



WWF Oceans Practice

IOTC-2020-S24-NGO

WWF POSITION for the 24th Session of the Indian Ocean Tuna Commission (IOTC)

Virtual, Microsoft Office Meeting

2-6 November 2020

WWF recognizes the unprecedented challenges presented by COVID-19 and the economic and social impact on the fishery sector in the Indian Ocean. Workers on ships are vulnerable to infectious disease and often lack access to health care – risks exacerbated by COVID-19. These wide-ranging impacts include failure to access markets and poor pricing in local or domestic markets from small-scale fisheries. In addition, stricter border and trade controls have led to reduced fishing opportunities for coastal countries whereas large-scale fishing continues. This growing situation may further marginalize and exacerbate the vulnerabilities of small-scale fishers.

There is a dire need to engage in meaningful dialogues and coordination among fisher communities and relevant governments, who must come together at the regional fisheries management organizations to reduce fishing pressure and safeguard rights of small-scale fishers in the Indian Ocean. To reach this goal, IOTC's Contracting Parties must adopt ambitious measures contributing to fair, resource-efficient and resilient development; stop overfishing in the Indian Ocean; and act immediately to adopt a robust rebuilding plan for recovery of the yellowfin tuna stock. They must exercise precautionary management aimed at long-term sustainability ensuring food security and a resilient ecosystem.

WWF's priority outcomes for the 24th Session of the Commission:

1.0 Adopt an overall catch reduction target of 30% for all gear types to rebuild the Indian Ocean yellowfin tuna stock

- 1.1*** Ensure Indian Ocean YFT population is showing signs of recovery from overfishing by 2022, by adopting an overall catch reduction target of 30% for all gear types
- 2.0*** Restrict skipjack catches to the total allowable catch (TAC) for 2018-2020 period at 470,000 tonnes
- 3.0*** Reduce the environmental impact of FADs through mandating the use of electronic tracking, non-entangling and biodegradable FADs

4.0 Commit to 100% observer [human or electronic] coverage on large-scale fishing vessels by 2025, with safeguards in place to ensure crew and observer safety

In this context, WWF urges all IOTC Contracting Parties to:

1.0 Adopt an overall catch reduction target of 30% for all gear types to rebuild the Indian Ocean yellowfin tuna stock

In 2019, Contracting Parties were unable to adopt a 25% reduction in overall catches of YFT as indicated by IOTC-SC projections for stock rebuilding. Moreover, non-compliance to Resolution 18/01 (superseded by Res 19/01) resulted in an overall 3% increase in the previous reporting period. In addition, fleets that were not subject to catch reduction increased their catches by 10%, because the exemptions contained in the rebuilding plan allowed growth in some sectors. WWF remains concerned that this inability to take meaningful action to reduce overall catch has repercussions on the long-term sustainability and food security in the Indian Ocean.

- 1.1 WWF urges Contracting Parties to adopt a comprehensive, robust and effective stock rebuilding plan for the Indian Ocean yellowfin tuna to achieve at least an overall 25-30% reduction of YFT catches;
- 1.2 This target should include reduced catch targets for all gears/fleets AND support removing any/ all exemptions. This catch reduction is essential to achieve spawning stock biomass above target reference points (Bmsy) by 2027 allowing more than 50% probability to ensure stocks recover.

2.0 Restrict skipjack catches to the total allowable catch (TAC) for the period of 2018-2020

WWF recognizes that the increased targeting of skipjack in the Indian Ocean poses serious threats to its stocks. While the harvest control rules (HCR) were adopted in 2016, and a TAC was set in following year, ever since, catches continue to increase and the IOTC Contracting Parties have failed to maintain these catches at 470,000 tonnes, which is the total allowable catch from 2018-2020. Skipjack catches have continued to increase over the past three years. In addition, the catch limit/threshold was overshot by 30% in the first year of maintaining the TAC (2018) to 607,000 tonnes.

- 2.1 Based on Resolution 16/02, IOTC Contracting Parties have not followed their own HCR. To prevent ongoing decline, mandatory precautionary measures must be implemented.
- 2.2 The skipjack HCR and its triggers should be made mandatory and be enforced, through penalty or other mechanisms, such as compliance or quota allocation.
- 2.3 Contracting Parties should also insist that the stock assessment process continues in 2020, with a reallocation of TAC and defining extraordinary circumstances.

3.0 Reduce the environmental impact of FADs through the use of electronic tracking, non-entangling and biodegradable FADs

WWF urges Contracting Parties to adopt science-based limits for the numbers of deployed FADs per vessel. To achieve this, the Contracting Parties should:

- 3.1 Request the Scientific Committee of the IOTC to urgently assess and determine the optimal number of FADs that the FAD-based Purse Seine industry can deploy, which will significantly reduce mortality of YFT and rebuild the stocks to MSY.

- 3.2 Adopt essential data requirements such that data is collected by number of set/total sets.
- 3.3 Deploy real-time electronically trackable FADs to ensure transparency, traceability and allow reporting of FAD position to the flag state and the commission from all vessels fishing in proximity of FADs (12nm).
- 3.4 Mandate that all FADs are identifiable in order to trace ownership in case of non-retrieval.

The Indian Ocean region lacks effective management of FADs in terms of effort and verification. It is critical for Contracting Parties to be able to implement the provisions of Resolution 19/02 as stated by 2021-2022. The Indian Ocean FAD-based PS fishery has the highest percentage bycatch, 25%, of all PS FAD-based fisheries, compared to a global average of 16%.¹ Contracting Parties are urged to recognize the importance of reducing the environmental impact of FADs through the use of non-entangling and biodegradable FADs, and by adopting and implementing the best management practices (e.g., ISSF). For this purpose, the ad-hoc working group on FADs should deliver on its promise on Resolution 19/02, and ensure that all/any FAD measures are complementary to stock rebuilding in case of depleting populations.

4.0 Require 100% scientific observer or electronic-based observer coverage on large-scale industrial vessels by 2025

Despite the requirement to do so, Contracting Parties have failed to achieve a fully functional scientific observer data collection and observer scheme for tuna fisheries for their flag vessels. Considering the fact that data acquisition and validity is a primary concern, it is essential that observers be deployed to gather quality data to ensure long-term sustainability of tuna stocks. In addition to ensuring that fishing takes place legally and sustainably, observers have an obligation to report illegal activities. The very nature of their responsibilities leaves them at risk for intimidation and abuse. WWF welcomes the international recognition of the dangerous nature of these crucial jobs at sea. Yet increasing instances of fisheries observer deaths, as well as violations of fishing crew welfare, have been reported to authorities and NGOs in recent years. WWF is disturbed by this trend and takes these reports very seriously.

- 4.1 The COVID-19 pandemic situation has raised concerns for human safety globally and in response to the alarming situation, some Contracting Parties have requested relaxed onboard human observer coverage. WWF recognizes the need and urgency for improved human safety on board fishing vessels, and urges Contracting Parties to adopt a rigorous observer safety scheme.
- 4.2 The COVID-19 pandemic poses a serious risk to human and crew health and safety.
- 4.3 Moreover, WWF is also concerned about observer health and safety and security and it is deemed essential that observer coverage is met through other means during these difficult times.
- 4.4 Regional management authorities and governments that register vessels must ensure that adequate measures are in place to ensure protection of observers and fisheries workers, and due process is implemented when incidents or allegations emerge.
- 4.5 WWF respectfully request that the IOTC takes immediate action to adopt the Conservation and Management Measure for Observer Safety and Security similar to WCPFC (CMM 2017-01 and,

¹ Is it good or bad to fish with FADs? What are the real impacts of the use of drifting FADs on pelagic marine ecosystems? Laurent Dagorn, Kim N. Holland, Victor Restrepo & Gala Moreno. FISH and FISHERIES, 2013, 14, 391–415

building on the Resolution 2018-01) and develop Labour Standards for Crew on Fishing Vessels, establish a formal and binding CMM on crew welfare.

- 4.6 WWF encourages Contracting Parties to focus on improving data collection, particularly in relation to the IOTC's regional observer scheme to advance the use of electronic monitoring and reporting systems.
- 4.7 WWF urges both IOTC and Contracting Parties to prioritize and expedite the process of developing minimum standards for electronic reporting to IOTC.
- 4.8 WWF encourages all Contracting Parties to implement the regional observer scheme with measures for observer safety and security and to report catches of tuna and tuna-like species from vessels engaged in the high seas as well as EEZs.
- 4.9 WWF encourages all Contracting Parties to undertake at least 20% minimum observer coverage for purse seine vessels larger than 24 m, including other gears by 2021, either human or electronic coverage.
- 4.10 It is proposed that the 100% scientific observer program be introduced over a five-year period and that all Contracting Parties with large-scale industrial vessels shall submit their observer program (human and/or electronic) implementation plan to the Commission at the next scientific meeting. WWF recommends all Contracting Parties ensure that onboard observer coverage is increased from a minimum of 5% to 10% for small-scale vessels (i.e. vessels under 20 m).

5.0 Require data collection for small-scale fisheries targeting tuna and tuna-like species

WWF urges the Contracting Parties to adopt a Scientific Committee verified alternate data collection scheme for small-scale tuna vessels. The Scientific Committee has noted the lack of data from small-scale fisheries that are currently unable to deploy human observers, and has requested the Working Party on Data Collection and Statistics to evaluate the validity of alternative data collection tools. Contracting Parties should explore opportunities to implement alternative data collection mechanisms – crew as observers (i.e. self-sampling), electronic monitoring (e.g. digital/handheld cameras), port sampling, and a combination of these – for the collection of the minimum standard data fields (Resolution 15/01, 15/02) for small-scale fisheries to improve the global management of sensitive tuna stocks.

6.0 Adopt an improved and transparent compliance mechanism by amending Appendix V of the IOTC Rules of Procedure (2014)

As stated in the 2016 Report of the 2nd IOTC Performance Review, *“The sense of accountability within IOTC seems to be very low; therefore, more accountability is required.”* Reinforcing compliance reporting by Contracting Parties as well as timely evaluation by the Compliance Committee is an urgent priority, as we see a failure to comply with many resolutions, such as Resolution 18/01, 15/01, 15/02, 16/02, among others. This lack of compliancy is considerably undermining effectiveness and thus the mandate of the IOTC to sustainably manage fish stocks.

In this regard, the annual meeting report of the Compliance Committee should include greater details on compliance status, recommendations to the Commission regarding any remedial actions taken or proposed to be taken by the concerned Contracting Party and priority obligations to be monitored and reviewed. In addition, the compliance analysis should be reported country-by-country as well as measure-

by-measure, rather than presented in a summarized format. This will allow the Compliance Committee to treat non-compliance issues in accordance with their seriousness and reflect the diversity of situations to provide specific support in enforcement if needed.

7.0 Adopt multi-species tropical tuna management measures where the impact of a fishery (all gears combined) cannot decrease co-dependent stocks to below MSY.

The international community has reiterated the urgent need to further integrate ecosystem approaches into fisheries conservation and management addressing bycatch, habitat destruction and overfishing². In IOTC, a tropical tuna CMM is essential to address the unsustainable race to fish where there is no mitigating impact on the other tropical tuna species. The impact of catches are exacerbated in tuna fisheries because the juvenile yellowfin tuna often school together with the same size, but mature skipjack tuna, and the species are thus caught together. In this context, WWF urges Contracting Parties to:

- 7.1 Adopt multi-species management reference points where the impact of a fishery (all gears combined) cannot decrease co-dependent stocks to below MSY.
- 7.2 Accelerate the process of an ecosystem-based harvest strategy approach for all tropical tuna with a drastic reduction of fishing effort, area closures, gear type provision, and evaluate the effects of spatial/seasonal closures.
- 7.3 Adopt a multi-species CMM to reduce juvenile mortality associated with tuna fishing and its ecological impacts. This will best be achieved by: 1) purse seine vessels must stop fishing using FADs in the IOTC area of competence for four months (120 days) between 0000 hours, 1 July and 0000 hours, 30 October each year; 2) all pelagic gillnets shall change from surface setting for pelagic fishing to subsurface fishing; 3) all large pelagic targeting gillnet fisheries shall be subject to a ban on the use of gillnets for at least two months starting from 0000 hours, 1 June and 0000 hours, 30 July of each year.

8.0 Adopt a new recommendation to improve traceability through an electronic catch documentation scheme

One of the most effective mechanisms for monitoring catches and preventing IUU fishing is the adoption of electronic catch documentation schemes (CDS). In 2019, the IOTC approved a decision to form a working group to guide the development of a CDS for IOTC (IOTC Circular 2019-50). Contracting Parties must:

- 8.1 Prioritize the continued development and subsequent adoption of an electronic CDS for all IOTC species and all size of vessels. A phased approach must be defined to initially prioritize large-scale vessels and overfished species as identified by the Scientific Committee.
- 8.2 Ensure a minimum level of compatibility of CDS standards with those of other RFMOs (CCSBT, ICCAT, and CCAMLR) to facilitate information sharing, better integration and monitoring of such systems worldwide.

² See last Resolution adopted by the General Assembly on 10 December 2019. 74/18. Sustainable fisheries, including through the 1995 Agreement for the Implementation of the Provisions of the United Nations Convention on the Law of the Sea of 10 December 1982 relating to the Conservation and Management of Straddling Fish Stocks and Highly Migratory Fish Stocks, and related instruments

9.0 Adopt a precautionary conservation and management measure for neritic/coastal tuna species, which adopts a multi-species management reference point

The Scientific Committee of the IOTC noted the serious issues on the data quality of neritic tunas and that 80% of the data is estimated for stock assessments. Furthermore, the Scientific Committee noted that the catches of most neritic species in the Indian Ocean have reached their highest reported levels, and neritic tunas currently account for around 40% of the total catches of IOTC species, which are the major sources of food and income for coastal communities of Contracting Parties.

WWF urges all Contracting Parties to renew their commitments to the conservation and management of neritic/coastal tuna species through the adoption of precautionary measures, which allows funding of a dedicated capacity building and data collection programme aimed at strengthening the stock status of the neritic tunas.

10.0 Improve conservation and management of endangered, threatened and protected (ETP) species

WWF is committed to the protection and conservation of sharks and rays, sea turtles, seabirds and marine mammals, and recognizes the urgent support for proposals to improve the protection and recovery of these key species. WWF supports the measures currently adopted by IOTC for sharks. However, the pace of management improvements is behind that required to address alarming declines in pelagic shark and ray populations globally, with, for example, the oceanic whitetip shark and scalloped hammerhead now critically endangered. Further actions to be addressed by the IOTC Contracting Parties at its 2020 round of meetings and into the future include:

10.1 For general bycatch mitigation rules

10.1.1 Adopt CMMs for bycatch mitigation, encourages Contracting Parties to reduce mortality at source and scale up successful pilots, such as the use of sub-surface gears in gillnet fisheries to reduce the mortality of sea turtles, cetaceans and sharks.

10.1.2 Improve data collection at species level via remote electronic monitoring and use of pattern recognition software to strengthen data quality for ETP species.

10.1.3 Adopt subsurface gear settings in gillnet/drift net fisheries (i.e. setting the nets 2 m below sea surface) to reduce bycatch of pelagic sharks, sea turtles and marine mammals. Contracting Parties fishing primarily with gillnets must transform their fisheries and ensure they are equipped to implement IOTC resolution 17/07 by 2022.

10.1.4 Develop eco-friendly and innovative fishing methods that help shift to selective fishing techniques and prevent and mitigate accidental catch and mortality of all ETP species (e.g. sharks, turtles, birds, and cetaceans), moving from a single species management approach to a multi-species approach.

10.2 For sharks and rays

10.2.1 Develop recovery plans for shark species in dire need of attention, such as scalloped hammerhead, oceanic whitetip and short-fin mako, which have progressively shown signs of decline in abundance and class-size. Given the perilous state of some of these sharks and rays, the IOTC Parties should proceed with developing recovery plans for the most threatened species even if IOTC has not yet been able to undertake

a stock assessment. The FAO Code of Conduct for Responsible Fisheries, and CBD Aichi Target 6 state that recovery plans should be put into place for depleted species.

10.2.2 Adopt a precautionary measure, as undertaken for mobula rays in the IOTC in 2019, considering there is enough evidence and reporting to the IOTC on the declining and poor stock status of sharks and rays, and table sharks up on the agenda.

10.2.3 Ensure all sharks caught in association with tuna fisheries are landed with fins attached.

10.2.4 Expedite the process of developing national plans of action for sharks and submit updated reports to the Commission while enhancing regional cooperation moving toward the development of regional plans of action for sharks.

10.2.5 Include in action plans capacity building programmes aimed at improving shark species identification, shark data sampling and reporting – including data mining, developing alternate tools to improve species identification (via genetic analysis, close-kin mark recapture, machine learning and artificial intelligence) when needed.

10.2.6 Continue the bycatch working group within the Kobe joint tRFMO process in order to develop and share approaches across tRFMOs to evaluate the implementation and effectiveness of bycatch CMMs.

10.3 For sea turtles

10.3.1 Improve data collection and reporting for sea turtles and implement the Scientific Committee advice on reporting sea turtles at the species level by making amendments to IOTC resolution 12/04.

10.4 For seabirds

10.4.1 Encourage Contracting Parties to amend the Resolution 12/06 on seabird conservation to include hook-shielding devices as a possible mitigation measure and require that all seabirds are identified to species level.

10.5 For cetaceans

WWF remains concerned about the state of marine mammals in the Indian Ocean, as inaction is resulting in ongoing declines in cetacean populations. Recognizing that preliminary estimates indicate that over 100,000 cetaceans may be caught in the Indian Ocean tuna fisheries each year, WWF urges Contracting Parties to:

10.5.1 Report sighting data from observer or equivalent data collection programmes to ensure that any interactions with cetaceans are reported to the IOTC.

10.5.2 Work with the International Whaling Commission Bycatch Mitigation Initiative to develop and implement bycatch prevention and mitigation options for small and large cetaceans that may interact with tuna vessels.

10.5.3 Amend Resolution 13/04 on the conservation of cetaceans to include longline, gillnets and other gear types, in addition to ensuring that artisanal/small-scale tuna fisheries causing cetacean bycatch within EEZs must report their interactions with dolphins, porpoises or other small cetaceans to the IOTC.

11.0 Ensuring human safety in tuna fisheries of the Indian Ocean

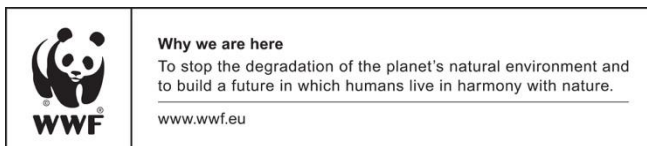
As acknowledged by the member states of the International Maritime Organization (IMO), the International Labour Organization (ILO), and the FAO during the 4th FAO/ILO/IMO Joint Working Group meeting on IUU fishing, vessels with substandard safety and working conditions for fishers and observers

are frequently linked to IUU fishing activities. Widespread implementation of relevant minimum international standards and full reporting of safety and labour-related incidents will allow for the identification and potential mitigation of dangerous situations and indirectly help to reduce IUU fishing activity. To date, IOTC has not taken appropriate action to ensure full and transparent reporting, and to catalogue operational incidents at sea for observers and crew members. In this context, WWF urges Contracting Parties to:

11.1 Propose and adopt a new resolution for Contracting Parties to ratify relevant conventions, such as the ILO 188, and take other measures to ensure safe and decent working and living conditions on board vessels.

11.2 Encourage Contracting Parties make every effort to ensure that their national legislation covers the mandatory information and use of safety of observers.

11.3 Adopt a new resolution/conservation and management measure on reporting on operational incidents at sea, or make amendments to Resolution 11/04 on Regional Observer Scheme to include observer safety at sea.



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