



IPNLF Position Statement

29th Annual Session of the Indian Ocean Tuna Commission

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The International Pole & Line Foundation (IPNLF) is an international NGO, working to develop and demonstrate the value of one-by-one tuna fisheries to thriving coastal communities. Our organisation's principal aim is to improve the wellbeing of coastal fisheries, and the people and seas connected with them through environmentally and socially responsible one-by-one fishing methods, such as pole-and-line, troll, and handline. We work across science, policy and the seafood supply chain to achieve this.

At this year's Annual Session of the Indian Ocean Tuna Commission (S29), IPNLF urges the Commission to take the following steps to ensure both environmentally sustainable and socially responsible fisheries management in the Indian Ocean:

Yellowfin tuna

- Given the uncertainty over the CPUE standardisation used for the 2024 yellowfin tuna stock assessment, the IOTC must continue with steps to **resolve data transparency issues** in the stock assessment.
- While the stock assessment is reviewed and potentially updated, it is essential that the IOTC **set a precautionary catch limit** for yellowfin tuna.
- Moreover, previous IOTC yellowfin CMMs have been plagued by objections. The IOTC must seek to **agree on a catch limit free from objections**, to ensure that the limits are respected and protect the stock.
- Catch limits must be **equitable** and uphold the rights of local fleets and small-scale fisheries to access and benefit from tuna stocks in their waters.

Skipjack tuna

- The IOTC Scientific Committee noted in 2023 and 2024 that skipjack recruitment had been abnormally high in recent years, apparently due to environmental conditions, but that this period of high environmental productivity is estimated to have ended in early 2024. Therefore, IPNLF emphasises the importance of **precautionary management** to ensure that the skipjack stock remains in good



health during this new phase of lower environmental productivity. IPNLF commends the proponents of PropY for introducing skipjack catch limits, which is an important step forward to effective management, and calls on the Commission to continue its efforts to ensure that adopted catch limits reflect a precautionary approach.

- IPNLF further highlights that overall skipjack catches have regularly exceeded the catch limits adopted by the Commission. In 2022 catches were 33% higher than the limits from the harvest control rule applicable over the 2021-2023 period. As such, IPNLF calls for a clear **commitment that catch limits will not be surpassed**.

Ensure accountability for IUU fishing

- There must be equal **accountability for IUU fishing** across all fleets, without positive discrimination towards any specific gear.
 - Purse seine fisheries must take **full responsibility for drifting FADs entering prohibited areas**. IPNLF therefore supports the proposal by Somalia (PropH) to remove discrimination in the IOTC's IUU vessel listing process.
- The IOTC must continue to **strengthen its measures on transshipment** and IPNLF supports in principle the transshipment proposals by Korea and the EU (PropA and PropO) which aim to strengthen the IOTC regime for transshipment. However, the IOTC should be moving towards prohibiting transshipment to minimise associated risks, in line with best practice.
- IPNLF further supports the proposal to adopt an IOTC **high seas boarding and inspection** measure.

Shark Conservation Efforts

- There are numerous proposals on sharks presented to S29. IPNLF stresses the importance of adopting a CMM both **requiring fins naturally attached** and **prohibiting the use of wire leaders**.
- Any resolution on shortfin mako sharks **must establish and fully allocate shortfin mako shark catch limits** that result in **rebuilding the stock within 10 years with at least a 60% probability**. Measures to implement catch reductions must therefore be aimed at the main fleets catching shortfin mako: EU (Spain) (43.6% of catches), Pakistan (25.2%), and EU (Portugal) (12.4%). IPNLF also calls for work on the development of a harvest strategy for shortfin mako.



FAD management

- The IOTC must continue to ensure effective **mitigation of the destructive impacts of drifting FAD** fisheries.
- While IPNLF supports retrieval of drifting FADs, it is likely that the creation of a new vessel category of 'DFAD retrieval vessels' will **undermine the limits on supply vessels** set out in paragraph 44 of Resolution 24/02 and therefore represent continuing effort creep by the purse seine fleet. It will not be possible to effectively monitor whether 'DFAD retrieval vessels' only engage in retrieval activities or also serve as additional supply vessels.

Reporting

- IPNLF support continued efforts to ensure **complete and timely data reporting**. This includes proposals to expand the scope of mandatory statistical reporting, requirements to notify coastal States when vessels enter their EEZ, beyond transiting, and clarification of data reporting timelines as part of the Regional Observer Programme (PropS, PropW, PropM, respectively).

Crew labour standards

- Forced labor and other human rights abuses are widespread in tuna fisheries globally. Last year the WCPFC led the way by adopting the first-ever set of binding crew labor standards in an international regional fisheries management organisation. IPNLF calls on the IOTC to work towards the adoption of similar crew labour standards, noting the critical importance of ensuring **better protection of workers in seafood supply chains**.

Biodiversity beyond national jurisdiction

- As momentum builds towards the entry into force of the *Agreement under the United Nations Convention on the Law of the Sea on the Conservation and Sustainable Use of Marine Biological Diversity of Areas beyond National Jurisdiction* (BBNJ Agreement), the **IOTC must prepare itself** for the institutional impact of this new treaty apparatus. PropR provides a way forward in this regard to implement much-needed protection for the high seas of the Indian Ocean.