



FEDERAL GOVERNMENT OF SOMALIA
MINISTRY OF FISHERIES AND BLUE ECONOMY
OFFICE OF THE DIRECTOR GENERAL

Reference: MFBE/ODG/00129/26

Date: 03/10/2026

Dr. Paul de Bruyn
Executive Secretary
Indian Ocean Tuna Commission
Victoria, Seychelles

Subject: Somalia's Position on Priorities for TCAC17 from Tue, 13/10/2026 - 11:00 to Wed, 14/10/2026 - 15:00

Dear Executive Secretary,

The Federal Republic of Somalia refers to the Chair's communication concerning the work of the Technical Committee on Allocation Criteria and recalls its earlier submission circulated through IOTC Circular 2025-41.

Somalia supports the continuation of the TCAC process. However, an allocation regime can command legitimacy only if its foundational legal and equity questions are resolved before numerical criteria are negotiated.

First, Somalia does not support the inclusion of fishing opportunities within exclusive economic zones in a Commission-wide allocation system. IOTC conservation competence must not be confused with ownership or allocation of resources under national jurisdiction. The sovereign rights of coastal States under Article 56 of UNCLOS and Article XVI of the IOTC Agreement must remain fully protected.

Catches taken by foreign vessels within a coastal State's EEZ must not be treated as flag-State high-seas catch history. Historical access to another State's EEZ cannot mature into a permanent allocation entitlement against that coastal State.

Second, artisanal and small-scale fisheries operating within national jurisdiction should remain outside the regional allocation and payback system. Their exclusion would not remove them from conservation responsibilities. Their management would remain the responsibility of the coastal State, consistent with food security, livelihoods, and sustainable fisheries management.

Third, historical catch cannot operate only as a source of entitlement. It must also carry responsibility. CPCs and fleets that derived the greatest benefit from past exploitation and contributed disproportionately to stock decline should bear a

correspondingly greater share of rebuilding reductions. Developing coastal States that contributed least to depletion should not surrender their future development opportunities to preserve historical advantages created by others.

The absence of historical catch data from developing coastal States must not be converted into permanent allocation disadvantage. Data scarcity is not evidence of an absence of rights, resource endowment or legitimate fishing aspirations.

Accordingly, Somalia proposes that TCAC18 prioritize two balanced matters:

1. The separation of EEZ and high-seas fishing opportunities, including the treatment of foreign-vessel catches and the exclusion of artisanal and small-scale fisheries from regional allocation and payback arrangements.
2. An equitable allocation framework combining biomass distribution, geographical relationship to the stocks, the needs of developing coastal States and responsibility for historical depletion.

Excluding EEZ catches from regional allocation does not prevent biomass distribution, EEZ size and geographical relationship to the stocks from informing the equitable allocation of high-seas fishing opportunities.

Somalia remains committed to constructive negotiations. It cannot, however, support an approach under which past extraction becomes permanent entitlement, while the coastal States closest to the resources inherit the burden of rebuilding them.

Somalia kindly requests the Secretariat to circulate this communication to all CPCs and to submit it for consideration by TCAC17.

Yours sincerely,

H. E. ABDI DIRSHE



Director General
Somali Ministry of Fisheries and Blue Economy