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## Global Fishing Watch position statement to the 30th Session of the Indian Ocean Tuna Commission

Global Fishing Watch extends its gratitude to the Indian Ocean Tuna Commission (IOTC) for the opportunity to participate in the IOTC as an observer. We thank the Chair, Members, Secretariat, and the Republic of the Maldives for hosting this landmark 30th session.

Global Fishing Watch works to advance transparency of human activity at sea by providing publicly available data and tools that support science, management and cooperation. As this is Global Fishing Watch's first in-person IOTC meeting as an accredited observer, we look forward to supporting and discussing technical and policy matters with CPCs centered around monitoring, control and surveillance (MCS). **This position statement outlines Global Fishing Watch's recommended priorities for IOTC30:**

### I. Improve vessel tracking in the IOTC

*Global Fishing Watch recommends further amendments to Resolution 25/02 to modernize vessel tracking in the IOTC Area of Competence and address other vessel monitoring gaps:*

#### Recommendations:

- **Adopt “Proposal M” by the Seychelles** to mandate Automatic Identification Systems (AIS) under Resolution 25/02 On the Vessel Monitoring System (VMS) Programme. Global Fishing Watch is pleased to see proposed requirements for AIS as a complementary tool to VMS and encourages the Commission to adopt this measure. Particularly given the lack of a centralized VMS in the IOTC, adopting AIS offers additional publicly-accessible verification for the Area of Competence.

- If Proposal M is adopted, also **amend Resolution 19/04** to add MMSI number as a mandatory field for all vessels required to carry AIS, enabling direct linkage between the IOTC Record and satellite AIS tracking systems. This will ideally also apply to an additional subset of vessels under 24m LOA of a vessel class size to be determined.
- **Agree to develop a timeline intersessionally towards centralized VMS adoption** at IOTC31: As continued progress towards consideration of centralized VMS, CPCs should agree to develop a timeline intersessionally to be presented and adopted at IOTC31. In doing so, this would work towards flag CPCs being required to share VMS positions with the IOTC Secretariat on a near-real-time basis, enabling the Secretariat to identify reporting gaps and support monitoring.
- **Tighten monitoring of transshipment activity in the IOTC** by requiring that carrier vessels maintain active AIS under Resolution 25/05. This will also reinforce compliance with Resolution 25/11 On Port State Measures to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing, which includes AIS use as a condition in prioritizing inspections.

**Background:** IOTC Resolution 25/02 *On the Vessel Monitoring System (VMS) Programme* requires VMS for vessels of 24 metres or above and for smaller vessels operating outside the flag State's EEZ. While VMS remains the cornerstone of IOTC vessel monitoring, the current framework has well-documented limitations: the system is fully decentralised, with flag CPCs retaining sole access to their vessels' data.

AIS—originally mandated under the IMO SOLAS Convention for vessels of 300 GT and above on international voyages—operate on open, internationally standardised frequencies and provide a publicly accessible tracking signal. AIS complements VMS by providing independent positional verification, supporting cross-referencing of declared port calls and maintaining vessel visibility during VMS failures.

Further mandating AIS under 25/02 under Proposal M would promote both enhanced vessel transparency in the absence of a centralized system and near real-time compliance monitoring. Precedent for using AIS already exists in the IOTC, which references AIS in **Resolution 24/03** on the IUU vessel list as a tool to identify vessels presumed to engage in IUU fishing and as an inspection tool under **Resolution 25/05**. This approach is also aligned with recent progress under the Cape Town Agreement in 2026, which establishes binding safety standards for fishing vessels and reinforces efforts to combat IUU fishing.

## II. Progress beneficial ownership implementation at CoC23

*The IOTC leads other RFMOs in terms of the number of CMMs requiring or promoting beneficial ownership, but implementation gaps remain. Global Fishing Watch recommends the Compliance Committee:*

### Recommendations:

- **Prioritise a comprehensive review** of the level of implementation of the existing beneficial ownership reporting requirements, report to IOTC31 on the proportion of authorized vessels for which beneficial ownership (BO) data has been submitted and identify capacity-building needs with a view to address existing implementation gaps (please see paper IOTC-2026-S30-NGO09).
- **Encourage intersessional knowledge exchange** under Resolution 19/04 On the Record of Vessels Authorised to Operate in the IOTC Area of Competence, including through dedicated technical sessions led by compliant CPCs, and where appropriate, involve relevant experts to enable CPCs to share their procedures and best practices for collecting beneficial ownership information.
- **Task the WPICMM with considering revisions to Resolution 24/03** On Establishment Of A List Of Vessels Presumed To Have Carried Out Illegal, Unreported And Unregulated Fishing In The IOTC Area Of Competence to require BO reporting in 2027. Unlike other t-RFMOs, the IUU measure does not currently require BO reporting.

**Background:** An emerging and critical pillar of fisheries transparency is the public disclosure of BO information. Beneficial owners are the natural persons who ultimately own or exercise effective control over a fishing vessel, often through complex corporate structures, shell companies, or multi-flag arrangements. At its 2025 Council Meeting at Ministerial Level, for example, the OECD formally adopted a Recommendation on eliminating government support to illegal, unreported and unregulated (IUU) fishing. Critically, the OECD recognised the role of BO transparency in achieving this objective, suggesting that countries should provide support only to vessels for which information on beneficial owners is available.

IOTC Resolution 19/04 already requires CPCs to submit information on beneficial owners as part of the data fields for each authorised fishing vessel. Specifically, paragraph 3 of Resolution 19/04 requires the submission of the "name and address of beneficial owner" as one of the mandatory data fields. Furthermore, Resolution 19/04 paragraph 11(d) requires CPCs to ensure that where a vessel has a history of IUU fishing, the previous owners and operators have "no legal, beneficial or financial interest in, or control over those vessels." IOTC is the only tRFMO to require this information for authorized vessels, but implementation of this requirement remains uneven amongst CPCs.

### III. Increase transparency for vessels under 24 meters in length

*While many requirements in the IOTC apply to vessels 24m length overall (LOA) or above, substantial fishing effort and catch in the IOTC come from vessels under this vessel size threshold [1, 2, 3]. To help close these information gaps for vessels under 24m LOA, Global Fishing Watch recommends the IOTC:*

#### Recommendations:

- **Improve transparency, monitoring and data reporting of IOTC fishing vessels** by extending the vessel size threshold under CMM 19/04. To this effect, Global Fishing Watch encourages consideration of the EU's "Proposal D" and that the Commission consider a phased implementation approach to require smaller vessels be listed under the RAV.
- **Reflect UN Sustainable Fisheries Resolution 80/109 (4)** that notes the importance of transparency in effective fisheries management into relevant CMMs, such as 19/04 and the preamble of 15/02. Thus, we support the proposed additions to the preamble in the Maldives' "Proposal L" and encourage further additions from Resolution 80/109 paragraph 101 into Proposal L.

#### Conclusion

These recommendations offer specific pathways towards closing transparency gaps, strengthening compliance and enhancing the IOTC's monitoring and enforcement framework. Global Fishing Watch stands ready to support IOTC Members, the Secretariat, and the Compliance Committee in implementing these measures to advance transparency in the Indian Ocean.



