

IOTC-2025-S29-pCR04 (Provisional)-Comoros [E]

2025 **Provisional** Compliance Report for: Comoros

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Notes:

Requirements that do not apply to the CPC (by exclusion) are not included in the PDF version of this report.

Acronyms and definitions can be consulted [on the last page](#) of the Compliance Report.

Req. n°	Source (para n°) (year)	Information required	Deadline	Current status	Observations	CPC remarks	CPC Follow-up and/or Remedial actions/CoC-COM Rec(s)
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1. Implementation obligations

1.1	Art. X Agreement (2024)	Report of Implementation	12/2/2025	P/C	Received: - 1 day after the deadline. STD: NO - Implementation Report NOT provided at IOTC Standard, Missing sections in Part C.		Other remedies We are committed to meeting the deadlines for requirements and reports. For Part C, we had internal issues at the ministry level.
1.2	Rules of Proc. (4.1) (2024)	Compliance Questionnaire	23/1/2025	P/C	Received 24.02.2025. 12 days after the deadline. STD:NO - Compliance questionnaire NOT provided in the agreed format/at IOTC Standard, Missing some sections.	-	Actions proposed by the CPC, Other remedies Unless we are mistaken, we note that once a requirement is met late, it is not included in the relevant report for updating. This explains the various parties' failures in reporting. We are committed to meeting the deadlines for requirements and reports.

2. Management Standards

2.7b	Res. 15/01	Coastal catch recording system	23/1/2025 (Since 2016)	N/C2	Failed to implement, ensure compliance with the same obligation for two or more consecutive years.	-	Actions proposed by the CPC, Other remedies
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	(11) (2024)				<p>Mandatory information, legislation, system / procedures not provided. Received 24.02.2025. LEG: NO - Not submitted/provided. STD: NO - No implementation of data/catch recording system for vessel below 24m operating in EEZ. SP: NO - CPC has NO system / procedure to monitor compliance with this binding measure, AND NO action in relation to potential infringements. OBS: Has declared: The boats currently used for fishing operations have an average length of less than 7 meters. It is practically difficult to establish a registration system for these types of boats.</p>		Given the nature of our fleet, this requirement will always remain non-compliant. The boats currently used have an average length of 6 meters instead of 7 meters.
2.8	Res. 17/07 (2) (6) (2024)	Ban on large-scale driftnets IOTC Area & MCS actions large-scale driftnets IOTC Area	12/2/2025	N/C2	<p>Received 25.02.2025. 13 days after the deadline. LEG: NO – Not implemented. Legislation under development. STD: YES. SP: NO - CPC has NO system / procedure to monitor compliance with this binding measure, AND NO action in relation to potential infringements.</p>	However, this fishing technique is not used in the national fleet.	<p>Actions proposed by the CPC, Amendments to national law We are committed to meeting the deadline for this requirement. Legislation currently being developed.</p>
2.13	Res. 16/07 (1&2) (2024)	Prohibition surface, submerged artificial lights to attract fish	23/1/2025	N/C2	<p>Received 24.02.2025 - More than 15 days after the deadline. LEG: NO - Not submitted, in two or more consecutive years. SP: NO - Not provided & described for i) ii) iii).</p>	-	<p>Actions proposed by the CPC, Amendments to national law We are committed to meeting the deadline for this requirement. Legislation currently being developed.</p>
2.14	Res. 16/08 (1) (2024)	Prohibition aircrafts & unmanned aerial vehicles	23/1/2025	N/C2	<p>Received 24.02.2024. 32 days after the deadline. Failed to implement, ensure compliance with the same obligation for two or more consecutive years. LEG: NO - Has reported " NIL Report / Not Applicable - CPC has NO fishing vessel, support and supply vessel operating in the IOTC Area of Competence". According to the IOTC Interactive Data Browser, Comoros has an artisanal fleet fishing for tuna species and is therefore under the scope of Resolution 16/08. SP: NO – NO system / procedure to monitor compliance with this binding measure, AND NO action in relation to potential infringements.</p>	-	<p>Actions proposed by the CPC, Amendments to national law We are committed to meeting the deadline for this requirement. Indeed, the Comoros have an artisanal fleet fishing for tuna species, but the use of aircraft and unmanned aerial vehicles is almost non-existent. Legislation is currently being developed.</p>
2.21	Res. 18/07 (1)	Report actions taken implement reporting obligations & im-	12/2/2025	P/C	<p>Received 24.02.2025 - Less than 15 days after the deadline.</p>	-	<p>Amendments to national law Legislation currently being developed.</p>

	(2024) (2024)	prove data collection of catches			STD: YES - Report on actions taken to implement reporting obligations & improve data collection of catches in 2024 provided.		
2.22	Res. 11/02 (6) (2024)	Reports observations damaged data buoys	12/2/2025	N/C2	Received 11.03.2025. 27 days after the deadline. Failed to implement, ensure compliance with the same obligation for two or more consecutive years. LEG: NO - Has reported " NIL Report / Not Applicable - CPC does not have fishing vessels operating in the IOTC Area of Competence". According to the IOTC Interactive Data Browser, Comoros has an artisanal fleet fishing for tuna species and is therefore under the scope of Resolution 11/02. SP: NO – NO system / procedure to monitor compliance with this binding measure, AND NO action in relation to potential infringements.	-	Actions proposed by the CPC We are committed to meeting the deadline for this requirement.
2.23	Res. 11/02 (2) (2024)	Prohibition intentionally fishing within 1 nautical mile/inter-acting data buoy	23/1/2025	N/C2	Received 24.02.2024. 32 days after the deadline. Failed to implement, ensure compliance with the same obligation for two or more consecutive years. LEG: NO - Has reported " NIL Report / Not Applicable - CPC does not have fishing vessels operating in the IOTC Area of Competence". According to the IOTC Interactive Data Browser, Comoros has an artisanal fleet fishing for tuna species and is therefore under the scope of Resolution 11/02. SP: NO – NO system / procedure to monitor compliance with this binding measure, AND NO action in relation to potential infringements.	-	Actions proposed by the CPC, Amendments to national law We are committed to meeting the deadline for this requirement. Legislation is currently being developed.
2.24	Res. 11/02 (3) (2024)	Prohibition taking on board data buoy	23/1/2025	N/C2	Received 24.02.2024. 32 days after the deadline. Failed to implement, ensure compliance with the same obligation for two or more consecutive years. LEG: NO - Has reported " NIL Report / Not Applicable - CPC does not have fishing vessels operating in the IOTC Area of Competence". According to the IOTC Interactive Data Browser, Comoros has an artisanal fleet fishing for tuna species and is therefore under the scope of Resolution 11/02. SP: NO – NO system / procedure to monitor compliance with this binding measure, AND NO action in relation to potential infringements.	-	Actions proposed by the CPC, Amendments to national law We are committed to meeting the deadline for this requirement. Legislation is currently being developed.

2.27	Res. 19/03 (2) (2024)	Prohibition intentionally setting any gear type on mobulid rays	23/1/2025	N/C2	Received 24.02.2025 - More than 15 days after the deadline. LEG: NO - Not submitted, in two or more consecutive years. SP: NO - Not provided & described for i) ii) iii).	-	Actions proposed by the CPC, Amendments to national law We are committed to meeting the deadline for this requirement. Legislation is currently being developed.
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3. Reporting on Vessels

3.8	Res. 14/05 (1) (2024)	List of foreign vessels licensed in EEZ	15/2/2025	N/C2	Received 11.03.2025. 29 days after the deadline. Failed to implement, ensure compliance with the same obligation for two or more consecutive years. STD: NO - 2024 List of foreign flag vessels issued licences in the EEZ NOT provided in the agreed format/at IOTC Standard, in two or more consecutive years. Mandatory information missing. Has used the template of Resolution 19/04 instead of Resolution 14/05.	-	Other remedies, Actions proposed by the CPC We had internal problems at the ministry level, which explains the failure to meet the deadline. We will comply with the model of Resolution 19/04.
3.9	Res. 14/05 (6) (2024)	Foreign vessels denied a licence	15/2/2025	N/C1	Received 04.03.2025. More than 15 days after the deadline. The CPC has failed to meet a reporting or submission deadline by more than 15 days. STD: YES - 2024 information on license denial 2024 and denial reasons provided, in the agreed format/at IOTC Standard. Foreign vessels were NOT denied license following application for license to fish in EEZ.	-	Actions proposed by the CPC We are committed to meeting the requirements deadlines.
3.11	Res. 14/05 (7 & 8) (2024)	Official coastal State fishing License	23/1/2025	N/C2	Last update 09.03.2017 STD: NO - Missing information: terms and conditions of the coastal State fishing license.	-	-
3.12	Res. 21/01 (26) (2024)	List of vessels fishing for yellowfin tuna	15/2/2025	N/C2	Failed to ensure compliance for two or more consecutive years. Has coastal catch history of YFT. STD: NO - 2024List of vessels, which have fished for yellowfin tuna in the IOTC area of competence NOT provided in the agreed format/at IOTC Standard, in two or more consecutive years.	-	Additional info or address the issue We have currently integrated the vessel identifier into the collection system. In the coming years, we will be able to identify registered vessels that have fished for albacore.

4. Vessel Monitoring System

5. Mandatory statistical requirement – Flag State CPCs

5.1	Res 18/07 (4) (2023)	Nominal catches / Zero Catch Matrix – All Fisheries (Species presence in the catch)	30/6/2024	N/C2	Received: 30.06.2024 & 24.02.2025. STD: NO - Data not aligned with 1RC for some species/gears. Failed to ensure compliance for two or more consecutive years.	-	Capacity building or assistance We believe that the completion of the 1RC form is misunderstood.
5.6	Res 15/02 (1, 5) (2023)	Size Frequencies Geo-referenced – Coastal/surface/longline fisheries	30/6/2024	N/C2	STD: NO - Data NOT provided by IOTC standards, in two or more consecutive years. Less than 1 fish per metric tonne for some species.	-	Additional info or address the issue Collection staff is reinforced to increase the quantity of species measured

6. Implementation of mitigation measures and bycatch of non-IOTC species

6.1	Res. 17/05 (3) (2024)	Prohibition on sharks finning	23/1/2025 (Since 2017)	P/C	LEG: YES - Code of Fisheries and Aquaculture (Decree No .15-050, Article 35). SP: NO - NOT Provided & described for i) ii) iii).	-	Amendments to national law Legislation currently being developed.
6.2	Res. 12/09 (2) (2024)	Prohibition on thresher sharks - all species of family Alopiidae	23/1/2025 (Since 2010)	N/C2	Received 11.03.2025, more than 15 day after the deadline LEG: NO - Not submitted/provided, in two or more consecutive years. SP: NO - NOT Provided & described for i) ii) iii), in two or more consecutive years.	-	Amendments to national law, Actions proposed by the CPC Legislation is currently being developed. We are committed to meeting the deadline for this requirement.
6.4	Res. 19/03 (3) (2024)	Prohibition to retain onboard, tranship, land, store mobulid rays	23/1/2025 (Since 2019)	N/C2	Received 11.03.2025, more than 15 day after the deadline LEG: NO - Not submitted/provided, in two or more consecutive years. SP: NO - NOT Provided & described for i) ii) iii), in two or more consecutive years.	-	Actions proposed by the CPC, Amendments to national law Legislation is currently being developed. We are committed to meeting the deadline for this requirement.
6.5	Res. 19/03 (5, Annex 1) (2024)	Prohibition to gaff, lift by the gill slits/spiracles, punch holes through the bodies. Obligation to release alive, implementation of live release handling procedures of mobulid rays	23/1/2025 (Since 2019)	N/C2	Received 11.03.2025, more than 15 day after the deadline. LEG: NO - Not submitted/provided, in two or more consecutive years. SP: NO - NOT Provided & described for i) ii) iii), in two or more consecutive years.	-	Actions proposed by the CPC, Amendments to national law Legislation is currently being developed. We are committed to meeting the deadline for this requirement.
6.10	Res 18/05 (5) (2024)	Prohibition to retain on board, tranship, land, any Striped Marlin, Black Marlin, Blue Marlin, Indo-pacific Sailfish small-	23/1/2025 (Since 2018)	N/C2	Received 13.03.2025. 49 days after the deadline. Failed to implement, ensure compliance with the same obligation for two or more consecutive years.	-	Actions proposed by the CPC, Amendments to national law Legislation is currently being developed. We are committed to meeting the deadline for this requirement.

		er than 60 cm Lower Jaw Fork Length			LEG: NO - Comores declares that the obligation has not been implemented and that an legal Order is in progress. SP: NO - Declares that there is no SP in place to monitor compliance with this binding measure, and no action in relation to potential infringements.		
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7. Illegal, Unreported and Unregulated (IUU) Vessels

8. Transhipments

9. Observers

9.3	Res. 22/04 (9) (2023)	5% landings coverage artisanal fishing vessels	17/11/2024	P/C	LEG: NO - Not provided. STD: YES - Mandatory coverage achieved, according to Form 1-RC. SP: NO - Not provided & described for i) ii) iii).	-	Amendments to national law Legislation currently being developed.
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10. Statistical document programme

11. Port inspection

Pursuant to Annex A of Appendix V, of the Rules of Procedure (2023), for all requirements assessed as N/C2, the concerned CPCs “*shall submit, within 3 months from the end of the Commission annual session, a detailed plan and timeline on how it intends to address the non-compliance of category 2 identified*”. The deadline for submission was the 17 August 2024.

The non-compliance of category 2 identified (N/C2) at the previous session of the Compliance Committee (CoC21), were for Comoros :

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The Compliance Action Plan was :

Not received

If the submission of the Compliance Action Plan was required/applicable, the date of reception was :

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Summary of Comoros 2025 compliance assessment (CoC22)

Compliant (C)	Partially Compliant (PC)	Non-compliant category 1 (NC1)	Non-compliant category 2 (NC2)	Not Applicable (NA)	Capacity building in progress (CB)	Compliance Rate (%)
9	5	1	17	54	0	28.1

Current issues on the level of implementation by Comoros of IOTC Conservation and Management Measures identified for discussion in the CoC22 in 2025

Having reviewed the 2025 Summary Compliance Report for Comoros, the Compliance Committee has identified the following significant repeated non-compliance issues for discussion.

Repeated non-compliance issues

Requirement	Information required	Observations	Previous status (2024)	Current status (2025)
1.1	Report of Implementation	Received: - 1 day after the deadline. STD: NO - Implementation Report NOT provided at IOTC Standard, Missing sections in Part C.	P/C	P/C
1.2	Compliance Questionnaire	Received 24.02.2025. 12 days after the deadline. STD: NO - Compliance questionnaire NOT provided in the agreed format/at IOTC Standard, Missing some sections.	N/C1	P/C
2.7b	Coastal catch recording system	Failed to implement, ensure compliance with the same obligation for two or more consecutive years. Failed to implement, ensure compliance with the same obligation for two or more consecutive years. Mandatory information, legislation, system / procedures not provided. Received 24.02.2025. LEG: NO - Not submitted/provided. STD: NO - No implementation of data/catch recording system for vessel below 24m operating in EEZ. SP: NO - CPC has NO system / procedure to monitor compliance with this binding measure, AND NO action in relation to potential infringements. OBS: Has declared: The boats currently used for fishing operations have an average length of less than 7 meters. It is practically difficult to establish a registration system for these types of boats.	N/C1	N/C2
2.8	Ban on large-scale driftnets IOTC Area & MCS actions large-scale driftnets IOTC Area	Received 25.02.2025. 13 days after the deadline. LEG: NO – Not implemented. Legislation under development. STD: YES. SP: NO - CPC has NO system / procedure to monitor compliance with this binding measure, AND NO action in relation to potential infringements.	N/C2	N/C2
2.13	Prohibition surface, submerged artificial lights to attract fish	Received 24.02.2025 - More than 15 days after the deadline. LEG: NO - Not submitted, in two or more consecutive years. SP: NO - Not provided & described for i) ii) iii).	N/C1	N/C2
2.14	Prohibition aircrafts & unmanned aerial vehicles	Received 24.02.2024. 32 days after the deadline. Failed to implement, ensure compliance with the same obligation for two or more consecutive years. LEG: NO - Has reported " NIL Report / Not Applicable - CPC has NO fishing vessel, support and supply vessel operating in the IOTC Area of Competence". According to the IOTC Interactive Data Browser, Comoros has an artisanal fleet fishing for tuna species and is therefore under the scope of Resolution 16/08. SP: NO – NO system / procedure to monitor compliance with this binding measure, AND NO action in relation to potential infringements.	N/C2	N/C2

2.21	Report actions taken implement reporting obligations & improve data collection of catches	Received 24.02.2025 - Less than 15 days after the deadline. STD: YES - Report on actions taken to implement reporting obligations & improve data collection of catches in 2024 provided.	P/C	P/C
2.22	Reports observations damaged data buoys	Received 11.03.2025. 27 days after the deadline. Failed to implement, ensure compliance with the same obligation for two or more consecutive years. LEG: NO - Has reported " NIL Report / Not Applicable - CPC does not have fishing vessels operating in the IOTC Area of Competence". According to the IOTC Interactive Data Browser, Comoros has an artisanal fleet fishing for tuna species and is therefore under the scope of Resolution 11/02. SP: NO – NO system / procedure to monitor compliance with this binding measure, AND NO action in relation to potential infringements.	N/C1	N/C2
2.23	Prohibition intentionally fishing within 1 nautical mile/interacting data buoy	Received 24.02.2024. 32 days after the deadline. Failed to implement, ensure compliance with the same obligation for two or more consecutive years. LEG: NO - Has reported " NIL Report / Not Applicable - CPC does not have fishing vessels operating in the IOTC Area of Competence". According to the IOTC Interactive Data Browser, Comoros has an artisanal fleet fishing for tuna species and is therefore under the scope of Resolution 11/02. SP: NO – NO system / procedure to monitor compliance with this binding measure, AND NO action in relation to potential infringements.	N/C2	N/C2
2.24	Prohibition taking on board data buoy	Received 24.02.2024. 32 days after the deadline. Failed to implement, ensure compliance with the same obligation for two or more consecutive years. LEG: NO - Has reported " NIL Report / Not Applicable - CPC does not have fishing vessels operating in the IOTC Area of Competence". According to the IOTC Interactive Data Browser, Comoros has an artisanal fleet fishing for tuna species and is therefore under the scope of Resolution 11/02. SP: NO – NO system / procedure to monitor compliance with this binding measure, AND NO action in relation to potential infringements.	N/C2	N/C2
3.8	List of foreign vessels licensed in EEZ	Received 11.03.2025. 29 days after the deadline. Failed to implement, ensure compliance with the same obligation for two or more consecutive years. STD: NO - 2024 List of foreign flag vessels issued licences in the EEZ NOT provided in the agreed format/at IOTC Standard, in two or more consecutive years. Mandatory information missing. Has used the template of Resolution 19/04 instead of Resolution 14/05.	N/C1	N/C2
3.11	Official coastal State fishing License	Last update 09.03.2017 STD: NO - Missing information: terms and conditions of the coastal State fishing license.	N/C2	N/C2
3.12	List of vessels fishing for yellowfin tuna	Failed to ensure compliance for two or more consecutive years. Has coastal catch history of YFT. STD: NO - 2024 List of vessels, which have fished for yellowfin tuna in the IOTC area of competence NOT provided in the agreed format/at IOTC Standard, in two or more consecutive years.	N/C2	N/C2
5.1	Nominal catches / Zero Catch Matrix – All Fisheries (Species presence in the catch)	Received: 30.06.2024 & 24.02.2025. STD: NO - Data not aligned with 1RC for some species/gears. Failed to ensure compliance for two or more consecutive years.	P/C	N/C2
5.6	Size Frequencies Geo-referenced – Coastal/sur-	STD: NO - Data NOT provided by IOTC standards, in two or more consecutive years. Less than 1 fish per metric tonne for some species.	N/C2	N/C2

	face/longline fisheries			
6.1	Prohibition on sharks finning	LEG: YES - Code of Fisheries and Aquaculture (Decree No .15-050, Article 35). SP: NO - NOT Provided & described for i) ii) iii).	N/C1	P/C
6.2	Prohibition on thresher sharks - all species of family Alopiidae	Received 11.03.2025, more than 15 day after the deadline LEG: NO - Not submitted/provided, in two or more consecutive years. SP: NO - NOT Provided & described for i) ii) iii), in two or more consecutive years.	N/C1	N/C2
6.4	Prohibition to retain onboard, tranship, land, store mobulid rays	Received 11.03.2025, more than 15 day after the deadline LEG: NO - Not submitted/provided, in two or more consecutive years. SP: NO - NOT Provided & described for i) ii) iii), in two or more consecutive years.	N/C2	N/C2
6.5	Prohibition to gaff, lift by the gill slits/spiracles, punch holes through the bodies. Obligation to release alive, implementation of live release handling procedures of mobulid rays	Received 11.03.2025, more than 15 day after the deadline. LEG: NO - Not submitted/provided, in two or more consecutive years. SP: NO - NOT Provided & described for i) ii) iii), in two or more consecutive years.	N/C2	N/C2
6.10	Prohibition to retain on board, tranship, land, any Striped Marlin, Black Marlin, Blue Marlin, Indo-pacific Sailfish smaller than 60 cm Lower Jaw Fork Length	Received 13.03.2025. 49 days after the deadline. Failed to implement, ensure compliance with the same obligation for two or more consecutive years. LEG: NO - Comores declares that the obligation has not been implemented and that an legal Order is in progress. SP: NO - Declares that there is no SP in place to monitor compliance with this binding measure, and no action in relation to potential infringements.	N/C2	N/C2
9.3	5% landings coverage artisanal fishing vessels	LEG: NO - Not provided. STD: YES - Mandatory coverage achieved, according to Form 1-RC. SP: NO - Not provided & described for i) ii) iii).	N/C1	P/C

Note: if the table above is empty, it means there were no repeated compliance issues identified this year.

Comments by the Compliance Committee or Commission

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Reading instructions

(1) Information is to be provided in the Report of Implementation

(2) 24 meters overall length and over, and under 24 meters if they fished outside their EEZ

(Year) = year reporting on/year assessed.

LEG: Legislation - Transposition of Commission decisions, Legislation or administrative orders.

STD : Standard - Reporting format, IOTC standard

SP: System or procedures - Provision of information on system or procedures a) to monitor and ensure compliance of vessels and persons OR b) to prepare and submit information, data, report to the Commission.

i) ii) iii) = a) b) c)

Assessment

Compliance

- **C:** Compliant
- **C/B:** Capacity building
- **N/A:** Not applicable
- **N/C1:** Not compliant 1
- **N/C2:** Not compliant 2
- **P/C:** Partially compliant

CoC/Commission recommendations

- **Additional info or address the issue:** Provide additional information or address the compliance issue within a given period of time, and at the latest before the following annual meeting.
- **Actions proposed by the CPC:** Actions proposed by the CPC and endorsed by the Commission.
- **Investigation by the CPC:** Completion of an investigation by the CPC regarding a compliance issue and reporting back to the Compliance Committee, where required.
- **Enhanced monitoring of fleet:** Enhanced monitoring of the fleet.
- **Amendments to national rules:** Amendments to domestic procedures, legislation or policy including penalties, where required.
- **Detailed plan and timeline:** Submit, within 3 months from the end of the Commission annual session, a detailed plan and timeline on how it intends to address the non-compliance of category 2 identified.
- **Capacity building or assistance:** Provision of capacity building or technical assistance for a specified amount of time.
- **Other remedies:** Other remedies.

“Missing” values:

- **-/-**: no possible value (e.g.: no previous assessment possible because this is the first campaign in which the requirement is assessed);
- **None**: no value provided by the Secretariat (e.g. requirement assessed as Compliant, no text provided in “Observations”);
- **Not assessed**: for timeliness and compliance when no assessment has been made yet or the requirement is not assessable;
- **-**: no information provided by the CPC for this question (e.g. nothing entered in a text entry field, no boxes checked...);
- **Not Submitted**: the value will only be available after submission of the report (e.g. the “Report date”).