

To: Dr.Christopher O'Brien
Executive Secretary of IOTC

14 Mar 2021
Date:
No : 40823
Encl:

Subject: Feedback regarding compliance issues from Iran

Dear Sir,

Respectfully, on the basis of the letter of Feedback (IOTC Reference: IOTC2020-173) from Ms. Susan Imende, chairperson of the Indian Ocean Tuna Commission 24th session of the IOTC, I would like to reply as follows:

-Has not implemented the requirement on marking on gears, as required by Resolution 15/04.

Regarding on marking on gears for vessels operating in IOTC competency, it is not possible to implement the gears marking scheme at the moment. However, if there is a successful experience by other countries in this regard, we have been informed so that the necessary planning can be done in this regard while examining its aspects.

-Has not fully implemented the IMO number requirement on eligible vessels, as required by Resolution 15/04.

The instruction on how to receive/assign IMO Number for fishing vessels has been prepared and notified to provincial fisheries offices. They will pass it to the owners to encourage them to register their vessels. According to the "National regulations for tuna fishing management ", all fishing vessels above GT 50 tons are expected to have IMO Number by next years.

-Has not decreased nominal catch of YFT, as required by Resolution 19/01.

In relation to yellow-fin tuna fisheries management program in Iran, we would like to inform you that; catch method modifications (from gillnet to longline) are planned and fishermen received particular training to begin operational stage. During last year some yellowfin tuna harvested through longline method in Iran, which is mostly performed by fishing boats and it is gradually extended to fishing vessels. Concerning offshore yellowfin gillnet capture raise in Iran, there are definition contrasts between commission's statistics and ours since we categorize active fishing vessels beyond 24 miles from coasts as "offshore vessels" but offshore fisheries defined as out of "EEZ" regions by IOTC; that causes incompliance and indicated increase in yellowfin catch by gillnet method.

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- Has not fully implemented the VMS implementation plan, as required by Resolution 15/03.

As we reported to IOTC Secretariat, Iran Fisheries Organization has started the implementation of VMS system. In addition to 5 purse seiner vessels which equipped with the VMS system in the past years, the number of 68 dhows are equipped with the VMS system in 2020 under the IOTC license. However, Iranian Fisheries Organization is planning to implementation of VMS in all vessels. For this purpose, it is holding meetings to coordinate with the Iranian Ports and Maritime Organization. Since the Iranian Ports and Maritime Organization operates under the commitments of IMO in accordance with its international obligations, therefore Iranian Fisheries Organization is adopting the action plan of the Iranian Ports and Maritime Organization.

-On the implementation of resolution 15/02:

Iran Fisheries Organization (IFO) submitted catch and efforts data for artisanal and industrial fisheries by gear type and species on 30 June 2020. But on geographical position of vessels we started and coordination with IOTC experts to provide information and will be implemented according to the resolution 15/02.

Regarding size frequency, in 2019, Iran has submitted a comprehensive size data report to IOTC secretariat on coastal species. It includes COM, LOT and KAW by gear, month and time-area. For the first time we identify and report size frequency for each coastal species in the breakdown of 24 fishing grounds (Geographical position). The data format is as IOTC data collection format for coastal fisheries. We updated the Persian Gulf and Oman Sea's marine Map to meet the IOTC standards. All Iran's fishing grounds have got the accurate coordinate.

Regarding the size frequency for surface fisheries, we had a full coverage in terms of 1 fish per metric tonnes, sampling coverage, and also reporting by all available fishing gears such as: gillnet, long line and purse seine fishery. For purse seine the data reported by: month, gear and grid. For gillnetters, the size-frequency is submitted by IOTC standard but not grid area.

- Has not reported FADs set by type to IOTC Standard, as required by Resolution 19/02.

The FADs management plan has been revised and presented to vessel owners. Meanwhile, during the last year, Iranian fishing fleet activities have been limited to Iran's EEZ, as reported on 30 June 2020, therefore no FADs has been used by fishing vessels.

-On the implementation of resolution 17/05:

All sharks that are caught through the Iran fishing activities are by-catch. According to historical catch, this estimates normally less than 3% of the total catch. According to National regulations for tuna fishing management and Iran Environmental Protection Organization regulations, fishing sharks are banned and the offenders introduced to courts. So all the related species which are listed by IUCN, CITES, IOTC, or any other relevant organization are banded by country.

-Has not provided the Report on progress of implementation of the FAO Guidelines and this Resolution as required by Resolution 12/04

Different species of marine turtles in Iran have no food consumption. Especially since marine turtles are valuable and favorite in terms of environmental aspects among the Iranian people and Fishermen, so most people and fishermen tend to preserve them. In this regard, the Iran fisheries organization has implemented some training courses and trained many fishermen about how they deal with endangered species entanglement especially sea turtles.

On the other hand the National regulations for tuna fishing management and Iran Environmental Protection Organization regulations have banned fishing of marine turtles.

-Has not provided the Transhipments in port report as required by Resolution 18/06.

Relevant rules on the prohibition of transhipments the tuna and tuna-like fish at sea are set out in the "National regulations for tuna fishing management". Besides, when unloading fish in the port, a report on fish landing is obtained. In addition, marine patrols by "Aquatics Conservation Unit", reports from other fishermen, and observer's reports (if any) are used to prevent transshipments at sea. Moreover, regarding the list of vessels allowed to perform transhipments at sea, no vessel has been licensed by the Iran Fisheries Organization to do so.

-On the implementation of resolution 11/04:

Iran fishing fleet unfortunately because of some problems due to lack of accommodations, we have not been able to install observers on board the vessels. Iran has focused for better implementation of observer scheme only in ports and port sampling to achieve the observer rate required by IOTC. So our data and information are collected by monitoring in fishing ports and landing centres. This activity is covering more than 10% of active vessels.

-Has not fully implemented the prohibition of intentionally setting purse seine net around a cetacean, as required by Resolution 13/04

Dietary consumption of Cetacean is illegal (Haram in terms of religious laws) in Iran. Therefore these species have no comestible value and are not caught by fishermen. If caught in the net, they are immediately returned to the sea. The National regulations for tuna fishing management and Iran Environmental Protection Organization has also considered crimes for fishing of these species.

-Has not clearly provided data on interactions with marine turtles, as required by Resolution 12/04.

Iran has legislation to protect whale sharks and there is no interaction with marine turtles reported by Iran fishing vessels in 2019

-Has not clearly provided data on interactions with Cetaceans as required by Resolution 13/04.

Iran has legislation to protect all the marine cetaceans. Based on received information through the port state controls in 2019, IFO has not received any report about Cetacean by Iran fishing vessels

-Has not clearly provided data on interactions with whale sharks, as required by Resolution 13/05.

Iran has legislation to protect whale sharks. IFO has never received any report about Whale sharks by Iranian fishing vessels.

-Has not provided information on actions taken domestically to monitor catches of Blue Shark, as required by Resolution 18/02.

Iran has focused for better implementation of observer scheme only in ports and port sampling to achieve the observer rate required by IOTC. So our data and information are collected by monitoring in fishing ports and landing centres. This activity is covering more than 10% of active vessels.

- On the implementation of resolution 18/05.

According national regulation of tuna fishing management has prohibited of billfish to retain on board, tranship, land, as required by Resolution 18/05.

Iran Fisheries Organization, as a responsible CPC, will continue every effort to fully comply with IOTC conservation and management measures.

Turly yours,

P.Mohebbi

Iran Commissioner to IOTC

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