

Indian Ocean Tuna Commission (IOTC) Catch Documentation Scheme (CDS) Concept Paper  
(supplementary paper on key decisions)

12 March 2025

The CDS Concept Paper was prepared for consideration by the CDS-WG. The Concept Paper reflects a consolidation of the consideration of CDS over the past ten years and includes:

- an overall description and design of the IOTC CDS (including the e-CDS); and
- a draft *Resolution on an Indian Ocean Tuna Commission (IOTC) Catch Documentation Scheme (CDS)*.

The description of the IOTC CDS provides the *Objective, Goals* and *Scope* of the CDS. These reflect the decisions of the CDS-WG to date including as recorded in the *IOTC Catch Documentation Scheme Strategy (Version 4.0)* and the *IOTC Catch Documentation Scheme Strategy Companion (Version 1.0)*. While it is understood that the key elements of the IOTC CDS have been agreed, and thus informed the design of the IOTC CDS, some substantive issues appear to remain.

There is a priority need for IOTC to identify and agree to, the critical management and conservation issues facing IOTC species and fisheries and therefore what are the best measures that could be adopted to address these issues. CDS is one option but may not be the most suitable in all cases.

The FAO Voluntary Guidelines on CDS define CDS as “*a system with the primary purpose of helping determine throughout the supply chain whether fish originate from catches taken consistent with applicable national, regional and international conservation and management measures, established in accordance with relevant international obligations*”.

There does seem agreement, for some priority species at least, that CDS is required. However, IOTC needs to reach a final agreement on what species and fisheries the CDS will apply to, i.e., the scope.

There seems to be broad agreement that CDS should apply to Yellowfin tuna (*Thunnus albacares*), Skipjack (*Katsuwonus pelamis*), Bigeye tuna (*Thunnus obesus*) and Swordfish (*Xiphias gladius*) caught and landed by CPC-flagged vessels included on the IOTC Record of Authorised Vessels.

However, there was a desire for this to be implemented in a phased approach, the first phase only applying to fish that are landed *and* exported from the port of landing and then to all fish landed.

For a CDS to be effective, it should apply to all catch of included species to the greatest extent possible. Therefore, there is a need for IOTC to ensure that eventually, the CDS applies to Yellowfin tuna (*Thunnus albacares*), Skipjack (*Katsuwonus pelamis*), Bigeye tuna (*Thunnus obesus*) and Swordfish (*Xiphias gladius*) by vessels *not* included on the IOTC Record of Authorised Vessels, i.e., small scale vessels.

If this cannot be achieved, the effectiveness of the CDS will be undermined and it may not meet agreed objectives and goals and IOTC.

The application of CDS to other IOTC Species seems to be the issue of considerable concern for several members and needs to be agreed.

The objective of the CDS seems broadly agreed:

*The Objective of the IOTC CDS is to ensure that [species covered by the Agreement for the Establishment of the Indian Ocean Tuna Commission (IOTC Species)], fished, landed and traded by IOTC CPCs are caught in a manner consistent with IOTC Conservation and Management Measures (CMMs).*

The scope is included in this objective (square brackets) and while the intent of the objective seems agreed, the scope needs further consideration.

The goals of the CDS seem broadly agreed:

*To support the overall Objective of the IOTC CDS has several Goals including to:*

- *reduce illegal, unreported and unregulated (IUU) fishing and trade in illegally caught products by preventing IUU fish and fish products entering markets;*
- *improve the quality and availability of catch-related data and information including to support fisheries management;*
- *identify the origins of IOTC species entering markets and to ensure the traceability of fish and fish products;*
- *promote cooperation between IOTC CPCs and with non-Contracting Parties (NCPs) that trade in IOTC Species; and*
- *promote cooperation between IOTC and other tuna regional fisheries management organisations (RFMOs) that implement CDS.*

While there is agreement to the goals, there seems to be a lack of acceptance regarding what is required in the design of CDS (and e-CDS) to achieve these. Therefore, IOTC needs to further consider and agree to what the objective and goals of the CDS, work to develop a shared understanding of what is needed to meet these and agree to a design that ensures the CDS will be effective.

Considering and refining the description, design and draft Resolution provided in the CDS Concept Paper, may not be the best use of time while the issues described above remain.

Several participants of the CDS-WG noted e-CDS developments in ICCAT and CCSBT. It is worth noting that while these CDS are tuna-based, it does not necessarily mean they provide a good model for IOTC. Particularly as they are being developed from a paper-based CDS.