



## WWF POSITION for the 27th Session of the Indian Ocean Tuna Commission

IOTC-2023-S27-NGO

Mauritius

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### Introduction

**The Indian Ocean is considered the second-most productive ocean, supporting the second-largest tuna fishery in the world.** Unlike in other oceans, **Indian Ocean artisanal fisheries contribute (56%)** a greater proportion of the total tuna catch than the industrial fishery (44%). **Around 93% of the neritic and 37% of tropical tuna** (yellowfin, skipjack and bigeye) catch is from artisanal fisheries which supports livelihoods, economies and food security of coastal states and small-island developing states, mostly notably in Indonesia, Oman, Sri Lanka, India, Iran, Maldives and Yemen (in order of contribution). **In addition, 70% of the IOTC membership consists of developing coastal states**, bringing diverse representation and varied objectives to tuna fisheries management which include food security, local trade, export and import, fisheries processing, access to Indian Ocean waters by foreign vessels, and employment in the fisheries processing and wild-capture fishing sectors, all of which ultimately depend on tuna populations being healthy, resilient, and sustainably managed in accordance with science-based targets.

**According to the IOTC database (<https://data.iotc.org/browser/NC/SCI/>) tropical tuna comprises 61% of the region's total catch which are sold as high-value sashimi (fresh and frozen), tuna steaks or as canned products, which are destined for lucrative markets such as the EU, Japan, Korea, the UK and the USA.** Despite this importance, a crisis/emergency in the Indian Ocean is unfolding: all four commercial tuna species (yellowfin, bigeye, skipjack and albacore) are being fished above their threshold levels (high fishing mortality). As a result, yellowfin and bigeye tuna are overfished and overfishing continues, while skipjack and albacore are fished above the maximum sustainable yield (MSY) limits agreed by the IOTC. This situation is putting the future of Indian Ocean tuna fisheries in jeopardy.

### Recent Developments

**WWF welcomes the recent adoption of the drifting FAD and anchored FAD measures at the IOTC's 6th special session that took place from 3-5 February 2023 in Mombasa, Kenya.** In the past, the Indian Ocean region lacked effective management of FADs. WWF urges all **Contracting Parties (Members) and Cooperating Non-Contracting Parties (collectively referred to as CPCs)** to continue to move forward and strengthen conservation and management measures for FADs with the aim of reducing the negative ecological impact on habitats and high fishing mortality of juvenile tuna.

**WWF is deeply concerned about the 'use of objections' and the failure of CPCs to respond to long-term sustainability calls by several stakeholders (NGOs, markets and retailers) to end overfishing.** These stakeholders are also asking IOTC CPCs to improve data acquisition and sustain tuna fisheries to improve food security, livelihoods and income generation for coastal states while simultaneously implementing their own

Resolution 12/01<sup>1</sup> and international commitments, such as the SDGs Agenda 2030. WWF urges **all CPCs, as a matter of urgency, to be compliant to IOTC resolutions and adopt the amendments in appendix V of the IOTC rules of procedure for an improved and transparent compliance mechanism allowing for accountability.**

In addition, recognising the declining state of tuna stocks in the Indian Ocean, CPCs must adopt the following priorities at the 27<sup>th</sup> session of the Commission in May 2023:

- 1. As a matter of urgency, all CPCs must commit to be compliant to IOTC resolutions and adopt the amendments in appendix V of the IOTC rules of procedure for an improved and transparent compliance mechanism allowing for accountability.**
- 2. Adopt a multi-annual (at least three years) rebuilding plan for the stock of Indian Ocean yellowfin tuna in the IOTC area of competence, aiming to achieve an overall 30% reduction from 2020 levels to end overfishing by 2030.**
- 3. Reduce the environmental impact of FADs through the mandatory use of electronically tracked, non-entangling and biodegradable FADs.**
- 4. Reduce the environmental impact, including juvenile mortality, of yellowfin tuna from industrial fishing, and implement a dFAD area closure by 2024.**
- 5. Adapt a management procedure for tropical tuna species that address deficiencies to strengthen harvest strategies and move towards a multi-species tropical tuna management measure by 2025.**
- 6. Regulate and improve data reporting on driftnet fisheries (less than or equal to 2.5 km) in the Indian Ocean, allowing for a transition (phase out) and/or conversion to fishing gear that reduce impacts on ecosystems and marine megafauna with immediate effect.**
- 7. Ensure human and labour rights and safety for crew, and adopt measures to guarantee the safety and security of human observers on large-scale tuna industrial vessels by 2024.**
- 8. Strengthen the scientific research on bycatch mitigation and improve the conservation and management of endangered, threatened and protected (ETP) species while applying the precautionary approach by 2025.**

#### Detailed WWF Position

**WWF Recommends that “a new compliance mechanism by amending appendix V of the IOTC rules of procedure for an improved and transparent compliance mechanism allowing for accountability”.**

Conservation and management measures adopted can only be as good as their implementation. As stated in the 2016 Report of the 2nd IOTC Performance Review, *“the sense of accountability within IOTC seems to be very low; therefore more accountability is required”*. Reinforcing compliance reporting by CPCs as well as developing a better structured and integrated approach to evaluating their compliance in the annual meeting report of the Compliance Committee (CoC) must be an urgent priority. This will allow the CoC to treat non-compliance issues in accordance with their seriousness and reflect the diversity of situations to provide specific support, including financial support, to enforcement if needed.

In this regard, the annual meeting report of the CoC should include greater detail within the recommendations to the Commission regarding any remedial action taken or proposed to be taken by the concerned CPC; priority obligations to be monitored and reviewed and any other relevant action suggested.

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<sup>1</sup> On the implementation of the precautionary approach for management of tuna stocks. IOTC CPCs have committed to international instruments (UNFSA, UNCLOS, among others) and have a shared responsibility to manage highly migratory species and shared stocks responsibly.

In addition, if any CPC requests additional time for submitting further information to the CoC, its compliance status should reflect the information available at the time, noting that more information will be forthcoming from the CPC. The compliance analysis should be reported country-by-country as well as measure-by-measure, rather than presented in a summarised format. Similar mechanisms and reporting practices have already been implemented in other RFMOs such as the Convention for the Conservation of Antarctic Marine Living Resources (CCAMLR) and the General Fisheries Commission for the Mediterranean (GFCM).

Following the above compliance exercise, the CoC should evaluate the response of concerned CPCs to any incidences of non-compliance, along with any new information, and propose to the Commission to review the compliance status of any relevant CPC as needed. In these cases, the Commission shall recommend appropriate measures aimed at resolving situations of persistent non-compliance which could include non-discriminatory trade measures.

**WWF Recommends “Adoption of a multi-year (at least three years) rebuilding plan for the Indian Ocean yellowfin tuna stock in the IOTC area of competence, aiming to achieve an overall 30% reduction from 2020 levels to end overfishing by 2030”.**

Indian Ocean yellowfin tuna has been overfished since 2014. The first rebuilding plan was adopted in 2016 and has since remained ineffective due to non-compliance and increased catches reported from exempted countries. From 2016-2020 average catches (434,383 mt) were determined to be above the estimated MSY level (403,000 mt). In 2021, an interim measure on Indian Ocean yellowfin tuna was adopted, which now supersedes previous plans (19/01, 18/01, 17/01, and 16/01). The Resolution 21/01 provides a robust framework on catch reductions and proposes an overall total allowable catch for each CPC, however as of 01/01/2022, this measure was weakened with formal objections submitted by six CPCs (India, Indonesia, Somalia, Oman, Iran, and Madagascar). While some CPCs have managed to achieve the reduction targets, those reductions were unfortunately offset by increases in catches by CPCs exempted from catch reduction or limits for yellowfin tuna.

No stock assessment was conducted in 2022, so the management advice is based on the assessment undertaken in 2021, which estimated spawning biomass of yellowfin tuna in 2020 to be 87% of the level that supports the MSY ( $SB_{2020}/SB_{MSY} = 0.87$ ). Current fishing mortality is estimated to be 32% higher than that of FMSY ( $F_{2020}/F_{MSY} = 1.32$ ). This means that Target Reference Point (TRP) and Limit Reference Points (LRPs) have been breached and overfishing continues to occur.

According to the information available in 2021, the total catch has remained above the estimated MSY since 2012 (i.e. between 399,000 t and 448,642 t), with the 2019 catch (448,642 t) being the largest since 2010. The IOTC scientific committee MSY estimate for the Indian Ocean yellowfin tuna stock is 349,000 t with a range between 286,000 - 412,000 (lower - high). Moreover, the IOTC Scientific Committee also indicated that the 2017-2021 average catches (435,225 t) were above the estimated MSY level and although the overall catch in 2021 may have been reduced by 3% as compared to 2020 levels, the catch remains to be substantially higher further indicating that the rebuilding plan needs to be effective.

WWF is concerned by the level of management on yellowfin tuna in the Indian Ocean, and believes that a long-term rebuilding plan must be adopted at its 27 session of the Commission, rather than negotiating a new or amended version every year. This is especially important considering the time it takes for several CPCs to implement and translate the adopted resolutions in national legislation. For this purpose, WWF recommends the following:

- CPCs must reduce the overall catches of yellowfin tuna by 30% from 2020 levels (430,956 t) to ensure that catch limit is set at ~302,000 t to allow to rebuild the stocks by 2030;

- CPCs must agree to adopt a multi-annual, at least a three-year, rebuilding plan which is updated with the new stock assessment every three years;
- WWF urges all CPCs to set the reduction targets on the basis of fairness, equity and transparency to avoid disproportionate sharing of the burden of over-catch from 2016-2021;
- All CPCs must ensure that over-catch scenarios are duly taken into account based on interim measures agreed in 2021, 2019 and 2018;
- All CPCs must adhere and abide by the catch reduction targets set forth in CMMs adopted and applicable to them.

WWF believes that agreeing and adopting an overall 30% catch reduction for yellowfin tuna in the Indian Ocean, would allow for a 67% (~70%) probability of  $SSB > SSB_{msy}$  by 2030, furthermore, with 30% catch reduction, there is a 69% probability of  $F < F_{msy}$  by 2030, and 70% probability of  $F < F_{msy}$  by 2023. The target reference points should be managed and maintained at or above the TRP with a probability of greater than 50%. In addition to the above recommendations, WWF believes there are several parts of the rebuilding plan that need to be taken into consideration including the following:

- WWF calls for 100% scientific observer programs to be adopted for large-scale industrial vessels (electronic/and or human) to improve the data on yellowfin tuna and complement the rebuilding plan.
- WWF recommends that the Scientific Committee is able to hold ad-hoc FAD working group meetings and preparatory meetings ahead of its 26th session to allow to evaluate dFAD data to make informed decisions based on science providing advice on dFAD closures
- WWF encourages the CPCs to expedite the adoption of alternate data collection mechanisms for small-scale fisheries/artisanal vessels targeting tuna within their Economic Exclusive Zones (EEZs) to improve data collection and reporting to IOTC on yellowfin tuna.
- Ensure large-scale driftnets are regulated in the IOTC area of competence (i.e. reduced to no longer than 2.5 km in length) and conservation and management measures (CMMs) are adopted to reduce their footprint on tropical tunas and ETPs.
- Adopt comprehensive harvest strategies by expediting the process on management procedures to set biological target reference points for stock management for tuna and tuna like species (from  $MSY$  to  $SSB$ ).

WWF reiterates that the road to recovery for Indian Ocean yellowfin tuna will require dramatic reductions over a period of two generations (10 years). If no action is taken, these reduction targets will dramatically increase year after year. WWF strongly encourages all CPCs to work collaboratively and be willing to make compromises for the long-term sustainability of the stocks, securing livelihoods and ensuring food security for millions of people in the Indian Ocean.

**Reduce the environmental impact of FADs through the mandatory use of electronically tracked, non-entangling and biodegradable FADs, reduce environmental impact, including juvenile mortality of yellowfin tuna, from industrial fishing, and a dFAD area closure.**

In the past, the Indian Ocean region has lacked effective management of FAD. The FAD measures included in Resolution 19/02 are weak and do not provide conclusive management measures for having data being made available for scientific purposes, fine-scale resolution of data on a set by set basis, a lower number of limit to reduce effort, among others such as transparency and traceability of dFAD operations. WWF has remained concerned about the use of dFADs and its negative ecological impact on habitats and high fishing mortality of juvenile yellowfin tuna. The Indian Ocean FAD-associated purse seine fishery has a 25% of juvenile yellowfin tuna catch as compared to the global average of 16% of all other purse seine FAD-based fisheries. In the Indian Ocean, the purse seine fishery contributes to 52% of the yellowfin tuna and 77% of the bigeye tuna juveniles caught in the Indian Ocean from 2014 – 2021 on average. Given the likely spawner biomass independence of

yellowfin tuna, the capture of juveniles has an exponential impact on the state of the stock. In 2023, WWF welcomed the adoption of the dFAD and aFAD measures at the IOTC's 6th special session that took place from 3-5 February in Mombasa, Kenya. However, as of 06/03/2023 three countries (Comoros, Sultanate of Oman, and Kenya) have submitted formal objections to the adopted measure. There is an urgent need for implementing the adopted measures and urge all CPCs to comply with the measures to ensure that the ecological impacts of a fishery and its negative effect on associated tuna stocks are reduced.

WWF recommends the CPCs ensure that all FAD measures adopted are complementary to stock rebuilding of yellowfin tuna and must ensure the following:

- Reduce the use of drifting FADs, using scientific approach and agreeing to adopt an optimum number of dFADs and/or limiting to 100 operational FADs per fishing vessel at any given time if the stocks are not able to recover/show signs of recovery;
- CPCs must monitor the impacts on other tuna, and evaluate implications on stock health (i.e. how SSB is impacted by high fishing mortality on juvenile yellowfin tuna) due to excessive use of FADs that could lead to further overfishing of yellowfin tuna;
- CPCs shall ensure full transparency of dFAD operations, including submission of all data transmitted by operational buoys to an independent third party in near real-time, including verification and ownership, numbers, position from deployment until retrieval, species composition recorded by its size and weight, and reporting by set data;
- To minimise their impacts on ETP species and broader ghost fishing impacts, no netting should be permitted in dFAD designs and all the materials used in the construction of dFADs should be fully biodegradable by the end of 2023, and ensure that 100% of all FADs deployed be retrieved;
- All CPCs must aim to agree to FAD closures in the high seas for at least a four-month period.

WWF calls on CPCs to ensure compliance to the improved dFAD management proposal, which takes into account the above priorities. WWF is seriously concerned by the impact of dFADs on ecosystems and co-dependent stocks in the Indian Ocean.

**Adopt a management procedure for tropical tuna species and address deficiencies to strengthen harvest control rules and move towards a multi-species tropical tuna management measure by 2025.**

The discussions on management procedures for tropical tuna species have been ongoing for years, but have not been adopted. The yellowfin tuna management proposal has been superseded by the discussions around the interim rebuilding plan and due to Covid-19, has not progressed. The skipjack tuna has a harvest strategy (Resolution 16/02) and in 2020 was assessed by the IOTC using the stock synthesis model with data up to 2019, which revealed only modest change from its previous assessment undertaken in 2017. According to the stock assessment by IOTC, skipjack tuna stock is determined to be i) above the adopted biomass target reference point ii) not overfished and iii) not subject to overfishing.

A total allowable catch limit was adopted based on the harvest strategies for 470,000 tonnes for the period of 2018-2020. This catch limit was breached for all three years and the catch for skipjack remained higher than the agreed limit. Despite this, the harvest control rules were not triggered. In 2020, the IOTC Scientific Committee determined a new catch limit for 2021-2023 (513,572 mt). WWF had warned that this catch limit is higher than previously agreed and it would have an impact on associated tuna stocks. The catch in 2021 (650,331t) was 27% higher than the resulting catch limit and exceeded the 2020 level by 17% and provides a need for the Commission to ensure that catches of skipjack tuna do not exceed the agreed limit and ensure that the impact on associated tuna stocks (bigeye and yellowfin tuna) is reduced. It is concerning that the total allowable catch (TAC) limits are not respected and enforced. Furthermore, the impact of increased catches of skipjack have an impact on juvenile yellowfin tuna catches, which school together with mature skipjack tuna, and the species are caught

together. WWF is very concerned about the continuous overshooting of the TAC by CPCs, WWF urges that all these rules of the game be developed through a management procedure ahead of time, rather than being subjective and adopted on an ad-hoc basis.

- Address the deficiencies in the harvest control rules (Resolution 16/02) to **avoid continued overshooting of skipjack catches**
- Ensure effective measures are in place and harvest control rules (HCR) are triggered to avoid continued over-catch of skipjack to the total allowable catch (TAC) for 2021-2023 at 513,572 mt;
- Determine the environmental impacts of overshooting of skipjack TAC and assess the extraordinary circumstances for evaluating a TAC based on HCR;
- Close monitoring is needed. Any decisions for skipjack must complement efforts to rebuild yellowfin tuna stocks, through the adoption of a multi-species management reference point where the impact of a fishery (all gears combined) cannot decrease co-dependent stocks to below MSY;
- Accelerate the process of an ecosystem-based harvest strategy approach for all tropical tuna with a drastic reduction of fishing effort, area closures, gear type provision, and evaluate the effects of spatial/seasonal closures.

Moreover, the international community has reiterated the urgent need to further integrate ecosystem approaches into fisheries conservation and management addressing bycatch, habitat destruction and overfishing<sup>2</sup>. In IOTC, a tropical tuna CMM is essential to address the unsustainable race to fish where there is no mitigating impact on the other tropical tuna species.

- Support the science to adopt **multi-species tropical tuna management measures** by 2025 where the impact of a fishery (all gears combined) **cannot decrease co-dependent stocks to below MSY and/or biological limits**.

**Regulate and improve data reporting on driftnet fishery (less or equal to 2.5 km) in the Indian Ocean, allow for transition (phase out) and/or conversion to fishing gears that reduce impact on ecosystems and marine megafauna.**

The United Nations General Assembly (UNGA) Resolution 46/215 called for a global moratorium on large-scale high seas driftnet fishing in 1992. Since then, UNGA regulations have been translated into an IOTC resolution 12/12 and further superseded by resolution 17/07, which both prohibits the use of large-scale driftnets on the high seas and in the IOTC area of competence. However, some countries still use large-scale driftnets in both EEZ and high seas to target tuna. Based on the IOTC resolution 17/07, which came into effect on 1 January 2022, WWF calls for urgent action from developing coastal states using large-scale driftnets to show their commitment to change and to ensure that there are support systems in place for implementing the UNGA and IOTC resolutions through the national program or legislation. As of 1 January 2018, Pakistan is the only country who has submitted a formal objection to his measure. Moreover, WWF urges the following:

- All CPCs fishing primarily with large-scale driftnets reduce their net lengths to 2.5 km or less and ensure data collection and reporting to IOTC is improved significantly;
- Phase out or convert gillnet fishing vessels to other gears, considering the huge ecological impact of these gears, and fast track the implementation of Resolution 17/07, “On the Prohibition to use large-scale driftnets in the IOTC”;

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<sup>2</sup> See last Resolution adopted by the General Assembly on 10 December 2019. 74/18. Sustainable fisheries, including through the 1995 Agreement for the Implementation of the Provisions of the United Nations Convention on the Law of the Sea of 10 December 1982 relating to the Conservation and Management of Straddling Fish Stocks and Highly Migratory Fish Stocks, and related instruments.

- IOTC undertook a socio-economic study to determine the main drivers of the fishery, its economic implications and gear selectivity, building a strong rationale and justification to transition the driftnet fisheries;
- All CPCs engaged in catching large pelagics using gillnets/driftnets, including tuna, are encouraged to have a time closure on the use of gillnets for at least two months, from 0000 hours, 1 June until 0000 hours, 30 July of each year;
- WWF encourages CPCs engaged in catch of tuna primarily with drift gillnets to work alongside other CPCs and IOTC secretariat among other key stakeholders to transform gillnets and collectively work on proposing a new CMM regulating gillnets in the IOTC area of competence while adopting best practices for reduced bycatch.

**Ensure human and labour rights and safety for crew, and adopt measures for safety and security of human observers on large-scale, industrial tuna vessels.**

Data acquisition and validity are key for developing effective fisheries management. It is essential that observers be deployed to gather quality data to ensure long-term sustainability of tuna stocks. In addition to ensuring that fishing takes place legally and sustainably, observers have an obligation to report illegal activities. The very nature of their responsibilities leaves them at risk of intimidation and abuse. WWF welcomes the international recognition of the dangerous nature of these crucial jobs at sea.

Yet increasing instances of fisheries observer deaths, as well as violations of fishing crew welfare, have been reported to authorities and NGOs in recent years. WWF is disturbed by this trend and takes these reports very seriously. Considering the COVID-19 pandemic poses serious risk to human and crew health and safety, WWF calls on CPCs to:

- Ensure there is transparency by vessel operators and fishery managers providing 100% transparency and accountable reports that include all aspects of fishing of public resources in general, and investigations into human and labour rights violation in particular;
- Ensure licensing authorities must keep accurate records and register vessels and crew, undertaking due diligence to prevent such incidents which violate human and labour rights;
- Adopt the Conservation and Management Measure for Observer Safety and Security similar to WCPFC (CMM 2017-01 and, building on the Resolution 2018-01) and develop Labour Standards for Crew on Fishing Vessels, establishing a formal and binding CMM on crew welfare;
- Propose and adopt a new resolution for Contracting Parties to ratify and effectively/fully implement relevant conventions, such as the ILO 188, and take other measures to ensure safe and decent working and living conditions on board vessels;
- Adopt a binding measure that ensures the safety of human observers on board tuna fishing, supply and carrier vessels.

**Improve conservation and management of endangered, threatened and protected (ETP) species.**

WWF is committed to the protection and conservation of sharks and rays, sea turtles, seabirds and marine mammals, and calls for more urgent action and funding to improve the protection and recovery of these key species. WWF supports the measures currently adopted by IOTC for sharks, however, the pace of management improvements is behind that required to address alarming declines in pelagic shark and ray populations in the Indian Ocean. Moreover, associated mortality of unwanted or bycatch species remains to be very high. In the IO, it is estimated that over 100,000 (individuals) cetaceans (dolphins, whales and porpoises) may be caught in the IO tuna fisheries, whereas, for sharks and rays, sea turtles and seabirds, the associated impact from tuna fisheries remains to be undetermined.

WWF urges all CPCs to prioritize ETP species conservation and management, and expedite the adoption of mitigation measures, in addition to the following:

### **For sharks and rays**

Sharks are not considered to be managed directly under the IOTC mandate, however, are frequently caught in association with fisheries targeting tuna and tuna-like species. The level of reporting on sharks and rays vary significantly by CPCs, with gillnets responsible for 40% of the reported catch, followed by line gear (hand lines, coastal longlines, and troll lines). Given the perilous state of some of these sharks and rays, the IOTC Parties should proceed with developing recovery plans for the most threatened species even if IOTC has not yet been able to undertake a stock assessment. The FAO Code of Conduct for Responsible Fisheries and CBD Aichi Target 6 state that recovery plans should be put into place for depleted species. The compliance and/or implementation by CPCs on the national plan of action for sharks and rays is poor and requires immediate and urgent action ensuring that the recent CITES listings of sharks and rays call for action must not be ignored and respond to the Commission request on developing action plans on species in decline and;

- Develop immediately and adopt as early as 1 January 2024, recovery/action plans for shark species (such as scalloped hammerhead, oceanic whitetip and short-fin mako) in dire need of attention,, which have progressively shown signs of decline in abundance and class size. RECALLING the request by the Commission to develop research plans for sharks, that the Commission endorses the creation of a working group to work intersessionally to develop a series of research plans/program for sharks with scalloped hammerhead as a priority species.
- Recommend that CPCs consider the results of the Ecological Risk Assessment (ERA) to develop management advice where scientific information on stock status is uncertain or undetermined, in particular for species most susceptible and least productive among the sharks and rays.
- With immediate effect, amend Resolution 15/01 for each fishing gear, to ensure that all species groups under the current broad categories (e.g. Hammerhead sharks, mako sharks) are reported separately by species (e.g. scalloped, great and smooth hammerhead)
- Build capacity among CPCs who engage in catch of tuna and tuna like-species having high catch of sharks and rays to reduce interactions and mortality by prioritising multi-taxa bycatch mitigation approaches.
- Require fins naturally attached for ALL (i.e., fresh and frozen) sharks without exceptions, adopting the globally acknowledged best practice to prevent finning.
- Continue to work with interested and affected parties to implement improved practices to ensure live and uninjured release of sharks and rays in all fisheries and calls on the Scientific Committee to hold a workshop for best practice for new and innovative release techniques that can be implemented by fishing vessels.
- Continue the bycatch working group within the Kobe joint tRFMO process in order to develop and share approaches across tRFMOs to evaluate the implementation and effectiveness of bycatch CMMs.

### **For sea turtles**

The IOTC CPCs are not compliant with data collection and reporting requirements for sea turtles and the interactions with fishing gears are not reported at the species level. It is recommended by the Scientific Committee that CPCs should declare all fisheries interactions of sea turtles at species level. The impact on sea turtle populations from fishing for tuna and tuna-like species is not assessed adequately and the available evidence indicates that sea turtles are at considerable risk in the Indian Ocean, given they have high mortality associated with gillnet fisheries. In order to improve the status of sea turtles and respond to the risk of high mortality, following is recommended:

- Improve data collection and reporting for sea turtles mandatory at the species level by implementing the Scientific Committee advice and by making amendments to IOTC resolution 12/04.
- Call on all CPCs to investigate and urgently adopt means to reduce sea turtle bycatch at-vessels and post-release mortality in IOTC fisheries.



### For seabirds

- Encourage Contracting Parties to amend the Resolution 12/06 on seabird conservation to include hook-shielding devices as a possible mitigation measure and require that all seabirds are identified to species level.

### For cetaceans

WWF is concerned about the state of marine mammals in the Indian Ocean, as inaction is resulting in ongoing declines in cetacean populations. It is estimated that over 100,000 (individuals) cetaceans may be caught in the Indian Ocean tuna fisheries each year. WWF urges CPCs to:

- Report sighting data from observer or equivalent data collection programmes to ensure that any interactions with cetaceans are reported to the IOTC.
- Work with the International Whaling Commission Bycatch Mitigation Initiative to develop and implement bycatch prevention and mitigation options for small and large cetaceans that may interact with tuna vessels.

### Conclusion

WWF remains concerned about the state of tropical and neritic tuna management in the Indian Ocean. Efforts made at the Commission meeting in 2021 and 2022 to adopt a robust interim rebuilding plan for yellowfin tuna were undertaken, but several objections were lodged by CPCs. WWF encourages all CPCs to come together with clear commitments at the 27th annual session. For a robust rebuilding plan to be effective, the objections must be removed to allow for yellowfin tuna stocks to recover by reducing fishing mortality both in the high seas as well as the EEZs, considering that tuna are highly migratory species and must be collectively managed.

WWF is committed to support the developing coastal states in improving data collection, reducing impact of fisheries on ETP species, phasing out gillnets, and ensuring overall health of the ocean is improved through a robust recovery/rebuilding plan for yellowfin tuna, which are ultimately managed at a biological limit.

Considering the current state of play, WWF urges that all these rules of the game be developed through a management procedure ahead of time, rather than being subjective and adopted on an ad-hoc basis. WWF recommends advancing science in order to move towards a multi-species management approach by 2025.

WWF is ready to support coastal states in facilitating projects for improved data collection from small-scale fisheries, in addition to providing capacity building and tools for developing training courses for improving species identification by operators/skippers and crew to improve conservation and management of ETP species leading to improved handling, release and reporting. WWF is committed to the long-term sustainability of ocean resources and securing its vitality for food security, ocean resilience, ecosystem health and means of income generation and jobs for coastal communities.



**Why we are here**

To stop the degradation of the planet's natural environment and to build a future in which humans live in harmony with nature.

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