EUROPECHE TUNA GROUP submits this statement to the DG MARE in support of acting on tuna conservation and management measure proposals to the 26th session of the Indian Ocean Tuna Commission that will take place in an hybrid format in Seychelles from May 16th to May 20th.

MANAGEMENT MEASURES PROPOSALS FOR TROPICAL TUNAS

Interim plan to rebuild the yellowfin tuna stock

ETG’s main priority is that CPCs that currently objected to CMM 21-01 on a management plan for yellowfin tuna reconsider their position. As main harvesters of yellowfin, their participation is a condition to the success of the management plan: while the EU purse seine fleet has reduces its catches by more than 22% compared to 2014, the whole catches in IOTC have increased by more than 6%. Therefore, ETG supports extending the validity of Resolution 21/01 for one more year and to create a sub-commission on yellowfin tuna in order to prepare a future revision of the plan, based on intersessional follow-up investigations and independent expert advice, as proposed by the European Union (Prop. A). In the meanwhile, ETG opposes any further reduction, that would impact only a part of the fishing vessels and gears.

The reduction proposed by Maldives (Prop. M) would seriously endanger the economic viability of the purse seine fishery and have implications on local economies depending on it. As a large part of the harvester CPCs already objected to the CMM, it is not equitable and it might not even allow to reach the target catch limit.

ETG also supports the possibility to replace supply vessels on the IOTC vessel register (Prop. J from Seychelles), without extending the current number of them, as they are essential to the functioning of long-distance fishing fleets.

Harvest control rule for skipjack tunas

IOTC should try to avoid on skipjack a similar situation than for yellowfin: an objection one or more of the main harvesters would make inefficient any management measure. ETG then advocates, in case a management plan is validated, to include a safety clause similar to the one proposed by the European Union (point 19 of Prop. B): its entry into force would be effective only provided that there in no objection from a CPC.

ETG also warns about any reduction that would heavily impact the purse seine fishery, already weakened by the yellowfin reductions.

Management procedure for bigeye tuna

ETG advocates to wait the scientific stock assessment results that will be available at the second semester of 2022 to take decisions on the management of bigeye tuna. It also call CPCs to work together in intersession to propose a widely accepted proposal at the 27th session of IOTC in 2023.

MANAGEMENT OF FADs

ETG relays its members will to achieve a sustainable and control management of all FADs: not only drifting but also anchored FADs. Regarding A-FADs, this objective is far from being achieved. Anchored FADs shall be submitted to the same obligations than D-FADs.
ETG approves progressive biodegradability, 2025 being a reasonable limit to develop better FADs models. It also approves the immediate notification of abandoned FADs and the attribution in the next years of IOTC numbers to the devices to the specific objective to collect information on how to mitigate FAD. Those numbers shall be confidential and known only by the IOTC Secretariat and the SC or a specialised WG, that could interpret them to identify drifting patterns.

However, data transmission should stay under the sole responsibility of the flag state, who then transmits it to the IOTC in a confidential manner, to ensure that scientists keep access to complete and viable data. ETG then opposes to the establishment of a register of FADs managed by the Commission and any non-confidential marking of FAD’s devices. It would not take into account situations like accidental freeing of the FAD from the buoy, ownership changes or appropriation and misused of FADs before its loss has been noticed. Necessary international jurisdiction on ownership and responsibilities shall be established by the competent bodies and the Commission shall focus on identifying drifting schemes to facilitate their recuperation.

For the same reason, ETG is not in favour neither of a DFAD monitoring system neither of the multiple and redundant declarations from the vessel to its flag authority and the IOTC while this information is already declared in logbooks and available to flag states authorities and scientists.

Already applied in other RFMO, FAD closures’ impacts on tuna stocks have not been scientifically assessed but their negative impact on purse seine fleets is evident. ETG then opposes to any FAD’s spatial closures, considering that they constitute an obstacle to the proper management of tuna quota as they do not allow the necessary flexibility to target of specific species, ages classes and volumes. Furthermore, de facto closures already exist in most of the coastal areas.

ETG also opposes the drastic reductions of instrumented buoys: there is no scientific base to such reduction and changing so often the limits prevents science from correctly assess the effects of FAD measure on a multiannual basis, in addition to constituting a threat to the economic viability of purse seine vessels.

**OBSERVATION COVERAGE**

ETG supports an increase of the observer coverage, at least up to 20% as recommended by the Scientific Committee, as well as a mixed system that would allow fleets to reach this coverage by allowing electronic observation to complement on-board observation. Adopting minimum standards for electronic monitoring is also a priority.

**MONITORING, CONTROL AND SURVEILLANCE**

ETG strongly supports the adoption of an inspection scheme, as proposed by EU but would require some clarifications on the following elements:

- **Point 25.k)** [Each contracting party shall require that Master of any vessel entitled to fly its flag] “refrain from resuming fishing activity until the inspectors have completed the inspection, and in case of serious infringements, until the evidence have been secured”: usually it is made clear in inspection schemes than when an inspector comes on board, the fishing activity continues as usual, and also terminates at some point so the inspector can witness the end of the operation and the sorting and storage of the fish inside the vessel. This is not totally clear with the current wording.

- **Point (33.f)** indicates that: “in the absence of any justifiable reason based on generally accepted international regulations, procedures and practices relating to safety at sea, refusal to accept a boarding and inspection by inspectors” constitutes a serious infringement. We totally agree with it and wonder if it would not be necessary to also precise in the proposal that the master can refuse a boarding an
inspection for security reasons, for the crew and/or the inspectors. Generally it refers to bad weather that would make the boarding dangerous, or any sea event or dangerous situation on board, that would be of course declared to the vessel's MRCC.

- Could you be more specific on the nature of the infringements that could, according to point 33.d) “taken together, constitute a serious disregard of the Agreements and CMMs”?

ETG is less positive on the Japanese proposal to modify CMM 21-02 on Establishing a Program for transhipment by Large-Scale Fishing Vessels.

The introduction of a “supply declaration”, submitted 24 hours in advance, not for a transhipment operation, but for any other service (sailor, machine reparation, diesel oil transfer…) provided to a vessel at sea in IOTC area – submitted 24H in advance appears like a disproportionate burden. ETG would propose that it applies only when providing supply to vessels which actually perform at-sea transhipments and then are part of the IOTC programme to monitor transhipments at sea and make an exception for the 24H in case of an urgent situations that implies the security of the ship or its crew. ETG would also recommend that this measure would be part of a CMM on inspection scheme, and not in the transhipment CMM.

While considering the would enhance the effectivity of traceability in the IOTC area, ETG would recommend that the other measures proposed by Japan to achieve a more efficient in-port inspection scheme should not be included in CMM 21-02, but be discussed as part of a control and inspection scheme

- Giving inspection priority to a vessel whose AIS track is not continued and enhancing surveillance of non-registered vessels transporting tuna and tuna like species
- Inscribing in the record of carrier vessels authorized to transport tuna and tuna like species as well as sharks, not only vessels that perform at-sea transhipments but any kind of transhipment,
- Imposing VMS to all carrier vessels performing transhipments
- Imposing separate stowage and stowage plans by species and origin vessel to all carrier vessels performing transhipments.