



ISSF POSITION STATEMENT

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Indian Ocean Tuna Commission
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The **International Seafood Sustainability Foundation (ISSF)** is a global partnership among the tuna industry, science and WWF, the global conservation organization. Our mission is to work toward the science-based conservation and management of tuna stocks and the protection of ocean health by supporting regional fisheries management organizations and advocating for the recommendations of each organization's scientific advisory body.

The first part of our statement addresses three of the most important issues facing global tuna sustainability: reference points and harvest control rules, fleet capacity, and the management of FADs. The second part addresses challenges specific to the IOTC.

GLOBAL ISSUES

Harvest Control Rules (HCRs) and Reference Points. HCRs are a set of well-defined management actions to be taken in response to changes in stock status with respect to target and limit reference points. Unless there is a pre-agreed upon action plan for avoiding overfishing or for rebuilding an overfished stock, long negotiations lead to delayed action or inaction. This delay can lead to further damage to the stock, requiring even more aggressive curtailing of fishing. The adoption of HCRs is a key aspect of modern fisheries management, and is also a requirement of several eco-label certification programs.

ISSF endorses the application of the Precautionary Approach using clear target and limit reference points and HCRs, as called for by the UN Fish Stocks Agreement and by some RFMO Conventions. While most tuna RFMOs have at least begun consideration of limit reference points through their science committees, none have fully implemented these measures. ISSF urges all tuna RFMOs to adopt stock-specific limit and target reference points and HCRs. This is one of the most important actions that RFMO members can take to ensure the long-term sustainability of tuna stocks.

With the IOTC's adoption of (non-binding) interim reference points in Recommendation 12/14, consideration should now begin of HCRs with an evaluation by the staff of expected performance under various HCR scenarios. ISSF supports the SC recommendation that the IOTC adopt these interim limits in a binding Resolution and proceed with the Management Strategy Evaluation process.

Closed Vessel Registries and Management of Fleet Capacity. Experts agree that there is overcapacity in the global tuna fleets. Fishing fleet overcapacity increases pressure to weaken management measures and eventually leads to stock overexploitation. The first step towards managing capacity is to establish limited entry via a comprehensive closed vessel registry with an eye towards ultimately reducing the number of fishing vessels to an appropriate level. The IATTC is the only tuna RFMO with a closed vessel registry, although current capacity is well in excess of resource productivity.

ISSF supports the Kobe III call for a freeze in purse seine fishing capacity by developed fishing nations and creating mechanisms to transfer capacity to developing countries with aspirations to participate in

these fisheries. These steps should be taken now, since scaling back fleet capacity will become even more difficult as new vessels are introduced. To this end, ISSF urges the following actions:

- ICCAT, IOTC and WCPFC adopt closed vessel registries, especially for purse seine fleets;
- All tuna RFMOs develop capacity transfer mechanisms to allow for increased participation by developing countries without an increase in overall capacity, while ensuring effective monitoring and control of the fisheries;
- All tuna RFMOs establish rules for monitoring and managing the movement of fishing capacity among the respective Convention Areas;
- All tuna RFMOs require unique vessel identifiers (such as IMO numbers), in order to strengthen their ability to monitor fishing capacity globally through the Consolidated List of Authorized Vessels (CLAV).

Fish Aggregating Device (FAD) Management. Setting on FADs accounts for nearly 40% of global tuna catches and 50% of global skipjack catches. The time is ripe for a concerted global effort to gather and report to RFMOs data on FADs (e.g., via logbooks) in order to better monitor FAD usage and to establish a sound basis for their management in every ocean region. With this information, scientists can advise decision-makers on how to reduce catches of small tunas and bycatch of non-target species that are commonly associated with FADs. Providing science bodies with detailed data on FADs and other floating objects can also greatly improve their stock assessments. However, with the exception of data collected through observer programs, there remains a need and opportunity to improve the information about this type of fishing at the RFMO level. In addition there is a growing understanding of best practices in FAD construction and bycatch mitigation – developments that ISSF is actively promoting – that could be implemented in the short term.

In order to adequately monitor FADs, there are two primary types of information that need to be collected and reported to RFMO scientific bodies: (i) an inventory and activity record of FADs ("FAD logbook": FAD markings, construction specifications, deployment, retrievals, etc.), and (ii) a record of encounters of fishing and supply vessels with the FADs ("fishing logbook": catch, by species, that results from sets made on FADs). These two types of information should be linked through the FAD ID or marking. Using this data, RFMO scientific bodies can and should advise on any necessary FAD management measures, followed by the development of effective mechanisms for implementation and compliance monitoring by fishery managers.

ISSF notes that the IOTC's existing FAD reporting requirements in Resolution 10-02 are ambiguous in their direction and insufficient to adequately describe FAD construction. Though additional data collection will be mandated as part of national FAD management plans, most CPCs have yet to implement them. ISSF urges the Commission to clarify the existing data requirements and expand them as necessary to ensure the reporting of the information listed above. In addition to improving FAD management, ISSF strongly endorses the SC recommendation (SC15.22) on the design and use of non-entangling FADs. This is a critical step in the reduction of shark mortality in the Indian Ocean.

IOTC CONSERVATION AND MANAGEMENT MEASURES

1. Tuna Stocks

The IO stocks of **bigeye, yellowfin and skipjack** are not overfished and are not experiencing overfishing, and therefore no immediate management measures are needed for these stocks. The IO **albacore** stock is being overfished (fishing mortality is 33% above MSY). Catches have increased substantially since 2007, particularly for longliners. If the current catch level (42,900 tonnes) is maintained, overfishing will continue and the biomass will fall below MSY. ISSF urges the IOTC to

adopt measures to eliminate the overfishing, such as reducing catches by at least 20% from the current level.

While other RFMOs have adopted tuna catch retention measures, to date the IOTC has not taken steps to require the same. The dumping of less valuable tuna in favor of higher value catch distorts our understanding of the actual impact on the tuna stocks by fishing operations. **ISSF urges the IOTC to adopt comprehensive catch retention measures for all purse seine-caught tuna.**

2. Sharks

The data on sharks in the Indian Ocean are extremely limited, preventing accurate assessments of the status of the region's sharks. However even with the limited data that is available, it is clear that the abundance of some species is declining. **ISSF strongly endorses the SC recommendations that the Commission A) develop mechanisms to encourage CPCs to comply with their data reporting requirement, and B) adopt measures to limit fishing mortality on sharks.**

ISSF urges the Commission to take further steps to enforce **the existing conservation and management measure addressing shark finning, and move to the total prohibition of the at-sea removal of shark fins and mandate that fins remain naturally attached for all sharks landed.** ISSF is also asking all RFMOs, including the IOTC, to **adopt a prohibition on deliberate purse seine setting around whale sharks.** ISSF was pleased to see the WCPFC adopt such a prohibition late last year, and looks forward to similar action by the IOTC.

3. Purse Seine Observer Coverage

Comprehensive observer coverage on purse seine vessels is a critical component of sustainable fisheries monitoring and management for tropical tunas. Other RFMOs have already implemented, or are moving towards, 100% coverage and the IOTC should do the same. **ISSF urges the IOTC to adopt 100% observer coverage on its tropical tuna purse seine fleet.** Where onboard observers are not possible, the Commission should explore the option of electronic monitoring systems and establish guidelines for their use.

4. Gillnet Fisheries

Gillnet fisheries continue to expand rapidly in the Indian Ocean, some of which use illegal large-scale pelagic driftnets. The SC noted that these fisheries have a substantial impact on marine ecosystems. Furthermore, they are inadequately sampled and monitored. **ISSF urges the IOTC to follow the SC advice to freeze catch and effort by gillnet fisheries until sufficient information has been gathered to assess their impact.**

5. Data Gaps

Developing the most effective and robust conservation and management of tuna stocks requires access to the most comprehensive information available on fishing activity - including capacity, fishing effort and catch. ISSF is concerned that the level of reporting by IOTC members is very uneven. **Significant improvements must be made, especially for the region's gillnet, artisanal and semi-industrial tuna fisheries. IOTC needs to diligently address these data gaps.**

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