



Position Statement by the South West Indian Ocean Tuna Forum (SWIOTUNA) to the 11th Session of the Indian Ocean Tuna Commission (IOTC) Technical Committee on Allocation Criteria (TCAC) Held on the 30th January to 2nd February 2023, in Mombasa, Kenya

Preamble: SWIOTUNA is an umbrella regional organization for the Civil Society Organizations (CSOs), local fisherfolk communities and other Non-State Actors (NSA) with local presence in the South West Indian Ocean (SWIO) region.

The South West Indian Ocean Tuna Platform (SWIOTUNA) commend the Government of the Republic of Kenya and the Indian Ocean Tuna Commission (IOTC) for convening the 11th Session of the Technical Committee on Allocation Criteria (11th TCAC) in Mombasa, Kenya. SWIOTUNA extends our gratitude to the IOTC for granting us the observer status to the 11th Session of the IOTC -TCAC.

We wish to emphasize the following key issues and associated recommendations based on the Chair's provisional agenda of the meeting and the Chair's revised draft proposal for an allocation regime. The purpose of the resolution as provided for in article 2, shall form the basis and manner for the Commission to determine and share allocations of fish stocks listed in Article 5 Annex 1 and caught in the IOTC Area of Competence, among CPCs[, and New Entrants where relevant,] in a fair, equitable and transparent manner.

Discussions to Action: Conclude and implement quota allocation criteria: SWIOTUNA recognize the efforts and the progress made by the Indian Ocean Commission (IOTC) Contracting Parties (CPs) and the Cooperating and non-Contracting Parties (CCPs) in discussing the quota allocation criteria for the tuna resources in the IOTC area of competency. We acknowledge that allocation of fishing rights in international fisheries management is a highly complex and often contentious issue that is not easily resolved. We are aware that the 14th Session of the Indian Ocean Tuna Commission (IOTC) held in Busan, South Korea in March 2010 expressed concern of the declining tuna stocks, in particular yellowfin tuna in the IOTC area of competence and established

the Technical Committee on Allocation Criteria (TCAC). The TCAC among others was to develop tuna allocation criteria and recommend to IOTC members the allocation quota system for yellowfin tuna and bigeye tunas. The allocation quota system was to come into effect on 1st January 2012.

We take cognizant that discussing the issue of catch quotas for the IOTC member countries has not been an easy task. Since the Busan meeting in 2010, a total of 10 Sessions for the TCAC have been held without much tangible outcomes. The 9th Session of the IOTC Technical Committee on Allocation Criteria was held virtually from 2 to 4 November 2021. SWIOTUNA is particularly concerned with the slow pace of concluding the discussions on allocation criteria and the implementation of the allocation quota regime for the tuna stocks in the IOTC area of competency, especially for the yellowfin and bigeye tunas.

SWIOTUNA is quite optimistic that the IOTC TCAC meeting being held from the 30th January 2023 – 2nd February 2023 will come up with robust and appropriate criteria for quota allocation and implement the quota system for tuna conservation as soon as possible. The 9th Session of the Technical Committee on Allocation Criteria and the 24th Session of the Scientific Committee held in December 2021 had recommended that the quota allocation criteria and regime should have been adopted by the IOTC members by December 2022.

Application of precautionary principle in the allocation of quotas: SWIOTUNA has taken note of the scope of species that are targeted for the quota allocation scheme, namely, yellowfin tuna, bigeye tuna, skipjack tuna, albacore tuna and swordfish. It is also envisaged that the Commission shall determine a priority order and a timeline to include the following stocks managed by the IOTC under this allocation regime: (a) Indo-Pacific Blue Marlin (b) Black Marlin (c) Striped marlin (d) Long tail tuna (e) Kawakawa (f) Frigate tuna (g) Bullet tuna (h) Narrow barred Spanish mackerel (i) Indo-Pacific king mackerel] (j) Indo-Pacific sailfish (Article 5).

The IOTC stock status dashboard (2022) indicates that most of these species stock status is uncertain nor haven't been assessed, subject to overfishing and or overfished. The principal tropical tuna species in the IOTC area are experiencing high fishing pressure. Average catch for Albacore tuna for the period 2016–2020 was 38,781t hence exceeded the MSY of 35,700t per year. The stock is therefore subject to overfishing. The 2019 stock assessment by IOTC indicated that bigeye tuna stock is subject to overfishing though the catch of 83,498 t in 2020 was slightly below the MSY of 87,000 t per year. The Skipjack tuna stock assessment report (2020) indicated that the stocks were healthy, the IOTC Scientific Committee expressed concern that the catch limits over the past years have been exceeded. The yellowfin tuna stock in the Indian Ocean is in the red. The 2021 stock assessment report indicated that yellowfin tuna catches in 2020 was 432,624t as opposed to the MSY of 349,000t. The report indicates that yellowfin tuna stock remains overfished and subject to overfishing.

The species earmarked for future quota allocation, most of them are overfished and subject to overfishing. For instance, Blue marlin, striped marlin longtail tuna, narrow-barred Spanish mackerel are overfished and subject to overfishing.

SWIOTUNA urges the IOTC member states to apply precautionary approach in the allocation of quotas to its members and the future entrants, considering the paucity of data on stocks and the

current estimated stock status. This will greatly help in preventing the stocks from overfishing and eventually collapsing.

Consideration for small-scale fishers: Some of SWIOTUNA members are small-scale fishers and traders. They derive their food and livelihood sources from fishing activities. They play an important role in contributing to the national economies of the respective IOTC members. There is an overlap of resources and harvesting of the same by the industrial offshore vessels. The species being targeted by the quota allocation regime, including neritic tunas form significant catches of small scale/artisanal fishers. The quota allocation regime should explicitly take into consideration the interests and aspirations of small-scale tuna and tuna-like species fishers by the respective CPCs. We acknowledge that over 600,000 Mt of Tunas in the IOTC area of competence come from neritic and coastal tunas. However, it is not clear how many of that is coming from artisanal and industrial fishers. SWIOTUNA calls on the respective CPCs to ensure that the local artisanal/small-scale fishers would get the right share of the national quotas.

Ecosystems concerns: SWIOTUNA commends the IOTC members for the good progress they have made towards the implementation of tuna conservation and management measures. However, we take note of the slow progress made towards achieving the compliance that will ensure that tuna stocks are managed and harvested at sustainable levels. Fish Aggregating Devices (FADs) are widely used in purse seine fishing in the IOTC area of competence. The use of FADs has been associated with catching juvenile fish, especially yellowfin tuna which is already in the red zone. Longline fishing has been associated with high incidences of catching non-target species, especially sharks. Sharks are top predators that help balance the ecosystem. SWIOTUNA urges IOTC members to ensure that the quota allocation regime has provision for integrating ecosystem considerations as one of the guiding principles (Article 3).

Strict monitoring plan for the quotas to avoid over-catching and depletions of stocks: The weight of evidence here is clear, tuna species, including neritic tunas and billfishes have been assessed to be overfished or are being overfished. Over the years IOTC has been developing and adopting decisions aimed at promoting sustainable development, conservation, and management of tuna resources within the IOTC area of competency. Unfortunately, compliance with a large proportion of these has been low. The tuna stocks continue to decline while the fishing effort is on the increase despite the resolutions to limit catches adopted by the IOTC.

SWIOTUNA recommends a robust fishery catch data collection system and timely analysis and reporting to detect overfishing and over-catching beyond the allocated quotas of the respective CPCs (Article 7). IOTC has expressed concern on the quality of the data that is normally submitted by the fishing fleets in the IOTC area of competence. Most of the data is estimated and lacks biological parameters such as length-frequency and growth parameters. If robust monitoring and reporting plans are not put in place, these stocks will decline in the business as usual scenario.