THE PEW CHARITABLE TRUSTS

2005 Market Street, Suite 1700
Philadelphia, PA 19103-7077

901 E St., NW, 10th Floor
Washington, DC 20004-2008

www.pewenvironment.org

Square du Bastion 1A boîte 5
1050 Brussels, Belgium

Studio 10, Tiger House Burton Street
London WC1H 1BY, United Kingdom

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Dear Sir/Madam,

I am writing to you on behalf of The Pew Charitable Trusts in reference to the upcoming 18th Session of the Indian Ocean Tuna Commission (IOTC) in Colombo, Sri Lanka. Pew is an international non-governmental organization that works globally for the adoption of pragmatic, science-based policies that advance environmental conservation and sustainability.

At the 18th Session of the Commission, Pew calls on the IOTC to take the following critical actions:

1. **Adopt Conservation and Management Measures to Protect Sharks that:**
   a) Prohibit the retention of silky sharks (*Carcharhinus falciformis*)

   Silky sharks are commonly caught in all IOTC fisheries. Between 2008 and 2012 an average of 3,443 tons of silky shark were reported to the IOTC as landed annually, and the Scientific Committee has noted that maintaining or increasing effort will likely result in further declines in biomass, productivity, and CPUE.[i] At current effort levels, the stock status is at considerable risk. The Indian Ocean Tuna Commission Scientific Committee's report notes that "despite the lack of data, it is clear from the information that is available that silky shark abundance has declined significantly over recent decades."[ii] Of the ten most vulnerable shark species to purse seine and longline gear, silky sharks ranked second and fourth respectively, as determined by the IOTC ecological risk assessment (ERA).[iii] According to the IUCN Red List, silky sharks are Near Threatened in the western and eastern Indian Ocean, as well as globally. Given this particularly high level of catch, and the species' threatened status, **the Commission should follow WCPFC and ICCAT's example by prohibiting the retention of silky sharks in all fisheries in the Convention Area, requiring their immediate live release when caught.**

   b) Prohibit the retention of hammerhead sharks (*Sphyrnidae*)

   Hammerhead sharks are commonly caught as bycatch in longline and gillnet fisheries, and are targeted for their highly valued fins. Between 2008 and 2012 an average of 74 tons of scalloped hammerhead sharks were reported to the IOTC as landed annually, with the Scientific Committee noting the uncertainty of this figure due to the poor data provision on shark catches. The scalloped hammerhead is assessed by the IUCN Red List as Endangered in both the western Indian Ocean and globally. The FAO considers hammerheads to have an extremely low reproductive capacity and are one of the ocean's most vulnerable species. The Scientific Committee has noted that maintaining or increasing effort will likely result in further declines in biomass and productivity.[iv] The

scalloped hammerhead and look-alike species such as smooth and great hammerhead have been included in Appendix II of the Convention on the International Trade in Endangered Species of Wild Fauna and Flora (CITES), which will regulate their international trade. With the implementation deadline for this listing fast approaching in September, IOTC has an opportunity to help its member countries implement these measures. **Given the status and vulnerability of hammerhead sharks, and following ICCAT's example, a prohibition on the retention of all hammerhead sharks (*Sphyrna spp.*) in all fisheries in the Convention Area should be adopted at this year's IOTC meeting, while the collection and analysis of further data is prioritized through the Scientific Committee to determine levels of catch and trade that could be sustainable.**

c) Prohibit the retention of shortfin mako sharks (*Isurus oxyrinchus*)

Between 2008 and 2012 an average of 1,300 tons of shortfin mako sharks were reported to the IOTC as landed annually. According to the IUCN Red List, shortfin mako sharks are Vulnerable to extinction in the western and eastern Indian Ocean, as well as globally. The Ecological Risk Assessment developed for sharks in the Indian Ocean also identifies the shortfin mako as the most vulnerable shark to longline fisheries, and the third most vulnerable shark in purse seine fisheries. **As a result, the IOTC should adopt a measure that prohibits the retention of shortfin mako sharks in all fisheries in the Convention Area and require their immediate live release when caught.**

d) Require best practices for reducing shark bycatch

Unless scientific advice is developed and followed that guarantees that shark catch is sustainable, the catch of sharks should be minimized in all IOTC fisheries. To reduce catch rates of sharks by longline gear, the IOTC Scientific Committee recommends prohibiting the use of wire leaders. **This year the IOTC should ban the use of wire leaders and focus future scientific efforts on refining existing live release and safe handling guidelines for all shark species.**

2. Strengthen Controls Against Illegal, Unreported, and Unregulated (IUU) Fishing by Adopting Measures that:

a) Stop IUU-caught fish at ports

Pew welcomes continued efforts by the IOTC Secretariat and IOTC members to effectively implement Resolution 10/11 on port State measures, including the development of training and implementation materials, and the design of an IOTC web-based application on port State measures,[v] and looks forward to seeing the use of port controls by IOTC members operating at their full potential. **Pew urges IOTC members to accelerate their efforts to ratify the FAO Port State Measures Agreement, so that it can soon enter into force and achieve its intended global reach.**

b) Ensure full identification of fishing vessels

Pew welcomes the progress made at the last IOTC meeting requiring that all IMO numbered vessels be included in the appropriate vessel record. Pew also welcomes last year's amendments to Resolutions 13/02 and 13/07, which took useful steps towards

mandating IMO numbers for vessels larger than 24 meters. Since then, the international community has made significant progress toward mandating the use of IMO numbers as a basic identification number for fishing vessels: the Assembly of the International Maritime Organization extended the application of the voluntary IMO Ship Identification Number Scheme to fishing vessels,[vi] and CCAMLR, ICCAT, and WCPFC adopted measures requiring IMO numbers for larger vessels, and for all vessels in the case of CCAMLR.[vii] Building on the steps taken last year at IOTC, and taking into consideration developments in other international bodies, including two tuna RFMOs, **Pew calls upon IOTC members to introduce further amendments to Resolutions 13/02 and 13/07, which concern IOTC records of authorized vessels, to mandate that all vessels greater than 24 meters authorized to fish in the Convention Area obtain an IMO number and that this number be made public. In addition, mandatory reporting of the IMO number should also be introduced in Resolution 12/05 on establishing a program for transshipment. These requirements should enter into force at the earliest possible date and no later than 1 January 2016. Pew encourages all IOTC members to provide before the 18th meeting of the Commission the IMO numbers of all authorized vessels that already have them, as required by Resolutions 13/02 and 13/07 referenced above.**

c) Support the FISH-i regional partnership in the Western Indian Ocean

Pew welcomes the rapid and successful progress made by the FISH-i regional partnership, aimed at analysing integrated intelligence information and preparing for enforcement actions against IUU fishing operators in the Western Indian Ocean, since its establishment in December 2012. Pew looks forward to the growing commitment of its members and the support of the IOTC Secretariat.[viii]

d) Increase observer coverage

Due to the low level of current observer coverage, the quality of data from many IOTC fisheries is poor and introduces much uncertainty into management decisions. While we recognize that 100 percent observer coverage is currently unrealistic, IOTC should develop a plan to strategically increase overall coverage levels to scientifically recommended levels within five years.

e) Ban High Seas Transshipment

High seas transshipment continues to be used in the IOTC Convention Area as a way to avoid proper catch reporting and to launder IUU catch. The IOTC should introduce a ban on high seas transshipment until it can be ensured that transshipment operations cannot assist IUU fishing. This would require having a robust monitoring system in place that includes full transparency, requiring observers on board the offloading and receiving vessels and complete oversight by the Commission of all transshipment operations in the Convention Area.

3. Implement Catch Limits and Improve Gear Management for Tuna Species

a) Adopt science-based target and limit reference points

The IOTC Scientific Committee has noted that albacore is subject to overfishing, the stock

assessment of skipjack contains considerable uncertainty, and the annual catches of yellowfin should be lowered as a precautionary measure. In order to ensure the return to health fisheries, **the IOTC should adopt target and limit reference points that create a precautionary buffer between allowable catch and MSY for its primary fisheries.**

b) Improve Fish Aggregating Device (FAD) management

This year, the uncontrolled proliferation of drifting FADs must be addressed as a matter of priority. Currently, IOTC members fishing with FADs are required to submit management plans and information on FAD numbers (deployed, recovered, lost). **The IOTC should adopt additional requirements such as limits on the overall numbers of FADs, sharing of satellite tracking information with the Secretariat, and FAD collection policies** in order to address the ecosystem impacts and marine litter resulting from uncontrolled drifting FAD use.

Thank you very much for your consideration of these recommendations. Our delegation of specialists looks forward to meeting and working with all Parties next month in Sri Lanka to help ensure sustainable, legal fisheries and healthy populations of sharks and other species in the Indian Ocean and adjacent seas. If you have any questions or would like to discuss any of these issues further, please contact me at EWilson@pewtrusts.org or +1.202.263.9306.

Sincerely,

Elizabeth Wilson
Director, International Ocean Policy
The Pew Charitable Trusts

[i] IOTC-2012-SC15-R[E].
[ii] IOTC-2013-SC16-RE.pdf
[iii] Murua, H., *et al*., "Preliminary Ecological Risk Assessment (ERA) for Shark Species Caught in Fisheries Managed by the Indian Ocean Tuna Commission (IOTC)," December 2012, http://www.iotc.org/files/proceedings/2012/sc/IOTC-2012-SC15-INF10%20Rev_1.pdf.
[iv] IOTC-2013-SC16-RE.pdf
[v] See http://www.iotc.org/compliance/port-state-measures; and http://www.iotc.org/compliance/capacity-building-compliance
[vi] IMO Resolution A.1078(28), adopted 4 December 2013, IMO Doc. A28/Res. 1078, 15 January 2014.
[vii] CCAMLR CM 10-02 (2013), http://www.ccamlr.org/sites/drupal.ccamlr.org/files//10-02_5.pdf; ICCAT Rec. 13-13, http://www.iccat.int/Documents/Recs/6921-13_ENG.PDF; WCPFC, CMM 2013-10, http://www.wcpfc.int/system/files/CMM%202013-10%20CMM%20to%20revise%20CMM%202009-01%20WCPFC%20RFV.pdf.
[viii] FISH-i Africa is an initiative coordinated by the *Stop Illegal Fishing* working group of the NEPAD Planning and Coordination Agency with the support of the Pew Charitable Trusts. Currently, FISH-i Africa is a partnership between Comoros, Kenya, Mozambique, Seychelles and the United Republic of Tanzania, all of which are IOTC members. It connects partners on a real-time basis to share information and intelligence to enable them to make decisions and take action against suspected illegal operators. *Stop Illegal Fishing* and the Pew Charitable Trusts directly support the group with the technical assistance of the IOTC Secretariat and the Indian Ocean Commission's SmartFish Project.