



## ISSF POSITION STATEMENT

Presented during the 16<sup>th</sup> Session of the  
Indian Ocean Tuna Commission  
in Fremantle, Australia  
22 – 26 April 2012

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.

ISSF would like to thank the Indian Ocean Tuna Commission for the opportunity to present this position statement supporting decisive action based on the expert advice and the research compiled by the IOTC Scientific Committee.

### STOCKS

**Bigeye.** The Indian Ocean bigeye stock is not overfished and is not experiencing overfishing. The SC recommended that catches not exceed 102,900 tonnes, the lower range of MSY estimates. The catch in 2010 (71,500 t) was substantially below MSY.

**Yellowfin.** The Indian Ocean yellowfin stock is not overfished and is not experiencing overfishing. While there was concern regarding the very high catches observed between 2003 and 2009, recent declines in fishing by purse seine and longline fleets have substantially lowered the pressure on the stock. The 2010 catch (299,000 tonnes) was in the lower range of the MSY estimates. The SC recommended that catches not exceed 300,000 tonnes.

**Skipjack.** The first Indian Ocean skipjack stock assessment was conducted in 2011 and it indicated that the stock is not overfished and is not experiencing overfishing. The SC recommended that catches not exceed 512,000 tonnes, the 2005-2009 average. The catch in 2010 (429,000 t) was substantially below this average. MSY is estimated to be about 564,000 tonnes.

**Albacore.** The IO albacore stock is experiencing overfishing and it may also be overfished. Piracy has resulted in a redistribution of longline fishing effort into traditional albacore fishing grounds, resulting in substantially increased catches. The 2010 catch (44,000 tonnes) substantially exceeded the MSY level of 30,000 tonnes. If the current level of fishing continues into the future, further declines in biomass and catch rates are expected.

### ACTION NEEDED

#### 1. Catch Limits

ISSF supports the IOTC Scientific Committee's recommendation that **catches of bigeye, yellowfin and skipjack not exceed 102,900, 300,000 and 512,000 tonnes, respectively.**

ISSF is concerned about continued overfishing of the albacore stock and recommends that IOTC **limit albacore catches to at or below the MSY level (30,000 tonnes or less).**

#### 2. Catch Allocation

Though ISSF supports the process established by the IOTC to formulate allocation criteria, we are concerned that a prolonged debate could result in a failure to adopt effective and timely conservation and management measures (as has occurred in other RFMOs). Given the recent stock assessments, tuna catches should not rise beyond current levels and albacore catches need to be reduced. Action should be taken now, since scaling back allocation quotas would be

made even more difficult once catch has increased. In the absence of an allocation agreement, at a minimum the IOTC must put a TAC in place.

### ***3. The Precautionary Approach, Reference Points and Harvest Control Rules***

Implementation of the precautionary approach, through the use of stock-specific reference points and harvest control rules, is fundamental to modern fisheries management. Without its adoption, IOTC fisheries will earn only low governance scores under most certification schemes, impeding potential economic development. At its December 2011 meeting, the SC endorsed the Secretariat's initiative for the implementation of the precautionary approach by IOTC. This includes the adoption of interim target and limit reference points, to be subsequently refined based on the results of the upcoming Management Strategy Evaluation. **ISSF strongly urges the IOTC to adopt the proposed precautionary approach initiative.**

### ***4. Vessel Registry and Capacity Limitation***

ISSF calls upon the IOTC and member nations to develop a record of tuna fishing vessels with unique identifiers<sup>1</sup> (e.g., IMO numbers), and to adopt a limited entry, closed vessel registry with an eye towards ultimately reducing the number of fishing vessels to a level that is commensurate with the productivity of the IO fisheries. To that end, ISSF also supports the Kobe III call for a freeze in fishing capacity by developed fishing nations and creating mechanisms to transfer capacity to those developing countries with aspirations.

### ***5. Transshipment***

Resolution 11-05 established a program to monitor at-sea transshipments by large-scale tuna longline vessels (LSTLVs) and requires other types of vessels to limit their transshipments to in-port only. ISSF is concerned that, if not properly monitored, at-sea transshipments can create a fertile environment for IUU fishing activities to go undetected. Resolution 11-05 does not define LSTLFVs explicitly, but "large scale" vessels in other Resolutions are defined as at least 24 m in overall length. **ISSF urges the IOTC to make explicit the definition of LSTLFVs to ensure that longline transshipments are properly monitored by the Resolution.**

To better monitor non-LSTLFV transshipment activity, ISSF also encourages the IOTC consider expanding their transshipment measure to include the reporting of in-port transshipment by all vessels, as well as a requirement for the submission of transshipment declarations from all purse seine vessels.<sup>2</sup>

### ***6. Sharks***

According to the SC, data on sharks in the Indian Ocean are extremely limited. **ISSF fully endorses the SC recommendation that the Commission develop mechanisms to encourage CPCs to comply with their reporting requirement on sharks.** Furthermore, given the concerns expressed by the SC regarding the risk to the stock status of several shark species at the current effort level, **ISSF urges the Commission to adopt measures to limit fishing mortality on sharks and to mandate that fins remain naturally attached for any sharks retained onboard.** ISSF is also asking all RFMOs, including the IOTC, to adopt a prohibition on deliberate purse seine setting around whale sharks.

### ***7. Data Collection & Monitoring***

ISSF firmly believes that the most effective and robust conservation and management of tuna stocks stems from 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 are needed, especially for the region's artisanal and semi-industrial tuna fisheries. IOTC needs to diligently address these data gaps.**

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<sup>1</sup> This includes participation in the global Consolidated List of Authorized Vessels (CLAV).

<sup>2</sup> McTee, S. 2011. Transshipment in Tuna RFMOs and mechanisms to support best practices in tuna fisheries. ISSF Technical Report 2011-09. International Seafood Sustainability Foundation, Washington, DC, USA.