procedure for commercially important shark species, starting with blue shark.***

Rebuilding yellowfin and fully implementing management procedures for key IOTC stocks is more important now than ever and central to the very credibility of IOTC management.

➤ **Increase observer coverage, including through the use of electronic monitoring systems**

Low levels of observer coverage limit the collection of independent catch and operational data, reducing the accuracy of stock assessments and effectiveness of conservation and management measures. The Commission currently requires only 5% observer coverage for vessels larger than 24 meters operating within its Convention Area, well below the scientifically recommended level. The adoption of electronic monitoring standards in 2023 provides a clear pathway to increase this coverage and improve the amount and quality of data used for management decisions. ***The Commission should support [Proposal I](#), which would require a gradual increase of observer coverage to 100% for purse seine and supply vessels and to 20% for longline vessels, as well as clarify the role of electronic monitoring in improving data collection.***

➤ **Strengthen monitoring, control, and surveillance (MCS) to reduce opportunities for illegal, unreported, or unregulated (IUU) fishing activities**

IOTC's 2nd Performance Review states that "the sense of accountability within IOTC seems to be very low; therefore more accountability is required". A high seas boarding and inspection (HSBI) scheme is intended to monitor compliance and will help ensure compliance with the provisions of the Convention and CMMs adopted by the Commission. Similar measures have been adopted by other RFMOs including by WCPFC in 2006, which has proven successful in monitoring the waters of the Convention area efficiently through the pooling of resources, and by the Southern Indian Ocean Fisheries Agreement (SIOFA). Furthermore, it is worth noting that a 2022 FAO Legal Office advice to IOTC's Compliance Committee concludes that IOTC "can adopt measures such as boarding and inspection on the high seas." ***The Commission should therefore adopt [Proposal L](#) to allow for a HSBI scheme across the whole convention area and bring IOTC into line with modern international fisheries management.***

The Commission must also continually work to close management gaps that present opportunities for IUU fishing in the IOTC area of competence. Vessel monitoring systems (VMS) and catch documentation schemes (CDS) represent essential MCS tools for fisheries management. But progress in both working groups has been too slow and recent meetings were postponed without adequate explanation, hindering yet again progress on these matters. The current VMS resolution (Res 15/03) must be updated to build a more centralized system. ***The Commission must further encourage and support the work of the VMS and CDS Working Groups to deliver proposals for consideration at the Commission meeting in 2025.***

Resolution 07/01 promotes compliance by nationals of CPCs with IOTC conservation and management measures. However, the resolution, in its current form, fails to address what is often the root cause, those that benefit but are not directly acting in IUU activity. Two proposals seek to remedy this: [Proposal W](#) by amending Res 18/03; and [proposal X](#) by amending Res 07/01. ***The Commission should therefore adopt resolution amendments requiring CPCs to investigate and verify allegations and/or reports that their nationals are responsible for, benefiting from or supporting such activities, and to take appropriate, effective and deterrent action when such activities are verified.***

Resolution 19/04 mandates the submission of comprehensive information on the beneficial owner (BO) of a fishing vessel – the person or entity who profits most from the vessel’s activities. However, implementation of this requirement is severely lacking and inconsistent. ***The Commission should ask the Compliance Committee to intensify efforts to better understand and resolve obstacles in order to improve and eventually achieve full compliance.***

Fishing has long been known as one of the world’s most dangerous professions with a recent [study](#) finding that more than 100,000 fishing-related deaths occur each year—three to four times previous estimates. Furthermore, vessels with substandard safety and working conditions for fishers and observers are frequently linked to IUU fishing activities¹. Yet no official data are collected on incidents at sea, despite reports of fatalities in the IOTC Convention area. ***The Commission should therefore require regular data collection and reporting on safety and labour-related incidents that occur in the Convention Area and consider establishing an ad hoc working group on safety and labour. These could be based on the best practices developed in other RFMOs such as WCPFC and ICCAT.***

➤ **Prepare for overlap with other international treaties**

To date RFMOs have largely been unaffected by obligations in other international treaties. However, this is changing with new treaties being signed that will require input from RFMOs such as the United Nations High Seas Treaty and the World Trade Organisation (WTO) Subsidies Agreement. To prepare for these and other obligations, ***the Commission should establish a standing agenda item to discuss overlapping issues or ways it can assist CPCs meet their obligations under other treaties.***

¹ 4th FAO/ILO/IMO Joint Working Group meeting on IUU Fishing and other related matters