



LDAC ADVICE ON IOTC 2025 (EN)

29th Session of the Indian Ocean Tuna Commission (La Réunion, 13-17 April 2025)

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1. Rationale

IOTC is an important RFMO for the EU, including as a coastal CPC, in terms of economic activity for the EU fishing and processing operators. This RFMO is also important as sustainable food systems and supply to the EU market, as the utilization of tuna resources means a significant contribution to regional food security and regional economic activity and creates jobs and income for local communities and EU business.

The EU fleet contributes not only to the economy of its mainland and outermost territories, but also, through licensing agreements, to the economies of several coastal states in the Indian Ocean region, using ports, local services, supplies, facilities, and also supplying local plants with raw materials.

The LDAC would like to see the adoption of holistic measures covering all fleets and CPCs to ensure level playing field for the long-term sustainability of the tropical tuna, tuna-like and shark stocks.

The LDAC reiterate its attachment to promote a responsible and sustainable fishing activity in compliance with maritime, environmental, social, and sanitary rules, as well as the best standards and science-based decisions.

2. Overarching recommendations

In view of the above, the LDAC wishes that all future IOTC recommendations must be based on three prerequisites/elements:

i. Sustainability: The aim must be to ensure the optimum utilisation of tuna resources and the economies that depend on them while minimizing impacts on the ecosystem to ensure the long-term sustainability of both the target stocks and the ecosystem.

ii. Science and Precautionary Approach: Decisions adopted must be science-based. In the absence of sufficient data, a precautionary approach must be applied.



iii. Level playing field: Compliance and implementation of the IOTC rules by all CPCs and all gear types. To be effective, any stock conservation or management measures shall target all relevant fisheries and not only one part of it.

To meet the prerequisites above mentioned, the LDAC recommends to the EU to:

2.1. Advocate for IOTC to **carry out dedicated socio-economic evaluations and impact assessments of proposals for conservation and management measures for tropical tuna, tuna-like and commercial shark stocks**. Science-industry collaboration in data gathering is essential for improving knowledge of the key commercial stocks.

In its first meeting that took place in Thailand on October 25th, the IOTC Working Party on socioeconomics agreed on gathering socio-economic data and on developing socio-economic indicators. The LDAC then recommends that the European Commission considers including relevant socio-economic studies as examples to foster discussions, for example the IRD study on “Macroeconomic impact of an international fishery regulation on a small island country”¹ either at the next WP or at the Commission meeting.

2.2. **Ensure accurate reporting and improve the level of compliance with all requirements among all CPCs.** This could be done by addressing those developing coastal states with problems of capacity, mobilising funding to assist when necessary. When CPCs already benefit from the development funds from IOTC for several years and do not implement their reporting, IOTC should investigate on the reasons why the assistance did not work.

2.3. Encourage reforms in decision making processes and promote a consensus-based environment to minimize the number of objections and **ensure level playing field in terms of adoption and implementation of decisions made by all CPCs** to achieve a real recovery of tuna stocks.

The effectiveness of the decision-making procedure in RFMOs relies on limiting risks of blocking or opting-out behaviours, a transparent objection procedure and a timely dispute resolution process must be considered like in other RFMOs such as SPRFMO and ICCAT to some extent.

¹ Guilloteau and all, 2024:

[Macroeconomic impact of an international fishery regulation on a small island country | npj Ocean Sustainability \(nature.com\)](#)



3. Specific recommendations on tropical tuna fisheries

3.1. Yellowfin tuna (YFT)

3.1.1. The LDAC notes that the probability of the stock being in the green Kobe quadrant in 2023 is estimated to be 89% and that the yellowfin tuna stock is determined to be not-overfished and not-subject to overfishing.

3.1.2. The LDAC recommends aiming to change from a recovery to a management plan for yellowfin tuna, which shall be implemented by all CPCs, including, if necessary, through a safeguard clause against non-compliance.

3.1.3. The LDAC also notes that the Scientific Committee recommends setting an initial TAC in 2026 which does not exceed the median recent MSY estimate, which is within a range of 416 000 and 430 000 t (421 000 t.) and represents a 20% increase compared to the MSY in 2023 (349 000 t.).

3.1.4. The LDAC recommends that this improvement benefits CPCs which, like the European Union, have applied catch reductions for 8 years.

3.1.5. Finally, the LDAC recommends adopting a discard ban on yellowfin, skipjack and bigeye tuna.

3.2. Skipjack tuna (SKJ)

3.2.1. The LDAC notes that the skipjack tuna stock is determined to be not overfished and not subject to overfishing. The LDAC also notes that the Scientific Committee recommends ensuring that catches of skipjack tuna for the period 2024-2026 do not exceed 628 606 t. annually, as calculated by applying the HCR specified in resolution 21/03.

3.2.2. The LDAC also notes that resolution 24/07 on a management procedure for skipjack tuna indicates that *“the Commission will develop a mechanism to constrain catch to the MP derived TAC for skipjack tuna no later than 2026, if an allocation scheme has not yet been agreed and implemented by the Commission.”*

3.2.3. The LDAC then recommends that the Commission insists on adopting individual catch limits for skipjack that will ensure compliance with the HCR, as well as level playing field for the European fleet and do not prejudice European vessels compared to others CPC’s vessels, not only at the Commission meeting, but also during previous intersession meetings on skipjack.



4. Specific recommendations on sharks:

4.1. Fins naturally attached (FNA) policy for sharks:

- 4.1.1. The LDAC reiterates one more year its unconditional support to the EU to push for the adoption of a fins naturally attached measure for all sharks, reaching out to other CPCs to improve the level of support.
- 4.1.2. The LDAC reminds that the FNA policy is in force since 2013² for all EU longline fleets with a commitment from the EU to seek for application in all tuna RFMOs since then.
- 4.1.3. The LDAC recommends that the European Commission continues demonstrating leadership by resubmitting a proposal in 2025 and to coordinate the week ahead of IOTC annual meeting with other CPCs (including Japan and China) for a joint proposal.
- 4.1.4. If no agreement can be found the EU should insist on requesting all CPCs that oppose 'Fins Naturally Attached' to demonstrate with scientific evidence the efficiency of alternative systems, they claim to have in place.
- 4.1.5. The LDAC recommends that if a consensus is once again blocked by individual CPCs, the Commission should be prepared to collaborate with co-sponsors and other supporting CPCs to call for a vote.

4.2. Improving compliance with shark related reporting requirements

- 4.2.1. The LDAC notes that reporting requirements laid out in Resolutions 15/01 and 15/02 are poorly complied with, preventing strong stock evaluations and conservation and management measures being adopted for shark species identified as a priority by the IOTC.
- 4.2.2. The LDAC calls for a level playing field and no longer tolerate exceptions from shark CMMs including reporting requirements and retention bans for coastal and /or small scale fleets. Exceptions from retention bans should be strictly limited to subsistence fishing activities and condition to measures in place that prevent any part of such catch entering the international trade.

² Regulation (EU) No 605/2013 (so-called "Shark Finning Regulation")



4.3. Conservation and Management measures (CMM) for sharks

General considerations

- 4.3.1. The LDAC supports a longtime sustainable management for commercially targeted shark stocks agreed by IOTC as well as improved communication between IOTC and CITES to provide the basis for CPCs to issue scientifically viable Non-Detrimental Findings (NDF) certificates for international markets in line with CITES requirements. At IOTC convention area blue sharks, shortfin mako sharks and silky sharks' stocks are targeted for commercial purposes by several fleets, including small scale and should therefore be subject to robust management procedures including HCRs, target, limit and threshold reference points. The Commission should task the Scientific Committee and Technical Committee on Management Procedures with their development
- 4.3.2. The LDAC is aware that shark bycatch mortality at IOTC remains high while the SC has repeatedly identified the need to reduce fishing mortality specifically for shortfin mako, oceanic whitetip and silky shark.
- 4.3.3. In view of the above, and to ensure level playing field, the LDAC requests that existing by-catch avoidance mitigation measures must be consistently enforced by all fleets and that the Commission should consider initiating additional research to minimize and where possible eliminate incidental captures and to increase post-capture survival of incidentally caught sharks, prioritizing IUCN endangered and critically endangered sharks and including all gear types.

4.4. Blue Shark (BSH)

- 4.4.1. The EU should actively promote that blue sharks stay with a high probability in the green area of the Kobe diagram in future years through the proposal of CMMs (including the setting and allocation of a TAC) as stated in paragraph 8 of the IOTC Resolution 18/02.
- 4.4.2. In this context, the LDAC notes that in 2024 the Commission requested the SC to initiate the Management Strategy Evaluation process for blue shark in order to develop a Management Procedure for this species and therefore the Working Party on Methods (WPM) agreed to include the blue shark MSE in its program of work. LDAC welcomes this decision and recommends requesting at this year's Commission Meeting the allocation of adequate resources and priorities to initiate the MSE process as soon as possible.



4.5. Shortfin Mako shark (SMA, LMA, MAK)

- 4.5.1. The LDAC notes that in 2024 the IOTC SC assessed shortfin mako to be overfished and experiencing overfishing and recommended that future catches should not exceed 40% of current catches to have a lower than 50% probability of exceeding MSY-reference points in 10 years, i.e., to recover the stock to the green quadrant of the Kobe plot with at least 50% probability within 10 years.
- 4.5.2. The LDAC is in favour of following the SC advice to stop the decline of the stock and warrant its recovery as well as ensuring that reporting requirements are enforced by all fleets as indicated in 4.2.

In this respect:

- The fishing sector recommends an annual TAC of 1,217.2 t for the stock to recover the stock to the green quadrant with a 50% probability within 10 years (representing all fishing mortality including retention, dead discards and post-release mortality), noting that this TAC level should include and account for the SMA, MAK and MSK species codes as reported to IOTC.
- The NGO group within the LDAC notes that shortfin mako sharks received the highest vulnerability ranking in the semi-quantitative ecological risk assessment (ERA) for longline gear (No. 1) because of their low productivity and high susceptibility to longline gear (Murua et al. 2018).

The NGO group within the LDAC recommends allocating a precautionary TAC of 300 tonnes (including all types of mortality i.e. landings, dead discards and post release mortality) or less between catch nations to provide at least a probability of 60% for the stock to be in the green quadrant of the Kobe plot in 10 years' time.



5. Observer coverage, Monitoring, Control and Surveillance (MCS), and fight against illegal fishing and associated abuses:

5.1. Observer Coverage

- 5.1.1. The LDAC recommends a gradual increase on the observer coverage from the existing 5% up to 20% for all gears operated in IOTC (incl. longliners, gillnetters and purse seiners alike), with electronic observer/EMS as a complementary tool to the physical observers' coverage noting that the presence of human observers is still very important and should not be replaced³.
- 5.1.2. The LDAC reminds that the adoption of Resolution 24/04 on an observation scheme did not change the required level of implementation of 5%, which is the lowest in all RFMOs.
- 5.1.3. The LDAC reminds that the EU purse seine fisheries voluntarily apply 100% observer coverage.
- 5.1.4. The LDAC reminds that longliners and gillnetters have to deal with technical and operational issues related to their limited space.
- 5.1.5. The LDAC notes that Electronic Monitoring Systems (EMS) might be particularly useful for longline vessels, given their average size (24 m. LOA) and limited space so they can be more efficient in terms of crews.
- 5.1.6. The LDAC aspiration is to move progressively increasing observer coverage also for longliners through human, electronic systems, or a combination of both, in compliance with the adopted IOTC standard for EMS.

5.2. Monitoring, Control and Surveillance (MCS)

- 5.2.1. The LDAC recommends striving for the introduction and mandatory use of a regional VMS applied to all fleets operating in the area to strengthen monitoring, control and surveillance of tuna and tuna-like fisheries of the Indian Ocean.
- 5.2.2. The LDAC supports the EU in updating its proposal on high seas boarding inspection scheme as last year, being aware of the potential blocking from China. It is essential to defend the principle that this scheme falls within the scope of IOTC agreement/convention.

³ IOTC Resolution 23/08 defines the EMS standards in which the requirements to meet partially or fully the minimum ROS are detailed.



5.3. Fight against Illegal, Unreported and Unregulated (IUU) fishing

- 5.3.1. The LDAC fully supports the introduction of an electronic and fishery-based catch documentation scheme (CDS) and regrets the lack of tangible progress. The LDAC urges the Commission to strongly advocate for the adoption of the relevant CDS resolution as per the proposed timeline in the endorsed IOTC CDS Strategy (v4).
- 5.3.2. The LDAC recommends a phased approach starting first with the three tropical species (bigeye, skipjack and yellowfin tunas) and swordfish and for the IOTC CDS to eventually apply to all IOTC-managed species. The IOTC scheme should follow the best practices of already established RFMO CDS and the EU catch certificate, including in terms of data fields and roles and responsibilities (a vessel representative or exporter creates and completes relevant sections of the documentation, and a government official validates) as to facilitate implementation.
- 5.3.3. The LDAC emphasizes the importance of accurate and reliable vessel data, including information on ultimate beneficial ownership to combat IUU fishing within the IOTC Convention Area.

Despite the requirements of Resolution 19/04, compliance remains inconsistent, with many CPCs submitting incomplete, inaccurate or no data at all. To address this, the LDAC recommends strengthening oversight through the Compliance Committee and WPICMM, seeking explanations from non-compliant CPCs and promoting a regional definition of beneficial ownership aligned with international standards. Additionally, capacity-building initiatives should be prioritized to improve data collection and reporting processes.

- 5.3.4. The LDAC supports a constructive multilateral approach for achieving consensus on a High Seas and Boarding Inspection system for the IOTC that takes into account the regional and individual characteristics, and the socio-economic realities for stakeholders participating in such systems.
- 5.3.5. The LDAC acknowledges that those systems must be conscious of the needs of Contracting Parties and Cooperating Non-Contracting Parties. To address this, the LDAC recommends exploring the option of voluntary measures that come attached with concrete conditions to strengthen monitoring, control and surveillance in the Agreement Area, these conditions should include, or may be limited, to the following:



- a) detailed reporting of all vessels refusing inspections which should include an explanation for the refusal and an immediate notification to the authorities of the fishing vessel, as well as the IOTC;
- b) the measure(s) are reviewed on a multiannual basis, with mandatory measure(s) phased in at an agreed timeframe following a transitional period. The LDAC also recommends the publication on IOTC's website of summary statistics and information on the implementation of the measure(s).

6. Transshipments

- 6.1.** The LDAC supports the total elimination of transshipments at sea and welcomes all proposals that will go along this line including any proposal that improves transshipment oversight, in the interim.
- 6.2.** The LDAC regrets that Resolution 24/05 on establishing a programme for transshipment by large-scale fishing vessels has increased the number of vessels benefiting from derogations to the obligation to monitor transshipments at sea via the regional observer program, instead of better regulating it.
- 6.3.** The LDAC is concerned about this growing number of carrier vessels operating under a derogatory regime for at-sea transshipments. Therefore, the LDAC recommends that the EU opposes any efforts to further expand this number and instead advocates for ending the currently existing derogatory regime for transshipments at sea.

7. Scientific research:

- 7.1.** The LDAC encourages the EU to provide adequate and sufficient funding to sponsor scientific work; and to dedicate the necessary human resources for EU scientists to participate in all IOTC relevant subsidiary bodies.
- 7.2.** This work is particularly important in ensuring presence of scientific advisors under the EU delegation and present at the Scientific Committee and relevant subsidiary bodies and Working Groups.
- 7.3.** Particular efforts should be dedicated in developing multiannual management plans (MPs) based on the results of the ongoing management strategy evaluation (MSE) work.



These multiannual MPs should cover all commercially fished stocks, ideally with a multispecies approach for tropical tunas and sharks.

- 7.4. The LDAC encourages IOTC to develop a quality control process of the data, programs and measures used by the Scientific Committee, to ensure that no unchecked unverified data is submitted.

8. Incidental catches and interactions with cetaceans

- 8.1. The LDAC reiterates its request for the EU to ask the Commission to fully enforce the ban on the use of driftnets. The LDAC also recommends further studies to reduce shark bycatch on longline and gillnet fisheries.
- 8.2. The LDAC notes that the WPEB suggested that studies are carried out to validate the findings of studies (e.g. Senko et al., 2022; Allman et al., 2020)⁴ that suggest that there are benefits to installing green LED lights on gillnets to mitigate bycatch in these fisheries in the IOTC, adding this activity to the Program of Work for WPEB. The LDAC recommends that the EU push for this suggestion to the Commission to add it to the Programme of Work by the Scientific Committee.
- 8.3. In line with IOTC Resolution 23/06 on the conservation of cetaceans, the LDAC recommends reviewing all available information on the status of cetaceans in the IOTC area of competence, and, on that basis, adopt and enforce measures that effectively protect aquatic mammals from negative effects of the interactions with IOTC fisheries.
- 8.4. The LDAC recommends that the Scientific Committee specifically considers interactions between cetaceans and gillnetters and recommends measures to the Commission. This gear is one of the main contributors of such interactions, and also one of the less documented.
- 8.5. The LDAC reminds that integrating data on baits used in tropical tuna longline fisheries is essential from an ecosystem-based management perspective, as discussed at the 27th meeting of the IOTC.
- 8.6. The LDAC recommends including reporting requirements for baits in IOTC.

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⁴ WPEB report: https://iotc.org/sites/default/files/documents/2025/01/IOTC-2024-WPEB20AS-R_E_rev1.pdf