



14 August 2025

IOTC CIRCULAR 2025-26

Dear Madam / Sir

OBJECTION FROM INDIA TO IOTC RESOLUTIONS 25/03, 25/04, 25/08 AND 25/09

Please find attached a communication from India regarding its objections, in accordance with Article IX (5) of the IOTC Agreement, to:

- Resolution 25-03 *On establishing catch limits for skipjack tuna in the IOTC area of competence* [[download here](#)]
- Resolution 25-04 *On establishing catch limits for bigeye tuna in the IOTC area of competence* [[download here](#)]
- Resolution 25-08 *On the conservation of sharks caught in association with fisheries managed by IOTC* [[download here](#)]
- Resolution 25-09 *On the conservation of shortfin and longfin mako sharks caught in association with IOTC fisheries* [[download here](#)]

which were adopted at the 29th Session of the IOTC.

An extension period of 60 days will therefore be applied to the entry into force of Resolutions 25/03 and 25/04. Thus they will now enter into force on the 21 October 2025, unless a total of more than one-third of the members also object before this time. Resolutions 25/08 and 25/09 will enter into force on the 1 January 2026 in accordance with the provisions specified in those Resolutions.

The relevant paragraphs (5, 6 and 7) of Article IX on the ensuing process are reproduced herein for your reference.

5. Any Member of the Commission may, within 120 days from the date specified or within such other period as may be specified by the Commission under paragraph 4, object to a conservation and management measure adopted under paragraph 1. A Member of the Commission which has objected to a measure shall not be bound thereby. Any other Member of the Commission may similarly object within a further period of 60 days from the expiry of the 120-day period. A Member of the Commission may also withdraw its objection at any time and become bound by the measure immediately if the measure is already in effect or at such time as it may come into effect under this article.

6. If objections to a measure adopted under paragraph 1 are made by more than one-third of the Members of the Commission, the other Members shall not be bound by that measure; but this shall not preclude any or all of them from giving effect thereto.

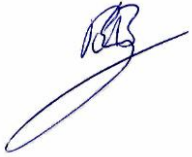
7. The Secretary shall notify each Member of the Commission immediately upon receipt of each objection or withdrawal of objection.

Distribution

IOTC Contracting Parties: Australia, Bangladesh, China, Comoros, European Union, France (Territories), India, Indonesia, Iran (Islamic Rep of), Japan, Kenya, Rep. of Korea, Madagascar, Malaysia, Maldives, Mauritius, Mozambique, Oman, Pakistan, Philippines, Seychelles, Somalia, South Africa, Sri Lanka, Sudan, United Rep. of Tanzania, Thailand, United Kingdom, Yemen. **Cooperating Non-Contracting Parties:** Liberia, Panama. **Intergovernmental Organisations, Non-Governmental Organisations.** Chairperson IOTC. **Copy to:** FAO Headquarters, FAO Representatives to CPCs.

This message has been transmitted by email only

Yours sincerely

A handwritten signature in blue ink, appearing to be 'PB', with a long, sweeping horizontal line extending to the right.

Paul de Bruyn
Executive Secretary

Attachment:

- letter from India



DR. SANJAY PANDEY
Deputy Commissioner (Fisheries)
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Government of India
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Department of Animal Fisheries
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File No: j-26001/23/2024-Fy

Dated the 13th August 2025

To,
The Executive Secretary
Indian Ocean Tuna Commission (IOTC)
Abis Centre, Providence
P.O. Box 1011
Victoria, Seychelles
Email: iotc-secretariat@fao.org

Subject: Objection from India to IOTC Resolutions 25/03, 25/04, 25/08 and 25/09 pursuant to Article IX (5) of the IOTC Agreement.

Dear Dr. Paul de Bruyn,

The Government of India presents its compliments to the Secretariat of the Indian Ocean Tuna Commission (IOTC) and refers to the adoption of the following Resolutions during the Commission's 2025 annual session:

- Resolution 25/03 on Establishing Catch Limits for Skipjack Tuna
- Resolution 25/04 on Establishing Catch Limits for Bigeye Tuna
- Resolution 25/08 on the Conservation of Sharks Caught in Association with Fisheries Managed by the IOTC
- Resolution 25/09 on the Conservation of Shortfin and Longfin Mako Sharks

In accordance with the provisions of Article IX (5) of the IOTC Agreement, the Government of India hereby formally registers its objections to the aforementioned Resolutions.

India acknowledges the importance of sustainable fisheries and supports robust, science-based conservation and management measures (CMMs) that are effective, equitable, and inclusive. However, India believes that the above Resolutions, as currently adopted, pose significant challenges to the livelihoods and legitimate fishing rights of small-scale and artisanal fishers, especially those operating within our Exclusive Economic Zone (EEZ). These concerns are articulated below:

1. Resolution 25/03 – On establishing catch limits for skipjack tuna in the IOTC area of competence

India acknowledges the importance of IOTC Resolution 25/03, aimed at ensuring the long-term sustainability of skipjack tuna. However, we are deeply concerned about its implications for small-scale and artisanal fishers in developing coastal states. In India, skipjack tuna is primarily harvested by traditional, low-impact fisheries within the EEZ - especially in communities like Lakshadweep - where it sustains thousands of livelihoods.

The current resolution applies uniform targets across all IOTC members, irrespective of historical contribution to overfishing or current catch levels. A uniform catch reduction, without distinction between large-scale industrial fleets and small, subsistence-based operations, risks

penalising those who have contributed least to overfishing. India believes this undermines the core principles of equity, Common But Differentiated Responsibilities (CBDR), and the special recognition accorded to small-scale fisheries under international instruments including the FAO Voluntary Guidelines for Securing Sustainable Small-Scale Fisheries and the UN Fish Stocks Agreement.

India remains fully committed to the conservation of skipjack tuna. However, this must be achieved in a manner that is just, inclusive, and development-oriented. The livelihoods, food security, and rights of artisanal fishers in developing countries must not be collateral in the pursuit of regional sustainability.

2. Resolution 25/04 – On establishing catch limits for bigeye tuna in the IOTC area of competence

Although this resolution currently does not impose binding catch limits on minor harvesters (CPCs with <2,000 t annual catch), it introduces a threshold (2,300 t in two consecutive years) that could potentially trigger binding limits.

India reiterates that its bigeye tuna catch is exclusively by artisanal and small-scale fisheries operating within national jurisdiction. We are concerned that undue restrictions on such low-impact fisheries may be counterproductive, especially when they provide critical employment and food for millions of coastal dwellers. The resolution does not account for the developmental needs and historical underutilisation of tuna resources by coastal developing States - an imbalance that must be addressed to ensure equitable access.

3. Resolution 25/08 – On the conservation of sharks caught in association with fisheries managed by IOTC

India remains committed to the conservation of vulnerable shark species and has taken national initiatives to that effect. However, the blanket prohibition on retention and gear modifications places an unrealistic compliance burden on small-scale and artisanal fishers, particularly those without access to mechanised gear or scientific infrastructure.

India had strongly recommended limiting the application of such provisions to industrial vessels (OAL >24 meters or smaller vessels operating in the high seas). Unfortunately, these considerations were not taken into account during adoption. The traditional gear used by artisanal fishers often cannot be swiftly or economically modified, and a failure to distinguish between industrial and artisanal contexts risks driving these communities into economic vulnerability and non-compliance by default.

4. Resolution 25/09 – On the conservation of shortfin and longfin mako sharks caught in association with IOTC fisheries

India is similarly concerned with the blanket retention ban on mako sharks, which applies even when the sharks are incidentally caught and already dead at haulback in small-scale fisheries within national waters. Further, the requirement of observer coverage or electronic monitoring is not practically feasible for small-scale fishers, who operate from traditional vessels without onboard facilities or resources.

India had urged for the Resolution to exempt small-scale and artisanal vessels operating exclusively within EEZs, yet our concerns were not accommodated. These provisions impose

unintended punitive consequences on marginalised fishers whose capacity for adaptation is limited.

India has consistently championed the cause of small-scale and artisanal fisheries in regional and international fora, including the IOTC. Our coastal fishing communities - comprised of millions of fishers, and dependents, many of whom belong to historically marginalised groups - represent a cornerstone of sustainable development, blue economy, and food sovereignty in the Indian Ocean region.

These communities play a minimal role in global fishing pressure, yet face disproportionate regulatory burden through Resolutions that do not distinguish between industrial and traditional operations. This is inconsistent with:

- Article 24 of the United Nations Fish Stocks Agreement (UNFSA), which calls for due consideration to the special requirements of developing States in relation to the conservation and management of straddling fish stocks and highly migratory fish stocks, including their participation in fisheries for these stocks.
- Goal 14.b of the Sustainable Development Goals (SDGs), which mandates access for small-scale artisanal fishers to marine resources and markets;
- Article XVI of the IOTC Agreement, on coastal states rights;
- The principles of equity, differentiated responsibilities, and sovereign rights under UNCLOS.

India therefore cannot support Resolutions that result in catch reductions, gear bans, or monitoring obligations that unduly affect vessels under 24 meters operating exclusively within national jurisdiction.

India respectfully submits this formal objection to Resolutions 25/03, 25/04, 25/08, and 25/09 under the provisions of Article IX(5) of the IOTC Agreement. India had strongly recommended limiting the application of provisions under these Resolutions to industrial vessels (OAL >24 meters or smaller vessels operating in the high seas). Unfortunately, these considerations were not taken into account during adoption. We urge the Commission to re-examine these Resolutions and revise them in a manner that recognises the realities of small-scale and artisanal fisheries in developing coastal States.

India remains committed to constructive engagement with the IOTC and its Members and reiterates our willingness to collaborate toward science-based, inclusive, and equitable fisheries governance that protects both marine biodiversity and the communities who depend on it.

Please accept, the assurances of our highest consideration.

Yours sincerely,



(Dr. Sanjay Pandey)
Deputy Commissioner (Fisheries)
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डॉ. संजय पाण्डेय
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