ASSOCIATION OF NATIONAL ORGANISATIONS
OF FISHING ENTERPRISES IN THE EU

EUROPECHE TUNA GROUP priorities for the 28th session of the IOTC

(13th – 17th May 2024, Bangkok, Thailand)

Brussels, May 6th 2024

1. Achieving sustainable management of Indian Ocean tuna stocks

- **Tropical tuna: yellowfin, skipjack and bigeye**

ETG calls CPCs to cooperate and adopt catch limits for the effective management of the **tropical tuna species** by:

1. Accelerating the adoption of a **robust Management Procedure for yellowfin tuna** and ensuring that all parties are bound by the Resolution 21/01 rebuilding plan to achieve the yellowfin tuna catch reductions that the measure targets.
2. Ensuring **skipjack catches do not exceed the limit** set by Harvest Control Rule (HCR) in Resolution 21/03 and adopting a **comprehensive Management Procedure for skipjack** tuna by 2025.
3. Ensuring **bigeye catches do not exceed the limit** set by Resolution 23/04, according to its Management Procedure in Resolution 22/03 .

Europêche Tuna Group (ETG) advocates integrating progressively all measures into a unique resolution, including Harvest Control Rules, Management Procedures, gear related and Fish Aggregating Devices (FAD, anchored and drifting) management measures, as well as implementation, surveillance, monitoring and control elements. Doing so and promoting a multispecies approach would ensure on the middle term an exhaustive view of the fisheries, including by-catch, and a coherent management, designed to avoid the current weak compliance processes, which promote free riding in the IOTC.

- **Billfish and neritic tuna species**

ETG calls CPCs to urgently address the lack of sustainable fishing of **billfish and neritic tuna species**.

Blue marlin, stripped marlin, longtail tuna and narrow-barred tuna, mainly fished with gillnets, longlines and handlines, are overfished and subject to overfishing; Kawakawa is overfished. Black marlin, bullet tuna and frigate tuna's stock status are unknown. The Commission needs to provide mechanisms to ensure the maximum annual catches, where any, are respected.

2. Ensuring an operational and equitable management of fleets and gears

- **Yellowfin tuna recovery plan**

ETG urges CPCs to **eliminate the objections, and all apply the recovery plan for yellowfin tuna** as an absolute prerequisite to any additional management measure for tropical tuna. A few fleets, and essentially EU purse seiners, cannot keep on bearing the burden of other fleets dramatic and uncontrolled catches' increase.

While the Commission has adopted Resolution 21/01 on an interim plan for the rebuilding of the yellowfin stock, several Contracting Parties or Cooperating Non-Contracting Parties (CPCs) have opposed the plan and do not apply its catch limits and reductions: Indonesia, Madagascar, Oman, Iran, India and Somalia have objected the Resolution. In its 26th session report, the Scientific Committee reminds that any management measure's efficiency is bound to a full acceptance and application:

> Some of the fisheries subject to catch reductions have achieved a decrease in catches in 2021 in accordance with the levels of reductions specified in the Resolution; however, these reductions were offset by increases in the catches from CPCs exempt from and some CPCs subject to limitations on their catches of yellowfin tuna."[1]

ETG reminds that its purse seine fleet has fully applied the rebuilding plan for Indian ocean's yellowfin tuna and reduced its catches accordingly throughout the eight years of application of this measure.

- **Fishery closure**

ETG recommends that **any fishery closure directed at reducing yellowfin tuna catches would be proportionate to the goal and timeframe decided, and applicable to all gears and fleets**. Clear indicators shall be set to evaluate the closure efficiency and its socio-economic impacts, studied within the Working Group on socioeconomics.

Interrogated by the Commission, IOTC's Scientific Committee has studied several and ranked three scenarios of fishery closure: (i) a three-month complete closure for all gears, (ii) a two-month complete closure for all gears, and (iii) a three-month purse seine DFADs closure with

[1] Table 1 of the report, p.13, yellowfin tuna

a 10-year time would have the most positive impact on the tuna species stocks. However, the SC also noted that:

> "These benefits were estimated under the assumption that there would not be an increase in catches from other gears during this time and further noted that the full benefits of these closures would only been seen if there is no reallocation of catches to other gears or time periods."

The Scientific Committee therefore:

> "Recommended the Commission to take these analyses into account […] and requested the Working party on tropical tunas to consider conducting further analysis intersessionally to assess the impacts of all gears on stock status so that this issue can be comprehensively addressed".

It is also important to note that, in evaluating the impact of closures, Correa *et al*. (2023)[2] noted that:

> "The base scenario produced a stock status in the red quadrant by the terminal year of the projection period, while the TAC scenario moved it to the yellow quadrant, very close to the MSY benchmark."

ETG reminds that purse seine catches represent only a third of the yellowfin tuna catches in the Indian Ocean: large purse-seine directed measures alone will never ensure yellowfin tuna's stock recovery. Other gears, that represent nearly 70% of the yellowfin tuna catches and for which catch trends have been increasing, must participate to the IOTC's global effort.

Socio-economics consequences of any fisheries closure, including a FAD closure, not only for fleets but also on coastal developing states and small-islands developing states, shall also be studied in the Working Group on socioeconomics, as they could be devastating. The Macroeconomic impact of an international fishery regulation on a small island country conducted by Guillotreau et al (2024) could be extended to other states and fisheries.

- **FAD management**

ETG recommends **transposing IATTCs Resolution C-23-04**, adopting its definition of "biodegradable", the categories, and the timelines set.

To ensure coherence among FAD-users as well as to facilitate and accelerate research on FAD biodegradability, those shall be standardized among RFMOs.

ETG considers it unfair to ask purse seiners to make further efforts, including on FAD number reduction, and unrealistic to establish a FAD-register without Regional VMS register associated.

- **Bycatch and discards**

ETG recommends **extending IOTC** Resolution 19/05 on a ban on discards of bigeye tuna, skipjack tuna, yellowfin tuna, and non- targeted species caught by purse seine vessels in the IOTC area of competence, to all vessels and fishing gears targeting tropical tunas.

[2] IOTC-2023-WGFAD05-13.pdf

Failure to report non-retained catch data render the catch database even less complete, which has serious consequences for evaluating the status of the stocks and makes observer data even more crucial. Bycatch and discards data actually reported to IOTC has been extremely poor, and although it is improving in some areas, it remains very limited for bycatch species.

3. Promoting transparency and fighting against IUU

- **Observer coverage**

ETG recommends:

1. As a first step, **raising the observer coverage (human and/or electronic) up to 25%** of the fishing effort for all fishing vessels in the IOTC Record of Authorized Vessels.
2. Setting up schemes to **monitor catches of artisanal fisheries at the landing place**, in order to validate the figures reported.
3. Imposing a **full-observer coverage on at sea-transhipments** for both cargo and fishing vessels, without any derogation.
4. Adopting a binding measure that will ensure the **safety of human observers**, including those on supply and carrier vessels.

Only 5% observer coverage, for offshore fleets, is mandatory in IOTC while science recommends reaching at least 20% observer coverage. In addition, during its 23rd session, the Scientific committee expressed its concern on the low observer level at 2,15% for the Regional Observer Scheme and on the fact that there is no coverage of the artisanal fleet, which comprise a large portion of catches taken in the Indian Ocean[3].

ETG reminds that EU purse seine fleets implement 100% observer coverage (human and/or electronic) of their fishing effort.

- **Monitoring, control and surveillance**

ETG recommends adopting amendments to Resolution 15/03 to **strengthen the IOTC VMS**, including by requiring simultaneous near real-time position reporting and temper-proof systems, and by implementing a **regional tool under IOTC's secretariat control**.

While the European and associated purse seine fleets are all registered and monitored, IOTC accounts for only a fraction of the activity in its area of competence and provides no indication of the total days of vessels' activity in its official list. Only vessels larger than 24 metres in length overall or in case of vessels less than 24m, those operating in waters outside the economic

[3] Point 143 of the report of the 23rd session of the IOTC Scientific Committee: IOTC-2020-SC23-RE_Rev1.pdf

exclusive zone of the flag State, are declared in the IOTC Record of Active Vessels[4]. Artisanal and industrial fleets less than 24 metres operating exclusively in EEZs, including purse seiners and longliners, are not even subject to a number of vessels' declaration. Considering that for example in the case of yellowfin tuna, artisanal fisheries alone are responsible for around 60% of the catches, this undermines the quality of catches declarations, including level of active fishing capacity, as well as by-catch estimations, stock assessments and fleets monitoring.

Only a regional VMS tool would allow to verify vessels' activity and their correct registration in the IOTC record, in order to ensure applicability and monitoring of tuna conservation measures, such as seasonal closures for all gear types or FAD register.

More generally, high sea inspections are also required to ensure that vessels comply with IOTC rules, as required by the United Nations Agreement relating to the Conservation and Management of Straddling Fish Stocks and Highly Migratory Fish Stocks[5].

- **Revised compliance assessment process**

ETG recommends that in implementing its revised compliance assessment process, the Compliance Committee:

1. Must **address CPC non-compliance with catch limits and with the use of driftnets**.
2. Shall provide a **response to the issue of systematic total catches in excess of the agreed catch limits of skipjack tuna**, set firstly on the superseded Resolution 16/02 and then on the currently in force Resolution 21/03.
3. Shall **require CPCs to submit action plans that address identified non-compliance**.

The revised compliance assessment process shall urgently address large-scale driftnets non compliances. Resolution 17/07 On the Prohibition to Use Large-Scale Driftnets in the IOTC Area prohibits the use of driftnets, which are gill nets exceeding 2.5 kilometres in size, in accordance with the driftnet ban adopted by the United Nations in 1992. Despite those two resolutions, driftnets' use is still overspread in the Indian Ocean. The IOTC has consistently ignored non-compliance, which relates mainly to activities of vessels from Iran, Pakistan (which objected the measure while having an important driftnet fishery), Sri Lanka, and India. All those countries have objected other IOTC measures. In recent years, gillnets have been responsible for around 15% (60,000 tons) of the catches of yellowfin tuna, many of which are believed to have been harvested using driftnets.

[4] Obligation under Resolution 19/04 Concerning the establishment of an IOTC record of vessels authorized to operate in the IOTC area

[5] In force as from 11 December 2001; Article 21 on Subregional and regional cooperation in enforcement provides that "1. In any high seas area covered by a subregional or regional fisheries management organization or arrangement, a State Party which is a member of such organization or a participant in such arrangement may, through its duly authorized inspectors, board and inspect […] fishing vessels flying the flag of another State Party to this Agreement" and that "2. States shall establish, through subregional or regional fisheries management organizations or arrangements, procedures for boarding and inspection […]".