

RESPONSES FROM CONTRACTING PARTIES TO
COC CHAIR' LETTERS REGARDING COMPLIANCE

RECEIVED BEFORE 12 OCTOBER 2018

Annex 1 of document **COC-309** contains the letters sent by the COC Chair and having received a reply by the CPC before the deadline. **Annex 2** contains the letters sent by the Chair being without reply by 12 October 2018. Replies received after the deadline will be presented as **Addendum** to COC-309.

<i>CP</i>	<i>Letter of Chair sent to</i>	<i>Reply to letter reporting deficiencies</i>	<i>Reply to letter of identification or prohibition</i>	<i>Has reported actions taken Yes/No</i>	<i>Has reported other actions to be taken</i>	<i>Date of reply</i>
Albania	X	Yes		Yes	Yes	09/10/2018
Algeria						
Angola	X	No				--
Barbados	X	Yes		Yes		10/10/2018
Belize						
Brazil	X	No				--
Cabo Verde	X	Yes		Yes		10/09/2018
Canada						
China PR	X	Yes		Yes		30/09/2018
Côte d'Ivoire	X	No				--
Curacao	X	Yes		Yes		10/10/2018
Egypt	X	Yes		Yes		10/10/2018
El Salvador	X	Yes		Yes		09/10/2018
European Union						
France SPM						
Gabon	X	Yes		Yes		10/09/2018
Ghana	X	Yes		Yes		08/10/2018
Grenada						
Guatemala						
Guinea Ecuatorial	X	No				--
Guinea Bissau	X	No				--
Guinea Rep	X	No				--
Honduras	X	No				--
Iceland						
Japan						
Korea						
Liberia	X	Yes		Yes		09/10/2018
Libya	X	Yes		Yes		10/10/2018
Mauritania	X	No				-
Mexico	X	Yes		Yes		29/09/2018
Morocco						
Namibia						
Nicaragua	X	Yes		No		01/10/2018
Nigeria	X	No				-
Norway						
Panama	X	No				--
Philippines	X	No				-
Russia	X	Yes		Yes		20/09/2018

<i>CP</i>	<i>Letter of Chair sent to</i>	<i>Reply to letter reporting deficiencies</i>	<i>Reply to letter of identification or prohibition</i>	<i>Has reported actions taken Yes/No</i>	<i>Has reported other actions to be taken</i>	<i>Date of reply</i>
Sao Tomé e Príncipe	X	No				--
Senegal	X	Yes		Yes		18/09/2018
Sierra Leone	X		Yes	Yes		17/08/2018
South Africa						
St Vincent & Grenadines	X	Yes		Yes		10/10/2018
Syria	X	Yes		Yes		24/09/2018
Trinidad & Tobago	X	Yes		Yes		05/10/2018
Tunisia	X	Yes		Yes		08/10/2018
Turkey						
UK-OT	X	Yes		Yes		10/10/2018
United States						
Uruguay						
Vanuatu	X	No				--
Venezuela	X	No				--

RESPONSES FROM COOPERATING NON-CONTRACTING PARTIES, ENTITIES OR FISHING ENTITIES TO LETTERS OF CONCERN

<i>Flag</i>	<i>Letter regarding reporting deficiencies received by</i>	<i>Has reported actions taken Yes/No</i>	<i>Has reported other actions to be taken</i>	<i>Date of reply</i>
Bolivia				
Chinese Taipei				
Costa Rica				
Guyana	X	Yes		10/10/2018
Suriname				



REPUBLIKA E SHQIPËRISË

MINISTRY OF AGRICULTURE AND RURAL DEVELOPMENT

Tirana, 9 October 2018

Mr. Derek Campbell
 Compliance Committee Chair
 ICCAT Secretariat
 Corazon de Maria, 8-28002 Madrid, Spain

SUBJECT: RESPONSE TO LETTER NO. 3236/2018 REGARDING REPORTING DEFICIENCIES IN 2017

Dear Mr Derek Campbell,

On behalf of the CPC Albania, I am writing to response you about the letters regarding reporting deficiencies in 2017 and not only.

First of all, I do apologise for the lack of correctness and failure to reply by CPC Albania to the COC Chair's letter regarding reporting deficiencies in 2016 (No. 2464, date 17/04/2017), as well as in 2014 and 2015.

Regarding the reporting deficiencies in 2017, raised in the letter No. 3236/2018, date 17/05/2018, please allow me to indicate the progress made by Albania, addressing all the issues mentioned in the above letter:

- In the Albania's Annual Report there are no more explanations responded "N/A or Not applicable). In every fields where Albania respond "Not applicable or N/A" you will find the proper explanation.
- The Task I fishing fleet characteristics (ST01 form) and nominal catches (ST02 form) are submitted on 28/09/2018, and are resubmitted on 04/10/2018, including all missing data of previous years (2014 – 2017).
- The Task II catch & effort data is submitted on 28/09/2018, and is resubmitted on 04/10/2018, including all missing data of previous years (2014 – 2017).
- The shark check sheet, required under Rec. 16 – 13, is submitted on 01/10/2018.
- In Annual Report fields BYC 8001 to 8003, we provide specific explanation concerning domestic legal acts and guides to implement turtle by-catch mitigation measures as well as the other measures to mitigate by-catch and discards.

Again, I do apologize the delay of 3 days in reporting statistical data and submitting Annual Report, due to our willingness to provide all missing data (2014 – 2017).

Thanks to the generous help and readiness of Secretariat and Compliance Committee, CPC Albania overcame difficulties regarding the reporting requirements to ICCAT. Also, we have had a close collaboration and great support from other CPCs (USA, Turkey). Next year and onwards, we will start long term cooperation with CPC Italy in the frame of an EU project. One of the components of the project is the fulfilments reporting requirements to the RMFO (ICCAT and GFCM).

We are working closely with FAO to implement the by-catch monitoring program through the observers on board of fishing vessels (bottom & pelagic trawlers and purse seiners) and to obtain representative data on the discard component of total by-catch, as well as information on the incidental catch of vulnerable species.

In thanking you for your support to these important matters, let me express to you the assurance of my highest consideration.

Arian Palluqi

Head of Delegation

Albania

Dear Mr. Campbell

I refer to your letter of May 17th 2018 in which a number of compliance issues were included. The issues raised in the letter are all forms of reporting deficiencies that are acknowledged.

In this regard, it should be noted that the number, detail and frequency of ICCAT reporting obligations has increased appreciably over the last few years and this has resulted in a concomitantly increasing pressure on the already limited resources of the Fisheries Division, the agency charged with these reporting obligations for Barbados.

The Fisheries Division makes every attempt to satisfy all reporting obligations in relation to all local fisheries and to all relevant agencies including ICCAT in a timely manner, although regrettable lapses can occur.

The compliance issues raised are addressed as follows:

- 1) Part II of the 2018 Annual Report was submitted via email in the evening of October 1st, 2018. However, because of the time-zone difference between Barbados and Spain it has been reported as "a late submission".
- 2) The 2018 North Swordfish plan was submitted along with the Part II Annual Report
- 3) The quarterly BET catches for the whole of 2017 and for the first two quarters of 2018 were submitted via e-mail on October 3rd, 2018.
- 4) The shark measures implementation check sheet is now under review but should be submitted before October 12th, 2018.

I hope by this letter the concerns raised by the Compliance Committee are addressed. Barbados will continue its efforts to comply with the reporting obligations of ICCAT, and in a timely manner.

Please accept the assurances of my highest consideration.

Stephen Willoughby
CHIEF FISHERIES OFFICER

MINISTRY OF MARITIME ECONOMY

GENERAL DIRECTORATE OF MARINE RESOURCES

Mindelo, S Vicente, September 2018

DGRM/Ref. 47/DGRM/2018

To
ICCAT Secretariat – Madrid, Spain
ATT: MR. DEREK CAMPBELL
COMPLIANCE COMMITTEE CHAIR

SUBJECT: RESPONSE OF CABO VERDE TO THE LETTER FROM ICCAT REGARDING REPORTING DEFICIENCIES IN 2017

THE MINISTRY OF MARITIME ECONOMY OF CABO VERDE, through the General Directorate of Marine Resources, expresses its appreciation in relation to your letter with reference No. 3236/2018 of 17/5/18 on reporting deficiencies by Cabo Verde in 2017.

We duly note the deficiencies. Without wishing to avoid our responsibilities, 2017 was a very difficult year, given the substitution of the Head Delegate, and the late designation of the new focal point for research and statistics.

Despite the difficulties, in 2018, we managed to submit the data from 2016, in particular Task I, Task II, size frequency and the compliance tables. We are finalizing the 2017 annual report so that it can be submitted by the established deadline.

The lack of computer tool, in particular specific software to support data processing, and the shortage of training severely limit Cabo Verde's response capacity regarding producing and timely submission of data. In this respect, we would like to receive financial support from ICCAT to strengthen our response capacities in relation to the current statistics and data processing system (statistical and biological data) for tuna caught in Cabo Verde.

Before concluding, we would like express our firm commitment to working with determination in order to overcome deficiencies and limitations regarding data submissions to the ICCAT Secretariat.

We are willing to work with the ICCAT Secretariat, especially with the department of research and statistics (SCRS), to update and correct where necessary the information submitted by Cabo Verde.

Yours sincerely,

General Director
(signed and sealed)

Carlos Alberto Évora Pocha
General Director of Marine Economy

30 September 2018

Subject: Reply letter of China regarding compliance issues in 2017

Dear Mr. Chair,

This is to reply your letter regarding compliance issues identified in 2017 Annual Meeting as follows.

First, regarding the issue of no list of designated ports that may be entered by foreign fishing vessels or contact points were submitted, nor is there any indication in China's Annual Report of a specific prohibition on entry of foreign fishing vessels.

In this regard, I wish to advise that in China, the port inspection involved in multi-sector's collaboration and coordination which at least comprise of agriculture, transportation and customs departments. So currently we are now in the process of making great efforts to coordinate those sectors. For example, this year we contact very frequently with our colleagues from Ministry of transportation and shared our concern with them on the foreign vessel port inspection. We both agreed to cooperate closely to work together in relation to foreign fishing vessel port inspection on specific cases. Actually, according to our statistics, there were no ICCAT catching vessels come to Chinese port directly all the time, but indeed very few ICCAT carrier vessels landed its fish product which is caught and transshipped by China-flagged fishing vessels to our port, up till now, no any IUU fishing activities were found.

In addition, China have already finished the feasibility study of joining the FAO Port State Measures Agreement and right now is going through our complicated domestic procedure and may need to adapt our domestic legislation to conform to the Agreement.

Moreover, although we did not implement the 5% minimum port inspection on foreign fishing vessels entering into Chinese port, we indeed monitor the importation and landings of the fish product coming from ICCAT waters through many other ways. For example, all the importation of BET , SWO and BFT must be accompanied with a custom clearance certification which when the importer apply for such certificate, they need to show us such materials as ICCAT transshipment declaration, statistical document, certificate of origin etc. Besides, we will coordinate temporarily with relevant domestic sectors to conduct a port inspection to foreign fishing vessels upon the request of flag state on a case by case basis.

Second, regarding the issue of no submission of list of BFT designated ports.

Please note that Chinese BFT fishing vessels usually transship or land its BFT at the ICCAT designated foreign port and never come back its home port for transshipment or landing from the outset, nor any foreign BFT fishing vessels directly visit Chinese port for transshipment or/and landing for those years. Therefore, it is our understanding that there is no necessary to submit such list of BFT designated ports.

We would like to reiterate our commitment to comply with the ICCT recommendations to our best and continue our efforts to coordinate our domestic department to finally fulfill the obligations of ICCAT recommendation.

I hope the above clarification could explain the situation and the letter of concern could be lifted.

Regards.

ZHAO Liling
Commissioner of China to ICCAT
Division of Deep Sea Fishing
Bureau of Fisheries, Ministry of Agriculture and rural affairs, China

Topic; Answer to the letter regarding reporting deficiencies.

Dear Mr. Campbell,

With reference to the letter mentioned above I hereby would like to inform you as follows.

With regard to the deficiencies I would like to inform you as follows:

- A. Collection Program of Sailfish: We apologize because we have not started yet in 2017 with this program, that's why we have not reported about this program:
- B. 5 % scientific observer coverage in marlin tournament coverage: With regard to this point I want to refer to the letter attached of the Yacht Club Curacao in which they have informed us that it is a tag and release tournament and in regard herewith there is zero landing. So we have in 2017 complied with the observer coverage because the landing is nihil;
- C. Results of scientific programs for billfish: There are no results of this program as this was not started in 2017 but in 2018 we have approached the University of Wageningen for a proposal to set up a collection program for artisanal fisheries;
- D. Collect Data of Sailfish inclusive live and dead discards; estimate mortality for:

Commercial fisheries:

In the last Task 1 data the latest bycatch estimates that we sent (sharks and billfish) we indicate to our observers to monitor that marlins are released alive where possible and, in the case they are dead at the time of capture, they are unloaded in port and represent a source of proteins for the local population. This is the main reason why Curaçao has not implemented a policy of no-retention of dead billfish. Purse seiners catch marlins as bycatch, with most specimens caught dead and retained to be unloaded in port for the local population to use it (faux poisson). Fish is not commercialized but kept on board as these catches contribute to food security in the region.

Furthermore with regard to data of artisanal fisheries in Curacao I want to inform you as follows: Artisanal fisheries in Curaçao can be separated in two sectors, reef fishing for demersal species operating with a fleet of small boats (2-7 m) powered by outboard engines (15-48 hp) and principal gear are hand-lines; while the other sector is pelagic fishing operating with larger boats (7-14 m) with cabin, powered by inboard engines and trolling (hand-line dragged through the water) for pelagic species. As of 2016, the pelagic fishery had 91 vessels; however, crossover between fisheries (reef and pelagic occurs), thus the 91 vessels may be operating within the reef fishery and vice versa. Nonetheless, trolling (used to catch large pelagic species) is mostly done by larger vessels (>7m) with a cabin and an inboard motor.

A Fishery Aggregation Device (FADs) program was introduced by the island government for pelagic fisheries however, there are no reports of its operations and that they are no longer operational. However in recent times a new fishing mode using fish aggregating device commenced to be used, i.e., oil-tankers anchored off the coast waiting to load on oil from the Curaçao refinery, but no information is available on its use. Due the former situation of Venezuela the tankers are not bunkering at Curacao anymore, so this also not operational. The artisanal fisheries don't fall under the monitoring of the Fishery Monitoring Centre but under the responsibility of the Ministry of Health, Nature and Environment.

Curaçao has the basis for data collection but is very limited on trained personnel at the Ministry of Health, Environment and Nature. Thus, capacity building in the fishery collection of data from the large pelagic artisanal fishery could prove beneficial for ICCAT. Therefore, potential investment could be directed at a data collection program on large pelagic species of interest to ICCAT. Initially, the focus would be one of the two main ports where ICCAT species are landed, by training fishery data collectors for large pelagic species (specifically ICCAT species of interest), most specifically in species ID and effort data collection, particularly in the use of oil-tankers as FADs, as well as the design of port sampling schemes for artisanal fisheries.

A new fisheries ordinance has been developed by Curacao in 2015 which comprises a setup of a body of a fisheries authority. This new ordinance has been approved by the Government and has to be treated by the Parliament. The Ministry of Economic Development and the Ministry of Health is now consulting with each other how the part of artisanal fisheries can be further developed. Curaçao fisheries laws that govern now include national and island ordinances and subsidiary legislation, which predate 2010, continue to apply until this new fisheries ordinance of 2015 is approved by the Parliament of Curacao.

Finally I hope to have informed you sufficiently.

Kind regards



Secretary of the Fishery Commission

Dear Mr. Derek

Good day to you ...

Regarding your kind circular # 3271 /2018 with subject of “letter regarding reporting deficiencies in 2017 “

First, I would like to thank you for your motivating words about our reporting improvement, following I would like to response for the concerning points mentioned:

Deficiencies in 2017		Egypt responses – clarifications
1-	Regarding the no explanation of (N/A or not applicable) in our annual report 2017	Please accept our apology, from 2018 annual report, an explanation in N/A or not applicable has been explained
2-	ST01 on fleet characteristics submitted late	It has been submitted within the deadline on Mon 7/31/2017 5:37 PM. Original mail is attached
3-	Shark meager implementation check sheet	Please accept our apology, it was an omission form our side, since Egypt prohibits fishing all fishing all sharks species / also all shark trading Once Egypt notified by your kind mail on 7/11/2017 we have submitted it on 11/11/2017.
4-	Applying rec. 16/14 and the concerning points under BIL 5002; SHK 7004/7006	Egypt already start its domestic observer program in accordance with Rec. 16/14 and are going to develop its scientific side at the same time to enhance the needed observers reporting by assigning a qualified observers on board and in the landing points for collecting the needed information Unfortunately Fisheries Law No. 124/83 still in the process of transposing the minimum standers contained in Rec. 16/14 to the domestic law , and still in its legalization circle Regardless the current economic situation in Egypt which doesn't help to fulfil our obligation efficiently
5-	Applying rec.10/09	With regard to the by-catch sea-turtles we would like to grab your attention to the fact of no any observation or record has been issued to a single case for accidental by-catch of sea-turtle since issuing the domestic law no. 151/2012 and its circulation to the observing and landing points that assigned by GAFRD to observe and report for any by-catch and its instructions how to deal with such any case of sea-turtle or seabird by-catch in accordance with ICCAT rec. 10/09 in addition to the cooperating program between the environment ministry and GAFRD since 2014 lunched a new program under the name of (ATRT) resulting sub-plan with the purpose of observing and reporting any by-catch in order to rescue any

		by-catch of sea-turtle and ensure its survival in accordance with Para no. 1 and 2 ICCAT rec. 10/09
6-	The annual report points SHK 7001 / 7007	<p>As we stated before Egypt has strictly prohibited any catching for all shark species in our domestic law followed up with a specific instructions to all monitoring points and also in the landing zones for watching and report any accidental catch in order to take the appropriate action according to the domestic law</p> <p>Also our national observer program still developing</p>
7-	Regarding swordfish- encouraging Egyptian vessels removing from the ICCAT list	<p>We would like to inform you Egypt has complied direct after the ICCAT meeting in Morocco and removed the authorized fishing vessels to catch MED-SWO since Egypt has no assigned quota</p> <p>With our reservation on our rights to have the correct quota considering our fishing history and large fleet as shown in our statistical information shown in our annual report</p>

Eventually we would like to avail the opportunity to thank all the ICCAT team for your guidance and support us in our seekness to improve our reporting quality throughout your profound knowledge

El Salvador 5 October 2018

Dear Chair,

Allow me to respond to your letter #3236/18 dated 17 May 2018, stating the concerns of the Compliance Committee at its 2017 meeting regarding the compliance of El Salvador's Commission requirements.

As regards to this, I will refer to each of the concerns and provide the following responses:

- **The FAD management plan was submitted late (at the Commission meeting)**

We regret this situation, however, we would like to point out that we are making every effort to present a Plan regarding our purse seiners, in particular, to minimize the ecological impact of these vessels. Action which has been described in detail in the Plan.

Furthermore, please note that there was some internal confusion as we thought that the FAD Management Plan had been sent. However, after reviewing our files, we realised that we had sent our Tropical tunas Management Plan.

- **The shark-sheet, as required by Rec. 16-13, was not submitted**

This requirement, which includes ten recommendations and relates only to sharks, is being sent. We thought it did not apply to El Salvador as it only has purse seine vessels. However, after reviewing the recommendations, we found that some were related to incidental catches of sharks that may occur in the other fisheries of the ICCAT zone.

- **In compliance with paragraphs 7 and 9 of Rec. 12-07, no list of the designated ports where foreign fishing vessels can enter or the contact points was submitted. Furthermore, the Annual Report of El Salvador (GEN_011) does not include any information regarding a specific prohibition of the entry of foreign fishing vessels.**

This year we have provided the CP24-AuthPort form to the Commission including the information relevant to this requirement. Likewise, further explanation is provided in Section 5 of Part II of the Annual Report.

Dear Chair. I hope to have clarified the doubts of the Compliance Committee, I would like to express appreciation for reminding El Salvador of the areas in which it might be failing to comply with the Commission obligations.

Regards,

Gustavo Antonio Portillo Portillo
General Director

Libreville, 5 September

To
Mr. Derek Campbell
Compliance Committee Chair
ICCAT
Madrid

Subject: Letter regarding reporting deficiencies in 2017

Dear Chair,

We acknowledge receipt of your letter with reference 3236/2018 of 17 May 2018 in which the Commission expresses its concern in relation to underreporting of ICCAT requirements, and particularly, the deficiencies noted for Gabon.

With regard to late submission of the Annual Report, mechanisms have been introduced to improve the compilation and processing system of information to be submitted to the Secretariat by the submission deadlines.

Moreover, the control sheet on implementation of sharks measures and the compliance table were completed for 2017 and submitted in time.

It should be noted that information processing procedures were adopted in 2017 to facilitate the update of all data and information to be submitted to the Secretariat for the purposes of compliance with ICCAT requirements.

Yours sincerely,

General Director
(signed and sealed)

Micheline SCHUMMER GNANDJI

RESPONSE BY GHANA ON THE LETTER ON REPORTING ISSUES (NAS WITHOUT EXPLANATION REC.16-11 ON SAILFISH)

Ghana seeks to respond to the action taken against her in 2017 concerning no explanations for not reporting steps taken to conserve the Sailfish species as stipulated in Recommendation 16-11 on the sailfish species.

Recommendation 16-11 stipulates among others the importance of the ICCAT Enhanced Research Programme for Billfish and the need to improve catch data reporting for sailfish; and that management measures are in place to support the conservation of this species in line with ICCA T's Convention objectives.

Ghana regrets the error of not stating the efforts she has been making to conserve the species inhabiting her waters. We have collectively taken steps to conserve all the billfishes inclusive of the Sailfish since 2012 with education and workshops being organized by ISSFIAZTI officials in Ghana codenamed "Skippers workshop". Methods and types of FADs to use and release strategies on endangered species have been demonstrated to the industry. Skippers and crew are well aware of steps to reduce the entangled endangered species including the sailfish. This initiative from ISSF will continue in subsequent years. With the help of Electronic Monitoring Cameras, under the Area Beyond National Jurisdiction (ABNJ) Project, we are also monitoring the capture and release of juvenile sailfish caught from the Tuna purse seiners. Efforts are in line to extend the project to all surface fleets including the Bait boats. Artisanal catches are also monitored closely with catch and effort data reported to the SCRS. Ghana will do her best to report promptly and cooperate with the SCRS and Commission to ensure the conservation of the Sailfish species.

Please accept the assurances of our highest esteem.



Republic of Liberia
NATIONAL FISHERIES AND AQUACULTURE AUTHORITY (NaFAA)

P. O. Box 1384
Bushrod Island, Monrovia, Liberia



Office of the Director General

Email: emma.glassco@liberianfisheries.net / metiehemma@yahoo.com

RL/NaFAA/DG/L-356/'18

October 9, 2018

Mr. Dereck Campbell:

Compliance Committee Chair

International Commission for the Conservation of Atlantic Tunas
Madrid, Spain

October 8, 2018

Dear Mr. Dereck Campbell:

SUBJECT: RESPONSE TO LETTER REGARDING COMPLIANCE ISSUES IN LIBERIA 2017

I write to firstly acknowledge receipt of your letter dated May 17, 2018 with reference number **323/2018** regarding key concerns for Compliance issues from Liberia's 2017 annual report.

Below are efforts made towards addressing the concerns raised:

1. Liberia has since updated its 2017 annual report with explanation regarding "Not Applicable or N/A", **Please find attached Liberia updated report 2017.**
2. Statistics data have been correctly reported as shown in the updated report. Please note that all current Tuna Vessels Licensed by Liberia are **Not** flagged to Liberia, so we cannot present catch data which is a flag states responsibility. However, as the ICCAT species identification training and data program started 2018, Liberia will ensure that size data will be reported from the national canoes for the next annual report 2018.
3. Within the framework of the SFPA's, the designated port for all licensed vessels is the Port of Abidjan; the Port of Dakar; and the Port of Accra. All pre-licensing inspections for the tuna vessels within the EU SFPA and that of the Private SFPA take place in the ports mentioned above.

Dear/ Mr Derek Campbell

ICCAT Compliance Committee Chair

Reference is made to your letter (3236//2018), dated 17th May 2018, regarding Issues highlighted in 2017, CPC-LIBYA had taken note of the contents therein, and has the honner to reply by the following:-

Libya has, over the past years, been passing through a period of instability and this unfortunately does not contribute positively to collation of data and management especially in the small coastal villages where artisanal fishery targets species such as SWO, ALB e SHK; the catches are small and are addressed only to the immediate markets where sale prices are at a very low ebb due to the decreased spending power of the local populations and these fishermen are barely making a decent living.

CPC-LIBYA had presented a fishing fleet for SWO on the 15th January; this fleet was made of vessels of an industrial nature and due to the fact that no quota was allocated to CPC-LIBYA it was decided not to issue any authorisations for fishing SWO and indeed none of these vessels did target this species.

However CPC-LIBYA stands in error in not having sent the SWO Annual Report and Quarterly Reports, we are in the process of re-organising and committed to make our best efforts endeavour to adhere to the reporting requirements and the introduce management mechanisms that can bear results without causing harm to the local fishing community.

Please Accept the assurance of my highest considerations.

Mussab F. B. Alghawel
Coordinator in Charge,
Head of Libyan Iccat team,
CPC-LIBYA.

cc: R. Delgado, Commission Chairman

Mazatlán, Sinaloa, 10 September 2018

DR. CAMILLE JEAN PIERRE MANEL
EXECUTIVE SECRETARY
INTERNATIONAL COMMISSION FOR THE CONSERVATION OF ATLANTIC TUNAS (ICCAT)
PRESENT

Further to your correspondence #3236/18, dated 17 May 2018, regarding 2017 report deficiencies detected by the Compliance Committee in 2017, in particular as regards *Recommendation by ICCAT on Management Measures for the Conservation of Atlantic Sailfish* [Rec. 16-11] and *Recommendation by ICCAT for an ICCAT Scheme for Minimum Standards for Inspection in Port* [Rec. 12-07]. In that respect, I would like to inform you of the following:

- Recommendation 16-11: As stated in your correspondence, Mexico sent the statistical information on sailfish correctly and on time, in compliance with Task I and Task II requirements. Considering the above mentioned information, please find attached the corresponding report which includes the description of national programmes of onboard observers. Furthermore, the final version including the report, was involuntarily not submitted.
- Recommendation 12-07: As regards to this, I would like to highlight that this recommendation was adopted in the 2012 Annual meeting, with entry into force in 2013, year in which the transmittal of information regarding ports was established. However, and in compliance with the ICCAT data and information requirements, Mexico has annually transmitted the information corresponding to the Recommendations in force applicable to our country. For Recommendation 12-07, however, the Compliance Committee did not contemplate this information for previous years, therefore, this information was not included for 2017.

However, aimed at complying with the ICCAT Recommendations, attached please find the form CP24-Authports_TRI duly completed by our country. This form will be transmitted annually.

Thanking you in advance,

Yours sincerely,
The Director General

VERÓNICA ESQUIVEL MEDINA

C.c.e.p. MARIO GILBERTO AGUILAR SANCHEZ.- NATIONAL COMMISSIONER FOR AQUACULTURE AND FISHERIES
mario.aguilar@conapesca.gob.mx

RVEM/ICRR/CKDH*

Managua, 1 October 2018
PE/EJA/418/10/2018

Mr. Derek Campbell
ICCAT Compliance Committee Chair

I am writing in connection with your communication of 17 May 2018 which is titled "Letter regarding reporting deficiencies in 2017".

The communication referred to above states that at the 2017 Compliance Committee meeting a reporting deficiency was observed i.e. late submission of the annual report during the annual meeting. The importance was highlighted of the data not submitted and our country was requested to make the efforts necessary to collect these data and provide them to the Commission.

We were referred to a site to access the list of reporting requirements for the SCRS and the reporting requirements for the Compliance Committee, however, when we clicked on the two places to search for these lists of requirements, we did not obtain any result.

In light of the above and with the aim of complying in a timely manner and in due form, we requested that both documents be sent to us so as to report the information required from us to the Compliance Committee.

I recall that the communication referred to above states that the information must be reported by 10 October of the current year, and therefore I request that these documents be provided to us as quickly as possible so as to comply by the established deadline.

Thank you for your attention, and I extend my cordial greeting to you.

Yours sincerely,

Edward Jackson

(signed and stamped)

Executive Chair

Nicaraguan Institute of Fisheries and Aquiculture

RESPONSE TO THE CHAIR'S LETTER

Compliance Committee Chair
Derek Campbell

cc: Commission Chairman
Raul Delgado

cc: Executive Secretary
Camille Jean Pierre Manel

Dear Sirs,

In response to the letter regarding compliance issues in 2017 № 3236/2018 dated 17/05/2018, we inform that Russia, as one of the founding members of ICCAT, when engaging in any type of fishery in areas where tunas and tuna-like species are observed in catches, applies the current ICCAT measures concerning restrictions and a ban on fishery of quoted species.

At present Russia doesn't conduct a specialized fishery for tunas and tuna-like species. Tunas from the group «Small tunas» are occasionally occurred as a by-catch during trawl fishing in the Eastern-Central Atlantic area. Horse mackerels, sardine, sardinella and mackerel are target species of trawl fishing. Observers working on trawlers annually collect information on by-catch fish. The processed data in the form of Task I and Task II are submitted to the ICCAT Secretariat within a specified time.

Russia fully supports the ICCAT actions aimed at implementing resolutions, recommendations and reporting requirements as well as complying with ICCAT decisions. Referring to the above ICCAT letter, we inform as follows:

1. In the summary tables of Russian Annual Report 2017-2018, in accordance with the requirements of ICCAT, explanations are given in the case of the «Not Applicable» answer. For example: if there is no fishery, then «Not applicable. There is no fishery» is specified.

2. Information on sea turtles. An observer who collected scientific data aboard one of the trawlers in 2016 and 2017, didn't record the turtle occurrence in the surveyed catches. Thus, there were no turtles in the by-catch. Probably, midwater trawling was performed on sites and in areas where the sea turtles abundance was low and (or) there were no turtle interactions with this fishing gear.

The recommendations on the need to release turtles if they were caught (entangled) and returned to the sea, had already been sent to the shipowners of the trawlers in advance.

3. Measures required by Rec. 16-13 regarding sharks, were carried out. However, as the «*Recommendation by ICCAT on improvement of compliance review of conservation and management measures regarding sharks caught in association with ICCAT fisheries*» [Rec.16-13] indicates sharks caught in the ICCAT specialized fishery, our data on sharks were not included in the Report 2016-2017. In 2017 observers continued to collect data on sharks (see table). Information on sharks based on results of works of 2017 was processed both in the form of tables Task I and Task II and was sent to ICCAT (27/07/2018). In addition, the check sheet on the implementation of the ICCAT Shark Recommendations was completed.

Observer data on the shark by-catch collected by Russian trawlers and some parameters of sharks in 2016

Species (English name)	Species (Latine name)	Month	Measure ment analysis (ex.)	Coordinates	Length of fish TL from to cm	Total length TL	Sex <u>M</u> F
Blue shark	<i>Prionace glauca</i>	8, 9, 10, 11	<u>14</u> 14	21°41'- 22°32' N'	79-120	97,5	<u>8</u> 6
Shortfin mako	<i>Isurus oxyrinchus</i>	11	<u>2</u> 2	21°35'- 21°43' N'	115	115,0	<u>1</u> 1
Smooth hammerhead	<i>Sphyrna zygaena</i>	1, 9, 11	<u>4</u> 4	21°31'- 21°45' N'	78-127	112,3	<u>4</u> 0

Observer data on the shark by-catch collected by Russian trawlers and some parameters of sharks in 2017

Species (English name)	Species (Latine name)	Month	Measure ment analysis	Coordinates	Length of fish TL from to cm	Total length TL	Sex <u>M</u> F
Blue shark	<i>Prionace glauca</i>	8, 9, 10, 11	<u>16</u> 16	21°31'- 21°52' N'	79-135	96,9	<u>10</u> 6
Shortfin mako	<i>Isurus oxyrinchus</i>	6, 8, 10, 11	<u>7</u> 7	21°21'- 21°48' N'	91-142	115,9	<u>4</u> 3
Scalloped hammerhead	<i>Sphyrna lewini</i>	5, 8, 9	<u>3</u> 3	21°25'- 21°49' N'	97-139	113,7	<u>1</u> 2
Smooth hammerhead	<i>Sphyrna zygaena</i>	6, 8, 10	<u>4</u> 4	21°25'- 21°49' N'	67-210	122,3	<u>3</u> 1

4. The list of Russian ports available for the entry of foreign fishing vessels was not included in the Report 2016-2017, since all ports are in inland seas and far from fishing areas.

The Report 2017-2018 includes data on the list of Russian ports in which foreign vessels may enter in accordance with the decision of the state authorities.

The ports of Russia are open for the entry of foreign fishing vessels: the Baltic Sea - Kaliningrad, St. Petersburg, Vyborg; the Black Sea - Sochi, Tuapse, Feodosia, Sevastopol, Novorossiysk, Kerch, Anapa, Yalta (Order of the Government of the Russian Federation of September 29, 2014 No. 1912-p). We are sending the attached Table CP24-AuthPort (Entry of foreign vessels into CPC ports) to the ICCAT Secretariat.

Sincerely yours,

A.G. Vasilyev
Assistant Director

Subject: Letter regarding deficient reporting to ICCAT in 2017

REF: V/L ICCAT-SALIDA N°3236/2018/ of 17/05/2018

Dear Chair,

I acknowledge receipt of your letter referenced in the subject informing me of the reporting deficiencies noted at the 2017 Compliance Committee meeting for Senegal in relation to the scientific observer programme and the sailfish data collection programme.

In response, I would like to transmit the following information on these two points.

Senegal has implemented a scientific observer programme since 1982. With the developments in the tuna industry, all these observers were made available for research, which has strengthened their capacities and led to the introduction of a new data collection protocol in accordance with ICCAT recommendations. Therefore, this national onboard observer programme is of a scientific nature.

With regard to coverage rate, overall coverage for the entire Senegalese tuna fleet in 2017 was 31.8%. The coverage rate even reached 100% for national purse seiners (operating in Senegal's EEZ), which started carrying onboard observers in 2017.

In any case, the State is in the process of developing strategies to place observers onboard other types of tuna vessels (baitboats and longliners), despite the constraints set out in the 2016 national report.

Regarding the absence of the report on implementation of Rec. 16-11 relative to the sailfish data collection programme, I can inform you that data collection on billfish (sailfish and marlins) caught by the artisanal fishery has been strengthened and improved since implementation of the Enhanced Programme for Billfish Research (EPBR). This programme has enabled Senegal to provide Task I and II data to ICCAT.

In addition, my country has started to incorporate Recommendations 16-11 and 16-14 into the regulatory framework to facilitate their implementation.

Yours sincerely,

Mamadou GOUDIABY



**MINISTRY OF FISHERIES AND MARINE RESOURCES
OFFICE OF THE DIRECTOR OF FISHERIES**

TEL: (00-232-22) – +232 76 619 276
Email: kadijatujaalloh4@gmail.com

Youyi Building, 7th Floor, Brookfields,
Freetown, Sierra Leone

16th August, 2018

Mr. Derek Campbell,
The Compliance Committee Chairman,
ICCAT.

Dear Sir,

LETTER OF IDENTIFICATION.

I write with reference to your letter of 17th May, 2018, informing us of the ICCAT Compliance Committee identifying Sierra Leone for failing to submit annual Catch report to ICCAT since 2012.

Mr. Chairman, please be informed that we sent our Task Data1 (Nominal Catch) for our Tuna species from 2011 to 2013. We were to have submitted the data for 2016, when we received a message from Mr. Carlos Palma, the Biostatistician at the ICCAT Secretariat, informing us that all the forms we sent for 2014 and 2015 was an old format. We are also informed that the data was discarded because it has already been reported by another CPC; therefore to avoid the duplication, the data was discarded.

Whilst we were preparing to submit the data for 2016, in the new format, we have also been notified that, Sierra Leone should only report Tuna Catches from our national fleet, including boats from the small scale fishermen and from vessels with chartering arrangements flying a Sierra Leone flag. Unfortunately, all the Licensed Tuna vessels in Sierra Leone are Spanish and French, we also don't have any Tuna vessels Licensed in Sierra Leone and flying a Sierra Leone flag. Getting Tuna data from the artisanal sector will require some capacity building and other support for us to be able to have the basic reporting skills.

In view of the above, I want to use this opportunity, to kindly request the ICCAT Secretariat to provide us with some support and capacity building on Tuna data collection and reporting issues, for both the Industrial and from the artisanal sector for an improved and better data reporting systems. We will also require further support for the Regional Tuna Observers programme, for us to have our observers onboard the Tuna vessels.

Thanking you for your usual support and cooperation.

Yours faithfully,

Kadijatu Jalloh (Mrs.),
Ag. Director of Fisheries and Marine Resources.

Copy:

- The Hon. Minister, MFMR.
- The Hon. Dep. Minister, MFMR.
- The Permanent Secretary, MFMR.
- The Ag. Deputy Director of Fisheries, MFMR.
- The O/C Statistics Unit, MFMR.



**GOVERNMENT OF ST. VINCENT AND THE GRENADINES
MINISTRY OF AGRICULTURE, FORESTRY, FISHERIES,
RURAL TRANSFORMATION, INDUSTRY AND LABOUR**

RICHMOND HILL
KINGSTOWN
VC0120

St. Vincent and the Grenadines

Ref: AFFRTIL/

Date: 10th October, 2018

Mr. Derek Campbell
Compliance Committee Chair
ICCAT Secretariat
SPAIN

Dear Mr. Campbell,

St. Vincent and the Grenadines acknowledges the concerns about reporting deficiencies raised by the Commission at the 2017 Compliance Committee meeting and assures the Committee that efforts have been made and are continuing to be made to address the issues stated in the letter dated 17th May, 2018.

Please note the following responses to the points raised by the Compliance Committee:

- St. Vincent and the Grenadines has made a concerted effort to submit the ICCAT annual report on time in 2018. The report was submitted on 1st October 2018;
- St. Vincent and the Grenadines has established its domestic observer programme and has submitted a domestic observer report along with the ICCAT annual report on 1st October 2018;
- St. Vincent and the Grenadines submitted a shark management plan on 1st October 2018 as an appendix to the ICCAT annual report. This shark management plan lays the foundations for addressing ICCAT's shark management requirements;
- Interactions of St. Vincent and the Grenadines' fleet with turtles and seabirds were noted in the Observer report which was submitted on 1st October 2018;
- St. Vincent and the Grenadines acknowledges that implementation of ICCAT requirements are not just for the High Seas vessels but for all waters of the ICCAT Convention Area, including waters under national jurisdiction and all fisheries that

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interact with ICCAT species. **The Fisheries Act (1986) and Regulation (1987)**, which form part of the OECS harmonized legislation, covers, Fisheries access agreements, local and foreign fishing licensing, fish processing establishments, fisheries research, fisheries enforcement and the registration of fishing vessels. The legislation also specifies conservation measures such as prohibiting the use of any explosive, poison and other noxious substance for the purpose of killing, stunning, disabling, or catching fish; closed seasons, gear restriction, creation of marine reserves. The legislation gives the Minister responsible for fisheries, the authority to create new regulations for the management of fisheries when necessary. The **Fish Processing Regulations of 2006** drafted in response to increasingly stringent domestic and international market requirements for the monitoring and controlling the quality of fish and fish products leaving and entering SVG. The legislation makes provisions for the control of marketing, handling, transporting and storage of fish and the operation of fish processing establishments. **The High Seas Fishing Act of 2001**, which provides the legal basis for the regulations of St. Vincent and the Grenadines registered vessels fishing on the High Seas. The act provides for constant monitoring of these fishing vessels in an effort to produce accurate information, which under provisions of the act is mandatory in order to be compliant to the International Convention for the Conservation of Atlantic Tunas (ICCAT)

- As part of the FAO project: **Strengthening Fisheries Legislation in St. Vincent and the Grenadines – focus: IUU fishing**, there was a revision of the Fisheries Act (1986), the High Seas Fishing Act (2001) and the IUU Fishing Regulations (2017). FAO has provided the Government of St. Vincent and the Grenadines with the report: “A Review of Fisheries and related legislation in St. Vincent and the Grenadines” which has identified gaps and constraints in the national and policy framework, and steps are being made to address these issues. The National Ocean Policy and Action plan was reviewed and adopted by Cabinet.
- Having acceded to the “Agreement on Port State Measures to prevent, deter and eliminate Illegal, Unreported and Unregulated fishing” in 2016, the government of St. Vincent and the Grenadines has taken further strides in its fight to combat Illegal, Unreported and Unregulated fishing. On 22nd May, 2017, Cabinet gazetted the **Fisheries (Prevention of**

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Illegal, Unreported and Unregulated fishing) regulations 2017 which brings in line the efforts of the state to close its ports to vessels involved in Illegal, Unreported and Unregulated (IUU) fishing. This new regulation means that foreign fishing vessels wishing to land fish in St. Vincent and the Grenadines will be required to request permission from specifically designated ports ahead of time, as well as transmitting information on their activities and the fish they have ahead of time. It also allows the Authorities to conduct regular inspections including the review of the vessels' papers, surveys of fishing gear, examining catches and checking a ship's record which can often reveal if it is engaged in IUU fishing. These efforts continue to highlight that the Government of St. Vincent and the Grenadines recognizes that IUU fishing is among the greatest threats to a sustainable fishing industry and as such, improvements will continue to be made to legislation, policies and other key issues that need to be addressed, such as the landing of the High Seas Catch at St. Vincent and the Grenadines' ports.

- A Memorandum of Understanding (MOU) was established between the Fisheries Division (Fish Div.) and the Department of Maritime Administration, on the 20th June 2017. It was established pursuant to Section 393 of the Shipping Act and Regulations (CAP 363 of the Revised Edition of the Laws of Saint Vincent and the Grenadines, 2009), as amended, [of the ONE PART] and the Fisheries Division, which administers on behalf of the Minister responsible for fisheries, the Fisheries Act and Regulations (CAP 59 of the Revised Edition of the Laws of Saint Vincent and the Grenadines, 2009), as amended, and the High Seas Fishing Act, and Regulations, (CAP 61 of the Revised Edition of the Laws of Saint Vincent and the Grenadines, 2009), as amended, of the OTHER PART, to regulate the activities of fishing vessels. The MOU, serves to establish the guidelines upon which the SVGMARAD and FISHDIV cooperate to effectively regulate the activities of local fishing vessels which are registered pursuant to the provisions of the Shipping Act, foreign fishing vessels which are licensed to fish in the fishery waters of SVG and locally based foreign fishing vessels. A High Seas Fishing Vessel License and Registration form has also been produced as a supplementary document to the MOU. This form will be used by the Fisheries Division and Maritime Administration to facilitate the review and approval of High Seas fishing vessel applications. The Fisheries Division and Maritime Administration has also established a

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joint committee with the intention of reviewing the MOU and its implementation, and making amendments as the need arises.

St. Vincent and the Grenadines recognizes the importance of the data and information requested by the Commission and it is acknowledged that late or incomplete reporting raises difficulties for the Commission, its Panels and Committees.

St. Vincent and the Grenadines, in no way wishes to reduce the effectiveness of the Compliance Committee and asks for the Commission's indulgence as the matters are rectified and reporting issues are resolved.


Raymond A. Williams
Permanent Secretary
Ministry of Agriculture, Forestry, Fisheries,
Rural Transformation, Industry and Labour

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Dear Sir,

Referring to your letter No. 3236/2018 dated 17/5/2018 regarding deficiencies in Syria's fulfilment of certain ICCAT reporting and data requirements. We would like to clarify the following:

1. The annual report was submitted late due to technical default, this matter will be solved and we confirm that the annual report will be sent in proper time adopted by ICCAT in coming years.
2. The fleet characteristic data (ST01- T1FC) was sent to ICCAT in August 2017 (mail subject COC REPORTING TABLES) for calendar year 2017, only one vessel conducted BFT fishing activity in 2017 to catch Syrian allocated quota, and the catch was 56906 kg (ST01- T1FC for 2016 and 2017 attached).
3. Fishing in Syria is traditional in territorial water generally using gill nets, sharks are not actively targeted by the national fishermen. Fishing of shark not popular in Syria with no catch recorded of species covered by ICCAT recommendations in previous years. Vessels flying Syrian flag are not likely to catch any sharks species covered by ICCAT recommendations, therefore no shark measures implementation check sheet was submitted.
4. The fishing gear used to catch BFT is purse seine and the authorized period for fishing is from May 26 to June 24 every year, and catching of BFT during previous years occurred in June, with no catch of BFT was recorded in the rest of the months (0 catch), we confirm that monthly catch reports will be sent regularly including reports of monthly 0 catch, monthly catch reports had been sent regularly to ICCAT in 2018 [monthly catch report for 2017 attached].

Due to the circumstances in Syria during previous years there were some deficiencies in fulfilment of certain ICCAT reporting and data requirements, and as the situations improved, Syria will make the necessary efforts to fulfil all ICCAT reporting obligations and data requirements.

Please accept the assurances of my highest consideration.

Dr. Abdel latif ALI
Director General of
General Commission for Fisheries Resources

**MINISTRY OF AGRICULTURE, LAND & FISHERIES
Fisheries Division**

5 October, 2018

Mr Derek Campbell
Compliance Committee Chair
International Commission for the Conservation of Atlantic Tunas (ICCAT)
Corazón de María
8 – 28002 Madrid
SPAIN

Dear Mr Campbell

SUBJECT: LETTER REGARDING COMPLIANCE ISSUES IN 2017

The Delegation of Trinidad and Tobago conveys its compliments to the Commission and its Secretariat and reaffirms its commitment to management of the Atlantic tuna and tuna-like fisheries for the benefit of existing and future generations.

Reference is made to your letter dated 17 May 2018 which seeks a response from Trinidad and Tobago on the compliance deficiencies noted by the Compliance Committee for the country. The Delegation is pleased to note that the Commission has lifted the country's identification. We wish to reiterate our commitment towards contributing to global fisheries conservation and management efforts and in particular, conservation and management of those resources within the Convention Area under ICCAT's management purview.

No explanations in the fields where Trinidad and Tobago responded "Not applicable" or "N/A" in the 2017 Annual Report

This deficiency has been addressed in the 2018 Annual Report.

No report on bycatch/discards or turtle mitigation as required under Rec 11-10 (requirement by BYC S42) or Rec. 10-09 (requirement by BYC S38)

Due to severe and continuing financial and human resource limitations Trinidad and Tobago has not been able to implement an Observer Programme or any other specific programmes to mitigate bycatch And reduce discards for tuna and tuna-like species. In the interim, the Fisheries Division is collaborating with vessel owners and operators to report discards from the longline fleet.

No designated list of authorized ports that may be entered by foreign fishing vessels or contact points submitted in accordance with paragraphs 7 and 9 of Rec. 12-07, nor any indication in the Annual Report (GEN 0011) on a specific prohibition on entry of foreign fishing vessels.

The Fisheries Division is working with the relevant Competent Authorities and will submit the list of authorized ports for entry of foreign fishing vessels and requisite contact points in the coming months. Under a 5-year Port State Measures Support Project, GCP/RLA/222/USA, which is funded by the United States and implemented by the FAO and the National Oceanic and Atmospheric Administration (NOAA), USA, Trinidad and Tobago would be seeking to strengthen implementation of its port State obligations.

Incomplete (2nd semester 2016) or late submission (1st semester 2017) of the bi-annual statistical reports under Rec. 01-21 and Rec. 01-22.

This situation is a result of continuing staff shortages at the Fisheries Division. Currently the Division is awaiting a ruling of senior decision makers on a proposal to establish a Fisheries Inspectorate. This Inspectorate is expected to improve capacity for fisheries monitoring, control, surveillance and

enforcement. In spite of the staffing challenges Trinidad and Tobago is placing emphasis on improving its reporting. It is to be noted that in 2017, of the 23 reports for which information or data were available for Trinidad and Tobago, 16 reports (70%) were submitted on time, 6 reports (26%) were submitted late and 1 report was not submitted. In comparison, in 2018, of the 23 reports for which data and information were available, 19 reports (83%) were submitted on time, 2 reports (8.5%) were submitted late and 2 reports (8.5%) are outstanding - bi-annual statistical reports under Rec. 01-21 and Rec. 01-22 (TRO 2006 and SWO 3001). We commit to submitting these reports at the soonest.

Trinidad and Tobago wishes to reassure the Compliance Committee of its commitment to improving its conservation and management regime. The Draft Fisheries Management Bill (2018) – an output of the FAO funded project TCP/TRI/3601/C1 - TCPF “Strengthening Fisheries Legislation in Trinidad and Tobago – Focus: IUU Fishing” (July 2017 to December 2018) - is currently before Cabinet. Passage of the Draft Fisheries Management Act was determined to be the most significant intervention required for Trinidad and Tobago’s advancement with respect to compliance with its international obligations.

Trinidad and Tobago looks forward to participating in the 2018 Commission Meeting and extends assurances of its highest consideration.

Yours sincerely

Director of Fisheries/
Trinidad and Tobago Head Delegate

Dear sirs,

I have the honour to transmit to you our responses and comments for each of the points raised in the letter from the Compliance Committee Chair of 17 May 2018 on underreporting in 2017:

- With regard to transshipment and as additional information to our letter included in document COC-307/2017 from the 2017 ICCAT annual meeting where it is stated that "Tunisian purse seine vessels fishing for small tunas can work in a group. This fishing method (joint fishing) is used in particular in areas that are far from landing ports, for reasons of cost-effectiveness. The part quantities of each vessel are transhipped to a single vessel which carries out the transport operation to the landing port", none of these purse seine vessels has carried out a transshipping operation within the meaning of Recommendation 14-04. This is because the practice actually consists of hauling the fish caught in the net of a vessel engaged in fishing and placing it onboard another vessel in a location that is used only to collect the products fished by all the vessels belonging to the same group.

Therefore, it is not a transshipment operation from one vessel to another but simply an operation to haul fish that have been caught in a net at sea and place it onboard a collection vessel. In addition, the facts outlined in the inspection report of the European Union refer to a hauling operation and not to transshipment which is prohibited by the Tunisian regulation (Law No°94-13 of 31 January 1994, on fishing, article 15).

- In relation to the concerns expressed in the COC discussions regarding the level of by-catch of bluefin tuna taken by the Tunisian small tunas purse seine fishery, it should be noted that the purse seine vessels with a license to fish for small tunas are authorised to fish 12 months a year and can land bluefin tuna catches as by-catch in accordance with paragraph 29 of Recommendation 14-04.

Likewise, in accordance with the Tunisian regulation, the mesh size of the purse seines used must be no less than 50 mm (Order of the Minister of Agriculture of 28 September regulating fishing - article 17). However, to avoid and/or minimise bluefin tuna by-catch during its entry period of entry into the Mediterranean for spawning, management and monitoring measures have been implemented by the Administration through:

- Dissemination of a circular to the regional fisheries services which prohibits the use by these purse seine vessels of purse seines with a mesh size larger than 50 mm from 1 May to 31 July each year.
- Greater control: inspection campaigns carried out jointly with the national navy to ensure compliance with the circular referred to above.
- Participation of 8 new purse seine vessels in the bluefin tuna fishing campaign by mutual agreement with the profession and in compliance with the capacity management measures as stipulated in Recommendation 14-04 (and 17-07).

- As to bluefin tuna catches reported by the small tunas fishery, this year Tunisia has reported these catches in accordance with Recommendation 14-04 para 67.

- Regarding the measures taken in October 2017 against the purse seine vessel, given the inconsistency in the amounts reported by the vessel master ⁽¹⁾ and the inspector ⁽²⁾, the amount observed was counted against by-catch and measures were taken against the vessel's master which consisted of provisional withdrawal of the fishing license and imposition of a heavy fine.

- (1) The enquiry carried out by our administration has shown that on 20/10/2017 the vessel entered the port of Zarzis due to bad weather and the catch was recorded by the fishing guard: bonito (100 kg), little tunny (3 t). This catch is recorded in the fishing logbook. According to the fishing master, bluefin tuna individuals (70 specimens) with a unit weight from 30 to 35 kg were discarded at sea before entry to the port in accordance with the regulation in force.
- (2) The inspection report refers to the onboard presence at the time of inspection of an estimated quantity of 14.7 t of bluefin tuna.

Finally, it should be noted that while some unusual anomalies have been highlighted, Tunisia has experienced an exceptional period in terms of security, which has been characterized in particular by an unprecedented migratory flow that has affected the country, creating hotspots of great tension in the region.

In order to address this situation, our country has been compelled to mobilize all available means, including in particular the maritime control vessels, to stem the flow and mitigate the risk of human disasters which are highly likely in the region.

If this objective has somehow been achieved, it has unfortunately been at the expense of an activity that has been reluctantly pushed into the background i.e. the fight against illegal, unreported and unregulated fishing.

This consideration has quickly prompted the competent authorities in Tunisia to take the decision to strengthen for the time being the coastal surveillance fleet through acquisition of new maritime control vessels (underway), and the hire of fishing guards to support the current workforce (66 fishing guards hired since February 2018).

In addition, as noted above, during the 2018 campaign, at sea and in port inspection missions were carried out jointly by permanent agents of the fishing guard, the national guard and coastal surveillance (national navy).

All of this, of course, indicates Tunisia's firm commitment to use all means to address any potential underreporting and to fulfill its conservation and control commitments in the most satisfactory way.

Finally, please be informed that we are fully available to actively cooperate in carrying out any activities of common interest in accordance with the relevant provisions regulating the fishing activities managed by ICCAT.

Derek Campbell
 Compliance Committee Chair
 Corazon de Maria, 8
 28002 MADRID
 Spain

9 October 2018

By email: info@iccat.int

Dear Mr Campbell

REPORTED DEFICIENCIES FROM 2017

Thank you for your correspondence of 17 May 2018, on behalf of the International Commission for the Conservation of Atlantic Tunas (ICCAT), highlighting the United Kingdom Overseas Territories (UKOTs) compliance deficiencies from 2017, which were reported during the 25th Regular meeting of ICCAT in November 2017.

The Compliance Committee noted a number of deficiencies for the UKOTs which I have addressed in turn:

- The Part II of the Annual Report was submitted late
The UKOTs accept that Part II of the Annual Report was submitted 8 days after the deadline
- The BCD annual report was also submitted late
The UKOTS accept that the BCD annual report was submitted over 2 weeks after the deadline.
- No plan for improving data collection for sharks on a species specific level was presented
There is an extremely limited shark catch within UKOTs waters, with only 255kg of shark species caught during 2017. As they are not a target species every effort is made to release sharks species alive when caught as by-catch. Given the UKOTs do not have a directed shark fishery implementation of improved data collection had not been actioned. During 2018 the UKOTs have submitted the Shark Implementation Check Sheet for the limited shark species retained.
- No list of designated ports that may be entered by foreign fishing vessels or contact points were submitted, in accordance with paragraphs 9 and 7 of Rec. 12-07, nor is there any indication in UKOT's Annual Report (GEN 0011) of a specific prohibition on entry of foreign fishing vessels.
The UKOTs have limited port facilities used by small artisanal fleets which are inappropriate for larger, long distant fishing vessels. Therefore there are no designated ports which may be entered by foreign fishing vessels within the UKOTs. In force majeure cases, foreign fishing vessels could seek entry into port through the domestic procedures in place but would not land any proportion of catches due to the lack of market facilities.

The UKOTs apologise for the delays in submitting information on or before the prescribed deadline and the oversight in not reporting our position in relation to improved data collection for shark species and designated ports.

We strongly support the work of the Compliance Committee and believe that the work is essential to conserving the fish stocks within ICCAT's remit. Special measures that were put in place during 2017 are now achieving results and we are pleased to report that all information during 2018 has been submitted on time.

Kind regards,

Kylie

Kylie Bamford
 Head of Marine Conservation

October 10, 2018

Derek Campbell
Compliance Committee Chair
International Commission for the Conservation of Atlantic Tunas
Madrid

Dear Mr. Derek Campbell,

Letter Regarding Reporting Deficiencies in 2017

Please allow me to introduce myself.

My name is Delma Nedd and I have recently assumed the chair as Permanent Secretary of the Ministry of Agriculture on the 1st February, 2018.

The Fisheries Department of the Ministry is tasked with the responsibility of submitting all data and documentation requested by the International Commission for the Conservation of Atlantic Tunas (ICCAT). However, there have been some challenges which impeded the delivery of timely reports.

Nonetheless, with reference to your letter dated 17th May, 2018 and the four (4) issues in particular, please note the following:

Issue 1: No statistical data were submitted and, in particular, no Task 1 fleet characteristics data (form ST01) were submitted.

Response 1: This was submitted on October 9th 2018

Issue 2: The summary tables of the annual report (part 1 and part 2) were not submitted.

Response 2: This was submitted on August 8th 2018

Issue 3: The Compliance tables were submitted two months after the deadline of Rec.16-16.

Response 3: We will ensure that this is not repeated and all required data will be submitted on time

Issue 4: No shark measures implementation check sheet, as required by Rec. 16-13, was transmitted.

Response 4: This check sheet is being submitted together with this letter. We must inform you that the shark fishery is a small industry and for the past five years just over 491,000 kgs were exported. We are currently working to have a plan of action for sharks so we can report more effectively on this check sheet.

In addition, the Ministry would have since identified a focal point, Ms Ingrid Peters, Principal Fisheries Officer, email address guyanafisheries@gmail.com.

Please note that my email address is ps.moagy@gmail.com and that of the Chief Fisheries Officer remains the same.

In conclusion, be assured that my country aims to become a full member of ICCAT and therefore assures the Compliance Committee that going forward all efforts would be made with regard to the submission of timely reporting.

Regards,

Yours sincerely,

Delma Nedd
Permanent Secretary
Ministry of Agriculture