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ADDENDUM 1 TO RESPONSES TO LETTERS FROM THE CHAIR

ADDENDUM 1 AUX RÉPONSES AUX LETTRES DU PRÉSIDENT

ADENDA 1 A LAS RESPUESTAS A LAS CARTAS DEL PRESIDENTE

This addendum contains responses to the letters sent by the Chair of the Compliance Committee from the following CPCs since the publication of **COC-309/2026** (responses received after 16 October 2026):

Cet addendum contient les réponses des CPC suivantes aux lettres envoyées par le Président du Comite d'Application depuis la publication du **COC-309/2026** (réponses reçues aprèss le 16 octobre 2026) :

Este adendum contiene las respuestas a las cartas enviadas por el presidente del Comité de cumplimiento de las siguientes CPC desde la publicación del documento **COC-309/2026** (respuestas recibidas después s del 16 de octubre de 2026):

The Gambia

Brazil

Venezuela

Sao Tomé-et-Príncipe

Barbados

COMPLIANCE LETTER RESPONSE TEMPLATE

2025 COMMISSION MEETING			
CPC: THE GAMBIA			
AREA OF DEFICIENCY	**SPECIFIC ELEMENTS**	**REMEDIAL ACTION BY THE CPC**	**DATE MISSING/REQUESTED DATA & INFORMATION WAS SENT** *(if applicable)*
CATEGORY A			
Compliance Tables	Rec. 18-07: No compliance tables received.	The compliance table has been submitted to the ICCAT Secretariat. It was previously submitted on November 14, 2023, and November 13, 2024. Most recently, we submitted the table containing information for both 2024 and 2025 on October 16, 2026	2026-10-16, 2024-11-13, 2023-11-14
Capacity, size, gear, time, area restrictions		The Gambia maintains no flagged or authorized industrial fleet targeting ICCAT species within the Convention Area, nor did any ICCAT-authorized foreign fishing vessels offload or land catches in Gambian ports during the reporting period. Management measures relating to vessel capacity, size limits, gear specifications, applicable to national fisheries alongside relevant research updates are fully detailed and reported in The Gambia's Annual Report to ICCAT	N/A
CATEGORY B			
Annual Report	Annual Report IOMS & Word not received.	Annual Report, word and IOMS has been Sent	Word submitted on 2026-09-15, IOMS submitted 15 &16 October 2026
Statistical Data	No ST03 form sent (Rec. 66-01 and Rec. 05-09).	ST03 Sent and Processed through the IOMS	2026 – 08- 15
	ST04 form sent (Rec. 66-01 and Rec. 05-09).	ST04 Sent and Processed through the IOMS	2026 – 08- 15
	No ST09 form sent (Rec. 16-14, national scientific observer programme).	ST09 Sent and Processed through the IOMS	2026 – 08- 15
Other Reports	Rec. 18-05: BIL sheet not received (never submitted).	Bilfish Check sheet Submitted	2026-10-16
	Rec. 18-06: SHK sheet received late.	Shark implementation Check sheet Submitted	2026- 10- 15
CATEGORY C			
MCS-Species Related	Rec. 22-12 (Para 8): No information on the implementation of the turtle measures, either under requirement M:BYC01 of *Part 2, Section 3 of the Annual Report ("Online Reporting") in IOMS* or in the Annual Report Word file under	The Gambia maintains no flagged or authorized industrial fleet targeting ICCAT species within the Convention Area, nor did any ICCAT-authorized foreign fishing vessels offload or land catches in Gambian ports during the reporting period. Management measures relating to vessel capacity, size limits, gear specifications, applicable to national fisheries alongside relevant research updates are fully	

	Section 2.1 Implementation of ICCAT conservation and management measures.	detailed and reported in The Gambia's Annual Report to ICCAT	
MCS General	Rec. 16-14 (Paras 4 and 10): No information on the domestic observer programme in place was submitted through ST09 or in the Annual Report (under requirement S:GEN11 of *Part 1, Section 3 of the Annual Report ("Online Reporting") in IOMS* or in the Annual Report Word file under *Section 1.2 Research and statistics.*	The Gambia maintains no flagged or authorized industrial fleet targeting ICCAT species within the Convention Area, nor did any ICCAT-authorized foreign fishing vessels offload or land catches in Gambian ports during the reporting period. However, Empty ST09 Submitted and Information about domestic observer program is captured	2026-09-15
Port Controls	Rec. 24-15 (Appendix 3, Para 6): No information on in-port transhipment. No response to requirement M:GEN06b in *Part 2, Section 3 of the Annual Report ("Online Reporting") in IOMS*. If N/A is selected, a detailed justification must be provided. Otherwise, form CP37-TransRep must be submitted to the Secretariat and the submission date entered in IOMS, together with any relevant clarification from the CPC.	The Gambia maintains no flagged industrial fleet targeting ICCAT species within the Convention area. Furthermore, no landing or offloading of catches by ICCAT-authorised vessels occurred in Gambian ports during the reporting period. However this has been reported on *Section 3 of the Annual Report ("Online Reporting") in IOMS.*	2026-10-15
Vessel Controls		The Gambia maintains no flagged industrial fleet targeting ICCAT species within the Convention area. Furthermore, no landing or offloading of catches by ICCAT-authorised vessels occurred in Gambian ports during the reporting period.	N/A
OTHER	No reply to COC Chair's letter (ID) received.	THE GAMBIA SHALL RESPOND TO THE CHAIR'S LETTER.	

* Relevant remedial actions should be applied broadly, to include actions taken or planned to address the matter identified by the COC and may include actions initiated by the CPC prior to COC raising the matter. Actions could include, inter alia, changes to applicable laws and regulations, policies, organizational structures, and enforcement priorities, as strengthening institutions such as through increased funding and seeking/participating in capacity building and technical assistance.

INTERNATIONAL COMMISSION FOR THE CONSERVATION OF ATLANTIC TUNAS

COMMISSION INTERNATIONALE POUR LA CONSERVATION DES THONIDES DE L'ANTIQUE

COMISION INTERNACIONAL PARA LA CONSERVACION DEL ATUN ATLANTICO

ACTION PLAN RESPONSE TEMPLATE
2025 COMMISSION MEETING

CPC (Contracting Party/Cooperating Non-Contracting Party, Entity or Fishing Entity):

THE GAMBIA

Date of submission or revision *(17/10/2026)*:

DEFICIENCES TO BE ADDRESSED
[List the specific issues identified by the COC in its letter to the CPC] • **Compliance Tables:** Non-receipt of compliance tables under Rec. 18-07. • **Annual Reports & Statistics:** Missing Annual Report (IOMS & Word formats) and missing statistical forms ST03, ST04, and ST09 (Rec. 66-01, 05-09, 16-14). • **Other Reports:** Missing Billfish check sheet (Rec. 18-05) and late submission of the Shark implementation check sheet (Rec. 18-06). • **MCS & Species-Related Measures:** Lack of reporting on turtle implementation measures (Rec. 22-12) and domestic observer programme information (Rec. 16-14). • **Port & Vessel Controls:** Missing information on in-port transhipment / lack of formal response to requirement M:GEN06b in IOMS (Rec. 24-15) and general vessel control compliance reporting. • **Correspondence:** Initial lack of formal reply to the COC Chair's letter.
SUMMARY INTRODUCTION
[Provide a brief context on the issues and the purpose of this Action Plan] This Action Plan outlines the corrective measures and administrative protocols implemented by The Gambia to address compliance observations raised by the ICCAT Compliance Committee (COC). Although The Gambia does not possess a flagged industrial fleet targeting ICCAT species and experiences no industrial landings by ICCAT-authorized vessels, the administration is fully committed to closing reporting gaps, ensuring timely data transmission through the IOMS, and fulfilling all administrative and transparency requirements under ICCAT conservation and management measures.

ACTION ITEMS

[List and describe the concrete steps the CPC will implement, including where applicable the legally binding nature of the action]

- **Submission of Outstanding Reports and Data:** Finalize and upload all overdue compliance tables, Annual Reports (Word and IOMS), statistical forms (ST03, ST04, ST09), and species check sheets (Billfish and Sharks). completed or provided with explicit "Not Applicable" justifications on the IOMS.
- Convening internal meetings at the Ministry of Fisheries to review compliance obligations, while actively strengthening interaction and information sharing between the Monitoring, Control, and Surveillance (MCS) unit and the Research and Development Unit to reduce future reporting bottlenecks.
- **Enhancement of IOMS Reporting Rigor:** Ensure all mandatory online reporting fields including turtle conservation measures (Rec. 22-12), domestic observer requirements (Rec. 16-14), and port state control / transhipment declarations (Rec. 24-15) are systematically completed or provided with explicit "Not Applicable" justifications.

PLAN OF IMPLEMENTATION

[Describe how each action will be executed, responsible parties, and resource allocation]

The Gambia is working on registering all Artisanal fishing canoes in The Gambia. Already, all coastal landing sites registration is complete, we are moving towards the inland which will make it possible for The Gambia to report on fleet characteristics (Task 1 and 2). Since The Gambia has no flagged industrial vessels targeting tuna species, all the data reported in Task 1 ST02 is either landing and bycatch from the Artisanal fisheries.

Working on improving the capacity of data collectors and artisanal fisheries landing sites, especially in species identification and biological sampling. Additionally, we have requested support for capacity development under the JCAT initiative; this will help close some of the data gaps.

We will institute periodic updates for the Permanent Secretary and the core team regarding our reporting status to ensure we remain on track to fulfill our obligations and secure executive support for resolving any bottlenecks. Additionally, we will meet internally at the Ministry of Fisheries to address operational issues and actively strengthen interaction and information sharing between the Monitoring, Control, and Surveillance (MCS) unit and the Research and Development Unit.

Execution & Responsible Parties: The Gambia. coordinates data collation with national enumerators and maritime partners.

- **Resource Allocation:** Utilization of existing national fisheries data systems, KoboToolbox survey platforms, and designated national IOMS focal points to streamline reporting workflows.

TIMELINE / INCREMENTAL BENCHMARKS FOR COMPLETION

[Outline the schedule with milestones for each corrective action, including where applicable dates that planned actions will enter into effect]

- **August 15, 2026:** Submission and processing of statistical forms ST03, ST04, and ST09 through the IOMS completed or provided with explicit "Not Applicable" justifications.
- **September 15, 2026:** Submission of the Annual Report (Word format) and submission of empty ST09 with domestic observer tracking notes.
- **October 15 – October 16, 2026:** Finalization and submission of the Shark implementation check sheet, Billfish check sheet, IOMS Annual Report components, and the updated compliance table covering 2024–2025.
- **Ongoing:** Continuous monitoring and compliance check protocols for future reporting cycles.

EXPECTED IMPROVEMENTS / OUTCOMES IN THE NEXT YEAR

[Specify measurable improvements expected as a result of the plan]

- **100% Timely Reporting Rate:** Zero overdue submissions for upcoming compliance tables, annual reports, and standard data forms (ST series).
- **Complete Transparency:** Comprehensive coverage of zero-fleet and zero-landing declarations within the IOMS online portal, eliminating gaps in mandatory species and MCS fields.

DIFFICULTIES ENCOUNTERED / ALTERNATIVE ACTIONS TAKEN

[Describe any challenges faced during implementation and adjustments made]

- **Challenges Faced:** Administrative constraints and logistics in coordinating multi-source artisanal and port data synchronization.
- **Alternative Actions Taken:** Re-prioritization of workflow schedules, direct engagement with the IOMS portal to clear backlogs, and comprehensive consolidation of zero-fleet justifications where industrial activities are absent.

CONCLUDING SUMMARY

[Summarise the overall approach and commitment to resolving the deficiencies]

The Gambia reaffirms its dedication to international fisheries governance and sustainable management principles. By clearing all pending reporting backlogs and establishing robust internal administrative tracking, The Gambia ensures full transparency regarding its operational profile and complete alignment with ICCAT requirements. It is worth Nothing some of the reporting deficiencies especially those ST02 and ST09 were due to the fact that the Gambia does not have flagged vessels targeting ICCAT vessels. However following a clarification by the ICCAT Secretariat and the compliance committee that in that situation the Gambia should submit empty forms of tasks 1 & 2 in Areas that are not Applicable to us. We also note that issues of compliance table keeps appearing in out reporting deficiencies even The Gambia had done two previous submissions. We note in in our archives that the compliance table for 2024 was not submitted which must have been an oversight on out side. However we have incorporated the information in CP19 for 2026.

LIST OF APPENDICES AND ATTACHMENTS

[If applicable, list appendices or attachments with additional information, such as copies or excerpts of relevant laws, regulations, administrative actions, procedures, and policies]

- **Appendix A:** Submitted Compliance Table (covering 2024 and 2025, submitted October 16, 2026).
- **Appendix B:** Summary receipts of IOMS submissions for Annual Reports and statistical forms (ST03, ST04, ST09).
- **Appendix C:** Copies of submitted Billfish and Shark implementation check sheets.

INTERNATIONAL COMMISSION FOR THE CONSERVATION OF ATLANTIC TUNAS

COMMISSION INTERNATIONALE POUR LA CONSERVATION DES THONIDES DE L'ATLANTIQUE

ICCAT CICTA CICAA

COMISION INTERNACIONAL PARA LA CONSERVACION DEL ATUN ATLANTICO

COMPLIANCE LETTER RESPONSE TEMPLATE

2025 COMMISSION MEETING			
CPC: BRAZIL			
AREA OF DEFICIENCY	**SPECIFIC ELEMENTS**	**REMEDIAL ACTION TAKEN***	**DATE MISSING/REQUESTED DATA & INFORMATION WAS SENT** *(if applicable)*
CATEGORY A			
Compliance Tables	Rec. 18-07: Compliance tables received late.	Brazil acknowledges that the COC Reporting Tables were submitted after the established deadline, on 11 September 2026. The delay resulted from the additional time required to compile, review and validate the relevant information. Brazil is strengthening its internal reporting procedures, including the establishment of clearer deadlines for data provision, consolidation, quality control and submission, with a view to ensuring timely reporting in future cycles.	11 September 2026
Capacity, size, gear, time, area restrictions			
CATEGORY B			
Annual Report			
Statistical Data	No ST07 form sent (Rec. 24-01).	Brazil understands that Form ST07 concerns reporting requirements related to fish aggregating devices (FADs) under Recommendation 24-01. As Brazil does not conduct FAD-associated fishing operations subject to this reporting requirement, Brazil considers Form ST07 not applicable to its fisheries for the reporting period concerned. Brazil remains available to provide any additional clarification requested by the Secretariat.	
	No ST08 form sent (Rec. 24-01).	Brazil understands that Form ST08 concerns reporting requirements related to fish aggregating devices (FADs) under Recommendation 24-01. As Brazil does not conduct FAD-associated fishing operations subject to this reporting requirement, Brazil considers Form ST08 not applicable to its fisheries	

		for the reporting period concerned. Brazil remains available to provide any additional clarification requested by the Secretariat.	
	No ST09 form sent (Rec. 16-14, national scientific observer programme).	Brazil has strengthened its monitoring of tuna and tuna-like fisheries, including port-based data collection, since late 2023. On 1 January 2024, Brazil launched the Tuna and Tuna-like Species Monitoring Programme (PMPA), a four-year national research and data-collection initiative that includes onboard scientific observer activities and monitoring of landings along the Brazilian coast. Implemented under Cooperation Agreement TED No. 14/2023 between MPA and UFRPE, the programme has an allocated budget of approximately EUR 2 million. The information required in Form ST09 was submitted through IOMS on 11 September 2026, after the applicable deadline. Brazil acknowledges this delay and is improving its internal coordination and reporting procedures to support timely submissions in subsequent years.	11 September 2026
Other Reports	Rec. 18-05: BIL sheet received late.	Brazil acknowledges the late submission of the BIL reporting sheet under Recommendation 18-05. The information was forwarded for submission on 11 September 2026; however, due to an administrative processing error, it was received by the Secretariat only on 18 September 2026. Brazil regrets this delay and is strengthening internal document-transmission, verification and follow-up procedures to prevent similar occurrences in future reporting cycles.	18 September 2026
	Rec. 18-06: SHK sheet received late.	Brazil acknowledges the late submission of the SHK reporting sheet under Recommendation 18-06. The information was forwarded for submission on 11 September 2026; however, due to an administrative processing error, it was received by the Secretariat only on 18 September 2026.	18 September 2026

		Brazil regrets this delay and is strengthening internal document-transmission, verification and follow-up procedures to prevent similar occurrences in future reporting cycles.	
CATEGORY C			
MCS-Species Related	Rec. 22-11: No SMA-S monthly landings report. Request information on the statistical methodology used to estimate dead discards and live releases.	Brazil acknowledges that it has not yet submitted the requested statistical methodology for estimating dead discards and live releases under Recommendation 22-11. The main constraint has been the limited availability of relevant scientific observer data needed to develop and substantiate robust estimates. Following the implementation of the PMPA and a review of other available sources of information, Brazil is working to develop and document an appropriate estimation methodology, with the aim of submitting it during the next reporting cycle. Brazil also recognizes the outstanding monthly landings reporting requirement identified by the Committee and is reviewing the information and procedures necessary to address it.	
	Rec. 11-09: No CP44. Some info in IOMS.	Brazil acknowledges that Form CP44 was not submitted due to an administrative oversight. Brazil notes that information already provided through IOMS reflects the implementation of the relevant provisions of Recommendation 11-09. Brazil intends to submit the outstanding CP44 form before the next annual meeting of the Commission and is reinforcing its internal reporting checks to avoid similar omissions.	
	Rec. 24-01: Vessels actively fishing TROP species but not active in the ICCAT TROP list of vessels.	Brazil identified and corrected the inconsistency between vessels engaged in fishing for tropical tuna species and their active status on the ICCAT tropical tuna vessel list. In parallel, Brazil is modernizing its vessel registration and monitoring procedures and strengthening data cross-checks to reduce the risk of similar discrepancies in the future.	
MCS General	Rec. 16-14 (Paras 4 and 10): No information on the domestic observer	Brazil has strengthened its monitoring of tuna and tuna-like	11 September 2026

	programme in place was submitted through ST09 or in the Annual Report (under requirement S:GEN11 of *Part 1, Section 3 of the Annual Report ("Online Reporting") in IOMS* or in the Annual Report Word file under *Section 1.2 Research and statistics.*	fisheries, including port-based data collection, since late 2023. On 1 January 2024, Brazil launched the Tuna and Tuna-like Species Monitoring Programme (PMPA), a four-year national research and data-collection initiative that includes onboard scientific observer activities and monitoring of landings along the Brazilian coast. Implemented under Cooperation Agreement TED No. 14/2023 between MPA and UFRPE, the programme has an allocated budget of approximately EUR 2 million. Information concerning the national scientific observer programme was submitted in Form ST09 through IOMS on 11 September 2026, after the applicable deadline. Brazil acknowledges the delay and is strengthening its internal reporting procedures to ensure that information on the programme is provided on time through the required reporting channels in future cycles.	
Port Controls			
Vessel Controls			
OTHER			

***** Relevant remedial actions should be applied broadly, to include actions taken or planned to address the matter identified by the COC and may include actions initiated by the CPC prior to COC raising the matter. Actions could include, inter alia, changes to applicable laws and regulations, policies, organizational structures, and enforcement priorities, as strengthening institutions such as through increased funding and seeking/participating in capacity building and technical assistance.

INTERNATIONAL COMMISSION FOR THE CONSERVATION OF ATLANTIC TUNAS

COMMISSION INTERNATIONALE POUR LA CONSERVATION DES THONIDES DE L'ANTIQUE

COMISION INTERNACIONAL PARA LA CONSERVACION DEL ATUN ATLANTICO

ACTION PLAN RESPONSE TEMPLATE
2025 COMMISSION MEETING

CPC (Contracting Party/Cooperating Non-Contracting Party, Entity or Fishing Entity):

BRAZIL

Date of submission or revision (Day/Month/Year): 19/10/2026

DEFICIENCES TO BE ADDRESSED
1. Reporting timeliness and completeness: late compliance tables (Rec. 18-07), BIL and SHK sheets (Recs. 18-05 and 18-06), and ST09 scientific observer information (Rec. 16-14). 2. Species-related reporting: outstanding South Atlantic shortfin mako (SMA-S) monthly landings information and methodology for estimating dead discards and live releases (Rec. 22-11); CP44 seabird mitigation reporting (Rec. 11-09). 3. Vessel records and applicability: discrepancies involving the ICCAT tropical tuna vessel list and clarification of ST07/ST08 applicability (Rec. 24-01).
SUMMARY INTRODUCTION
Brazil acknowledges the observations raised by the Compliance Committee and remains committed to the timely and accurate fulfilment of its ICCAT obligations. A substantial part of the identified shortcomings relates to domestic coordination, consolidation, validation and transmission of information, rather than the absence of national management or mitigation measures. Brazil already has designated institutional counterparts for ICCAT matters; the priority is therefore to strengthen the national data-reporting protocol and the coordination among the units responsible for producing and submitting information. In parallel, Brazil is advancing in the framework to fisheries monitoring and control systems and preparing a national regulatory to strengthen the implementation of ICCAT obligations. This Action Plan focuses on three complementary actions, proportionate to the deficiencies identified.
ACTION ITEMS
ACTION 1 — Strengthen the national ICCAT data-reporting protocol and administrative coordination. (Addresses deficiencies 1 and 2)

Improve the existing national procedures for compiling, validating, approving, and submitting information to ICCAT, strengthening coordination among responsible units, establishing internal deadlines ahead of ICCAT reporting deadlines, and ensuring timely submissions through IOMS. Particular attention will be given to preventing delays such as those observed in the submission of ST09, BIL, and SHK, which have already been submitted. Regarding CP44, Brazil will complete the pending submission, while ST07 and ST08 are not applicable to Brazilian fisheries.

ACTION 2 — Strengthen monitoring data and modernize information systems. (Addresses deficiencies 1–3)

Build on the PMPA to improve the availability and consistency of landing, catch, bycatch and scientific observer data. Progressively improve data exchange and quality controls across logbooks, vessel registration, authorizations, landing records and vessel monitoring, including reconciliation with ICCAT vessel lists. Review the available evidence for SMA-S reporting and develop a documented methodology for dead discards and live releases, subject to data availability and scientific validation.

ACTION 3 — Develop a stronger national regulatory framework for ICCAT implementation. (Cross-cutting action supporting deficiencies 1–3, particularly recurring in COC and STAT reporting and vessel-control issues)

Prepare national legislation/regulations to clarify institutional responsibilities, strengthen information-sharing and reporting procedures, and reinforce the domestic implementation and monitoring of applicable ICCAT measures. The target is to complete the regulatory development process by the end of 2027, subject to the applicable national legal and administrative procedures. Existing binding national measures, including seabird bycatch mitigation requirements, remain in force.

PLAN OF IMPLEMENTATION

The Ministry of Fisheries and Aquaculture (MPA), through its existing competent technical and administrative units, will coordinate implementation with other relevant authorities and scientific partners.

For Action 1, the MPA will review and strengthen the current national reporting protocol, using an integrated obligations calendar, standardized internal data requests, technical validation and documentary confirmation of submissions.

For Action 2, responsible teams will use information generated by PMPA and progressively improve links among fisheries information systems, prioritizing observer reporting, SMA-S data and consistency of ICCAT vessel lists.

For Action 3, the MPA will coordinate the preparation and internal review of the proposed national regulatory instruments, including consultations and legal review as required. Implementation will draw primarily on existing institutional structures and programme resources.

TIMELINE / INCREMENTAL BENCHMARKS FOR COMPLETION

First quarter of 2027— Action 1: review reporting responsibilities, pending forms and existing workflows; define improvements to the national ICCAT reporting protocol. Action 2: identify priority data gaps and vessel-list inconsistencies. Action 3: organize the regulatory drafting agenda.

During 2027 — Action 1: Apply the strengthened protocol to the relevant ICCAT reporting cycle, including pre-submission checks and confirmation of receipt. Action 2: Progressively implement data-quality and interoperability improvements, conduct periodic vessel-list reconciliation, and present the issues related to SMA-S estimation methodologies for discussion at the next meeting of the SCRS Working Group on Stock Assessment Methods. Action 3: Prepare, consult on, and process the proposed national regulatory instruments.

By 31 December 2027 — Action 3: target completion of the national regulatory development process, subject to legally required procedures and approvals. These milestones reflect planned work and will be reviewed in light of institutional and technical progress.

EXPECTED IMPROVEMENTS / OUTCOMES IN THE NEXT YEAR

Brazil expects:

(i) more timely, complete and traceable ICCAT submissions through a strengthened national reporting protocol;
(ii) Improved administrative coordination and reporting procedures, including clearer documentation of form applicability and submission status;
(iii) more consistent scientific observer, landing and bycatch information supported by PMPA;
(iv) more systematic reconciliation of national vessel records with ICCAT lists; and
(v) measurable progress in the technical basis for SMA-S reporting
(vi) preparation of the national regulatory framework.

DIFFICULTIES ENCOUNTERED / ALTERNATIVE ACTIONS TAKEN

The main challenges are related to Brazil's geographical dimensions and the characteristics of its fishing sector, which includes a significant proportion of small-scale and artisanal fisheries operating across more than 8,000 kilometres of coastline. This creates additional challenges for fisheries monitoring, data collection, and the coordination of information produced by different institutions and systems. Other challenges include uneven historical data coverage, the need to strengthen and progressively re-establish the national onboard scientific observer programme, and improving interoperability among existing fisheries databases. In addition, some of the issues identified are primarily related to administrative coordination and reporting procedures, which can be addressed by strengthening existing institutional arrangements. Brazil is progressively working to overcome these challenges through the consolidation of national fisheries monitoring programmes, the modernization of information systems, and improvements to administrative and regulatory procedures, taking into account available resources and technical capacities.

CONCLUDING SUMMARY

Brazil reaffirms its commitment to implementing ICCAT measures and addressing the COC's observations. The proposed approach combines practical improvements to the existing national reporting protocol with continued strengthening of PMPA, modernization of fisheries monitoring and control systems, and development of a more robust national regulatory framework by the end of 2027. This focused set of actions is intended to address both immediate administrative shortcomings and the underlying conditions affecting the quality, consistency and timeliness of reporting.

LIST OF APPENDICES AND ATTACHMENTS

MODELO DE RESPUESTA A LA CARTA DE CUMPLIMIENTO

REUNIÓN DE LA COMISIÓN DE 2025			
CPC: VENEZUELA			
ÁREA DE LA DEFICIENCIA	**ELEMENTOS ESPECÍFICOS**	**ACCIÓN EMPRENDIDA PARA REMEDIARLO***	**FECHA DE ENVÍO DE LOS DATOS E INFORMACIÓN SOLICITADOS/QUE FALTAN** *(si procede)*
CATEGORÍA A			
Tablas de cumplimiento	Rec. 19-05: Exceso de captura recurrente >5 años. WHM (saldo de 2024: -360,47 t), exceso de captura de BUM (saldo de 2024: -18,50 t).	Es importante acotar que, durante los últimos años, nuestras flotas han superado los límites de captura de aguja blanca establecidos en la Recomendación 19-05. Esta situación, lejos de ser un acto deliberado, es una consecuencia inevitable de las características biológicas y de distribución de los stocks en nuestras aguas nacionales, donde ambas agujas cohabitan con otras especies objetivo. En la mayoría de los casos, los marlines no son la especie principal de captura, sino que se pescan de manera incidental, un fenómeno que es difícil de controlar para nuestras flotas artesanales. Desde hace algunos años se han estado implementando algunas medidas de control para las capturas de estas especies. Entre estas: la implementación de descartes en puerto y el desarrollo e implementación de planes de monitoreo y concientización de los pescadores artesanales e industriales a través de talleres de inducción y formación. La aplicación del descarte cuenta actualmente con un ordenamiento pesquero y norma jurídica, que exhorta al uso de estas capturas excesivas con fines sociales (Rec. 19-05, párr. 10), siendo aprovechados en programas sociales dirigidos a la atención de comunidades vulnerables, así como a la red de comedores escolares e instituciones abocadas a la atención social. En el caso de la aguja azul, en el CP13 presentado el 14/08/2026 se reflejan las capturas y excesos-remanentes para esta especie, donde se puede observar que para el año 2025 no hubo excesos de capturas de esta especie.	
Restricciones de capacidad, talla, arte, tiempo y área			
CATEGORÍA B			
Informe anual			

Datos estadísticos	No ha enviado formulario ST09 (Rec. 16-14, programa interno de observadores científicos).	La República Bolivariana de Venezuela, no ha presentado el formulario ST09 referente a la información sobre el programa interno de observadores científicos, debido a que el mismo aun atraviesa por un proceso de reestructuración operativa y logística que limita temporalmente la cobertura al 100 %, la validez y exigibilidad del marco normativo nacional se mantiene plenamente vigente. Adicionalmente, es de acotar que la flota industrial venezolana ha enfrentado algunas dificultades operativas que ha imposibilitado a la flota operar en su totalidad, por lo cual dificulta la ejecución del programa de observadores a bordo.	
Otros informes	Rec. 18-06: Hoja de comprobación de SHK cumplimentada fuera de plazo.	La República Bolivariana de Venezuela remitió a la Secretaria la hoja de comprobación el 08 de septiembre del 2025 y la Secretaria registro el documento de la siguiente manera: **A esta presentación "M:SHK05", se le ha asignado el número de registro ICCAT: E25-10033, en fecha 9 de septiembre del 2025.** *Es importante acotar que el plazo de entrega es las hojas de comprobación es hasta el 15 de septiembre, por lo que resaltamos que se enviaron en los plazos correspondiente.* Sin embargo, aun seguimos trabajando para mejorar los reportes de nuestras pesquerías, actualizar legislaciones que contemplen las medidas de ICCAT y generar políticas más eficaces que vayan en beneficio de la conservación de los recursos pesqueros y de la soberanía alimentaria de nuestras comunidades pesqueras. Durante el 2025 y 2025 se trabajo para realizar un envío oportuno y sin retrasos.	
Categoría C			
SCV relacionado con especies	Rec. 24-01, párr.13-16): Tarea 1 para las especies tropicales presentada en 2024, pero no se han presentado los informes periódicos correspondientes (las capturas trimestrales/mensuales de túnidos tropicales se comunican a través del CP50-TROP_MQcRp, y las capturas semanales de BET, una vez alcanzado el 80 % del límite de captura, a través del CP59-BET_WcRp). Ambos formularios están disponibles aquí	De acuerdo con lo establecido en la Rec. 24-01, párr. 13-16, los países con límites de capturas para BET asignados en la tabla del párr. 6 de dicha recomendación, deben presentar al COC el formato CP50-TROP_MQcRp para hacer seguimiento y control de excesos de las capturas de BET de sus pesquerías. En primer lugar, Venezuela no aparece en las categorías A y B de la tabla de asignaciones para límites de capturas del patudo y la aplicabilidad del párr. 13 está sujeta a lo dispuesto en el párr. 6. En segundo lugar, a pesar de que Venezuela posee una flota industrial que dirige las capturas a los túnidos tropicales, sus pesquerías están enfocadas en las capturas de YFT y las de BET son muy pequeñas, por lo que, si fuera el caso, no sería necesario hacer seguimiento permanente a sus capturas. Finalmente, Venezuela durante los	

		últimos años ha presentado algunos problemas internos con la actividad de la flota industrial, situación ya menciona en NAT VEN 2026. La República Bolivariana de Venezuela tiene toda la disposición para dar cumplimiento a las medidas y recomendaciones de la comisión, sin embargo, en esta ocasión por las razones antes mencionadas no consideramos necesario el **envío periódico** del CP50-TROP_MQcRp, porque cabe destacar que, si se envía, pero no con la frecuencia que se requiere para países con capturas elevadas de BET.	
SCV general	Rec. 16-14 (párrs. 4 y 10): No se ha presentado ninguna información sobre el programa interno de observadores vigente ni a través del ST09 ni en el Informe anual (en el requisito S:GEN11 de la parte 1, sección 3 del Informe Anual ("Comunicación de información en línea") en el IOMS. Parte de la información se encuentra en el archivo de Word del Informe anual, en la sección 1.2, «Investigación y estadísticas».	La República Bolivariana de Venezuela, no ha presentado información sobre el programa interno de observadores, debido a que el mismo aun atraviesa por un proceso de reestructuración operativa y logística que limita temporalmente la cobertura al 100 %, la validez y exigibilidad del marco normativo nacional se mantiene plenamente vigente. Adicionalmente, es de acotar que la flota industrial venezolana ha enfrentado algunas dificultades operativas que ha imposibilitado a la flota operar en su totalidad, por lo cual dificulta la ejecución del programa de observadores a bordo.	
Controles en puerto			
Controles de los buques			
OTROS			

* Las acciones correctivas pertinentes deben aplicarse de forma amplia, para incluir las acciones emprendidas o previstas para abordar el asunto identificado por el COC y pueden incluir medidas iniciadas por la CPC antes de que el COC planteara el asunto. Las acciones podrían incluir, entre otras cosas, cambios en las leyes y reglamentos aplicables, normativas, estructuras organizativas y prioridades de ejecución, así como el fortalecimiento de las instituciones, por ejemplo mediante el aumento de la financiación y la búsqueda de recursos financieros.

PLAN DE ACCIÓN

VENEZUELA:

Fecha de presentación o revisión (*29/10/2026):*

DEFICIENCIAS QUE DEBEN SUBSANARSE

1. Exceso de captura recurrente >5 años WHM (saldo de 2024: -360,47 t), exceso de captura de BUM (saldo de 2024: -18,50 t).

2. Datos estadísticos No ha enviado formulario ST09 (Rec. 16-14, programa interno de observadores científicos).

3. Hoja de comprobación de SHK cumplimentada fuera de plazo. Rec. 24-01, párrs. 13-16)

4. Tarea 1 para las especies tropicales presentada en 2024, pero no se han presentado los informes periódicos correspondientes (las capturas trimestrales o mensuales de túnidos tropicales se comunican a través de CP50-TROP_MQcRp, y las capturas semanales de BET tras alcanzar el 80 % del límite de captura a través de CP59-BET_WcRp. Ambos formularios están disponibles aquí). Rec. 16-14 (párrs. 4 y 10)

5. No se ha presentado ninguna información sobre el programa interno de observadores vigente ni a través del ST09 ni en el Informe anual (en el requisito S:GEN11 de la parte 1, sección 3 del Informe anual ("Comunicación de información en línea") en el IOMS. Parte de la información se encuentra en el archivo de Word del Informe anual, en la sección 1.2, «Investigación y estadísticas».

RESUMEN INTRODUCTORIO

Durante los últimos años Venezuela ha presentado una serie de dificultades de diferente índole que ha dificultado el desarrollo pleno de actividades pesqueras industriales y el cumplimiento de las hojas de rutas que conducen a las actualizaciones de las normas técnicas de ordenamiento pesqueros (resoluciones y providencias administrativas) necesarias para adoptar legalmente y dar cumplimiento a las medidas y recomendaciones emitidas por la CICAA. El objetivo de este plan es desarrollar alternativas viables y que puedan ser ejecutadas de manera efectiva para cumplir con las medidas de ordenación en pro de la conservación del recurso pesquero en cuestión. Para ello es importante tener en cuenta que en el caso de las pesquerías industriales de Venezuela el seguimiento y control es mas efectivo y controlable que en las pesquerías artesanales, ya que estas son de subsistencia para comunidades vulnerables donde se usan artes de pesca no selectivos y difícil de regular o de prohibir los desembarques.

Es importante resaltar que los desembarques de picudos no entran a los intercambios comerciales de la región caribeña.

PUNTOS DE ACCIÓN

1. **Medidas de acción para reducir las capturas de WHM:**

   - Los excesos de capturas de WHM y BUM son descartadas para el comercio y distribución a nivel nacional. En la pesca industrial, de acuerdo con el párr. 10 de la Rec. 19-05 y la Providencia administrativa N°048/2024, de fecha 15/11/2024, publicada en Gaceta Oficial

de la República Bolivariana de Venezuela N° 43.033 de fecha 20/12/2024, las capturas de esta especie son aprovechadas para fines sociales. En el caso de las pesquerías artesanales, estas especies son aprovechadas por los pescadores directamente en su comunidad, mas no pueden ser distribuidas y comercializadas fuera de su localidad.

- La legislación vigente para picudos (Providencia administrativa N°69/2003, de fecha 8/09/2003, publicada en Gaceta Oficial de la República Bolivariana de Venezuela N° 37.787 de fecha 01/10/2003) contempla las medidas de prohibición y comercialización de capturas de picudos en todo el territorio nacional. Se está realizado una actualización de esta Norma Técnica para que este en consonancia con las actualizaciones de las recomendaciones de la CICAA con respecto a estas especies. Sin embargo, hasta ahora se sigue trabajando con la aplicación y cumplimiento de la legislación vigente.

- Se ha desarrollado un plan interno de distribución de las cuotas de capturas asignadas a Venezuela en la Rec. 19-05, para WHM y BUM, de manera que las flotas industriales y artesanales tengan una cuota interna asignada para cada especie. Esta medida permitirá tener un mayor control de las capturas durante todo el año. Para ello se hace seguimiento mensual de las capturas de WHM y BUM en cada flota y una vez que se este cerca de alcanzar su máximo de capturas se le notifica oficialmente a cada flota que debe iniciar el proceso de descartes de este recurso y que a partir de la fecha asignada queda prohibida completamente su comercialización y distribución de acuerdo con la legislación vigente.

- La cuota asignada para la distribución de las flotas nacionales es limitada a un 70 % de la cuota asignada en la Rec. 19-05 (50 t para WHM y 84,1 t para BUM), de esta manera quedaría un 30 % de esta cuota para subsanar los excesos de captura de estas especies.

2. **Formulario ST09. (argumentos en punto 5)**

3. **Hoja de comprobación de SHK cumplimentada fuera de plazo.** A pesar de que durante el año 2025 hubo muchas dificultades que impidieron el cumplimiento oportuno de algunos requisitos, la República Bolivariana de Venezuela remitió a la secretaria la hoja de comprobación el 08 de septiembre del 2025 y en 2026 se envió el 14/09/2026.

4. **Capturas trimestrales o mensuales de túnidos tropicales (CP50-TROP_MQcRp**). En este caso Venezuela no tomará ninguna medida en particular, a menos que, de acuerdo a las recomendaciones pertinentes se demuestre que debe estrictamente cumplir con el envío de dicho formato. Las razones ya fueron expuestas en la hoja de respuesta al COC.

5. **Programa interno de observadores.**

1. Si bien la República Bolivariana de Venezuela cuenta con el instrumento jurídico formal para el establecimiento del programa mediante la Resolución DM N° 009-24, su implementación regular se ha encontrado temporalmente supeditada a restricciones de índole presupuestaria, limitaciones logísticas para el financiamiento del programa, así como la operatividad de la flota. En consecuencia, al no encontrarse el programa plenamente activo y operando de manera continua durante el período evaluado, no ha sido posible el llenado ni la remisión de los formularios específicos (como el ST09). El Estado venezolano reitera que estas limitaciones son de carácter coyuntural y operativo, y avanza en la estructuración de alternativas viables para su reactivación progresiva.

PLAN DE IMPLEMENTACIÓN

1. Para la implementación de medidas de regulación de excesos de capturas de picudos están asignados funcionarios altamente especializados y capacitados en la identificación de estas especies, así como el manejo de los cuadernos de bitácoras y conocimiento del ordenamiento pesquero vigente para hacer las inspecciones necesarias y registrar toda la información pertinente. Además, se cuenta con la presencia de funcionarios de orden público que son informados y formados en ordenación pesquera para que, dado el caso existan intentos de comercialización y distribución de estos recursos, estos puedan ser interceptados por las autoridades competentes y decomisado el producto, además de la imposición de sanciones y multas por incumplimiento de las normativas establecidas.

2. Venezuela cuenta con personal capacitado para realizar el monitoreo y control de sus pesquerías. Los funcionarios asignados a las actividades de inspección y control de desembarques son financiados por el Ministerio del Poder Popular de Pesca y Acuicultura y sus entes adscritos, en especial el Instituto Socialista de Pesca y Acuicultura – INSOPESCA. Sin embargo, Venezuela no cuenta con los recursos necesarios para la realización de muestreos biológicos (tallas y otros).

3. **En cuanto al programa de observadores.** Consolidación de un mecanismo de gestión interinstitucional y aportes sectoriales bajo los lineamientos de la Resolución DM N° 009-24, orientado a garantizar la sostenibilidad presupuestaria y logística del Programa Nacional de Observadores a Bordo. Ejecución de talleres de formación continua y observadores científicos a bordo, garantizando personal altamente calificado en la recolección de datos biológico-pesqueros y estadísticas de especies de interés para la ICCAT.

CALENDARIO / ETAPAS GRADUALES PARA LA FINALIZACIÓN

1.- Para el desarrollo de las medidas de control de capturas de picudos las fechas dependen estrictamente de la evolución de las capturas y el desarrollo de las actividades en cada pesquería. Para el cumplimiento del pago de la deuda y reducir los excesos de capturas de WHM se estima que disminuyendo un 30 % anual de la cuota asignada en la Rec. 19-05, se espera un plazo entre 10 y 20 años dependiendo de cómo evolucionen las pesquerías nacionales.

2.- Plan de implementación del Programa de Observadores:

Cuarto trimestre del 2026.

- Fase Normativa y Administrativa: Armonización de los protocolos operativos internos previstos en la Resolución DM N° 009-24 con las exigencias de la ICCAT.

- Fase Logística y de Articulación: Establecimiento de mesas de trabajo con los representantes de la flota industrial para coordinar la logística de los embarques de los observadores científicos, la dotación de equipos de seguridad y el suministro de cuadernos de bitácora y formatos digitalizados para la recolección de información y garantizar la seguridad de los observadores científicos a bordo.

- Fase de prueba: Inicio de los embarques de los observadores científicos (personal capacitado con amplia experiencia en esta actividad) en la flota palangrera a partir de noviembre del 2026.

Primer trimestre del 2027.

- Fase de revisión: Evaluación de resultados obtenido durante la fase de prueba para detectar errores y realizar las correcciones pertinentes.

- Fase de Ejecución y Monitoreo: Despliegue de los observadores capacitados a bordo de las embarcaciones de la flota industrial autorizada (4 observadores capacitados).

- Fase de capacitación: desarrollo de talleres de formación a nuevos observadores científicos (2 profesionales) para ir aumentando progresivamente el porcentaje de cobertura que requiere el programa de observadores de acuerdo con la Rec. 14-16. Cabe destacar que el aumento de observadores va a depender de la capacidad financiera disponible, bien sea de armadores, de fondos externos o del Ministerio de Pesca.

Segundo semestre del 2027.

- Fase de revisión: Evaluación de resultados obtenido durante el primer trimestre del 2027, revisión y control de calidad de datos, aplicación de adaptaciones para mejorar los resultados en caso de ser necesario.

- Fase de Ejecución y Monitoreo: Despliegue de los observadores capacitados a bordo de las embarcaciones de la flota industrial autorizada (6 observadores capacitados).

- Fase de capacitación (depende de la actividad de la flota y del porcentaje de cobertura que se obtenga en el primer trimestre del 2027): desarrollo de talleres de formación a nuevos observadores científicos (2 profesionales) para ir aumentando progresivamente el porcentaje de cobertura que requiere el programa de observadores de acuerdo con la Rec. 14-16.

Tercer trimestre del 2027.

- Fase de revisión: Evaluación de resultados obtenido durante el segundo trimestre del 2027, revisión y control de calidad de datos, verificación de porcentaje de cobertura del programa y aplicación de adaptaciones para mejorar los resultados en caso de ser necesario.

- Fase de Ejecución y Monitoreo: Despliegue de los observadores capacitados a bordo de las embarcaciones de la flota industrial autorizada (6 o 8 observadores capacitados).

- Fase de capacitación (depende de la actividad de la flota y del porcentaje de cobertura que se obtenga en el segundo trimestre del 2027): desarrollo de talleres de formación a nuevos observadores científicos (2 profesionales) para ir aumentando progresivamente el porcentaje de cobertura que requiere el programa de observadores de acuerdo con la Rec. 14-16.

Cuarto trimestre del 2027.

- Fase de revisión: Evaluación de resultados obtenido durante los semestres anteriores, revisión y control de calidad de datos, verificación de porcentaje de cobertura del programa y aplicación de adaptaciones para mejorar los resultados en caso de ser necesario para el 2028.

- Fase de Ejecución y Monitoreo: Despliegue de los observadores capacitados a bordo de las embarcaciones de la flota industrial autorizada (6 o 8 observadores capacitados).

- Fase de capacitación: en caso de ser necesario aumentar el número de observadores.

- Fase de análisis: evaluación de resultados obtenidos.

MEJORAS / RESULTADOS PREVISTOS PARA EL AÑO SIGUIENTE

1. Disminución de un 30 % de los excesos de capturas de WHM que permitirá presentar a la comisión un plan de devolución de capturas para la aguja blanca para el año 2027.

2. Programa de observadores activo (sujeto a los diferentes factores que permitirán dar cumplimiento a las actividades programadas en el calendario para el 2027 y dar continuidad en los años siguientes):
    - 2027: se espera una cobertura de 1-2 %
    - 2028: 2-4 %
    - 2029: 5 %

DIFICULTADES ENCONTRADAS / ACCIONES ALTERNATIVAS EMPRENDIDAS

1. A pesar de los desafíos técnicos y socioeconómicos que la República Bolivariana de Venezuela ha afrontado en años recientes, los cuales han generado limitaciones operativas para el seguimiento pleno de ciertas medidas de ordenamiento pesquero, el país reafirma su firme compromiso con los objetivos de conservación de la ICCAT. En este sentido, se mantienen y fortalecen de manera progresiva las acciones interinstitucionales orientadas a garantizar el cumplimiento normativo y la gestión sostenible de los recursos hidrobiológicos.

2. La ejecución de programas de seguimiento para istiofóridos y tiburones en la República Bolivariana de Venezuela se encuentra actualmente supeditada a la disponibilidad de financiamiento y recursos logísticos, lo que ha generado vacíos de información sobre la biología poblacional y dinámicas reproductivas de estas especies en aguas nacionales. Sobre la base de los sólidos antecedentes técnicos del Programa Intensivo de Investigación de Marlines (PIIM-Venezuela), se plantea la importancia de articular esfuerzos regionales de financiamiento que permitan rescatar el monitoreo científico en el marco de las recomendaciones del SCRS de la ICCAT.

RESUMEN FINAL

Venezuela reitera su firme compromiso con los objetivos de conservación y cumplimiento de la ICCAT, adoptando un enfoque de gestión adaptativa que combina el control estricto de las cuotas de captura, especialmente en flotas industriales, la actualización de su marco normativo y la búsqueda de alianzas para la reactivación de programas científicos y de observación. Las acciones descritas en este plan reflejan la voluntad institucional de superar las limitaciones operativas y garantizar una pesca cada vez más responsable.

LISTA DE APÉNDICES Y DOCUMENTOS ADJUNTOS

1. Providencia administrativa N°69/2003, de fecha 8/09/2003, publicada en Gaceta Oficial de la República Bolivariana de Venezuela N° 37.787 de fecha 01/10/2003.

2. Providencia administrativa N°048/2024, de fecha 15/11/2024, publicada en Gaceta Oficial de la República Bolivariana de Venezuela N° 43.033 de fecha 20/12/2024.

3. Providencia administrativa N°009/2024, de fecha 03/10/2024, publicada en Gaceta Oficial de la República Bolivariana de Venezuela N° 42.983 de fecha 11/10/2024.

MODÈLE DE RÉPONSE DE PLAN D'ACTION RÉUNION DE 2025 DE LA COMMISSION

CPC: STP

Date de soumission ou de révision 3/11/2026):

DÉFICIENCES À COMBLER

Les manquements identifiés relèvent de **graves insuffisances récurrentes en matière de déclaration de données, de mise en œuvre des mesures de conservation et de communication** avec la Commission :

Tableaux d'application et rapports généraux

- **Rec. 18-07 :** Les tableaux d'application n'ont pas été reçus.
- **Rapport annuel :** Le Rapport annuel (versions IOMS et Word) **Notre rapport annuel sera mis à jour sur la plateforme IOMS dans les prochains jours.**

- **Données statistiques et formulaires manquants**
- **Formulaire ST03 :** Non soumis (en vertu des Rec. 66-01, Rec. 05-09 et Rec. 25-12).
- **Formulaire ST04 :** Non soumis (en vertu des Rec. 66-01 et Rec. 05-09).
- **Formulaire ST09 :** Non soumis (relatif au programme national d'observateurs scientifiques).

Mesures de conservation liées aux espèces (MCS)

- **Rec. 18-06 (Requins) :** La feuille de contrôle s'appliquant aux requins n'a jamais été reçue.
- **Rec. 22-12, paragraphe 8 (Tortues) :** Aucune information n'a été fournie concernant la mise en œuvre des mesures relatives aux tortues (ni dans l'IOMS, ni dans le fichier Word).
- **Rec. 24-01, paragraphes 13-16 (Thonidés tropicaux) :** Bien que la "Tâche 1" ait été soumise en 2024, aucun rapport périodique correspondant (captures trimestrielles/mensuelles via le formulaire CP50 ou hebdomadaires de thon obèse via le formulaire CP59) n'a été transmis.

Programmes d'observation et contrôles portuaires

- **Rec. 16-14, paragraphes 4 et 10 (Observateurs) :** Absence d'information et non-mise en œuvre du programme national d'observateurs scientifiques.
- **Rec. 24-15, Appendice 3, paragraphe 6 (Transbordement) :** Aucune information sur le transbordement dans les ports n'a été communiquée.

Communication et état des progrès

- **Absence de réponse :** Aucune réponse n'a été envoyée à la précédente lettre du Président du COC concernant le maintien de l'identification.
- **Préoccupations sur le rythme des progrès :** La Commission s'inquiète de la lenteur des avancées, alors même que Sao Tomé-et-Principe a bénéficié d'une mission de renforcement des capacités menée par le Secrétariat en 2023.

INTRODUCTION RÉCAPITULATIVE

CONTEXTE GÉNÉRAL ET OBJECTIFS DU PLAN D ACTION

La République démocratique de São Tomé-et-Príncipe réaffirme son engagement et sa ferme volonté de respecter pleinement les obligations qui lui incombent en matière de gestion durable et de conservation des ressources halieutiques, conformément aux exigences et aux recommandations de la Commission internationale pour la conservation des thonidés de l'Atlantique (ICCAT).

Toutefois, la mise en œuvre effective de ces obligations s'inscrit dans un contexte national caractérisé par d'importantes contraintes structurelles et institutionnelles, qui ont considérablement affecté les capacités opérationnelles de l'administration des pêches au cours des dernières années.

Ces difficultés se manifestent principalement à travers les facteurs suivants :

1. Émigration des cadres et fragilité institutionnelle

Le secteur des pêches est confronté à une perte significative de ressources humaines qualifiées, résultant notamment de l'émigration croissante de cadres et de techniciens spécialisés vers l'étranger. Cette situation a entraîné une diminution importante du capital humain disponible et fragilisé le fonctionnement des services techniques, notamment dans les domaines de la collecte, du traitement et de la transmission des données statistiques, ainsi que du suivi administratif des obligations internationales.

2. Contexte politique et instabilité institutionnelle

Le contexte politique national, marqué par des changements fréquents au sein des institutions et des restructurations administratives successives, a contribué à ralentir les processus décisionnels et à affecter la continuité de certaines réformes. Cette situation a notamment retardé l'adoption et la mise en œuvre de mesures législatives et réglementaires nécessaires à l'application effective des résolutions et recommandations de l'ICCAT.

3. Renouvellement des équipes techniques et insuffisance d'expérience spécialisée

Afin de compenser le départ de plusieurs cadres expérimentés, la Direction des pêches et de l'aquaculture a procédé à l'intégration de nouveaux agents au sein de ses services techniques.

Malgré leur engagement et leur volonté d'assumer leurs responsabilités, ces nouveaux techniciens disposent encore d'une expérience pratique limitée dans certains domaines spécialisés, notamment en matière de collecte, de traitement, d'analyse et de transmission des données statistiques exigées par l'ICCAT. Ils nécessitent, à cet égard, un accompagnement technique et un renforcement ciblé de leurs compétences, particulièrement pour l'utilisation des outils de rapportage de la Commission, notamment la plateforme IOMS, ainsi que pour le remplissage des formulaires statistiques spécifiques.

4. Réalités du secteur halieutique : faiblesse de la flotte nationale et prédominance de la pêche artisanale

La flotte nationale de pêche semi-industrielle demeure limitée et insuffisamment développée, tandis que le secteur halieutique de São Tomé-et-Príncipe repose essentiellement sur une pêche artisanale pratiquée de manière dispersée le long du littoral national.

Dans ce contexte, la mise en place d'un système régulier et harmonisé de suivi, de contrôle et de collecte de données statistiques auprès des communautés de pêcheurs artisanaux constitue un défi opérationnel, logistique et financier considérable pour l'administration nationale. Cette réalité nécessite des approches adaptées aux caractéristiques du secteur, ainsi que des moyens humains, techniques et financiers supplémentaires.

OBJECTIF DU PLAN D ACTION

Le présent Plan d'action ne vise pas uniquement à régulariser les rapports statistiques en retard et à résorber les arriérés de communication d'informations à l'ICCAT. Il ambitionne avant tout de contribuer à la restructuration et au renforcement durable du système national de collecte, de

traitement et de transmission des données statistiques, ainsi que des mécanismes de suivi et de contrôle des activités de pêche, en tenant compte des réalités institutionnelles, techniques et socio-économiques du pays.

À travers ce Plan d'action, la République démocratique de São Tomé-et-Príncipe entend s'engager dans un processus progressif de renforcement de ses capacités nationales, autour des priorités suivantes :

- **Renforcer les capacités des ressources humaines**, à travers la stabilisation, la formation et l'accompagnement technique des nouveaux agents affectés aux services compétents, afin de garantir une meilleure maîtrise des obligations de rapportage auprès de l'ICCAT.
- **Améliorer les mécanismes de collecte et de gestion des données statistiques**, en développant des méthodes adaptées aux spécificités de la pêche artisanale et semi-industrielle et en renforçant la fiabilité, la régularité et la qualité des informations transmises.
- **Solliciter un appui technique et institutionnel ciblé auprès de l'ICCAT et de ses partenaires**, notamment dans les domaines de la formation spécialisée, de l'amélioration des outils de collecte des données et de l'utilisation des plateformes de rapportage.
- **Garantir la conformité progressive aux obligations internationales**, en mettant en place des mécanismes institutionnels et opérationnels permettant d'assurer la continuité du suivi statistique et le respect des exigences de la Commission.
- **Prévenir l'application de mesures de sanction commerciale disproportionnées**, qui pourraient avoir des conséquences particulièrement préjudiciables sur l'économie nationale, les moyens de subsistance des communautés de pêcheurs et la sécurité alimentaire des populations.

La République démocratique de São Tomé-et-Príncipe réaffirme ainsi sa disponibilité à travailler en étroite collaboration avec l'ICCAT et ses partenaires afin de surmonter les difficultés identifiées, de régulariser progressivement ses obligations de rapportage et de consolider durablement ses capacités nationales en matière de gestion et de conservation des ressources halieutiques.

POINTS D'ACTION

MESURES CONCRÈTES ET NATURE JURIDIQUEMENT CONTRAIGNANTE DES ACTIONS
Afin de corriger de manière définitive les manquements identifiés par le Comité d'application (COC), la République démocratique de Sao Tomé-et-Principe s'engage à mettre en œuvre les mesures structurelles et opérationnelles suivantes.

1. Renforcement du cadre réglementaire et nature contraignante de l action
   Le présent Plan d action sera formellement validé par un Arrêté Ministériel du Ministère de l Agriculture, de la Pêche et du Développement Rural. Cet acte juridique confère une nature juridiquement contraignante à l ensemble des mesures et des échéances énoncées ci-dessous. Le non-respect des obligations de rapportage par les opérateurs économiques ou par les agents de l administration fera l objet de sanctions administratives et professionnelles strictes en vertu de la législation nationale des pêches en vigueur.
2. Mesures opérationnelles par domaine d insuffisance

A. Régularisation des obligations de rapportage et des données statistiques (Rec. 18-07, ST03, ST04, ST09)

- Plan d urgence de transmission de données : Internalisation d une task-force statistique au sein de la Direction pour compiler et téléverser sur la plateforme IOMS tous les formulaires manquants (ST03, ST04, ST09) et les Tableaux d application.

- Encadrement et tutorat : Mobilisation d un consultant régional senior, financé sur fonds propres ou via une assistance technique d urgence, pour encadrer et former de manière pratique les techniciens nouvellement intégrés et sans expérience sur les protocoles ICCAT.

B. Suivi et protection des espèces sensibles (Rec. 18-06 et Rec. 22-12)

- Arrêté d'interdiction et de contrôle des requins : Promulgation d'une circulaire ministérielle contraignante rendant obligatoire la soumission de la feuille de contrôle des requins par toutes les structures de contrôle avant l'octroi ou le renouvellement des licences de pêche.
- Protocole de déclaration des tortues marines : Intégration d'une section obligatoire sur les prises accessoires (exigence M:BYC01) dans les formulaires de déchargement de la pêche semi-industrielle et artisanale avancée. Les capitaines de navires seront légalement tenus de déclarer toute interaction avec les tortues sous peine de suspension de leur licence.

C. Gestion des captures de thonidés tropicaux (Rec. 24-01)

- Système d alerte précoce et rapports périodiques : Mise en place d une obligation légale de déclaration mensuelle pour les captures de thonidés tropicaux via le formulaire CP50. En cas d atteinte de 80 % de la limite de capture du thon obèse, un mécanisme de déclaration hebdomadaire obligatoire via le formulaire CP59 sera déclenché sous la supervision directe de l inspection des pêches.

D. Déploiement du programme d observateurs et contrôle des ports (Rec. 16-14 et Rec. 24-15)

- Programme national intérimaire d'observateurs scientifiques : En raison des contraintes économiques de la flotte nationale, un décret ministériel imposera une couverture par des observateurs à quai lors des débarquements stratégiques pour échantillonner les captures, validant ainsi les données du formulaire ST09.
- Registre obligatoire des opérations portuaires : Instauration d un protocole de notification systématique de non-transbordement (N/A dument motivé dans l IOMS) ou, le cas échéant, de transmission obligatoire du formulaire CP37-TransRep pour chaque navire étranger ou national utilisant les infrastructures portuaires du pays.

PLAN DE MISE EN ŒUVRE

La Direction a attribué à chaque technicien des responsabilités spécifiques dans les différents domaines d'intervention. À ce titre, chacun sera tenu de veiller au bon suivi de son domaine de compétence, d'assurer l'exécution effective des tâches qui lui sont confiées et de rendre compte régulièrement des résultats obtenus. La Direction attend donc de chacun un engagement professionnel, un sens élevé des responsabilités et une obligation de résultats.

CALENDRIER / ÉTAPES GRADUELLES POUR L'ACHÈVEMENT

[Décrire le calendrier et les étapes de chaque action corrective, y compris, le cas échéant, les dates de prise d'effet des actions planifiées].

Sous réserve du respect des échéances fixées pour la transmission des données au Secrétariat, les prochaines étapes ainsi que les orientations à suivre vous seront communiquées au début de l'année prochaine.

AMÉLIORATIONS / RÉSULTATS ATTENDUS POUR L'ANNÉE SUIVANTE

l est essentiel de renforcer la coordination et la communication avec le Secrétariat, en veillant à réduire considérablement les insuffisances et les ruptures dans la circulation des informations. Une transmission régulière, complète et dans les délais impartis des données permettra d'améliorer le suivi des activités, d'assurer une meilleure coordination et de garantir le respect du calendrier établi.

DIFFICULTÉS RENCONTRÉES / ACTIONS ALTERNATIVES ENTREPRISES

L'insuffisance de techniciens disposant des compétences requises et faisant preuve d'un engagement professionnel suffisant constitue également un défi majeur. Il est donc nécessaire de renforcer les capacités techniques, de promouvoir l'implication active de chaque collaborateur et de consolider la responsabilisation individuelle afin d'assurer une meilleure efficacité dans la réalisation des missions assignées.

RÉSUMÉ FINAL

La République démocratique de Sao Tomé-et-Principe réaffirme sa volonté de se conformer aux exigences de gestion et de conservation de l ICCAT. Toutefois, la mise en œuvre effective de nos obligations s inscrit dans un contexte national marqué par des défis structurels majeurs qui ont fortement impacté nos capacités opérationnelles ces dernières années.

Renforcement du cadre réglementaire et nature contraignante de l action
Le présent Plan d action sera formellement validé par un Arrêté Ministériel du Ministère de l Agriculture, de la Pêche et du Développement Rural. Cet acte juridique confère une nature juridiquement contraignante à l ensemble des mesures et des échéances énoncées ci-dessous. Le non-respect des obligations de rapportage par les opérateurs économiques ou par les agents de l administration fera l objet de sanctions administratives et professionnelles strictes en vertu de la législation nationale des pêches en vigueur.

Mesures opérationnelles par domaine d insuffisance

Nous sommes actuellement engagés dans un processus de réforme de la politique et du cadre juridique des secteurs de la pêche et de l'aquaculture.

Nous avons récemment adopté notre premier Plan stratégique national pour la pêche et l'aquaculture (PENPA) 2025–2034 ainsi que le Plan de Gestion de la Pêche (PGP) 2025–2029. Le PENPA constitue un instrument stratégique à long terme pour le secteur de la pêche et de l'aquaculture, tandis que le PGP est un instrument à moyen terme pour la gestion et l'exploitation durables des ressources halieutiques. Ces deux textes ont acquis une force juridique contraignante en mars 2026.

Dans le cadre des réformes juridiques engagées, nous avons adopté une nouvelle Loi sur la pêche et l'aquaculture (Loi n° 7/2025), publiée le 29 décembre 2025, ainsi que le Règlement général des activités de pêche, approuvé par le décret n° 34/2006 du 20 juillet.

Par ailleurs, plusieurs autres textes réglementaires ont été élaborés et sont actuellement en attente d'approbation par le Gouvernement, notamment :

- Le Règlement de la pêche artisanale ;

- Le Règlement relatif au système de surveillance des navires (VMS) et au système de déclaration électronique (ERS) ;
- Le Règlement de la pêche récréative.

Parmi les autres réformes engagées figure également l'adhésion de São Tomé-et-Príncipe à l'Initiative pour la transparence dans le secteur de la pêche (FiTI), une initiative volontaire visant à promouvoir la transparence, la redevabilité et l'accès public aux informations relatives à la gestion des ressources halieutiques.

Dans ce cadre, les informations relatives au secteur de la pêche sont progressivement mises à la disposition du public et peuvent être consultées en ligne sur le site officiel de la Direction des pêches et de l'aquaculture : www.pescas.st.

LISTE DES APPENDICES ET DES PIÈCES JOINTES

Barbados Fisheries Division

November 15th, 2026

Chair,
Conservation and Management Measures Compliance Committee
International Commission for the Conservation of Atlantic Tunas
Corazón de María, 8. 28002
Madrid, SPAIN

Dear Mr. Campbell:

Re: Barbados' Responses to Compliance Issues

Hoping that this correspondence finds you well. First, I apologize for this very late response to your Letter on Compliance issues, dated 4 September 2026, and indeed by extension, the delays in meeting ICCAT reporting obligations for this year.

This has been a particularly challenging year for the Barbados Fisheries Division. As you may be aware, Dr. Shelly-Ann Cox, Barbados Chief Fisheries Officer and National Head Delegate to ICCAT suddenly passed away on Saturday June 13th, 2026. As you would appreciate, this tragic event generated emotional, phycological and organizational ripple effects that impacted the normal functioning of the Barbados Fisheries Division. In addition, a number of senior officers had recently retired and during this period were either not yet replaced, or the on-boarding process of new staff was not completed during this period. As such the reduced existing staff had to share the workload, which further negatively impacted on some of the functioning of the Division.

Furthermore, as reported in a number of the reports submitted to ICCAT, including the attached "2026 updates to the 2025-2030 ICCAT action Plan for Barbados", the Division is in the process of centralizing the increased volume of fisheries data now being collected through its expanded data collection program in a novel customized digital Fisheries Information System. This new system was still undergoing the necessary processes of testing and required modifications during this period. In this context, some challenges were experienced in the extraction and collation of some of the data at the finer level of detail required for ICCAT reporting. Although these problems were eventually resolved, these issues significantly delayed the necessary reporting of these fisheries statistics. In concert with the time-constraints resulting from the increased responsibilities and workload burdens on senior staff, the delay in access to these fundamental statistics had a domino effect in delaying other reporting obligations that were based on these fundamental statistics.

Again with my apologies for the very late submission, please find attached the responses in the form of the response template and the "2026 updates to the 2025-2030 ICCAT action Plan for Barbados" to the specific Compliance issues raised in your letter dated 4 September 2026,.

Should you require any further information please do not hesitate to contact me via e-mail: Christopher.Parker@Barbados.gov.bb or Tel: 1- (246) 535-5807.

Please accept assurances of my highest consideration.

Yours sincerely,



……

Christopher Parker

Chief Fisheries Officer (actg.)

Transformative, Inclusive, Sustainable
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Email: Fisheries.Division@barbados.gov.bb | Tel: (246) 535-5800 | Website: https://fisheries.gov.bb

INTERNATIONAL COMMISSION FOR THE CONSERVATION OF ATLANTIC TUNAS

COMMISSION INTERNATIONALE POUR LA CONSERVATION DES THONIDES DE L'ATLANTIQUE

ICCAT CICTA CICAA

COMISION INTERNACIONAL PARA LA CONSERVACION DEL ATUN ATLANTICO

COMPLIANCE LETTER RESPONSE TEMPLATE

2025 COMMISSION MEETING			
CPC: BARBADOS			
AREA OF DEFICIENCY	**SPECIFIC ELEMENTS**	**REMEDIAL ACTION TAKEN***	**DATE MISSING/REQUESTED DATA & INFORMATION WAS SENT** *(if applicable)*
CATEGORY A			
Compliance Tables	Rec. 19-05: Overharvest >5 years BUM (2024 balance: -24.93 t) WHM (2024 balance: -17.88 t).	Barbados catches of BUM and WHM have been kept within the respective allocated catch limit/quotas from 2022 to present for BUM and from 2021 for WHM. As such recurrent overharvest is based on previously accrued catch overages. Based on the provisional provisions included in REC: 25-06 and the USA's clarification and explanation that the 25% penalty should apply only to excess catches of the second consecutive year and not to the entire negative balance presented at the Panel 4 intersessional meeting, 7-8 July 2026, recalculated overages are significantly lower for 2024 *viz*. BUM (2024 balance: -0.59 t) WHM (2024 balance: -4.58 t). The outcome of this year's discussions on Rec. 19-05 will have a significant impact on mechanisms to support ongoing reductions in overages and, consequently, the clarification of a feasible overage payback plan. In this context, Barbados and Belize have co-sponsored a proposal (PA4-808) for increased catch allocations, among other things, with the same goals and justifications as the proposals submitted at the 2025 Commission meeting. Nevertheless, Barbados will attempt to constrain the catch rates of BUM and WHM through the following methods that will be supported in law through the subsidiary Sustainable Fisheries Management and Development Regulations to the Sustainable Fisheries Management and Development Act, 2025 (SFMDA, 2025): (a) longlines may not be deployed, set or used with specialized fishing tackle; specific bait; or fishing technology, to target billfish (b) only circle hooks of a size greater than 16/0, and not offset; or 18/0, with an offset no greater than 10 degrees are to be used on longlines. In October 2025, the Fisheries Division conducted a gear-trial pilot study with local longliners and crew in cooperation with the REBYC III CLME+ Project and the National Research Council (CNR) of Rome, Italy, to compare the post-capture condition and catch performance of fish taken on large circle hooks and J hooks. The results of the trials were promising, with the C16 hooks, in particular, consistently outperforming J hooks on the CPUE of target species (tunas)	

		with a larger percentage of fish alive at haul-back. The Barbados Fisheries Division is continuing to conduct outreach programmes with fishers to promote the use of large circle hooks instead of J hooks, supported by the positive results of the aforementioned sea trials.	
Capacity, size, gear, time, area restrictions			
CATEGORY B			
Annual Report			
Statistical Data	No ST09 form sent (Rec. 16-14, national scientific observer programme).	The Shellcatch EMS system is being designed to meet ICCAT standards and Barbados will duly submit its application to the SCRS for approval for the use of this EMS program as the basis of its domestic observer program and if approved, reporting for much of the longline fleet should be consistently available from 2027 in compliance with the requirements of Rec. 16-14. However some data collected in the interim period, once verified for accuracy, will also be reported.	
Other Reports			
CATEGORY C			
MCS-Species Related			
MCS General	Rec. 16-14 (Paras 4 and 10): No information on the domestic observer programme in place was submitted through ST09. Some information in the Annual Report (under requirement S:GEN11 of *Part 1, Section 3 of the Annual Report ("Online Reporting") in IOMS* or in the Annual Report Word file under *Section 1.2 Research and statistics.*	A human-based observer program has not been implemented in Barbados. The Sustainable Fisheries Management and Development Act (2025) provides the legal basis for establishment of a fisheries observer program managed by the Chief Fisheries Officer. The vast majority of the Barbados longline fleet are less than 15 M LOA with cramped deck layouts and limited space, which precludes the safe deployment of human observers. As such the option for using an EMS-based observer program, as provided for by REC. 16-14 specifically paragraphs 4 (b), has necessarily been chosen. In this context, the Barbados Fisheries Division has been working with Shellcatch, an integrated fisheries technology platform that provides AI-powered electronic monitoring (EM), digital logbooks, and traceability solutions to develop the national fisheries observer program. At present all longliners in the Barbados fleet have been outfitted with VMS and an EMS program was started in Barbados with the assistance of the Strategies, technologies, and social solutions to manage bycatch in tropical Large Marine Ecosystem Fisheries (REBYC-III CLME+) project. Under this project by the end of 2025, 8 Shellcatch cameras had been installed on 7 longliner vessels as part of the pilot project. During this initial phase, a number of challenges were encountered that necessitated refurbishment of the devices to ensure that they were tailored for cogent EMS-based observer coverage of the local fleet in keeping with the standards required by ICCAT. To date, 135 Vessel Monitoring Systems (VMS) devices have been installed across the	

		fleet including on all active longliners. Installation of VMS on sport fishing vessels began at the end of August 2026, with 24 (satellite or cellular) devices being installed to date. Ten (10) of the Shellcatch cameras are either installed or will be installed shortly, and an additional 37 cameras will be supplied by the end of 2026 through the Barbados Coastal Fisheries Resilience (BCFR) project implemented by the United Nations Development Programme (UNDP) with funding from the Government of Japan. In addition 100 Starlink devices will be supplied under the BCFR project. Additionally, the AI imbedded into the EMS system is still being trained to collect the data and information required for an observer program such as real-time species identification and measurement relevant to Barbados and ICCAT. It is planned to on-board a dedicated EMS reviewer/Analyst to the staff of the Fisheries Division. The total 47 Shellcatch cameras as part of the EMS-based observer program will be installed on longline vessels with data being collected on a consistent basis by mid-2027. Once the appropriate testing is completed, Barbados will submit its application to the SCRS for approval for its EMS program as the basis of its domestic observer program by early 2027. The Shellcatch EMS system is being designed to meet ICCAT standards and Barbados will duly submit its application to the SCRS for approval for the use of this EMS program as the basis of its domestic observer program and if approved, reporting for much of the longline fleet should be consistently available from 2027 in compliance with the requirements of Rec. 16-14. However some data collected in the interim period, once verified for accuracy, will also be reported.	
Port Controls			
Vessel Controls			
OTHER	Action plan received late *(2025-11-10)*.	Due to unforeseen challenges explained in the cover letter to the Chair, this year's updates to the Action plan were also submitted late. All efforts will be made to submit required updated action plans within the prescribed deadline in the future.	

***** Relevant remedial actions should be applied broadly, to include actions taken or planned to address the matter identified by the COC and may include actions initiated by the CPC prior to COC raising the matter. Actions could include, inter alia, changes to applicable laws and regulations, policies, organizational structures, and enforcement priorities, as strengthening institutions such as through increased funding and seeking/participating in capacity building and technical assistance.

INTERNATIONAL COMMISSION FOR THE CONSERVATION OF ATLANTIC TUNAS

COMMISSION INTERNATIONALE POUR LA CONSERVATION DES THONIDES DE L'ATLANTIQUE

COMISION INTERNACIONAL PARA LA CONSERVACION DEL ATUN ATLANTICO

ACTION PLAN RESPONSE TEMPLATE
2025 COMMISSION MEETING

CPC: Barbados

Date of submission or revision: [15/11/2026]

DEFICIENCES TO BE ADDRESSED
(1) Rec. 18-07 / Rec. 19-05: Recurrent overharvest of BUM (2023: -54.62 t.) and WHM (2023: -6.08 t) (2) Rec. 16-14: Implementation of Scientific Observer Programme unclear. Observer coverage <5%

SUMMARY INTRODUCTION

The fishing industry has always played an important role in Barbados' food security, social progress, and economic growth. However, the sector faces a number of significant challenges including, starting in 2011, annual mass influxes of Sargassum into the fishing range of the local fishing fleet, which have led to catastrophic declines in catches the island's keystone species flyingfish (mainly *Hirundicthys affinis*) and common dolphinfish (*Coryphaena hippurus*). As a result, catches of highly migratory pelagic species, including retained by-catch species such as billfishes, taken with longline gear, have become even more important in supplementing the island's reduced supply of fresh fish and buttressing the financial viability of the local fishing industry value chain.

Barbados promotes the highest standards for the prudent sustainable management and development of all fisheries. In this context, the island is party to a number of Multilateral Environmental Agreements (MEAs) relevant to sustainable fisheries management and development, including ICCAT. The Sustainable Fisheries Management and Development Act, 2025 (SFMDA (2025) and the sister Sustainable Fisheries Management and Development (Seafood Markets and Business) Act, 2025 came into force on May 12th, 2025. Along with subsidiary regulations, this legislative framework will effectuate comprehensive regulation of the harvest and post-harvest sectors in compliance with recognized international standards and a wide range of ICCAT management measures. However, it must be noted that management measures must be framed such that the special conditions of Small Island Developing States, including Barbados, are fully recognized and incorporated to facilitate the level of compliance desired by all parties.

It is within these guidelines that the following Action plan for Barbados for the period (2025 to 2030) was developed. This document focuses on providing updated information to the plan submitted in 2025 relevant to the continuing compliance issues of concern noted in the 2026 letter from the Compliance Chair.

ACTION ITEMS

- Implementation of the Sustainable Fisheries Management and Development Act, 2025 (SFMDA, 2025) and the Sustainable Fisheries Management and Development (Seafood Markets and Business) Act, 2025 came into force on May 12th, 2025.
- Bringing into legal force the subsidiary Sustainable Fisheries Management and Development Regulations.
- Completion of a comprehensive Ecosystem Approach to Fisheries Management (EAFM) Plan for Large Pelagics.
- Development of communication and public awareness strategies and plans to promote wide industry and public support and compliance with the regulatory framework.
- Extensive and comprehensive stakeholder engagement to advise of and promote compliance with the legislation. This includes, empowerment of fisher-folk organizations and cooperatives to support stakeholder engagement and uptake of new regulations.
- Undertake necessary restructuring and expansion of the human and technical capacity of the Fisheries Division, including training, required for effecting the Monitoring, Control and Surveillance requirements that will accompany the expanded regulatory framework.
- Continuing improvements of the data collection framework through *inter alia*
  - the installation of VMS for the whole fishing fleet;
  - AI monitoring of the catches allowing for species identification and estimation of catch weights utilizing Electronic Monitoring Systems (EMS) and Smart Scales technology at key landing sites;
  - Centralization of data in a bespoke Fisheries Information System (FIS Ultra) to support evidence-based decision making and the implementation of data driven solutions.
- Implement an ICCAT-approved comprehensive EMS observer program.

PLAN OF IMPLEMENTATION

(1) Rec. 18-07 / Rec. 19-05: Recurrent overharvest of BUM (2024 balance: -24.93 t) WHM (2024 balance: -17.88 t)

- Barbados catches of BUM and WHM have been kept within the respective allocated catch limit/quotas from 2022 to present for BUM and from 2021 for WHM. Therefore, the recurrent overharvest is based on previously accrued catch overages.
- At the 2025 Commission meeting Barbados co-sponsored draft Recommendations to amend Rec. 19-05, seeking equitable upward adjustments to annual catch allocations/quota that are more in line with meeting the social and economic needs of Barbados and these other Caribbean SIDS in relation to marlins, while also taking into account the real practical constraints of targeted reduction in the catches of marlins when fishing in waters within the fishing range of Barbados, where these species are abundant and, thus facilitating compliance with relevant ICCAT recommendations. In this context, the proposed recommendations also sought rationalization and relief of the treatment of marlin catch overages including development of a viable timely payback scheme.
- Although the draft proposal to amend to amend Rec. 19-05 co-sponsored by Barbados at the 2025 Commission meeting was not adopted, another proposal seeking the granting of provisional mitigating measures was adopted, as REC 25-06 "Recommendation by ICCAT to grant provisional measures to developing coastal ICCAT CPCs for extenuating circumstances resulting from Recommendation 19-05". In the case of Barbados, this allowed for a provisional increase of the annual BUM catch limit from 10t to 20t for 2025 and 2026 and exemption from the 125% overage penalty for 2024 and 2025.
- Furthermore, at the on-line intersessional meeting of Panel 4, 7 and 8 July 2026, the USA presented a Discussion paper on the excess harvest penalty calculation in paragraph 3b of Recommendation by ICCAT to establish rebuilding programs for blue marlin and white marlin/roundscale spearfish (Rec. 19-05)" clarifying and explaining that the 25% penalty should apply only to excess catches of the second consecutive year and not to the entire negative balance. As recorded in the report of the meeting (presented at PA4-803), the Panel supported the approach outlined in the document and agreed CPCs should work with the Secretariat to accurately recalculate overages for review by Panel 4 and the Compliance Committee at the 2026 Annual Meeting.
- Based on the calculation criteria as per Rec. 25-06 and the clarification from the USA, documented in the report of the Panel 4 intersessional meeting (PA4-803), the recalculated catch overages for 2024 are significantly lower i.e. BUM (2024 balance: -0.59 t) WHM (2024 balance: -4.58 t).
- Mechanisms to facilitate continued reductions in overages, and as such elucidation of a timely payback plan, will be largely predicated on the outcome of this year's deliberations on Rec. 19-05. To this end, Barbados and Belize, have co-sponsored a proposal PA4-808) for, *inter alia,* increased catch allocations with the same objectives based on the same rationales as the first proposal submitted in 2025.
- Nevertheless, mechanisms are already in train in Barbados to curb the catch rates of BUM and WHM through the following methods supported in law through the subsidiary Sustainable Fisheries Management and Development Regulations to the Sustainable Fisheries Management and Development Act, 2025 (SFMDA, 2025):

  (a) longlines may not be deployed, set or used with specialized fishing tackle; specific bait; or fishing technology, to target billfish

  (b) only circle hooks of a size greater than 16/0, and not offset; or 18/0, with an offset no greater than 10 degrees are to be used on longlines
- The Fisheries Division in collaboration with the REBYC III CLME+ Project and the National Research Council (CNR) of Rome, Italy, carried out a gear-trial pilot study with local longliners and crew to compare catch performance and post-capture condition of fish taken on large circle hooks and J hooks. The results of the trial were promising with the large circle hooks tested having substantially higher catch rates of target species than traditional J hooks in addition to a higher proportion of fish alive at haul-back.
- From early 2026 the Fisheries Division has been engaged in outreach programmes with fishers to promote and embrace the use of large circle hooks instead of J hooks, supported with the positive results on catches of target species of the aforementioned fishing trials. See: https://www.fisheries.gov.bb/save-the-date-transformative-change-fish-smart-hook-right/
- In addition the REBYC III CLME+ Project funds a hook buy-back and trade-in scheme allowing local fishers to exchange their old J-hooks for compliant circle hooks at no upfront replacement cost. While the Fisheries Division has been working with partnering agencies and institutions to offer circle hooks at discounted rates, improving affordability and helping to secure a more reliable local supply chain for compliant gear.
- Comparison of the catch rates of marlins on circle hooks, which are mandated in the pending regulations, will be monitored to assess the effectiveness of this method at reducing marlin catches.

(2) Rec. 16-14: Implementation of Scientific Observer Programme unclear. Observer coverage <5%

- A human-observer program has not been implemented in Barbados. PART X of the SFMDA (2025) articulates that the Chief Fisheries Officer plans and manages an observer program. The duties and responsibilities of an observer, and the owner of the vessel or facility in which a fisheries observer is placed, are also articulated.
- The SFMDA regulations expands on the observer programs importantly clarifying that both commercial and sport fishing vessels are subject to observer programs including Electronic Monitoring System (EMS) based observer programs. In this context installation of any on-board electronic surveillance equipment deemed necessary to allow the unimpeded observation of all on board fishing and related activities. This, as part of an Electronic Monitoring System (EMS) based observer program. As the vast majority of the Barbados longline fleet is comprised of vessels

less than 15 M LOA, paragraph 4 (b) of REC. 16-14 applies and in this context, paragraph 13 that allows for the use of EMS as a viable substitute for the placement of on-board human observers on Barbadian longliners also applies.

- In this context, the Barbados Fisheries Division has been working with Shellcatch, an integrated fisheries technology platform that provides AI-powered electronic monitoring (EM), digital logbooks, and traceability solutions to develop and the national fisheries observer program.
- At present all longliners in the Barbados fleet have been outfitted with VMS.
- An EMS program was started in Barbados with the assistance of the Strategies, technologies, and social solutions to manage bycatch in tropical Large Marine Ecosystem Fisheries (REBYC-III CLME+) project. Under this project by the end of 2025, 8 Shellcatch cameras had been installed on 7 longliner vessels as part of the pilot project. As for any pilot project some challenges were encountered and had to be addressed. This resulted in the refurbishment of the devices to ensure that they meet the standards for effective EMS-based observer coverage required by ICCAT.
- At present 10 of the Shellcatch cameras are either installed or will be installed shortly and an additional 37 cameras will be supplied by the end of 2026 through the Barbados Coastal Fisheries Resilience (BCFR) project implemented by the United Nations Development Programme (UNDP) with funding from the Government of Japan.
- In addition 100 Starlink devices will be supplied under the BCFR project.
- Currently the AI imbedded into the EMS system is still being trained to collect the data and information required for an observer program, such as real-time species identification and measurement, relevant to Barbados and ICCAT.
- A dedicated EMS reviewer/Analyst will be added to the staff of the Fisheries Division.
- Although the Shellcatch system is being designed to meet ICCAT standards, Barbados will duly submit its application to the SCRS for approval for the use of this EMS program as the basis of its domestic observer program and if approved, reporting for much of the longline fleet should be consistently available from 2027 in compliance with the requirements of Rec. 16-14. However some data collected in the interim period will be reported.

Responsible parties: All fisheries stakeholders *inter alia*: All persons and entities directly involved in the fisheries and post-harvest sectors, technical staff of the Fisheries Division and other agencies involved in management of marine resources and Fisheries Monitoring, Control, Surveillance, and Enforcement MCSE; Ministers with responsibility for fisheries and legal affairs.

Resource allocation: Recurrent Programme Budgets of the respective Government agencies; relevant project funding and private funding as appropriate.

TIMELINE / INCREMENTAL BENCHMARKS FOR COMPLETION

- The Sustainable Fisheries Management and Development Act, 2025 (SFMDA, 2025) and the sister Sustainable Fisheries Management and Development (Seafood Markets and Business) Act, 2025 came into force on May 12th, 2025.
- The subsidiary Sustainable Fisheries Management and Development Regulations to the (SFMDA, 2025) are currently undergoing the final processes for commencement and should be in effect early 2027.
- The EAFM Plan for Large Pelagics will be completed by early 2027.
- Promotion of the pending regulations to the fishing industry are underway and voluntary compliance is already occurring including the replacement of J hooks with circle hooks.
- The ongoing program for the installation of VMS units on local fishing vessels, as mandated by the SFMDA (2025), is already at a very advanced stage with 135 Vessel Monitoring Systems (VMS) devices installed across the fleet including all active longliners. Installation of VMS on sport fishing vessels began at the end of August 2026, with 24 (satellite or cellular) devices being installed to date.
- A total of 47 Shellcatch cameras as part of the EMS-based observer program will be installed on longline vessels with data being collected on a consistent basis by mid-2027.
- The Shellcatch system is being designed to meet ICCAT standards and Barbados will duly submit its application to the SCRS for approval for the use of this EMS program as the basis of its domestic observer program and if approved, reporting for much of the longline fleet should be consistently available from 2027 in compliance with the requirements of Rec. 16-14. However some data collected in the interim period, once verified for accuracy, will also be reported.

EXPECTED IMPROVEMENTS / OUTCOMES IN THE NEXT YEAR

- The new comprehensive fit-for-purpose legislative framework to manage the contemporary fisheries sector in legal force promoting improved compliance with ICCAT recommendations that are fair and equitable taking into account the special needs of Barbados as a Small Island Developing State.
- Sound stakeholder buy-in and compliance with the relevant legislation.
- Political will to support the implementation of the new regulations.
- ICCAT-approved EMS-based observer program in full effect.
- Improved digital-based data collection.

DIFFICULTIES ENCOUNTERED / ALTERNATIVE ACTIONS TAKEN

Human and financial resources are limited for sustaining initiatives that promote compliance. To remedy this situation, the division has been exploring innovative financing including monetizing datasets. Building out a framework to encourage Corporate Social Responsibility models from private sector partners can fund research and development initiatives.

CONCLUDING SUMMARY

A multi-prong action plan has been outlined to promote the sustainable management and development of the fisheries sector of Barbados, has been outlined that includes effecting compliance with relevant ICCAT conservation and management measures, and reporting obligations. The plan is based on:

- A comprehensive, fit for purpose legislative framework comprised of the Sustainable Fisheries Management and Development Act, 2025 and the Sustainable Fisheries Management and Development (Seafood Markets and Business) Act, 2025, both of which came into force on May 12th, 2025, and the subsidiary Sustainable Fisheries Management and Development Regulations currently undergoing the final processes for commencement.
- Implementation of a comprehensive EAFM Plan for Large Pelagics;
- Significant improvements in data collection framework including expansion of traditional coverage of activities at landings sites including the introduction of smartscales at major sites, installation of VMS on all fishing vessels and AI assisted monitoring of the catches allowing for species identification and estimation of catch weights etc. with Electronic Monitoring Systems (EMS) installed initially on longliners. Culminating in the centralization of data in a bespoke Fisheries Information System (FIS Ultra) to support evidence-based decision making and the implementation of data driven solutions;
- Implementation of an ICCAT-approved EMS-based observer programme that will effectively cover much more than the minimum 5% observer coverage;
- Cogent stakeholder support for, and compliance with, relevant legislation sustained through empowerment of fisherfolk and fisherfolk organisations supported by effective communication and public awareness strategies.

LIST OF APPENDICES AND ATTACHMENTS

- Sustainable Fisheries Management and Development Act, 2025 (SFMDA, 2025) https://www.fisheries.gov.bb/content/files/2025/05/Sustainable-Fisheries-Management-and-Development-Act-2025-1.pdf
- Sustainable Fisheries Management and Development (Seafood Markets and Business) Act, 2025 https://www.fisheries.gov.bb/content/files/2025/05/Sustainable-Fisheries-Management-and-Development--Seafood-Markets-and-Businesses--Act-2025-1.pdf